

Submission  
No 191

**INQUIRY INTO IMPLEMENTATION OF THE NATIONAL  
DISABILITY INSURANCE SCHEME AND THE PROVISION  
OF DISABILITY SERVICES IN NEW SOUTH WALES**

**Organisation:** Physical Disability Council of NSW

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**Physical Disability Council of NSW**  
Ordinary People Ordinary Lives

Submission for Portfolio Committee No.2  
Health and Community Services

Inquiry into the implementation of the National Disability  
Insurance Scheme and the provision of disability services in New  
South Wales

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## **Who is the Physical Disability Council of NSW?**

The Physical Disability Council of NSW (PDCN) is the peak body representing people with physical disabilities across New South Wales. This includes people with a range of physical disability issues, from young children and their representatives to aged people, who are from a wide range of socio-economic circumstances and live in metropolitan, rural and regional areas of NSW.

Our core function is to influence and advocate for the achievement of systemic change to ensure the rights of all people with a physical disability are improved and upheld.

The objectives of PDCN are:

- To educate, inform and assist people with physical disabilities in NSW about the range of services, structure and programs available that enable their full participation, equality of opportunity and equality of citizenship.
- To develop the capacity of people with physical disability in NSW to identify their own goals, and the confidence to develop a pathway to achieving their goals (i.e.: self-advocate).
- To educate and inform stakeholders (i.e.: about the needs of people with a physical disability) so they are able to achieve and maintain full participation, equality of opportunity and equality of citizenship.

### **Introduction:**

The Physical Disability Council of NSW (PDCN) appreciates the opportunity to provide feedback to Portfolio Committee No.2 - Health and Community Services on the inquiry into the implementation of the National Disability Insurance Scheme (NDIS) and the provision of disability services in New South Wales. In this submission PDCN will provide comment on the roll out of the NDIS in relation to the terms of reference. PDCN will also address the issues created by future funding arrangements for advocacy and peak representative organisations.

The following submission will be separated to reflect the terms of reference.

### **a) the implementation of the National Disability Insurance Scheme and its success or otherwise in providing choice and control for people with disability**

The NDIS is one of the most important social reforms in Australian history and when fully implemented will provide individually funded support to an estimated 460,000 Australians with disability. It is expected many more people with disability will also benefit from enhanced community inclusion supported by the Information, linkages and capacity building element of the scheme. At its foundation the NDIS seeks to provide participants and their families greater choice

and control over the disability supports they receive. Given the scale of the transition to the NDIS the implementation of the scheme has not been without significant challenges.

Alongside the implementation of the NDIS, ensuring federal, state and territory governments meet the goals and objectives of the National Disability Strategy 2010-2020 (NDS) is essential to achieving access and inclusion for people with disabilities. The choice and control NDIS participants have when executing their plans is limited by the accessibility of the community including access to transport, education, employment, housing and health services. Furthermore, as many individuals with disability in NSW will not be eligible for individualised funding through the NDIS, the strategy is crucial to improve access to mainstream support services for all people with disability and ensure that barriers to full inclusion and participation in the NSW community are addressed and removed.

PDCN members have consistently reported an absence of locally available services or having their choice limited to the only one disability service provider as a significant issue outside of metropolitan areas. NDIS participants in rural and remote NSW have reported difficulty in sourcing suitable support services and skilled workers, restricting the effectiveness and flexibility of their NDIS plans. Relatedly, the NDIS must consider the added cost to services when they include substantial travel distances. Service providers have less incentive to enter rural and regional markets if these additional expenses are not fully accounted for in NDIS price guidelines.

PDCN acknowledge that the NDIS has set varying price guides for remote and very remote areas to assist with these costs, however it is understood that they then use a guide that would consider an area like Broken Hill to fall into a more metropolitan price line, meaning that services providing work to very remote areas such as Wilcannia from Broken Hill are not able to access very remote cost structures to cover the significant travel costs involved. In many cases this means provision of services costs more than the amount they would be paid, so a decision is made not to offer the service at all.

