

National Disability Services (NDS) Western Australia Pre-Budget Submission Key Priorities 2024-2025

Prepared November 2023

NDS National
Disability
Services

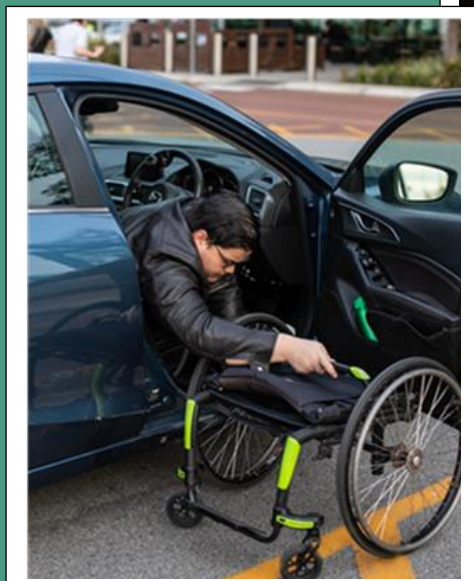


Table of Contents

About National Disability Services	3
Introduction	4
Priority 1: Investing in the Disability Sector Workforce	8
1.1. Strategies and Funding Mechanisms for Workforce Development	8
1.2. Remove barriers and promote incentives to attract and retain staff	9
1.3. Targeted disability workforce attraction campaigns	10
1.4. Support to build a diverse and culturally secure workforce	11
1.5. Investment in Innovative Technologies	11
1.6. Alternate and shared housing schemes for workers	12
Priority 2: Improving the Effectiveness of the NDIS	13
2.1. Implementation leadership and co-design	13
2.2. Best Practice Pricing	14
2.3. Insurance	15
2.4. Quality of Disability Services	15
2.5. A Redesigned NDIS for Children, Young People and Families	16
Priority 3: Building Accessible Communities and Participation.....	17
3.1. Connected Ecosystem of Support.....	17
3.2. Community Access and Participation	19
3.3. Inclusive design in service provision	19
3.4. A pathway to better home and living supports	20
3.5. Accessible public and on-demand transport	20
3.6. A focus on employment outcomes	21
Priority 4: Adapting to further reforms	22
Conclusion	22

About National Disability Services

National Disability Services (NDS) is the peak body in Western Australia and Australia for non-government disability service providers, with over 160 members in Western Australia and more than 1000 members nationally. We provide information and networking opportunities to our members and policy advice to State, Territory and Commonwealth governments. Our members collectively offer the full range of disability services; from supported independent living and specialist disability accommodation services to respite, therapy, community access and employment.

NDS in WA runs a number of important projects and programs. These include the Core Services Program, NDIS Job Matching Service (JMS) and the Quality and Safeguards Sector Readiness Project. NDS also provides access and inclusion services including the ACROD Parking Program, Companion Card, and access to MLAK keys for Changing Places to more than 100,000 Western Australians with disability right across the State.

NDS is committed to improving the disability service system to ensure it better supports people with disability, their families, and carers, and to building a more inclusive community. NDS has a deep commitment to supporting the implementation of a successful National Disability Insurance Scheme (NDIS) and is supporting service providers across Western Australia as they work to thrive within this contemporary landscape.



Introduction

Significant change in the disability landscape is imminent, with the once-in-a-decade review of the NDIS, and the 222 recommendations of the Royal Commission into Violence, Abuse, Neglect and Exploitation of people with disability.

The disability reform agenda we're in now follows ten years of intensive reform since the introduction of the NDIS. We are on the precipice of another period of major reform, especially following the Disability Royal Commission (DRC) and the NDIS Review, which will likely be intensive over the next 2-3 years. This will add an immense burden on disability providers to be able to understand and make the significant changes that will be required.

Reform design and implementation of the DRC and NDIS Review recommendations should be driven by the sector and include a WA Advisory Committee supported by the establishment of an Industry Transformation Fund.

