



Submission to the NDIS Review

August 2023



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Our Commitment to Inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children.

Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

Learn more about our commitment to inclusion: <salvationarmy.org.au/about-us>

The Salvation Army is an international movement and our mission is to preach the gospel of Jesus Christ and to meet human needs in his name without discrimination.

More information about The Salvation Army is at **Appendix A**.





Executive Summary

The Salvation Army welcomes the opportunity to provide this submission to the Independent Review Panel's National Disability Insurance Scheme (NDIS) Review (the Review).

For over 140 years The Salvation Army have walked alongside people experiencing hardship and disadvantage. These experiences include, but are not limited to, poverty and financial hardship, family and domestic violence, homelessness, living with a disability, and people from refugee and migrant backgrounds.

It is from their experiences, as well as those of our frontline staff, that we have approached this submission. We outline just a few of the challenges and barriers faced by people living with a disability and their families, and provide suggestions that we believe will better ensure equitable outcomes for all people living with a disability, whether accessing the NDIS or not.

Most of our recommendations come down to the need to keep people who are living with a disability at the centre of all processes that relate to them, and ensure that they, alongside their families, are supported to meaningfully engage with services and supports in their local communities.

This submission has been structured to respond to the Review's 10 priority areas for improvement, as outlined in the What We Have Heard report.¹

The Salvation Army has made 13 recommendations for the Independent Review Panel to consider. A summary of these recommendations follows on the next page.

¹ Australian Government. (June 2023). *What we have heard: Moving from defining problems to designing solutions to build a better NDIS*. <https://www.ndisreview.gov.au/sites/default/files/resource/download/what-we-have-heard-report.pdf>.



Summary of Recommendations

Recommendation 1

1.7 The Salvation Army recommends that the Independent Review Panel consider recommending reviewing the NDIS application process to better empower people experiencing vulnerability or disadvantage to access the NDIS.

Recommendation 2

1.8 The Salvation Army recommends that the Independent Review Panel consider recommending embedding support coordination in NDIS plans for participants or families with complex needs or facing vulnerability and disadvantage.

Recommendation 3

2.4 The Salvation Army recommends that the Independent Review Panel recommend reviewing the interface between the 'mainstream' service and NDIS systems to encourage holistic approaches across the sector.

Recommendation 4

3.5 The Salvation Army recommends that the Independent Review Panel recommend reviewing current NDIS planning processes to ensure assessment of 'reasonable and necessary' supports is best-practice and human-rights driven.

Recommendation 5

4.8 The Salvation Army recommends that the Independent Review Panel consider recommending increased investment in affordable health and developmental supports outside of the NDIS. This would ensure support is available to all children and families regardless of NDIS eligibility.

Recommendation 6

4.11 The Salvation Army recommends that the Independent Review Panel consider recommending, where possible and appropriate, services and supports being provided alongside families as opposed to exclusive therapy one-on-one with a child.

Recommendation 7

5.3 The Salvation Army recommends that the Independent Review Panel consider reviewing professional standards for services and supports both within and outside of the NDIS. This could include improving availability of educational opportunities for staff who are delivering services alongside families experiencing disadvantage or complex needs.

Recommendation 8

5.9 The Salvation Army recommends that the Independent Review Panel recommend reviewing NDIS processes to improve support continuity and therefore quality within the NDIS. This could include increasing funding and availability of support coordination within individual NDIS plans, or investing in increasing understanding of planning and coordination roles within the NDIS.



Recommendation 9

6.2 The Salvation Army recommends that the Independent Review Panel strengthen performance and outcome measures including:

- *Plan and goal setting,*
- *Service coordination, integration, and partnerships,*
- *Participant-centred community participation, and*
- *Engaging children and young people.*

Recommendation 10

7.6 The Salvation Army recommends that the Independent Review Panel consider the benefit of working alongside federal, state and territory, and local governments to increase the availability of support services outside of the NDIS to ensure improved long-term outcomes for all.

