

Federal Budget Submission

2020 was a long and difficult year for providers, particularly in relation to managing their services to minimise the impact of the COVID-19 pandemic but also in responding to the many serious bushfires that burned across Australia and other major weather events. It was a year without precedent for the disability sector.

These major events occupied the attention of providers; they needed to focus on providing high-quality disability supports despite these challenges. Many in the sector benefited from the additional financial support made available by the Federal Government, most notably the lifeline provided by JobKeeper payments. This welcome response by the Government saved some providers from closing their doors.

The busyness of the year lessened the attention that could be given to fine tuning the National Disability Insurance Scheme (NDIS) and Disability Employment Services in order to improve their performance, both for the people with disability they support and for the providers on the ground. This work must be a priority for 2021–22.

NDS is optimistic that improvements are possible over the coming year, with appropriate support from the Federal Government. The following recommendations point to how these improvements can be achieved.

Help NDS help Government

1. Re-fund NDS to undertake peak body activities of benefit to Government

For many years, NDS received funding from the Department of Social Services to undertake functions that assisted the Government, disability service providers and associated stakeholders. This funding assisted with tasks such as:

- consulting with providers to formulate consolidated advice to Government
- developing quality policy advice and position papers
- surveying providers on matters associated with workforce (through the NDS Workforce Wizard survey); the design and implementation of the NDIS; and disability employment
- early identification of issues of interest to the Department
- participation on a range of department reference and working groups
- keeping providers informed of Government requirements and other information
- collaborating and partnering with other key stakeholders

NDS's peak body funding ceased at the end of 2020. We urge the Government to reinstate this funding from July 2021, working with us to establish how we can strengthen our—and the Government's and other stakeholders'—contribution to delivering high quality disability supports for people with disability.

Complete the task of implementing the NDIS

NDS is aware of many reviews and initiatives in train to improve delivery of the NDIS. We recommend the Government focus on six practical actions that will help deliver the scheme, particularly to ensure there is sufficient supply of high-quality supports to meet demand. These are:

- an adequately funded NDIS National Workforce Plan
- resolution of pricing inadequacies
- creating a partnership with the provider sector to focus on practical solutions
- introducing a Provider Guarantee
- working with providers to identify short and medium-term solutions for participants living in remote and very remote areas
- driving the improvement of quality by funding the re-development, re-branding and delivery of the core elements of NDS's Zero Tolerance training and resources

2. An adequately funded NDIS National Workforce Plan

DSS has been stewarding the development of the NDIS National Workforce Plan, which is now close to completion. Effective implementation of this Plan is necessary to build the workforce that is required to deliver the supports demanded by participants.

NDS urges the Government to adequately fund this Plan so it addresses the widespread workforce shortages that are already apparent. Doing so will, we believe, ensure the disability sector is not only able to meet demand for services, but will have an enhanced capacity to become a key growth sector and provider of new jobs, in the post-COVID economy.

3. Resolution of pricing inadequacies

Despite being more than seven years into the NDIS, a number of pricing concerns remain which threaten the viability of parts of the provider sector and therefore the sector's ongoing capacity to meet demand for services. Of real concern is the inadequate price generated by the Disability Support Worker Cost Model, which is used to determine the prices paid for the majority of supports within the Scheme (since July 2020, this has included the prices for supports in Supported Independent Living).

The assumptions within the Cost Model are not realistic. Despite negotiating with the NDIA on this since 2013, inadequacies have not been adequately resolved. Disappointingly, what has been an annual price review is not scheduled to occur in 2021.

In November, the Queensland Productivity Commission released a draft report into its inquiry into the NDIS market in Queensland which raised concerns about pricing regulation. It recommends:

The Queensland Government should propose that the NDIA increase the independence of the NDIA's Pricing Reference Group. A Pricing Commissioner should be appointed who would report directly to the NDIA Board. The role of the Pricing Commissioner should be to:

- chair the Pricing Reference Group
- provide advice on pricing methodologies and parameters
- ensure that the NDIS Quality and Safeguards Commission has significant input into the annual pricing review process and is able to review proposed changes prior to changes being made.