NDS has established 10 priorities for NDIS reform that will impact service provision in Western Australia, they are:

1. Co-designed sector led implementation and transformation
2. Best practice approach to pricing including an independent pricing mechanism
3. Strategies and funding mechanisms for workforce development and retention
4. Targeted payment reform
5. Regulatory reform and support for quality
6. Improved planning and support pathways
7. A joined-up ecosystem of support
8. A pathway to better home and living supports
9. Focus on employment outcomes
10. A redesigned NDIS for children and families

(These are outlined in detail in Priority 4 section of this document)

The announcement that a Commonwealth Disability Royal Commission taskforce, led by DSS, to co-ordinate a whole-of-government response to the 222 recommendations is welcomed. It's critical that the State plays a strong leadership role to ensure the WA disability sector is better equipped to provide quality and safe services. This is of the up most importance for WA regional and remote locations where the risk of market failure is at its highest and vulnerable West Australians with disability are unable to exercise their human rights and have equitable access to safe services.

Alongside the DRC recommendations and NDIS Review reforms, we also have the ongoing reporting and evaluation work of Australia's Disability Strategy and the State Disability Strategy, an Employment White Paper being driven out of Treasury, and revision of both the Commonwealth Disability Services Act and WA Disability Services Act. In the employment space, there is the design of the new Disability Employment Services (DES) program as well as the transition to a new wage system in Supported Employment. From a workforce perspective, there is development of a new National

Strategy for the Care and Support Economy, which is being driven out of the Department of Prime Minister and Cabinet.

The renegotiation of the Bilateral Agreement between the Commonwealth and Western Australia on the NDIS will also have impacts. It will be essential that West Australian disability service providers, as experts in the provision of services to people with disability, are able to input into these important reviews and reforms and respond effectively to any changes that result.

NDS will be working hard to draw out the implications of all reforms for providers and translate the information into digestible updates for members. As the reform process continues so does our advocacy. NDS is continuing to represent member interests in a series of forums with Minister Shorten, Minister Punch, the Director General of the Department of Communities Mike Rowe, the NDIS Commission and government officials.

Disability service providers in Western Australia continue to operate in a highly complex environment. Our State of the Sector Report 2022 found that 67% of respondents from the Western Australian disability sector believe that conditions have worsened, and 36% expect to make a loss in the coming year. Award changes, inflation, tight NDIS pricing and rising costs of compliance are having a significant impact on the economic viability of many organisations, with anecdotal reports indicating that some are considering mergers and acquisitions.

The disability sector in Western Australia is extremely concerned about their ability to deliver services using the price limits set down by the NDIA as 83% of respondents indicated in a recent pulse survey by NDS. NDS is hearing from providers around the State that they are overwhelmed, struggling with viability concerns, coupled with the constant change including the introduction of the NDIA PACE system, many in the sector are exhausted and requiring support.

Another key issue impacting many Western Australian providers is the cost and access to insurance. Providers are reporting difficulties in gaining PSA (physical and sexual abuse) insurance, and limitations and onerous conditions associated with such insurance. NDS has been raising insurance concerns at both federal and state levels, with one line of action being a possible industry roundtable on the issue. The State Government's response to the DRC should consider expansion of the Insurance Commission WA report to disability services.

The State of the Sector Report 2022 also found that few organisations plan to deliver new types of services in the year to come, even though approximately 80% were unable to meet the demand for services over the course of the last 12 months. In many cases, the incapacity of organisations to meet this demand has been related to workforce shortages. The sector has been long plagued by skills shortages, though these issues have been severely exacerbated by a low unemployment rate, low levels of migration, and struggles with retention. As the sector emerges from a period of extreme stress throughout the COVID-19 pandemic period, organisations are grappling with retaining their fatigued workforce, who they rely upon to ensure

continuity of supports for West Australians with disabilities, while also trying to attract skilled workers in a highly competitive market. Shortages of allied health professionals and individuals with specialised skills in providing supports to participants with complex needs are particularly acute and are having significant impacts on the availability and quality of supports for West Australians with disabilities.

NDS thanks Minister Punch and the Cook Government for their significant investment to date and calls for the State Government to make further long-term investment enabling comprehensive program development, evaluation, and improvement. This will help ensure that West Australians with disabilities and the organisations who support them are able to thrive in the face of an array of challenges during this budget period and beyond.



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In summary, we recommend that funding be made available for the following:

Priority 1: Investing in the Disability Sector Workforce

Initiatives to address workforce development, removing barriers to attract and retain staff, increasing diversity and cultural security in the workplace, encouraging young people into the sector, access to innovative technologies, and alternate housing schemes for staff. Fund the NDIS Job Matching Service (JMS) and other workforce development programs including Think Support, Enterprise Training, and subsidised training.