Recommendation 11

8.2 The Salvation Army recommends that the Independent Review Panel consider the benefit of improving NDIS navigation by prioritising:

- *Face-to-face contact,*
- *Understanding of local contexts, and*
- *Coordination and support available to all people.*

Recommendation 12

9.4 The Salvation Army recommends that the Independent Review Panel urgently request the NDIA work alongside state and territory governments to ensure the protection, safety and wellbeing of highly vulnerable and disadvantaged residents living in specialised congregate living facilities, where funding for these facilities is not met by the NDIS, Disability Housing, Aged Care or Specialist Homelessness Services funding.

Recommendation 13

10.2 The Salvation Army recommends that the Independent Review Panel consider the benefit of including the following factors in improving safety and outcomes for NDIS participants:

- *Approaches which are aspirational, individual and empowering,*
- *Accountability and transparency, and*
- *Building collective knowledge of the sector.*



1 Applying and Getting a Plan

- 1.1 The Salvation Army maintains concerns consistent with the What We Have Heard report, that applying for the NDIS is becoming increasingly difficult.² In our experience, this is largely due to difficulties in gathering evidence, and in the nature of the application process.
- 1.2 Our services have identified significant gaps in community support systems that are available or accessible to support all families and applicants in navigating and working through the application and pre-eligibility process. The NDIS application process requires significant administration such as evidence gathering, understanding NDIS language and concepts, scheduling of appointments, and liaising with multiple services and parties. Since shifting from state-run disability services, this administrative burden has disproportionately fallen to individuals, families, and non-government organisations (NGO's) to navigate.
- 1.3 This complex administrative barrier is only exacerbated for families from culturally and linguistically diverse (CALD) backgrounds. These families are often navigating complex housing, employment and support systems, where English may not be their first language, and there is minimal culturally appropriate support. Families on certain temporary visas are further restricted from accessing many social support payments and subsidies.

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“For families with complex needs, a coordinator can be the difference between utilising a NDIS plan effectively or not.”

- A Salvation Army Communities for Children Worker

”
- 1.4 This often leaves little capacity and capability to effectively engage in NDIS applications and processes. For those from CALD backgrounds, culturally appropriate support should be embedded throughout both NDIS applications and plan delivery. Our services have identified that translators are often required at all points of the process, and that there is a need for support coordination to be embedded within their NDIS plan.
- 1.5 The Salvation Army's homelessness services have also identified that for people with a lived experience of homelessness, gathering the evidence required to apply for the NDIS is particularly difficult. Application paperwork and the fulfilment of other evidentiary tasks often falls on homelessness service staff to assist in the absence of family or other supports.

² Australian Government. (June 2023). *What we have heard: Moving from defining problems to designing solutions to build a better NDIS*. <https://www.ndisreview.gov.au/sites/default/files/resource/download/what-we-have-heard-report.pdf>.





“For homeless clients...they may have been homeless for 20 years, they don't necessarily have the medical evidence [needed] and so find it difficult to apply.”
- A Salvation Army Homelessness Service Worker

- 1.6 For people experiencing homelessness, the cost of the application process; including assessments, medical appointments and travel expenses, all act as barriers to applying for the NDIS, regardless of suitability for the scheme.

“...neuropsych[ological] assessments can cost \$1800. Without an assessment, they can't apply for a package.”
- A Salvation Army Homelessness Service Worker

Recommendation 1

- 1.7 The Salvation Army recommends that the Independent Review Panel consider recommending reviewing the NDIS application process to better empower people experiencing vulnerability or disadvantage to access the NDIS.

Recommendation 2

- 1.8 The Salvation Army recommends that the Independent Review Panel consider recommending embedding support coordination in NDIS plans for participants or families with complex needs or facing vulnerability and disadvantage.