PDCN has also observed the choice and control of NDIS participants being compromised by having insufficient support and information available to implement their NDIS plan. PDCN acknowledges that undertaking planning with an NDIS participant is a complex process that requires a high degree of skill and time to complete effectively, and that due to the short time frame in which 140,000 people with disability were to be onboarded into the scheme in NSW in order to meet scheduled deadlines, Local Area Coordinators (LACs) have also struggled to be able to find sufficient time to comprehensively plan with participants, and are rarely able to commit to the second half of their role, being assisting new entrants with the implementation of plans once received.

The effective delivery of the NDIS has been impacted by LACs not having the resources to assist NDIS participants to understand and implement their plans. PDCN has observed many participants who were in possession of their NDIS plan for several months before utilising any of their funding. PDCN believes this is due to a lack of guidance from LACs combined with

participants' limited understanding of the plan itself; specifically the difference between core, capital and capacity building supports, plan management options and how supports can be purchased through the NDIS portal.

This matter has been further exacerbated by NDIS participants not receiving necessary funding for support coordination or funding being inadequate to meet their needs. Support coordination is a capacity building support an NDIS participant may receive to assist with implementing and monitoring the supports in their plan. A support coordinator can assist a participant to understand their service options, negotiate with service providers, arrange assessments or to link to mainstream or community services (i.e. housing, education, transport, health).

If an NDIS participant has complex support needs and requires this level of assistance they are eligible to receive funding for support coordination. PDCN feels this has not been clearly communicated by LACs during planning conversations, with reports that individuals have been told they will only be able to receive funding for plan management or support coordination. This has led to NDIS participants who are not receiving support coordination yet also not having the skills or support that would be essential to use their individualised funding.

Additionally, whilst the cohort of whom PDCN represent, those with physical disabilities, may well be seen as some of the most capable and likely to understand and manage their plans, conversations with our members highlights the fact that the NDIS is a new and unknown scheme for ALL participants, and even those whom are intelligent, highly functioning individuals are requiring support in order to understand and navigate this new regime, and would benefit from a small amount of time limited support coordination.

Furthermore, PDCN has received reports of LACs not utilising person centre practice when working with participants due to time and staffing constraints. PDCN stakeholders have reported being allocated a support co-ordinator or a disability service provider (while agency managed) by a LAC without consultation. This limits individual's autonomy and, in many cases, further confused the participant. PDCN recommends LACs support participants to navigate the system in a style that maximises their choice and control.

**Recommendation 1 - Ensure the NSW government set targets to meet the actions and objectives of the National Disability Strategy.**

**Recommendation 2 - Consider innovation in NDIS employment arrangements in remote areas. As an interim solution where services are not available, the NDIS could consider payment for adequately trained family and carers to provide these services (where this would not be a normal family member duty.)**

**Recommendation 3 - Increase funding to LACs to assist participants to implement plans following initial plan completion or allow for funding within plans for individuals to pay others to assist in plan implementation.**

**b) The experience of people with complex care and support needs in developing, enacting and reviewing NDIS plans.**

PDCN has observed issues with the consistency of initial NDIS plans received by participants as the NDIS roll out has occurred across New South Wales. Through our capacity building programs PDCN has followed several NDIS participants from pre-planning to plan implementation. In PDCN's opinion the variation in the outcome of initial plans, including the allocation of reasonable and necessary supports is mainly due to the competency of planners and the time and resources allocated for planning.

NDIS participants have reported planners having insufficient disability knowledge and lacking the skills and experience needed to navigate planning conversations that cover all possible support needs under the NDIS. The experience and outcome of planning conversations has been less successful where participants have high support needs or require complex care, such as individuals with multiple disabilities including psychosocial disability. In many cases PDCN has found that planning conversations have not been arranged to allow equal access for individuals with specific communication needs.

Additionally, the mode of planning meetings must be carefully considered as this has a significant impact on the quality of participants initial plans. In the early stages of the NDIS roll out in NSW several participants reported to PDCN that their planning meetings were conducted over the phone.