The Pricing Commissioner should be supported by a secretariat independent of the NDIA.

The Disability Reform Ministers' Meeting should issue an annual risk appetite statement providing advice to the Commissioner and the NDIA Board on the appropriate balancing of competing participant outcome, market development and financial sustainability objectives in regulating prices.

To improve transparency of decision-making, Board decisions and supporting information should be made public.

These arrangements should be reviewed as part of the Australian Productivity Commission's scheduled 2023 review of NDIS costs.¹

NDS contends more transparent pricing processes are necessary. The above recommendations would be a step in this direction. If something like this approach is not tried, or is tried and does not produce more sustainable pricing, the sector will renew its push for pricing to be set by an independent body. On this issue, we note that both the Productivity Commission and the Joint Standing Committee on the NDIS, in separate reports at different times, have recommended that the NDIS Quality and Safeguards Commission be given responsibility for price setting for the NDIS.

4. Introduce a Provider Guarantee

The draft report by the Queensland Productivity Commission supports the introduction of a Provider Guarantee as a counterpart to the Participant Service Guarantee. Such a Provider Guarantee would focus the NDIA and the NDIS Quality and Safeguards Commission on the need to improve scheme processes that impact on providers; their regulatory requirements should be reviewed regularly to ensure that they produce net benefits. Their processes should also be streamlined to minimise unnecessary administrative burden.

A timetable of such reviews should be released publicly, with the review process being transparent and involving consultation, if not co-design, with the sector.

¹ Report found at <https://qpc.blob.core.windows.net/wordpress/2020/11/NDIS-market-in-Queensland-draft-report.pdf>, viewed 27/01/21

5. Partner with providers to develop improvements to systems and processes

Successive State of the Disability Sector Reports² show there is room for improvement in relationships between the sector and governments. In the latest report³, released in December by NDS, only 51% of disability service providers believed policy reforms are heading in the right direction. 63% of all organisations agreed there are too many ‘unnecessary’ rules and regulations; and 59% did not think the NDIS system and processes are working well.

Disappointingly, 69% agree that the NDIS policy environment is uncertain.

There continues to be diversity in provider attitudes towards the Quality and Safeguarding Commission and the Framework. Half of respondents (50 per cent) said they are confident that the Framework will improve the quality of services and outcomes, which was a significantly higher percentage compared to previous Surveys.

However, attitudes towards the Commission and its relationship with providers remains ambivalent. Only 29 per cent of respondents said the Commission is working well with providers; 33 per cent indicated this was not the case.

A response to this disturbing picture of dysfunction is needed. Providers do not feel that their concerns about how the NDIS is operating are given sufficient attention, they are not kept informed about changes being planned or implemented, their opinions regarding priorities for action are not sought, and their ideas for solutions for problems are not encouraged.

As we have argued in recent years, a genuine partnership between the Agency, the NDIS Commission and providers needs to be established in order to identify and prioritise the systems and processes that require overhauling and to propose pragmatic and efficient solutions. Providers cannot be expected to continue to carry the excessive administrative burden of operating in the NDIS. It is simply not fair to expect non-government organisations to bear the cost of administrative burdens incurred by a \$25B pa, government-funded scheme.

Existing engagements between providers, the NDIA and the NDIS Commission should be re-invigorated. They should also be supplemented with a group that has an operational focus and is tasked with finding pragmatic solutions to inefficient and costly systems and processes.