2 A Complete and Joined Up Ecosystem of Support

- 2.1 As discussed in the What We Have Heard Report, The Salvation Army's services have identified that support for people deemed ineligible or not accessing the NDIS are limited, with significant government investment going into disability supports provided through the NDIS.³ We suggest that this drives an approach where those with the 'most need' are able to access services, while those who do not meet eligibility criteria may miss out on supports all together.
- 2.2 The Salvation Army urge the need for a focus on innovation and incentives that drive best practice and partnerships. We believe that a complete and joined up ecosystem of support is not just about the NDIS, but is about support for all people, whenever it is needed. This responsibility should be shared among all levels of government, as well as the community, NGO's and business sectors. The supports need to consider the whole-of-family needs and context, working alongside the family and other services engaged with them.
- 2.3 Our Child Health Pathways program have highlighted that there are limited affordable, accessible, and culturally responsive resources in the early years, despite these services being necessary for children to "get on track." We have observed that allied health services in particular have moved out of the primary healthcare provision into a tertiary, almost specialised setting within the NDIS. This has led to services such as speech therapy or child development supports becoming harder to access for those outside of the NDIS as families are required to go through particular channels to receive it.

Recommendation 3

- 2.4 **The Salvation Army recommends that the Independent Review Panel recommend reviewing the interface between the 'mainstream' service and NDIS systems to encourage holistic approaches across the sector.**

³ Australian Government. (June 2023). *What we have heard: Moving from defining problems to designing solutions to build a better NDIS*. <https://www.ndisreview.gov.au/sites/default/files/resource/download/what-we-have-heard-report.pdf>.

3 Defining Reasonable and Necessary

- 3.1 The Salvation Army note that the terms 'reasonable and necessary' are subjective and contextual, and as such are reliant on the individual NDIS planner's understanding of a participant's life context – including their community, family, development, diagnoses, prognosis, and the supports and services that are accessible to them.
- 3.2 We believe it critical that NDIS planners adopt a human-rights approach to the terms 'reasonable and necessary,' prioritising principles such as participation, accountability, non-discrimination, equality, and empowerment.⁴
- 3.3 The Salvation Army's services have identified that NDIS planner's understanding of participant context, and ability to adopt a human-rights approach is complicated by current planning processes. For example, the current allocation of 1.5 hours (approx.) per year for NDIS plan reviews. In our experience having such a short time to assess a person's context and needs does not ensure quality or consistency in the critical planning process.
- 3.4 Our services report also that assessments and plan reviews are often completed over the phone. This is particularly problematic when NDIS participants are young children. We believe that assessments and plan reviews should be completed face-to-face wherever possible, and shared decision-making and collaboration with multiple parties should be prioritised.

Recommendation 4

- 3.5 The Salvation Army recommends that the Independent Review Panel recommend reviewing current NDIS planning processes to ensure assessment of 'reasonable and necessary' supports is best-practice and human-rights driven.**

⁴ Australian Human Rights Commission. (Undated). *Human rights based approaches*. <https://humanrights.gov.au/our-work/rights-and-freedoms/human-rights-based-approaches>.



4 Early Childhood Supports

- 4.1 It is widely acknowledged that a child's earliest experiences provide the foundation for their future.⁵ Research tells us that 90 per cent of brain growth occurs by age five, making the early years crucial in determining future health, wellbeing, learning and development outcomes.⁶
- 4.2 Timely access to quality early intervention services and community supports that meet a child's needs are critical to ensure the best possible life outcomes.⁷ Early interventions and supports support a reduction in lifetime inequalities.⁸ This is particularly important for children with chronic medical conditions, physical or intellectual disabilities, emerging mental illness, or an experience of trauma.
- 4.3 Consistent with the What We Have Heard report, the Salvation Army has seen firsthand that there is not enough support built around families and children in local communities, within or outside of the NDIS.⁹

Support for All Children

- 4.4 Availability and accessibility of targeted developmental supports in the early years outside of the NDIS is limited. Our Communities for Children service in Logan reports that free or affordable information regarding developmental needs and supports is not widely available, and that there are often significant waitlists and high costs associated with accessing allied health or specialist services.
- 4.5 Further, for children not on the NDIS, the onus is placed on parents and caregivers to navigate complex systems such as healthcare, early intervention supports, and disability supports to better understand and meet their child's developmental needs. This is exacerbated by siloed service systems, and long waitlists for health services such as paediatricians. This risks a child's developmental vulnerabilities being left undiagnosed, unaddressed or inadequately supported for significant periods of time, and potentially impacts long-term health and wellbeing outcomes.
- 4.6 Our services observe that the perceived exclusivity of high-quality allied health and developmental support services within the NDIS, leaves families more likely to pursue a diagnosis for their child. We find that this is often encouraged by Early Childhood Education


