WA Pre-Budget Submission 2018-19

# Foreword

On behalf of NDS members in WA, we are pleased to present our 2019-20 Pre-Budget Submission (PBS). It highlights priorities and outlines required actions essential to improving the lives of people with disability and their families. NDS is committed to driving initiatives that address areas of critical need, ensure an efficient and effective service system, and support a strong, thriving and innovative sector. The ultimate goal is to ensure people with disability and their families have improved life outcomes.

NDS is widely respected for its robust policy development, analysis, and representation of the sector and the interests of people with disability. Successive State Governments have acknowledged and valued our strong advocacy on critical issues such as National Disability Insurance Scheme (NDIS) transition funding, the Catastrophic Motor Vehicle Insurance Scheme, the Changing Places network, public infrastructure access (including Optus Perth Stadium and Elizabeth Quay) and significant increases in funding for specialist disability services since 2008.

The annual PBS is the policy centrepiece for state-level disability advocacy developed in consultation with NDS members and sector stakeholders. It highlights priorities and outlines required actions essential to improving the lives of people with disability and their families. Policy papers were developed and distributed to NDS members and disability sector stakeholders in WA including NDS State Committee and Sub-Committee members. We remain committed to driving initiatives that address areas of critical need and ensure an efficient and effective service system with a strong, thriving and innovative sector in Western Australia.

Much has happened since our last PBS, most notably, the State Government’s decision to operate under the Commonwealth administered NDIS. The disability sector in WA is adjusting to the implications of operating under the national scheme and what it means for organisations both operationally and financially. The immediate target to transfer 8,700 people with disability into the scheme by the end of 2018 is ambitious and the speed of transition must not compromise service quality or availability.

This year’s PBS highlights the many challenges facing the disability sector in a rapidly changing environment – particularly around NDIS policy and implementation, including pricing and outstanding scheme design issues. In particular, our submission highlights the very important role of market stewardship in relation to the NDIS and its implication for services to people with disability and the organisations that support them.

The promise of the NDIS is one of the greatest visions of our time - but it will only succeed through a good operational plan. It is critical that the Operational Plan between the NDIA, Western Australia and the Commonwealth for Transition to Full Implementation of the NDIS (the Operational Plan), released in August 2018, is carefully monitored and responsive to emerging issues.

State Government funding for transition announced in May 2018 is a welcome down payment on the future of the sector, especially with the workforce expected to double in size over the next three years. The WA Disability Services Sector Industry Plan, (the Industry Plan), projects that by the end of 2020, the disability sector has the potential to generate total economic impact of $2.7B including an extra 10,000 direct and indirect full-time jobs in WA. This aligns with the Government’s focus on creating jobs and delivering quality services.

Continued investment is essential to ensure that people with disability in WA are not disadvantaged and that the NDIS transition in WA will be as seamless as possible for them and their families and the many local organisations that support them. People who are eligible for NDIS supports must not be disadvantaged by any future arrangements during transition to full scheme NDIS in Western Australia, including those in rural and remote locations for whom delivery of NDIS supports may pose particular challenges. This is clearly a condition of the Heads of Agreement between the Commonwealth and Western Australian Governments on the NDIS (the Bilateral

Agreement).

Our 2019-20 PBS also highlights the need to develop an overarching vision for disability in WA through a State Disability Plan that details the requirements to build and progressively transition to the NDIS in WA and also to meet the state’s obligations to implement the National Disability Strategy. While the State Government has signalled its intention for a State Disability plan, the depth, breadth and funding of the plan is still being determined.

Most importantly, it is critical to ensure there is strong and seamless interface with mainstream disability services and there is no dilution of state effort in delivering good community inclusion outcomes for people both outside and inside the Scheme. Our goal is for an inclusive Western Australia which supports all people with disability to live satisfying everyday lives as well as NDIS participants maximising their choice and control for NDIS supports.

Thank you to the hundreds of people including people with disability, families, the people who support them, specialist disability service providers and non-government organisations who helped shape this submission through their commentary, advice and advocacy of issues to NDS and its members.

**Julia Waylen,** State Manager

**Joan McKenna Kerr,** NDS President and NDS WA Chairperson

# Priorities 2019-20

Our Focus:

1. A State Disability Plan – Inclusive WA
2. Build the NDIS in WA – Make it work
3. Deliver the National Disability Strategy – Stewardship and vision

## Priority 1: A State Disability Plan – Inclusive WA

Key Deliverables:

1. Develop a State Disability Plan
2. Fund and implement the plan

**Why we need it**

This PBS includes a detailed proposal for State Government consideration to guide the development of a State Disability Plan. NDS has been advocating for a State Disability Plan for some time and welcomes the opportunity to partner with the State Government to develop the plan in consultation with people with disability, their families and the sector. “Inclusive WA”, is our proposal for a plan for the more than 410,000 people with disability living in our vast state. This plan will be fundamental to support the vision for an Inclusive WA.

The plan has two main objectives:

1. Enable a smooth and successful NDIS transition; and
2. Support people with disability to live satisfying everyday lives through effective implementation of the National Disability Strategy.

It will bring together the requirements to build and progressively transition to the NDIS in WA and also to meet the state’s obligations to implement the National Disability Strategy. It is critical to ensure there is strong and seamless interface with mainstream disability services and there is no dilution of state effort in delivering good community inclusion outcomes for all people with disability.

The plan needs to set out the ongoing role of the State Government in promoting the inclusion of West Australians with disability, including major government activities, how to work in partnership with businesses and communities, and how to achieve results. Inclusive WA also articulates the steps that need to be taken to build a sustainable quality disability sector. The public and private sectors, our workplaces, schools and community need to be empowered to ensure this occurs. These changes will require sustained effort and investment in order to position WA as a national leader in realising the social, economic and civic aspirations of people with disability.

NDS presents our proposed State Disability Plan to the WA State Government for consideration. It will provide a great opportunity to maximise the benefits that the NDIS will bring and ensure that all people with disability can participate in everyday life.

An infographic highlighting the components of the State Disability Plan – which will build the NDIS in WA (make it work) and deliver the National Disability Strategy.

The components listed in the infographic too make the NDIS work in WA  include: fortifying choice and control, strong government stewardship, sustainable disability supports, strong service support models, face to face decision making with people, a high performing quality workforce, quality support, minimise transfer and transition disruption, seamless mainstream interface, and strengthened safeguards.

The infographic of the State Disability Plan also highlights that to deliver the National Disability Strategy requires actions around providing safe and secure places to live, learning and skills, better health and wellbeing, creating job opportunities, inclusive and accessible communities and justice, rights and quality, safe supports.

| **Inclusive WA – State Disability Plan 2018-20 Overview** | | | | | |
| --- | --- | --- | --- | --- | --- |
| **Vision:** An inclusive Western Australia, which supports people with disability to live satisfying everyday lives. | | | | | |
| **Principle:** NDIS: West Australian’s have maximum choice and control over services that support their everyday lives. | | | | | |
| **Six policy pillars** | | | | | |
| Strong government market stewardship | Fortify choice and control for people with disability | Build a quality workforce to strengthen safeguards and improve services | Build sustainable supports | Minimise service disruption / detrimental outcomes from NDIS transfer and transition process | Strong and seamless interface mainstream services that support people with disability |
| **An individual lived experience** | | | | | |
| I can access good and reliable services at the right price | I can get the supports I need and can talk to people locally about my supports | I have access to good, reliable and skilled support workers when I need them and am safe | The supports I need are available  and affordable | My support services are not being disrupted by the NDIS transfer or transition | I am able to access all mainstream disability services  outside the NDIS |
| **Priorities** | | | | | |
| * Retain a State Disability Minister, Statutory Authority and agency focus * Monitor implementation of the NDIS Operational Plan * Monitor, prevent and mitigate market failure * Support a proactive local stewardship role * Fully fund the NDIS transition including full implementation of the WA Disability Services Industry Plan (Industry Plan) and commit to update the Plan * Build tailored service responses not a one size fits all approach * Commonwealth support and funding for NDIS sector transition * Ensure the continuity of supports for people with disability who have been receiving State Government disability services | * Embed co-design mechanisms throughout NDIS systems and processes * Embed local decision making and close NDIS face-to-face relationships by supporting a local NDIS governance structure | * Fund the Industry Plan (all workforce recommendations)   + Identify, monitor and respond to workforce issues in partnership with the sector   + Disability Workforce Promotion Campaign   + Establish a Skills passport project   + Invest in a subsidised training fund for VET and industry-determined skillsets   + Review the education and training system in the context of the NDIS   + Development of a Portable Training Business Case   + Develop a Portable Training Business Case * Increase workforce requirements and awareness of quality and safeguarding issues * Develop nine tailored regional and local workforce plans | * Ensure a sustainable WA specific NDIS pricing framework for supports and SDA * Ensure NDIA Pricing Review is: * WA evidenced- based, supports regional service delivery and complex disability * Support a revised SDA to better connect supply with demand * State Government leadership and stewardship with NDIS housing, including development of a SDA market profile database and information about range of housing options available * Incentivising NDIS service support models that are innovative and evidence-based * Minimise cost shifting to the disability sector | * Address and monitor priority transition issues * Provide adequate transitional funding support * Monitor and review the transfer/transition roll out timeframe * Support the implementation of a local governance structure | * Ensure WA receives adequate ILC funding * Guarantee no dilution of effort in mainstream services |

