

Pre-Budget Submission 2016-2017

NDS WA State Budget Priorities 2016-2017





National Disability Services
Western Australia

National Disability Services WA 2016-17 Pre-Budget Submission

Prepared for the Government of Western Australia

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About NDS WA

National Disability Services (NDS) WA is the peak industry association representing community disability service providers working to improve life opportunities for people with disability State-wide.

NDS WA represents the vast majority of the disability services sector, with over 100 organisational members drawn from not for profit disability services in metropolitan, rural and remote regions. It is part of a national association representing nearly 1,000 organisations.

Collectively, NDS WA members provide services to thousands of Western Australians with a disability and their families and carers. Our members are located across the State and range from small support groups to large multi-service organisations.

The purpose of NDS WA is twofold:

- To increase the capacity of disability service providers to operate efficient and effective services through the provision of information and advice, networking opportunities and access to corporate support; and
- To influence and support the Government of Western Australia to provide a policy environment that is responsive to the needs of people with disability and their service providers.

Our role includes policy development and advocacy on behalf of people with disability, support of disability services and the provision of three access and inclusion programs; ACROD Parking, Companion Card and the Community Living and Participation Grants.

The NDS WA State Committee

The NDS WA State Committee represents Western Australian members and is responsible for setting the strategic priorities of the State branch.

As a body with delegated responsibility, the State Committee channels information and advice to the National Board on State based issues through the State Manager and Chairperson. The Board focuses on governance and national strategic issues. The Committee Chairperson is elected by the Committee and is a member of the National NDS Board. Details of the current membership of the NDS WA State Committee are shown at Appendix 1.

The NDS WA State Committee seeks to:

- Strengthen NDS in Western Australia;
- Provide quality member services;
- Influence Government policy;
- Forge strategic relationships; and
- Develop strategic priorities that respond effectively to the concerns and interests of members in Western Australia.

NDS members
provide services to
thousands of people
with disability and
their families and
carers.

Almost
400,000
Western
Australians have
a disability.

The 2015-16
disability budget
will be almost
\$1 billion.

Foreword

On behalf of National Disability Services (NDS) WA I am pleased to present our Pre Budget Submission (PBS) 2016-17.

The NDS WA PBS 2016-17 highlights the key policy issues facing the disability services sector in an environment of transitional change and monumental reform at national and State levels which will largely be shaped by the implementation of the National Disability Insurance Scheme (NDIS).

The Government of Western Australia has provided strong support for initiatives advocated by NDS WA in our previous submissions. The quality and credibility of these have been acknowledged by Government and many of the priority areas identified are also of great importance to Government, the Disability Services Commission (DSC) and most importantly, people with disability in Western Australia.



Tony Vis
Chairperson

NDS WA acknowledges that the State Government has clearly demonstrated an ongoing commitment to delivering better outcomes for people with disability in Western Australia through investment in initiatives that are improving the lives of these people and their families. Significantly, total spending on disability services in Western Australia has increased by 122 per cent since 2008-09.¹

NDS WA welcomed the additional growth funding for disability services in Western Australia announced in the 2015 State Budget. The DSC Budget for 2015–2016 will be almost \$1 billion at \$964 million including contributions from the Commonwealth Government and other income sources with the West Australian Government providing most of these funds at \$717 million.² This significant level of funding goes a long way to supporting people with disability, their families and carers.

NDS WA acknowledges the State Government's past strong investment in the disability sector and the current budget challenges and constraints across the forward estimate years. NDS WA is delighted at this level of investment given there are many competing community funding requests which the Government needs to consider.

The disability sector faces a period of substantial change and is at a critical juncture with the transition to the NDIS from the State based system. This transition must be successfully navigated if the potential of the NDIS is to be fully realised. On a national and State front it is critical that the long-term social and economic gains of the NDIS are fortified. This requires secure funding for full implementation, resolution of outstanding policy issues through a co-design process, investment in transition support and investment in a sustainable disability workforce.

Our PBS articulates a strategic future direction for the disability sector in Western Australia. Its aim is to give Government a clear picture of the challenges facing the sector and people with disability in our State and help determine funding priorities to address the most critical areas of demand for services that are currently unmet.

Our PBS highlights the importance of the Western Australian disability services sector working in close partnership with the Government of Western Australia to improve the life of people with disability in our State.

An important theme of this year's submission is to build on the existing strong level of services that are provided in Western Australia – which leads the nation in many aspects of the design and delivery of disability services. NDS WA urges the Government of Western Australia to commit to a rollout and full transition to a NDIS across Western Australia based around the principles of a local decision making model. Its focus must ensure that people with disability and the disability services sector have a strong influence in shaping the implementation of a NDIS that is locally responsive to the needs of people with disability in Western Australia. NDS WA supports the implementation of a NDIS that is locally governed and operated by the State Government.

By achieving these objectives, Western Australia will be well-positioned to ensure a successful and full transition to the NDIS; people with disability, their families and carers will be able to access high quality specialist and mainstream services; and disability services sector organisations will continue to play a key role in providing disability services in our State.

NDS WA seeks the Government of Western Australia's commitment to this key priority and the other priorities outlined in this PBS.

Our PBS 2016-17 provides Government with a proposal to develop a Disability Services Industry Plan to assist with the transition to a NDIS across Western Australia and highlights ten disability funding priorities that need to be addressed to deliver better life outcomes for people with disability in our State.

Tony Vis
Chairperson

Executive Summary

The NDS WA Pre-Budget Submission (PBS) 2016-17 outlines the key issues facing the disability sector in Western Australia and identifies budget recommendations to the State Government in the lead up to the Western Australian State Budget 2016-17.

The NDS WA Pre-Budget Submission has a strong focus on securing funding to stimulate communities and mainstream services in accordance with the National Disability Strategy.³ The National Disability Strategy, an initiative of the Council of Australian Governments (COAG) agreed by all levels of Government including the Government of Western Australia, is a national approach to improving outcomes and whole of life opportunities for people with disability in Australia.



Julie Waylen
WA State Manager

The submission focuses on delivering priority recommendations in the six key policy areas articulated in the National Disability Strategy 2010-2020 including:⁴

1. Personal and community support;
2. Rights protection, justice and legislation;
3. Learning and skills;
4. Economic security;
5. Inclusive and accessible communities; and
6. Health and well being.

Our PBS 2016-17 advocates Government commitment to NDIS in WA and investment in a Disability Services Industry Plan that has a core focus on promoting better outcomes for people with disability in Western Australia in the six policy areas of the National Disability Strategy and increased choice and control through a diverse and quality disability sector.

Commendable Investment in the Disability Sector

In a tough budgetary environment, it most pleasing the State Government is continuing to prioritise providing essential support to people with disability. This is demonstrated through initiatives such as the decision to implement a No Fault Insurance Scheme (NFIS), the construction and opening of the first Disability Justice Centre in 2015-16 at a cost of \$8.5 million; and continuing commitment for suitable accommodation for younger people with disability (\$9 million over four years).

These are all important initiatives that address areas of critical need and pave the way for the future development of a comprehensive and contemporary service system for people with disability based on entitlement, choice and control over their lives.

NDS WA particularly commends the State Government decision to invest \$2 million over the next two years to develop a State-wide network of Changing Places which will provide more opportunities for people with disability to participate in community life.

The DSC, working in partnership with the Western Australia Local Government Association, will provide funding for local governments to construct a Changing Places network over the next two years across metropolitan and regional Western Australia in locations identified by the people who will use them and the local governments that will provide them.

This important initiative was a prominent priority in our NDS WA Pre Budget Submissions 2014 and 2015.

The increase in total funding for disability services in 2015-16 of \$98 million or 11.3 per cent (in addition to funding for the NDIS trial sites of \$39.8 million over 2014-15 and 2016-17) will be used to meet the growing community need for disability services in Western Australia and accommodate increasing demand for support and services.⁵

NDS WA is also pleased that the State Budget 2015-16 made provision for growth funding of \$27.6 million (\$24.6 million from the State). This growth in recurrent funding will assist disability services sector organisations to provide supports and services to a greater number of people with disability. It will ensure that additional demand for services can be addressed even as the DSC progresses work towards a full rollout of the NDIS.⁶

The strong State Government commitment to the disability services sector is also demonstrated through funding provided to NDS WA to work to build a sustainable sector in Western Australia including funding for:

- Quality Service Improvement;
- Induction and Employment Trial project;
- Workforce Development – Increase recruitment of support workers;
- Workforce Development Traineeships;
- Community Living and Participation;
- Coordination of Sector Training grants;
- ACROD Parking;
- Companion Card and Core Services;
- Occupational Health And Safety project;
- Sector Training;
- Procurement Reforms – Capacity Building Phase 4; and
- Development of Shared Quality Assurance System for Disability Service Organisations and Mental Health Service Organisations.

Priorities for 2016-17

This year our highest priority recommendation is that the State Government must commit to a roll out of the NDIS across Western Australian implementing a local decision making model based around the core principles of choice, control and subsidiarity for people with disability where decisions are best made locally and as close to the ground as possible.

Consistent with the State Government Delivering Community Services in Partnership Policy (DCSP Policy), the particular focus of NDS WA is to fashion a NDIS that is the best possible support system for Western Australia and to ensure that people with disability and the disability services sector have a strong voice and influence the practical design of the full NDIS implementation in our State.

Experience has shown us that local management has facilitated good and sensible outcomes over many years.

The heart of disability services in Western Australia is in its focus on people and their quality of life. It is integral that the NDIS in our State be designed so that decision making and accountability is from the citizens it impacts; giving them the strongest influence on the conditions that make up their lives.

NDS WA is supportive of the unique NDIS trial arrangements in Western Australia that involve two different models of service trialled in different locations over a two-year period; the Commonwealth National Disability Insurance Agency (NDIA) model in the Perth Hills region and the WA NDIS My Way model in the Lower South West and Cockburn-Kwinana areas.

It is vital that there is a strong commitment to the rollout of the NDIS across Western Australia and that it be informed from the findings of the evaluation of the two NDIS trial sites in Western Australia, supported by credible evidence based data and underpinned by comprehensive engagement with the disability services sector and people with disability.

To support this transition, NDS WA recommends that the State Government should invest in developing a Disability Services Industry Plan and establish a NDIS Sector Innovation Fund to build a strong disability services sector that provides increasing and diverse choice for people with disability in metropolitan, regional and remote locations across Western Australia.

The Government of Western Australia should also continue its State-level reform work to build a robust partnership between Government and the not for profit sector based around cooperation and shared responsibility. Priorities are to ensure there is continuing commitment to the DCSP Policy and paying a fair price for services. In addition, as part of the ongoing review of the DCSP Policy there should be commitment to long-term contracting for disability services and retention of the existing positive funding and service agreement arrangements such as pricing that reflects the fair, real costs of service delivery and advance payments to organisations.

Of equal importance is ensuring the Government of Western Australia implements the best No Fault Insurance Injury Scheme as announced in the 2015-16 State Budget. It is critical that the scheme is designed and developed in consultation with key stakeholders through the establishment of an Advisory Group to guide its implementation on 1 July 2016.

Other high priority areas on which our Pre-Budget Submission 2016-17 focuses include:

- Developing a comprehensive approach to preventing abuse and neglect for people with disability;
- Significant investment to increase education, training and employment opportunities;
- Funding to improve the accessibility of community services for people with disability, including the enforcement and monitoring of ACROD parking, addressing transport accessibility and accessing changing facilities through Companion Card technology;
- Addressing housing ownership and tenure; and
- Investing in a range of health promotion and intervention programs to redress the health inequities of people with disability and raise awareness of this issue in our community.

It is critical that the State Government continues to invest in improving the lives of people with disability in Western Australia across all portfolio areas in addition to its investment in the NDIS to fulfil its obligations to implement the National Disability Strategy. The NDIS only provides funding supports for individuals. The State Government has a responsibility to continue to improve the social and economic inclusion of people with disability in our community by, for example; ensuring community facilities are accessible, providing affordable housing, improving participation in training and employment, and access to justice.

NDS WA consultation with member organisations confirms these policy areas as budget priorities for the Western Australian State Budget 2016-17.

Our Pre-Budget Submission 2016-17 advocates for NDS WA to play a major role as the peak body for non-Government providers in this disability reform process. NDS will be a key source of information, support and advice to guide organisations during the implementation. NDS WA looks forward to working with and supporting members through this period of national disability reform to the benefit of people with disability.

Western Australia is well positioned to ensure a successful transition to the NDIS. People with disability, their families and carers will be able to access high quality specialist and mainstream services and disability services sector organisations and will continue to play a key role in providing disability services in our State. NDS WA seeks the Government of Western Australia's commitment to the budget priorities outlined in this Submission.

Julie Waylen
NDS WA State Manager

State Government Scorecard (2008-2015)

Policy Issues	Comments	Score
National Disability Strategy	The State Government's disability priorities align strongly with national initiatives currently driven through implementing the 10-year National Disability Strategy. However, the Government needs to better monitor the implementation of the Strategy by developing and using performance indicators to track progress and the achievement of designated policy outcomes. In addition, further investment to promote the National Disability Strategy across Government departments and agencies and the private sector need to be considered. This includes developing leadership models where designated 'champions' promote the Strategy in key Government departments.	
NDIS	It is critical that the State Government reaches agreement with the Australian Government to commit to roll-out a NDIS model across Western Australia. NDS WA has been supportive of both the Australian and State Governments' commitment of significant additional funding of over \$100 million for their respective NDIS trials sites in Western Australia (the State Government contribution being \$58 million). Experience has shown that local management and decision making has facilitated good and sensible outcomes over many years. NDS WA urges the Australian and State Governments to deliver an NDIS model that is predicated on local decision making and ensures people with disability exercise true choice and control.	
NFIS	The State Budget 2015-16 decision to implement no fault motor vehicle accident insurance scheme is to be commended. It is now important that the State Government and the Insurance Commission of Western Australia establishes an advisory group and works with key stakeholders to implement the best possible no fault insurance scheme commencing 1 July 2016.	
Protection and Justice	NDS WA recognises there are a number of existing structures and initiatives in Western Australia which contribute to the safety and quality of disability services. The Government's initiative to fund the establishment of Disability Justice Centres for the community's most vulnerable people with disability, the first which opened in August 2015 is most welcomed. However, additional investment is required to protect people with disability from abuse and assist them to access justice. These include developing a more comprehensive approach to preventing abuse and neglect, developing consistent pre-employment screening practices across the disability services sector, investing and building sector capacity to manage and respond to complaints and serious incidents, developing mandatory reporting processes, developing sector workforce induction training, developing evidence based research, and supporting people with disability as vulnerable witnesses in giving evidence.	

Policy Issues	Comments	Score
Education	There needs to be significant work undertaken to assess the implementation of the Disability Standards in Education (2005) including monitoring reporting on the Standards.	
Training	Western Australia's vocational education and training (VET) participation rate for people with disability remains the lowest in Australia. There needs to be significant investment in developing training and employment pathways for people with disability. The State Budget 2015-16 did not contain any provision for training of people with disability or address their low level of participation.	
Employment	While acknowledging the positive initiatives that have been implemented by the State Government on a number of disability employment fronts such as the Disability Employment Strategy and payroll tax and Australian Disability Enterprises' procurement exemptions, much still needs to be done to ensure people with disability have adequate access to training and employment pathways to enable them improved participation in our community. The State Government needs to ensure that the public sector provides leadership in this area.	
Housing	<p>There needs to be additional investment in strategies that increase the supply of suitable housing and accommodation for people with disability including funding to address the key recommendations of the NDS WA July 2014 Housing Ownership and Affordability for People Living With Disability Report with a priority being incentives for advancing Universal Design housing.</p> <p>NDS WA acknowledges that the State Government has made significant investments in housing for people with disability as part of the State Budgets 2011-12 with \$95.7 million for homes for people with disability and 2013-14 through a commitment of \$6 million to establish suitable accommodation options for young people with disability currently in aged care facilities. The State Budget 2015-16 also included a new \$560 million Social Housing Investment Package, although this funding was not specific to people with disability.</p>	
Critical Action Required		Steady Progress Made
		Significant Progress Made

Policy Issues	Comments	Score
Accessibility	<p>The ability to move around the community underpins all aspects of life for people with disability and critically impacts their economic and social participation.</p> <p>NDS WA applauds the State Government's 2014 announcement to increase court-imposed penalties for misusing ACROD parking bays from \$1,000 to \$2,000 and on-the-spot fines from \$120-\$140 to \$300. However, ACROD permit holders must have full access to designated parking bays at all times and there is more that can be done to deter the misuse of these parking bays by people without a mobility disability. Further changes are required that amend existing ACROD legislation to allow for prosecution for private property ACROD bays and address monitoring and compliance issues, as well as funding for an ACROD communication and education campaign. Similarly, NDS WA commends the State Government decision to invest \$2 million over the next two years to develop a State-wide network of Changing Places which will provide more opportunities for people with disability to participate in community life. NDS WA is of the view improved access to Changing Places can best be delivered through the Companion Card program.</p> <p>Despite progress with improving the accessibility of public transport, there is still some way to go before all public transport is fully accessible for people with disability in Western Australia. Taxis in particular remain an important transport solution for people with disability and specific action is required to improve services for people with disability.</p>	
Health	<p>The State Government has made some progress toward reforms to improve the health and well being of people with disability by supporting the recommendations of the Clinical Senate of Western Australia, the launch of the Disability Health Network, the development of a draft Western Australia Disability Health Framework 2015-2025, and the establishment of the Health and Disability Services Complaints Office. NDS WA highlights to Government that there is a range of critical issues related to the health of people with disability across Western Australia that require resolution including improving health system capability, more effective prevention and early intervention programs and ensuring the Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015-2025 is adequately resourced to accommodate the needs of people with disability.</p>	

Policy Issues	Comments	Score
Sector sustainability	Government investment in the Western Australian disability services sector has been strong through its Procurement Reform and sustainability funding. The momentous decision to provide \$604 million to the community sector has significantly contributed to building a sustainable disability services sector in our State. NDS WA has also received significant funding since 2008 for procurement reform and sector sustainability projects.	
Overall	<p>Total spending on disability services in Western Australia has increased by 122 per cent since 2008 with most of the increase derived from the State Government. The DSC budget for 2015-16 will be \$964 million including contributions from the Australian Government and other income sources. The Western Australian Government will provide \$717 million of the total. This significant level of funding goes a long way to supporting people with disability, their families and carers.</p> <p>The State Government has demonstrated a strong ongoing commitment to deliver better outcomes for people with disability in Western Australia. While substantial progress has been made on some of the policy priorities identified by NDS WA, there remain some outstanding issues highlighted in this submission which need to be urgently addressed in the next State Budget. Important challenges are to roll-out a NDIS across Western Australia that is based around local decision making and ensures people with disability exercise true choice. The State Government must continue to invest in improving the lives of people with disability across all its portfolio areas in addition to its investment in the NDIS to fulfil its obligations to implement the National Disability Strategy.</p>	
<div>Critical Action Required</div> <div>Steady Progress Made</div> <div>Significant Progress Made</div>		

Summary of Key Budget Priorities

PRIORITY 1: Roll-out the National Disability Insurance Scheme

1. Commit to the transition and roll-out of a National Disability Insurance Scheme (NDIS) across Western Australia that is based around the core principles of choice, control and subsidiarity for people with disability where decisions are best made locally and as 'close to the ground' as possible. This new NDIS scheme must effectively interface with other State-controlled service delivery systems and be designed so that decision making and accountability is from the citizens it impacts meaning they will have strongest influence on the conditions that make up their lives.

PRIORITY 2: Supporting the Transition to a NDIS by developing a Disability Services Industry Plan and a NDIS Sector Innovation Fund

2. The State Government to provide strong support with the transition to an NDIS across WA by:
 - Investing in the Western Australian disability services sector to support the transition to a NDIS by supporting the development of a Disability Services Industry Plan. The Plan will focus on a diverse range of disability services for the benefit of people with disability improving their choice and control in an NDIS environment.
 - The consideration of the transfer of all government provided disability services to the non government organisation (NGO) sector building on the past and current performance of the sector. This would form an action of the NDS WA proposed Disability Services Industry Plan and also assist in the delivery of appropriate services where block funding is required in a NDIS environment across Western Australia.
 - Establishing a Western Australian NDIS Sector Innovation Fund that assists in building a strong disability services sector that provides increasing and diverse choice for people with disability in metropolitan, regional and remote locations across Western Australia. NDS WA specifically calls on the State Government to provide funding for a Shaping Services Project that explores options for:
 - Incentivising value for money services, promotes sector sustainability, innovation and continuous improvement that actively rewards improvement and added social value;
 - Projects that build regional sector sustainability should be funded as a priority including options for service providers to explore sharing quality and workforce systems, information technology and corporate services, and the provision of regional online training; and

- Exploring options for developing funding models that support the provision of high priority integrated service responses in partnership with the not for profit sector. A priority focus should be on the co-design of services for people with complex and high level disability support needs.
 - Supporting and resourcing the establishment of a disability research network in Western Australia that links with the NDS Centre for Applied Disability Research and can provide evidenced based information to assist the implementation of the NDIS.
 - Ensuring there is ongoing access to mainstream services for the almost 280,000 Western Australians with a disability who will not directly qualify for the NDIS. This will require continued investment in priority initiatives to meet State Government obligations to promote the National Disability Strategy across its departments and agencies alongside NDIS commitments which are focused on providing individual support for people with disability.
 - Continue the strong commitment to the Delivering Community Services in Partnership Policy (DCSP Policy) and indexation. In addition, as part of the ongoing review of the DCSP Policy there should be commitment to long-term contracting for disability services and retention of the existing positive funding and service agreement arrangements such as pricing that reflects the real costs of service delivery and advance timely payments to organisations.
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PRIORITY 3: Implement the Best No Fault Insurance Scheme

3. Commit to engage and work with NDS WA, DSC and other stakeholders in co-designing and developing the No Fault Insurance Injury Scheme announced in the State Budget 2015-16 and establish an Advisory Group to guide the implementation of the scheme from 1 July 2016.
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PRIORITY 4: A Comprehensive Approach to Preventing Abuse and Neglect

4. Ensure a comprehensive approach to preventing abuse and neglect by investing in the protection of people with disability through:
 - Funding ongoing development and continuous improvement of quality services and safeguards including pre-employment screening, sector wide workforce induction training and expanding the ChildFIRST initiative to include a support program for people with disability as vulnerable witnesses in giving evidence;
 - Ongoing funding for NDS WA to develop and deliver a comprehensive disability sector induction/orientation education and prevention package for the disability sector workforce including administrative staff, support workers, team leaders, CEOs and Boards. This will be a critical support for the roll out of the NDIS across Western Australia; and

- Work with NDS WA on better understanding, promoting and implementing of a process to enact Section 53 of the Disability Services Act, specifically as it relates to the powers of the DG in prosecuting \$4,000 fine or 12 months jail term for individuals who abuse or neglect a person with a disability.

PRIORITY 5: Stronger Investment in Education and Training

5. Prioritise the development of effective pathways to education and training for people with disability by strengthening the monitoring and implementation of the Disability Education Standards and focusing on building effective school to vocational education and training (VET) and work transition points. Specifically provide ongoing resources for the NDS WA transition to work initiative.

PRIORITY 6: Investment in Employment Solutions

6. Build the economic security of people with disability by developing a Disability Employment Action Plan that invests in employment solutions including the State public sector. This investment in a coordinated Government strategy to achieve better employment outcomes for people with disability is critical and should incorporate:
 - Resourcing the effective implementation of the State Government Disability Employment Strategy and demonstrating that the Western Australian public sector will lead the way in improving the employment participation and inclusion of people with disability in our community;
 - Creation of a Disability Employment Services Coordinator to better align employment opportunities in the State public sector with prospective Disability Employment Services employees;
 - Funding for the continuation of the Payroll Tax Exemption initiative for employers who hire a new employee with a disability. The \$5 million provided over four years for the existing program ceases in 2015-16. It is critical that ongoing funding is provided for this program that has benefited 2,100 new employees over four years; and
 - Providing specific employment funds for the NDIS to elevate the importance of work. This should include project funding to develop pre-employment readiness strategies with a focus on expanding the Ticket to Work Network as the NDIS is rolled out across Western Australia.

PRIORITY 7: Effective Housing Solutions for People with Disability

7. Fund a joint Disability Housing project for NDS WA, the DSC and the Department of Housing to implement key recommendations of the NDS/Curtin Housing Ownership and Affordability for People Living With Disability Report including a specific focus on implementing the recommendations as part of the transition to a full NDIS. The project should investigate options to bring forward future personal disability support funding for housing purchase, including developing models for implementation.

The project would also focus on developing and distributing a suite of disability housing publications to the social housing sector, disability services sector, Local Area Coordinators, the commercial real estate sector, the building and real estate industries, public accountants, and people living with disability. The publications will provide information on:

- The range of policies, programs and disability service organisations available;
- Details on disability loan products such as their intended target demographic and intended purpose, and information on further steps and risks for each product;
- A comprehensive schematic view of the policies, agencies and programs in this area;
- A comprehensive description of affordable rental arrangements for people with disability; and
- An enhancement of guidance, strategies and exemplars for adopting Universal Design principles for the building industry and consumers.

The initial focus of the project will be to undertake this work and prepare this information for full NDIS implementation.

At a whole-of-Government level it is recommended that the State Government develops in partnership with NDS WA, disability services sector organisations, people with disability, Government housing departments, community housing providers, and the private housing sector an overarching whole-of-Government comprehensive housing policy for people living with disability in Western Australia that;

- Explores systemic options to address housing affordability cost issues including rebating or removing the requirement to pay any duty related to personal home purchases by people with disability, better targeting disability access to the First Home Owners Grant, and reassessment of existing Government-supported loan products recognising disability income levels and the additional costs for people with disability in owning or renting a home;
- Increases the supply of accessible housing by mandating that Universal Design principles be incorporated in all new social housing projects or any refit or renovation of housing projects undertaken by Government;

- Develops a Universal Design Ratings Code for housing in Western Australia and investing in the development of Universal Design Star Rating system in partnership with NDS WA and the private sector;
- Introduces a State-wide affordable housing levy that guarantees 3 per cent of the total floor area for all new residential housing developments is used for affordable housing and that all affordable housing built under this levy must meet the gold level Liveable Housing Australia accreditation standards;
- Explores options to mandate that all future property developments must assign a predetermined allocation for the provision of universal housing;
- Reassess existing Government-supported loan products such as Keystart and consider better communication of these products to people with disability;
- Reassess the operation and effectiveness of rent and housing assistance programs for people with disability; and
- Develops options to address the specific housing needs of people with disability living in regional and remote areas of Western Australia.

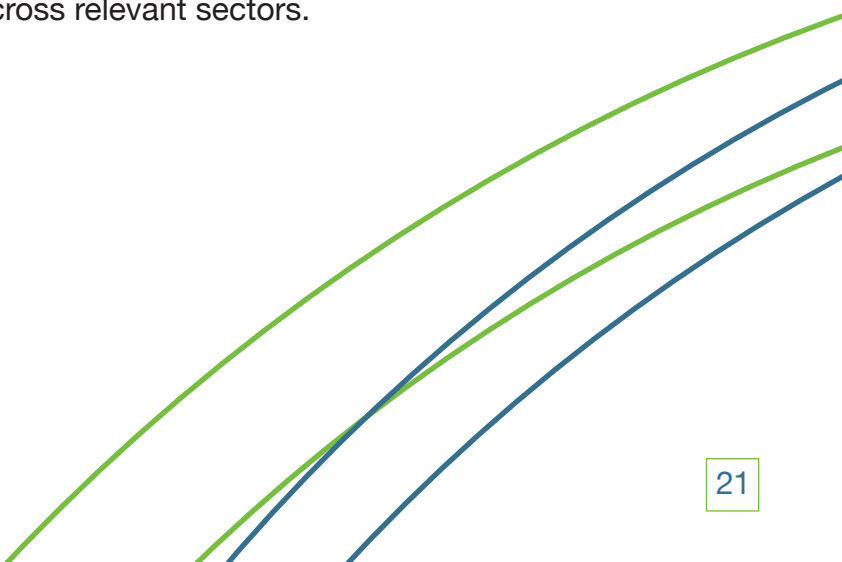
PRIORITY 8: Improving Access and Inclusion

8. Funding to improve the accessibility of community services for people with disability by:
 - Providing project funding to NDS WA to explore options to improve access to Changing Places facilities including developing access technology through the NDS WA Companion Card and mobile phone applications;
 - Stronger enforcement of ACROD Parking including the introduction of a demerit point penalty, on top of the existing fine regime for able bodied people found guilty of abusing ACROD disabled car parking spaces, amending existing ACROD legislation to allow for prosecution for private property ACROD bays and address monitoring and compliance issues, as well as funding for an ACROD communication and education campaign. This would explore options to better utilise social media to promote the ACROD Parking program. Options to develop an on-line ACROD permit system enabling people with disability to access the permits on-line should also be explored; and
 - In addition, options enabling people with disability to book Companion Card tickets on-line need to be developed.
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PRIORITY 9: Addressing Transport Accessibility

9. Funding to develop a comprehensive long-term disability transport strategy for people with disability in Western Australia to ensure there is, as far as possible, whole of journey accessibility which enables them to effectively participate in economic and social community activity. A specific priority is a renewed commitment to ensuring a reliable, accessible and respectful taxi service for people with disability in Western Australia.
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PRIORITY 10: Improving Health and Well Being Outcomes

10. Invest in a range of health promotion and intervention programs to raise awareness of and redress the health inequities of people with disability including;
 - Prioritise the work of the Disability Health Network and finalise the Western Australia Disability Health Framework 2015-2025. It is recommended that the Framework and draft Hospital Stay Guideline for Hospitals and Disability Service Organisations be considered in the context of the roll-out of the NDIS across Western Australia;
 - Developing a strategy that focusses on improving service integration between the Department of Health and the DSC for people with disabilities, especially those who have complex disabilities. This should include a range of health support interventions e.g. nursing support, better utilising disability sector capacity to reduce unnecessary hospitalisation of people with disabilities, and coordinated service planning;
 - Annual health checks for people with disability and, a targeted health promotion campaign. Funding should be provided to phasing in these programs in the NDIS; and
 - It is also strongly recommended that the Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015-2025 developed by the Mental Health Commission, the Drug and Alcohol Office and the Department of Health be further enhanced by a more specific focus on the needs of all people with disability, and in particular those with high and complex support needs. The plan needs to be supported by an extensive funding implementation strategy that is innovative and focuses on service integration across relevant sectors.
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Pre-Budget Submission in Detail

The Six National Disability Strategy Policy Outcomes

1. Personal and Community Support

Inclusion and participation in the community, person-centred care and support provided by specialist disability services and mainstream services, informal care and support.