PDCN feels face to face interviews are more appropriate for most participants, especially those with complex support needs as phone conversations will not be sufficient in determining reasonable and necessary supports. Planning conversations are more successful when an individual's support network, including family members or support workers, is involved and the meeting allows for the sharing of important preparatory documents. Interviews conducted over the phone also prevent the planner from being about to utilise physical cues that would assist in thoroughly assessing an individuals need for supports and equipment. In addition, planning over the phone if conducted with a carer or family member rather than the person with disability is not person centred and undermines the participant's ownership of their plan.

The recent release of the NDIS pathways review in February 2018 has seen the National Disability Insurance Agency (NDIA) attempt to address many of the planning issues that have been experienced by NDIS participants, as mentioned above i.e. planning meetings being held over the phone, inconsistent planning experiences and NDIS representatives having a limited understanding about specific disabilities. PDCN would like to commend the NDIA on the extensive engagement undertaken with stakeholders to document and address these issues. At this stage PDCN feels it is too early to comment on the success of the new participant pathways but we are optimistic that the proposed changes will improve the experiences of NDIS participants.

PDCN has seen a large increase in enquiries regarding NDIS reviews and through providing individual support sessions have observed NDIS participants who require assistance to understand their first plan and prepare for their first plan review. The complexity of the NDIS appeals process and long wait times for plan reviews has been repeatedly stated as a challenge for participants. Currently if a participant identifies an unmet support need in their plan they must request a formal review (within a set time period) or wait until their annual plan review.

PDCN suggests implementing a more consultative process with greater liaison between participants and local area coordinators (LACs) would enable support gaps to be raised and comprehensively addressed during the construction of plans, making the planning process more efficient and reducing the overall number of plan reviews requested by NDIS participants, or where gaps are identified directly after receiving a plan, and can be easily addressed or identified as necessary, these changes can be made to a plan through simple conversation, rather than the process of a formal review. Again, PDCN is optimistic that that new participant pathway will make this process smoother for participants and with the opportunity to review plans prior to final sign off, will address many of the 'gaps' at this point, thereby reducing NDIS appeals.

**Recommendation 4: Local area coordinators provide greater education to NDIS participants or funding for support coordination to ensure people are supported to implement their NDIS plans.**

**Recommendation 5: All NDIS participants receive time limited support coordination to ensure they understand their plan and can navigate the process of retaining services.**

**Recommendation 6: Continue to fund independent advocacy organisations to assist NDIS participants with appeals and to provide NDIS Participants with greater support to prepare for plan reviews.**

#### **d) the effectiveness and impact of privatising government run disability services.**

PDCN is concerned that the privatisation of disability services and the closure of the Department of Ageing Disability and Home Care (ADHC) in NSW will leave people with disabilities who are currently receiving support from government run services in a vulnerable position. ADHC previously provided wraparound services including case management for individuals with complex care and support needs. This included providing additional support in circumstances where the client is facing crisis. The process under ADHC for securing additional funding or support to quickly address a crisis situation was straightforward and we are concerned this will not be replicated in the private market.

PDCN believes privatising government run disability services may make it more difficult for clients, particularly those with complex support needs to organise the supports they require. The funding arrangements under the NDIS have resulted in disability support providers being apprehensive about working with difficult or challenging clients, due to the costs involved and concerns about

receiving sufficient and timely funding. In many cases services are making a decision not to take on these clients, or types of services/supports. Although NDIS provider payments issues, including delays, will be addressed over time, it is essential to ensure it is financially viable for disability service providers to continue to provide supports to complex or challenging clients.

Furthermore, there are a lack of options for children and young people with challenging behaviours, especially suitable accommodation for those in out of home care. Accommodation options for individuals under the NDIS is limited to Specialist Disability Accommodation (SDA) which has rigorous eligibility criteria and will only be provided to 28 000 NDIS participants across Australia who require a specialist housing solution. PDCN suggests that the funding model proposed for robust housing, suitable for those with complex needs and challenging behaviours, under SDA will not be workable and will not provide sufficient market supply of this accommodation type. Investors may find that building robust accommodation is not financially worthwhile if the most profitable SDA type entails the cohabitation of multiple SDA funded participants.