² All reports are available at <https://www.nds.org.au/item/nds-state-of-the-disability-sector-report> or on request

³ See 2020 report at <https://www.nds.org.au/item/nds-state-of-the-disability-sector-report>

6. Work with providers to identify and implement immediate actions to improve the supply of supports to participants in remote areas

It is disappointing that another year has passed without seeing the improvements in delivering the NDIS in remote communities (for both Indigenous and non-Indigenous participants) that are desperately needed. The utilisation of plans of participants living in remote communities continues to lag well behind that of participants living in other parts of Australia. Currently, the NDIS is not working well due to factors that include:

- inadequate prices to cover the cost of delivering supports in remote and very remote communities
- small numbers of active service providers
- staff shortages
- the cost of travel for providers is high and not adequately covered by funding arrangements
- inconsistency in the NDIA's approach to providing funding for transport
- limited ability to fund costs for informal supports when participants need to travel
- participants expressing their right and desire to stay on country which limits their access to supports
- the time needed to establish trusting relationships within remote communities
- staff turnover
- inadequate arrangements to deal with crises, including provider of last resort arrangements
- tension between individualized and community approaches
- cultural capacity of staff (compounded by high staff turnover)
- language barriers
- limited access to some communities during the wet season
- little new Specialist Disability Accommodation being constructed.

These problems are compounded in many areas by issues including:

- poor community infrastructure
- inadequate and overcrowded housing
- lack of accommodation for visiting staff
- inadequate and expensive transport
- shortage of income to meet basic needs.

Delivering supports in remote and very remote communities is complex, often difficult, and expensive. The NDIA's Community Connectors Program is a welcome initiative—it needs to be well-supported by the NDIA and evaluated.

The NDIA has both a Rural and Remote Strategy and an Aboriginal and Torres Strait Islander Strategy. Both Strategies are pitched at a high level and are clearly ineffective at getting supports to participants where they live in these remote environments.

Solutions are needed now.

NDS urges the Agency and governments to draw on the immense knowledge of providers of disability supports, together with those that provide community and/or health services, state governments and other individuals. Short-term, pragmatic approaches to getting supports to participants in remote areas need to be implemented immediately while longer-term ones are found. To make it happen, the Agency will have to adopt different systems and processes, and have greater flexibility in its approaches. Providers need to be involved in the monitoring of whether improvements are being achieved.

7. Drive the improvement of quality by funding the re-development, re-branding and delivery of the core elements of NDS's Zero Tolerance training and resources

NDS's Zero Tolerance Initiative has, over several years, continued to support disability service providers to take a holistic approach to the prevention, identification and response to allegations and incidents of abuse and neglect in different service environments. It educates providers about the responsibilities that sit at every level of an organisation to promote human rights. It offers a range of tools and resources including on-line training, practice advice, workbooks, templates, videos and guides.

The resources reflect evidence around what works, the actual experiences of people with disability, and practical feedback from disability service providers and frontline staff. Organisations can use the range of Zero Tolerance resources to take a whole of organisation commitment, from support workers to the board, to prevent and respond to abuse and neglect.

As some of the resources were developed for a pre-NDIS environment, they need updating, refreshing and a concerted effort to drive their uptake across the sector.

Funding is required to extend the reach of this important work to ensure the Australian disability sector is able to achieve world's best practice in providing services which are high quality and safe, and free of the threat of violence, abuse, neglect or exploitation of people with disability.

Assist more people with disability to achieve their employment goals

The lack of progress on improving job opportunities and outcomes for people with disability is disappointing. Australia can do better, with the following recommendations made to start this important work.

8. Drive the implementation of the NDIS Participant Employment Strategy

The NDIS Participant Employment Strategy 2019-2022 requires funding to ensure its goals are met. The strategy's main goal is to increase the number of NDIS participants of working age in paid employment. Based on the strategy's projections this would equate to around 70,000 NDIS participants based on a full scheme rollout number of

460,000 participants. The NDIS September quarterly report, notes 23% of participants are in paid employment (around 49,500 of 230,100 participants of workforce age).

Of the Strategy's five key focus areas, number one involves achieving an increased rate of participant employment goals and aspirations in NDIS plans.