| **Inclusive WA – State Disability Plan 2018-20 Overview** | | | | | |
| --- | --- | --- | --- | --- | --- |
| **Vision:** An inclusive Western Australia, which supports people with disability to live satisfying everyday lives. | | | | | |
| **Principle:** The National Disability Strategy is funded to ensure economic and social participation of all West Australians with disability. | | | | | |
| **Six policy pillars** | | | | | |
| Inclusive communities | Safe and secure places to live | Better health and wellbeing | Learning and skills | Creating jobs | Justice and protection |
| **An individual lived experience** | | | | | |
| I am part of my community | I have a secure home | I can access good health services | I am confident in my education training and skills | I am able to find a job suited to my skills and interests | I feel safe and get a fair go |
| **Priorities** | | | | | |
| * Stronger monitoring and enforcement of ACROD * ACROD and Companion Card Digital Project * Accessible Public transport and integration with METRONET * Stronger building requirements * Universal design for housing and community infrastructure * Foster and develop accessible tourism market to make WA the go to destination * Fund a state-wide access for all abilities program * Extend the Kid Sport and Silver Sport programs * Implement accessible and secret voting for People with Disability | * Implement a Disability Housing Strategy:   + Promote universal design and provide incentives   + Implement disability affordable housing strategies   + Provide government owned land for new disability housing   + Support private sector to include accessible housing in new developments   + Utilise the METRONET/   + Hub to increase supply, accessibility and affordability of housing   + Encourage community housing projects   + Better target the First Home Owners Grant   + Rebate or Remove property transfer duties for people with disability   + Expand the WA Assisted Rental Pathways Pilot   + Better utilise the Key Start Country Housing Loan for regional communities | * Health checks for people with disability * Connected and better trained health services * Health promotion and information program * Good dental care scheme * Access to mental health services for people with co-morbidity * Improved handover processes to support people moving between health and disability sectors * Education strategy for medical and allied health professionals on NDIS and individualised services | * Fund inclusive education program   + School compliance audit for National Disability Education Standards 2020   + Review all new schools to be fully accessible   + Establish the Building Disability Improvement Fund (all schools to meet student disability needs by 2022)   + Establish joint planning mechanisms for schools, families and Department of Education   + Education materials in alternative formats accessible to all students with disability   + Invest in Teacher Training to reduce restrictive practice in schools   + Establish complaints mechanism reportable to Parliament * Inclusive training and skills development program – fund:   + Social Assistance and Allied Health Workforce Strategy to inform the work of State Training Board   + Pilot and trial VET Centre of Excellence for people with disability   + Improve VET traineeship pathways | * Government leadership   + Develop Economic and Employment Participation Strategy   + State Public Sector Employment Strategy - mandated targets reportable to Parliament * Inclusive employment   + Investment in customised employment models (the NDS Employment Ticket to Work Program and projectable)   + Support BuyAbility - Government purchase of goods and services from Supported Employment Enterprises   + Continue employer payroll concessions   + Invest in social impact demonstration projects to increase employment opportunities and pathways   + Advocate for NDIS funding in individual plans for employment supports | * Develop and fund state-wide Disability Justice Plan * Expand Child FIRST program and rename to include people with disability * Continue to invest in Quality and Safeguard requirements * Investment - Zero Tolerance program * Fund Disability Advocacy * Maintain Disability Justice Centres |

## Priority 2: Build the NDIS – Make it Work

Key Deliverables:

1. Strong and robust government market stewardship
2. Fortify choice and control for people with disability
3. Build a high performing workforce that delivers quality support services, strengthens safeguards and support people to live an everyday life
4. Build sustainable supports
5. Ensure NDIS transfer and transition minimises service disruption and avoids detrimental outcomes for people with disability and their families
6. Strong and seamless NDIS interface with mainstream services that support people with disability

**Making the NDIS Work – Build a mature system in WA**

Making the NDIS in WA work is a key priority for this year’s PBS. Across Australia, the scheme is being rapidly implemented – growing in spurts, sometimes in an uncoordinated manner with huge risks being taken. The WA transition to the NDIS is even more challenging given the immediate target to transfer and transition more than 8,700 people with disability into the scheme by the end of 2018. This ambitious and dual challenge of transfer and transition is compounded by geographical issues associated with regional, remote and very remote communities in a state as vast as Western Australia.

NDS has identified the top ten fixes needed for the NDIS to work well in WA. The State Government as the co-signatory (and owner) of the Bilateral Agreement has an ongoing and high-level responsibility to ensure the transition is seamless. The State Government needs to carefully monitor NDIS implementation and support people with disability, their families and the sector to navigate this significant reform.

1. **Strong and robust government market stewardship**

The largest risk to the NDIS is market failure that would see people eligible for the scheme unable to access high quality and safe specialist disability services when they are needed. As a quasi-market created and funded by government to fulfil a social purpose, the NDIS is a public sector market. People with disability, however, are not a market. There is a real risk that the reliance on market economics in a quasi-market system will negatively impact on people with disability. The premise of an NDIS market is naive and service providers do not have control of the levers needed to ensure appropriate service outcomes or individual goals. Around the world the role and responsibility of government in overseeing public sector markets remains ambiguous and there is no single public sector market in human services that is entirely self-regulating and capable of meeting all demand.

The State Government cannot completely withdraw from its strong stewardship role with respect to the NDIS and must ensure the price paid to providers sustains the supply of quality services at acceptable levels for participants. Strong stewardship can provide critical early intervention to remedy thin markets and prevent market failure, particularly in regional areas.

The NDIS is very different from a traditional market where competition between providers determines price. It is a regulated market with the supply of services determined by set prices. Effective market stewardship can address the growing gap between demand and supply and improve the sector’s ability to thrive and innovate to deliver the social outcomes intended in this new quasi-market. The State Government must accept its role as the market steward of disability services in Western Australia and ensure the NDIA works with the local disability sector to address the key issues of sector investment, quality services, thin markets, empowering consumers, and identifying and mitigating risks.

NDS proposes the NDIA and the State Government agree on a set of market stewardship principles to shape the implementation of the NDIS in WA. For example:

* The NDIA understands supply and demand
* The NDIA and/or State Government intervenes early to prevent market failure
* Prices should sustain supply at acceptable levels
* Quality of supports are acceptable
* People with disability are well informed about the availability of supports

To enable the implementation of these principles in policy and practice requires commitment by the State Government to retain a dedicated Minister for Disability Services and a well-resourced state agency accountable to Western Australian citizens with disability to ensure the careful monitoring of the full implementation of the NDIS as well as the implementation of a reinvigorated National Disability Strategy. The State Government must also ensure any review of the Disability Services Act 1993 explores options to retain and reinvigorate existing consultative structures such as the Ministerial Advisory Council on Disability (MACD) and Disability Services Board.

1. **Renew funding commitments**

The NDIS is expected to cost $22B annually when the scheme reaches full maturity in 2022. The State Government and the WA disability sector need to be vigilant that funding is not diluted, and more importantly, the allocation is reflective of the real cost of full scheme implementation.

1. **Sustainable pricing**

The greatest threat to the effective implementation of the NDIS in WA is that the pricing framework continues to be inadequate and does not reflect local conditions. To build a sustainable workforce, provide continuity of supports and high-quality support, organisations need realistic prices for services. The cost of providing services under the NDIS framework at NDIS prices represents a 20 per cent reduction in individualised services in real terms.

The gap between cost and price is the greatest impediment to any expansion of services. As a result of historical funding arrangements, many organisations do not have the reserves to invest in the systems, processes and training required to significantly expand services. Most (about 80 per cent) of specialist disability service providers have a turnover of $6M or less. There is significant risk of market contraction. High cost, complex supports will become the responsibility of the state, as a last resort provider of safety net services.

