

Submission to the Disability Care and Support Public inquiry

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TABLE OF CONTENTS

1	Executive Summary	1
2	About Response	1
3	Background.....	2
4	Discussion.....	4
	4.1 Support for a client-driven model	4
	4.2 'Early intervention', and why school is not for everyone	5
	4.3 Staffing challenges	7
5	Conclusion	9
6	List of recommendations	10
7	References	11

1 EXECUTIVE SUMMARY

Response Services Inc supports the proposed National Disability Insurance Scheme (NDIS).

We believe a move towards a client-driven model of funding and service provision rather than the current provider-centric option will result in better outcomes for people with disability, and recommend the NDIS relies on 'consumer choice' as a means to drive quality improvements in service provision.

With extensive experience in Government funded post-school programs, Response also sees a need for 'early intervention' for NDIS-eligible school students to determine if finishing year 12 is the right course of action for them. We recommend a program of pre-year 12 NDIS assessment.

Rollout of the NDIS is sure to result in better service options for people with disability, but also greater demand for workers in the sector and higher pressures on service providers to find suitably trained staff. Response recommends the NDIS helps foster the skills of people entering the disability services workforce by funding mature-age traineeships.

2 ABOUT RESPONSE

Response Services Incorporated is a disability service provider based in Newcastle and the Central Coast of NSW. It was established in 1994 and currently provides services to over 170 people with disability.

Response specialises in managing several post-school programs and receives funding from the NSW State Government.

3 BACKGROUND

In 2008 The Australian Government ratified the United Nations Convention on the Rights of Persons with Disabilities. In signing on, Australia agreed to recognise:

...the equal right of all persons with disabilities to live in the community, with choices equal to others, and shall take effective and appropriate measures to facilitate full enjoyment by persons with disabilities of this right and their full inclusion and participation in the community. (United Nations, 2008)

A year later, in the Disability Investment Group's (DIG) 2009 report *The Way Forward: A New Disability Policy Framework for Australia*, chairperson Ian Silk described the lack of planning and integration of disability services in Australia as "a national disgrace" (2009, p. v), setting in place events which would eventually lead to the formulation of the proposed National Disability Insurance Scheme (NDIS) and the Productivity Commission's Disability Support public inquiry.

While admitting that introduction of, and transition to, a Medicare-like scheme for supporting Australians with disability would be complex, the DIG report also claimed changes were essential because the Australian "system of formal support is failing many people with disability, their families and carers" (2009, p. 2).

The combination of statistical evidence and the peoples' personal accounts in many of the public inquiry submissions highlights the fact the level of disability support provided by Commonwealth, State and Territory Governments is inadequate (Australian Productivity Commission, 2011b).

However, across the Nation there are hundreds of service providers who—like Response—work tirelessly within the current restrictions of the system to improve the lives of people with disability. The proposed NDIS promises to provide greater opportunities for service providers to fulfil the needs of clients, while bringing financial and emotional certainty to all Australians who encounter disability in their lives.

Response commends the Australian Government for taking steps to improve the current system of disability support, and lends in-principle agreement to all the features of the proposed NDIS. There are, however, some aspects of the Productivity Commission's draft report which we believe require further discussion below.

4 DISCUSSION

4.1 SUPPORT FOR A CLIENT-DRIVEN MODEL

As the Productivity Commission's draft report points out, the current provider-centric model of funding offers people with disability or their families little opportunity to have a say in the services they use or to have control over the finances allocated to them (2011a, section 1.4).

Currently, the block-style funding arrangements which predominate in most States and Territories contribute to an inevitable focus by some service providers on meeting the expectations of the funding provider *before* meeting the needs of the client; a situation which in our opinion is untenable.

We believe opportunities for persons in receipt of funding packages under the NDIS to choose how their funding is spent, by selecting services best suited to them, will result in great improvements to the quality of services they eventually receive. Service providers will react to demand for particular types of programs—the best reacting swiftly, the poorer perhaps more slowly and to their detriment—thus resulting in better fulfilment of the specific needs of each client.

Response recommendation (1):

That the NDIS continues to develop a client-driven 'consumer choice' model as a means to positively influence the overall quality level of services and providers.

4.2 'EARLY INTERVENTION', AND WHY SCHOOL IS NOT FOR EVERYONE

The draft report points out the difficulty in providing a precise definition of just what 'early intervention' is. In developing a working definition, the Productivity Commission is mainly considering those interventions which seek to reduce the impact of new or existing disabilities, rather than preventing risk of new disability (Australian Productivity Commission, 2011a, section 11.2).

With this in mind, it is important to note that one factor involved in reducing the impact of existing disability is the timely transition of young people with disability into appropriate post-school programs.