NDS recommends that the Government allocates sufficient resources to the NDIA to achieve the Strategy's main goal. This will ensure that planners and LACs are trained and equipped to better support NDIS participants of workforce age to direct funding to achieving employment goals and career aspirations. This should be combined with a 'work first' approach in planning to support NDIS participants of working age.

In addition, funding to the National Disability Employment Strategy, the APS Disability Employment Strategy and the new National Disability Employment Strategy should be prioritised to help drive the increased employment of people with disability and the removal of systemic barriers to achieving this.

9. Recalibration of the DES Risk Adjusted Funding Model

Providers have long expressed strong concerns that the DES risk adjusted funding model is impeding their ability to produce long-term positive outcomes for participant cohorts such as those with Intellectual Disability/Autism and Eligible School Leavers.

NDS recommends, as a matter of urgency, that the Risk Adjusted Funding Model is recalibrated from July, which would be three years after the commencement of the current contract. The review work required for the recalibration should be conducted in the six-month period before that date. A recalibration will ensure appropriate supports are offered to participants that enhance the longer term employment outcomes achieved by the DES program, especially in the economy's post COVID recovery period.

10. DES Information Technology and Cyber Security

To be eligible to tender for future contracts, service providers will need to implement an Information Security Management System (ISMS) and be accredited to ISO 27001 by August 2021. This is in addition to ensuring compliance with the National Disability Service Standards and the NDIS Quality and Safeguarding Framework.

NDS recommends that the cost of development, implementation and accreditation be subsidised by the Government in a manner similar to the current funding of the audit costs for accreditation under the National Disability Service Standards.

11. Broaden access to the Eligible School Leavers (ESL) cohort in DES

Currently, the Eligible School Leaver (ESL) cohort in DES is restricted to students in their final year of school and Australian School based Apprenticeships/Traineeships. In addition, it is evident that DES providers are increasingly reluctant to service the ESL cohort as they are usually classified at Level 1 funding, which is insufficient to provide the necessary support needed to address the cohort's barriers to employment.

DES data shows that while ESL participants have increased in number from 3,811 at June 2018 to 4,567 at December 2020, the proportion of ESL participants in the DES caseload has declined from 1.9% to 1.5% over that period.

NDS recommends that:

- eligibility for ESL be extended to all DES participants aged 14 to 22, in line with recent changes to NDIS School Leaver Employment Supports.
- in order to recognise the additional barriers to employment for DES ESL participants, they should be automatically funded at level 4.

12. Rescind the removal of thirty hours plus work capacity and non-allowee job seekers from eligibility for DES

NDS is concerned that the 2020 budget initiative removing two classes of job seekers from eligibility for DES (those with thirty hours plus work capacity and non-allowees) will have adverse consequences for both jobseekers with disability and DES providers. Based on the current flow of eligible job seekers into DES this change will result in approximately 10 per cent fewer referrals to DES.

Changes to the eligibility criteria have the potential to exclude some young unemployed people from the DES Program at a time when they are most vulnerable. DES Providers support young people who are not receiving income support to gain employment, which reduces the Government's budget outlays.

The requirement for young people to be in receipt of income support may delay their ability to access specialist support, which is not available through jobactive.

Family circumstances such as having two parents who work, should not exclude a young person from receiving specialist DES Program support when they need it.

Current DES participants under age 17 who have left school cannot participate in Transition to Work or jobactive.

The current caseload of some DES providers includes around 20% of young people not in receipt of Income Support. The changes will impede the capacity of DES providers to retain staff and deliver specialist programs, especially in rural and regional areas.

Consequently, NDS recommends that the Government reconsiders the changing of the DES eligibility criteria for the two cohorts identified above.

13. Extend the Pensioner Work Bonus to DSP recipients

NDS and its membership have long advocated for the introduction of a "social wage" that bundles the welfare benefits and wages of employees with disability. To achieve this, some modification of the DSP income test is required to ensure that employees retain more of their wages following any increase.