1. **Fix the pathways and portal**

WA needs to continue to advocate for better systems. Fixing the pathways to the NDIA portal remains a priority. Delays in participant plan approvals continue to cause significant stress while the many fixes to the portal have been slow. NDIA planning processes for transfers and transitions lack consistency across planners and locations. There needs to be significantly greater investment in pre and post planning. There are significant changes to first and second year plans and services can be discontinued whilst people await their new plan, leaving them without a service or support.

1. **Get transport on track**

Access to adequate and reliable transport needs urgent attention. If participants have limited access to transport options they cannot participate in the community, go to work or access some types of services. Planners must ask how participants intend to get to a destination and provide funding if needed. NDIS and government subsidies must be realistically framed around the way a person lives and the supports they need, including the true hourly cost of appropriate transport or modified vehicles and consideration of local geography and distance.

1. **Make employment a priority**

Employment supports under the NDIS are very low even though employment participation is critical to improving the economic and social participation of participants.

Anyone capable of entering the workforce should have provision for employment supports in their NDIS funding package. Only one in five people in the NDIS have been assisted by the scheme to find suitable work. For young people, the rate of support is even lower at just 5.4 per cent of those aged 15-19 years and one per cent of people aged 20-24 years. Currently only those who specifically request employment support may get it, whereas an employment first approach is more suitable in an insurance model. While the NDIS school leaver initiative is welcome, it should be applied before Year 12 and to after school work.

1. **Revise Specialist Disability Accommodation (SDA)**

The SDA pricing framework is far too complex with a large array of pricing matrices for many housing development types. It is very difficult to connect the supply and demand for housing for those eligible participants and accessibility is poorly defined. The SDA funding approach also provides incentives for co-housing of people based on disability type rather than individual needs, preferences or choice.

Greater certainty of SDA prices beyond 2021 is needed. Prospective developers have indicated their reluctance to invest in SDA as they require greater surety around the term of investment. The SDA initiative requires a minimum 20-year lifecycle of funding and consistent participant application, if financiers and developers are to invest in this new market with sustainable risk. The time limited 10-year funding period for SDA is inhibiting Community Housing Provider and property developer investment in affordable SDA housing stock due to the lack of surety around participant residents retaining funding over longer periods. An additional consideration is the insufficient geographic funding weighting being applied in SDA pricing. SDA properties will not attract prospective developers because of the higher risk profile, resulting in limited interest in investing to build more affordable SDA homes for people with disability, as well as, a lack of more creative housing arrangements.

1. **Invest in quality and safeguarding**

There must be investment in quality and safeguarding and in particular, the new National NDIS Quality and Safeguarding system, including provision for induction and training costs, and building the capability of organisations to foster cultures that protect and respect human rights.

The cost of the implementation of the new system should not be passed on to disability organisations. In other states, the cost of compliance is already driving organisations not to register as a service provider, leaving individuals subject to unregistered and unmonitored services. In WA, the State Government centrally funded and supported quality evaluations. In its role as market steward, the State Government should provide scalable grants for organisations to meet the cost of quality audits and compliance.

1. **Resolve demarcation disputes – better integration with mainstream services**

NDS urges the State and Commonwealth Governments to seek agreements and mechanisms that ensure all government agencies and service systems work in tandem. The implementation of the NDIS heightens the risk of demarcation disputes and cost shifting. This is linked to rising concerns about the potential for dilution of state effort and inadequate funding in mainstream services to support people with disability who are not part of the NDIS.

1. **Improve engagement and communication**

The implementation of the NDIS to date has suffered from poor communication and lack of engagement with participants and providers, particularly around the co-design of the scheme. Historically, the WA disability sector and people with disability and their families have had strong and enduring relationships with the WA State Government and relevant agencies that informed the design of the WA system. The implementation of the NDIS in WA must be supported by a locally responsive governance structure that can act quickly to resolve critical issues and have greater local decision making capacity, otherwise it may jeopardise eligible people receiving adequate, quality and timely supports. It is particularly important that the Operational Plan between the NDIA, Western Australia and the Commonwealth for transition to full implementation of the NDIS is communicated to the disability sector and that there is extensive engagement with the sector as it is progressively implemented over the term of the Bilateral Agreement.

## Actions

### Strong and robust government market stewardship

1. **Retain a State Government Disability Minister and agency**
   * Retain a dedicated Minister for Disability Services and a well-resourced state agency to ensure careful monitoring, accountability and implementation of the NDIS and a reinvigorated National Disability Strategy.
   * Any review of the Disability Services Act 1993 must retain a Statutory Authority and explore options to retain and reinvigorate existing consultative structures such as the MACD and Disability Services Board.
   * The harmonisation of State and Commonwealth legislation as part of the implementation of the Commonwealth administered NDIS in WA must also include appropriate representation from the disability sector. The Operational Plan indicates that where legislation or regulation is inconsistent with the NDIS Act 2013, WA and the Commonwealth will develop and implement remediation strategies in conjunction with the NDIA during the transition period. This must also include consultation and engagement with people with disability and their families and the disability sector.
2. **Monitor implementation of the NDIS transition Operational Plan between the WA State Government, NDIA, and Commonwealth**
   * Monitor and adjust the Operational Plan between the NDIA, WA and the Commonwealth to address provider sustainability issues and market failure to ensure people with disability are not disadvantaged.
   * State Government must be proactive in ensuring effective implementation of the Plan and accountable for the delivery of smooth transition and transfer outcomes.
   * Monitor transfer and transition schedules and publish quarterly progress reports.
   * Communicate the Operational Plan to the sector and engage the sector on phasing arrangements and other activities on an ongoing basis.
3. **Monitor, prevent and mitigate market failure and plan for the future NDIS market**
   * The State Government to work with NDIA on market stewardship on pricing, sector investment, quality, thin markets, empowering consumers and mitigating risks.
   * Agree with the NDIA to set Market Stewardship Principles that will shape and guide the implementation of the NDIS in WA.
   * Provide funding for a market analysis tool and intervention framework to support the collection, analysis and release of disability sector market data including demographic and workforce trends and benchmarking. The NDS Industry Plan can provide an evidence base for investment decisions at a state/regional WA level.
   * Establish and fund a WA Disability Research Network to support the National Disability Strategy and NDIS interface in WA.
   * Develop and pilot customised emergency and crisis responses for thin markets particularly in regional and remote WA. The Operational Plan only requires the NDIA to establish a participant pathway pilot for complex support needs that will be delivered in a metropolitan site in WA. This pilot should be replicated for regional and remote areas as well.
   * Ensure that the proposed development and implementation of the working arrangements for participants with specific or complex support requirements and the Critical Services Incident Response (CSIR) escalation framework (by December 2018) are informed by the disability sector and people with disability.
4. **Proactive regional stewardship role**
   * Establish a State-Commonwealth taskforce to consider the needs of regional NDIS participants, monitor the gaps and identify solutions.
5. **Fully fund NDIS transition over the term of the Bilateral Agreement, including commitment to update and implement the WA Disability Services Industry Plan**
   * Provide funding in the budget forward estimates for disability transition for the duration of the Bilateral Agreement to 2023 to manage change to ensure a smooth NDIS transition, build workforce capacity and deliver high quality services in all parts of the state.
   * Additional funding should be allocated to implement strategic initiatives of the WA Disability Services Industry Plan 2017. This includes:

* NDIS Transition 2018-20 - $1.1M
* Local and Regional Worker Pool - $669,000
* NDS Learning and Development 2018-19 - $220,000
* Building a Quality/Skilled Workforce - $880,000
* Regional Workforce Plans - $315,000
* NDIS Data and Analysis Project - $250,000
* Local NDIS Workforce Coordinators - $1.5M
* Service Delivery Innovation Grants - $500,000
* Subsidised VET Training 2018-20 - $250,000
* Local Workforce and Jobs Promotion - $300,000
* Seamless Mainstream Interface - $250,000
* Update the Industry Plan to gather current data and inform sector investment - $150,000.

1. **Build tailored service responses, not a one-size-fits-all approach, particularly for regional and remote WA**
   * Support the development of WA regional pricing frameworks to provide people with local choices where they live.
   * For each region in WA, support the development of NDIS implementation plans and customised workforce plans.
   * Identify which services or geographical locations are not suited to the introduction of increased competition based on case-by-case assessment of local conditions and requirements.
   * Guarantee disability services are delivered to thin markets. Safety net services and emergency supports need to be considered particularly in remote regions of WA where NDIS may accelerate potential market failure.
   * Consider choice and control in the context of small regional/remote markets for services often with a single provider (or no provider).
2. **Commonwealth support and funding for NDIS sector transition**
   * Lobby the Commonwealth for WA specific support and funding for NDIS sector transition.