2. Rights Protection, Justice and Legislation

Statutory protections such as anti-discrimination measures, complaints mechanisms, advocacy, the electoral and justice systems.

3. Learning and Skills

Early childhood education and care, schools, further education, vocational education; transitions from education to employment; life-long learning.

4. Economic Security

Jobs, business opportunities, financial independence, adequate income support for those not able to work, and housing.

5. Inclusive and Accessible Communities

The physical environment including public transport, parks, buildings and housing, digital information and communications technologies, civic life including social, sporting, recreational and cultural life.

6. Health and Well Being

Health services, health promotion and the interaction between health and disability systems, wellbeing and enjoyment of life.

Introduction

The National Disability Strategy

The NDS WA Pre-Budget Submission 2016-17 is focused on the role State Government departments and agencies should play in honouring the Government of Western Australia's commitment to the National Disability Strategy.⁷

The National Disability Strategy, an initiative of the Council of Australian Governments, is a national approach to improving outcomes and whole of life opportunities for people with disability in Australia agreed by all levels of Government including the Government of Western Australia. The strategy provides a commitment to an inclusive Australian society that enables people with disability to fulfil their potential as equal citizens.

This strategy plays an important part in guiding Government activity across mainstream and disability-specific areas of public policy as well as actions by the whole community to drive better outcomes for people with disability over the next ten years.

The strategy particularly recognises that ensuring people with disability can participate fully in the life of our community requires more than just adequate disability support services, although these are critically important. Full participation also requires openness and flexibility across the full range of Government and community services and within the broader community, as well as a community-wide commitment to providing equal access to all.

The National Disability Strategy builds on the significant work undertaken to date by all Governments. The National Disability Agreement, signed by the Australian, and all State and Territory Governments in 2008, was an important first step towards a new, cooperative approach to supporting Australians with disability. With its ratification in 2008 of the United Nations Convention on the Rights of Persons with Disabilities, Australia joined other countries in a global effort to promote the equal and active participation of all people with disability.



1.

Personal and Community Support

PRIORITY 1: **Roll-out the NDIS in Western Australia**

Summary

NDS WA highlights to Government that it is critical that the long-term social and economic gains of the National Disability Insurance Scheme (NDIS) are fortified – this requires secure funding for full implementation, resolution of outstanding design issues with an ongoing commitment to co-design, and investment in transition support and in a sustainable disability support workforce.

NDS WA advocates that the full transition to a NDIS across Western Australia be based around the principles of a local decision making model supported by a national framework with responsive local governance, consistency and quality standards. The model should ensure a NDIS pricing regime that provides supports and services that recognises that an ‘efficient price’ must allow for different market conditions in Western Australia and one that is based on an appropriate analysis of current operational data. It must consider the interrelationship of pricing, provider financial stability, workforce capacity and the sustainability of the NDIS.

The Issue

Across Australia there has been significant progress over the past 18 to 24 months in introducing the NDIS. Legislation establishing the scheme passed with unanimous support, the Australian Government 2013-14 Budget announced a long-term funding plan to implement the scheme across Australia, there was unprecedented public support for adding 0.5 per cent to the Medicare Levy to help fund the scheme, the Australian Government reached agreement with seven States and Territories to fully implement the NDIS by 2019, the NDIS survived a fiscally tight 2014-15 budget, and the scheme has launched in seven States and Territories through trial sites which will inform its full implementation.

Although much has been achieved, there is considerable work that is yet to be done. The progress must be embedded, sustained and built on. There is unquestionable support across political parties and Governments for the NDIS which will continue to be critical to ongoing progress.

In Western Australia, NDS WA welcomed the signing of the agreements on 31 March 2014 by the Premier and Prime Minister that provides the foundation for the trial of the NDIS in Western Australia. It was very pleasing that both the State and Australian Governments committed significant additional funding of over \$100 million to the trials to ensure people with disability are able to access the 'reasonable and necessary' support they need to live a good life in their local community. The State Government contribution is \$58 million.⁸

The agreements detail the unique Western Australian arrangement which see two different models of service trialled and independently evaluated. On 1 July 2014, the State Government WA NDIS My Way trial implemented under State legislation and managed by the State Government's Disability Services Commission (DSC) commenced in the Lower South West region. The Cockburn-Kwinana area joined the trial on 1 July 2015. The My Way trial builds on the strengths of the current Western Australia disability services system.

The second trial is in the Perth Hills area run by the National Disability Insurance Agency (NDIA) and implemented under Commonwealth legislation.

The current NDIS trials are over halfway through implementation and subject to an independent evaluation to assess their merits. The NDIS is a huge national reform – but its shape and form must meet the needs of people with disability in our State. Western Australia's early sector feedback points to a better experience for people with disability on the State's My Way model which is based on the principles of a localised decision making model. This submission supports the independent evaluation of the NDIS My Way and NDIA models to inform how disability services in Western Australia will be provided into the future.

A priority theme of our PBS 2016-17 is to ensure that NDS WA works in partnership with the State Government to ensure the roll-out of the NDIS across Western Australia delivers the best possible outcomes and support system for people with disability in our State and to continue to put into practice the principles and behaviours of the State Government DCSP Policy. It is critical to ensure that people with disability and the disability services sector have a strong voice and influence the practical design of the full NDIS implementation in Western Australia.

Experience has shown us that local management has facilitated good and sensible outcomes over many years. NDS WA sees the benefit of local decision making and ensuring people with disability can exercise true choice and therefore, remains receptive to exploring an NDIS model based on localised decision making principles. The heart of disability services in Western Australia is in its focus on people and their quality of life. It is integral that the NDIS in our State be designed so that decision making and accountability is from the citizens it impacts; giving them the strongest influence on the conditions that make up their lives.

Coordination of community and human services is most effective when it is grounded in local reality. Shaping coherent service systems requires devolved funding decisions and accountability. NDS WA is of the view that it is critical that the selected NDIS model utilise existing State systems and relationships to build a sustainable marketplace and to link with other State-administered services. It must emphasise the importance of locally visible and accountable decision makers.

NDS WA advocates that the localised Western Australia NDIS model be supported by a national framework with responsive local governance, consistency and quality standards. The model would be best implemented by a deep understanding and knowledge of the local environment and to better respond to the needs of people with disability in Western Australia.

It is important that the roll-out of the NDIS across Western Australia take into consideration the findings of the independent evaluation of the two NDIS trial sites in Western Australia, supported by credible evidence based data and underpinned by comprehensive engagement with the disability services sector and people with disability

To support this transition NDS WA recommends that the State Government invest in establishing a NDIS Sector Innovation Fund to build a strong disability services sector that provides increasing and diverse choice for people with disability in metropolitan, regional and remote locations across Western Australia. NDS WA specifically calls on the State Government to provide funding for a Shaping Services Project that explores options for:

- Incentivising value for money services, promotes sector sustainability, innovation and continuous improvement that actively rewards improvement and added social value;
- Projects that build regional sector sustainability should be funded as a priority including options for service providers to explore sharing quality and workforce systems, information technology and corporate services, and the provision of regional online training; and
- Exploring options for developing funding models that support the provision of high priority integrated service responses in partnership with the not for profit sector. A priority focus should be on the co-design of services for people with complex and high level disability support needs.

Ensuring that the State Government retains a pivotal role in implementing the NDIS will also greatly assist to make sure that there is ongoing access to mainstream services for the almost 280,000 Western Australians with a disability who will not directly qualify for the NDIS and to building a stronger not for profit disability services system.

NDS WA is fully supportive of the implementation of the NDIS in Western Australia. It will make a significant difference to people with disability in our State, but the long-term commitment to a workable NDIS model and the timelines for implementation need to be resolved.

The Western Australian Disability Services Sector and the NDIS

Western Australia has a mature disability services system that has been carefully developed over the past 25 to 30 years to meet the unique requirements of the State. We consider the fundamental features of the existing Western Australian disability services system are sound and appropriate for the requirements of the State. Western Australia has been at the national and international forefront of reform in disability services for the past three decades. Local area coordination, individualised funding, flexible service responses, remote area strategies and a mature non-Government disability services sector were key features of the Western Australian system well before the recent calls for national reform.

For many years the Government of Western Australia has worked in a genuine partnership with non-Government service providers to build a contemporary service system that responds to the needs of people with disability, and their families and carers regardless of where they live in this vast State. This has been demonstrated through the successful transfer of services from DSC to the disability sector to date.

The Western Australia system promotes strong, enduring relationships between service users and Local Area Coordinators based in local communities, with minimal bureaucracy and a high level of customer satisfaction. There has also been a high level of success in linking people with disability with local community supports and mainstream services rather than relying solely on funded specialist disability service supports. In addition, the Western Australia system has effectively operated with low administrative costs; indeed for many years our State has reported the lowest administrative costs in the nation.

The size of Western Australia and the task of servicing regional and remote communities pose unique challenges, particularly in the context of implementing a NDIS State-wide. A highly centralised and bureaucratic 'one size fits all' system with rigid rules is unlikely to offer people with disability improved choice in services or to increase the level of services.

NDS WA is supportive of a NDIS being implemented in Western Australia that is based around the principles of a locally responsive decision making model. The experiences from the current trial sites is that the NDIS My Way model provides a range of advantages and unique features that suit the WA context. Components of the NDIA trial site model also provide benefits. NDS WA's assessment is that the optimal model for operationalising the NDIS in Western Australia must be based around the following principles. This should include consideration by the State Government to finalising the transfer of all government provided disability services to the NGO sector.

Key Principles - The 'Must Haves' for any NDIS in Western Australia

The disability services sector faces a period of substantial change and is at a critical juncture with the transition to the NDIS from the existing State based system.

The transition must be predicated on a commitment by all levels of Government to deliver a NDIS that is shaped and strongly influenced by people with disability and a focus around the principles of local decision making at all levels.

NDS WA's assessment is that the focus of the NDIS should be to provide maximum benefit to individuals with disability, their families and carers and build a strong, diverse and sustainable disability services sector.

The rollout and full transition to a NDIS across Western Australia also needs to build on the existing strong level of services that are provided in our State and lead the nation in many aspects of the design and delivery of disability services.

Local Decision Making at the Core of a NDIS

NDS WA sees the benefit of local decision making and ensuring people with disability can exercise true choice and control. Our particular focus is to fashion a NDIS that is the best possible and ensure that people with disability and the disability services sector have a strong voice and influence the practical design and full NDIS implementation in Western Australia.

The NDIS implementation will need to be sensitive to local conditions and circumstances, including in rural and remote regions. It must reflect the unique, diverse and vast geographical area of Western Australia and be implemented at sustainable prices. Getting this right means the sector can provide true choice, quality and value for people with disability.

This is critical given the size of the State and the task of servicing remote community's poses unique challenges. Contemporary disability services require a high level of flexibility and individual responses that are best delivered locally with grass roots decision making.

An NDIS that is based around local decision making provides:

- Better capacity for local decisions and assessments to reflect local circumstances;
- Better and higher level of community connection;
- Greater opportunity to minimise the level of bureaucracy and duplication by utilising existing infrastructure and resources already embedded in the Western Australian disability system. Such a model will be more cost effective and deliver more efficient outcomes for participants;
- Better access and connection to mainstream services and providers; and
- Greater opportunities for innovation and continuous improvement.

The Argument for Localised Decision Making and Whether it can be Best Delivered by a Federated or National NDIS Model

There has been much conjecture as to how a NDIS should be implemented across Australia: through a new Commonwealth agency, the NDIA, or utilisation of existing State structures through a federated model. The NDIS represents a fundamental redesign of the service system for people with disability in Australia.

The national scheme proposes to replace existing State systems with the aim of creating market conditions that will provide more control and choice to individuals through a single nationwide structure. This national entity will work to harmonise roles, responsibilities and operational practice across State boundaries. The scheme is currently in its trial phase before full implementation and during this time operational norms are being created and decisions made about the scope of the undertaking, as well as establishing unit pricing for a broad range of service types.

However, the harmonisation taking place is not just at the level of policy and the broad operational framework. It is also taking place across jurisdictions at the level of frontline operational decision making. In addition, a single specified 'market price' will be established that will apply in all States after 2016-17 for the supply of individualised support. There are three key problems with this pricing approach:

- Australia is not a single marketplace. It is made up a range of marketplaces reflecting local conditions including, among other things, the cost and availability of labour;
- Governments can influence markets but they do not set 'market price'; and
- The market price announced to come into effect after 2016-17 is between 25 and 32 per cent less than current actual market price across national jurisdictions.

NDS WA acknowledges that the work being undertaken at a policy level to harmonise how State Governments respond to the needs of citizens with a disability is both desirable and necessary; for example, agreeing eligibility, scope of commitment, establishing guiding operational principles and undertaking an Australian and State funding agreement.

However, it is not clear that moving beyond these parameters to establishing a central operational agency is the most effective or efficient means of establishing a robust market. Nor is it clear that a central agency is best suited to facilitate the delivery of front line local services at an efficient sustainable price to individuals whose needs are often not only complex but multi-faceted; requiring complementary services from other State-controlled service delivery systems such as housing, child protection, public transport, education, mental health and the like.

The creation of a more robust marketplace with more options available, informed customers, service providers who will survive or perish on the strength of their customer service and value for money is a strongly desirable goal that will benefit people with disability. However, facilitation of the development of this kind of sustainable marketplace requires a sound knowledge of local conditions as well as the ability to control the economic and other levers that create the conditions for this to occur.

In addition, because of the multi-faceted needs of individuals with a disability and the associated requirement for linkages between a range of State based service delivery systems, it raises the question as to whether a NDIS can be more effective where there is State local and responsive governance; albeit within an agreed national framework.

There is strong evidence that the States, and in particular in a large State such as Western Australia, are clearly better placed to understand their own market conditions and have greater power to create the necessary interface with other State-controlled service delivery systems. In addition, in keeping with the very important principle of subsidiarity, decisions are best made as close to the ground as possible; especially those impacting vulnerable or disenfranchised people. The further decision making and accountability are from the citizens it impacts, the less influence they are likely to have on the conditions that make up their lives. The imperative that control and choice for people with disability is the aim of the NDIS needs to mean more than having a choice between service provider A or B. It must also extend to a level of control where local decision making can influence the NDIS itself.

Western Australia has a strong history of innovation in services and support for people with disability and their families. This is typified by locally led service innovation, working in partnership with individuals with a disability and their families. This approach to disability policy and service delivery has provided leadership in Australia in that Western Australia developed individualised services, individual funding allocation, and portable funding for customers which facilitates control and choice around 15 years before any other Australian jurisdiction.

A further strength of Western Australia's existing system is the partnership between State Government and the not for profit sector and the strong collaboration between the sector, individuals and their families. This collaboration has been formalised in recent years through the DCSP Policy and the establishment of the Partnership Forum.

The service system has evolved based on a solid understanding of sustainability issues and the value the not for profit sector adds to social capital and social investment in our communities. There are good linkages between disability services and other State service systems which are especially important in crisis situations where an individual, a family or a child is at risk.

The current Western Australia system is in contrast to the future significant challenges of implementing a centralised scheme such as:

- Achieving the clear benefits of subsidiarity without State control and accountability to its citizens;
- Creating a sustainable marketplace based on local knowledge and conditions;
- Building on existing achievements and what has been demonstrated to work, rather than simply replacing it regardless;
- The capacity and ability of centralised funding agency to respond to crises that require an urgent response, especially outside office hours; and
- The absence of a State Minister who is accountable and accessible to citizens with a disability and what this means for giving effect to the principle of subsidiarity.

NDS WA agrees that from a citizen's perspective, there are clear considerations that need to be explored as to what level of Government within a federal context is best suited to the following requirements: facilitating local market development, being responsive to citizens for services that impact them locally, evaluating the performance of providers within a jurisdiction, safeguarding vulnerable individuals, having the capacity and capability to respond to individual crises at a local level, facilitating national policy development and operational guidelines, determining issues of eligibility and portability of funding across State boundaries, coordinating and reporting on outcomes and cost, and risk analysis of a NDIS system.

Clearly some of the above are better achieved by State Governments while others are best facilitated by the Australian Government. However, the Australian Government has already identified other key service areas such as health, education and housing that are deemed best operated by the States. The question is why the operation of disability services should be any different to the approach in other areas of service delivery to citizens.

NDS WA is of the view there is strong evidence that contemporary disability services require a high level of flexibility and individual responses that are best delivered locally. Experience on others sectors such as Health and Education indicates that in a highly centralised system responses are not appropriate for people living in regional and remote areas. There is strong merit to consider a collaborative localised decision making approach with broad policy parameters such as insurance principles, national eligibility, comparability in individual funding allocations set by the Commonwealth and operational responsibilities remaining with the State. Agreements on financial arrangements, performance reporting, transparency and data sharing will ensure that Western Australia will be operating the NDIS within the parameters of the national scheme.

Strong Local Partnerships and Engagement

A key strength of the Western Australia disability system lies in the partnership that exists between the State Government and the not for profit disability services sector, and the strong collaboration between the sector, individuals and their families.

The Government of Western Australia's DCSP Policy heralds a relationship based management approach to outcome based funding arrangements with co-design of services and greater consumer choice and control in the way services are provided. The DCSP Policy supports a relationship based on trust, respect and a mutual desire to achieve the best outcomes for Western Australians. The policy has assisted a service system to evolve that is based on a solid understanding of sustainability issues and the value the not for profit sector adds to social capital and social investment in our communities.

The DCSP Policy provides a platform to model relationships within a new NDIS environment in Western Australia.

There must be ongoing input from stakeholders to identify and resolve emerging issues quickly. The sheer scale of the NDIS calls for a structured approach to local engagement with formal avenues for regular feedback.

NDS WA is a key source of information, support and advice on the disability services sector's practical working experience of both Western Australia NDIS trial sites and provides a direct avenue for Government to have a reality check and to test implementation assumptions with providers. In this year's budgets submission NDS WA call on Government to invest in the development of a three year Disability Services Industry Plan 2016-2019 to guide the NDIS engagement and implementation process.

Connectivity with the National Disability Strategy

The new national NDIS scheme must effectively interface with other State-controlled service delivery systems and be designed so that decision making and accountability is from the citizens it impacts meaning they will have strongest influence on the conditions that make up their lives.

While the NDIS contains the hopes and hard work of so many around the nation it can never be a total solution and it is critical that all Governments continue to invest in improving the lives of people with disability in addition to the NDIS investment to fulfil the National Disability Strategy obligations. A strong commitment to, and investment in the Information, Linkages and Capacity Building; ILC Policy (formerly Tier 2) is essential.

NDIS only provides funding supports for individuals. There is a responsibility to continue to improve the social and economic inclusion of people with disability in our community by, for example, ensuring community facilities are accessible, providing affordable housing, improving participation in training and employment and access to justice.

The good linkages between disability services and other service systems at a State level must be preserved and enhanced. This is especially important in crisis situations where an individual, a family or a child is at risk and the system must be responsive to meet complex needs.

Strong National Policy, Consistency and Quality Standards

NDS WA advocates that the full transition to a NDIS across WA be based around the principles of a localised decision making model supported by a national framework with strong overarching policy, consistency and quality standards.

The model should ensure a NDIS pricing regime that provides supports and services that recognises that an 'efficient price' must allow for different market conditions in Western Australia and is based on an appropriate analysis of current operational data. It must consider the interrelationship of pricing, provider financial stability, workforce capacity and the sustainability of the NDIS.

There must also be consideration of achieving the right balance between safeguarding risk and heavy-handed regulatory process that diverts effort away from supporting people with disability into regulation red tape.

Building Sustainability

NDS WA is of the view that a single specified 'market price' that will apply in all States after 2016-17 for the supply of individualised support is problematic as there is not a single marketplace. There are a range of marketplaces reflecting local conditions such as the cost and availability of labour. NDIS must move from prescriptive itemised price lists to more flexible outcome based funding.

The comprehensive cost for services, which includes all direct and indirect costs, provides a truer picture of the cost of disability service delivery in Western Australia. It provides a more accurate pricing platform from which the NDIS can assess actual funding and pricing more accurately.

Rural and remote locations require a different approach including consideration of block funding within an individualised approach.

Considered Implementation

How, when and where the full scheme implementation is rolled-out needs to be carefully considered so the sector is supported to develop enhanced capacity and scale in a timely way and people with disability, their families and carers can exercise true choice and control about how and when services are provided and outcomes are improved.

Final decisions around the timeframe, location and cohorts transitioning to the NDIS in Western Australia should be communicated as soon as possible, allowing the sector to prepare and transition support. Certainty of timing will also help reduce anxiety among stakeholders.

A sustainable pace for implementation will be one which does not compromise quality or risk market failure.

Managing risks for not for profit providers is critical to ensuring that the transition to a NDIS does not negatively impact sector sustainability. Existing service organisations will be at greatest risk during the transition as they adapt to the disruptive impact of change and uncertainty. The disability services system cannot afford to lose valuable social capital, expertise and infrastructure. Risk needs to be managed with reasonable pricing facilitating access to working capital and policy settings or contracting processes that value diversity and the contribution of not for profit organisations.

Consideration must also be given to the appropriate level of additional investment required to ensure there is sufficient sector capacity to meet NDIS consumer demand. Achieving a rapid expansion of the sector requires effective, tailored support and development. Providers need to further develop proficient job design and rostering systems to attract and deploy additional workers. There should also be a formal commitment to open data sets: providers need early access to demand and supply information as they need to understand demand to make strategic business and investment decisions.

The NDIS Model Must be Informed by Learnings From the NDIS Trial Sites

It is vital that the commitment to the roll-out of the NDIS across Western Australia be informed by the findings of the independent evaluation of the NDIS trial sites, supported by credible evidence based data and underpinned by comprehensive engagement with the disability services sector and people with disability. NDS has established the NDIS Issues Register to capture areas of concern about the Scheme and experiences in the trial sites across Australia. Consideration should be given to these issues in the roll out of the NDIS across Western Australia.

Summary

NDS WA requests that the Government of Western Australia implements a NDIS across Western Australia which embeds the principles of a localised decision making model of reform. This will result in optimal outcomes for people with disability in Western Australia. The DSC is well placed as the lead agency for this reform.

A NDIS model that is based around local decision making at all levels provides:

- Better capacity for local decisions and assessments to reflect local circumstances;
- Better and higher level of community connection;
- Greater opportunity to minimise the level of bureaucracy and duplication by utilising existing infrastructure and resources already embedded in the Western Australian disability system;
- Better access and connection to mainstream services and providers; and
- Greater opportunities for innovation and continuous improvement.

The NDIS local decision making model should be supported by:

- The development of a Disability Services Industry Plan that provides for considerable investment in disability workforce strategies as suggested by the Australian Government Productivity Commission report of the public inquiry into Disability Care and Support to respond to the anticipated increase in demand for additional sector workers as a result of the transition to a NDIS;

The plan should also fill information gaps about the NDIS transition and impact of reforms, provide a comprehensive and easily accessible online information system for people with disability in Western Australia, and detailed consumer demand data to service providers that assists to identify new business opportunities in a competitive environment. As a minimum, the online system should provide information on the rights of people with disability, how to access supports in Western Australia and their quality;

- Nationally consistent quality assurance and minimum standards that are also embedded in State legislation. These should be and agreed to and developed by the Australian and State and Territory Governments following extensive consultation with industry;

- Consideration that supports should only be procured from services providers registered on the NDIA provider list under the NDIA or equivalent DSC provider list; and
- Recognition that block funding arrangements should be maintained in underdeveloped markets that are not sustainable for services to be provided in a competitive working environment and, or, in circumstances that carry a high risk of market failure. This is particularly important for a State as geographically large as Western Australia to ensure that participants in rural and remote areas where the costs of service provision are high have access to services that otherwise might be withdrawn from the market.

Features of a Localised Decision Making NDIS Model

Benefits for Individuals/ Families/Carers	Building a Strong, Diverse and Viable Disability Service Sector
<ul style="list-style-type: none"> • Non-bureaucratic, relationship based engagement with people accessing services (meeting people in their own homes and community settings). • One point of contact in the local community for all aspects of the scheme. • Local decision making – all key operational decisions made within the local environment. • Timely complaints resolution. • Primary focus on building informal networks and community based supports. • Integral role for Local Area Coordinators in all aspects of the scheme. • Integration in planning and service delivery between NDIS and mainstream services such as education and health. • Integration of individual planning with school to work transition. • Better interconnectivity with other service systems at a State level especially in crisis situations where an individual, a family or a child is at risk. 	<ul style="list-style-type: none"> • Integral role for non-Government disability service organisations in all aspects of the scheme, building on strong existing partnerships. • Mature pricing arrangements based on true cost of services and the principles of the Delivering Community Services in Partnership Policy that reflects this practice. • Payments in advance and a range of flexible payment options to service providers to better sustain the viability of not for profit providers, particularly in regional and remote areas. • Proactive sector planning and development, especially in regional and remote areas, will help the development of better remote area strategies. • A local decision making NDIS model potentially should deliver efficient individual package costs, when compared with the projected national average, improve administration costs and more effective scheme expenditure utilising existing infrastructure.

NDIS Transition - Finalise the Design with an Ongoing Commitment to Co-design

The ongoing commitment of the Australian and Western Australian Governments to the NDIS is appreciated by the disability services sector and the wider community. In moving to a more arduous 'learn and build' phase there is a need to consolidate progress, clarify future design decision making and confirm ongoing funding.

The sector needs certainty and confidence to bolster its ongoing effort to help transition the existing disability system into a system which more effectively and efficiently responds to growing demand. This will require a funding commitment that accommodates the NDIS once fully implemented from 2019.

NDS National research into the disability services sector indicates that more certainty is a prerequisite for adequate preparation and optimism about the future NDIS. This will give providers much needed confidence on the roll-out timetable. The process of transformation in trial sites has at times been complicated and stressful for providers, participants and Governments alike. Successful planning and transition to the full NDIS will continue to require stamina and strong leadership demonstrated through a clear commitment to an agreed timetable and transition process.

A critical element of success for an appropriate NDIS design will be active engagement with the views and experience of stakeholders. This principle of co-design must continue to be front and centre during the refinement and development of the scheme. Only through constructive and reciprocal discussions with the sector, people with disability, their families and carers will Government gain the full benefit of the trial site approach.

There are many more policy decisions to be made that must be informed through effective collaboration across many stakeholders. In particular, the following complex unresolved policy dilemmas require decisions and related agreements between Governments prior to full implementation of the NDIS:

- How best to address Information, Linkages and Capacity Building; ILC Policy (formerly Tier 2) funding for services such as information, advice and community development services, along with support for people with disability who do not qualify for NDIS, and support that cannot be sensibly or efficiently funded through charging individuals;
- How the NDIS should interface with other service systems such as health, mental health, education, justice and transport;
- How best to invest in stimulating accessible and affordable housing supply for people with disability;
- How to transition the State based quality and safeguard systems to a national risk based regulatory framework;
- How to shepherd the development of a contestable and a diverse market that responds to the reasonable needs and preferences of NDIS participants in all regions across Western Australia;

- How best to escalate the scheme from catering for about 30,000 participants in June 2015 to about 460,000 participants with full implementation across Australia; and
- How to develop a larger and appropriately skilled workforce.

Collaboration with stakeholders in the process of finalising the NDIS design cannot be taken for granted, efforts must be made to seek views, allow sufficient time for meaningful consultation and to ensure a genuine two-way dialogue.

Viable peak bodies such as NDS WA are important for effective engagement. For example, a central trial site challenge has been getting pricing right. NDS WA collaborated with the National Disability Insurance Agency (NDIA) on a joint pricing project that took this challenge forward. There is still much more to be done to figure out pricing, but what is clear is that this work cannot always be effectively done through contracted or consultant relationships. Rather, there needs to be capacity in the sector to engage in partnerships and genuine collaboration with Government agencies to develop robust policy solutions.

There must be provision for funding by State and Australian Governments to support stakeholder engagement in co-design processes for refining the NDIS, and this includes core funds for peak bodies.

Recommendations For Action

1. Commit to the transition and a roll-out of the National Disability Insurance Scheme in 2016-17 across Western Australia that is based around the core principles of choice, control and subsidiarity for people with disability where decisions are best made locally and as 'close to the ground' as possible. The Western Australia NDIS must effectively interface with other State-controlled service delivery systems and be designed so that decision making and accountability is from the citizens it impacts meaning they will have strongest influence on the conditions that make up their lives.



2.

Personal and Community Support

PRIORITY 2: **Develop a Disability Services Industry Plan**

Summary

NDS WA supports the development of a Disability Services Industry Plan to facilitate investment in the sector. This initiative will better target the policy priorities of the National Disability Strategy.

The State Government must also continue to invest in priority initiatives to meet its obligations to promote the National Disability Strategy across State Government departments and agencies as well as meeting its commitments to the NDIS which are focused on providing individual support for people with disability.

The Government of Western Australia needs to proactively champion the Strategy. This requires a recommitment to the social and economic imperatives that underpin the strategy, investment in monitoring and measuring outcomes, and tangible progress on actions arising in disability policy reviews across the justice, housing, education and transport sectors.

This is a critically important issue and must accompany the planned roll-out of the NDIS across Western Australia.

The Issue

Disability Services Industry Plan

To progress the implementation of the National Disability Strategy and support the transition to a NDIS model across Western Australia in a coordinated and comprehensive way, it is critical that a Disability Services Industry Plan is developed. This will ensure ongoing provision of mainstream services to those outside the NDIS eligibility envelope and build a stronger disability services system. This is critical given the size and complexity of considerable disability reform that is occurring both at national and State levels.

Realising the ambitions of the National Disability Strategy is both contingent on, and essential for, successful implementation of the NDIS. The Strategy must guide actions across Governments and across portfolios to create an inclusive community: from public transport to housing design, from education to employment, from the justice system to health. Otherwise the NDIS cannot viably increase the social and economic participation of people with disability and their families.

The NDS WA vision for the Disability Industry Plan is outlined below. It comprises the priorities in our Pre-Budget Submission 2016-17 which should guide the development of a NDIS Industry Plan that assists in transitioning the sector to the NDIS.