In this situation, it is unreasonable for participants to live together due to their different and complex support needs and therefore this model may also be less appealing to investors due to the potential for substantial maintenance costs that may be necessary for the upkeep of the property if residents are disposed to destructive behaviour.

In addition, PDCN is concerned about a lack of accommodation options for individuals who, due to high support needs such as challenging behaviours, may find themselves removed from private SDA housing; and as the NSW Department of Ageing Disability and Home Care (ADHC) leaves this domain, may be left without a provider of last resort.

There are a significant number of people with disability in NSW who require accommodation assistance. NDIS participants who are not SDA eligible may be able to receive home modifications or assistive technology to adapt their current accommodation through their NDIS plan. However, PDCN would like to emphasise that ensuring the greater provision of accessible non-SDA housing remains the responsibility of the NSW state government.

**e) the provision of support services, including accommodation services, for people with disability regardless of whether they are eligible or ineligible to participate in the National Disability Insurance Scheme**

PDCN has observed that an inadequate supply of accessible and affordable housing in well serviced locations is a continual issue for people with disabilities. This is an issue in both the private market (both rental and home buyers) and social and affordable housing.

PDCN would like to emphasise that a socially just and inclusive community must have affordable housing choices for individuals on a range of incomes. Affordable housing is essential for people with disability as there is a strong correlation between disability and the incidence of poverty due



to the limited earnings of people in receipt of government benefits and people on part-time wages; and the additional expenses often associated with having a disability. In addition, people with disability may be further socio- economically disadvantaged by barriers to accessing employment, education and community services.

In NSW data has identified that people living in the most disadvantaged quintile of Sydney were 2.6 times as likely to have severe disability (2.9%) as people living in the most advantaged quintile (1.1%), when local areas were ranked according to their residents' average access to economic resources<sup>1</sup>. Currently the labour force participation rates of people with disabilities are significantly lower than the general population; 53.4% of the 2.1 million Australians with disability of working age were in the workplace or actively seeking work, compared to 83.2% for people with no disability<sup>2</sup>.

Additionally, we support the aim of increasing the supply of 'housing universally designed for people of all ages and abilities' as the inadequate provision of accessible public housing and accessible rental properties is consistently observed as an issue for people with disabilities. Unfortunately, it is known that a high proportion of public housing tenants have a disability<sup>3</sup>. PDCN members and stakeholders frequently report being unable to find a suitable rental property, living in subsidised housing that does not meet their access needs or being unable to afford to live independently of family despite receiving individualised supports through the NDIS.

PDCN believes the NSW state and local governments can increase the availability of functional and well-designed housing through planning and property levies for new developments and incentives for developers and designers to include features such as zero step entrances and wider doors in the initial design and construction of dwellings. Accessible design also future proofs housing for residents who may have declining mobility or experience disability as they age. To ensure greater accessibility across all building types, PDCN suggests the introduction of mandates for gold standard housing under Australian Livable Housing Design Guidelines to improve access to all homes across the board.

Due to the economic factors previously mentioned, people with disability are less likely to own their own home. Therefore, PDCN believes improving housing choice for renters, particularly long-term rental tenancy options are essential for people with disabilities, who may require home modifications to their rental property and for both economic and practical reasons securing a long-term rental is extremely desirable.

PDCN believes initiatives to increase housing affordability and to provide greater security to renters are an important step to guaranteeing a diversity of communities and to ensure individuals experiencing social and economic disadvantage are not relegated to fringe areas where they have less access to essential services, employment and transport.

**Recommendation 7: The implementation of mandated minimum standards of universal design for new dwellings and renovated properties. Furthermore, PDCN aligns itself with**

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<sup>1</sup> Australian Institute of Health and Welfare (2009) The geography of disability and economic disadvantage in Australian capital cities.