#### Fortify choice and control for people with disability

1. **Embed co-design scheme mechanisms throughout NDIS systems and processes**
   * Identify and establish key collaboration points and mechanisms that provide opportunity for participants, families and sector organisations to positively influence the design of the NDIS in local settings.
2. **Embed local decision making and close face-to-face NDIS relationships by supporting a local governance structure**
   * In partnership with the Commonwealth, embed and implement a NDIS locally based governance model in WA that works within the policy frameworks of the NDIS. Participants, families and carers, and service providers must be key representatives at all levels of the structure.
   * Secure local delegated authority for NDIA WA State Manager (or equivalent) to make decisions to suit local conditions within the national framework.
   * Utilise the existing (and renewed) WA based structures such as the Disability Services Board and MACD to strengthen and inform local decision making.
   * Address the lack of experience of NDIA staff to deal with complex and challenging NDIS issues.
   * Ensure adequate transparency around the NDIS transition in WA through the development, tracking and achievement of local KPIs/performance metrics that align with NDIS goals and public reporting of achievements.
   * Provide good information about supply and demand of NDIS services to ensure people with disability understand what they can purchase in the NDIS and existing and potential suppliers have knowledge to make strategic business decisions**.**

### A capable quality workforce that delivers quality support services to people with disability and strengthens safeguards

1. **Fund the Industry Plan to meet increased demand for support services**
   * Provide funding to support workforce capacity initiatives aligned with the State Training Board Social Assistance and Allied Health Workforce Strategy Report including to:

* Identify, monitor and respond to workforce issues in partnership with the sector.
* Implement all workforce related recommendations from the Industry Plan.
* Develop and deliver planning and training resources.
* Promote the disability sector as a career of choice by funding a Disability Workforce Promotion Campaign.
* Fund a ‘Skills Passport’ project to ensure a qualified workforce, certified and accredited to meet expectations around quality and safeguarding.
* Provide subsidies for VET qualifications on disability.
* Review the education and training system in the context of the NDIS.
* Fund the development of a Portable Training Business Case.
* Invest in a subsidised training fund for VET and industry-determined skillsets.
* Increase workforce requirements and awareness of quality and safeguarding issues.

1. **Develop nine regional and local workforce plans**
   * Fund the development of regional workforce plans for each of WA’s nine development regions tailored to local conditions that identify pathways and feeders for recruitment.
   * Regional Development Commissions should play an active role in linking training, recruitment and regional job growth.
   * Include regional service providers in state training plans and consider partnership models.

### Build sustainable supports

1. **Sustainable pricing framework for supports and SDA including addressing regional pricing**
   * Ensure the NDIS pricing framework for WA is sustainable over the Bilateral Agreement period to allow disability service providers to meet the supply demands of the growing NDIS market, particularly in rural and remote areas.
   * Ensure NDIA Pricing Reviews are conducted as part of the WA transition and review current NDIS price controls and other market settings to decide whether they are appropriate for WA. Specifically, this review must consider whether they support the sustainable, efficient and quality delivery of disability supports to participants across the State.
   * The Review must:
     + Be independent and evidenced-based on the current costs of delivering disability supports in WA (especially in regional and remote and thin markets). This will include how to deliver disability supports to people with high and complex needs and those in rural and remote areas of WA.
     + Include extensive engagement with providers and other stakeholders.
     + Consider the merits of adopting a mixed/hybrid model of funding in thin markets across WA.
     + Examine whether NDIS price controls and other market settings, including the recommendations of the NDIS Independent Pricing Review, are appropriate for WA, or whether they should be modified.
     + Examine the appropriateness of the Modified Monash Model (MMM) category/classifications for WA.
   * Provide Review recommendations based on evidence, including:
     + The current costs of delivering disability services including labour costs (as reflected in Enterprise Bargaining Agreements) in WA.
     + The costs of delivering disability supports in rural and remote areas of WA including an examination of the WA Regional Price Index to provide an insight into the differences in WA regional costs.
     + Whether the existing NDIS support catalogue and price guide accommodate WA service delivery models (including innovative support options) and apply appropriate rules (e.g. allowances for provider travel).
   * The focus of the review should not be to determine whether any material differences in the costs of delivering disability supports in WA, relative to other jurisdictions, are likely to be ongoing or temporary, as it will be difficult to project this into the future. It is unlikely that WA price controls will converge to national levels particularly in rural and remote WA, given the cost of service delivery in these areas is unique to WA.
   * Ensure sufficient supports for people with complex disability, who need services over weekends and overnight or require emergency and crisis support.
   * Deliver on minimum award conditions and do not prevent employers who offer above-award conditions through pre-existing Enterprise Bargaining Agreements in place from meeting their legal obligations.
   * Ensure that the NDIA revises the SDA pricing framework to better connect the supply and demand for housing for eligible WA participants.
   * Develop a SDA market profile database to stimulate new innovative housing and investing in a housing data pool which maps out the supply and demand for housing in WA including the development of a vacancy management list. There should be a nationally consistent approach to vacancy management.
   * State Government takes a proactive leadership and stewardship role with NDIS housing to:
     + Ensure NDIS participants have access to affordable housing options, including security of tenure, access to safe and secure housing suited to individual needs.
     + Ensure adequate and appropriate information about the range of housing options available and how to access them.
     + Incentivise housing development by making surplus government land available to the private and NFP sector investment in demonstration projects to stimulate innovative ideas that can effectively respond to immediate needs.
     + Commit to an action plan to link NDIS housing demand with the State Government’s broader planning and housing strategies including a broader Disability Housing Strategy and the METRONET/HUB policies.
2. **Strong NDIS service support models that are successful, innovative and evidence-based**
   * Lobby the NDIA to develop and pilot innovative support models that in particular tackle the challenges of delivering good basic services to remote and very remote communities.
   * Support the development of individualised living options such as home sharing, host family arrangements and good neighbour approaches and ensure that the NDIA adopts processes that continue to make these available for people with disability.
3. **Minimise cost shifting to the disability sector and guarantee quality and safeguarding**
   * Ensure that compliance with the NDIS Quality and Safeguarding Framework will not impose added compliance costs for providers who will need to adapt internal systems and processes to comply with these new standards. The State Government has historically funded the cost of coordinating a quality system, the training of evaluators and scheduling of evaluation and assessment of reporting. The equivalent cost incorporated in the national system should not be passed onto service providers without adequate compensation.

### Minimise service disruption and avoid detrimental outcomes for people with disability

1. **Address and monitor priority transition issues**
   * Address transition priorities including ensuring people eligible for NDIS supports are not disadvantaged, including those in rural and remote locations. Greater choice and control for people with disability by capacity building/resourcing for local decision making at critical points in the NDIA in WA.
2. **Monitor and provide adequate funding support to facilitate a smooth transfer and transition**
   * Provide adequate funding to build workforce capacity to address the increase in demand for services.
   * Ensure disability organisations have sufficient working capital to cover the additional ongoing costs associated with NDIS transition.
   * Review the adequacy of the transition fund on a six-monthly basis until full implementation is achieved.
3. **Monitor and review the transfer/transition roll out timeframe**
   * Establish a transparent mechanism to rigorously monitor the NDIS roll out timeframe, monitored on a quarterly basis
   * Undertake a WA-specific NDIS evaluation, building on the national evaluation of the scheme released in February 2018.
4. **Support the implementation of a local governance structure**
   * Support the NDIA to implement a tailored implementation governance structure to embed local decision making and smooth transition.
   * The local NDIS should be further supported by a series of regional coordinators and work within existing WA-based structures such as the Disability Services Board and Ministerial Advisory Council on Disability.