Alignment of Disability Priorities for 2016-2017

Disability Priorities	
National Disability Strategy Policy Areas	Policy Action Areas
Personal and Community Support	<ul style="list-style-type: none"> • Roll-out of NDIS model across Western Australia based around the core principles of choice, control and subsidiarity for people with disability where decisions are best made locally and as close to the ground as possible. • NDIS Sector Readiness programs including workforce development. • NDIS Future Sector Development project. • Commitment to monitor the implementation of the National Disability Strategy. • Development of a Western Australia Disability Research Network. • Co-designing and developing with key stakeholders through an Advisory Group a No Fault Insurance Scheme as announced in the State Budget 2015-16. This will guide the implementation of the scheme from 1 July 2016.

Rights Protection Justice and Legislation	<ul style="list-style-type: none"> • Comprehensive strategies to deal with abuse and neglect including complaints management and handling. • NDS WA is funded to develop a disability sector induction/orientation education package to administrative staff, support workers, team leaders, CEOs and Boards.
Learning and Skills	<ul style="list-style-type: none"> • Strengthening the monitoring and implementation of the Disability Standards of Education. • Develop effective pathways to education and training for people with disability focusing on building effective school to VET and work transition points (VET Participation Project and Transition to Work project).
Economic Security	<ul style="list-style-type: none"> • Disability Employment Action Plan <ul style="list-style-type: none"> ▶ Adequately support and resource the State Government's Disability Employment Strategy to ensure the Public Sector Commission is able to implement its initiatives including promoting and monitoring employment of people with disability in the public sector and the implementation of the Strategy; to strengthen accountability mechanisms; and appoint disability champions across the State public sector to promote disability employment. ▶ Funding for a sector based project administered by NDS WA to promote, coordinate and broker State Government employment opportunities with Disability Employment Services. ▶ Provide specific employment funds for the NDIS to elevate the importance of work. This should include project funding to develop pre-employment readiness strategies with a focus on expanding the Ticket to Work Network as the NDIS is rolled out across Western Australia.

	<ul style="list-style-type: none"> ▶ Funding to continue the Payroll Tax Exemption initiative for employers who hire a new employee with a disability beyond 2015-16. ▶ Funding for a Western Australia community awareness campaign to promote the benefits of employing people with disability to the not for profit and private sectors. • Action key recommendations of the NDS/Curtin Housing Ownership and Affordability for People Living With Disability Report including a specific focus on implementation in the NDIS.
Inclusive and Accessible Communities	<ul style="list-style-type: none"> • Project funding to NDS WA to explore options to improve access to Changing Places facilities including developing access technology through the NDS WA Companion Card and mobile phone applications. • ACROD Parking Program - stronger enforcement of compliance and community education, and develop on-line ACROD permit system. • Develop options enabling people with disability to book Companion Card tickets on-line. • Develop a comprehensive long-term Disability Transport Strategy. • Disability Transport Standards - audit and monitoring of outcomes. • London taxi cab trial and multi-purpose taxis (MPT) coordination. • Develop options enabling people with disability to book Companion Card tickets on-line.

Health and Well Being

- Prioritise the work of the Disability Health Network and finalise the Western Australia Disability Health Framework 2015-2025. The Framework and draft Hospital Stay Guideline for Hospitals and Disability Service Organisations be considered in the context the roll-out of the NDIS across Western Australia; Investment in health promotion and intervention programs to raise awareness of and redress the health inequities of people with disability including:
 - Annual health checks for people with disability; and
 - A targeted health promotion campaign.
- Ensure that the Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015-2025 has a specific focus on the needs of all people with disability. The plan to be supported by an extensive funding implementation plan that is innovative and focuses on service integration across relevant sectors.

Disability Services Industry Plan

POLICY OUTCOME

Enabling People With Disability to Exercise Choice and Control Over Their Support

POLICY ACTION 1

- Enhancing consumer information.
- Building skills to engage with the NDIS.
- Developing tools to promote plan management skills.
- Building quality systems to enhance consumer safeguards.
- Building advocacy services for individuals.

POLICY OUTCOME

Developing NDIS Services – A Diverse and Sustainable Range of Suppliers

POLICY ACTION 2

- Consideration of the transfer of all government provided disability services to the NGO's building on past and current performance of the NGO sector.
- Enable existing and emerging suppliers to mature through transition support programs, such as developing and securing Information and Communications Technology systems for administering individualised funding.
- Support to attract new suppliers.
- Establish a NDIS Sector Innovation Fund to promote an environment for innovative planning and delivery of supports including practical business change management, service innovation, and research and evaluation.
- Build continuous improvement for quality systems and effective safeguards.
- Develop effective price signals through evidence based research.
- Identification of undeveloped markets that should be maintained through block funding arrangements to mitigate high risk of market failure.
- Provide support in rural and remote locations and thin market segments.

POLICY OUTCOME

Building the Workforce to Support People With Disability Into the Future

POLICY ACTION 3

- Assisting the sector to build a sustainable and diverse workforce.
- Encourage innovative and efficient use of the workforce and support organisations in the changing operational NDIS environment through the NDS Workforce Capability Framework.
- Development of a long term skilled workforce plan to support the NDIS.
- Developing a long term strategy that profiles disability services as an attractive career option, including the expansion of the *Carecareers* initiative or an equivalent.
- Industry programs that focus on diversifying the workforce, including opportunities for people with disability, school leavers, indigenous people, carers and more.
- Exploration of proficient job design and systems that encourage better alignment between workers and participants on work hours, including resolving tensions between the demand for flexible employment in home and community and the need for fair, safe and attractive working conditions.
- Skills development and training, including developing both the capacity to support people with complex needs and leadership.
- Collecting workforce data to inform planning at national, state, regional and organisational levels.

Key Components

Support for Sector Transition to full NDIS Implementation

No matter how good the design of the NDIS, it will not fulfil its promise if the non-Government sector is ill-equipped to implement it.

The importance of investment in preparing the sector cannot be overstated. The NDS National Business Confidence Survey found that only 33 per cent of organisations surveyed met the recommended cash flow standard of three months or more spending reserves. This creates a significant viability risk and organisations will likely need temporary access to financial assistance. They will need support now to get ready for the full transition to the NDIS in WA.

Providers also require assistance to develop and secure Information and Communications Technology (ICT) systems for administering and reporting NDIS funding and to improve their digital proficiency. Half of those surveyed currently lack the internal capacity or ICT systems to improve services.

Transition Support Also Needs to Promote Innovation

The NDIS will require service organisations to build on existing service responses for personalised responses to the choices of people with disability and their families. Ultimately, individual outcomes rather than aggregated outputs will be the focus. NDS WA has embarked on some initiatives that support the re-design of services and the strengthening of a person centred culture, however ongoing investment is required to further build this momentum.

Partnerships between people with disability, disability organisations and the broader community could help drive new and diverse approaches to the provision of support. Investment in research and evaluation would also drive service innovation.

The Western Australian State Budget 2016-17 should support sector transition, including practical business change management, service innovation, and research and evaluation.

Prioritise Disability Workforce Development

NDS led a national consortium that developed comprehensive advice for the Australian Government on a National Disability Workforce Strategy. This was provided to the Department of Social Services in September 2014. The recommended actions should be agreed across Governments with some urgency and budget allocated to implement them – the time is now. Nationally, an estimated 100,000 additional workers will be required, as will greater worker diversity and new skills. Achieving this growth will build on existing labour market trends but requires significant additional investment.

In particular, transition funding will need to be identified for:

- Developing long term strategies that profile disability services as an attractive career option, especially through the expansion of the *Carecareers* initiative which should be implemented in full, across the State;
- Industry programs that focus on diversifying the workforce, including opportunities for people with disability, school leavers, indigenous people, carers and more;
- Exploration of proficient job design and systems that encourage better alignment between workers and participants on work hours, including resolving tensions between the demand for flexible employment in home and community and the need for fair, safe and attractive working conditions;
- Skills development and training, including developing both the capacity to support people with complex needs and leadership; and
- Collecting workforce data to inform planning at national, regional and organisational levels.

NDS WA notes a concerning trend in the industry skills sector which appears to be focusing on ‘trade sectors’ of the economy at the expense of other sectors. NDS urges the State Government to recognise the significant economic impact of the community and social services sectors in relation to its expenditure, the quality of its service outcomes and as the largest employer. Government must further invest in the disability services workforce to accommodate the anticipated increase in service demand resulting from the NDIS.

NDS has developed the Workforce Capability Framework to support organisations in the changing NDIS operational environment. It is a robust, consistent and transparent framework that can be used to guide all people management strategies. Aligning workforce to business strategy will be critical to the success and sustainability of organisations providing services under the NDIS.

Shaping Future Disability Services

A key ambition of the NDIS design is to use market principles and competition policy to create a vibrant disability support market that offers choice and control to people with disability and their families. NDS WA fully supports the principles of choice and control but we acknowledge that market approaches have not been fully tested in all human service environments. We urge a cautious and evaluative approach.

What is clear from the experience in the NDIS trial sites, is that there are caveats that must be applied to notions of ‘choice and competition’ for this market reform to be effective. For example, there is a need to strengthen information provision to ensure informed consumer choice, especially for the most vulnerable participants and those with additional communication support needs.

Undeveloped Services

Block funding arrangements should be maintained in undeveloped service locations that are not profitable enough for services to be provided in a competitive environment and as a result, carry a high risk of market failure. This will ensure that in some rural and remote areas, where the cost of providing services are particularly high, participants will continue to receive supports that would otherwise be withdrawn.

Where block funding arrangements are maintained, the State Government should monitor and conduct regular reviews that assess the efficiency, contestability and quality standards of these underdeveloped service markets through appropriate advisory mechanisms. This should be conducted in partnership with the Government sector, disability advocacy organisations and people with disability. If undeveloped service locations are exposed to only individualised or self-directed funding models there should be a long transition period. Measures should be considered that provide incentives for disability service providers to deliver a range of high quality supports in these markets, including employee benefits such as cost of living support or taxation incentives, or investing in community infrastructure. This activity should also be consistent with the State Government's DCSP Policy.

Based on the successful history and the successful transfer of services from DSC to the disability sector to date, NDS WA is of the view that the Government of Western Australia should give consideration to the transfer of all services to the NGO's building on past and current performance of the sector. This would form an action of the NDS WA proposed Disability Services Industry Plan and also assist in the delivery of appropriate services where block funding is required in a NDIS environment across Western Australia.

Conserving the Not For Profit Sector's Creation of Social Capital

NDS WA would like the implications of market design, particularly on the not for profit sector, explored more fully. It is important that Government recognises both the social and economic value of maintaining a thriving not for profit sector. The value that the not for profit sector brings cannot always be contracted for. There is otherwise real risk that major social and community infrastructure, built up over decades from not for profit own source revenue, government funding and philanthropic contributions, will disappear in the transition to a human service industry such as the NDIS.

It is the job of not for profit providers to promote and market their mission and role in the community. However, funders, regulators, and Governments as purchasers also play a role in acknowledging and supporting the altruistic and community building missions of not for profit providers. They can do this by offering some preferential treatments in market regulation and contract competition.

NDIS Sector Innovation Fund

To support the transition to a NDIS and the activities outlined above, NDS WA recommends that State Government gives consideration to establishing a NDIS Sector Innovation Fund.

These funds will be utilised to continue to build a strong NDIS-responsive Western Australian disability services sector that provides increasing and diverse choice for people with disability in metropolitan, regional and remote locations across Western Australia.

NDS WA specifically calls on the State Government to provide funding for a Shaping Markets Project that explores options for incentivising value for money services, promotes sector sustainability, innovation that actively rewards continuous improvement and added social value.

Our discussions with regional service providers and Council of Regional Disability Service organisations highlight priority areas of work including options to develop efficient business models enabling sharing of information technology and corporate services, regional online training around quality systems and effective safeguards, supervision and rostering.

Government Should Retain an Industry Service Stewardship Function

In human services, Governments, and regulators, cannot distance themselves from the quality of services in the same way that they can in some other industries. The resulting regulation means that human service markets are ‘quasi-markets’ and modelling based on ‘free markets’ cannot be accurately applied. We do not yet know what the best facilitative policy settings are and this lack of clarity must be addressed through investment in monitoring, facilitation and development initiatives.

It is important to invest in collecting information about the impact of ‘choice and competition’ reforms, not just on consumers but also on the whole disability sector. This information should be used to anticipate and address potential market failure. Information needs in a disability market include:

- Market structure and composition;
- Financial sustainability of providers and changes to aggregate financial balances;
- The impact on volunteer hours and the impact on charitable giving;
- Business confidence; and
- Level of choice and change exercised by consumers and related transaction costs.

Most of this information is not currently measured in the disability services sector, yet it is critical to understand how services function under the NDIS, particularly during the transition phase. The State Budget 2016-17 should support facilitation of the disability services market which includes information collection and targeted investment in sector development. In this year’s PBS NDS WA calls on the State Government to support the transition to a NDIS by funding the development of an Disability Services Industry Plan that will support these initiatives.

Develop a Western Australian Disability Research Network

In 2012, the Disability Policy and Research Working Group, representing intergovernment disability officials engaged the Centre for Disability Research and Policy, University of Sydney to prepare a report on the audit of disability research in Australia. The Audit was undertaken by the Centre for Disability Research and Policy, University of Sydney with team members from People with Disabilities Australia (PWDA), National Disability Services (NDS) and University of Melbourne. The Audit team was supported by an Advisory Committee representing NGOs in the sector, DPOs and the DPRWG.⁹

The focus of the audit of disability research was to provide a comprehensive picture of the current state of disability research in Australia. This included exploring and determining the gaps in disability research evidence to target areas that have not been efficiently resourced previously or where there has been little research to date.

The Audit's main finding was that the current disability research base is not 'fit for purpose' to the reform agenda and is fragmented and diversified across topics and study designs. There is not a critical mass of research on topics of priority to the National Disability Strategy, the National Disability Research and Development Agenda and the National Disability Insurance Scheme. Significant strategic and systematic investment in Australian disability research relevant to the national policy context is urgently needed to advance research informed policy in Australia.

NDS WA supports the findings of this Audit. It is our assessment that Western Australian and Australian disability research is fragmented, often not accessible, and does not adequately drive disability policy settings. This is particularly concerning in the context of the implementation of the NDIS across Western Australia as high quality evidenced based research should drive the NDIS reform process.

As a starting point to address this issue, in August 2015 the DSC, NDS WA and the NDS Centre for Applied Disability Research (CADR) partnered to deliver a disability research seminar focused on developing disability services sector evidence based action research to support informed policy decision making. The seminar also explored the translation of research to service design and practice and policy. The target audience included:

- Front line practice leaders;
- People with disability, families and carers;
- Policy and program managers from Government, providers, and others; and
- Researchers and students.

The research to action seminar provided an opportunity for people with disability, families and carers, disability service organisations and researchers to work together in partnership to identify research priorities and facilitate better coordination of research.

The disability research seminar:

- Facilitated opportunities for an active partnership with disability service organisations, people with disability, families and carers and researchers;
- Informed practitioners in an engaging, succinct way about current research findings to underpin evidence based good practice in a wide range of areas;
- Provided practical examples as to how disability services organisations can distil and implement research evidence into practice;
- Exchanged and challenged research findings in the context of ‘realistic’ practice settings;
- Outlined the type of research that will be necessary in the new NDIS environment and its greater emphasis on evidence of ‘what works’;
- Helped identify evidence gaps for people with disability their families and carers in exercising genuine choice;
- Built greater research-mindedness and capacity in the disability services sector;
- Identified opportunities to coordinate the research effort in Western Australia and ensure priorities for research are appropriately progressed; and
- Explored the potential to establish a local NDS CADR footprint through the establishment of a Western Australian Disability Research Network.

The disability research symposium concluded that it is critical that action be taken to establish an appropriate mechanism that better coordinates and targets investment in disability research in Western Australia.

NDS WA recommends the State Government support the establishment of a Western Australia Disability Research Network and formalise a link with the NDS Centre for Applied Disability Research. This would include the establishment of a steering committee and the development of a prospectus and business plan.

State Government Not For Profit Reform and Commitment to the Delivering Community Services in Partnership Policy

NDS WA has been strongly supportive of the State Government’s development of the DCSP Policy and associated procurement reforms. The significant sustainability funding of \$604 million and the establishment of a Partnership Forum that engages and seeks active participation with shaping policy and community services for people with disability are commended.

The NDS WA Pre-Budget Submission 2016-17 seeks an ongoing commitment by the State Government to the DCSP Policy. The Government’s proposed ongoing commitment to indexation under this Policy is welcome, including a transparent and consistent level of indexation.

In addition, in a full NDIS, there should be a commitment to long-term contracting for disability services and retention of the existing positive funding and service agreement arrangements such as pricing that reflects the real costs of service delivery and advance

payments to organisations. Recent discussions on this issue have focussed on whether there should be a move to arrears payments or keep payments in advance or develop a hybrid model. NDS WA requests to work with government to create a flexible and timely payment system that minimises administrative costs (both government and NGO) and is responsive to the differing needs and models of service delivery and enhances sustainability.

Continued Commitment to Champion and Support the National Disability Strategy

This National Disability Strategy continues to be highly relevant to all areas of Government, perhaps even more so with the introduction of the NDIS which creates both new opportunities and responsibilities for other service areas for which Governments are responsible.

The National Disability Strategy is an initiative of the Council of Australian Governments (COAG) agreed by all levels of Government including the Government of Western Australia, is a national approach to improving outcomes and whole of life opportunities for people with disability in Australia. It is a high-level framework designed to guide and give coherence to actions across Governments and portfolios.

Through its funding of the disability services sector the Government of Western Australian has demonstrated a strong commitment to the Strategy and has shown leadership in developing a strategic vision to better meet the growing service needs of people with disability and to build sustainable, quality services. The State Government fulfils its responsibilities under the National Disability Strategy primarily through the Department of the Premier and Cabinet and the DSC Count Me In long-term plan. This framework has three areas of focus, 13 priorities and 80 pathways or strategies. All priorities align strongly with national initiatives currently driven through the implementation of the 10-year Strategy. These areas are critical for Government departments and agencies, local governments, private enterprise, community groups and disability services sector organisations to embed within their services, programs and activities.

The State Budget 2015-16 provided growth funding for all Western Australian residents with disability, whether they lived in a NDIS trial site or not, allocating an additional \$27.6 million (\$24.6 million from the State and \$3 million from the Commonwealth governments) for disability services, in addition to \$58 million allocated over two years for the Perth Hills NDIS trial site. It is commendable that funding for the disability services sector has increased since 2008-09 by 122 per cent, with, most of the funding provided by the Government of Western Australia¹⁰. The DSC budget for 2015-16 will be almost \$964 million including contributions from the Australian Government and other income sources with the Government of Western Australia providing the majority of funds at \$717 million. It is most pleasing that the State Budget 2015-16 made provision for an increase in funding for disability services of \$98 million or 11.3 per cent in 2015-16 to meet growing community need for disability services Western Australia and accommodate increasing demand for support and services¹¹.

However, this level of investment must continue. The State Government has a responsibility to continue to improve the social and economic inclusion of people with disability in

our community by, for example, ensuring community facilities are accessible, providing affordable housing, improving participation in training and employment and access to justice. It is critical that the State Government continues to invest in improving the lives of people with disability in Western Australia across all its portfolio areas in addition to its investment in the NDIS to fulfil its obligations to implement the National Disability Strategy. The NDIS only provides funding supports for individuals.

Clear State and Australian Government Responsibility Needs to be Articulated

NDS WA is concerned that the National Disability Strategy lacks traction and designated responsibility.

NDS WA provided input to the Australian Government review of the strategy in April 2014 as part of the NDS National Submission. We highlighted that the Strategy has no accountable authorities that oversee progress with its implementation and monitor the effectiveness of its initiatives. There are no incentives to fast-track reform and there is no dedicated funding to support priority reform initiatives.

There is a need to regulate responsibilities under the Strategy so that its principles are reflected in legislation. This is particularly important as the NDIS takes shape and State Governments begin to move out of direct service delivery. We need to ensure that people with disability are appropriately reflected in new service delivery models.

In addition, further investment in initiatives that promote the Strategy across Government departments and agencies, and the private sector need to be considered. This might include developing leadership models where designated ‘champions’ promote the strategy in key Government departments. If such a model was adopted it would provide focus to the implementation of strategy initiatives and, importantly, provide a contact in each department to promote the National Disability Strategy.

NDS is of the view that the State Government needs to better monitor the implementation of the Strategy by developing and using performance indicators to track progress and the achievement of designated policy outcomes. The development of national and State minimum data sets and indicators is of paramount importance, and there is a critical need for investment in determining data frameworks that will assist in measuring outcomes and provide indices of disability well being and systemic improvements. This will be particularly important as the State disability system transitions to a NDIS over coming years. NDS WA also highlights to Government two critical disability services sector sustainability issues that should be addressed as priorities.

While NDS WA acknowledges the State Government has progressed with implementation of the National Disability Strategy across a number of policy areas, primarily through the DSC Count Me In program, there is considerable work that needs to be undertaken across a number of areas to ensure its effective implementation at a State level.

The DSC 2013 review of the program, the Count Me In Stocktake, highlighted key priority areas that need to be further progressed.¹²

While NDS WA believes that the DSC has undertaken a significant number of commendable initiatives between 2010 and 2012 that have made progress on all priorities and many pathways of the Count Me in Framework, the stocktake highlights three particular areas of work that need to be further progressed:

- Housing - embedding Universal Design through 'Liveable Homes' in public, private and community housing. Improving access for people with disability to affordable housing;
- Employment – increasing employment for people with disability in the public, private and local government sectors; and
- Health – improving access to health services through the Disability Health Network and Disability Liaison Officers.

Recommendations For Action

- 2.1 Investing in the Western Australian disability services sector to support the transition to a NDIS through the development of a Disability Services Industry Plan that supports the priorities articulated in this Pre-Budget Submission.
- 2.2 The consideration of the transfer of all government provided disability services to the NGO sector building on the past and current performance of the sector. transfer of all services to the NGO's building on past and current performance of the sector. This would form an action of the NDS WA proposed Disability Services Industry Plan and also assist in the delivery of appropriate services where block funding is required in a NDIS environment across Western Australia.
- 2.3 Further supporting the Western Australia services sector and the transition to a NDIS by establishing an NDIS Sector Innovation Fund that assists in building a strong disability services sector that provides increasing and diverse choice for people with disability in metropolitan, regional and remote locations across Western Australia. Specifically NDS WA specifically calls on the State Government to provide funding for a Shaping Services Project that explores options for:
 - Incentivising value for money services, promotes sector sustainability, innovation that actively rewards continuous improvement and added social value;

- Projects that build regional sector sustainability. These should be funded as a priority including options for service providers to explore sharing information technology and corporate services, the provision of regional online training on quality systems and effective safeguards, supervision and rostering; and
 - Developing funding models that support the provision of high priority integrated service responses in partnership with the not for profit sector. A priority focus should be on the co-design of services for people with complex and high level disability support needs.
- 2.4 Support the establishment of a Western Australian Disability Research Network in Western that links with the NDS Centre for Applied Disability Research.
- 2.5 Ensuring there is ongoing access to mainstream services for the almost 280,000 Western Australians with a disability who will not directly qualify for the NDIS and to building a stronger not for profit disability services system. This will require continued investment in priority initiatives to meet State Government obligations to promote the National Disability Strategy across its departments and agencies on commitments to the NDIS which are focused on providing individual support for people with disability.
- 2.6 Committing to the DCSP Policy and indexation. In addition, as part of the ongoing review of the DCSP Policy there should be commitment to long-term contracting for disability services and retention of the existing positive funding and service agreement arrangements such as pricing that reflects the real costs of service delivery and advance payments to organisations.



3.

Personal and Community Support

PRIORITY 3: **The Best No Fault Insurance Scheme**

Summary

NDS WA applauds the State Government decision to implement a No Fault Insurance Scheme (NFIS) announced in the State Budget 2015-16.

NDS WA advocacy and evidence based research around no fault insurance through our previous Pre-Budget Submissions and community engagement has contributed significantly to progressing the introduction of a NFIS. The personal leadership of Hon Colin Barnett MLA, Premier of Western Australia on this issue is also acknowledged and greatly appreciated.

It is now vital the State Government and the Insurance Commission of Western Australia (ICWA) establish an Advisory Group and work with NDS WA and stakeholders to design the most effective and efficient model possible to provide access to early intervention, rehabilitation and lifelong care and support for people who are catastrophically injured in motor vehicle accidents in Western Australia.

The Issue

The State Government announced in the State Budget 2015-16 its decision to implement a No Fault Insurance Scheme (NFIS).

The hybrid NFIS option to be adopted is based on Option 2+ articulated in the State Government Green Paper released on 15 October 2014. The paper outlined options for implementation of the NFIS and invited public comment on a possible scheme for Western Australia. The Green Paper outlined options to add no-fault catastrophic injury cover to Western Australia's Compulsory Third Party (CTP) insurance.¹³

Some key elements of the model are:

- Equal access to lifetime care and support regardless of fault;
- Where there is fault, people can choose to proceed through the legal system and settle for lump sum compensation;
- Claims for economic loss and pain and suffering will also remain claimable from existing CTP providing fault can be established;

- There will be separate No Fault Fund that will be essentially quarantined so Government cannot extract a dividend from the scheme back into general revenue;
- ICWA will run the NFIS; and
- The increase in CTP registration cost as from 1 July 2016 is:
 - \$99 for family cars and motorcycles over 75cc;
 - \$30 for farm fire fighting vehicles, mopeds and vintage cars;
 - \$25 tractors; and
 - No charge for caravans and trailers.

The introduction of the NFIS will ensure all people catastrophically injured in motor vehicle accidents will be eligible for ongoing care and support over their lifetime. It is long overdue and will make a tremendous difference to the lives of those people and their families. Ultimately, it should provide peace of mind and a much fairer model of lifetime care and support for everyone, regardless of whether anyone is to blame for an accident.

NDS WA welcomes the introduction of a NFIS and is extremely pleased that funds collected from the NFIS will be quarantined and that a dividend will not be extracted.

However, it is concerning that the NFIS will not be implemented until July 2016. NDS WA appreciates that there are still many issues that need to be worked through including legislating the scheme and guidelines and acknowledges the practicality of the July 2016 working start date. The Government has indicated that to introduce the scheme the Motor Vehicle (Third Party Insurance) Act 1943 and the Insurance Commission of Western Australia Act 1986 require amendments and that supplier panels will need to be put in place. There will also need to be changes to both Department of Transport and ICWA systems and processes to enable the scheme to commence as planned on 1 July 2016.

However, we do urge the State Government to consider some potential options as to how the NFIS can be transition or phase people into the NFIS immediately. Every year an average of 44 people are catastrophically injured on Western Australian roads in accidents for which no one can be sued. They and their families desperately need to be also covered by this scheme.

It is now vital the ICWA work with NDS WA, the DSC and stakeholders in the disability services sector to design the most effective and efficient model possible. This could be done through the establishment of an expert advisory group to help guide the development of the NFIS and ensure extensive engagement and consultation with disability services organisations and stakeholders. This partnership approach would be another example of how the State Government and the disability services sector are reflecting and putting into practice the principles and behaviours of the State Government DCSP Policy.

Work commissioned by NDS WA indicates that scheme design should be based around a set of core principles.

Fundamental to this reform and implementation of a NFIS in Western Australia, is that the State scheme must deliver as a minimum what the citizens of other jurisdictions with no fault schemes receive through their schemes.

A number of key principles described by Sir Owen Woodhouse in his inquiry into the need for a National Compensation and Rehabilitation Scheme for injury and sickness in Australia in 1974, are widely accepted as foundation principles for successful no fault accident compensation schemes and have directly informed the design of all no fault injury schemes developed in Australia and New Zealand in the decades since this landmark report.

Woodhouse Principles:

- (i) Community responsibility is a central issue. In the national interest, and as a matter of national obligation, the community must protect everybody;
- (ii) Comprehensive entitlement. Regardless of cause, all injured persons should be assisted by the community-financed scheme and on the same uniform basis;
- (iii) Complete rehabilitation. The scheme must be organised to urge forward the physical and vocational rehabilitation of all these citizens'
- (iv) Real compensation. There must be real compensation for the whole period of incapacity, and for permanent bodily impairment; and
- (v) Administrative efficiency. The collection of funds and their distribution as benefits must be handled speedily, consistently, economically, and without contention.

While the cost of supporting injured West Australians is a key consideration, Western Australia's NFIS must also ensure that the best opportunities for recovery and community participation are available to scheme participants.

The scheme also needs to reflect the community's contemporary thinking about Australians with disability by supporting the active social and economic engagement of all citizens in communities.

Embodying key imperatives around choice, recovery, rehabilitation, community participation and independence of scheme participants will ensure the new NFIS plays a key social role beyond a limited operation as a narrow funding body simply providing compensation.

The principles of Western Australia's NFIS should:

- Reflect the Woodhouse principles for a no fault injury scheme;
- Include additional principles that align with those of the NDIS and the key chapters of the UN Convention of the Rights of Persons with Disabilities;
- Align with the principles of the National Disability Insurance Scheme Act 2013; and
- Reflect the key public health role the scheme has in road safety, research and service development.

The existing ICWA CTP scheme will continue to apply to individuals who sustain non-catastrophic injuries. To ensure that the scheme's identity is reflective of the principles outlined above and has clear separation from the current ICWA CTP scheme, the NFIS it should be called Western Australian Lifetime Care and Support Scheme (WALCSS).

NDS WA brings to Government's attention the findings of this research work and that strong consideration is given to components of the work in the design of the proposed NFIS.

NDS WA highlights to Government that scheme design is particularly important, given that a NFIS in Western Australia will be introduced into a new disability services environment that is being developed through implementation of the NDIS.

NDS WA urges the ICWA to work with NDS WA and the DSC to develop the best scheme possible for Western Australian citizens.

In addition, the Government should commit in-principle to ultimately expanding the scheme to cover all causes of catastrophic injuries, including those related to medical treatment, criminal injury and general accidents in the community or at home.

Recommendations For Action

3. Commit to engage and work with NDS WA, DSC and other stakeholders in co-designing and developing the No Fault Insurance Injury Scheme announced in the State Budget 2015-16 and establish an Advisory Group to guide the implementation of the scheme from 1 July 2016.





4.