Priority 2: Improving the Effectiveness of the NDIS

Initiatives to address NDIS Reform implementation, best practice pricing, access to appropriate and affordable insurance, standardised quality and safeguarding requirements, continued funding of the Quality and Safeguards Sector Readiness Project, and a redesigned NDIS for children, young people, and families.

Priority 3: Building Accessible Communities and Participation

Initiatives to address fostering a connected ecosystem of support, inclusive design in service provision, accessible and affordable housing, call for a WA Disability Housing Action Plan with urgent resource allocation, accessible transport in the regions, and provision of education, training, and employment opportunities.

Priority 4: Adapting to further reforms

Initiatives to building a strong disability eco-system to adapt and respond to the DRC and NDIS review and ensure a state of the art disability system for the 411,500 people with disability, their families, carers, and workers. Establish a WA DRC and NDIS Review implementation taskforce.

Priority 1: Investing in the Disability Sector Workforce

The WA disability sector workforce requires direct investment to attract and retain skilled workers in a highly competitive employment market to ensure adequate service delivery to the community.

The 2023 NDS Workforce Census reported that across WA 70% of staff were in permanent roles and 30% casual. For permanent employees, part-time employment continued to be very high at 78% and full time 22%. Considered together, these figures may reflect a tightening labour market in the disability sector and the broader care sector. Organisations may be responding to this economy-wide battle for talent by offering permanent (part-time) positions to retain workers. Turnover rates for permanent staff averaged 14% while casual turnover was at 22%.

The NDIS Review has heard many NDIS workers are suffering burnout; that three out of four NDIS workers are employed part-time or casually; that many workers can't access training and feel they have limited career opportunities; and that heavy administrative burdens are delaying people from starting work or from working efficiently.

Following extensive consultations with disability service providers in WA and a review of current policies and data, the following strategies have been developed to address critical workforce issues:

- Strategies and funding for workforce training and supervision to ensure a diverse, well-trained, and engaged workforce;
- Removing barriers and highlighting the benefits and rewards of working in the disability sector;
- Targeted disability workforce attraction campaigns;
- Support and resources to build a diverse and culturally secure workforce;
- Investment in innovative technologies to expand the reach of disability services and supports; and
- Innovative alternate and shared housing schemes for disability support workers.

1.1. Strategies and Funding Mechanisms for Workforce Development

A skilled workforce supports people with disability to reach their full potential and attain the highest possible health outcomes throughout their lives. Attracting and retaining disability sector workers with the right values and skills remains an issue. The demand across the care and support sectors will only increase, while wages and conditions reflect the low value that the community places on these careers. Current NDIS pricing does not support investment in training, support, and supervision.

Shared service functions for areas such as in-house training where an organisation cannot afford it alone, resource partnering with other providers should be explored. A shared services model would have benefits potentially for back-office functions as well as for trainer roles, and workforce planning roles.

Promoting the growth of allied health assistants (AHAs) in the disability sector is an effective approach to mitigate skill shortages among allied health professionals and respond to the growing demand for services. However, ensuring the success of this initiative requires senior allied health professionals to offer guidance and supervision to AHAs, which can present financial resourcing challenges for service providers.

Recommendations

- Influence work being undertaken to develop the National Care and Support Economy Strategy to co-design, fund and implement tailored disability workforce strategies for WA and address issues in remote and regional areas. This strategy should consider mechanisms to fund training and worker support that is responsive to individual participant and worker needs, the provider context, and the place where support is being delivered.
- Implement modern awards and enterprise agreements to support career progression and professional development. These can include qualification-based classification structures and opportunities for subsidised training and continuation and refining of the Enterprise Training Program.
- To address disability workforce acute challenges, ongoing investment is needed to ensure quality service delivery to people with disability. The NDIS Job Matching Service (JMS) program should be funded to be the important industry focused connector service between disability employers and the complex changing array of employment and training opportunities available.
- Fund workforce development programs including Think Support, Enterprise Training, and subsidised training.
- NDS, with funding, to identify shared service models and frameworks to help overcome organisation resourcing limitations where fulltime skilled staff are not affordable.
- Identification and recognition of transferrable skills and provision of gap training in the form of micro-credentials.
- Supporting adequate supervision and learning and development for allied health assistants by factoring this into and connecting between NDIS pricing and Award conditions.