<sup>2</sup> Australian Bureau of Statistics (ABS), Survey of Disability, Ageing and Carers, 2015

<sup>3</sup> Australian Institute of Health and Welfare (2009) The geography of disability and economic disadvantage in Australian capital cities. Page v

**Australian Network for Universal Housing Design (ANUHD) assertion that this minimum standard should be Gold level or higher. This recommendation is also relevant in resolving long term availability of accessible housing.**

**Recommendation 8: The implementation of incentives for property developers and local governments to adhere to universal design standards.**

**Recommendation 9: Creation of policies to ensure available accessible housing is given as a priority to people with disability in the private market.**

**Recommendation 10: Increasing rental security through more tenant focused legislation (i.e. longer contracts).**

**Recommendation 11: Educate tenants on their rights regarding home modification on a rental property.**

**f) the adequacy of current regulations and oversight mechanisms in relation to disability service providers**

Prior to the conception of the NDIS Quality and Safeguarding Commission (NDIS Commission) the NSW Ombudsman performed the role of reviewing and setting standards for the delivery of disability services in NSW. The Ombudsman was also responsible for providing regulations and oversight mechanisms and handling and investigating complaints about disability services.

The progressive roll-out of the NDIS Commission has been timed to coincide with the NDIS reaching full implementation in each state and territory. In the case of NSW, the NDIS Commission assumed responsibility for quality and safeguarding on the 1st of July 2018. PDCN recommends greater publicity and the provision of clear information to ensure public awareness of the new process for reporting and the transition of responsibilities for safeguarding measures to the NDIS Commission.

PDCN supports the recommendations made by the Australian Human Rights Commission report 'A Future Without Violence' that current state regulations and oversight mechanisms should remain in place until the full transition to the NDIS to ensure there are no potential service gaps for people with disabilities<sup>4</sup>.

Where it is not the responsibility of the NDIS Quality and Safeguards Commission, (i.e. those areas of disability that will fall outside of the NDIS's remit, PDCN would also recommend that current oversight mechanisms remain in place in order to ensure all people with a disability are still assured access to complaints and safeguarding services to fit their needs.

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<sup>4</sup> Australian Human Rights Commission, 'A Future Without Violence: Quality, safeguarding and oversight to prevent and address violence against people with disability in institutional settings', June 2018

For all current and future safeguarding mechanisms we would also wish to see independence in their operations, and the ability to enforce required outcomes/changes where a service or structure is deemed not meeting required standards of service or conduct.

#### **g) workforce issues impacting on the delivery of disability services.**

PDCN feels the NDIA price guide for disability support work has significant consequences for the well-being of disability support workers and the quality of care provided to NDIS participants. Research conducted by the UNSW Social Policy Research Centre indicates that pricing arrangements are not “fully enabling disability support workers to deliver services which are personalised, coordinated, responsive or safe”<sup>5</sup>.

The current NDIS pricing for disability support work is based on direct hours of support provided to the participant, and does not allow for staff training and development, ongoing supervision and support of workers, staff meetings, care coordination and the completion of administration tasks such as making detailed client notes (essential for consistency of care). Combined with the increasing casualisation of the disability workforce PDCN is concerned about a decline in the quality of services received by NDIS participants. PDCN can state that in some regions service providers have decided to not register to work within the NDIS, due to concerns over the low pay levels.

In addition, PDCN believes there is a significant knowledge deficit amongst disability service providers on how best to support clients to transition to the NDIS, including providing accurate advice when forming service agreements and in the delivery of support coordination to eligible clients.

**Recommendation 12: NDIS prices be adjusted to ensure they cover the full cost of disability service provision and support quality service delivery.**

#### **h) challenges facing disability service providers and their sustainability**

The transition away from block funding has created operational challenges for disability service providers. The NDIS enables participants with individually funded supports to exercise choice and control over who delivers their support services. This includes the ability to employ multiple service providers, control over the specific staff assisting them and the hours and time of day support is delivered. The challenges for service providers primarily relate to staffing arrangements and rostering, with many providers employing greater numbers of casual staff to meet the demand for flexible services. PDCN is apprehensive about the greater casualisation of the workforce as this may increase the potential for clients to be left without essential support services if a disability support worker cancels a shift with short notice.