Rights Protection, Justice and Legislation

PRIORITY 4:

A Comprehensive Approach to Preventing Abuse, Neglect and Harm

Summary

The Western Australian disability services sector remains vigilant and focused on preventing abuse and neglect of people with disability. In NDS WA's assessment there has been ongoing progress in improving the quality of safeguarding arrangements used across the Western Australian disability services sector. This includes contractual arrangements, reporting and compliance requirements, training and sector development initiatives, and monitoring and quality assurance processes.

Significant work has also been undertaken by the disability services sector and NDS WA to ensure continuous service improvement and to effectively safeguard people with disability. Current projects and initiatives, practice strengths and improvement strategies used across the disability service sector involve activities aim to:

- Improve pre-employment screening practices;
- Strengthen complaints management, handling and resolution;
- Develop understanding of the experiences and prevalence of abuse, neglect and harm against people with disability in Western Australia; and
- Build the skills and capacity of sector staff to assess and respond to individual risk and vulnerability.

The disability services sector's demonstrated commitment to continuous service improvement and to supporting the natural authority of people with disability, their families and carers are noted as strengthening service quality and safety.

Priority areas for development that require further consideration include:

- Strengthening the relationship between the disability services sector and disability advocates;
- A need to develop induction and training and consistent understanding and practice around both complaints and serious incident reporting, management and resolution;
- Mandatory reporting processes; and
- Making better use of complaints and serious incident data to identify specific trends and areas for targeted sector development.

The Issue

People with disability are at increased risk of being or becoming the victim of abuse, neglect and harm compared to peers without disability.¹⁴ A range of factors lead to people with disability being disproportionately vulnerable to abuse neglect and harm, these include:

- The effect of a person's disability on their expressive and receptive communication, cognitive capacity, and physical ability;
- Ongoing dependence on family, friends and sometimes paid supports for care and support;
- A lack of appropriate resources, this can include built environments not meeting individual needs, restricted income and financial or material assets, limited individualised funding, and a lack of available or appropriately trained and experienced staff; and
- Poor awareness of rights, this includes consumer rights, legal rights and basic human rights that are inherent to citizens.

Local, national and international research tells us that abuse, neglect and harm against people with disability occurs in various settings; in the community, within families, in hospital and education settings, and within disability service settings (residential and non-residential)¹⁵. However, the recently published report titled 'Behind Closed Doors' notes that abuse, neglect and harm is more likely to occur in segregated, isolated settings and in situations where individuals are largely dependent on paid supports.¹⁶

The Western Australian disability sector acknowledges the vulnerability of people with disability and remains focused on, and vigilant towards preventing abuse, neglect and harm of people with disability occurring. Significant work has been, and continues to be, undertaken in the disability services sector to strengthen safeguarding arrangements and to ensure quality service provision and continuous service improvement. This includes a range of projects and initiatives are currently underway to further develop or improve:

- Pre-employment screening practices;
- Complaints management, handling and resolution;
- Understanding of the experiences and prevalence of abuse, neglect and harm against people with disability in Western Australia; and
- The skills and capacity of sector staff to assess and respond to individual risk and vulnerability.

It is generally accepted that people with disability experience increased abuse, neglect and harm. Figure 1 provides 2010 ABS data which shows that compared with people without disability, people with restrictions in core activities (that is, people with disability who require supports) were 1.6 times more likely to have been victims of physical or threatened violence and 1.7 times more likely to have been victims of actual or attempted break ins in the previous 12 months. Among people with restrictions in core activities, 16.9 per cent had been victims of physical or threatened violence, compared to 10.3 per cent of people

without disability. Among people with core activity restrictions, 13.7 per cent had been victims of actual or attempted break in, compared with 8.0 per cent among people without disability.

Figure 1: Crime Victimisation in the Past 12 Months, by Disability Status, 2010¹⁷

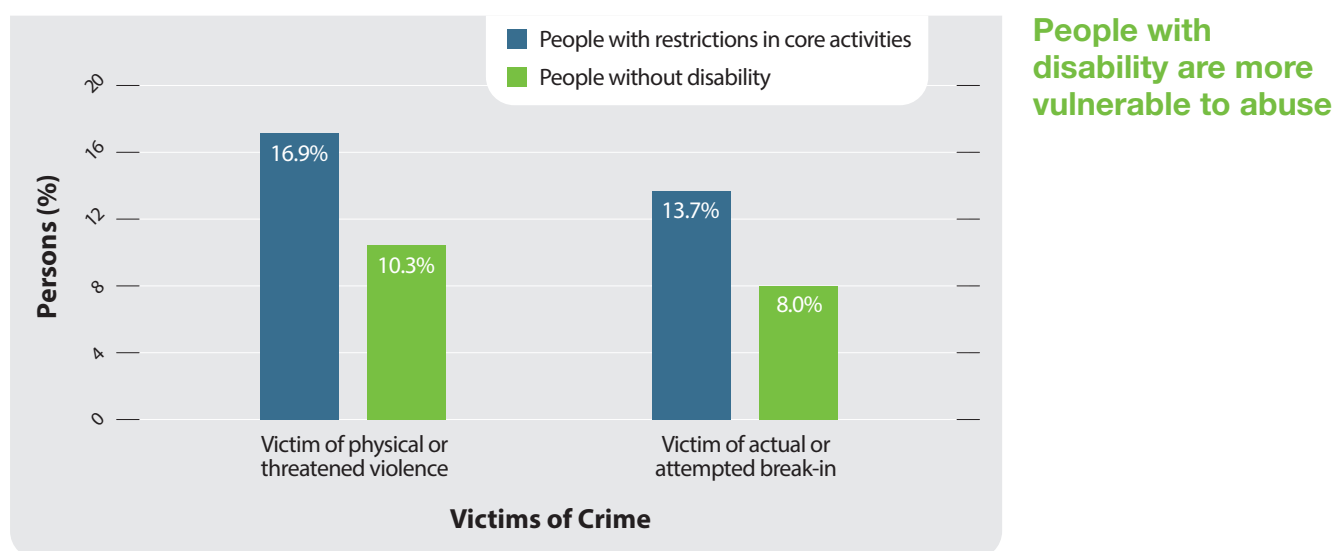


Figure 2: Proportion of victims and non-victims of personal and household crime by: disability type¹⁸

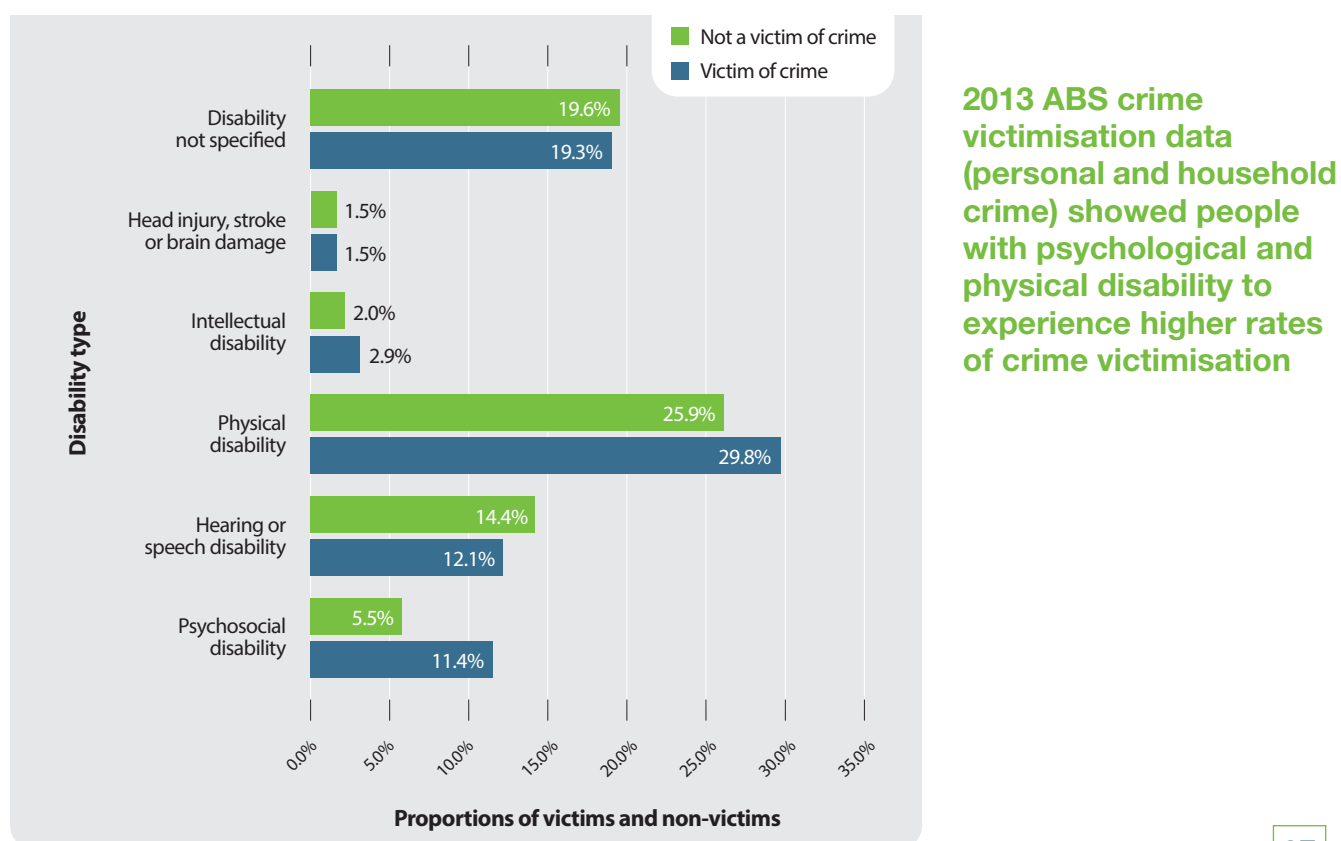
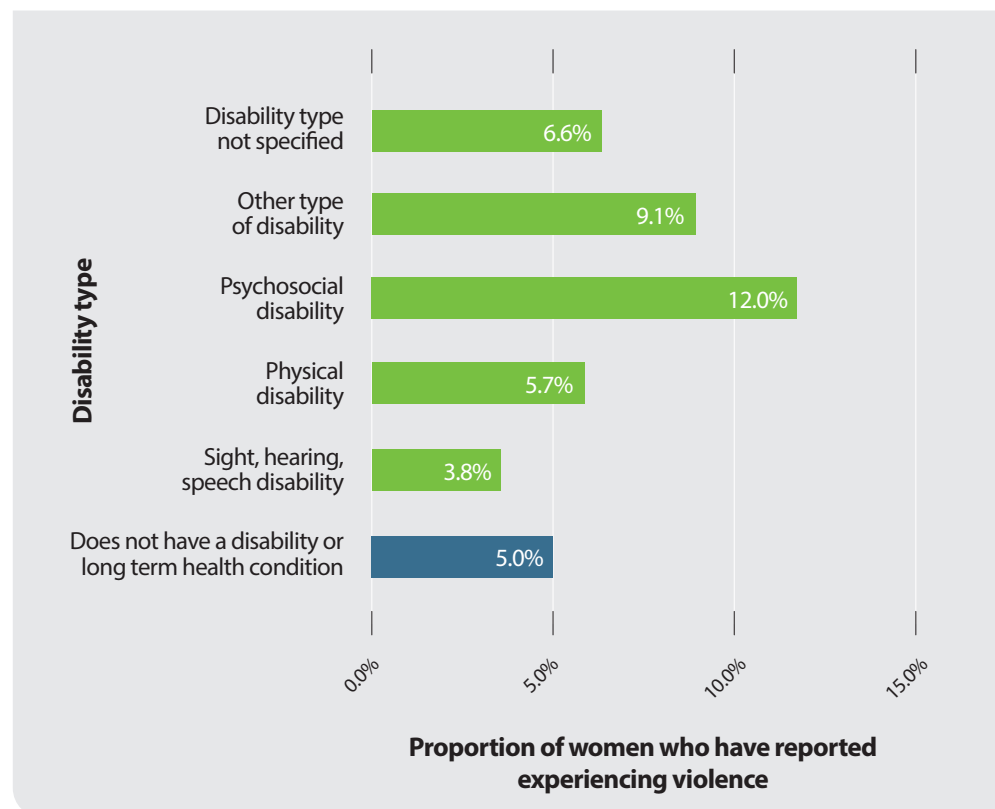


Figure 3. Women who have experienced violence during the last 12 months by disability status ¹⁹



The Western Australian Context

Ensuring the safety of people with disability is paramount in the delivery of quality disability services. Disability service organisations, as part of their mission, have a leading role in the prevention of abuse, neglect and harm of people with disability. The safety of services is dependent upon all people within an organisation demonstrating a commitment to the principles of quality management and ensuring a supportive culture of complaints and continuous service improvement.

In Western Australia there are a range of quality and safeguarding arrangements in place to promote quality service delivery. This includes contractual arrangements, reporting and compliance requirements, training and sector development initiatives, and monitoring and quality assurance processes. The DCSP Policy provides a foundation for sector collaboration and ensuring services deliver positive outcomes for people with disability.

Current quality and safeguarding actions in Western Australia

Quality assurance

Through the Western Australia Quality System the DSC monitors the quality of supports provided by close to 130 service organisations, and their adherence to the National Standards for Disability Services. This quality management system includes a mix of:

- Organisational self-assessment;
- Reviews of organisational policies and procedures;
- Regular independent quality evaluations and independent reviews involving people with disability, families and carers; and
- Reporting on complaints management and resolution.

Serious incident reporting

Service providers are required to report to the DSC any cases of ‘significant harm, assault and neglect’ as described in the Western Australian Disability Services Act 1993 (DSA 1993) Section 25 [4]. Notifiable incidents include suspected sexual, physical, emotional, financial abuse and neglect. The Commission investigates all reports to ensure appropriate safeguards are in place and liaises with police where appropriate and required.

Reporting on convictions

Any specific personnel have been convicted of a criminal offence that is punishable by imprisonment or detention, must be reported to the Commission.

Up-to-date Police Clearances

Organisations are required to provide Police Clearances for all employees involved in the provision of services.

Working with Children Checks

All staff working directly with children, particularly those working under limited supervision, are required to have Working with Children Checks.

Ongoing sector support and uptake of the ‘Code of Practice for the Elimination of Restrictive Practice’

The code provides the basis for the disability sector to develop operational policy and guidelines for eliminating the use of restrictive practices and applies to all services provided and funded by the Commission for children and adults with disability.

NDS is also engaged at the state and national level in the design and implementation of a broad range of initiatives aimed at supporting the ongoing development of the disability service sector in relation to improving the quality services, supporting person-centred, reflective practice, individual safeguarding and identifying and responding to complaints and serious incidents of any form. NDS has also been active in leading sector responses to issues of abuse, neglect and harm of people with disability. Initiatives with a focus on safeguards include:

Zero Tolerance

A NDS national initiative aims to provide an evidence-based, nationally consistent and contemporary approach to preventing and responding to abuse.

Safer Services Project.

A joint research project that is being undertaken with NDS WA and Curtin University to develop strategies that aim to build the capacity of disability service organisations to safeguard people with disability who are increased risk of abuse, neglect and harm.

Quality Service Improvement Grants

The NDS WA grants program has since 2011 provided Western Australian disability sector organisations with opportunities to develop and implement projects that proactively improve service quality and positive outcomes for people with disability, their families and carers. The program has also supported the development of whole-of-sector quality service improvement projects, tools and resources, for example:

- The 'Preparing to Plan: A guide to thinking about what you need to have the life you want' resource;
- The 'Supported Decision Making' tool;
- A 'Good planning practice and individual review resource' for disability service organisations; and
- An 'Applied Human Rights' training package for support workers.

NDS is also starting work on the development of safeguarding training and resources and complaints training and resources. Work is being developed to address knowledge gaps in the disability sector workforce with regards to individual safeguarding and to build frontline worker and management complaints management and handling practices.

Critical areas of future priority

Strengthening the relationship between the disability services sector and disability advocates. There is at times a tension between disability sector organisations and disability advocates and advocacy organisations, which in many cases leads to organisations being reluctant to engage with advocates. It is important all parties are working towards the common goal of supporting people with disability to access high quality services that meet their needs and expressed interests.

Developing consistency of practice and knowledge across the sector is critical, particularly with regards to:

- Complaints and serious incident reporting, management and resolution; and
- Ensuring people with disability are provided with appropriate support to navigate the complaints system(s), and/or access trauma support or other required services in instances where they have experienced (directly or vicariously) abuse, neglect or harm.

Introducing mandatory reporting processes across the disability service sector.

By introducing mandatory reporting all disability service organisations and professional groups supporting people with disability would be legally obliged to report any suspicion of abuse, neglect and harm against a person with disability. Such a move would send a clear message that people with disability have a right to be safe and that the community and disability sector will not tolerate or accommodate abuse, neglect or harm perpetrated against people with disability.

Accessing, analysing and making better use of existing data. This includes data collected through the DSC and HaDSCO's complaints processes and also serious incident reporting made to the Commission to identify specific trends and areas for future sector development.

Increasing collaboration between WA Police, ChildFirst and disability service organisations. There is a need to support and encourage disability service organisations that demonstrate excellence in person-centred practice, individualised service design and delivery, complaints management and resolution, serious incident reporting and management, and individual risk identification and mitigation to share and showcase their practices with other organisations.

Access to justice and giving of evidence by people with disability in Western Australia.

Protection under the law against criminal assault or abuse is something we all take for granted, however, the law does not offer its protection equally to all people. People with disability face many barriers in their participating in the justice process and provide reliable and accurate testimony. This occurs as a consequence of disability, particularly limitations in receptive and expressive communication, social factors and issues with the interaction with Police and interviewers.

Some people with disability may require specialised support to give testimony. Since 2004, the Evidence Act 1906 (Sections 106A-106T) has contained comprehensive provisions regarding the taking and admission of evidence from children, provisions designed to address the difficulties of presenting evidence from children in court. In 2008 these were expanded to include special provisions for evidence from persons with mental impairment and a broader category of 'special witness' that includes a person limited in giving evidence by reason of physical disability or mental impairment. These provisions include the visual recording of interviews and the admissibility of those recordings as evidence, giving evidence by video-link or behind a screen, the ability to have a support person in court, and the ability to take unsworn evidence from a 'mentally impaired witness'.

Discussions with the relevant Government Agencies and sector organisations have highlighted that these provisions are rarely being utilised. As a result evidence provided by people with disability is assessed by front line Police Officers, without apparent regard for the special provisions that exist to facilitate the taking and presentation of that evidence.

To support people with disability in giving evidence there is a need for equivalent information, infrastructure and procedural protocols to be established as exists in the case of child witnesses. A key part of that infrastructure for child witnesses is the ChildFIRST

Assessment and Interview Team (CAIT), a team serviced by staff from the Department for Child Protection and Family Support and Western Australia Police who have undergone specialist training in forensic interviewing of children. The team assesses all new referrals of child sexual assault or abuse within Western Australia, including physical assault offences against children perpetrated by a parent or carer. While primarily focused on responding to child abuse referrals, the CAIT do on occasion also work with referrals involving other vulnerable groups including people with disability. CAIT staff have received specialist training in interviewing people with disability, including intellectual and cognitive disability and severe communication impairments.

NDS recommends using the existing skills and expertise of the CAIT for specialist forensic interviewing of adults with disability rather than creating new and separate infrastructures.

However, in order for this to occur in a consistent, systematic way, there is a need for:

- The referral frontline (the first point of contact when assault or abuse is reported) to receive appropriate training and education;
- A dedicated specialist point of contact within Police to be established, that is a team responsible for receiving and addressing complaints of assault or abuse of people with disability; and
- Dedicated information to be provided to disability service providers about the referral processes for complaints about assaults against people with disability.

Comprehensive Disability Sector Induction Training

NDS WA is particularly supportive of the initiative to develop an across sector education and prevention program to deliver greater awareness of human rights principles, quality service provision, service standards, responsibilities and compliance, enhanced complaints management and improved practices around individual safeguarding.

NDS WA is well placed to develop and deliver a comprehensive disability sector induction/orientation education and prevention package for the disability sector workforce including administrative staff, support workers, team leaders, CEOs and Boards. This will be a critical support for the roll out of the NDIS across Western Australia.

Recommendations For Action

- 4.1 Ensure a comprehensive approach to preventing abuse and neglect by investing in the protection of people with disability through funding of further development of quality services and safeguards for people with disability including:
 - 4.1.1 Developing consistent Pre-Employment screening practices across the disability sector;
 - 4.1.2 Investing and building the sectors capacity to manage and respond to complaints by people with disability and their families and serious incidents;
 - 4.1.3 Developing mandatory reporting processes; and
 - 4.1.4 Developing sector workforce induction training. This will require ongoing funding for NDS WA to develop and deliver a comprehensive disability sector induction/orientation education and prevention package for the disability sector workforce including administrative staff, support workers, team leaders, CEOs and Boards. This will be a critical support for the roll out of the NDIS across Western Australia.
- 4.2 Developing an evidence based research model to inform and continually improve the above comprehensive approach.
- 4.3 Renaming and resourcing the ChildFIRST Team to take on an expanded role for interviewing vulnerable witnesses, including people with disability.
- 4.4 Create the infrastructure and protocols required within Western Australia Police to ensure appropriate referral of complaints by, or on behalf of, people with disability. This includes establishing a designated specialist referral point for these complaints and providing tailored education to front line Police officers.
- 4.5 Development of public information and disseminating referral guidelines relating to the laying of complaints of assault or abuse against people with disability in cases where their disability is likely to impair their ability as a witness.
- 4.6 Work with NDS WA on better understanding, promoting and implementing of a process to enact Section 53 of the Disability Services Act, specifically as it relates to the powers of the DG in prosecuting \$4,000 fine or 12 months jail term for individuals who abuse or neglect a person with a disability.



5.

Learning and Skills

PRIORITY 5: Investment in Education and Training

Summary

Previous NDS WA Pre-Budget Submissions highlighted that there is strong evidence that school-aged children with disability experience some difficulties at school, most commonly, fitting in socially, communicating and difficulty with learning.

Learning skills is one of the six policy areas highlighted in the National Disability Strategy, in acknowledgement that:

‘A significant gap exists between students with disability and those without, notably in the attainment of Year 12 or equivalent, vocational education and training qualifications, and participation in university studies. Targeted support is needed to assist people who are disadvantaged in education and in the workforce, but mainstream education programs need to be designed for people of all abilities’.

Significant barriers exist for children and young people with disability to fully participate in schooling. This is reflected in the lower attainment levels for this cohort when compared to children and young people without disability.

Increasing the rate of employment of people with disability is a key priority. NDS WA has consistently highlighted to Government that Western Australia’s vocational educational and training (VET) participation rate for people with disability remains the lowest in the country with little effect. As the State transitions to a NDIS it is even more critical there is significant investment in developing training and employment pathways for people with disability.

The Issue

Education

The National Disability Strategy and the national education agenda articulate that the role of education is vital to Australia having a productive, sustainable and inclusive future.

The United Nations Convention on the Rights of Persons with Disabilities also addresses the rights of people with disability to access education. Article 24 notes signatories should ensure that: *Persons with disabilities should have access to an inclusive, quality and free primary education and secondary education on an equal basis with others in the communities in which they live.*

Research has shown that countries with higher average education and skill levels have higher economic output. By acquiring new skills and knowledge throughout their working lives, individuals have the capacity to contribute at their full potential to the country's prosperity.

At present there remains a significant gap between students with disability and those without, notably in the attainment of year 12 (or equivalent), vocational education and training (VET) qualifications, and participation in university studies. Targeted support is needed to assist people who are disadvantaged in education and in the workforce, but mainstream education programs need to be designed for people of all abilities.

The number of people completing Year 12 provides a measure of whether people are continuing to study to the end of schooling opportunities. While school retention rates for people without disability aged 15-64 years have improved from 49 per cent in 2003 to 55 per cent in 2009, the same degree of improvement in school retention rates has not occurred for people with profound or severe core-activity limitations. It has increased marginally from 24 per cent in 2003 to 25 per cent in 2009, roughly one quarter the rate of improvement experienced by those without disability.²⁰

People with a profound limitation are also considerably less likely to hold a non-school qualification (40 per cent) compared to those without disability (57 per cent). Of those who did hold non-school qualifications, their disability impacted on the likelihood of undertaking a higher level qualification. While people with disability were more likely to have obtained a certificate level qualification than people without disability, they were considerably less likely to have completed a higher level qualification.²¹

A significant issue for Western Australian secondary students with disability is their restricted eligibility to complete the Western Australia Certificate of Education (Certificate 2) and they typically are not able to attain this certificate. When they complete their secondary schooling they receive a Statement of Results. NDS WA believes streaming disability students into an alternative certificate stream is discriminatory and inhibits their participation in further education.

NDS WA is of the view that this qualification pathway practice needs to be reviewed. All children and young people are entitled to a quality education outcome irrespective of whether they have a disability or not.

Targeted Intervention Education Strategy

In line with the Western Australian Government's focus on a person-centred, lifespan approach, it is imperative that children and young people with disability are provided with the right facilities, services and supports to enable them to effectively transition from home to school to adult life.

NDS WA requests that the State Government develop a targeted strategy supported by adequate funding for the following range of early intervention programs as an avenue to providing effective transition from home to school and inclusion in local primary and secondary school settings for children and young people with disability.

The targeted intervention strategy for children with disability would focus on:

1. An Implementation Plan for the National Disability Strategy (Learning and Skills). The Strategy has significant aspirational educational targets for children and young people with disability. However, these are not supported by a comprehensive implementation plan at a State level including acknowledgment of the additional funding required to action the plan. The State Government and the Department of Education should develop an implementation plan for the National Disability Strategy with respect to its education targets and outcomes for children and young people with disability. The focus would be to ensure people with disability achieve their full potential through their participation in an inclusive high quality education system that is responsive to their needs. People with disability should have the opportunity to continue learning throughout their lives. The implementation focus should be around the following areas:
 - Reducing barriers and simplifying access for people with disability to a high quality, inclusive education system including early learning, child care, school and further education;
 - At the review points of the National Education Agreement, the National Agreement for Skills and Workforce Development, Smarter Schools for Improving Teacher Quality National Partnership and other learning and skills-related National Partnerships, parties agree to consider including strategies, consistent with the National Disability Strategy, and performance indicators to ensure they address the needs of students with disability;
 - Developing innovative learning strategies and supports for students with disability which are accessible, reliable and responsive to strengthen their aspirations and enable them to reach their full potential;
 - Investigating options for reporting on educational outcomes of students with disability;
 - Identifying and establishing best practice for transition planning and support through all stages of learning and from education to employment;
 - Responding to the recommendations of the review of the Disability Standards for Education; and
 - Ensuring the Early Years Learning Framework, Australian Curriculum and national assessment processes incorporate the needs of students with disability within an inclusive education framework.
2. Compulsory disability awareness training for teachers, particularly new graduates, pre-service and practising teachers. It is critical that all teachers are provided with high quality training to assist children with disability through their education journey. This type of training should become a compulsory core competency. Classroom teachers should have access to information and support from professionals in disability education support as well as the experience of other teachers. This training is particularly important for new graduates, pre-service and practicing teachers that typically have minimal teaching experience and, or, contact with children and young people with disability.

3. Ensuring the provision of education materials in alternative formats. Despite recognition among Governments of the importance of literacy and numeracy, too many students with disability are falling behind in these areas. 'At-risk' groups require additional support and these groups must include students with disability. Classroom teachers should be aware of an individual student's needs for alternative formats and plan ahead so that course texts and other materials are available when students without disability receive the standard versions. Ongoing funding support is required to support and resource teachers to provide teaching adjustments for students with disability. In addition, NDS WA has identified through discussions with the Western Australian Department of Education that supports for students with intellectual disability need significant additional resourcing.
4. Ensuring that teaching and learning equipment programs are properly resourced and invest further in the provision of therapy services. Therapy encompasses a wide range of interventions which aim to improve the well-being of an individual in society. The provision of aids and equipment is often used as a component of, or as an enhancement to, therapeutic intervention. Families commonly attribute their child's improved levels of functioning to therapy, and see therapy and equipment as crucial in supporting independence, facilitating participation and contributing to their child's overall well being. Historically, the value of therapy services has been underrated with respect to its contribution to assisting students with disability through their education journey and this has been reflected in the funding allocated to these types of services. In addition, NDS WA is of the view that aids and equipment provided to secondary students with disability while studying should be retained by students when they leave school to assist them in their transition to work. This is not the current practice.
5. Promoting inclusive early childhood and schooling practices and accessible classrooms and facilities. Inclusion is usually understood to involve programs in which children with and without disability participate jointly in educational curricula, activities and environments. Conditions necessary to promote social competence include providing accessible classrooms and facilities, and curriculum and program content that fosters interactions between children with and without disability. NDS WA acknowledges that the State Government has addressed some of these issues with the provision of significant funding in this area. However, additional specific strategies are needed to teach social skills, including training peers to interact with children with disability, training children with disability to interact with classmates, helping professionals to develop children's social skills, and using well-structured classroom environments and curricula to support inclusion.

Supporting Education Partnerships to Positively Influence and Develop Education Policy and Outcomes for People with Disability

The 2009 Economic Audit Report, Putting the Public First, Partnering with the Community and Business to Deliver Outcomes, concluded that the State Government should provide the opportunity for the community sector to partner in the delivery of all Western Australian human services, including education.²²

NDS WA is of the view that the Government should support a partnership arrangement between the DSC, Department of Education and not for profit disability organisations to influence and develop education policy and outcomes for people with disability.

2010 Review of Disability Standards for Education 2005

NDS WA has highlighted significant concerns which were outlined in the recently released 2010 Review of Disability Standards for Education 2005.²³ These included:

- Poor awareness of the standards across all stakeholders;
- Limited practical advice and training on implementing the standards for educators;
- Weak accountability and compliance processes. There is no requirement for compliance reporting for education providers and that education institutions will not have to produce regular Disability Action Plans which demonstrate progress towards making every school accessible for children with disability;
- Inadequate resources to meet the needs of students with disability; and
- Lack of clarity on terms such as ‘consultation’ and ‘reasonable adjustment’ and no sector-specific guidelines. There is also confusion over the coverage of Registered Training Organisations and child care providers that offer preschool programs.