1.2. Remove barriers and promote incentives to attract and retain staff

The cost and time needed to obtain the mandatory NDIS Worker Screening Check is a barrier to new workers joining the disability workforce, particularly in a competitive labour market. The inaccessibility of the application process is also challenging for many with restrictions around accepted identification documents and the need for digital literacy. It is also concerning that workers employed by unregistered NDIS Providers are not required to have the Check.

“The NDIS Worker Screening Check is a mechanism that helps NDIS providers determine that individuals seeking to work, or already working, in certain NDIS roles do not present an unacceptable risk of harm to people with disability”

In addition, increasing the limit on student visa work hours, currently capped at 48 hours per fortnight, and allowing additional hours for training would not only financially assist international students but also contribute positively to addressing labour shortages.

Recommendations

- Standardise compliance requirements and improve access to NDIS Worker Screening Checks in Western Australia.
- NDIS Worker Screening Check extended to include unregistered NDIS Providers.
- Increasing the limit on student visa work hours above the capped 48 hours per fortnight and allow additional hours for training.

1.3. Targeted disability workforce attraction campaigns

State Government investment in the local “Think Support” social media campaign has been welcome. Ongoing investment to expand both the target audiences and reach of this Campaign is recommended.

Recommendation

- State Government investment in campaigns that target cohorts likely to be attracted to flexible part time work such as tertiary students, parents of young children, and early retirees.

The awareness and understanding of work and career opportunities in the disability sector amongst school students, education professionals and parents is limited.

Recommendations

- Develop and deliver a care and support career strategy targeted at school students to include:
 - Large scale offer of relevant VET courses in Years 11 and 12;
 - Address issues for students on placement to be signed off as competent by host organisations that don't have the necessary qualifications;
 - Professional development resources and events for education professionals on care and support work and career opportunities;
 - Content on access and inclusion across the curriculum; and
 - Resources and events on care and support careers targeted for both students and parents.
- Continuation and expansion of the Ageing and Disability Job Ready program and align benefits in aged care to disability. This program must be adequately funded to offer wrap-around case management supports to disadvantaged jobseekers through to the first months of employment.

1.4. Support to build a diverse and culturally secure workforce

Providers are keen to recruit more people with disability, increase diversity and ensure their workplace is culturally secure but often lack the resources. Making the workplace socially and culturally welcome will attract more workers and is beneficial for employee engagement and productivity.

Further investment in attracting and maintaining disability workers to the sector is also required. The low unemployment and skilled migration rates have altered the typical jobseeker profile in the disability sector, with organisations seeing larger numbers of applicants from culturally and linguistically diverse, low socio-economic or long-term unemployed backgrounds. Funding will be essential to assist many applicants from these cohorts to overcome barriers to enter to the sector.

Recommendations

- State Government investment to help build the capacity of service providers at a systemic level enabling inclusive design that increases diversity and provides a culturally secure service and workplace.
- Investment in employment and training programs to engage potential underutilised workforce cohorts to work in disability careers with agreed frameworks and risk controls in place to support their success.
- Address DRC recommendations for First Nations people to help create culturally secure and safe services increasing employment of First Nations people in the disability workforce.
- Expand the ACCO strategy to encompass disability in partnership with NDS and the disability sector.

1.5. Investment in Innovative Technologies

Western Australia is a vast state, leaving many people with disabilities in regional, rural, and remote areas with limited access to support services. The sector is keen to look at integrating care delivery strategies with more innovative technology to overcome geographic barriers in engaging skilled staff. Developments in Augmented and Virtual Reality AR/VR technologies for therapy, rehabilitation, and skill development, will have potential benefits particularly for individuals with cognitive or motor impairments.

Organisations such as Silver Chain are already leading the way using wireless video technology to deliver specific nursing services to clients in their own home through a virtual hospital.

Recommendations

- NDIA and State Government explore the use of innovative technologies, such as smart goggles, and provide equipment and training to overcome geographic barriers in engaging skilled staff.
- Better utilisation of the State Government funded disability training centres alongside the jobs and skills centres.

1.6. Alternate and shared housing schemes for workers

The housing crisis in Western Australia continues with elevated costs and lack of supply of both rentals and properties to purchase. Regional worker shortages are further impacted by the housing crisis, with workers who are available and willing to relocate having nowhere to live. Support to foster shared housing for disability workers would potentially help overcome housing cost issues for individuals.

Recommendation

- State Government to explore and invest in alternate housing schemes, such as communal accommodation, for support workers in regional, rural, and remote WA.