⁵ Fox, S., Southwell, A., Stafford, N., Goodhue, R., Jackson, D. and Smith, C. (2015). *Better Systems, Better Chances: A Review of Research and Practice for Prevention and Early Intervention*. Canberra: Australian Research Alliance for Children and Youth (ARACY). https://www.aracy.org.au/publications-resources/command/download_file/id/274/filename/Better-systems-better-chances.pdf.

⁶ The Parenthood. (2021). *Making Australia the Best Place in the World to be a Parent*. https://d3n8a8pro7vnm.cloudfront.net/theparenthood/pages/669/attachments/original/1613473151/Final_Report_-_Making_Australia_The_Best_Place_In_The_World_To_Be_A_Parent.pdf?1613473151.

⁷ Fox, S., Southwell, A., Stafford, N., Goodhue, R., Jackson, D. and Smith, C. (2015). *Better Systems, Better Chances: A Review of Research and Practice for Prevention and Early Intervention*. Canberra: Australian Research Alliance for Children and Youth (ARACY). https://www.aracy.org.au/publications-resources/command/download_file/id/274/filename/Better-systems-better-chances.pdf.

⁸ Ibid.

⁹ Australian Government. (June 2023). *What we have heard: Moving from defining problems to designing solutions to build a better NDIS*. <https://www.ndisreview.gov.au/sites/default/files/resource/download/what-we-have-heard-report.pdf>.



and Care (ECEC) and school settings to ensure children can access supports and services which are not widely available or accessible in local communities.

- 4.7 We urge the need for targeted services such as allied health and developmental supports to be widely available to children and their families both within and outside of the NDIS, ensuring that all children have access to early intervention, and best possible life outcomes.

Recommendation 5

- 4.8 The Salvation Army recommends that the Independent Review Panel consider recommending increased investment in affordable health and developmental supports outside of the NDIS. This would ensure support is available to all children and families regardless of NDIS eligibility.**

Engaging Families

- 4.9 Families need to be engaged in their child's supports, to encourage both early and long-term intervention. The Salvation Army's services have identified a shift whereby Early Childhood Education and Care (ECEC) settings are becoming spaces where support services are being pushed to engage with children. Whilst from a state education perspective this practice supports the upskilling of ECEC staff, it also disengages families from the support process.
- 4.10 It is critical that families are engaged in their child's early years supports both in the home, and within their local communities to ensure therapies and learnings translate to the home environment. Families need access to quality information, readily accessible allied health support, and community services. Collaboration and holistic care are only further complicated when all services through the NDIS have associated costs.

Recommendation 6

- 4.11 The Salvation Army recommends that the Independent Review Panel consider recommending, where possible and appropriate, services and supports being provided alongside families as opposed to exclusive therapy one-on-one with a child.**



5 The Support and Service Marketplace

Professional Standards and Educational Opportunities


- 5.1 The Salvation Army highlights the need for enhanced professional standards for services and supports both in and outside of the NDIS. We further suggest the need for increased training and educational opportunities for allied health and service staff related to working alongside families experiencing disadvantage or who have complex needs.
- 5.2 For example, one of the challenges seen by our Communities for Children and Child Health Pathways services in Queensland is that allied health education and professional skills do not always translate into different contexts. We have noticed that allied health students and professionals sometimes find working with children and their families difficult in particular contexts such as intergenerational poverty and complex needs.