The most logical way to immediately increase the wages of supported employees would be to extend the pensioner work bonus to people on DSP. The work bonus raises the income test threshold by \$150 per week. Extending the work bonus to people on DSP would remove a disincentive to work and align with government policy, which seeks to increase the rate of people with disability in employment.

The Fair Work Commission's SES Award Review decision identifies new wage setting arrangements for supported employees. In combination with the wage increases arising from that decision, extension of the work bonus to supported employees will ensure a significant increase in their wages.

NDS recommends that the government introduces a key component of a social wage for supported employees by allowing them access to the work bonus.

14. Extend eligibility for JobMaker Hiring Credit to DSP recipients

NDS is concerned that exclusion of DES participants aged 16-35 receiving DSP from eligible jobseekers for the JobMaker Hiring Credit will compromise the efficiency and effectiveness of the DES program and further marginalise jobseekers with disability from gaining employment. The exclusion of DSP recipients also runs counter to Australian Government disability employment policy and strategy.

NDS recommends that the Australian Government include DSP recipients in the definition of an "Eligible Additional Employee" for the JobMaker Hiring Credit.

15. Establish a structural adjustment fund for capacity building measures that assist the supported employment sector

NDS has recently developed an Industry Vision for the supported employment sector. The Industry Vision is intended to guide Disability Enterprises through a post NDIS and COVID-19 operating environment, as well as position the sector to provide a wider range of quality employment options to NDIS participants.

The period covered by the Industry Vision will be one requiring profound structural adjustment across the sector, during a period where the Australian economy is recovering from the impacts of the COVID-19 restrictions. The Government's Temporary Viability Support (TVS) package of \$24.5 million announced in April 2020 and subsequent TVS grants to the sector were a useful start in this adjustment process.

NDS recommends the Government establish a sector Structural Adjustment Fund that enables organisations to:

- undertake change management planning
- operate innovative business and service models through targeted seed funding, loans and/or grants
- adopt measures that enhance business productivity and which apply technology
- gain access to relevant business and service model expertise by collaborating extensively with other supported employment services and mainstream businesses

- build the capacity and skills of their support workforce to provide a wider range of employment options.

16. Ensure an NDIS price that reflects reasonable costs incurred in supporting participants in employment

The new NDIS ‘Supports in Employment’ funding for supported employment was introduced in mid-2020. Supported employment providers can continue to use a transitional rate of funding based on the Case Based Funding rates until the end of 2021.

The new pricing framework has received a mixed reception from the sector. Providers are particularly concerned about the level of additional compliance costs incurred in administration of the new pricing framework.

NDS recommends that the supports in employment pricing factor in the additional costs of administration and cover the shortfall in employer costs that arises from the reduced productive output of supported employees (the Productive Output Gap).

17. Securing the future of Disability Enterprises through increased procurement

DSS has previously contracted NDS to deliver a range of social procurement initiatives. This funding had enabled NDS’s BuyAbility Procurement service to provide opportunities for government and commercial purchasing that enhanced the financial viability of Disability Enterprises. In addition, NDS has maintained a national directory of Disability Enterprises through the www.buyability.org.au website.

To ensure Government policy boosts employment participation of people with disability, Disability Enterprises must remain viable. Providing opportunities for Disability Enterprises (which employ over 21,000 people) to gain reliable income streams from Government procurement is a proven way to achieve this goal.

NDS recommends that the Government provides ongoing support to the NDS Social Procurement Service to enable it to maintain elements of the BuyAbility initiative, including the BuyAbility Website, Brokerage Services and the BuyAbility Social and Economic Impact Measurement Tool.

18. Subsidise the increase in supported employee wages arising from the Review of the SES Award

The Fair Work Commission delivered a landmark decision in its Review of the Supported Employment Services Award in late 2019. A new sector-wide wage fixing methodology for supported employees was proposed, to be implemented through a redesigned Award classification structure. Supported employee wages were to reflect both the value of their work and their rate of productive output. In addition, a new hourly minimum wage rate was set of \$3.50. However, this decision has been challenged in the Federal Court. Should the challenge be successful, a new wage setting methodology will be required.