Priority 2: Improving the Effectiveness of the NDIS

The National Disability Insurance Scheme (NDIS) has already begun to significantly transform the lives of many people with disabilities. However, any undertaking as ambitious as the NDIS is bound to encounter challenges in both design and implementation.

While the sector wholeheartedly embraces the potential for foundational reform presented by the NDIS Review, there is apprehension about repeating the design mistakes of the past, marked by years of constant flux. The proposed solution, advocated by NDS, is to keep the approach straightforward and draw upon the invaluable insights and leadership of participants, providers, and the sector at large to safeguard the NDIS for the future.

Following extensive consultations with disability service providers in WA and a review of current policies and data, the following strategies have been developed aimed at enhancing outcomes for participants and ensuring the long-term financial viability of services:

- To address the ongoing quality and safeguarding challenges, that include the financial and quality impact of staff turnover and expansion of regulatory demands, further investment is needed. The NDIS Quality and Safeguards Sector Readiness Project is well positioned to continue strengthening providers in WA;
- Establishment of a sector-led NDIS Reform Implementation Taskforce in WA;
- Assurance of provider viability and the delivery of high-quality supports through the adoption of best practice pricing facilitated by an independent pricing mechanism to increase value for money, ensure security and continuity of supports and incentivises quality and links to the objectives of the NDIS;
- Exploration by the State Government of solutions to address the escalating costs of insurance and the lack of suitable insurance products to prevent market failure;
- Provision of top-tier disability services via standardized quality and safeguarding compliance requirements for all supports;
- Embed the Restrictive Practice (RP) policy and build capacity around balancing RP and choice / control; and
- Enhancement of outcomes for children and their families through the redesign of NDIS access, planning, and pricing to enable early engagement and promote best practices with strong State Government advocacy required.

2.1. Implementation leadership and co-design

After years of making incremental adjustments to the NDIS, the sector finds itself stretched to its limits. Providers express the need for stability, seeking relief from the burden of adapting to frequent system changes without adequate lead-in times or practical guidance to inform their processes. It is evident that some fundamental

changes are imperative. However, achieving enduring improvements to the NDIS hinges on the sector's capacity and capability. The collaborative endeavour of co-designing the implementation roadmap is paramount.

Recommendation

- The design and implementation of reforms to be spearheaded by a sector-led NDIS Reform Implementation Taskforce, underpinned by funding to establish the Taskforce, and bolstered by an Industry Transformation Fund. This approach ensures a unified and strategic effort towards the continued success and sustainability of the NDIS.

2.2. Best Practice Pricing

Viability is a major concern for the sector. NDIS pricing needs to reflect the operational realities of delivering the scheme and encompass the actual costs of services including compliance, human resources, wages, insurances, auditing, transport, and IT/digital costs. At the same time Scheme sustainability is under threat.

In a July 2023 NDS Pulse Survey, 83% of providers had concerns regarding their ability to deliver disability services using the new price limits with many predicting a loss for the 2023 - 2024 financial year.

Participant plans often do not meet participant needs, adequately account for complexity, or use evidence of best practice supports as a basis for decision making. Insufficient SIL funding creates quality and safeguarding challenges to delivering the necessary supports, placing participants and providers at risk.

The current pricing structure set by the NDIA for the provision of high intensity supports, and the necessary training for support workers, is insufficient and risks the ongoing delivery of high-quality care. Many providers feel they are being forced out of delivering high intensity supports as they are not financially sustainable.

In addition, service providers are at financial risk continuing to deliver supports while participants plans are being renewed or modified. In some cases, providers are required to increase their support levels to ensure the safety of the participants pending a change of circumstances outcome.

Recommendations

- State Government to support the development of holistic and targeted planning and support pathways to increase decision making transparency and provide guidance to participants, planners, intermediaries, and providers. These pathways should increase understanding of evidence-based and good practice and drive better information and access to services in line with participant goals, preferences, individual and Scheme outcomes.
- Adopt a best practice approach to pricing that identifies opportunities to increase value for money, ensure security and continuity of supports, incentivises quality

and links to the objectives of the NDIS. This approach should be implemented by an independent pricing mechanism such as an Independent Pricing Authority.

2.3. Insurance

WA providers continue to have difficulties obtaining insurance cover ranging from: property; public liability; cyber security; vehicle; workers compensation; physical and sexual abuse (PSA); and the cost of insurance has risen.