### Strong and seamless interface with mainstream disability services

1. **Ensure WA receives adequate Information, Linkages and Capacity Building (ILC) funding**
   * Ensure WA is provided with sufficient ILC funding into the future including an ILC funding round for regional and remote parts of the state. WA has missed out on the funding from the ILC Remote Grant Round, a piloted direct non-competitive $9M grant round for remote areas to provide place-based and culturally specific information, resources and supports for people with disability living in remote communities.
   * Establish a grant funding round that pilots and tests different approaches in rural and remote areas.
2. **Guarantee no dilution of effort in mainstream services**
   * Guarantee State Government funding for mainstream services for people with disability. Ensure programs for people with disability not eligible for NDIS are not diluted as an unintended consequence of NDIS implementation.
   * Commit to the development, implementation and resourcing of an Inclusive WA State Disability Plan to ensure full access and inclusion for people with disability in economic, cultural, social, civil and political life. This will require a strong interface between mainstream agencies and the NDIS, as well as meeting the state’s obligations under the National Disability Strategy.
   * Support the development of a revised National Disability Strategy from 2020 that clearly articulates state and federal responsibilities and is supported by an adequate funding instrument (such as the National Disability Agreement) and a reporting structure.

An infographic highlighting the components of the proposed State Disability Plan. The purpose of the Plan is twofold,  to build the NDIS in WA (make it work) and deliver better outcomes for people with disability from the National Disability Strategy, focusing on the six key policy areas articulated in the Strategy.

The State Disability Plan asks the State Government to develop focussed actions to make the NDIS work in WA. This should include:
fortifying choice and control, providing strong government stewardship, building sustainable disability supports and strong service support models, face to face decision making with people, a high performing quality workforce, quality support, minimise transfer and transition disruption, seamless mainstream interface, and strengthened safeguards.

The infographic of the State Disability Plan also highlights that to deliver the National Disability Strategy requires actions around delivering better outcomes in the six policy areas of the Strategy including providing safe and secure places to live, more opportunity for learning and skills, better health and wellbeing, creating job opportunities and inclusive and accessible communities as well as justice, rights and quality, safe supports.

## Priority 3: Deliver the National Disability Strategy

**Six Pillars of inclusion: priorities and actions**

Key Deliverables:

1. Inclusive and accessible communities
2. Safe and secure places to live
3. Better health and wellbeing
4. Learning and skills
5. Creating job opportunities
6. Justice and protection; high quality, safe supports

The introduction of the NDIS means that now more than ever, the State Government must remain committed to its obligations under the National Disability Strategy.  
  
The National Disability Strategy articulates some key areas of policy action: inclusive and accessible communities; rights protection; justice and legislation; economic security; personal and community support; learning and skills; and health and wellbeing. The NDIS is the principal response to the personal and community support policy area and approximately 10 per cent of people with disability will be eligible for NDIS supports in WA. The vast majority of people with disability rely on other areas of the strategy to create inclusive and accessible communities, however, action in these areas has been limited.  
  
The Strategy is supported by all levels of Government but the implementation of it has been poor. The ownership of the Strategy is too narrow and it has no accountable outcomes.  
  
With NDIS roll out underway in WA, NDS believes it is critical now more than ever that the State Government focuses on investing in mainstream services that deliver better outcomes for people with disability in WA across all six policy areas of the National Disability Strategy. To achieve this there needs to be clear articulation of the long-term role and responsibilities of state and federal governments in disability and funding to support a reinvigorated National Disability Strategy beyond 2020. The Strategy must form part of a State Disability Plan, Inclusive WA, to ensure mainstream support and services are accessible for all people with disability.  
  
Customer-focused and outcomes-based service design and delivery are critical to the delivery of the broad outcomes of the National Disability Strategy. They form part of the principles that underpin the NDIS and remain compelling. Both the Strategy and the Scheme require action by the State Government and innovative thinking to deliver better service outcomes for people with disability in our state. This is also important to the work of the McGowan’s Government’s Service Priority Review and Machinery of Government changes on how to best deliver human services to Western Australians in the context of the fiscal challenges faced by the state.  
  
The State Government needs to continue to provide leadership in this specialised area of human services through a dedicated State Minister responsible for disability in WA and a state agency with a Statutory Authority and mandate for economic/social inclusion.  
  
The National Disability Agreement (NDA) and the National Disability Strategy are both being reviewed. NDS is of the view that whatever replaces the NDA and National Disability Strategy must deliver more.  
  
Progress on many of the policy actions in the National Disability Strategy cannot be tracked because they are not underpinned by indicators. Currently, there are only three performance benchmarks in the NDA. Some other indicators, such as the workforce participation and employment rates of people with disability and carers, are tracked too infrequently (every three years). Public awareness of the dashboard reporting is low, even though the latest report shows that two of three benchmark indicators are ‘not on track’ and the other is trending in the wrong direction.  
  
NDS supports keeping a NDA and using it as an instrument to implement the National Disability Strategy. It must however be supported by funding for implementation and a robust accountability framework that drives performance and utilises measures that provide various levels of indicators. It must also articulate the roles and responsibilities of state governments including mainstream services and specialist disability services.

The NDA should also give coherence and focus to the collection and use of disability data.

**Examples of possible indicators**

* Employment of people with disability in public sector agencies
* Proportion of public transport that is accessible
* Setting and monitoring of targets for the implementation of the Disability Education Standards
* Proportion of new housing built to various levels of accessibility
* Proportion of people with disability satisfied with their hospital stay compared with the general population
* Proportion of people with severe or profound disability reporting poor or fair health outcomes compared with the general population
* Proportion of the prison population with intellectual disability or cognitive impairment

A revised National Disability Strategy should also guard against the potential for dilution of State Government effort as a result of the implementation of the NDIS. NDS notes the Productivity Commission Study Report (released October 2017) that highlights that the interface between the NDIS and other disability and mainstream services is critical for participant outcomes and the financial sustainability of the scheme.  
  
Significant ongoing investment is required by mainstream agencies to include people with disability in initiatives that support people to access social, cultural, religious, recreational and sporting life in the community. In WA, there should be equity of access to services irrespective of where people live. While the NDIS may provide new opportunities for people living in and around WA regional centres, it may not have any impact in remote or very remote areas that are several hours away from the nearest regional centre. In these communities, services are not only thin, they may be non-existent.  
  
The combined effects of distance, density and geography create significant barriers to any improvement under the NDIS and the National Disability Strategy. There are distinctly WA features that mean regional strategies in other locations may not be readily transferable. These include very long distances between communities, diverse language groups, competition for staff from other sectors including the mining sector, and significant regional difference in the availability of other services or infrastructure. The requirements for the Kimberley compared to the Wheatbelt or South West regions of WA, for example, are markedly different.  
  
In WA, specialist disability service organisations are often the first port of call for local officers working in State Government departments. The interface between health, disability and the mental health system is particularly unclear and a local response with clear actions, lines of responsibility and accountability is critical to improve outcomes and meet the obligations of the National Disability Strategy.  
  
Actions

### National Disability Agreement and Strategy

1. **Reinvigorated strategy supported by a funding and implementation plan with greater accountability for the delivery of outcomes**

**National Disability Agreement**

* + A new National Disability Agreement (NDA) from 2020 to provide the overarching framework for the substantial reforms underway to disability policies and services and the diverse and changing roles and responsibilities of governments.
  + It must outline how the NDIS relates to the broader services and supports available to people with disability.
  + It should include appropriately funded and accountable advocacy services.
  + Articulate how access will be improved to mainstream services. Too many people with disability fare poorly when accessing mainstream services (such as when they go to hospital, interact with the justice system or participate in education).
  + Fund relevant research and data collection about people with disability to track the wellbeing and social and economic participation of people with disability beyond the NDIS.
  + Include publication of NDIS customer data as a requirement of the NDA. An Australian Disability Report should incorporate data on the performance of the NDIS.

**National Disability Strategy**

* Reinvigorated commitment to the National Disability Strategy beyond 2020 via the Council of Australian Governments Disability Reform Council.
* The Strategy must be supported by a comprehensive implementation and investment plan to ensure mainstream support and services in WA are accessible for all people.
* Ownership and funding of the Strategy must be clarified and the various levels of Government must be held accountable for achieving outcomes.
* Governments must set clearer boundaries around ‘who supplies what’ to people with disability. In particular, the interface between the NDIS and other disability/mainstream services is critical for achieving better outcomes.
* There should be no dilution of State Government effort in mainstream services. Some disability supports are not being provided because of unclear or contested boundaries about the responsibilities of the different levels of government.
* The future framework needs to provide for the more active involvement of people with disability in decision-making.
* There is scope for improved information gathering and dissemination of Strategy successes beyond the disability sector into the broader community and into mainstream agencies.