The Australian Government’s commitments to reform are supported by NDS but limited to:

- The development of appropriate guidance materials on implementing the requirements of the standards;
- The development of individual education plans for students with disability in schools;
- The development of good practice guidelines;
- A review of all national policy and regulatory education frameworks, such as VET, National Professional Standards for Teachers and Principals and the National Quality Framework for Early Childhood Education and Care; and
- the promotion of inclusive practices such as on the My School website and appropriate training of support staff to meet core competencies.

NDS WA was pleased that the Review of Funding for Schooling report gave significant attention to children with disability as a disadvantaged group and recommended that funding be more equitable. The Australian Government has indicated that over the next four years it will implement a ‘fair and needs based’ funding model, but the details of this model are not yet available. The following matters should be maintained or addressed:

- The establishment of a schooling resource standard for all students, which includes a loading for children with disability. Without a significant funding increase, children with disability will continue to fail to reach their potential.
- The progressive roll out of a nationally consistent Collection of Data on School Students program across education systems. This welcome development will improve our understanding of disability among school students and is a critical component

of the creation of a disability loading. Finalising this work and implementing the disability loading should be priorities.

- A complementary stream of funding, not attached to the individual student, should be established to help schools become ready and willing to accept children with disability, through the development of staff, accessible infrastructure and raising awareness of disability in the broader school community. This would help reduce the discrimination, exclusion and bullying which students with disability commonly experience.
- It is critical that all teachers and aides working with students with disability, in special schools or mainstream settings, have appropriate qualifications or training. To overcome a culture of low expectations of students with disability, professional development should be widely available. The National Plan for School Improvement does indicate that all teachers should have access to ongoing training, but unfortunately, it does not highlight the importance of skills to educate children with disability. This is an oversight.
- Training for all teachers at undergraduate and postgraduate level should impart skills in disability and inclusion. Teachers should also be able to draw on specialist teaching support and advice; the development of multi-disciplinary teams that bring together disability and education expertise should be considered.
- Adherence to the Disability Standards for Education should form part of the mandatory registration process for a school and thus be a condition for the receipt of Government funding. This requirement could be built into the National Education Agreement and would address the findings of the 2012 review of the Disability Standards for Education which identified a poor level of awareness of and compliance with the standards across schools.

NDS WA is of the view that the Australian Government's commitments from the review are limited and is disappointed that the Government will not require compliance reporting for education providers. Until there is improved accountability, many students and their families believe that they will struggle to gain reasonable support at school.

It is critical that the State Government proactively supports the recommendations from the 2010 Review of Disability Standards for Education 2005 to ensure that students with disability are able to access and participate in education and training on the same basis as those without disability. All schools should be required to demonstrate that their practices align with the Disability Standards for Education 2005 as an accountability mechanism. Historically, education has been a key responsibility of State jurisdictions and therefore it is incumbent on the State Government to ensure that the standards are implemented across all schools in Western Australia and that this implementation is strictly monitored.

Establish a Complaints Body for Parents with Children and Young People with Disability Within the Education System

Parents with children and young people with disability in school have indicated that they do not have access to an appropriate review mechanism which addresses the concerns they may wish to raise about the quality of schooling and/or, the care their children receive while they are being educated.

NDS WA supports the establishment of a body and processes that enable parents with children and young people with disability within the education system to voice such concerns. Importantly, this Complaints Review Body would report on systemic gaps in the education system for people with disability and would be used to facilitate improvements in service delivery.

Training

Skills Australia estimates that the nation will require an additional 2.4 million people in the workforce with qualifications at Certificate III level and higher by 2015, increasing to 5.2 million by 2025, to meet projected industry demand and the replacement of retiring workers.²⁴

Furthermore they indicate that the Vocational Education and Training (VET) sector has a major role in responding to this challenge and reaching people who have only been marginally or intermittently connected to the world of work and formal education.

The National VET Equity Advisory Council reported that if existing vocational education and training pathway gaps were eliminated, the potential increases to key national economic indicators are significant. Access Economics forecasts that for the Aboriginal and people with disability populations in 2020:

- Real Gross Domestic Product would increase by \$12.2 billion;
- Real consumption would increase by \$5.9 billion; and
- Full time equivalent jobs would increase by 118,000.²⁵

It is therefore critically important for Governments across Australia to implement training and employment strategies that specifically target people with disability with a view to increasing their employment opportunities. This is particularly important given the prevalence of disability is expected to increase significantly as the population ages. One in four people will have a disability by 2025, a significant component of Western Australia's population and potential workforce.

The National Disability Strategy highlights that:

“It has been estimated that the Australian community is contributing to an annual recurrent cost of \$18.8 billion dollars per annum by not addressing the vocational training needs of people with a disability. Failure to address this issue nationally is keeping productive people out of the workforce. Research shows that people with vocational education and training qualifications are more likely to be employed than those who have no post-school qualifications. People with disability, however, are not reflected in participation rates

compared to their presence in the community, Australian National Training Authority (ANTA, 2000)".

Increasing the rate of employment of people with disability is a key priority for this submission. In recognition of this, funding to support effective training and employment strategies is a major theme of the NDS WA Pre-Budget Submission 2016-17.

Funding for a Vocational Education and Training Disability Participation Program

NDS WA highlighted to the State Government in our PBS 2014-15 the need for significant investment in developing training and employment pathways for people with disability in Western Australia.

The Australian vocational education and training participation rate of people with disability is the lowest of all disadvantage groups.

Of significant concern is that the National Centre for Vocational Education Research 2011 data indicates that Western Australia has the lowest proportion of people with disability undertaking vocational education and training, 4.8 per cent, compared to the national average of 6.8 per cent and significantly lower than the major States of NSW (7.2 per cent) and Victoria (7.6 per cent).²⁶

*Western Australia remains as the jurisdiction with the lowest proportion of people with disability undertaking VET declining from 4.9 per cent in 2012 to 4.8 per cent in 2013.*²⁷

Figure 4: VET Students by Disability Status by State or Territory, 2013

State/Territory	With a disability		Without a disability		Not known		Total	
	Number	%	Number	%	Number	%	Number	%
New South Wales	40,495	7.2	468,478	83.1	55,015	9.8	563,988	100.0
Victoria	48,217	7.6	578,645	91.1	8,312	1.3	635,174	100.0
Queensland	12,807	5.0	145,290	57.1	96,400	37.9	254,497	100.0
South Australia	10,497	6.3	155,213	93.7	-	-	165,710	100.0
Western Australia	7,905	4.8	134,593	82.2	21,257	13.0	163,755	100.0
Tasmania	3,906	9.1	38,056	88.6	1,005	2.3	42,967	100.0
Northern Territory	1,280	5.6	20,969	91.4	698	3.0	22,947	100.0
Australian Capital Territory	2,071	7.3	26,180	91.9	222	0.8	28,473	100.0
Australia	127,178	6.8	1,567,424	83.5	182,909	9.7	1,877,511	100.0

Source: 2013 National VET Provider Collection

Note: For notes relevant to this table refer to 'VET Notes on tables'.

A dash (-) represents a true zero figure, with no data reported in this category.

NDS WA has consistently highlighted to the State Government in previous Pre-Budget Submissions that WA's VET participation rate for people with disability remains the lowest in Australia with little effect. As the State transitions to a NDIS it is even more critical there is significant investment in developing training and employment pathways for people with disability. The State Budget 2015-16 did not contain any provision for training of people with disability or address this low level of participation.

As a starting point, NDS WA proposes funding for two targeted initiatives that will lift the level of vocational education and training participation for people with disability.

- A Research Scoping Study to explore reasons for low VET participation by people with disability and to develop target strategies. The research would examine the structural and personal barriers affecting both training and labour market participation. Additionally, it would identify the barriers to completion, such as the lack of extensive student support services and flexible approaches to training delivery; and the potential to develop an integrated partnerships approach, with advice linked to other services beyond the remit of the VET system. A particular focus would be to identify work opportunities and provide career guidance, with the ambitions of the individual supported and the development of 'life skills' encouraged, so that the individual can manage educational and occupational pathways; and
- A pilot Disability Participation Action Research Project that develops and trials strategies aimed at building a VET centre of excellence for people with disability. Central TAFE has indicated its support for such a project pending adequate resourcing.

Recommendations For Action

Education

The State Government should develop a targeted education strategy supported by adequate funding for a range of early intervention programs including:

- 5.1 Developing a long term implementation plan for the aspirational education targets articulated in the National Disability Strategy.
- 5.2 Promoting early childhood and schooling practices, including accessible classrooms and facilities for children and young people with disability, that lead to improved educational outcomes and experiences for these students.
- 5.3 Providing disability awareness training for teachers, particularly new graduates, pre-service and practising teachers.
- 5.4 Ensuring the provision of educational materials in alternative formats and that every student with a disability has access to these.
- 5.5 Ensuring that teaching and learning programs are properly resourced and invest further in the provision of therapy services.
- 5.6 Support and resource a partnership arrangement between the DSC, Department of Education and not for profit disability organisations to influence and develop education policy and outcomes for people with disability.
- 5.7 Provide funding for a project that audits the extent to which the Disability Standards for Education 2005 have been implemented in Western Australia and develop an action plan to address implementation gaps.
- 5.8 Ensure that all schools report on their accountability to the Disability Standards for Education 2005.
- 5.9 Establish a Complaints Review Body for parents with children and young people with disability within the education system.

Training

The State Government should support and resource two targeted initiatives that will lift the level of Vocational Education and Training (VET) participation for people with disability in Western Australia including:

- 5.10 A Research Scoping Study to explore reasons for low VET participation by people with disability and to develop target strategies. The research would examine the structural and personal barriers affecting both training and labour market participation. Additionally, it would identify the barriers to completion, such as the lack of extensive student support services and flexible approaches to training delivery; and the potential to develop an integrated partnerships approach, with advice linked to other services beyond the remit of the VET system. A particular focus would be to identify work opportunities and provide career guidance, with the ambitions of the individual supported and the development of 'life skills' encouraged, so that the individual can manage educational and occupational pathways; and
- 5.11 A pilot Disability Participation Action Research Project that develops and trials strategies aimed at building a VET centre of excellence for people with disability. Central TAFE has indicated its support for such a project pending adequate resourcing.



6.

Economic Security

PRIORITY 6: **Investment in Employment Solutions**

Summary

Increasing the rate of employment of people with disability remains a key priority for the NDS WA Pre-Budget Submission 2016-17.

Western Australians and Australians with disability continue to be under-represented in the labour force having markedly lower labour force participation rates and higher unemployment rates than people without disability. They face many significant barriers to employment and have access to ineffective pathways to transition to meaningful employment.

Participation in the labour market is a major determinant of living standards for people with disability, it provides economic security and capacity for them to live independently and enhances their economic and social participation in our community.

NDS WA advocates that the State Government needs to invest in a range of dedicated strategies to actively promote the employment of people with disability in the public and private sectors as a critical priority. In recent years the employment of people with disability in the Western Australian public sector has fallen from 10 per cent to 2.6 per cent of all employees. This is a wholly unsatisfactory state of affairs that demands urgent action.

The Issue

NDS WA has consistently highlighted in our previous Pre-Budget Submissions our concerns about the low participation of people with disability in employment and training. Increasing the rate of employment of people with disability remains a key priority in this submission.

This emphasis is strongly supported by the National Disability Strategy which advocates that the economic independence that employment brings is important as it enables people with disability to exercise more choice in their lives, aids them to live independently and facilitates their inclusion in the community. Income from employment increases financial independence and raises living standards.

Participation in the labour market is a major determinant of living standards. Paid work is the means through which many people obtain the financial resources needed for day to day living for themselves and their dependants, and meet their longer-term financial needs. Income from paid work influences outcomes in many areas of life, such as housing, education and health and well-being. The returns from paid work can continue into retirement, providing material comfort and financial security.

These are issues also covered in the United Nations Convention on the Rights of Persons with Disabilities which recognises the right of persons with disabilities to work, on an equal basis with others. This includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and in a work environment that is open, inclusive and accessible to persons with disabilities (Article 27).²⁸

Under-representation of People with Disability in the Workforce

There are significant challenges involved in meeting this policy agenda. Australians with disability are clearly under-represented in the labour force, have markedly lower labour force participation rates and higher unemployment rates, than people without disability. Many face significant barriers to employment.

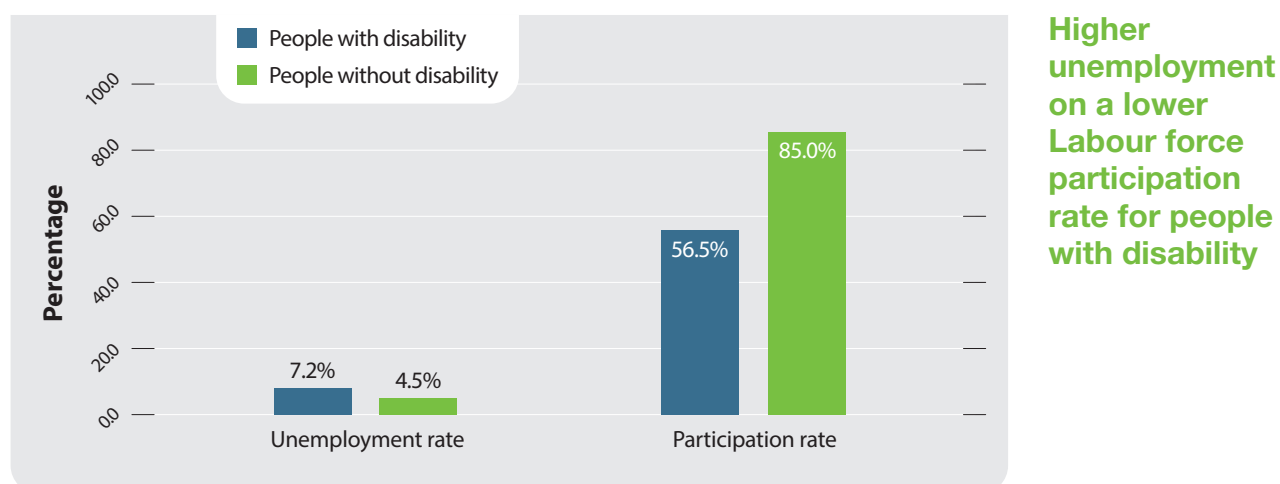
In 2010, Australia's employment rate for people with disability was ranked 21st out of 29 members of the Organisation for Economic Cooperation and Development (OECD).²⁹ A 2010 OECD report finds people with a disability in Australia are half as likely to be employed as people without a disability, when the OECD average is 60 per cent.³⁰ Australia-wide labour force outcomes for people with disability remain below the 2009 United Nations target. The 2010 OECD analysis of disability employment shows that Australia's participation rate for people with disability is below the OECD average, although participation rates for people without disability are very high - at the top of the OECD league table.³¹

Historical data indicates there has been little progress in improving the labour force outcomes for people with disability in Australia over the 16 years from 1993 to 2009. Labour force participation rates have been stagnant for all people with disability.³² Overall, the employment rate for working age people with a disability has declined since the mid-1990s and during the mid-2000s.

However, some OECD nations have achieved or surpassed the benchmarks for employment participation that would achieve the potential economic gains calculated by the 2011 Productivity Commission inquiry into a long-term disability Disability Care and Support Scheme, proving they are realistic. Similarly some Australian jurisdictions have also achieved better results than others. For example, the ACT has recorded a participation rate for people with profound or severe disability of 51.7 per cent, when the national average is 31.3 per cent.³³

However, this is not the case for Western Australia, where people with disability are underrepresented in the labour force with a higher unemployment rate of 7.2 per cent compared to 4.5 per cent overall (ABS 2012), and lower labour force participation rate of 56.5 per cent, well below the workforce participation rate of people with no disability at 85 per cent (shown at Figure 5).³⁴

Figure 5: Labour Force Participation Rates of People Aged 15-64 years, by Disability Status, 2009³⁵



Specific research exploring the reasons for this under-representation of people with disability in the Western Australian workforce has not been undertaken.

National research indicates that the low labour force participation rate can be partially explained by employer perceptions that there are additional costs and, or, marginal inefficiencies associated with hiring people with disability. However, concerns about financial and other risks are largely unfounded with Australian research confirming that typically employees with disability, when compared to those with no disability, recorded fewer days' absence, fewer Occupational Safety and Health (OSH) incidents, fewer workers' compensation incidents, lower recruitment costs, lower accrued sickness and absence costs, lower accrued OSH costs and lower accrued workers compensation costs.³⁶

People with disability are an underutilised labour resource, which may in part be the result of low awareness of support mechanisms available to employ people with disability and a lack of understanding of the benefits people with disability bring to the workplace.

The Australian Chamber of Commerce and Industry states that independent studies show that employees with disability provide significant benefits to individual businesses and that employees with disability are reliable, productive and affordable.³⁷

Strong Benefits of Employing People with Disability

There is abundant evidence of the social and economic benefits of increasing employment levels of people with disability and their families.

People who work contribute to society, gain financial independence, enjoy a better standard of living, often experience improved physical and mental well being and increased confidence, expand social networks and skills, and have opportunities to develop a career and further expand their skills and knowledge. Participation in the labour force and employment is beneficial to the overall well being of people with disability by providing opportunities for self development and financial independence.

Labour force participation and employment of people with disability provides an indication of how successful communities are in assisting them to participate fully in the community.

Data on work intentions in the 2009 Survey of Disability, Ageing and Carers showed that about 200,000, or one quarter of people with disability, were not currently working, indicated they could work (a quarter of the current Disability Support Pension [DSP] population). OECD and NDS research also shows that if this potential labour force is activated it will reduce the fiscal pressures of an ageing population. Public expenditure per capita rises as the population ages and the pool of taxpayers to fund the extra expenditure declines. So more is asked of fewer taxpayers.³⁸

Economic Benefits

Research conducted by NDS indicates that although the social policy arguments for increasing employment opportunities for people with disability are well established, the economic benefits are not well understood. The research suggests that disability employment is an important part of the participation agenda of Government economic policy and this analysis shows that there is potential to lift the employment rate of people with disability markedly.

It also shows the potential that raising levels of disability employment would have in addressing macroeconomic challenges faced due to an ageing population. Empowering persons with disability to work would create a significant long-term increase to labour force participation. The analysis shows that over a quarter of those with disability currently outside the labour market may enter it if the appropriate supports are made available. This is a significant potential pool of new labour market entrants and a numerically significant population cohort.

Importantly, NDS modelling indicates that employment growth for persons with disability will reduce the cost of the NDIS scheme over time. Although difficult to quantify, there will be savings to Government from increased taxation revenue and reduced outlays. NDS demographic and economic modelling shows that the total extra wages and salaries generated would be \$5 billion. If the cost of the NDIS is assumed to be \$6 billion to Australia, and the saving due to increased taxation revenue and reduced benefits was \$1.5 billion, then these employment benefits would offset the cost of the NDIS by roughly a quarter per annum. Although this analysis uses rudimentary calculations, it indicates the significant quantum of direct taxation revenue and reduced NDIS costs greater employment could create.³⁹

The model suggests that the economic gains of fully employing people with disability who are able to work are immense. The best and most efficient way to deal with the problem of the low employment participation rate of people with disability is to increase employment opportunities.

Skills Australia estimates that Australia will require an additional 2.4 million people in the workforce with qualifications at Certificate III level and higher by 2015; increasing to 5.2 million by 2025, to meet projected industry demand and replace retiring workers. They also indicate that the vocational education and training (VET) sector has a major role

in responding to this challenge and reaching people who have only been marginally or intermittently connected to the world of work and formal education.⁴⁰ The 2014 Chamber of Commerce and Industry Western Australia State of the Future Report, which provides a vision for Western Australia over the next 20 years confirms this substantial employment growth indicating an additional 740,000 people employed in Western Australia over that period.⁴¹

The National VET Equity Advisory Council (NVEAC) reported that if existing VET pathway gaps were eliminated for the Aboriginal and people with disability populations, the positive impacts on key national economic indicators are significant; with Access Economics projecting that in 2020:

- Real Gross Domestic Product (GDP) would increase by \$12.2 billion;
- Real consumption would increase by \$5.9 billion; and
- Full time equivalent jobs would increase by 118,000.⁴²

It is therefore critically important to implement training and employment strategies that specifically target people with disability and aim to increase their employment opportunities. This is particularly important given the prevalence of disability is expected to increase significantly as the population ages. One in four people will have a disability by 2025, a significant proportion of Western Australia's population and potential workforce.

This message is very clear in the National Disability Strategy, which highlights:

“It has been estimated that the Australian community is contributing to an annual recurrent cost of \$18.8 billion dollars per annum by not addressing the vocational training needs of people with a disability. Failure to address this issue nationally is keeping productive people out of the workforce. Research shows that people with vocational education and training qualifications are more likely to be employed than those who have no post-school qualifications. People with a disability, however, are not reflected in participation rates compared to their presence in the community (ANTA, 2000)”.⁴³

State Government Leadership

Improving the Employment of People with Disability in Public Authorities

The Government of Western Australia has demonstrated commitment to policy that supports jobs for people with disability by adopting some previous NDS WA Pre-Budget Submission recommendations.

This includes:

- Providing a Payroll Tax Exemption for employers who hire a new employee with a disability – funding of \$5 million over four years to 2015-16 that provides benefits to approximately 2,100 new employees;⁴⁴
- The Disability Employment Strategy 2013-2015, a joint initiative between the Public Sector Commission (PSC) and DSC, launched an Employment Strategy

through the Public Service Commission on 26 August 2013 that positions the Western Australian public sector, as the State's largest employer, to make a significant contribution to the employment and career development of people with disability;⁴⁵ and

- Funding for procurement exemptions for Australian Disability Enterprises (ADEs), funding for a specialist disability procurement position in the Department of Finance to support and coordinate public sector procurement from ADEs. Since 2010, Government agencies had been allowed to engage ADEs directly, without undertaking a competitive quote or tendering process, as long as the service or product being offered represented value for money. This has resulted in 27 WA Government agencies awarding 73 contracts to ADEs since 2010 valued at over \$21 million. The variety of agencies that have taken up the opportunity highlights just how successful this initiative has been for Western Australia's eight ADEs and the 2,100 people they employ.⁴⁶

While these initiatives are most welcome considerable further investment is required. The State Government's commitment to policy that supports employment for people with disability must be supported by adequate funding to support reform initiatives.

Public Sector Leadership

It is vital for the public sector to attract and retain skilled workers to remain effective in servicing the needs of the community, and to maintain a workforce that is reflective of the diverse Western Australian community.

In 2012, WA committed to the National Disability Strategy. This partnership aims to drive improved services in delivering outcomes for people with disability, and to ensure people with disability participate as valued members of the labour force and broader community.

The launch of the Disability Employment Strategy 2013-2015, was most welcome, including the associated accountability mechanisms incorporated in the Strategy, which are essential to ensure ongoing commitment and success. NDS WA supports that Government agencies will be required to report on initiatives to increase the employment of people with disability.

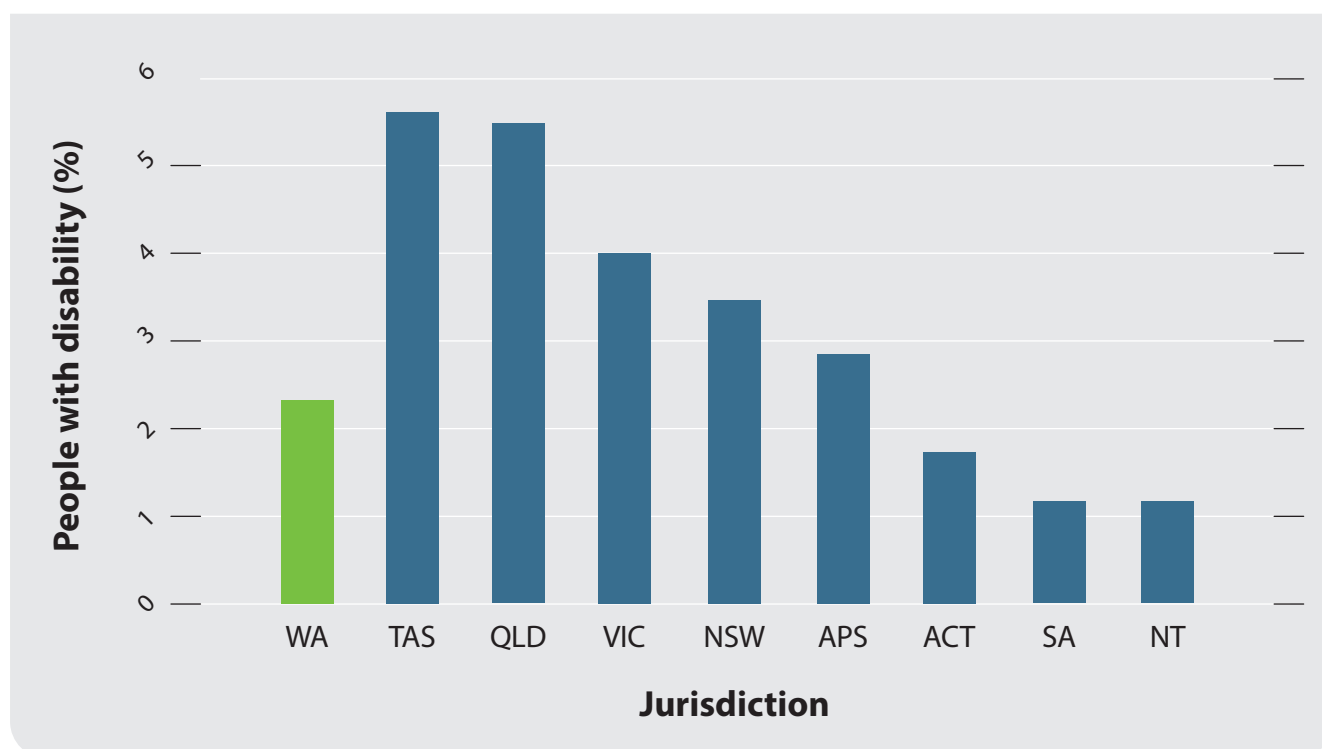
The PSC and DSC, in collaboration with agencies, will:

- Report twice a year to the Public Sector Employment of People with Disability reference group on the progress of initiatives in the strategy;
- Promote and encourage high level commitment to disability employment issues at Chief Executive Officer forums;
- Develop a monitoring and evaluation process to assess the success of the Strategy; and
- Investigate including disability employment as part of Chief Executive Officer performance agreements.

However, NDS WA highlights to Government that it is concerning that the Government of Western Australia, Director of Equal Opportunity in Public Employment (DEOPE), Annual Report 2014, indicates that the employment rate for people with disability continues to fall shown at Figure 6 below.

The proportion of people with disability in the Western Australia public sector in 2014 was 2.3 per cent, declining from 2.6 per cent in 2013. This positions WA below the major States such as NSW, Victoria, Queensland and also below Tasmania and the Australian public sector.⁴⁷

Figure 6 Representation of Employees With Disability Across Public Sector Jurisdictions, 2013 and 2014⁴⁸



NDS WA has previously highlighted to the State Government that the DEOPE assessment that this result is a favourable outcome when compared to the estimated proportion in the Western Australia working age population needing assistance with core activities (1.9 per cent) is clearly misleading.

NDS WA highlights that this comparison is not appropriate as a performance measure. The level of representation is very low when compared to the Western Australia working age representation of people with disability at 8.3 per cent – or those with profound or severe activity limitation at 1.6 per cent, with moderate or mild core activity limitation at 4.1 per cent with schooling or employment restriction at 5.3 per cent or with all specific limitations or restriction at 6.9 per cent. Similarly, the representation of employees with disability in other Western Australian public authorities also remains low at 1.6 per cent.⁴⁹

On the contrary, the hard evidence is that the proportion of people with disability employed by Western Australian public authorities including the State Government public sector remains low and has continued to decline over the last decade (shown at Figure 7).

Figure 7 Representation of Employees with Disability Across Public Sector Authorities, 2013 and 2014 ⁵⁰

		Representation (%)				
		2010	2011	2012	2013	2014
Public sector	All staff	3.5*	4.2*	4.8*	2.6	2.3
LGA's	Indoor workers	1.8	n/a	1.7	1.7	1.4
	Outdoor workers	3.3	n/a	3.1	2.9	3.0
Public universities	Academic staff	1.4	1.9	1.7	1.8^	1.4
	General staff	1.5	1.7	1.3	1.5^	1.2
Other authorities	All staff	1.7	1.5	1.5	1.6	1.4

The State Government must provide strong leadership to all Government departments and agencies and public authorities to increase the number of people with disability they employ. Deliberate affirmative action strategies with respect to increasing the employment of people with disability can and do work as demonstrated by the organisations such as Westpac who report that in 2012, 12.1 per cent (up from 10.4 per cent in 2010) of their workforce were people with disability, one of the highest levels disclosed across corporate Australia.⁵¹ Similarly, the Australian Government Department of Health and Ageing reported 10 per cent of its workforce were people with disability.⁵² These rates of employment are well above the 2.3 per cent recorded in 2014 for the Western Australian public sector.⁵³

While acknowledging the positive initiatives that have been implemented by the State Government on a number of disability employment fronts, there is much that still needs to be done to ensure that people with disability have adequate access to training and employment pathways that will enable them to fully participate in our community.

Ticket to Work and Employability Skills Development

The research indicates that the alignment between job need and supply (employability skills development) is reliant upon relationships between Disability Employment Services, schools, employers and other services essential to the transition of young people with disability. Funding to receive such support is available to school leavers and people with disability through the NDIS, and is reliant on the individual and their family requesting such support during the planning process. This has been captured in the Pathways to Employment Framework that NDS has developed and is disseminating to the DSC as part of the School Leaver Transition Project.

The essential elements of a successful transition include being self-directed and having high expectation, as well as linkages between key transition partners (collaboration) and natural support networks.

It was recognised that an ongoing and structured network was required to enable providers to meet these essential elements, and to support providers to deliver this job readiness and ongoing employment support. NDS has recognised the Ticket to Work Network as a suitable model to provide the necessary community structure for these linkages and ongoing relationships to be achieved.

This model has been piloted in the lower South West by transforming the existing Community Reference Group into the Lower South West Ticket to Work Network. NDS are facilitating this group for the next 12 months, with Forest Personnel having accepted the role of lead agency from June 2016. NDS have also facilitated a meeting with the South Metro Education Region Youth Attainment and Transition Network, with the project team facilitating a transformation of this network into the Kwinana/Cockburn Ticket to Work Network.