Whatever the outcome in the Federal Court, it is expected that higher wages will need to be paid to some supported employees. Funding these is a concern for the sector.

NDS recommends that a time-limited wage subsidy be provided to Disability Enterprises (similar to the previous subsidy provided to disability enterprises using the SWS). NDS recommends that such a wage subsidy be provided on tapered basis over a maximum period of three years.

19. Subsidise the increase in supported employee superannuation contributions

The SES Award's superannuation provisions for supported employees were altered by the Commission, increasing the minimum weekly contribution rates to 9.5% or \$15 per week, whichever is greater, from January 2021. In making this decision, the Commission cited the need to increase the rates so as to ensure supported employees have access to more appreciable superannuation benefits upon their retirement. The increased contribution rate will constitute yet another significant unfunded increase in the wage costs of many Disability Enterprises.

NDS recommends that the Government fully fund the increase in superannuation contributions for supported employees in Disability Enterprises for a period of at least 12 months. Ongoing subsidisation of this increase should be considered by the Government if an examination of future budget savings on pensions for supported employees can be demonstrated.

20. Improving school to work transition

NDS operates the Ticket to Work program, testing and gathering evidence on how to improve youth disability employment through effective school to work transition. Ticket to Work is aligned with international best practice and research and supports effective integration and reduced duplication of mainstream and disability supports.

Ticket to Work has demonstrated that young people can thrive in open employment when prepared and supported at school. The Ticket to Work model has delivered 1,649 jobs for students with significant disability. In addition to its social and fiscal benefits, an independent Ticket to Work evaluation showed that participants are substantially more likely than a similar comparison group to:

- work in open employment
- complete year 12
- participate in the labour force
- be involved in community and socially active.

NDS recommends that in order to enhance the employment opportunities of young people with disability, the Ticket to Work model be funded on an ongoing basis as an ILC initiative to deliver:

- community-based coordination intermediaries to ensure an effective interface between the NDIS, disability employment providers and education and mainstream supports

- a Technical Assistance Centre to ensure all sectors, schools, employment providers and NDIS service providers have access to and can perform evidence-based practice that improves employment outcomes.

National Disability Strategy: The path to a more inclusive Australia

Achieving better outcomes under the National Disability Strategy requires greater commitment from all governments and transparency about what they have done and how effective it has been. The development of a new National Disability Strategy is underway and provides an opportunity for the Federal Government to appropriately resource the Strategy to ensure it achieves its goals.

21. Resourcing the National Disability Advisory Council

As part of the ongoing commitment to undertake meaningful consultation with people with disability, State and Territory governments have agreed to establish a National Disability Council. The National Disability Council requires adequate funding and resources to ensure that people with disability have an ongoing role in developing, reviewing and monitoring the National Disability Strategy.

22. Support the development and implementation of robust reporting mechanisms

The Productivity Commission's Review of the NDA⁴ calls for a single person-centred performance reporting arrangement across the NDA and the Strategy. The Federal Budget should support the development and implementation of a simple standard framework.

Reporting should occur annually to Parliament at the state and territory level and before it is consolidated in a report to the Federal Parliament. A new Strategy provides the opportunity to produce an annual report which combines the objectives and outcomes achieved by the NDA, the Strategy and the NDIS. This would allow us to track how people with disability are faring in the Australian community.

23. Create a more effective National Disability Agreement

Ensuring that the National Disability Strategy achieves its vision will require a substantive re-commitment by all governments to the social and economic imperatives underpinning the Strategy. As a funding agreement, the NDA is pivotal to ensuring the success of the Strategy and unless there is another mechanism which commits investment, information on a new NDA should be released alongside the Strategy.

At this stage the response to the recommendation by the Productivity Commission that a new, more effective NDS should be developed with solid performance targets and appropriate resources committed by all governments has not been released.