In a July 2023 NDS Pulse Survey, 32% of respondents had trouble accessing insurance required to run their disability services in the last 12 months. There are a limited number of insurers that are willing to provide PSA coverage and there are signs of market failure for PSA insurance due to a reduced risk appetite by insurers. This will impact providers who provide individualised Out of Home Care (accommodation) services in settings other than Group Homes (i.e. 1 on 1 SIL and ILO).

Recommendation

- The State Government expands their solutions identification to the rising costs of insurance and lack of suitable insurance products, such as increased funding through participant packages for registered providers or subsidies to obtain insurance.

2.4. Quality of Disability Services

Current market entry settings need resetting to drive quality and ensure that providers are accountable to participants, governments, and the community for the supports that they are delivering. However, a significant proportion of the sector is subject to minimal oversight. There is a need for uniform regulation requirements and practices across the care and support economy and between federal, state and territory governments.

Through the WA State Disability Strategy, the State has an important role in sector stewardship and NDS plays a vital support role to the sector through its highly effective Quality and Safeguards Sector Readiness Project. With an established reputation and reach, investment to further develop the Project into a stable program is essential for the sustainability of the sector in WA.

Recommendations

- The DRC recommendations will have direct impact on the quality and safeguarding expectations and requirements of the WA sector. The sector is clear more support is needed. The NDIS Quality and Safeguards Sector Readiness Project is well positioned to identify and implement a long-term pathway of supports for the WA sector. With an existing team in place, investment to further develop the Project into a stable program is essential for the sustainability of the sector in WA.

- Develop a new quality and safeguarding framework that embeds minimum standards for all supports and greater oversight for supports where there is a greater risk to participant safeguarding. The new framework should be supported by pricing, payment and other measures that recognise providers who are committed and taking action to continuously improve their services.
- Reforms to the WA Disability Services Act will require strong sector stewardship by the State Government.

Current pricing and payment mechanisms have resulted in a transactional approach to service delivery and are not driving quality or supporting outcomes. Incentives across all stakeholders are not aligned.

Recommendations

- Pilot targeted, blended approaches to payment reform in those areas (for example early childhood supports) where there is greater potential for innovation and improved outcomes. Payment approaches that include performance metrics focused on service navigation and support coordination functions could be considered in the medium term.
- The State Office of Disability work closely with NDIS to pilot and have an action learning research approach to inform what works well in regional, rural, and remote settings.

2.5. A Redesigned NDIS for Children, Young People and Families

The current system is not providing good outcomes for children and their families. There has been a move away from models that support children and families in ways that build their capacity. As a result, the NDIS has become the only option available.

Recommendation

- Redesign access, planning and pricing to engage children and families early, promote best practice early childhood support and help all families know what they need and how to find it. This redesign must also provide seamless wrap-around support and integrate with critical systems such as education which will require State Government support.

Priority 3: Building Accessible Communities and Participation

The State Government must continue to enhance social and economic inclusion for people with disability in our community. Efforts are needed to improve collaboration between mainstream services and ensure the State's efforts towards inclusive community outcomes for people with disability remain strong, both within and outside the NDIS.

Following extensive consultations with disability service providers in WA and a review of current policies and data, the following strategies have been developed to support building accessible communities and participation and address issues in health, housing, justice, and education:

- A connected ecosystem of support and improved government interfaces;
- Shared State and Commonwealth responsibility for the implementation of the Information, Linkages and Capacity Building (ILC) program, ensuring WA receives ILC funding and that programs are implemented in partnership with the State;
- Increased resources to improve the outcomes of the State Disability Strategy (SDS);
- Continue to fund NDS to deliver the ACROD and Companion Card Programs and promotion of the Changing Places program.
- Increased accountability for public authorities in improving governance in WA in line with the review of the Disability Services Act which includes the implementation of Disability Access and Inclusion Plans (DAIPs);
- Inclusive design in service provision;
- Pathways to improved accessible home and living supports and the development of a State Disability Housing Action Plan;
- Accessible public and on-demand transport; and
- Focus on improved employment outcomes for people with disability.

3.1. Connected Ecosystem of Support

About 93% of disability support is funded via the NDIS, yet of the 4.4 million people with a disability in Australia, only a small proportion will receive funding support through the NDIS. In WA, only 11.65% of people with disability receive NDIS funding. Supports and services outside the NDIS do not meet the needs of many people with disability. This has resulted in inequity and the NDIS as being seen as the only option available.