The ability of these networks to strengthen the alignment between job need and supply has been increased by incorporating the role of Ticket to Work into both the Transition to Employment Framework and the proposed training package to be provided to transition partners. This will ensure moving forward that organisations or services interested in the transition of young people with disability into the workforce will be encouraged to engage with the Ticket to Work networks, helping the network maintain relevance to the local community and ensuring all young people have access to the opportunities. It will also provide a strategic and connected network of like-minded organisations for employers, families and government to engage with at a local level about employment opportunities and issues present for people with disability.

A gap has been recognised, in that as NDIS is implemented throughout other regions within the State there will be no funding allocated to the development of such networks (as is available in the School Leaver Transition Project). A recommendation for government should be that funding be provided to NDS to facilitate and broker relationships and establish Ticket to Work Networks in all regions receiving NDIS support to ensure the infrastructure exists to transition people disability into their chosen form of open employment. Each network could improve its potential to deliver collaboratively projects and services that will improve employability skills for young people with disability by having access to some funding through this brokerage organisation to support NDIS supported people with disabilities, such as structured work experience programs, employability skills development programs, or employment promotion campaigns for people disability.

It would be important that the organisation brokering these relationships and establishing Ticket to Work be removed from existing disability employment provision services, such as Australian Disability Enterprise and Disability Employment Services, to ensure a holistic view of employment that is not skewed towards a particular model.

The ongoing funding of the National Disability Coordination Officer is something to consider, which may be funded at a federal level but is currently under review.

Disability Employment Action Plan

NDS WA supports the development of a Disability Employment Action Plan to fund and implement the following strategies to tackle this serious issue.

1. As a starting point, NDS WA believes that Government needs to ensure that the Disability Employment Strategy is adequately funded to ensure the PSC is able to implement its initiatives. This includes investing in a dedicated Public Sector Disability Employment Unit (a small specialist unit within the PSC) to promote and monitor employment of people with disability in the public sector and the implementation of the strategy.

NDS WA also recommends that the current accountability mechanisms be further strengthened by requiring that employment targets are set by Western Australian Government Departments and agencies and annually reported to the PSC, with annual reporting by the PSC on a whole-of-Government basis to Parliament to allow it to determine whether progress has been made in increasing the number of people with disability in the public sector workforce.

These initiatives should be supported by direction at a whole-of-Government level to appoint disability champions across the State Government sector to promote disability employment and be the disability 'go to' person within a department or agency.

2. A further NDS WA recommendation is that the strategy should include more specific actions to engage the support of Disability Employment Services (DES) to increase the employment of people with disability in the public sector.

NDS WA also proposes funding for a sector based project to be administered by NDS WA, the peak body for non-Government disability services, to promote, coordinate and broker State Government employment opportunities with Disability Employment Services (the NDS WA DES Coordinator). The State Government has provided similar funding for an Executive Officer to assist Australian Disability Enterprises (ADEs) to secure contracts with the State Government (\$457,000 over the period 2013 to 2016-17) and this project has been an outstanding success. Western Australian Government agencies have awarded \$21.5 million worth of contracts to ADEs since the initiative began in 2010. This support has provided increased job security to hundreds of people with a disability and given them the opportunity for meaningful employment.

The NDS WA DES Coordinator would connect people with disability looking for work through Disability Employment Services providers with public sector employment opportunities. They would provide support when initially placed into a job, including advice about on the job training and co-worker and employer support. The Coordinator would also advise Government agencies of their responsibilities with respect to Government targets to increase the employment of people with disability. An additional benefit would be that the NDS WA DES Coordinator would have access

and links to the NDS National Employment Committee and sit on the NDS WA DES Employment Committee.

In addition, the Government of Western Australia should mirror the Australian Government rule which allows a person with disability to be employed without having to conduct a full competitive merit assessment process if an agency uses a DES provider. This removes the requirements for Agencies to assess potential employees, design specific positions and provide ongoing employment support, as all of these functions are more appropriately delivered by a DES provider.

3. Specific employment funds for the NDIS are required to elevate the importance of work. This should include project funding to develop pre-employment readiness strategies with a focus on expanding the Ticket to Work Network as the NDIS is rolled out across Western Australia.
4. The State Government leadership should also challenge public authorities, the private and not for profit sectors to 'raise the bar, and increase their level of employment of people with disability. Funding a Western Australian community education campaign to promote the benefits of employing people with disability to not for profit and private sector organisations would assist in ensuring that businesses across the State realise the benefits of employing a diverse workforce.
5. Ensure the continuation of the Payroll Tax Exemption initiative for employers who hire a new employee with a disability included in the State Budget 2012-13 and for which \$5 million over four years was provided to 2015-16. It is critical that ongoing funding is provided for this employment program that has benefited approximately 2,100 new employees over the budget period;

Recommendations For Action

6. Develop a Disability Employment Action Plan that provides investment in employment solutions in the State public sector. This investment in a coordinated Government strategy to achieve better employment outcomes for people with disability is critical and should include the following:
 - 6.1 Resource the effective implementation State Government Disability Employment Strategy to enable the Public Sector Commission (PSC) to action the initiatives outlined in the Strategy. This would include:
 - Funding for a dedicated Public Sector Disability Employment Unit (a small specialist unit within the PSC) to promote and monitor employment of people with disability in the public sector and the implementation of the strategy;
 - The Government of Western Australian to set disability employment targets for departments and agencies that are annually reported to the PSC and to Parliament. This data will provide a benchmark to determine whether progress has been made in increasing the number of people with disability in the public sector workforce; and
 - Resource pivotal employment strategies to increase the number of people with disability employed in the State public sector including the funding of entry level positions such as traineeships specifically designated for people with disability.
 - 6.2 Funding for a Disability Employment Services Coordinator to better align employment opportunities in the State Public Sector with prospective Disability Employment Services employees. The PSC sector based project to be administered by NDS WA, the peak body for disability services, to promote, coordinate and broker State Government employment opportunities with DES (the DES Coordinator).
 - 6.3 Provide Specific employment funds for the NDIS are required to elevate the importance of work. This should include long term project funding to develop pre-employment readiness strategies with a focus on expanding the Ticket to Work Network as the NDIS is rolled out across Western Australia.

- 6.4 Funding a Western Australian community education campaign to promote the benefits of employing people with disability to not for profit and private sector organisations would assist in ensuring that businesses across the State realise the benefits of employing a diverse workforce.
- 6.5 Provide funding for the continuation of the Payroll Tax Exemption initiative for employers who hire a new employee with a disability. The \$5 million provided over four years ceases in 2015-16. It is critical that ongoing funding is provided for this employment program that has benefited approximately 2,100 new employees over the budget period.



7.

Economic Security

PRIORITY 7: Effective Housing Solutions

Summary

A 2014 study conducted by the Curtin University Not for profit Initiative (Curtin) on behalf of NDS WA highlights critical housing tenure and ownership issues for people with disability in Western Australia.⁵⁴

It identified that people with disability and their families have significant difficulty in finding suitable and affordable housing in Western Australia. Resolving the housing and accommodation issues for people with disability is complex and the identification of holistic prescriptions is not simple. To meet the challenges identified in the report there needs to be an ongoing dialogue between Government, industry and NDS WA with a view to prioritising recommendations, identifying timelines and evaluating results.

NDS WA advocates that as part of its State Budget 2016-17 deliberations the State Government should attack this issue on two fronts.

At a whole-of-government level it is recommended that the State Government develops in partnership with disability services sector organisations, people with disability, Government housing departments and agencies and the private housing sector an overarching, well-considered whole-of-Government Comprehensive Housing Policy for people living with disability in Western Australia. This would consider the key systemic recommendations of the Curtin housing report including increasing the supply of accessible housing by mandating that Universal Design principles will be incorporated in all social and community housing projects and rebating or removing the requirement to pay any Stamp Duty on personal home purchases by people with disability.

Secondly, develop a communications strategy including publications, as recommended in the Curtin report, to inform the public and other key stakeholders about available schemes and potential opportunities to support increased home ownership and security of tenure for people with disability.

The Issue

NDS WA acknowledges that the State Government has made significant investments in housing for people with disability as part of the State Budgets in 2011-12, with \$95.7 million for homes for people with disability and again in 2013-14 through a commitment of \$6 million to establish suitable accommodation options for young people with disability currently in aged care facilities.⁵⁵

The 2015-16 Budget also included a new \$560 million Social Housing Investment Package (SHIP). The package will deliver 1,000 new social homes which will be built, purchased or leased over 2015-16 and 2016-17, and aims to halve the number of seniors and families with children on the priority waitlist by 30 June 2017.⁵⁶

People with disability are not specifically targeted by this package yet they are one community group with critical housing requirements. Many face adverse economic circumstances, medical needs that are exacerbated by their housing situation, and inadequate supply of appropriate universal housing.

A large number of people with disability are not able to access housing, or the accommodation services and support they require. Despite this substantial past investment and a commitment to deliver additional accommodation, unmet need continues to exist.

The Western Australian community, and Government as a whole, including the social housing sector, need to be better positioned to deal with the challenge of housing demand posed by our ageing population, while also considering the implications that the rising incidence of disability will have for rental incomes, service provision, housing design and other key social housing factors.

People with disability in Western Australia face specific critical challenges on numerous fronts. Increasing costs for all types of housing, together with a shortage of supply, have been the main issues over a sustained period. Rental costs have increased to such an extent they can preclude people saving deposits to move into home ownership. There are also challenges in creating so-called affordable housing, aimed traditionally at low income users, but increasingly needed by average income earners. In such a situation, this puts extra stress on people with disability and their families, especially when their extra costs and design needs are factored into the equation in the context of raising purchase capital and meeting repayments over time.

Housing for People with Disability

NDS WA Home Ownership and Affordability for People Living with Disability in Western Australia Study – Key Findings Government Should Consider ⁵⁷

NDS WA highlighted in our PBS 2015-16 the key findings of a 2013 study conducted by the Curtin University Not for profit Initiative (Curtin) exploring critical housing tenure and ownership issues for people with disability in Western Australia.

Curtin examined the barriers to home ownership experienced by people living with disability, and also considered related topics such as tenure of housing, quality of housing solutions experienced and existing policies and programs.

The findings include:

1. The research confirmed that housing security and tenure are key issues for people with disability. There is generally more concern with the quality, security of tenure and cost of the home than with who owned it.
2. People living with disability are more likely on average to have lower incomes, live in rented homes and to depend on social security payments than the rest of the population. They also spend proportionally more of their income on housing with many suffering housing stress.
3. The high cost of improving or modifying homes is a challenge that is financially difficult to meet for some people with disability resulting in homes being inadequately maintained.
4. A high level of housing stress was identified. Thirty one per cent of people in the research survey spent more than 60 per cent of their income on housing. Living with disability often brings extra costs, which can only add to the levels of stress these people face.⁵⁸
5. Specifically, the report highlights that the Western Australian housing market presents significant challenges for people with disability. These are characterised by significant increases in house and rental prices over recent years, supply shortages, a lack of suitable Universal Design and significant costs associated with maintain and refitting housing for people with disability.
6. The three main factors in the housing equation for people with disability – availability, affordability and accessibility. In a period of considerable population expansion such as Western Australia has seen in recent years, affordability and accessibility are driven by availability to a significant extent. Both relative and absolute affordability of housing in Western Australia has increased markedly in recent years. In September 2013 the median house price in Perth was \$530,000 (Landgate, 2013), one of the highest in the nation and is currently at \$549,000 (June 2014).⁵⁹ As well as prices increasing rapidly in absolute terms), housing has become increasingly unaffordable. In 2010 a median priced house in Western Australia cost at least 6.5 times the median income, compared to 3.9 times in 2001 (WA Department of Housing, 2012, p. 11). The trend towards decreasing affordability has been described as a structural shift in Australia.⁶⁰

7. Housing availability is also a key part of the equation. Western Australia's strong and expanding economy has placed increasing stress on housing stock in the State. National research shows that in 2012 there was a shortfall of 38,000 dwellings in Western Australia compared to 2001. This means that since 2001 the overall housing stock had fallen 38,000 dwellings short of identified need. This shortfall has increased by about 4,000 dwelling per year for the past few years (National Housing Supply Council, 2012).⁶¹
8. Housing stress for people with disability caused by lower income levels. People with disability live in lower income households than people without disability. In the 2009 Survey of Disability, Ageing and Carers, 23.2 per cent of people with disability aged 15 to 64 years and 9.4 per cent of people without disability were living in households in the lowest 20 per cent of income distribution.

The Curtin research also indicated that income levels for people living with disability are lower than community averages. The median income for households including people living with disability was 33 per cent lower than for households with no disability (Saunders, 2007, p. 469). The problem of lower income is exacerbated by the fact that people living with disability also tend to experience a higher than average cost of living.⁶²

The individual median weekly gross income in 2009 for all people with a disability was \$390, compared to \$724 for people not reporting disability (ABS, 2012). This reflects the high reliance on Government transfers for this group. This figure is similar to a United States finding that people living with disability were likely to earn about 60 per cent of the median income (and were three to four times more likely to be living in poverty) (Hagner and Klein, 2005, p.194).

9. There is a widening gap between housing prices and the income levels of people with disability and that they spend a higher proportion of their income on housing. Given the low income levels reported by the survey population it is clear that severe housing stress was being experienced by many of the people surveyed. The housing affordability picture is made worse when the additional living costs that people with disability face are also considered.

Curtin Research Key Findings⁶³

- 50 per cent of people surveyed spent more than 40 per cent of their income on housing.
- 39 per cent spent more than 50 per cent on housing costs.
- 31 per cent more than 60 per cent of their income on housing.
- 64 per cent of respondents spent more than 30 per cent of household income on housing costs.

The key Recommendations of the NDS WA Home Ownership and Affordability for People Living with Disability in Western Australia Report

NDS WA is supportive of the overall finding of the Home Ownership and Affordability for People Living with Disability in Western Australia report that reiterates that at a very high level, the problems associated with the current lack of affordable housing are supply of suitable housing stock, the costs of building or acquisition, and ongoing maintenance and payment. The report found that there are a number of issues that diminish the opportunities for people living with disability to own their home, to enjoy extended tenure and, or, to achieve a satisfactory housing solution within their usually very limited financial means.

NDS WA urges the Government of Western Australia to support the key recommendations of this report and that it should strongly consider the findings of this research when developing housing policy for people with disability.⁶⁴

NDS WA advocates that the State Government as part of its State Budget 2016-17 deliberations should attack this issue on two fronts articulated in the below budget recommendations.

Regional Housing

NDS WA has consulted with the Council of Regional Disability Services (CORDS) to better understand the challenges for people with disability living in regional and remote areas of Western Australia. The CORDS was established in 2004 to enable people in leadership roles in regionally-governed disability services to share information and address common challenges.

The CORDS have identified that people with disability in regional Western Australia are at significant disadvantage due to the lack of suitable housing for people with disability. A prime consideration is to ensure an equitable housing system which provides appropriate homes for individuals with disability in regional and remote WA. Typically these areas have limited housing stock suitable for people with disability as well as the higher costs compared to the Perth metropolitan area associated with a universal refit of existing stock.

A priority issue and challenge identified by CORDS is to address this issue in the transition to the NDIS across Western Australia.

The State Government should give particular consideration to developing strategies to assist people with disability in regional and remote locations including options around subsidising the cost of housing and the renovation of existing homes, improving access to affordable housing finance for the purchase of homes and ensuring all social housing projects undertaken by Government comply with Universal Design principles.

Recommendations For Action

The State Government attacks the critical housing tenure and ownership issues for people with disability in Western Australia on two fronts:

- 7.1 Fund a joint Disability Housing project for National Disability Services, the DSC and the Department of Housing to action key recommendations of the NDS/Curtin Housing Ownership and Affordability for People Living With Disability Report including a specific focus on implementation of these recommendations in the NDIS full scheme implementation. The project should investigate options to bring forward future personal disability support funding to be used to purchase housing, including developing models for implementation.

A particular focus of this project would be to develop and distribute a suite of disability housing publications to the social housing sector, the disability services sector, especially Local Area Coordinators, the commercial real estate sector, the building and real estate industries, public accountants, and people living with disability. The publications will provide information on:

- The range of policies, programs and disability service organisations available;
- Details on disability loan products, their intended target demographic, their intended purpose and include information on further steps and risks associated with each product;
- A comprehensive schematic view of the policies, agencies and programs in this area;
- A comprehensive description of affordable rental arrangements existing for people with disability; and
- An enhancement of guidance, strategies and exemplars for adopting Universal Design principles for the building industry and consumers. The focus of the project will be to undertake this work and prepare this information for the roll out of the NDIS across Western Australia.

- 7.2. At a whole-of-Government level it is recommended that the State Government develops in partnership with disability services sector organisations, people with disability, Government housing agencies and the private housing sector an overarching, whole-of-Government Comprehensive Housing Policy for people living with disability in Western Australia that:

- 7.2.1 Explores options for systemic measures to address housing affordability and cost issues including rebating or removing the requirement to pay any duty related to personal home purchases by people with disability, better targeting disability access to the First Home Owners Grant (FHOG), and reassessment of existing Government supported loan products recognising disability income levels and the additional costs for people with disability in owning or renting a home;
- 7.2.2 Increase the supply of accessible housing by mandating that Universal Design principles will be incorporated in all new social housing projects or any refit or renovation of housing projects undertaken by Government;
- 7.2.3 Develop a Universal Design Ratings Code for housing in Western Australia and investing in the development of Universal Design Star Rating system in partnership with NDS WA and the private sector;
- 7.2.4 Introduce a State-wide affordable housing levy that guarantees 3 per cent of the total floor area for all new residential housing developments is used for affordable housing. All affordable housing that is built under this levy must meet the gold level Liveable Housing Australia accreditation standards;
- 7.2.5 Introduce a State-wide affordable housing levy that guarantees 3 per cent of the total floor area for all new residential housing developments is used for affordable housing. All affordable housing that is built under this levy must meet the gold level Liveable Housing Australia accreditation standards;
- 7.2.6 Explore options to mandate that all future property developments must assign a predetermined allocation specifically for the provision of universal housing;
- 7.2.7 Reassess existing Government supported loan products such as Keystart including better communication of these products to people with disability; and
- 7.2.8 Reassess the operation and effectiveness of rent and housing assistance programs to assist people with disability.
- 7.3 Explore options for the better provision of appropriate regional housing for people with disability living in regional and remote parts of Western Australia.



8.

Inclusive and Accessible Communities

PRIORITY 8: **Improving Accessibility of Community Services**

Summary

NDS WA welcomed the Government of Western Australia's commitment of \$2 million towards the development of a Changing Places Network across Western Australia for the 120,000 West Australians with severe or profound disability and many cannot use standard accessible toilet. These Changing Places will include a height-adjustable adult-sized changing bench, a tracking hoist system, space for a person with disability and two carers, as well as a non-slip floor and a safe and clean environment.

It is intended that the Changing Places in public facilities will be secured with an electronic locking system minimise the risk of theft or damage, and that approved users, their carers and support services will access the facility with a swipe card. Through its management of the Western Australian Companion Card program, for people with a significant permanent disability, who need carer or companion support in order to participate in activities, NDS WA is well placed to extend their activities to issue electronic keys to eligible Changing Place users.

To further improve the accessibility of community services for people with disability in Western Australia more needs to be done to counter the frequent abuse of ACROD bays by people who don't have a permit. This is exacerbated by inconsistent enforcement and inadequate penalties.

The ACROD Parking Program has played a pivotal role in providing social inclusion opportunities for people with a mobility disability by providing better community access, including opportunities for employment and leisure for over 25 years.

Although NDS WA applauds the State Government's announcement in 2014 to increase court imposed penalties for misusing ACROD parking bays from \$1,000 to \$2,000 and on the spot fines from \$120-\$140 to \$300, there is more that can be done to deter the misuse of these parking bays by people with no disability. ACROD permit holders must have full access to designated parking bays at all times

Further changes are required that amend existing ACROD legislation to allow for prosecution coverage for private property ACROD bays, to address monitoring and compliance issues and for a dedicated communication and education ACROD campaign.

The Issue

Research shows that people with restrictions in core activities are considerably more likely to experience difficulty getting to places they need to go than people without disability. This restricts their economic and social participation in community activity.

For example, the ABS 2010 General Social Survey (GSS) shows that:

- Despite the increasing importance of the internet as a source of information and a mediator of participation across a range of social and community activities, a digital divide exists between people with disability and people without disability. The 2010 GSS shows that people with restrictions in core activities were considerably less likely than people without disability to use computers and access the internet;
- That there is a connection between disability and social isolation. The 2010 GSS shows that people with restrictions in core activities had a lower level of social attachment than people without disability, as measured by all forms of daily contact with family and friends, ability to ask for small favours and ability to get support in a time of crisis;
- Compared with people without disability, people with restrictions in core activities were also more likely to experience difficulties accessing service providers; and
- People with a severe or profound core activity limitation had lower rates of attendance at sporting and cultural events than people without disability. Increased severity of disability is associated with lower levels of participation in a range of activities outside the home offering potential for community interaction including going out to a café, restaurant or bar, attending a movie, theatre or concert, and visiting a library, museum, art gallery, park, botanic garden or theme park.

Access to Changing Places Facilities

NDS WA commends the State Government decision to invest \$2 million over the next two years to develop a State-wide network of Changing Places which will provide more opportunities for people with disability to participate in community life.

The DSC, working in partnership with the Western Australia Local Government Association, will provide funding for local governments to construct a Changing Places network over the next two years across metropolitan and regional Western Australia in locations identified by the people who will use them and the local governments that will provide them.

This important initiative was a prominent priority in our NDS WA Pre Budget Submissions 2014 and 2015.

An important consideration with the Changing Places facilities is their quick and secure accessibility for people with disability.

It is intended that the Changing Places in public facilities will be secured with an electronic locking system to minimise the risk of theft or damage, and that approved users, their carers and support services will access the facility with a swipe card. Through

its management of the Western Australian Companion Card program, for people with a significant permanent disability, who need carer or companion support in order to participate in activities, NDS WA is well placed to extend their activities to the issue electronic keys to eligible Changing Place users.

NDS WA advocates to Government to jointly work with us to explore options to improve access to Changing Places facilities including developing access technology through the NDS WA Companion Card and mobile phone applications.

Stronger Enforcement of ACROD Parking

NDS WA highlighted to the State Government further considerations for strengthening the monitoring and enforcement of ACROD parking bays.

NDS WA administers the ACROD Parking Program on behalf of the Government of Western Australia. In 2013, the Government announced it would fund the administration fee for ACROD parking permits as part of a four-year \$3.7 million commitment. NDS WA welcomed this announcement as a positive outcome for Western Australian permit holders that will certainly make a significant difference to the many people and families who require ACROD parking to access their community. For over 25 years, the ACROD Parking program has played a pivotal role in providing social inclusion opportunities for people with a mobility disability, through providing better community access, including opportunities for employment and leisure.

The program supports almost 75,000 Western Australians with a mobility disability to access their community. Providing ACROD parking permits to people who use a mobility aid or who have a severe walking restriction, allows permit holders to attend work, medical appointments, leisure pursuits and other daily activities.

Of interest is that older people with disability (those over 65 years) comprise 79 per cent of all Western Australia ACROD permit holders; or 4 of every 5 permit holders. With an ageing population and associated increases in the prevalence of disability, the demand for ACROD parking will continue to rise. NDS WA receives approximately 1,000 new applications per month, and this number continues to grow.

NDS WA commends the State Government's action on to replace the Local Government (Parking for Disabled Persons) Regulations 1988 with the Local Government (Parking for People with Disabilities) Regulations 2014. The regulations were reviewed and updated as a result of the rolling-out of the national initiative and changes implemented by NDS WA and the Department of Transport. The changes include updated terminology and methods of identifying disability parking bays in line with the Australian Standards. The penalty for misusing an ACROD parking bay has also increased. Court imposed penalties will increase from \$1,000 to \$2,000 and on the spot fines will go up from \$120-\$140 to \$300.

NDS WA welcomes these changes and we are pleased that the regulatory framework is now consistent with the national initiative and the Australian Standards. It's a great outcome for permit holders.

NDS WA understands that the National Minimum Parking Concessions agreed by all States are in the process of being changed. For the parking concessions to change, the traffic code needs to be amended by the National Transport Commission Australia.

The penalty for misusing an ACROD parking bay has also increased.

However, despite this progress NDS WA is concerned that the monitoring and enforcement of fines to ensure that ACROD permit holders have full access to designated parking bays at all times is under resourced. NDS WA is of the view that even higher fines are not a significant deterrent on their own. While seemingly heavy hitting they are only effective if they are regularly applied. To achieve this requires regular monitoring as well as enforcement.

The current enforcement process is hit and miss. Some local governments send rangers to regularly monitor ACROD bays. Others do it rarely, with many illegal parkers counting on the latter. To turn this situation around requires the implementation of an even more rigorous fines and monitoring regime of bays which should be supported by the State Government. While it may be argued that this level of monitoring would be expensive, the increase in fines could contribute to the additional costs of more rigorous enforcement.

A further fines consideration to deter illegal use of ACROD bays would be to link the increase in fines to loss of driver demerit points. In 2015 the New South Wales Government announced the introduction of a demerit point penalty, on top of the existing fine for able bodied people found guilty of abusing disabled car parking spaces. Wherever disabled parking offences are currently enforced, whether on a public road or in a car park, the demerit point will apply. A single demerit point will now be added to an offender's record when they misuse a disabled parking space, and a fine. New South Wales is the first to implement the additional discouragement of a demerit point penalty. Other states, including Western Australia and Queensland have sought to discourage able bodied motorists from using disabled spaces by increasing fines in recent years.

Fines alone have been insufficient as a deterrent, despite New South Wales having the highest fine in Australia for the offence. A demerit point penalty that contributes towards licence suspension and also makes drivers ineligible for discounted driver's licence renewal fees and reduced insurance premiums will be a significant additional deterrent to drivers parking illegally in disabled car parks. It will assist in helping people use their moral compass and think twice before choosing to park their vehicles illegally in a disabled car park and should stamp out the irresponsible actions of people who deny disabled people the right to park in these critical car parks.

However, it is not only local governments which need to make enforcement a priority. There is a 'grey area' around disabled parking spaces on private property, where a business has sought to enforce its own parking rules when offering parking to customers. Many ACROD parking spaces are owned and operated by commercial enterprises, such as shopping centres and businesses with independent car parks. At this stage only a minority

of shopping centres are willing to report illegal ACROD parkers or bring in local government rangers. This is a constant source of frustration for their customers with disability who once again feel their business is not as valued as that of people without disability.

The proposed enforcement and monitoring initiatives should be supported with an appropriate community education campaign about the ACROD Parking Program. NDS WA believes that this is critical to raising community awareness of the consequences of abuse of accessible parking bays on the daily life of people with disability. Reasons such as: “I’ll be back in 10 minutes”, “I won’t be long”, “I’m just having a coffee”, or “I’m just going to the ATM” are much more than minor inconveniences to a person with disability. These actions have real impact for people with disability, severely restricting their access to the built environment and community infrastructure. Misuse of ACROD bays limits their participation and inclusion in the wider community. For example, it blocks someone’s path to a doctor’s appointment, children’s schools, business meetings and wherever else people with disability need to go.

People misusing ACROD bays selfishly deny vulnerable members of our community close access to buildings and sufficient room to get in and out of their vehicles.

People with disability have also highlighted to NDS WA that the development of an on-line ACROD permit system should be explored. This would enable eligible people with disability to easily access and print their permits on-line, reducing time lags associated with the processing and postage of permits including misdirected mail.

Companion Card Program Technology Enhancement

The Companion Card is a card issued to people with a significant and permanent disability who require attendant care support from a companion to participate at most venues and activities. Cardholders present their card when booking or purchasing a ticket from a participating business. Participating businesses will recognise the Companion Card and issue the cardholder with a second ticket for their companion at no charge.

The Companion Card Program has been running in Western Australia since April 2006 and provides cardholders with seamless use of the card across Australia. The program has been managed by NDS WA since its introduction in Western Australia in 2006. An impressive 10,000 Western Australian card holders now access leisure, event and public transport options from about 700 affiliated businesses and services.

Increasingly more and more businesses offer the option of booking tickets on-line. Some businesses no longer offer telephone booking at all. However currently there are no businesses in Western Australia that offer the facility to book Companion Card tickets on-line. People with a significant disability who require attendant care support in order to participate at venues and activities can be impeded in accessing tickets to popular events, or can be required to attend a box office in person to purchase tickets in contrast to others in the community who have the convenience of ordering on-line. Strong consideration should be given to exploring options that promote the existing right of people with disability to fair ticketing in the context of technological advances in ticketing systems.

Recommendations For Action

- 8.1 Introduction of a demerit point penalty, on top of the existing fine regime, for able bodied people found guilty of abusing ACROS disabled car parking spaces.
- 8.2 Amending existing ACROD legislation to allow for prosecution coverage for private property ACROD bays.
- 8.3 Further upgrade the level of ACROD parking bay enforcement to including adequate monitoring and overcome compliance issues.
- 8.4 Provide funding to support a community education campaign about ACROD parking including utilising social media.
- 8.5 Provide funding to NDS WA to explore options to develop an on-line ACROD permit system enabling eligible people with disability to access permits on-line and technology that enables people with disability to book Companion Card tickets on-line.



9.

Inclusive and Accessible Communities

PRIORITY 9: **Address Transport Accessibility**

Summary

Public transport is critically important to people with disability, particularly those not able to drive or own a vehicle or who cannot afford to do so due to low income.

The ability to move around the community underpins all aspects of life for people with disability. Access to transport allows people to go to their place of work or study, to access services and take part in social activities.

Despite some progress in accessible public transport, there is still considerable work that needs to be undertaken before all public transport is fully accessible for people with disability in Western Australia.

Despite the creation of the National Disability Standards for Accessible Public Transport 2002 (the Transport Standards) that has a focus on accessibility of public transport for people with disability, there is still considerable work that is required to fully implement the standards across the State.

The NDIS Act 2013 also addresses this requirement with an entitlement to reasonable and necessary mobility supports, including mobility equipment, vehicle modifications, travel training to use public transport and additional transport expenses that arise due to disability.

However transport support in participant plans should not unreasonably displace informal, community or Government transport responsibilities and options. It is important for both the sustainability of the NDIS and progress towards a fully inclusive society that accessible public transport, independent mobility and natural support are enhanced.

Taxis in particular are an important transport solution for people with disability and there are significant issues with this mode of transport that require action to improve services for people with disability.