#### Inclusive and accessible communities

1. **ACROD and Companion Card**
   * Impose stronger fines and loss of driver demerit points for misuse of the Australian Disability Parking Scheme and amend ACROD legislation to allow prosecution for misuse of private property bays.
   * Extend Road Traffic Code 2000 parking concessions to State Government property so ACROD permit holders have extra time to complete business.
   * Fund ‘Smart Permit’ for WA Australian Disability Parking Permits and additional support for the WA Companion Card program to promote the right of people with disability to fair ticketing in digital ticketing systems.
2. **Accessible Public Transport**
   * Stronger commitment to ‘whole journey’ transport, beyond standards, to create door-to-door accessible public transport journeys.
   * Faster implementation (and modernisation) of the Transport Standards.
   * METRONET and other transport strategies must all be inclusive for people with physical, sensory and other disabilities.
   * Ensure transport supports for people with disability in the NDIS are retained to enable community access and employment.
   * Retain and extend state-run transport schemes for NDIS participants to include alternative services such as Uber, not-for-profit and ride sharing options.
   * Invest in pilot programs that better utilise existing transport assets such as provider fleets.
3. **Stronger building requirements**
   * Support inclusion of Changing Places in Disability Access to Premise Standards.
   * Encourage new commercial and retail properties to go beyond minimum standards for access including a Changing Places facility.
   * Ensure all new major retail developments of scale are required to include a Changing Places facility.
   * Advocate strengthening the National Construction Code to improve the design of new housing developments including apartments and domestic building regulations in the interests of people with disability.
   * Require all electorate offices to be accessible.
4. **Universal design and accessible housing and community infrastructure**
   * Coordinate a whole-of-government policy incorporating universal design principles and immediately apply universal design approaches across key infrastructure programs and projects including considerations by Infrastructure WA.
   * Government planning processes engage people with disability and incorporate universal design principles.
   * Promote universal design standards in new housing developments including those associated with the State Government’s METRONET/HUB.
   * Develop a universal star rating system for new residential developments.
   * Require all new housing developments to include a set and mandated target for inclusive housing for people with disability.
5. **Accessible tourism**
   * Encourage development of accessible tourism industry.
   * Maintain high levels of accessible information and way-finding in all tourism precincts.
   * Provide funding for the development and implementation of an Accessible Tourism Toolkit to make WA a destination of choice for travellers with disability.
6. **Accessible sport and recreation**
   * Provide funding through a statewide all-abilities program for sport and recreation activities that is also a ‘first port of call’ service.
   * Extend the KidSport and SilverSport programs, administered by the Department of Local Government, Sport and Cultural Industries, to people with disability.
7. **Accessible voting**
   * Implement accessible and secret voting for people with disability across all electorates.

### Safe and secure places to live

1. **Affordable, accessible and available housing**
   * Develop and implement a whole-of-government Disability Housing Strategy for people with disability. This should include:
     + A commitment and action plan to address broader issues around housing access and affordability, which is long overdue and includes a strategic growth plan developed in partnership with community and private housing and the disability sector. This is critical as the demand for accessible and affordable housing by people with disability will significantly increase with the NDIS roll out - however, 94 per cent of NDIS participants will be ineligible for SDA funding are reliant on social housing or the private sector. Similarly people who are ineligible for the NDIS (the vast majority of people with disability) will require housing solutions. The State Government must take a proactive leadership role in ensuring that this group of people with disability have access to affordable housing options and safe and secure housing including security of tenure suited to individual needs.
     + Pursue more aggressive compliance with universal design in new housing developments by introducing mandatory inclusionary housing requirements (e.g. legislating that all new residential housing developments be required to meet minimum universal design standards for access). This could also be extended to new social housing and any refit/renovation of existing housing undertaken by the State Government.
   * Promote universal design to the building industry through a campaign.
   * Provide incentives for housing developers and facilitate new housing for people with disability through direct funding, use of Government land and planning schemes quotas as part of new developments. This should include incentivising housing development by making surplus government land available to the private and not-for-profit sector as well as investment in demonstration projects to stimulate innovative ideas that can effectively respond to immediate needs.
   * Ensure adequate and appropriate information about the range of housing options available and how to access them.
   * Facilitate collaboration between state and local governments, developers, planners, providers, disability providers, families and banks.
   * Explore alternative options for housing including piloting social impact investment and equity investment programs such as Social Impact Bonds for their efficacy in stimulating investment in good housing for
   * people with disability and community housing projects.
   * Commitment to an action plan to link housing demand for people with disability with the State Government’s broader planning and housing strategies e.g. utilise the METRONET/HUB planning policies to purposefully increase the supply, accessibility and affordability of housing available to people with disability.
   * Address housing affordability cost issues including better targeting of the First Home Owners Grant, rebating or removing property transfer duties for people with disability, expanding WA Assisted Rental Pathways Pilot and better utilisation of the Key Start Country Housing Loan for regional communities.

### Better health and wellbeing

1. **Health checks including good dental care**
   * Fund annual health checks for people with significant disability (and consider the roll out using nongovernment organisations in partnership with NDS). Health checks also have the potential to increase knowledge of the health needs of people with disability among health professionals and support staff.
   * Introduce the Comprehensive Health Assessment Program or a similar initiative as the NDIS is rolled out across WA including monitoring and evaluation for quality assurance.
   * Fund annual dental health checks for people with disability.
   * Establish treatment and support initiatives for people with complex needs, including a new clinical child specialist to improve treatment of children aged up to 12 years.
   * Increase access to capital to develop long-term sustainable housing for people with disability who occupy hospital beds over the longer term due to a lack of accommodation options or are homeless e.g. establish a targeted initiative to support people who are ‘homeless’ in hospital, especially those with newly acquired disability whose living arrangements have broken down.
2. **Connected health services, better training and health promotion**
   * Provide targeted investment in health promotion initiatives for people with disability to improve understanding and access to health care and maintain good health.
   * Design and disseminate public health promotion materials and programs for people with disability, and in particular those with people with intellectual disability.
   * Increase funding for targeted prevention activities to improve health outcomes for different groups, including promoting good oral health, access to cancer screening and reproductive and sexual knowledge.
   * Develop a coordinated information platform for both health information and services for people with disability, families, carers and disability service providers.
   * Fund the Department of Health and Mental Health Commission to develop and implement a discreet program to ensure continuity and integrated supports for people experiencing (or are at risk of experiencing) multiple and interrelated conditions or factors which contribute to the need for a higher intensity of support. This includes multiple or dual diagnosis, clinical complexity, psychosocial disability, autism, significant medical or deteriorating health conditions and complex behavioural support needs that are hard to reach – in addition to having an intellectual disability. Preferred providers or panels should be nominated to provide such services. This is particularly important in thin markets and/or remote communities where there may be few or no providers.

### Learning and skills

1. **Inclusive education program**
   * Provide education materials in alternative formats that are accessible by all students with disability.
   * Increase access to tailored education services and advice for children with disability – curriculum modifications, promoting positive behaviour and how to reduce restrictive interventions.
   * Ensure specialist advice and joint planning between schools, teachers, families and government.
   * Conduct an audit of all schools to ensure compliance with the National Disability Education Standards 2020.
   * Set a mandatory compliance target for implementation of the National Disability Education Standards 2020 as part of school registration.
   * Establish a specific complaints mechanism for parents with children with disability reportable to parliament.
   * Ensure funding to schools is contingent on progress made towards disability action plans.
   * Establish a school improvement fund over the forward estimates for building improvements to ensure all schools accommodate the needs of students with disability by 2022.
   * Provide funding to educate school communities about disability inclusion and benchmark inclusive education.
   * Review all policies and practices across early childhood, schools, training and TAFE settings that relate to people with disability by 2020.
2. **Inclusive training and skills development**
   * Fund a Training and Employment Research project to identify issues around low VET participation by people with disability in WA and to inform the work of the State Training Board.
   * Fund a pilot action research project to develop and trial strategies for a VET Centre of Excellence for people with disability.
   * Improve VET traineeship pathways including establishing a State Government public sector traineeship program for people with disability linked to training targets set by the State Training Board.
   * Invest in a Vocational Education and Training in Schools (VETiS) program to better align to pathways into skilled and priority occupations, including to adequately respond to the NDIS.
   * Invest in a NDIS in WA Workforce Readiness Priority Initiative Package – a comprehensive, well implemented workforce plan to minimise skills shortages and support NDIS to 2020.
   * Invest in a campaign to promote the disability workforce as the employer of choice.