The issues of access to equitable health services, inclusive education, justice, employment, and affordable, accessible housing continue to be raised as persistent and complex challenges that must be addressed. There must be increased focus and

investment in access to mainstream services within the strategic plans and budgets for the governments departments providing these services.

Recommendation

- Develop an intergovernmental strategy that supports seamless transitions across support systems. This strategy should clarify responsibilities and enable shared funding mechanisms so that participants and providers are not in the position of having to navigate who pays for the broad range of services required.

Augmentation of the Information, Linkages and Capacity Building (ILC) program is required. The ILC program allocates grant funding annually for projects that aim to build the knowledge, skills, and confidence of people with disability, and improve their access to community and mainstream services. It is expected approximately 185M in ILC grant funding will be available for 2024 – 2025.

At present, the Australian Government Department of Social Services (DSS) oversees the funding for the ILC grants program, with state and territory governments complementing this through their strategies and funds. In WA, the Office of Disability oversees A Western Australia for Everyone: State Disability Strategy 2020-2030 and the associated Action Plan with funding for access and inclusion initiatives.

Sector consultation revealed providers believe the State should play a more active and robust role alongside the Commonwealth in the ILC Program. This would enable initiatives to be based in local communities and tailored to their specific needs.

Recommendations

- Move to a joint commissioning model between State and Federal governments for the ILC program. This would enable local place-based initiatives that are co-designed and prioritise collaboration, transparency, and deliver services that are tailored to meet the unique needs and strengths of each community.
- Effective collaboration with local communities and service providers in regional, rural, and remote areas is essential. Without their knowledge and understanding, State based mainstream service delivery systems will not be maximised to improve outcomes for people with disability.

The review of the Disability Services Act 1993 provides an important opportunity to update and embed in legislation the State Government's continuing support and investment in improving the lives of people with disability in WA and to fulfil its obligations to implement the State Disability Strategy.

Recommendations

- The Office of Disability should be well-resourced to support its leadership role in innovation and local decision making, enabling effective implementation, monitoring and accountability of the State Disability Strategy and effective stewardship. Careful stewardship is required to ensure people with disability get the support and services they require given the economic impact of the NDIS Bilateral Agreement.

- A significant increase in funding is required to improve the outcomes of the State Disability Strategy (SDS) to enable transformative change and provide equitable opportunities across the 18 priority areas for the 411,500 people in WA with disability.

Minimum standards for inclusive practices are legislated in WA through the Disability Services Act 1993 (currently being reformed) which requires public authorities to develop a Disability Access and Inclusion Plan (DAIP) and report on its progress each year. DAIPs are an important way of ensuring that State Government agencies and local governments continue to improve access and inclusion outcomes for people with disability. There are concerns that the quality and effectiveness of DAIPs varies between public authorities prompting a call for the State to institute measures to guarantee accountability.

Recommendation

- Improved accountability for public authorities in improving governance in WA in line with the review of the Disability Services Act. Implementation of DAIPs should be evidence based and audited against best practice standards to ensure accountability, transparency and improved outcomes by public authorities.

3.2. Community Access and Participation

The ACROD Parking Program provides support to access the community for Western Australians who have a severe mobility restriction or who are legally blind. During 2022-2023 NDS issued a total of 56,724 ACROD permits, with 99,418 permits in circulation as of 30 June 2023.

The Companion Card program, administered by NDS, supports Western Australians with a significant and permanent disability who require attendant care support to participate at community venues and events. During 2022-2023 NDS issued 5534 Companion Cards, with 23,011 cards in circulation as of 30 June 2023.

Recommendation

- Continue to fund NDS to deliver the ACROD and Companion Card Programs and promotion of the Changing Places Program.

3.3. Inclusive design in service provision

There is significant investment being made by service providers to build the capacity of communities and offer meaningful opportunities for people with disability.

Actively including people with disability and families in decision making at all levels within an organisation and supporting people to participate in their chosen communities requires resources and support from the State Government.

Positive practices for inclusive governance should include a meaningful level of representation by people with disability as board directors, leaders, managers, and

advisors. Formal committees that include participants and their support networks provide the opportunity for input into the design and delivery of services.

Recommendation

- State Government funded NDS skills and training programs that help build the capacity of service providers, people with disability, carers, and families to enable positive practices for inclusive governance.

