



1 September 2023

Submission to the NDIS Review

This is Inclusion Australia's final written submission to the NDIS Review. It supplements the following submissions we have provided to the Review:

- [NDIS Quality and Safeguarding Framework review](#), May 2023
- [Response to the Participant Safeguarding Proposals Paper](#), July 2023
- [The role of pricing and payment approaches in the NDIS](#), August 2023
- [Our Voice submission to the NDIS Review](#), September 2023
- [Joint submission from the National Advocacy Collective](#) supporting the rights of parents with an intellectual disability, September 2023.

This submission provides a summary of the key themes that emerged through a series of policy workshops held in August 2023 as part of Inclusion Australia's commissioned engagement work for the Review.

The submission also provides some additional points regarding the provision of mainstream supports and Tier 2.

Policy workshops

Inclusion Australia hosted five two-hour policy workshops in August with advocates, researchers, family members, and other experts across the following topics:

1. Access and planning
2. Complex support needs and restrictive practices
3. Home and living
4. Reasonable and necessary
5. Supported decision making.

Background papers were commissioned from specialists in each topic and provided to attendees before the workshops. These papers, along with transcripts from the workshops, have been provided to the NDIS Review as part of Inclusion Australia's commissioned engagement work.

We would like to draw attention to several key points – 'golden threads' – that emerged and kept appearing throughout the workshops, across the different topics.

- Issues with the way that ‘**reasonable and necessary**’ supports are determined for people with an intellectual disability, especially in terms of:
 - Individualised plans only providing **funding for shared supports**. This often happens in direct support provision in terms of daily living supports and community participation, and it drives provider offerings and options and contributes to the perpetuation of segregated services and opportunities for people with an intellectual disability.
 - **Access to housing**. There was consensus in our home and living workshop that NDIS plans should be able to contribute to an individual’s rent costs, rather than only used for specialised forms of accommodation. Poverty is pervasive for people with an intellectual disability and affordable housing options are limited. If a participant doesn’t require specialised disability accommodation but does require support to live in a house that’s accessible, and in a location that enables access to their community, this should be supported by the NDIS.
- **Workforce capability** was raised repeatedly in our workshops. The importance of having an NDIS workforce that understands human rights – and is trained in the theory and practice of **supported decision-making** – was seen as crucial.
 - Workshop attendees strongly emphasised the need for the workforce to employ **active support** methods, rather than passive support. This requires training (upskilling) as well as accountability/monitoring, time, and appropriate funding. It will require adjusting incentives and KPIs for staff and providers.
 - In the long term, an active support approach that utilises supported decision-making, will build the capacity of people with an intellectual disability to have agency and make their own decisions about their lives, as well as increase their independence and choice and control, and reduce their reliance on (or changing the profile of) formal supports.
 - As well as the benefits this brings for individuals, at a structural and Scheme level this will have long-term financial benefits.
- The importance of **peer support and self-advocacy** was raised across the workshops. For people with an intellectual disability, this is fundamental to support positive life outcomes and community inclusion, as well as enabling people to be active and empowered consumers in the NDIS market.
 - Stable and sustained funding for the development and maintenance of self-advocacy and peer support groups and ecosystems across Australia is essential. This has been a marked gap in the NDIS environment to date.

Tier 2 and mainstream supports

Inclusion Australia and [our member organisations](#) have provided input to the Review on our thoughts on the future of Tier 2 and improvements that can be made to mainstream service systems through several meetings with Daniel Franklin.

We would like to affirm the importance of several key points:

- There is a range of supports that organisations like our members provide to people with disability, including those who are NDIS participants, that are currently only funded through ILC grants. This includes activities such as capacity building around supported decision-making.
- We firmly believe that there should be options for other forms of funding – that are stable and long-term – for activities like this that will always be needed by people with disability and are not funded by other means. This includes information provision. Short-term grant funding which favours innovative or novel programs is not a practical solution to meet these community needs over time.
- Additionally, there is a clear ongoing role for organisations like our members, which are trusted and respected by people with an intellectual disability and their families. These organisations are often the first port of call for people with an intellectual disability and families on a wide range of questions and issues, including system navigation support. They also provide considerable support to families in their role as ‘informal supports’, such as building their decision support capacity.
- These organisations do not currently receive funding to provide this critical community role, but they fill the gaps created by other services exiting the space – and they also play a unique role as trusted advisors and peer organisations.
- Any recommendations about the future of the ILC program, Tier 2, the provision of services for people with disability who are not NDIS participants, or other intersections with mainstream supports, should seriously consider the unique role that community organisations like these play in people’s lives and in local communities.
- Funding for these organisations should enable their ongoing delivery of critical information, interface, and support services for people with an intellectual disability and their families, beyond short- or medium-term grant funding. Funding these community organisations and their interface roles should be given preference over funding to service providers or large mainstream organisations, which we have seen receive considerable funding through past ILC grant rounds.