### Creating jobs

1. **Government leadership**
   * Develop an economic participation and employment strategy for people with disability with the wider business community aligned to the State Government’s employment and training policies.
   * Fund the implementation of a public sector employment strategy for people with disability including government traineeships and mandated targets reported to parliament annually. NDS supports the State Government’s ‘See my abilities: An employment strategy for people with disability’ (See my abilities) initiative that provides a cohesive set of actions that will help public authorities realise good practices around attracting, recruiting, retaining and developing people with disability. The strategy requires sufficient resourcing to deliver the intended primary outcome – to increase the representation of people with disability in public sector employment over time.
   * The State Government must report progress with delivering the performance objectives adopted under ‘See my abilities’ to Parliament including:
     + Meeting or exceeding the goal of 2.3 per cent of people with disability represented in public employment;
     + Increasing the representation of people with disability at all levels within public authorities, relative to those published in the State of the WA public sector report;
     + Improving representation of people with disability employed at all levels across regional WA, relative to those published in the State of the WA public sector report; and
     + Leading and championing the employment of people with disability through the Public Sector Commission’s Advisory board.
   * Fund a research project exploring blockages to the employment of people with disability in the government sector including funding a pilot project with suitable agencies.
   * Ensure that people with disability are able to have access to the expected growth in disability sector jobs as a result of the implementation of the NDIS.
   * Ensure NDIS participant plans are adequately funded for employment supports as part of the Bilateral Agreement and Operational Plan.
2. **Inclusive employment**
   * Invest in good customised employment models such as the Ticket to Work initiative and projectABLE program.
   * Continue to support Government purchase of goods and services from Supported Employment Enterprises through BuyAbility.
   * The State Government leverages its enormous purchasing power to increase the employment of people with disability.
   * Continue to provide payroll concessions for employers who employ people with disability.
   * Increase participation, employment opportunities and pathways for people with disability within creative industries through social impact demonstration projects.
   * Advocate for NDIS funding in individual plans for employment support.

### Justice and protection, high quality, safe supports

1. **Funding for a Disability Justice Plan**
   * Develop and implement a WA Disability Justice Plan in partnership with people with disability and the disability sector, to ensure the criminal justice system is more accessible and responsive to the needs of people with disability.
   * Improve the availability of high-quality and specialised support required by people with disability who have contact with the justice system (whether they are victims or perpetrators of crime).
   * Work collaboratively with the Department of Communities and Western Australian Police to expand the ChildFIRST team to extend their skills and include interviewing people with disability.
   * Change the name of the ChildFIRST program to include people with disability.
   * Commit to ensuring the Bennet Brook Disability Justice Centre provide a safe placement option for a small group of vulnerable people who are unable to plead and stand trial due to a cognitive or intellectual disability.
2. **Recognition that the State Government has a continuing responsibility to drive the strengthening of Quality and Safeguarding**
   * Acknowledge the State Government has a continued responsibility to drive the strengthening of rights and improved access to justice for people with all types of disability, despite the implementation of new national NDIS Quality and Safeguarding Framework.
   * Provide recurrent funding for NDS to continue to lead and provide practical support to the WA disability sector on quality and safeguarding.
   * Fund access for mainstream providers to use NDS’ Zero Tolerance resources on abuse and strengthening safeguards (www.nds.org.au/resources/zero-tolerance). The training and advice is to increase the provision of safe and fair services to people with disability.
   * Invest in the co-design of comprehensive prevention education package for the disability sector workforce and people with disability.
   * Fund a specialist role to develop practical resources to assist disability service providers with supporting people with disability to get better access to criminal justice processes.
3. **Oversee the implementation of the National NDIS Quality and Safeguarding Framework for the benefit of people with disability in WA**
   * Ensure the NDIS Quality and Safeguarding Framework will not impose added compliance costs for providers needing to adapt internal systems and processes to comply with these new standards.
4. **Fund systemic advocacy**
   * Ensure systematic advocacy is funded within the disability sector.
   * Fund NDS to support and develop a range NDIS readiness initiatives related to building workforce capacity and skills as identified by the Industry Plan.
   * Continue supporting NDS to promote sector and workforce excellence including the Disability Sector Awards and hosting important milestone events such as celebrating International Day for People with Disability.

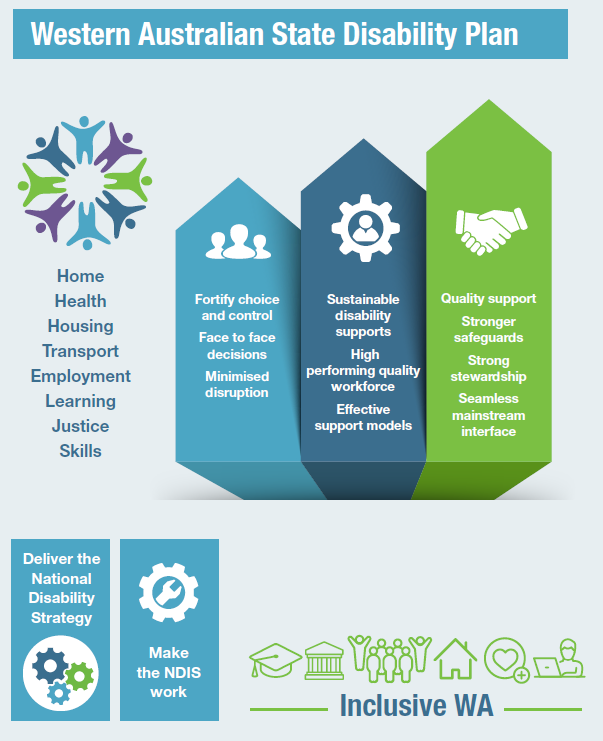


The State Government needs to consider the importance of effective market stewardship and the role it should play, particularly in avoiding market failure in the delivery of disability services in regional and remote communities. This extends to mainstream services and those within the NDIS.  
  
In regional, rural and remote markets, where there are highly specialised niche services or people with particularly complex needs accessing services, there is a need for service and market monitoring, management and mitigation in order to secure high quality disability services that deliver individual, family and community outcomes.  
  
There is evidence that in remote regions of WA the NDIS may accelerate the process of potential market failure. Safety net services and emergency supports need to be considered and a market steward would play a critical role in ensuring provision of last resort services. The State Government must ensure that disability services are delivered to thin markets. Without stewardship, people who are particularly vulnerable by virtue of their location or disability may experience service inequity.  
  
The WA and also the Northern Territory (NT) and South Australian (SA) landscapes have a vast footprint, which contribute to the challenges of consistently delivering basic services to remote and very remote communities and achieving an economy of scale. The implementation of the NDIS in WA, NT and SA brings significant challenges such as ensuring disability services are delivered to thin markets and in particular to Aboriginal and Torres Strait Islander communities.  
  
In 2017, the Productivity Commission argued more tailored responses are needed for thin markets within personalised approaches. For regional and remote centres (such as north-west WA and the tri-state APY/NPY lands) there is a need to consider choice and control in the context of the small market for services and often a single provider (or no provider) servicing these small or remote communities.  
  
This requires consideration of pragmatic allocation models – for example, a single organisation providing services to a collection of remote communities to enable economies of scale and allow providers sufficient billable hours to attract staff to the position.  
  
In addition, an alternate mix–mode funding approach could be trialled in WA, NT and SA that enables providers to access funding in the usual manner by basing their initial quotes using the National Pricing Guide but also being given the opportunity to put forward a case and access to top up funding to cover the additional higher costs associated with staff training / retention and travel in many regional, rural and remote communities in these States/Territory.  
  
Specifically for tri-state locations, there is opportunity for NDS to collaboratively lead discussion with the State Government and the NDIA to:

* Identify opportunities for block funding suitable providers where services would not otherwise exist or would be inadequate;
* Foster smaller Aboriginal Community controlled providers that work with local communities and engage local staff, with support or from larger experienced service providers, in particular those with a high level of community ownership;
* Employ and develop tailored workforce development approaches including Aboriginal staff;
* Develop an effective and cost-effective balance between bringing services to remote areas, and bringing people with a disability in remote areas to services; and
* Work with the State Government, Indigenous advocacy groups and other community groups to develop and refine funding strategies, better understand local and systemic issues as well as successful (and unsuccessful) approaches and diffuse this knowledge to other service providers, researchers working in this field and the broader community.