Recommendation 7

- 5.3 The Salvation Army recommends that the Independent Review Panel consider reviewing professional standards for services and supports both within and outside of the NDIS. This could include improving availability of educational opportunities for staff who are delivering services alongside families experiencing disadvantage or complex needs.**

Structures that Encourage Support Continuity and Quality

- 5.4 The Salvation Army's services report concern regarding continuity of service provision, particularly in the context of young children. Our Child Health Pathways service reports that the current market is producing a sense of desperation among families to access any services available to them in fear of the service being unavailable in the future. For example, a child may be seeing multiple therapists, though each is being funded from different sources - such as the NDIS plan, a school, or community services. The disconnect between services significantly reduces the quality of care, with therapists and services taking different approaches, with little to no communication with each other.
- 5.5 Another concern our early years services have identified is that within NDIS plans, a child may be approved for a certain number of sessions with a therapist. Families are often concerned about using any less than the approved number of sessions, whether needed or not, for fear of losing funding. This limits the services available for other children who may also require the support.
- 5.6 The Salvation Army acknowledges the important role of NDIS plan managers, service coordinators and providers, although our services maintain concern that understanding of these roles remains limited within the community. We suggest the need to maximise understanding of and engagement with these roles.

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- 5.7 For example, we believe that plan coordinators are integral for participants and families navigating the NDIS, which is a complex system which also interacts with other complex state and federal systems. This can include employment, homelessness, and healthcare to name a few. Our services report a significant number of families take on the coordination of participants' NDIS plans, and experience distress in doing so.
- 5.8 We urge the need for improved community understanding of roles related to NDIS planning and coordination, alongside increased funded hours of support coordination as part of individual NDIS plans. We believe this will ensure individuals are not only utilising but are maximising their support plans.

Recommendation 8

- 5.9 The Salvation Army recommends that the Independent Review Panel recommend reviewing NDIS processes to improve support continuity and therefore quality within the NDIS. This could include increasing funding and availability of support coordination within individual NDIS plans, or investing in increasing understanding of planning and coordination roles within the NDIS.**

6 Measuring Outcomes and Performance

- 6.1 The Salvation Army believe that the following outcome and performance measures are critical to ensuring a human-rights based approach in supporting people living with a disability:
- **Planning and goal setting** – Our services have reported that NDIS reviews and planning often focus on the past goals and wishes of participants. We urge that NDIS planning should not be repeatedly reviewing past goals but should be centered around longer-term goals across the life domain. By adopting an aspirational mindset, we believe outcomes would not simply be treated as short-term solutions for individuals living with a disability.
 - **Coordination, integration and partnership** - In the context of early support and intervention, our early years services highlight that there needs to be coordinated intensive support prior to children accessing the NDIS. An integrated and holistic approach between mainstream and NDIS services, through capacity building and improved information linkages for non-NDIS participants, would ensure that children who need the NDIS are able to access the scheme in full, while others can receive sufficient support outside of the scheme.
 - **Participant-centred community participation** – Crucial to community participation is the voice of participants in service design, monitoring and implementation. Community services should no longer provide services *to* but rather *with* people living with disabilities. Our services have also highlighted that participants' engagement within the local community is often hindered by the misalignment of services such as timely access to transport. We urge the need for greater outcome measures related to community participation to avoid misalignment of supports and to ensure the full participation, empowerment, and inclusion of those living with a disability.
 - **Engaging children and young people** – Our early years services observe that children are often left out of their NDIS planning processes, with assessors spending the majority of the time speaking with the adults around the child. Particularly when completed over the phone, this results in plans being developed by assessors who have made an assessment without ever meeting the child. Planning processes need to be child-centred, should include the voice of the child and should be developed according to the child's perspective. This would involve implementing performance outcomes to ensure NDIS assessors have the appropriate tools and training to complete assessments with children in a child-centred way.

Recommendation 9

6.2 The Salvation Army recommends that the Independent Review Panel strengthen performance and outcome measures including:

- Plan and goal setting,
- Service coordination, integration, and partnerships,
- Participant-centred community participation, and
- Engaging children and young people.