The Issue

Access to public transport is vital for people with disability, their families and their carers to fully participate in community life. The ability to move around the community underpins all aspects of life for people with disability. It is fundamental to participation in community, social, economic and daily life activities.

The National Disability Strategy seeks to guide public policy across governments to ensure that people with disability have the same opportunities as other Australians. Supporting the National Disability Strategy (NDS) the Disability Discrimination Act 1992 (the DDA) prohibits both direct and indirect discrimination on the grounds of disability, both to the person with a disability as well as family members, carers and friends. The DDA allows disability standards to be formulated in a range of areas including transport through the Disability Standards for Accessible Public Transport 2002 (Transport Standards).

The purpose of disability standards is to spell out in greater detail rights and obligations under the DDA, providing greater certainty about the Act's requirements.

The components of the Western Australian public transport system that are subject to the Disability Standards for Accessible Public Transport 2002 are:

- Bus vehicles, including coaches which are not privately owned, and infrastructure, trains and train stations, and ferries, which are the responsibility of the Public Transport Authority; and
- Accessible taxis and some aviation infrastructure under Department of Transport responsibility.

Review of Transport Standards

While recognising the significant benefits in the creation of the Transport Standards that have a focus on accessibility of public transport for people with disability there is still considerable work that is required to fully implement the standards across the State.⁶⁵

The effectiveness and efficiency of the Transport Standards is vital for people with disability to engage and participate in the community. The Transport Standards were reviewed in 2007 and 2012.⁶⁶

NDS WA articulated in our PBS 2015-16 that the report of the Review of the Disability Standards for Accessible Public Transport 2002 released on 14 July 2014 indicates that between the release of the 2007 Review in 2011 and the start of the October 2012 review, limited progress had been made towards implementing the 2007 Review's recommendations. Three out of the ten recommendations that were agreed to or supported by the (then) Australian Government have been completed, with the rest unable to be implemented. This reflects a lack of agreement between jurisdictions, transport providers and the disability services sector on the adequacy or otherwise of existing services, the technical challenges posed by some of the Transport Standards and, or, a lack of funding.

This review determined that a number of the unresolved issues from the 2007 Review continue to cause concern. Progress against the Transport Standards occurring at an uneven rate depending on the location, population and demand for accessible public transport. There are continuing deficiencies in the physical accessibility of public transport conveyances and infrastructure, the quality of public transport information and engagement of public transport staff, and a lack of effective planning for whole of journey accessibility.

There is also widespread criticism of the absence of a national system of reporting on compliance. Submissions to the review by some Governments, transport providers and operators flag that although the 2012 compliance targets have generally been met, or are close to being met, the December 2017 targets calling for public transport systems to be 80 per cent or 90 per cent accessible may be difficult to achieve unless significant resources are found. To assess whether targets are being met, this review determined that national reporting on compliance is essential. While Government contracted operators generally report on compliance as part of their contractual requirements, there is currently no requirement for private operators.

The major recommendations of the 2012 Review include the following:

- National reporting on compliance – that the Australian Government, jointly with State and Territory Governments, establish a national framework for reporting on compliance by 30 June 2016;
- Modernise the Transport Standards – that the Australian Government, jointly with State and Territory Governments, commence a process for updating and modernising the Transport Standards. This work should be undertaken in close consultation with local government, industry and the disability services sector, and include research on the technical issues raised in this review, the development of options, and assessment of the impact of any proposed changes to the standards, with this work to be completed by 30 June 2016;
- Improved complaints process – that the Australian Government considers the concerns raised about the complaints process;
- Better whole of journey accessibility – that the Australian Government, jointly with State, Territory and local governments, develop accessibility guidelines for a whole of journey approach to public transport planning by 31 December 2015;
- National motorised mobility aid labelling scheme – that the Australian Government in collaboration with State and Territory Governments to develop and implement a national motorised mobility aid labelling scheme;
- National wheelchair accessible taxi compliance milestones – that the Australian Government, jointly with industry, State and Territory Governments, develop consistent national compliance milestones and response times for wheelchair accessible taxis by 30 June 2016; and
- Review of Disability Access Facilitation Plan – that the Department of Infrastructure and Regional Development, in close consultation with the Aviation Access Forum, undertake a review of the Disability Access Facilitation Plan initiative by 30 June 2015, with the aim of improving the overall effectiveness and accessibility of the plans.

In summary, the major report finding of the Review of the Disability Standard for Accessible Public Transport is that a different approach to reporting and assessing progress on implementation of the Transport Standards is needed. NDS WA strongly supports this conclusion. While the intent of the Transport Standards is to provide greater certainty and clarity around obligations under the DDA, as they relate to the provision of public transport without discrimination against people with disabilities, the implementation of the Standards and the recommendations from the subsequent 2012 Review of the Standards needs to be fast-tracked.

NDS WA highlighted this issue as part of our contribution to the National NDS Submission to the Australian Government on progress with the implementation of the National Disability Strategy.

Although the Transport Standards have overall been effective in removing discrimination, they are not optimal in their present form. A number of parts within the legislation, as well as the legislation guidelines, may need to be amended to be more effective.

Accessible public transport is a critical factor in ensuring a sustainable NDIS, consistent with the National Disability Strategy and legally reinforced by the Accessible Public Transport Standards.

However, progress in accessibility has been too slow. NDS has proposed in various submissions to Government that the governance and accountability framework for the Strategy and the Standards need to be aligned and strengthened. In particular, implementation would be assisted by annual progress reports to Parliaments that promote external accountability across Government.

In addition, at a State level, NDS WA in our Pre-Budget Submission 2014-15 advocated the critical need to develop a comprehensive long-term Disability Transport Strategy for people with disability in Western Australia to ensure there is, as far as possible, whole of journey accessibility which enables them to effectively participate in economic and social community activity. A key component of that strategy would be to first assess the progress towards achievement of targets set out in the Transport Standards.

This was not actioned in the State Budgets 2014-15 and 2015-16.

A particular concern is around the transport services provided to people with disability in regional Western Australia where public transport may not be available or not suitable for an individual's needs. In these areas there may not be a sufficient number of individually funded people to sustain a support service through purchased services.

This is supported by Recommendation 7 of the Australian Government's response to the 2007 Review of the Disability Standards for Accessible Public Transport 2002, which determined that, in most cases, regional and rural areas continue to fall behind urban areas in providing accessible public transport services.

Alternative service delivery models need to be considered including expansion of Community Transport where transport options are expanded to a broader spectrum of potential customers by sharing block funded services with other agencies in local government and the aged sector. The pooling of services and cost would provide a more economical model for service delivery into the future in regional and remote parts of the State.

NDS WA reiterates its Pre-Budget Submission 2015-16 recommendation for the development of an overarching Disability Transport Strategy for Western Australia. This strategy would contain targets for the accessibility of public transport under the responsibility of the PTA, as well as targets for the taxi industry in line with the recommendations below.

Transport and the NDIS

The NDIS Act 2013 addresses this requirement with an entitlement to reasonable and necessary mobility supports, including mobility equipment, vehicle modifications, travel training to use public transport and additional transport expenses that arise due to disability.

The transport support in participant plans should not unreasonably displace informal, community or Government transport responsibilities and options. It is important for both the sustainability of the NDIS and progress towards a fully inclusive society that accessible public transport, independent mobility and natural support are enhanced.

Transport and Travel Issues Identified in NDIS Trial Sites

NDS has identified a number of transport issues highlighted across the NDIS trial sites including:

Workers need to travel to support participant goals in diverse settings. The increased choice and control experienced by NDIS participants is accelerating demand for short shifts and a wide range of hours. In these circumstances it is difficult for providers to create regular and combined shifts for workers, and they must be compensated for travel time to make disjointed shifts worthwhile. A sustainable workforce requires pricing for supports to be based on a reasonable cost method that accommodates worker travel costs for short shifts, consistent with industrial rules.

Confusion about transport support across participants and providers. Many current participants receive their transport support funding into their bank account and are expected to pay directly for transport costs such as taxis, and to be invoiced by providers for transport costs within a support program. Problems arise when the participant or nominee is unclear how this funding should be used and what transport costs should be fully or partly subsidised. For example, some people who have previously paid for transport costs indirectly through a program service fee are reluctant to pay specific transport costs out of their plans. In some cases, invoices for transport costs have been received negatively and providers are nervous about complaints if they start charging the real cost of transport.

Providers are also unclear how they should claim transport funding, for example, whether they can claim kilometres through the community participation or community access bundles. There are reports of some providers inappropriately drawing on a participant's transport funding without it being in their service agreement, which potentially leaves other providers with no funding to claim against.

Inadequate and inconsistent transport support allocations. The NDIS has adopted three levels of transport support funding, based on the two levels in the historic mobility allowance plus an additional lower level. The result is a relatively blunt allocation tool which is not responsive to variations in participant circumstances, transport options and related transport costs. Some participants have inadequate allocations. In some cases the annual allocation of transport funding is spent within six months and the provider absorbs the additional cost. In other cases adult participants rely overly on their parents to meet their recreational travel needs, although this is inconsistent with 'ordinary' family expectations. Despite the inflexible funding options, some inexplicable variations in allocations between participants with similar characteristics have been observed. For example, one participant living in supported accommodation was allocated funding for 100 to 150 kilometres travel per week. At the other end of the spectrum, a participant with similar needs was using public transport for a community participation goal, with the result that a two hour support shift was taken up with transport.

Limited transport options. Concerns have been expressed that the full range of appropriate transport options are not being employed. Planning discussions need to apply a cost benefit analysis to vehicle modifications. They need to consider how to build a participant's independence through travel training, for example. Planners need guidance on how to assess what level of transport support should be expected as part and parcel of family and community life, and how to ensure informal networks are complemented. It is important that local transport options, such as community transport or shared shuttles, are available and promoted. However, this can require complex coordination across participants, support providers, transport providers and other community groups, which often does not happen. Providers report missed opportunities for coordinated and efficient transport options for participants.

Withdrawal of some transport options. NDS WA is concerned about the withdrawal of some transport support options from the market. The shift from block grants to individualised funding makes it difficult for providers to sustain a transport fleet. Many providers are considering significantly reducing or selling their fleet which is likely to diminish options for participant transport and their access to community and economic participation. There is also confusion about whether a disability services provider that offers transport support should meet taxi regulation requirements. Some providers have been informed by taxi regulators that this is the case. This comes at a time when there is considerable controversy over the introduction of the Uber transportation service into the taxi market. There is a risk of market failure if taxi services become the only option for participants who cannot access public transport or informal support. The risk is particularly strong in regional, rural and remote communities. This would increase NDIS costs.

Misaligned expectations around worker travel for short shifts. As an outcome of the joint NDS-NDIA pricing project in 2014, the NDIA agreed to allow providers to charge for 20 minutes of the first hour of a short shift of one to one support to cover the cost of worker travel. Some participants have felt short-changed when support delivered in a shift of less than four hours subtracts 20 minutes from the time allocated in their plan. Mismatched expectations like these can lead to tension. If a participant requires a whole hour of support, rather than 40 minutes, the additional time should be funded in their plan.

NDS WA urges the State Government to give consideration to a number of actions to address the above concerns including:

- Clarifying the guidelines for transport support in preparation of the rollout of the NDIS across Western Australia. This would include:
 - A review of current documents that describe transport support and consolidate them into a single NDIS Transport Guideline which includes Reasonable and Necessary Support, Operational Guidelines, Interface with Transport, Transport for Children, Recreational Support, Participant Transport Fact Sheet and the Price List;
 - Review and update the participant fact sheet and ensure that participants understand their obligations to pay for transport; and
 - Encouraging providers and participants to make transport support provision explicit in their service agreements.
- Ensure transport funding reflects individual needs, with flexibility of funding levels. A wider range of funding levels is needed, with scope for exceptions as required. Local circumstances, including in rural and remote locations, should be taken into account. Planners need guidance on how to apply transport funding criteria consistently.
- Promote independent travel. Local area coordinators should help develop and promote cost effective transport options and inform participants and planners about available options. These could include community transport or accessible public transport. Alternatively, several participants, and non-participants, might combine transport expenses such as in group activities. Planners need guidance on how to invest in building independent travel capacity and how to complement or enhance strong informal networks.
- Encourage market development so that participants can choose transport offered by providers as a viable and effective option that is cheaper than a taxi. Funding is required for market development and innovation with existing transport assets so that they can meet new demands. Existing transport assets could be used to offer some coordinated and group transport options where this is appropriate. Rural areas in particular will benefit from a local response that coordinates transport across service sectors and community groups. However, this requires new business models that address health and safety and licensing issues, including in relation to taxi regulation.

- Research should be funded to explore local responses to transport in NDIS and the impact NDIS transport support has on activating choice and market development options. This could be funded through the Community Inclusion and Capacity Development grants. NDS WA would like to see a coordinated transport pilot in a trial site to test different models, drawing on local knowledge and resources.
- Ensure plans allow for worker travel time in short shifts. Plans should contain the supports that participants require. If the subtraction of 20 minutes from an hour of support to cover worker travel leaves the participant without sufficient support, the plan should include an additional hour.

Improving Access to Taxi Services for People with Disability

An ongoing and critical concern with respect to the Transport Standards is taxi services provided to people with disability in Western Australia. Accessible taxis are a component of the Western Australian public transport system that is subject to the Disability Standards for Accessible Public Transport 2002.

On the basis of the performance standards data available people with disability using the Multi-Purpose Taxi (MPT) service wait significantly longer for a taxi, and experience lower reliability rates than people using a conventional taxi service, particularly during peak periods and late hours. Reports outlining the reasons for these propose a range of reasons, including the limited number of MPTs in Perth and the abandonment of jobs to drive passengers who use wheelchairs in favour of conventional work, where viability is considered higher by drivers.

In addition to availability, the standard of customer service and driver training has been raised as a significant issue by stakeholders at a public forum in 2012 and a survey of taxi users in 2013.

Availability of accessible taxis has been highlighted in previous NDS WA Pre-Budget Submissions as a major issue in terms of access to transport for people with disability. There is a continuing and critical need for a renewed commitment to ensuring a reliable, accessible and respectful taxi service for people with disability in Western Australia.

The Department of Transport's Green Paper for On-demand Transport (Green Paper) released in July 2015 acknowledges that the on-demand transport industry has a very important role to play in meeting the transport needs of a broad range of people, including people with disability.⁶⁷ The ability to access public transport, including on-demand transport, is essential for people with special needs to help them to be part of the community, attend work and travel to appointments.

The Green Paper indicates that the Department of Transport has been committed to improving transport services provided to taxi patrons travelling in wheelchairs or mobility scooters. However, with more than 110 multi-purpose taxis (MPTs) operating within the Perth Taxi Control Area and less than 40 MPT vehicles operating in regional Western Australia, the standard of service is still well below conventional taxi service levels.

On average, only 60 per cent of MPT service requests are delivered within the target wait times compared with 91 per cent for conventional taxi services.⁶⁸

A 2013 submission by the Western Australian Department of Transport to the Australian Department of Infrastructure and Transport on the 2012 Review of the Transport Standards, highlighted that there is still an issue with the availability of accessible taxis (MPTs).⁶⁹ Although it reports that the size of the MPT fleet has increased from 83 in 2007 to 110 MPTs in 2013, the growth in the number of MPT vehicles has not matched that of standard non-MPT vehicles. The Department of Transport is exploring options to meet demand for wheelchair accessible transport services outside of the taxi industry.

NDS members continue to provide anecdotal evidence that people with disability are often left for long periods in conditions that are hot, cold and wet, or in the dark at night. In some cases they are not collected at all and miss significant appointments. In addition, the conviction in August 2014 of a Perth taxi driver who sexually abused five passengers with a disability highlights the need for the Department of Transport to review transport services for people with disability. The transport arrangements for all people with disability need to be safe and secure.

NDS WA has highlighted to the State Government that there is concern that there has been little progress in making more accessible taxis available in Perth over the past 12 months and this remains a critical issue for people with disability. As a result of this lack of progress and the taxi industry's frequent failures, people with disability have lost confidence in the industry's ability to provide them with a level of service in any way comparable to that received by the rest of the population.

The Wheelchair Accessible Taxi Service Workshop conducted by the Taxi Industry Board (not currently convened) in August 2012 also highlighted significant stakeholder concerns with accessibility to taxi services for people with a disability. The workshop identified service improvements were required including:

1. Prompt pick up and guaranteed service;
2. Better driver training and respect for people with disability by drivers;
3. Universal access and more accessible taxis;
4. A better booking system;
5. Improved communication between the taxi industry and a people with disability;
6. Greater rewards for drivers for providing good service to people with disability;
7. An improved subsidy scheme;
8. A dedicated wheelchair service; and
9. The same service benchmarks for people with disability as for standard taxi services.

NDS WA reiterates its support for the recommendations from the Wheelchair Accessible Taxi Service Workshop, with a focus on a reliable, accessible and respectful taxi service

for people with disability and calls for adequate funding from the State Government to implement the recommendations.

The Department of Transport must continue to review taxi transport services for people with disability ensuring that transport arrangements are safe and secure. The Department should work with the taxi industry and other key stakeholders to ensure the level of service provided to people with disability is at least as good as that provided to the rest of the population in terms of response times, customer service and availability of accessible taxis. Specific recommendations are outlined below.

As a long term strategy the Department should develop a strategic taxi fleet plan that progressively aims to increase the number of universally accessible vehicles as a proportion of the total Western Australian taxi fleet, working toward a fleet that is universally able to accommodate all Western Australians by 2020 and ensuring there is a 24-hour, seven day a week taxi service available for people with disability. For the short-term, strategies need to be implemented that increase the number of universally accessible vehicles including (MPTs on the road through strategies that diversify the taxi fleet to meet the level of consumer demand. For example, not requiring all MPTs to carry two wheelchairs, even though most are able to do so.

Driver incentives need to also be provided for transport services for people with disability through appropriate fare structures, increasing the level of fare subsidisation for waiting times and a remuneration mechanism that provides timely payment of fares to drivers. Implementation of a driver recruitment and training program that is based around standards of service, attraction and recognition of good service and ensuring the safety of people with disability is critical. These measures should be supported by the implementation of a code of service and service standard benchmarks including annual reporting to Parliament on whether these standards were attained.

Positive Changes to Coordination of Multi-purpose Taxi Dispatch Services

A number of policy initiatives have endeavoured to improve MPT services, including increasing subsidies by paying drivers to carry wheelchair passengers and vehicle modification grants. More recently, the emphasis has been on reviewing the role and operational scope of MPT Coordinators (the taxi dispatch service providers with responsibility for coordinating MPT vehicles), initiating alternative wheelchair accessible vehicle trials, and engaging with disability service organisations to consider opportunities for other sectors to deliver accessible services.

A significant challenge in considering broader transport options for wheelchair patrons is the allocated space requirements for accessible taxis which are defined by the Transport Standards. The Australian Standards differ from those in other countries such as the United Kingdom. This is particularly true with reference to the allocated space or 'travel cube' defined in the Transport Standards, which is significantly greater than in other jurisdictions. For this reason, vehicle manufacturers such as the London Taxi Company (TX4 taxi) and Mercedes (Vito taxi) have been building taxi vehicles that comply with disability access

requirements in higher volume markets, but fall short of the Australian Standards. The DoT's current London Taxi Trial is exploring alternative transport options for wheelchair patrons.

The Department of Transport acknowledges that even with these initiatives and incentives, the waiting times for MPT services still need to be improved to ensure that a person who requires the use of an MPT can expect that the taxi will be provided and will be on time.

NDS WA Establishment of Multi-Purpose Vehicle Pilot

A number of discussions and reports have been commissioned by the Department of Transport (DoT) in recent years, indicating a potential willingness to address the issue around MOT services to people with disability. The DoT has commenced number of activities to improve MPT availability and service to people who use wheelchairs including:

- A trial regarding the suitability of London Taxi Cabs for some people, for which NDS WA has been contracted to complete a body of work and the evaluation report is currently being finalised.
- Improved coordination of MPTs to improve customer dispatch experiences.
- Further consideration of increasing the use of multi-purpose vehicles owned by Disability Service Organisations, particularly during after-hours and weekends when organisational fleet demand is low. In January 2015, NDS WA commissioned Ernst Young to complete an MPT dispatch cost benefit analysis project that included feasibility model regarding not for profit vehicle utilisation. While the analysis indicated strong potential for such a model, there are a number of factors to be further considered to establish the feasibility of such a venture, including but not limited to, compliance with existing "transport for reward" regulation and availability or dispatch mechanisms.
- At a recent Ministerial Advisory Council for Disability meeting exploring the potential for not-for-profit vehicle utilisation, the DoT advised of a Taxi Industry Development Fund. It is proposed that NDS WA liaise with the DoT and apply to this fund to:
 - Develop a robust feasibility study and business model regarding the use of the multi-purpose vehicle assets and driver staff of NDS member organisations; and
 - Conduct a pilot for a pre-determined number of vehicles over 12 months.

Recommendations For Action

- 9.1 Funding to develop a comprehensive long-term Disability Transport Strategy for people with disability in Western Australia to ensure there is, as far as possible, whole of journey accessibility which enables them to effectively participate in economic and social community activity. A key component of that strategy would be to first assess the progress towards achievement of targets set out in the Transport Standards.
- 9.2 Consider the effectiveness of the Transport Standards and associated issues highlighted by NDS WA in this submission that impact on the roll out of the NDIS in WA with a view to developing and testing appropriate solutions in consultation with key stakeholders including NDS WA.
- 9.3 NDS WA calls for ongoing commitment to ensuring a reliable, accessible and respectful taxi service for people with disability in Western Australia through the development of a strategic taxi fleet plan for people with disability including to:
- Ensure the level of service provided to people with disability is at least as good as that provided to the rest of the population in terms of response times, customer service and availability of accessible taxis;
 - Consideration of progressively increasing the number of universally accessible vehicles as a proportion of the total Western Australian taxi fleet;
 - Providing incentives for drivers to provide good transport services for people with disability through appropriate fare structures, increasing the level of fare subsidisation for waiting times and a remuneration mechanism that provides timely payment of fares to drivers;
 - Implementing a driver recruitment and training program that is based around standards of service, attraction and recognition of good service and ensuring the safety of people with disability; and
 - Implementing a code of service and service standard benchmarks including annual reporting to Parliament on whether these standards were attained.
- 9.4 Through the Taxi Industry Development Fund NDS to develop a robust feasibility study and business model regarding the use of the multi-purpose vehicle assets and driver staff of NDS member organisations. It is recommended that a pilot be conducted for a pre-determined number of vehicles over 12 months.





10.

Health and Well Being

PRIORITY 10: **Improved Health and Well Being**

Summary

A key policy outcome of the National Disability Strategy is to ensure that there is commitment across Australian jurisdictions that people with disability attain the highest possible health and well being outcomes throughout their lives.

The State Government has made some progress in this area commencing in June 2011, with the establishment of the Clinical Senate which held a debate on health and disability titled Clinicians - Do you see me? The debate participants made nine recommendations for the Director General for Health to consider for endorsement. Recommendation 1, made reference to the Department of Health work with the DSC and other relevant agencies to establish a Disability Health Network.

The work of the Disability Health Network is encouraging, particularly the development of the draft Western Australian Disability Health Framework 2015-2025: improving the health care of people with disability (the Framework). This is WA Health's response to the World Health Organisation (WHO) Global Disability Action Plan 2014-2021 and the National Disability Strategy and other continuing work around case coordination, workforce education and development of hospital stay guidelines.

In the NDS WA Pre-Budget Submission 2016-17, we urge the State Government to address the priorities for all areas of the health system articulated in the Framework that will lead to improve the health outcomes of people with disability and build on current initiatives being undertaken by the Disability Health Network.

NDS WA highlights to the State Government that there is a wide range of issues related to the health of people with disability across Western Australia that require critical resolution and that there is opportunity to pilot innovative health solutions.

The Issue

Australians with severe or profound disability are extensive users of professional health services. This level of use is associated with a high prevalence of multiple long-term health conditions, and comorbidity of mental disorders and physical conditions. This analysis is based on the data from the 2007-08 National Health Survey and the 2007 National Survey of Mental Health and Wellbeing conducted by the Australian Bureau of Statistics (ABS).⁷⁰

Severe or profound disability is strongly correlated with high use of health services, even after taking into account multiple health conditions and comorbidity of mental and physical conditions. This may be partly related to the level of functional impairments that increase the likelihood of needing and seeking assistance from the health care system. Compared with people without disability, people aged 15 to 64 years with severe or profound disability were:

- 10 times more likely to have check-ups with general practitioners at least once a month (29 per cent versus 3 per cent);
- 3.5 times more likely to consult specialist doctors in the 12 months before the 2007-08 survey period (56 per cent versus 16 per cent); and
- 5 times more likely to consult both specialist doctors and other health professionals in the 12 months before the survey period (41 per cent versus 8 per cent).⁷¹

The high use of health professionals' services was particularly related to those provided by specialist doctors, occupational therapists, and social or welfare workers. When comorbidity of significant long-term health conditions was allowed for, among people aged 15 to 64 years with three or more conditions, 63 per cent of those with severe or profound disability consulted both specialist doctors and other health professionals, compared with 27 per cent of those without disability. Of people with comorbidity of mental disorders and physical conditions, 58 per cent of those with severe or profound disability consulted both specialist doctors and other professionals, compared with 26 per cent of those without disability.⁷²

Australian Institute of Health and Welfare (AIHW) data indicates a bleak picture of the health status of people with disability.

The proportion of those aged 15 to 64 years reporting poor or fair health among people with severe or profound disability was 46 per cent, compared to 5 per cent for people without disability, and the proportion of people with mental illness was 48 per cent compared to 6 per cent for people without disability. Furthermore, people with disability have significantly higher rates of obesity, cardiovascular disease, diabetes, osteoporosis, and arthritis. People with disability also have significantly higher rates of smoking.⁷³

For these reasons, NDS WA highlights to the State Government that there is a wide range of critical issues related to the health of people with disability across Western Australia that require resolution.

Key areas are:

- The need to enhance our understanding of the health status of people with disability and implement better data monitoring system.
- The need to ensure better access to, and responsiveness from, the health care system for people with disability.
- International, national and local research has consistently identified inequitable health outcomes for people with disability. They are significantly more likely to live with complex health conditions, miss regular health screenings, have poorly managed chronic conditions and not be targeted by health promotion campaigns.
- People with disability also face a range of systemic barriers to accessing health care services.
- A further significant issue is the lack of reliable data systems to measure and report the current situation and to monitor future changes.
- Significant deficiencies in the knowledge, skill and experience of medical practitioners when providing health care to people with disability have been identified as a common problem internationally and in Australia. Research indicates that minimal clinical training on the care and treatment of people with disability is provided to medical students.
- Inequitable health outcomes for people with disability are unacceptable. However, health surveillance and data monitoring systems are currently poor, and there are serious capacity gaps in health care systems to respond to the needs of people with disability.

What the Research Says About the Health of People With Disability

In 2012, it was estimated that 18.5 per cent of the Australian population had a disability. This number is projected to continue increasing due to the ageing population and increases in chronic health conditions, among other causes.⁷⁴

People with disability have the same general healthcare needs as everyone else, and therefore need access to mainstream healthcare services as well as specialist care when required. There is also a need for a focus on addressing health conditions which are more likely to impact on the health of people with disability, particularly where it may require specialist care.

In 2007-08, almost half (46 per cent) of people aged 15 to 64 with severe or profound disability reported poor or fair health compared with 5 per cent for those without disability.⁷⁵

Despite this, people with disabilities continue to encounter a range of barriers when they attempt to access health care including prohibitive costs, limited availability of services, physical barriers and inadequate skills and knowledge of health workers.⁷⁶

Figure 8: Disability Health in Australia (15-64 years) – Comparative Prevalence Rates for Some Health-Related Conditions⁷⁷

Health condition/behaviour	Severe/profound disability	Typical adult population
Long-term conditions:		
Diabetes	23%	7%
Arthritis	14%	6%
Osteoporosis	43%	7%
Mental health problems	48% (particularly with intellectual disability)	6%
Childhood onset of mental health issues	14%	7%
Obesity	69%	58%
Low exercise	43%	31%
Daily smoking	31%	18%
Suicidal ideation	42% and 18% attempted	13.3% and 3.2% attempted *

* Age range is 16-64 years ³¹

For example:

- Women with mobility difficulties are often unable to access breast and cervical cancer screening because examination tables are not height adjustable and mammography equipment only accommodates women who are able to stand.
- People with disability were more than twice as likely to report finding healthcare provider skills inadequate to meet their needs, four times more likely to report being treated badly, and nearly three times more likely to report being denied care.
- Furthermore, as life span increases, so too does the incidence of disease patterns of the general population such as cancer and coronary heart disease, yet health promotion and prevention activities seldom target people with disability. For example:
 - People with intellectual impairments and diabetes are less likely to have their weight checked.
 - Adolescents and adults with disability are more likely to be excluded from sex education programs.
 - There is also a lack of health promotion material in an accessible format, particularly for people with an intellectual disability.

Western Australian Disability Health Context

There is clear evidence that adults with disability have relatively poor access to health interventions and health promotion programs. Compared to the non-disabled population in Western Australia, adults with disability have a significantly higher incidence of long-term health conditions and higher use of health services, including hospitalisation.⁷⁷ These inequities reinforce the importance of the United Nations Convention on the Rights of Persons with Disabilities.⁷⁸

A significant issue is the number of general practitioner-type presentations to hospitals. There were 2.2 million general practitioner-type presentations to Western Australian public hospital emergency departments in 2013-14. On average, only 22 per cent of presentations to hospital emergency departments were admitted.⁷⁹ By increasing community understanding and support of the health care coordination of individuals with disability, it is anticipated that hospital presentations not resulting in admission will be limited.

The importance of ongoing, coordinated health care between services was also highlighted by the Australian Institute of Health and Welfare: Access to Health Services by Australians With Disability 2012 report. The report found that about 13 per cent of individuals with disability who reported a need for ongoing help or supervision with health care activities, such as taking medication, manipulating or exercising muscles or limbs, had no source of assistance.⁸⁰

At the local level the key findings of the Western Australian Study of Health and Intellectual Disability 2013 strongly support the need for the development of strategies to improve health and well being for individuals with intellectual disability.⁸¹ The findings include:

- Participants reported high rates of chronic and long-term health conditions;
- Medication use was high, as was the use of multiple medications;
- Health services usage, including mental health and hospital based services, was high;
- Many participants lived a sedentary lifestyle;
- Substance use was low in the study group when compared to the general population; and
- Generally insufficient health screening and prevention for participants.