The New South Wales Department of Ageing, Disability and Home Care (ADHC) funds two post school programs, namely *Community Participation* and *Transition to Work*. Eligibility policy for both programs stipulate an applicant must generally be a school leaver with moderate to high support needs who has completed year 12 (ADHC, 2006, p. 12, 2008, p. 12).

The standard path for entering the programs involves mid-year registration, screening and assessment in the final year of study. Earlier admission to the programs requires the young person or their family apply to the ADHC Regional Director for consideration.

We believe this arbitrary policy discourse does not suit a large proportion of young people with disability, for whom finishing year 12 may not be in their best interest. Just as many young people become valuable members of the community by taking up vocational training, traineeships or trade apprenticeships without finishing year 12, people with disability may also benefit from early integration into society by learning skills associated with the above mentioned programs.

This theory is supported by many of the submissions which contributed to the report *Shut Out: The Experience of People with Disabilities and their Families in Australia* (National People with Disabilities and Carer Council, 2009). Almost one-third of submissions felt the education system acts as a barrier to greater

achievement and independence (2009, p. 47), citing lack of resources, inflexibility of funding, systemic lack of commitment to inclusion, and **the need for timely, individualised planning for transition to post-school options** as areas of great concern (pp. 48-51).

Response recommendation (2):

That the NDIS funds an 'early intervention' program specific to eligible high school-aged children to accurately determine the needs of each person with disability before they reach year 12.

4.3 STAFFING CHALLENGES

The draft report states the disability service sector would face significant structural changes under a NDIS, in particular increased funding, changes in the design of disability systems, the adoption of consumer choice and new governance arrangements (Australian Productivity Commission, 2011a, p. 8.2).

One recommendation of the draft report is that the NDIS should develop its own process for approving specialist providers, which would—among other things—ensure that service providers have appropriately experienced management and qualified staff (p. 8.28).

With the anticipated need for a large increase in the supply of disability workers after the introduction of the NDIS, there will be an extra burden on service providers to find suitably experienced and qualified staff to meet the approval process. Response anticipates this will be a difficult task for two reasons;

- While certificate-level training, such as TAFE courses in disability work, provide staff with vital knowledge, it cannot adequately prepare potential employees for the demands of everyday, at-the-coalface work in disability services, resulting in a ‘second tier’ of on-the-job training taking place, resulting in the potential for service deficiencies to clients.
- Wages do not reflect the unique and challenging nature of working in disability services, providing a disincentive for people to enter the sector. This is evidenced by data which shows that disability workers’ wages appear low (Australian Productivity Commission, 2011a, pp. 13.16-13.17).

In the section subtitled *Promoting certification through training and education subsidies* the draft report considers the possibility of “supporting the acquisition of the skills required to excel in the industry” (p. 13.24), but concludes this strategy would probably not be cost effective as an industry-wide measure, while it also points out the disability workforce in Australia is dominated by a female, older demographic (p. 13.15), with 63 per cent of disability workers

entering the sector at age 30 years or older (Martin & Healy, 2010, cited in Australian Productivity Commission, 2011a, p. 13.13).

We believe there is an opportunity for the NDIS to develop a mature-age traineeship program for workers entering the disability services sector. This would not only harness the power of the current worker demographic, but also help workers gain valuable theoretical and on-the-job training while helping meet the anticipated demand for more trained staff post-NDIS rollout.

Response recommendation (3):

That the NDIS wholly or partly funds a mature-age traineeship scheme for prospective workers to develop both theoretical and practical skills for a career in the disability services sector.

5 CONCLUSION

We now see there are many challenges which lay ahead for disability support policy in Australia. The NDIS promises to bring greater financial and emotional certainty to people with disability. It also presents new opportunities and challenges for service providers.

The proposed client-driven model will take the focus off service providers and place it—correctly—on the individual service user. This will have a positive impact on the quality of services people with disability can access.

There are, however, several ways to make the NDIS even better. One of these involves the introduction of ‘early intervention’ assessment of high school people with disability to determine at the earliest possible stage if going on to year 12 is their best option. Another is for the NDIS to fund a mature-age traineeship program for the disability sector, as a way to meet the impending need for more skilled workers.

6 LIST OF RECOMMENDATIONS

- (1) That the NDIS continues to develop a client-driven 'consumer choice' model as a means to positively influence the overall quality of services from providers.
- (2) That the NDIS funds an 'early intervention' program specific to eligible high school-aged children to accurately determine the needs of each person with disability before they reach year 12.
- (3) That the NDIS wholly or partly funds a mature-age traineeship scheme for prospective workers to develop both theoretical and practical skills for a career in the disability services sector.

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