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<sup>5</sup> UNSW Social Policy Research Centre, Cortis, N., McDonald, F., Davidson, B., Bentham, E., ‘Reasonable, necessary and values: Pricing disability services for quality support and decent jobs’, June 2017

In addition, the roll out of the NDIS has been marred by considerable teething problems with the provider payment system creating financial instability for disability support organisations. These issues combined with an NDIA price guide that undermines the financial viability of services, by not adequately covering staffing, administration and training expenses, makes it difficult to operate sustainably in the NDIS landscape.

**i) incidents where inadequate disability supports result in greater strain on other community services, such as justice and health services**

PDCN has observed the lack of support services for individuals with psychosocial disability placing strain on health services. Inadequate mental health services result in individuals presenting to emergency rooms when they are in crisis rather than receiving appropriate supports earlier. This is particularly common in rural and regional areas where there is a lack of psychiatric nurses and often fragmented mental health services and facilities. Many individuals with significant and ongoing psychosocial disability will not be eligible for the NDIS and will continue to require state funded mental health services.

**j) policies, regulation and oversight mechanisms that could improve the provision and accessibility of disability services across New South Wales**

PDCN believes continued funding for advocacy organisations will play a key role in ensuring the NDIS and the NDS achieve their objectives. The non-profit sector, including both independent individual and systemic advocacy organisations should play an important role in providing advice and direct feedback from people with disabilities on where systemic changes should be made and the impact government policies have on the lives of people with disabilities. In addition, making gains in all policy areas of the NDS is crucial for true inclusion of people with disability in NSW and as stated in the NDS second implementation plan, “advocacy organisations are well placed to contribute to the ongoing monitoring and evaluation of the strategy<sup>6</sup>.”

**k) any other related matter**

**Funding for advocacy and peak representational organisations**

The future funding of peak bodies and disability representative organisations in NSW is uncertain and PDCN believes that this will have a direct impact on both the NDIS and the provision of all disability services in New South Wales.

Funding for disability advocacy in NSW was set to expire on June 30th, 2018, with all NSW funding for disability advocacy, information and representative organisations being transferred to fund the NDIS. Following an extensive campaign from the NSW Disability Advocacy Alliance, a collective of over 20 disability advocacy organisations the NSW state government committed to two years of transitional funding through to complete roll out of the NDIS. In addition,

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<sup>6</sup> Commonwealth of Australia, National Disability Strategy 2010- 2020 Second Implementation Plan, Driving Action 2015-1018, p17

following a review, the current funding under the National Disability Advocacy Program (NDAP) has been guaranteed until 30 June 2020, but only to the organisations currently funded within this program, and with no monetary increase.

PDCN believes continued funding for peak organisations to provide systemic advocacy, independent information and representation for people living with disability in New South Wales is essential to meet the objectives of the NDIS, particularly in addressing policy and systems changes that will enable those receiving NDIS funding, and those whom will not, better engage as fully equal, participating members of society – the premise on which the NDIS is built.

The Disability Reform Council has the responsibility of providing advice to the Council for Australian Governments (COAG) on policy issues relevant to the roll out of the full scheme including future advocacy arrangements. COAG seeks to ensure that alongside the roll out of the NDIS the policy outcomes of the National Disability Strategy (NDS) are upheld. The National Disability Strategy has made a commitment to advocacy in line with their second policy outcome area, ensuring that people with disability have their rights promoted, upheld and protected<sup>7</sup>. The NDS states “disability advocacy services enable and support people with disability to safeguard their rights and overcome barriers that impact on their ability to participate in the community”<sup>8</sup>.