Furthermore, feedback from a range of stakeholder consultations including Clinical Senate debate on disability and health, the Disability Health Consultative Group, Disability Health Network Executive Advisory Group and the Ministerial Advisory Council on Disability indicates that potential health outcomes and effective engagement with the hospital system can sometimes be diminished by:

- Poor communication between hospital staff, disability services organisation staff, the individual and their family or carer;
- Information provided that is not fit for purpose; and
- The lack of an appropriate representative for the individual, or the inability to identify the individual's representative, to assist the hospital to understand the needs of the individual.

Recognition of Current Disability Health Work

NDS WA welcomes the commitments made by the Australian, State and Territory Governments through the National Disability Agreement and National Disability Strategy to address health disparities between people with and without disability. There is also a commitment among Western Australian Directors General in the DSC, Mental Health Commission and Department of Health to redress health inequities for people with disability.

However, there is also recognition that this cannot be achieved through good intent in the disability services sector alone. It also requires sustained collaboration between the sector and health systems and Government departments.

NDS WA particularly welcomes the DSC initiative to implement the Count Me In program; which includes a focus on improving health outcomes for people with disability. NDS WA reiterates that collaboration between the disability and health sectors will be critical to achieving positive outcomes.

NDS WA supports the needs identified by the DSC:

- Targeted primary health care for people with disability including health promotion and health screening;
- Effective disability health data systems to influence policies and practices as well as monitor health outcomes;
- Improved access to, and responsiveness of, general practitioner services; and
- Expanding health care professionals' curriculum beyond the clinical component to include education about communication, knowledge, skills and attitudes when providing health care for people with disability that recognise it is about relationships and understanding.

The work of the Disability Health Network is also very encouraging and is strongly supported by NDS WA. The Network is a collaborative health care planning vehicle lead by the Department of Health and the DSC. It was established to help shape health care for people with disability in Western Australia.

A key piece of work being undertaken by the Disability Health Network is the development of a Western Australia Disability Health Framework 2015–2025: Improving the health care of people with disability.⁸²

This is an overarching Framework for the State that outlines priorities for all areas of the health system, the disability services sector and the community to focus their efforts towards improving the health outcomes of people with disability. In addition, there is also some work around developing a draft hospital stay guide for disability services sector organisations. This guide has been developed to assist these organisations understand the hospital system and provides a range of information, checklists and tools designed to improve the transition between settings for the person with disability.

Four priority areas have been identified through stakeholder consultations including the Clinical Senate debate on disability and health; the Disability Health Consultative Group; Disability Health Network Executive Advisory Group and the Ministerial Advisory Council on Disability. The four priority areas align with international and national areas for action.

To achieve sustainable change in a large and complex system multiple actions at multiple levels across multiple organisations and the community are required. The four priority areas align with international and national areas for action and include the following:

Western Australian Disability Health Framework 2015-25 Priority Areas⁸³

1. Understanding and recognition	2. Health and wellbeing
<p>The Framework will support action to:</p> <ul style="list-style-type: none"> • Develop or reform health and disability policy, strategies and plans to be in line with the Convention on the Rights of Persons with Disability. • Remove barriers to service delivery (including impediments to physical access, information, communication and coordination) across all healthcare programs including health promotion and other population based public health initiatives. • Improve collection of health data on disability populations, and research on disability-related health disparities and interventions. • Include people with disability in the planning, development and implementation of health services that affect them (e.g. Disability Access and Inclusion Plans, design of new infrastructure, policy review). 	<p>The Framework will support action to:</p> <ul style="list-style-type: none"> • Build on and link with existing health service and health promotion initiatives including health screening, oral care and chronic disease prevention programs. • Focus on supporting people with disability, their families and carers to develop the knowledge, confidence, skills and behaviours to achieve the best possible health. • Present health promotion, prevention strategies and healthcare information in a range of formats that is inclusive of people with disability from diverse backgrounds. • Promote timely and effective identification, diagnosis and management of co-occurring mental health conditions in people with intellectual disability (e.g. dual disability).

3. Workforce capability

The Framework will support action to improve workforce capability by:

- Integrating education on the health and human rights of people with disabilities into undergraduate and continuing education for all health workers.
- Including people with disability as providers of education and training where relevant.
- Building leadership capacity for ensuring disability-inclusive health services.
- Integrating health and wellbeing education for families and carers of people with disability.
- Integrating health and wellbeing education into support worker training.
- Supporting the increase of self-advocacy skills for people with disability to effectively address specific challenges in accessing health services.

4. Inclusive health care

The Framework will support action to facilitated approaches to overcome barriers to improve and streamline service delivery and coordination, referral and transition pathways to enable improved health outcomes. This can be achieved through:

- Support mechanisms to improve the continuum of care experienced by people with disability across the life course including: discharge planning, multidisciplinary team work, development of referral pathways and service directories.
- Transition of care including communication and information exchange, identified responsibilities and consistent processes.
- Valuing input from the person with disability, their families and carers and involving them in the decisions about their health care.
- Meeting the specific needs of people with disability in all aspects of emergency health care, including injury prevention, emergency response and management
- Effectively communicating with people with disability, including those using augmentative or alternative communication methods, their families and carers.

Other areas of work being explored by the Disability Health Network and supported by NDS WA include options for better record care case coordination across the Health sector and the development of Hospital Stay Guidelines for people with disability.⁸⁴ These initiatives aim to provide a better interface between the health and disability services sector, identify areas of future work and responsibility.

In particular, NDS WA welcomes the Disability Health Network's draft Hospital Stay Guideline for Hospitals and Disability Service Organisations which was released in July 2015 for stakeholder consultation. The Disability Health Network has identified that the interaction and engagement of both individuals with disability and DSOs with the hospital system is varied and there is an opportunity to improve the overall experience for all parties. The disability services sector is made up of individuals with disability, their families and carers who may be supported by a diverse range of DSOs. Support to individuals is provided through a range of community based options including independent living, in-home support and group home accommodation, currently, the disability services sector does not have a mandated clinical governance framework and consequently responding to and supporting the health needs of individual varies based on:

- Their individual health needs;
- Their capacity to make informed decisions about the management of their own health requirements;
- Their personal living arrangement;
- The identification, recognition and involvement of the family and/ or carer;
- The capacity of the DSO; and
- The skills of the DSO staff.

This Guideline is one strategy to address the health disparities for individuals with disability in priority areas. It provides an opportunity for DSOs and the hospital system to collaborate in the development of a clinical governance framework that supports the health needs of individuals.

It is the responsibility of DSOs to translate the information contained within the Guideline to enhance their current health related policies and practices. Likewise it is the responsibility of the hospital system to translate the information contained in this Guideline to improve their services to individuals.

Priority Actions

NDS WA supports priorities articulated in the Western Australia Disability Health Framework 2015–2025 and recommends to Government that the immediate funding focus should be in three critical areas.

- Improving Health System Capability - All health service providers (including hospitals, general practices, specialist services, allied health, dental health, mental health, population health programs and ambulance services) have the capabilities to meet the needs of people with disability.

- Promoting More Effective Prevention and Early Intervention - Timely, comprehensive and effective prevention and early intervention health services for people with disability.
- Health Promotion for People With Intellectual Disability - Extensive research has shown that people with disability, and in particular with intellectual disability, face numerous health challenges.

ACTION 1: Supporting and Resourcing the work of the Disability Health Network

NDS WA is strongly supportive of the work of the Disability Health Network and in particular the Western Australia Disability Health Framework 2015–2025 and the draft Hospital Stay Guideline for Hospitals and Disability Service Organisations.

Funding to support priority projects with the Framework should be provided by the State Government in the 2016-17 State Budget. In addition, it is recommended that the Framework and Guidelines be considered in the context of the rollout of the NDIS across Western Australia.

ACTION 2: Strategy to Improve Service Integration

NDS WA advocates that Government should consider developing a strategy that focusses on improving service integration between the Department of Health and the DSC for people with disabilities, especially those who have complex disabilities. This should include a range of health support interventions e.g. nursing support, better utilising disability sector capacity to reduce unnecessary hospitalisation of people with disabilities, and coordinated service planning.

ACTION 3: Annual Health Checks for People with Disability

NDS WA advocates that as a priority the State Government should invest in annual health check program for people with disability.

The Comprehensive Health Assessment Program has been trialled extensively in Queensland over the past decade. Health service providers (usually general practitioners) work with people with disability, families and carers to conduct regular health checks. There is strong empirical evidence of its efficacy in identifying undiagnosed health conditions.

Such programs could be introduced more broadly in the disability services sector through the DSC as the NDIS is rolled out across Western Australia. One option is to roll out the program using non-Government organisations; with NDS WA as a potential partner. It is crucial that sufficient monitoring and evaluation is also embedded in a research component for quality assurance purposes.

It is also important that a research component is included in the health check program as monitoring and evaluation will be critical in the implementation process.

NDS WA commends the State Government's existing investment in this area through the DSC who has provided total funding of \$500,000 to two disability organisations, Nulsen

Disability Services and Brightwater Care Group to deliver better clinical health outcomes and develop health lifestyle choices for people with disability. The learnings from this pilot project should be used to develop a comprehensive health check strategy for people with disability across Western Australia. In addition it is recommended that as a starting platform that funding be provided to roll out a health check program as part of the transition to NDIS roll out.

ACTION 4: Invest in a range of health promotion and intervention programs

There is limited support and targeted preventative health care strategies and programs in Western Australia for people with intellectual disability.

The Centre for Research into Disability and Society at Curtin University is investigating the health of adults with intellectual disability in relation to health status, health service usage, and targeted health interventions.

The research establishes a much needed baseline and is developing strategies for the design, implementation and evaluation of interventions to address targeted inequalities. The study is guided by an expert reference group comprising national and international experts as well as local Government and non-Government stakeholders. In early 2013, 228 adults with intellectual disability and or a support person such as a carer or family member were interviewed.

Findings suggest that only 15 per cent of participants experienced no long-term health conditions. Common health problems included constipation, allergies and skin rashes, epilepsy, oral health, and mental illness. The study identified general practitioners as seminal in addressing research participants' health issues. The study, combined with the Health and Intellectual Disability Symposium and Seminar Series in August 2013 hosted by the Curtin University School of Occupational Therapy and Social Work, together with the DSC and Mental Health Commission identified poor health literacy across the sector.

NDS WA urges the State Government to fund initiatives that develop the health literacy of people with disability, their families and carers, to raise awareness of the health issues these people face.

There are negligible existing health promotion programs for people with disability in Western Australia. Investment in health promotion and health intervention programs is critical to address the many health challenges they face and will lead to substantial savings to Government as preventative and primary health care is cost-effective compared to secondary and tertiary care.

These programs could be implemented through the non-Government sector and make use of ready-made health promotion programs developed in the United States around obesity, diabetes, and oral health. NDS WA supports its collaboration with Curtin University, DSC, Mental Health Commission and the Department of Health in the design and coordination of such programs.

People with Disability and Mental Health

NDS WA welcomes the development of the Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015-2025 (the Plan) developed by the Mental Health Commission, the Drug and Alcohol Office and the Department of Health.⁸⁵

The Plan sets an ambitious agenda that has a general focus on enhanced prevention programs and strategies and early intervention. A core principle of the Plan is to seek collaboration from participants in the mental health space - all levels of Government, the private and not for profit sectors, consumers, and families needing to work together to achieve to achieve better outcomes for individuals, families and the broader community.

NDS WA is in supportive of the Plan's intent and direction. However, the Plan should be enhanced by a more specific focus on the needs of all people with disability and in particular those with high and complex support needs. NDS WA is also supportive of using evidence-based modelling to shape the quantity, location and types of services required for people with disability.

It is strongly recommended that the Plan be supported by an extensive funding implementation plan that is innovative and focuses on service integration across relevant sectors. This approach aligns with the work being explored by the Partnership Forum around self-directed services whereby individual needs drive the service response. This is also the direction of the National Disability Insurance Scheme where funds will be allocated to individuals rather than through contracts with service providers. This practice is already occurring in disability services in Western Australia.

NDS WA also highlights to Government that the integrated approach to service delivery is consistent and supports several of the work streams identified in the Partnership Forum Future Directions report. In particular, they reinforce proposed work around investigating mechanisms to foster and support the provision of wrap around services and investigating alternative mechanisms to foster local collaboration outside of funding mechanisms and contracts.

Barriers to information sharing are often used as an argument against integration. While privacy issues make it difficult, information can be shared. For example, where multiple agencies are working with one individual, it is possible to have a single care plan with information shared with the individual's consent. Other barriers to integration include competitive tendering and contracting and Government Budget processes. Organisations have to compete against each other to receive funding, which makes it more difficult to collaborate at the local or individual level.

Consideration should also be given to exploring options enabling central coordination of funding. This includes a need to explore funding models such as a single care plan for individuals with funding contributed from a range of different services. This would mean that relevant programs or agencies might provide funding for specific needs, but this funding would be managed at an individual level – particularly for people with complex needs receiving support from a range of different agencies. This could also occur at a community level, with funds coming from a range of sources but managed collectively in a local community.

Recommendations For Action

- 10.1 Support and resource the work of the Disability Health Network including finalise the WA Disability Health Framework 2015–2025 and prioritise areas for immediate action. In addition, it is recommended that the Framework and draft Hospital Stay Guideline for Hospitals and Disability Service Organisations be considered in the context of the rollout of the NDIS across Western Australia.
- 10.2 Government should consider developing a strategy that focusses on improving service integration between the Department of Health and the DSC for people with disability, especially those who have complex disabilities. This should include a range of health support interventions e.g. nursing support, better utilising disability sector capacity to reduce unnecessary hospitalisation of people with disability, and coordinated service planning.
- 10.3 Invest in a range of health promotion and intervention programs to raise awareness of and redress the health inequities of people with disability including; a targeted health promotion campaign and annual health checks for people with disability. Initial funding should be provided to trial these programs.
- 10.4 It is strongly recommended that the Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015-2025 (the Plan) developed by the Mental Health Commission, the Drug and Alcohol Office and the Department of Health be further enhanced by a more specific focus on the needs of all people with disability and in particular those with high and complex support needs. The Plan needs to be supported by an extensive funding implementation plan that is innovative and focuses on service integration across relevant sectors.

Key Disability Facts

About the Western Australian Disability Services Sector

NDS WA is the peak disability services sector organisation in Western Australia, with over 100 organisational members providing services in metropolitan, regional and remote areas across the State. Collectively, these members provide services to thousands of West Australians with a disability and their families and carers. The reach of NDS WA is further extended through its administration of access and inclusion programs such as ACROD Parking, Companion Card and the Community Living and Participation Grants.

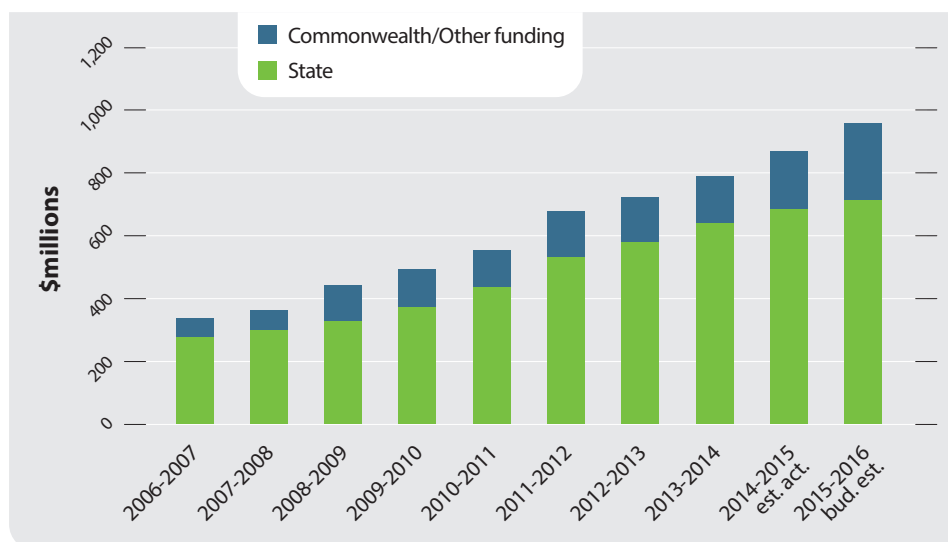
One in five Western Australians live with a disability. Western Australia has a population of approximately 2.59 million people⁸⁶. The proportion of the total population with a disability is 16.3 per cent or 389,800 persons – 30% with a severe or profound disability, 49% with a moderate disability, 37% with a schooling or employment restriction and 87% with a specific limitation or restriction.⁸⁷

Those reporting Aboriginal people have severe or profound disability rates more than twice those of non-Aboriginal people.⁸⁸ There are also an estimated 236,200 carers (almost 10 per cent of the total population) who provide support to people with disability in Western Australia.⁸⁹

The disability sector workforce is a major sub-group of the largest Western Australian industry workforce. In 2013 in Western Australia 141,400 people were employed in health care and social assistance (10.1 per cent of the total workforce), compared to 130,900 people employed in the retail, construction (146,700) and mining (106,700) industries.⁹⁰ The health care and social assistance sector is complex and diverse, and supports people in many areas of their lives. Helping to meet and support the holistic needs of a person with disability and their family and carers includes many areas of activity such as personal care, accommodation, employment, education, therapy, sport, recreation, and advocacy.

Spending on people with disability. The total budget of the Disability Services Commission for 2015–2016 increased from \$866.1 to \$963.7 million – an increase of 9.1 per cent including contributions from the Australian Government and other income sources. The West Australian Government will provide \$717 million to support people with disability, their families and carers. Since 2008–2009 the state disability budget has increased by 122 per cent.⁹¹

In total, funding for disability services will increase by \$98 million or 11.3% in 2015-16 to meet the growing community need for disability services in Western Australia. This will accommodate increasing demand for support and services. This is in addition to funding for the trial sites for the NDIS, \$39.8 million over 2014-15 and 2016-17.⁹²

Figure 9: State and Commonwealth funding 2006–2007 to 2015–2016 ⁹³

The proportion of services delivered by the disability sector organisations in comparison to the government sector has increased steadily over the last 10 years.

Figure 10: Disability Expenditure: DSC and disability services sector organisations 2009–2010 to 2013–2014 ⁹⁴

The chart illustrates the distribution of Commission expenditure for the last five years.

In 2013–2014, 71.5 per cent of funding was allocated for services provided by non-government organisations. This was an increase of 2.3 per cent on the previous year.

Some Key Facts

Dashboard Disability Indicators

WA DISABILITY POPULATION ⁹⁵

Population with disability	389,800
People with profound or severe core activity limitation	118,400
Number of people accessing a disability support service	23,412
Number of carers	236,200

Less than 22 per cent of people with profound or severe core activity limitation receive funding

DISABILITY SERVICES COMMISSION SERVICE USER PROFILE ⁹⁶

Total	24,017
Female	10,173
Male	13,831
Intellectual disability	34.6%
Autism	20%
Physical	27%
Self care support	84%
Communication	76%
Mobility	62%
Most of the Commission's clients require daily supports	

Most of the Commission's clients require daily supports

PARTICIPATION IN VOCATIONAL EDUCATION AND TRAINING (VET) IN WA ⁹⁷

Proportion of people with disability in VET	
WA	4.8 per cent
Australia	6.8 per cent

Western Australia remains as the jurisdiction with the lowest proportion of people with disability undertaking VET declining from 4.9% in 2012 to 4.8% in 2013

PARTICIPATION IN THE LABOUR FORCE (WA)

Unemployment rate ⁹⁸	– with disability	7.2 per cent
	– no disability	4.5 per cent
Participation rate ⁹⁹	– with disability	56.5 per cent
	– no disability	85.0 per cent

People with disability are under-represented in Western Australia's workforce with a higher unemployment rate and lower participation rate

PARTICIPATION IN PUBLIC TRANSPORT ¹⁰⁰

Proportion of people with disability with specific limitations or restrictions who have difficulty in using public transport

WA	32.1 per cent (98,600 people)
Australia	38.5 per cent

HEALTH STATUS ¹⁰¹

Reporting poor / fair health

People with disability aged 15–64 years	46.0 per cent
General population aged 15–64 years	5.0 per cent

People with disability experience poorer health status than the general population. For example, people aged under 65 years with severe or profound disability have a higher prevalence of long-term health conditions than people without disability and 48 per cent of people with severe or profound disability have mental health problems ¹⁰²

APPENDIX 1: NDS WA STATE COMMITTEE

The State Committee meets bi-monthly and includes the following members:

State Committee Chairperson and Members

Tony Vis Chairperson	Activ Foundation Inc <i>Chief Executive Officer</i>
Joan McKenna Kerr Vice Chairperson	Autism Association WA <i>Chief Executive Officer</i>
Gordon Trewern Vice Chairperson	Nulsen Disability Services <i>Chief Executive Officer</i>
Sue Ash	UnitingCare West <i>Chief Executive Officer</i>
Matt Burrows	Therapy Focus <i>Chief Executive Officer</i>
Fiona Beermier	Intework <i>Chief Executive Officer</i>
Justine Colyer	Rise <i>Chief Executive Officer</i>
Robert Holmes	Enable South West <i>Chief Executive Officer</i>
Debbie Karasinski	Senses Australia <i>Chief Executive Officer</i>
Marina Re	identitywa <i>Chief Executive Officer</i>
Marcus Stafford	MS Society of WA <i>Chief Executive Officer</i>
Michael Tait	Rocky Bay Inc <i>Chief Executive Officer</i>

APPENDIX 2: NDS WA MEMBER PRIORITIES

2015-16 Pre-Budget Submission NDS Member Priorities

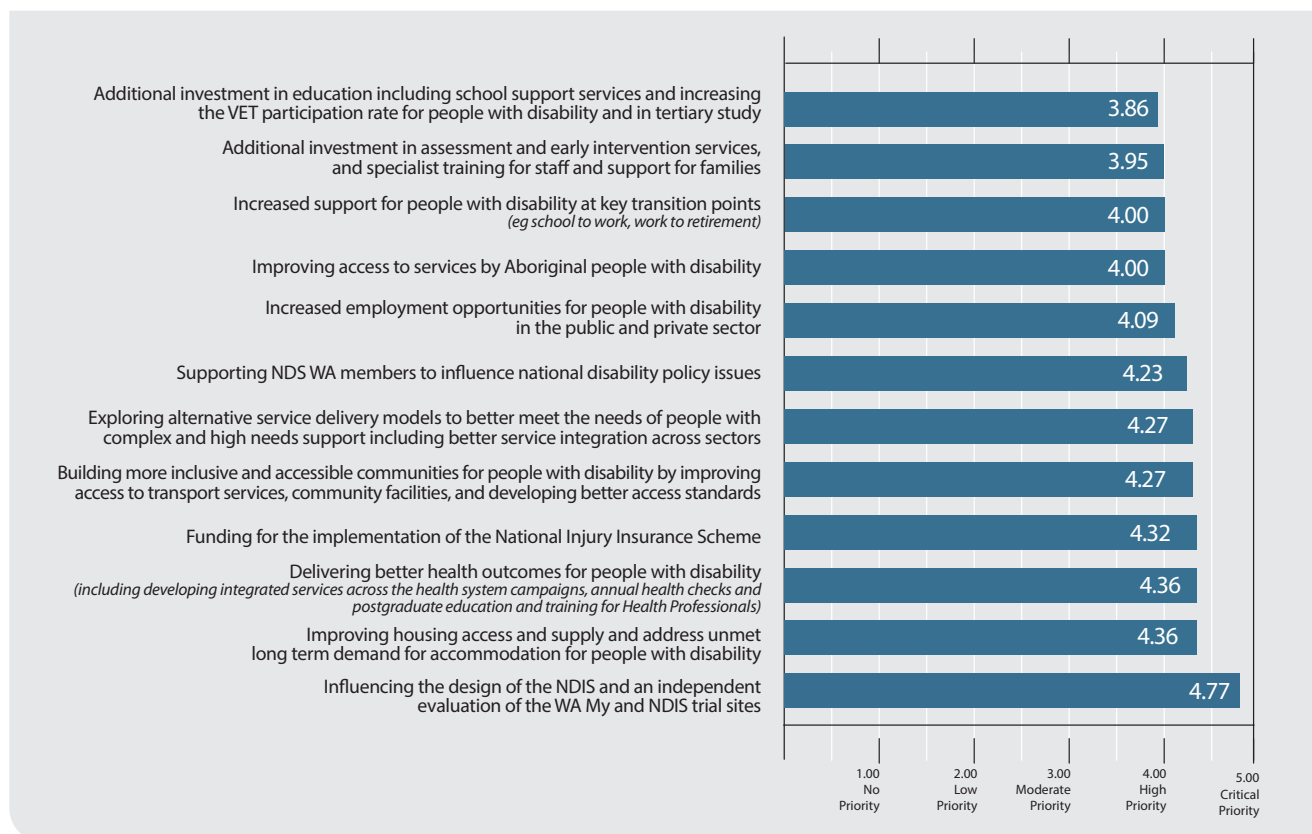
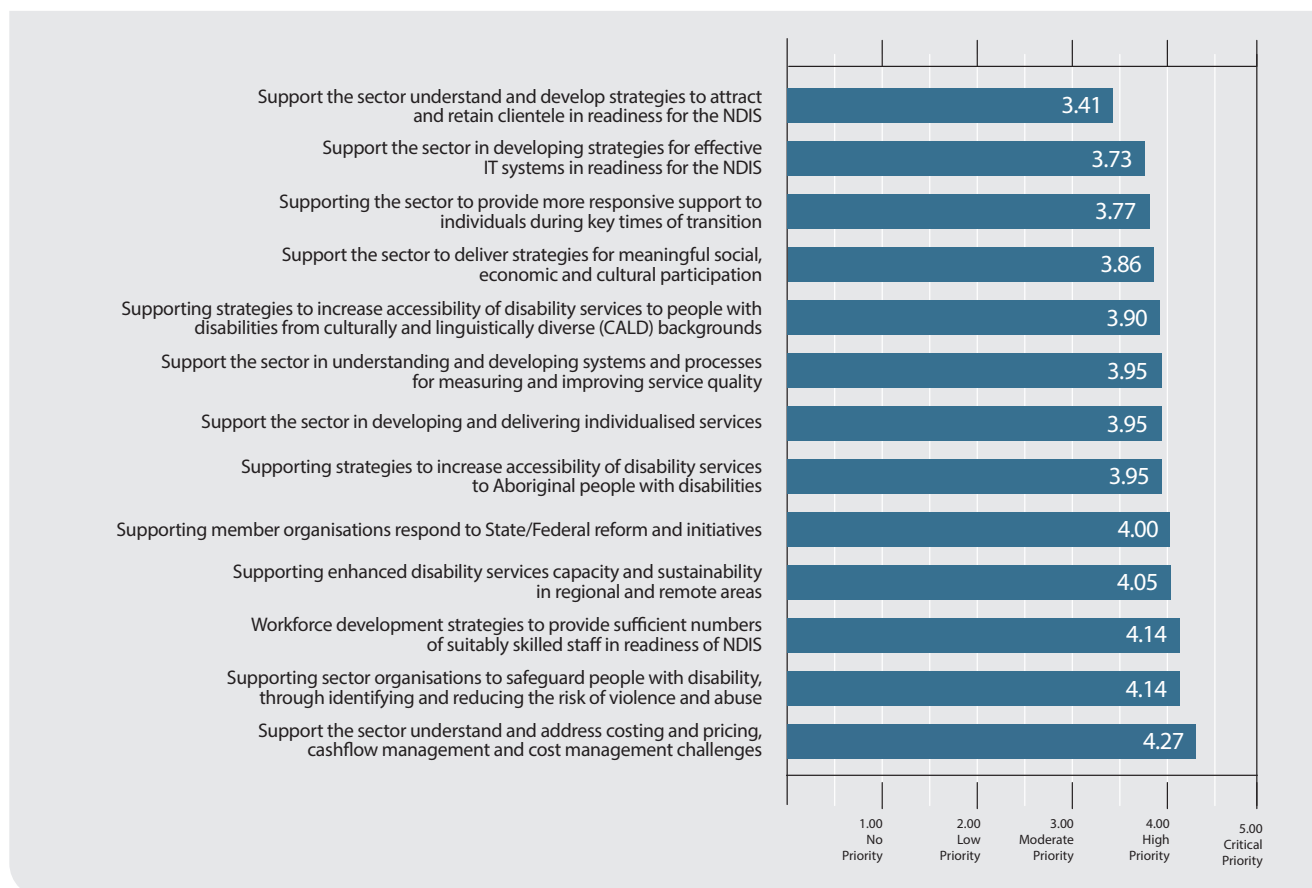
The 2015-16 NDS WA Pre-Budget Submission focuses on funding recommendations that deliver better policy outcomes for people with disability in priority areas of the National Disability Strategy.

The highest priority initiatives in these policy outcome areas has been included in this year's submission.

Consideration was also given to the priorities highlighted through the NDS WA Annual Member Survey when framing these recommendations. These are summarised below and shown in more detail at Appendix 1. The 2015-16 NDS WA Pre-Budget Submission was informed by the deliberations of the NDS WA Pre-Budget Steering Group and NDS WA Sub Committees.

NDS WA Member Priorities

Policy and Advocacy	Sector Support and Development
1. Influencing the design of the NDIS was rated as the highest priority	1. Supporting the sector to understand and develop costing and pricing, cash flow management and enhanced cost management challenges
2. Improving housing access and supply	2. Supporting sector organisations to understand safeguarding people with disability
3. Delivering better health outcomes	3. Workforce development strategies to provide sufficient numbers of suitably skilled staff in readiness for NDIS
4. Funding the implementation of the National Injury Insurance Scheme	4. Supporting enhanced disability services capacity in regional and remote areas
5. Building more inclusive and accessible communities models	5. Supporting member organisations respond to State/Federal reform and initiatives
6. Exploring alternative service delivery	6. Supporting strategies to increase accessibility of disability services to Aboriginal people with a disability
7. Supporting NDS members to influence national disability policy issues	7. Support the sector in developing and delivering individualised services

Figure 11: NDS Members Policy and Advocacy Priorities 2015-16 ¹⁰³**Figure 12: NDS Members Sector Support and Development Priorities 2015-16** ¹⁰⁴

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