7 Achieving Long Term Outcomes

- 7.1 In addition to the importance of aspirational and long-term outcomes that are central to the purpose of the NDIS, it is critical that sufficient policy and funding attention is also directed outside of the NDIS to ensure improved long-term outcomes for all Australians.
- 7.2 Our early years services have identified significant stressors for children and their families who are accessing NDIS support in relation to ensuring they use their plan fully. Families fear losing funding, and ultimately, losing critical supports.
- 7.3 If sufficient support options such as allied health were more readily available and accessible in the community, we believe this stressor would reduce significantly. Individuals would be able to transition into supports outside of the NDIS, which could reduce intensive service use and reliance on the NDIS more generally.
- 7.4 This is particularly the case for young children, where their needs change over the trajectory of the early years. This bridging between NDIS and mainstream supports would ensure a more holistic approach provide improved long-term outcomes for all individuals living with a disability.
- 7.5 Developing such a support system could be effectively achieved by partnering with the community services sector who have an awareness of already existing services provided by NGO's and not-for-profit organisations in local communities. This would ensure additional services were complementary and integrated within local community settings.

Recommendation 10

- 7.6 The Salvation Army recommends that the Independent Review Panel consider the benefit of working alongside federal, state and territory, and local governments to increase the availability of support services outside of the NDIS to ensure improved long-term outcomes for all.**

8 Help Accessing Supports

- 8.1 The Salvation Army believes that the following factors are critical to ensuring high-quality NDIS support and service navigation:
- **Face-to-face contact.** We urge the importance of face-to-face interactions with the NDIS participant and their supports wherever possible within the NDIS. This is particularly important when working with young children.
 - **An understanding of the local context.** In our experience, the services and supports available to participants vary considerably across different communities and local areas. This is particularly important for rural and remote areas. We have witnessed examples of children receiving NDIS funding for supports that have extensive waitlists or are simply not available in their local area. Apart from not receiving required supports, this results in unused funding and the potential loss of support budget when the plan is reviewed.
 - **Coordination and support available for all.** Our services highlight the need for holistic supports working alongside people living with a disability from pre-eligibility through to engaging with different supports through the NDIS. An example of this of this is our Child Health Pathways pilot program in Logan Queensland.

The Salvation Army – Child Health Pathways Pilot Program

The Child Health Pathways (CHP) Project is a partnership between Brisbane South Primary Health Network, Thriving and on Track program, Department of Education, and Children's Health Queensland. The project aims to ensure children and families are engaged with Child Health Services and other social supports across Logan. Our CHP team work within local community hubs to support families to navigate and connect with services to support their child's development. This can include, but is not limited to, alternate or supported education services, the NDIS, early intervention programs, allied health services, family home support and multicultural support services. The program is currently open to families within specific parts of the Logan Local Government Area in Queensland who have a child aged 0 to 6 years old who have been identified as having suspected developmental difference. This can be identified by the parent, a health professional, or a childcare worker. The program is voluntary and not time limited.

The nature of the Child Health Pathways program allows workers to view the needs of families holistically and take a personal and contextualised approach to service delivery. The service is an independent third party, providing support to families through advocacy, empowerment, and support coordination and facilitation as needed.

The approach, particularly to support coordination and facilitation, is not based on eligibility criteria, and recognises that families fluctuate in their need for this service. For example, we see that particularly at key transition points – such as a crisis at home, a new diagnosis, changing therapists or entering or leaving school – having support coordination keeps supports moving smoothly, and improves outcomes for both children and their families.



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“People’s wellness is more than just the nominated therapeutic support in their NDIS plan.”

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- A Salvation Army Communities for Children Worker

Recommendation 11

8.2 The Salvation Army recommends that the Independent Review Panel consider the benefit of improving NDIS navigation by prioritising:

- Face-to-face contact,
- Understanding of local contexts, and
- Coordination and support available to all people.