### Regional, rural and remote

1. **Proactive regional stewardship role**
   * Establish a State-Commonwealth taskforce to consider needs of regional NDIS participants, monitor the gaps and identify solutions.
2. **Tailored service responses not a one-size-fits-all approach, particularly for regional and remote WA**
   * Support the development of regional pricing frameworks to provide people with local choices where they live.
   * For each region in WA, support the development of NDIS implementation plans and customised workforce plans.
   * Guarantee disability services are delivered to thin markets. Safety net services and emergency supports need to be considered particularly in remote regions of WA where NDIS may accelerate potential market failure.
   * Identify which services or geographical locations are not suited to the introduction of increased competition based on case-by-case assessment of local conditions and requirements.
   * Consider choice and control in the context of small regional/remote markets for services often with a single provider (or no provider).
3. **Embed local decision making and close, face-to-face NDIS relationships by supporting a local governance structure**
   * Establish a network of regional coordinators that report to the NDIA WA State Manager to maximise face-to-face contact with NDIS participants across WA.
4. **Develop nine regional and local workforce plans**
   * Fund the development of regional workforce plans for each of WA’s nine development regions tailored to local conditions that identify pathways and feeders for recruitment.
   * Regional Development Commissions should play an active connecting role in linking training, recruitment and regional job growth.
   * Include regional service providers in state training plans and consider partnership models.
   * Audit existing programs at a whole-of-community level across regions to determine what supports will be available in addition to the NDIS.
5. **Sustainable pricing framework for supports and SDA including addressing regional pricing**
   * Ensure the NDIS pricing framework in WA is sustainable over the Bilateral Agreement period to allow disability service providers to meet the supply demands of the growing NDIS market, particularly in regional, rural and remote areas.
   * Ensure NDIA Pricing Reviews conducted as part of the WA transition (including that proposed for September 2018) will review current NDIS price controls and other market settings to decide whether they are appropriate for WA. Specifically, this review must consider whether they support the sustainable, efficient and quality delivery of disability supports to participants in regional, rural and remote areas of WA.
   * The Review must:
     + Be Independent and evidenced-based on the current costs of delivering disability supports in regional, rural and remote areas of WA and thin markets. This will include consideration of delivering disability supports to people with high and complex needs and those in rural and remote areas of WA.
     + Include extensive engagement with providers and other stakeholders in these areas.
     + Consider the merits of adopting a mixed/hybrid model of funding in thin markets across WA.
     + Examine whether NDIS price controls and other market settings, including the recommendations of the NDIS Independent Pricing Review, are appropriate for regional, rural and remote WA, or whether they should be modified.
     + Examine the appropriateness of the Modified Monash Model (MMM) category/classifications for WA.
   * Review recommendations must be based on evidence, including:
     + The current costs of delivering disability services including labour costs (as reflected in Enterprise Bargaining Agreements) in regional, rural and remote areas of WA.
     + The costs of delivering disability supports in rural and remote areas of WA should include an examination of the WA Regional Price Index to provide an insight into the differences in WA regional costs.
     + Whether the existing NDIS support catalogue and Price Guide accommodate WA service delivery models (including innovative support options) and apply appropriate rules (e.g. allowances for provider travel) in regional WA.
   * The focus of the review should not be to determine whether material differences in the costs of delivering disability supports in WA, relative to other jurisdictions, are likely to be sustained or transitory given it will be difficult to project this into the future. It is most unlikely that WA price controls will converge to national levels particularly in regional, rural and remote WA, given the cost of service delivery in these areas are unique to WA.
6. **Adequate ILC funding for the regions**
   * Consider establishing a grant funding round that pilots and tests different approaches in rural and remote areas. WA is provided insufficient ILC funding. A specific ILC funding round is required for regional and remote parts of the State. The State Government must ensure WA is provided with sufficient ILC funding into the future including a ILC funding round specific for regional, rural and remote parts of the State. WA has missed out on the funding from the national ILC Remote Grant Round, a piloted direct non-competitive $9M grant round for remote areas to provide placed-based and culturally specific information, resources and supports for people with disability living in remote communities.



# Disability Fast Facts

## Education and Training

People with disability (PWD) have lower levels of educational attainment.

* In WA, 30.9% of PWD (aged 15-64) completed year 12 compared to 58.3% of people without disability
* Many students have difficulties at school because they are not adequately supported
* In 2015, around 2 in 3 students with disability (64%), and 3 in 4 students with severe or profound disability (76%), had difficulties at school because of their disability (Australia)
* WA has a lower VET participation rate for PWD, at 6.2%, compared to the national average of 9.5%, NSW at 11.1% and Vic 10.2%

## Employment

PWD are under-represented in WA’s workforce, have higher unemployment and lower participation rates.

* PWD unemployment rate, 11.4% compared to 4.9% (2015)
* Participation rate, 57.8%compared to 83.6% (2015)
* State Public Sector, a low 1.9% (2017), below the Australian Public Service (3.6%), Westpac (12.1%,) and Australian workforce (9.9%)
* The main source of income for PWD aged 15-64 is wages/salary (39% but much lower than people with no disability at 69%)
* More PWD receive a Government pension/allowance as their main source of income than those without disability (35.1% compared to only 6.8%)
* More than 1 in 4 working-age PWD reported their employer as the main source of discrimination
* (27%) while around 1 in 6 reported work colleagues as the main source (18%)

## Housing

PWD spend more of their income on housing with many suffering housing affordability stress.

* PWD are twice as likely to be in the bottom 20%of gross household incomes, where 60%of income is spent on rental housing
* PWD are over-represented in housing assistance programs and waiting lists for social housing
* NDIS only assists 6% of 460,000 participants. There will be unmet need for affordable, accessible and well located housing of over 100,000 NDIS participants by 2020
* Huge demand also exists for similar housing from PWD not eligible for the NDIS
* Barriers to accessing suitable housing options for PWD include cost,(including high cost of modifying and retro-fitting housing), disadvantage or discrimination in competition for private rental properties, and a limited supply of universal ‘accessible’ housing

## Access, Inclusion and Participation

PWD do not have equal ability to move easily around the community which is essential for their economic and social participation.

In 2015, of people aged 15–64 with disability:

* 1 in 3 did not go out as often as they would like, almost unchanged from 2003
* More than 1 in 4 found it difficult to access buildings or facilities in the community
* 2 in 5 avoided community situations because of their disability
* Almost one third of PWD in WA had difficulty in using public transport, 25% or over 80,000

## Safety

PWD experience higher rates of abuse and violence.

* PWD with restrictions in core activities are 1.6 times more likely to have been victims of physical or threatened violence (16.9%compared to 10.3%)
* They are 1.7 times more likely to be victims of actual/attempted break ins (13.7% compared to 8%)
* Women with disability have higher rates of abuse - particularly those with psychosocial disability (12%) and ‘other’ disability (9%) compared to all people with disability at 5%

**Why?**

* Police, lawyers, judges and other staff do not always identify disability or respond adequately
* Processes fail to respond to individual reports
* Secondary protection measures to reduce future acts of violence, abuse or neglect are missed
* Lack of support to communicate and participate in all stages of the criminal justice process.
* Complaints processes are often inaccessible and ineffective
* NDIS Quality and Safeguarding mechanisms are expected to provide protection for NDIS participants – only 10% of the disability population
* PWD in prison, do not have access to supports, adjustments and aids
* Aboriginal PWD, are over represented in the justice system with very high levels of unmet care needs

## Health and wellbeing

PWD have poorer health outcomes than the general population.

* Higher prevalence of long-term health conditions and increased use of health services and hospitalisations
* PWD with severe or profound disability aged 15-64 years, are 10 times more likely to have check-ups with general practitioners at least once a month times more likely to consult specialist doctors over a 12 month period
* 5 times more likely to consult both specialist doctors and health professionals in the same period
* 46% of PWD aged 15–64 years report poor or fair health compared with 5% of the general population aged 15–64 years
* People aged under 65 years with severe or profound disability have a higher prevalence of long-term health conditions than people without disability
* 8% of people with severe or profound disability have mental health problems
* 2 in 5 (38%) of PWD who have difficulty in accessing buildings or facilities have difficulty accessing medical facilities (GP, dentist, hospital)
* 1 in 4 (27%) did not see a medical specialist when they needed to because of the cost
* 2 in 3 (64%) delayed seeing or did not see a dental professional because of cost

# Contact

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**About NDS**

National Disability Services (NDS) is Australia’s peak body for non-government disability service organisations representing over 1,100 non-government organisations, which support people with all forms of disability.

In WA, NDS represents over 100 specialist disability services organisations that provide services to tens of thousands of people with disability, their families and carers in the state including metropolitan, rural and remote regions. Our members provide more than 85% of services to people with disability valued at more than $580M worth of services. These range from home support, respite and therapy to community access, employment and more.

NDS and its members in WA are committed to providing high standards of care and supports and better outcomes for people with disability.

Our role includes provision of a range of access and inclusion services through ACROD Parking, Companion Card, Community Living and Participation Grants and support for the Changing Places Network.