The council will also advise COAG on policy matters as they relate to the NDIS Act. As outlined in the Act, its general principles guiding action supports the continued work of disability representative organisations, such as PDCN. The Act recognises that the inherent knowledge and lived experience of people with disabilities should be acknowledged and respected<sup>9</sup>. Systemic advocacy undertaken by peak bodies such as PDCN, ensures the inclusion and full participation of people with disabilities in society by identifying and addressing issues on a larger scale than is possible with individual advocacy, or at times by an individual alone.

Additionally, hundreds of years’ worth of expertise, community knowledge and advice to government and collaborative relationships will be lost should these organisations no longer be funded. As is the case in this submission, Government processes frequently rely on representative organisations for feedback, comment and direction (i.e. progress reports/submissions) or even access to their individual members with disability for expertise/lived experience.

The ongoing modification and growth of the NDIS requires consultation with stakeholders to pre-emptively address systemic issues. NDIS participants will not be able to fully realise the tenets of choice and control if there are barriers to their full inclusion in society.

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<sup>7</sup> Commonwealth of Australia, National Disability Strategy 2010- 2020, page 40

<sup>8</sup> Ibid, page 40

<sup>9</sup> Australian Government, National Disability Insurance Scheme Act, 2013, part 2- Objects and Principals.

Much of the work our organisations undertake and supports falls outside of the remit of the NDIS, and includes state-based issues across the broader mainstreams arena of education, employment, health, access, finance, justice and human rights.

In addition, PDCN is concerned about the lack of support available to assist participants to understand and navigate the changes as they move onto the scheme. If advocacy is only available on a user pays basis through individualised NDIS plans, those with insufficient funding or without individual funded supports (IFS) who are only accessing Information, Linkages and Capacity building programs will not be able to access advocacy services.

It is important to note that this funding loss will occur not only in NSW but in other States and Territories as they too fully implement the NDIS within their own jurisdictions. The introduction of the NSW Quality and Safeguarding framework as part of the NDIS will also need to be tested as it is rolled out to ensure that it meets its objectives and issues are identified and addressed. Without funding for advocacy organisations there will be an absence of independent safeguards to ensure that people with disabilities can access the systems of support provided under the framework.

Furthermore, individual and systemic advocacy play an important role in supporting both NDIS participants and people with disability not eligible for an NDIS package. As the majority of individuals receiving IFS under the NDIS (approximately 62%<sup>10</sup>) are people with intellectual disabilities state funded advocacy organisations to represent and promote the interest of all people with disability is critical for the cohort PDCN represents.

People with physical disabilities are often underrepresented as consumers of disability specific services but their full inclusion in the community is obstructed by barriers to the physical environment, transport, education, employment, health and other mainstream services. The NSW government must guarantee the aims and objectives of the National Disability Strategy are achieved, to ensure people with disabilities have access to mainstream services on an equal basis to all other members of the community.

As examples, PDCN has worked in partnership with NSW Roads and Maritime Services, the Sydney Harbour Foreshore Committee, local councils and other government experts to bring about the construction of lifts for step free access, to the Sydney Harbour bridge (due to open in October 2018.) We have championed the introduction of height adjustable beds in all NSW registered GP services, again partnering with NSW Ministry of Health and the RACGP to do so.

When many of our members were struggling with Enable NSW, a government provider of equipment for people with disability, experiencing incredibly long delays on provision, and difficulty understanding documentation processes, we sought to work with this government body to collaborate on ways to reduce timeframes and better address issues and documentation –

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<sup>10</sup> National Disability Insurance Agency, NSW Participants Public Dashboard, 31<sup>st</sup> March 2018, <https://www.ndis.gov.au/medias/documents/dashboard-nsw-mar-18-pdf/dashboard-nsw-march-18-pdf.pdf>

providing advice and cost effective solutions across a whole system (rather than government dealing with many individual complaints over and over again.)

In addition, PDCN sits on over 20 government advisory groups providing advice and expertise. All these initiatives are those which do not fit within the NDIS remit, relate to external state based departmental issues, and should not be a burden on the NDIS's already limited resources.

**Recommendation : Ensure the NSW state government continues to fully fund independent advocacy information and peak representation services following the complete transition to the NDIS.**