3.4. A pathway to better home and living supports

NDIS participants require housing options that are affordable and accessible. Some participants also require support to live independently. Home and living supports are not meeting many participants needs: existing housing stock is ageing, non-specialist disability accommodation options are limited, and groups of participants are seeking different models of support. Providers want to work with participants to co-design responsive support models, but this takes time and resources.

Recommendations

- The establishment of a WA Disability Housing Action Plan with urgent resource allocation.
- Undertake a project co-designed with participants and providers to develop a 5–15 year pathway to better home and living supports. The pathway needs to address current issues and recommendations of the DRC. A strategy is required to manage and redevelop ageing stock and support participants to explore, navigate and transition to home and living environments that meet their needs, addressing the issue that SDA is only for a limited number of NDIS participants.

Housing options in regional, rural and remote areas are at a crisis point with investors withdrawing commitments to construct Specialist Disability Accommodation (SDA) housing due to the elevated risks and high construction expenses.

Recommendation

- The NDIA, in collaboration with the State Government, needs to significantly boost investment by creating incentives and subsidies that encourage the development of SDA housing.

3.5. Accessible public and on-demand transport

Access to a range of public and private transport options is essential for people with disability to achieve full social and economic participation in the community.

One in four people with disability over the age of five have difficulty using public transport or are unable to do so. For 14% of people with disability public transport remains unavailable in their local area, particularly for those living in regional, rural, and remote WA.

For example, the regional town of Broome has no accessible taxis impacting both residents and tourists. People with disability face challenges traveling from the airport to their accommodation and accessing various facilities in the town.

NDS supports the State Disability Strategy (SDS) aim for a greater variety of accessible transport options to be available for people with disability. Although the existing SDS Second Action Plan outlines steps to promote inclusivity and accessibility in public transportation, there is still a pressing need to increase the availability of accessible on-demand transport options such as taxi and ridesharing services in regional, rural, and remote areas.

Recommendation

- The State Government boost funding and expand the Regional Wheelchair Accessible Vehicle Taxi Service Grant Scheme which aims to encourage and support the provision of wheelchair accessible taxi services in regional Western Australia. Particular focus should be on supporting the establishment of new taxi services in areas where none exist.

3.6. A focus on employment outcomes

Poor employment outcomes continue for many people with disability. Employment is not prioritised in participant plans and some participants need support to identify, explore and try a range of employment options.

Recommendation

- Work with all stakeholders to develop a cohesive vision for employment that brings together the range of existing supports available, improves how they work together, identifies gaps, develops strategies to address these gaps and supports a range of employment options for all people with disability.

NDS commends the State Government's [People with Disability Action Plan to Improve WA Public Sector Employment Outcomes 2020–2025](#) which aims to increase the representation of people with disability employed in the public sector to 5% and support inclusive work environments.

NDS consultations found disability service providers want the public sector to be more accountable and provide regular data on employment numbers of people with disability in the public sector. Monitoring of data can be a way of shifting the dial on diversity and inclusion of people with disability.

Recommendation

- State Government collect data on the number of people with disability employed in each public sector department, sharing this data publicly and the inclusive policies and practices that have created more equitable and accessible workplaces.

Priority 4: Adapting to further reforms

The disability landscape is fluid with imminent transformational changes coming as a result of the NDIS Review and Disability Royal Commission 222 recommendations. Initiatives will need to be developed to build a strong disability eco-system to adapt and respond to the DRC and NDIS Review optimising services and supports for the 411,500 people with disability, their families, carers, and workers.

The establishment of a WA DRC and NDIS Review implementation taskforce co-designed with sector representatives, carers, and people with disability will help ensure people are safe and get the supports they need. Once there are known actions, NDS will undertake significant work to support providers to understand changes and assist in the implementation of requirements. This potentially requires NDS and providers to develop new strategies and reprioritise initiatives and recommendations outlined in this submission.

Conclusion

The Western Australian State Government's support for the disability sector has been greatly appreciated and ongoing funding of NDS programs including Core Services, ACROD Parking, Companion Card, JMS and Quality and Safeguards Sector Readiness is essential.

Expanded support and collaboration is vitally important as the sector navigates significant imminent change from the NDIS Review and the Disability Royal Commission. NDS is seeking funding from the Western Australian Government to continue its shared commitment to sector stewardship which enables ongoing support for the disability sector as it navigates major reforms. NDS is also advocating for ongoing Western Australian Government initiatives with long term funding to make this State truly inclusive for all people with disability.