⁴ See p.2 of the 2019 Productivity Commission 'Review of the NDA' at <https://www.pc.gov.au/inquiries/completed/disability-agreement#report>

This Budget represents an opportunity for the Federal government to commit the funding that it will direct toward the NDA.

24. Improve performance across key areas identified in the Strategy

• Housing

In our submission to the National Disability Strategy, NDS broadly supports the six outcome areas identified, however we called for housing to be a priority. The demand for accessible and affordable housing is high and will increase. At present, there are 4.4 million Australians living with some degree of disability, a number that is growing.⁵ The right decisions now will set us up to meet the choices of people with disability and older Australians to live in their communities for as long as they desire.

The National Disability Insurance Scheme will not solve this issue. Not all people with disability with housing needs are participants in the NDIS and not all NDIS participants will have their needs met by the Scheme.

Data collection, access and use should be a priority of the Strategy. The housing needs of people with disability—including the profile, preferences and demand for housing—needs to be better understood. This data needs to include those who are ineligible for the NDIS and those NDIS participants who are unlikely to be eligible for Specialist Disability Accommodation (SDA).

The current budget provides an opportunity for the Commonwealth to lead the way in supporting changes to National Construction Code requiring all new builds to be accessible, developing a framework that enables data from all States and Territories to be collated and used to drive change and to develop and resource projects that encourage and fund the development of innovative, accessible and affordable housing options for people with disability.

• Health

Australia's health system needs to be equipped to support and respond to the needs of people with disability and to have mechanisms in place to resolve disability specific issues.

Health professionals should be supported to understand their role in changing negative community attitudes, and given the tools to support people with disability, their families and carers.

The Disability Royal Commission's summary of submissions to the health issues paper notes:

Multiple respondents, including health professional bodies, highlighted how health professionals are not always equipped to communicate with people with a

⁵ People with Disability in Australia, Australian Institute of Health and Welfare (AIHW), Australian Government, web report, viewed 29/10/2020, link

cognitive disability. Respondents noted that this meant they were not able to conduct a proper health assessment and treatment of conditions.⁶

Throughout COVID-19 we have seen our health system develop its capacity to respond to the varying needs of people with disability and to develop strong relationships with the disability sector. This includes disability service providers who continue to be the 'front line' in keeping people safe.

NDS has a strong track record in building the capacity of the disability sector to respond to national issues. We have established Zero Tolerance (see above) in partnership with the disability sector to assist disability service providers to understand, implement and improve practices which safeguard the rights of people they support. We seek funding for a similar initiative, Safer and Stronger (based on a current initiative in Victoria) would assist the sector adapt their operations both in light of COVID-19 but also to ensure better health outcomes for people with disability.

- **Education**

Many children and adults with disability are still being denied equal access to education.

People with disability are significantly disadvantaged in both education and employment. For this reason, 'learning and skills' has been proposed to remain as one of six priority areas identified for action within the new Strategy.

Interfaces between the NDIS and education systems have not been adequately resolved. An example is how the NDIS interfaces with early childhood learning. The Inclusion Support Subsidy is inadequate to meet the costs of including children with significant disability. For this reason, many of these children are denied the benefits of early childhood learning. Improved funding in this budget is required for the inclusion of children with disability in early childhood services.

The Commonwealth is in the process of reviewing the National Disability Education Standards and in this budget, there is an opportunity to link these to the National Disability Strategy, consider linking performance against the Standards to funding of education and training providers (including schools) and increase capacity of staff across the system to meet the training and education needs of people with disability.

⁶ Overview of responses to the Heath Issues paper, Disability Royal Commission, October 2020, p. 3

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National Disability Services is the peak industry body for non-government disability services. It represents service providers across Australia in their work to deliver high-quality supports and life opportunities for people with disability. Its Australia-wide membership includes almost 1200 non-government organisations which support people with all forms of disability. Its members collectively provide the full range of disability services—from accommodation support, respite and therapy to community access and employment. NDS provides information and networking opportunities to its members and policy advice to State, Territory and Federal governments.