

29<sup>th</sup> April 2011

**The Chief Executive Officer**

Inquiry into a National Disability Long-term Care & Support Scheme  
Productivity Commission  
GPO Box 1428  
Canberra City ACT 2601

Dear Sir/Madam,

## **SUBMISSION**

Knoxbrooke Incorporated thanks the Commission for its insight and comprehension of the issues that confront the disability care and support sector.

Most of the concerns that we raised in our earlier submission seem to be addressed however we make the following comments on your draft report:

### **Maintenance, improvement and replacement of existing infrastructure**

- Organisations like ours have invested heavily in essential infrastructure
  - buildings
  - transport (modified buses and vehicles)
  - lifting equipment, disability friendly toilets and kitchens
  - office and administration requirements

Our Day Program deals almost exclusively in the area of intellectual disability and families really appreciate our secure, reliable and safe pick up in the morning and a return in the afternoon bus service for their children.

Our continuation of this transport service is severely restricted by the cost to families and our ability to fund bus replacement.

Inadequate comment is made in your recommendations to fund infrastructure replacement

Draft recommendation 4.5 does speak of taxi subsidies, this needs broadening to support all forms of transport.

### **Local case managers**

- In the main, people's contact with the National Disability Insurance Agency would be through a local case manager.

While this arrangement may serve the best interest of the service users it does invest the case manager with considerable power and obligation.

In Victoria at present case managers do not appear to be adequately informed as to all of the services of the support agencies and they are aligned to the major agencies.

Selection, information supply, training and independence will be essential for this to have the required outcomes.

### **Quality assurance and reporting**

- The report includes the observation
  - the approach should focus on effective safeguarding and raising the actual quality of supports, rather than 'paperwork' initiatives, which would do little to ensure quality assurance but would impose compliance burdens on specialist disability service providers.

It is very refreshing to see such an approach being adopted.

- However
  - Draft recommendations 8.3 and 10.1 seem to contradict the above and we might still be required to keep copious records and fill in endless reports

Every endeavour must be made to either restrict this to essential information and/or to adequately fund the overheads needed.

### **Paying of family members, neighbors**

- Draft recommendation 6.4 allowing the payment to family members for services is in our opinion fraught with risk.

This does not necessarily take into account the required skills, OH&S, legal employment obligations like workcover, superannuation etc. or allow proper assessment of supervision and outcomes.

Draft recommendation 6.5 does put some restrictions on this and in our opinion this will need to be closely monitored.

Our involvement mainly in intellectual disability leads us to the apprehension that the report does not adequately acknowledge the distinction between "physical disability" and "intellectual disability". Requirements and support, in particular the infrastructure supports are much greater for intellectual disability.

These observations are presented in good faith and we are available at a time convenient to you to explain or expand on our thoughts.

Yours sincerely

**Patrick Dalton**

Chairman of Board of Management

**Rad Kilian**

Chief Executive Officer