9 Supported Living and Housing

- 9.1 The Salvation Army's housing services often encounter participants receiving NDIS services and support. We are pleased to observe that the introduction of the NDIS has seen significant growth in the supports available to many of the individuals that access our services. This has ultimately been highly beneficial to their life outcomes and opportunities.
- 9.2 Since the introduction of the NDIS however, the financial viability of our congregate housing services has been significantly impacted. In our experience, due to the intersectional needs of people living in our congregate accommodation, our services have become ineligible for funding from other sources such as Aged Care, Specialist Homelessness Funding, and Disability Housing. This leaves our services struggling to cover costs outside of NDIS funding to individual residents such as those for maintenance, meals, laundry, and utility bills. Inadequate funding to these services places people living with complex needs at further risk of homelessness, whether they have access to the NDIS or not.
- 9.3 This can be seen in our Foley House example below.

The Salvation Army – Foley House

The Salvation Army's Foley House provides long-term support, accommodation and meals for 45 men who have complex support needs. Foley House is not NDIS supported living accommodation, but a congregate living space for individuals with intersectional needs. This includes chronic homelessness, ageing, mental health concerns, living with a disability, and high levels of ongoing support needs.

Prior to the introduction of the NDIS, Foley House was funded under Homelessness and Community Care funding packages. On introduction of the NDIS, this funding reduced significantly. Foley House receives minimal funding from the Victorian Government, which has also only decreased since the introduction of the NDIS. This has had a significant impact on the financial viability of Foley House.

37 of the 45 residents at Foley House are supported by the NDIS. Individual support plans have improved wellbeing for these clients significantly as they are able to access allied health support, and social activities. Despite these benefits to individuals, the Foley House service have found that no funding support is provided for the additional 'housing' costs and tasks the service needs to administer. This includes laundry, daily meal provision, payment of facility electricity and gas bills, building maintenance and the administration involved in managing, coordinating and liaising with various service providers attending Foley House for individual NDIS clients.

Foley House is currently being subsidised by The Salvation Army at the cost of some \$1 million per annum and this is not sustainable.



Recommendation 12

- 9.4 The Salvation Army recommends that the Independent Review Panel urgently request the NDIA work alongside state and territory governments to ensure the protection, safety and wellbeing of highly vulnerable and disadvantaged residents living in specialised congregate living facilities, where funding for these facilities is not met by the NDIS, Disability Housing, Aged Care or Specialist Homelessness Services funding.**

10 Participant Safeguards

10.1 To build on current safeguarding measures for participants within the NDIS and ensure safety and good outcomes, The Salvation Army believes the following need to be prioritised:

- **Approaches are aspirational, individual, and empowering.** We urge the need for the focus to be on individuals, their aspirations, goals, outcomes, and wellbeing wherever participants or their support network encounter the NDIS. People living with a disability should not be seen as a homogenous group, but individuals with different goals and needs.
- **Accountability and transparency.** We urge the need for increased accountability for the NDIS service market and providers, particularly around transparency of information. In our experience in the early years sector, participants and families are provided with little to no information from the NDIS service concerning good practice, nor avenues to report poor practice. This information and power sits with NDIS service providers, leaving individuals and their support network much less empowered to advocate for themselves around quality service delivery. For example, our Child Health Pathways service as an independent third party often educates families on poor practice within the NDIS and empowers them to advocate and address this through appropriate channels. Information regarding quality service provision, and avenues to report poor practice should be embedded within the NDIS system. We believe all participants should be able to access this information in order to empower them to best advocate for themselves.
- **Building collective knowledge of the sector.** In our experience, there is a lack of knowledge sharing within the NDIS market and its services around best practice and successful initiatives or methods of service provision. We suggest that embedding incentives for services and providers, grounding the building of collective knowledge, could work to improve outcomes for individuals across the sector.


Recommendation 13

10.2 The Salvation Army recommends that the Independent Review Panel consider the benefit of including the following factors in improving safety and outcomes for NDIS participants:

- **Approaches which are aspirational, individual and empowering,**
- **Accountability and transparency, and**
- **Building collective knowledge of the sector.**



11 Conclusion

- 11.1 The Salvation Army thanks the Independent Review Panel for the opportunity to provide a written submission to the NDIS Review.
- 11.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from 

The Salvation Army Australia Territory

August 2023



Appendix A About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country. Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services
- Child and family support services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at: <
<https://www.salvationarmy.org.au/>>