Carers Australia

Submission to the Productivity Commission Issues Paper on the National Disability Agreement (NDA) Review

August 2018

About Carers Australia

Carers Australia is the national peak body representing the diversity of Australians who provide unpaid care and support to family members and friends with a:

- disability
- chronic condition
- mental illness or disorder
- drug or alcohol problem
- terminal illness
- or who are frail aged

Carers Australia believes all carers, regardless of their cultural and linguistic differences, age, disability, religion, socioeconomic status, gender identification and geographical location should have the same rights, choices and opportunities as other Australians.

They should be able to enjoy optimum health, social and economic wellbeing and participate in family, social and community life, employment and education.

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Introductory Comments

Carers Australia acknowledges that there is a need to review the terms of the 2012 National Disability Agreement in order to reflect changes in the delivery of disability services resulting from the introduction of the National Disability Insurance Scheme (NDIS).

We support the development of a new, binding agreement between the national and state and territory governments which would commit them to the implementation of policies and programs to improve outcomes for people with disability and their carers within their jurisdictions.

However, whether this takes the form of a revised COAG agreement when we have a more robust document in the National Disability Strategy, has been a source of some pondering. This is especially so since the last COAG performance review released in 2016 showed very little progress across most Agreements, including the National Disability Agreement.[1]

However, on balance, we are of the view that there is room for both a new, high level agreement to update the 2012 COAG National Disability Agreement and the more detailed and robust National Disability Strategy.

Our particular concern is that a new agreement (and the Strategy) must address gaps in services for both people with disabilities and their carers that have arisen with the introduction of the NDIS and aged care reforms, and which are likely to continue without clarification of jurisdictional responsibilities.

State and Territory Governments still have a requirement to provide disability specific services

As remarked in the Productivity Commission's Issues Paper, there is a strong need for clarification of the continuing roles and responsibilities of state and territory governments to support people with disability and their carers outside the bounds of the NDIS. The respective roles of different levels of government has become particularly muddy as the NDIS has rolled out, especially given that a number of state and territory governments have used the opportunity of the nationalisation of services to divest themselves of disability service responsibility and delivery. This has a present and future impact on the availability of support for people with disability who do not meet the high bar for inclusion in the NDIS. It also impacts on those who are NDIS participants to the extent that the withdrawal of state and territory services has left them with nowhere to go for services where there are service gaps in the provider market.

Carer inclusivity

It is important that the NDA continues to recognise carers as stakeholders of the National Disability Agreement and the National Disability Strategy and their need for support at the state and territory as well as the national level.

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[1] Department of Prime Minister and Cabinet, Council of Australian Governments Report on Performance 2016, March 2016

Unpaid family and friend carers continue to provide the backbone for the disability support system. In 2015 the replacement value of unpaid care was estimated at $60.3 billion (or 3.8% of GDP). Without these carers, the NDIS, disability support services outside the NDIS, and aged care services would be unaffordable. Also, the successes and failures in providing support for people with disability to lead better and more independent lives impacts directly on those who care for them.

Carers Australia is particularly concerned that the states and territories may also begin to withdraw their support in relation to carers with the roll-out of the new national Integrated Carer Support Service. It needs to be noted that this initiative is not intended to replace existing state and territory delivered and/or subsidised carer support services. It is a reorganisation of existing national support to carers and it is funded by the national government. State and territories are not required to contribute to that funding. Among the roles of the ICSS is to refer carers to services available in their local areas which can meet their diverse needs. If these services are diminished because state and territory governments withdraw from supporting them, there may be very little to refer carers to in many cases. Against this background it needs to be understood that states and territories have a continuing obligation to provide carer support services within their jurisdictions and this must be reflected in the new National Disability Agreement and any accompanying strategy.

Disability support is not all about the NDIS

In addition, the National Disability Agreement and the National Disability Strategy are not all about disability policy and supports.

The outcomes of the National Disability Agreement include:

- People with disability achieve economic participation and social inclusion;
- People with disability enjoy choice, wellbeing and the opportunity to live as independently as is possible;
- Families and carers are well supported.

Achieving these outcomes goes beyond specialist disability supports to education policy, public transport, digital inclusion, a range of diverse local community services, workplace policies, health services, electoral and justice systems, housing standards and public housing.   The National Disability Agreement must specifically cover jurisdictional commitment, goals and identification of outputs across all these areas.

Even where some commitments fall predominantly into the bailiwick of particular jurisdictions, in most cases all levels of government can and should have a role in achieving these outcomes within their own sphere of responsibility and control.   For example, even if the national government has the major responsibility for the provision of employment services through the Disability Employment Service and supported employment, this is not to say that state and territory governments cannot make their own contributions to disability employment. Similarly, where services such as advocacy are not available through national programs, there is no reason why states should withdraw from the provision of these services. In this context, Carers Australia was particularly pleased when the NSW government recently reversed its decision to withdraw funding from disability advocacy services even though their bilateral agreement on the NDIS is based on them handing over all their disability services upon transition. We would hope they extend this commitment beyond two years.

Identifying and measuring outcomes

Any commitment binding different levels of government to pursue common outcomes is reduced in value and meaning if their accountability is diminished by a failure to measure performance against outcomes at each level.

As National Disability Services (NDS) highlights in it submission to the Issues Paper[2], the Disability Services National Minimum Data Set (DS NMDS), which is designed to provide comparable data about support services provided under the National Disability Agreement, has declined in usefulness with the introduction of the NDIS. It is noted that the NDIS has its own performance data which is not widely shared, and that data collection on services outside the NDIS is being scaled back. We support advocacy from the disability sector that wider linkage of NDIS data with other datasets, including those of the ABS and AIHW, is important to providing a better picture of how people with disability and their carers are faring. We are also of the view that the release of more NDIA data and greater opportunities across the sector for data sharing and data matching would help develop the provider market.

As already noted, both the National Disability Agreement and the National Disability Strategy include commitments across a range of mainstream areas which impact on the lives of people with a disability and those who care for them. Each jurisdiction should report on outcomes in these areas regularly. The results would be incorporated in an Australian Disability Report.

From the perspective of carers, the key source of national data on carers’ wellbeing and capacity to participate in community and economic life is the Survey of Disability, Ageing and Carers (SDAC). It is noted in the Issues Paper that three yearly ABS SDAC survey releases since 2009 may not continue without a funding commitment from the national government. Given the churn and uncertainty in the carer program space resulting from the NDIS, continuing aged care roll out and the Integrated Carer Support Service initiative, we are of the view that regular tracking of outcomes for carers is more important than ever. Indeed, we would expand the questions in the SDAC to be able to calculate the differences in carer outcomes between outcomes for those who are caring for someone with an NDIS package (and ideally an aged care Home Care Package) compared to those who are not.

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[2] National Disability Services (NDS) Submission to the Productivity Commission: National Disability Agreement Review, August 2018