

Review of NDIS Costs
Productivity Commission
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www.pc.gov.au/inquiries/current/ndis-costs

To whom it may concern,

We thank you for the opportunity to provide a submission to the Productivity Commission's Review of NDIS Costs.

The first part of the submission discusses the role of volunteering in the NDIS and addresses the following questions raised in the Issues Paper:

- Is there any evidence of cost-shifting, duplication of services or service gaps between the NDIS and mainstream services or scope creep in relation to services provided within the NDIS? If so, how should these be resolved?
- How has the interface between the NDIS and mainstream services been working? Can the way the NDIS interacts with mainstream services be improved?
- Is the range and type of services proposed to be funded under the ILC program consistent with the goals of the program and the NDIS more generally?
- What factors affect the supply and demand for disability care and support workers, including allied health professionals? How do these factors vary by type of disability, jurisdiction, and occupation? How will competition from other sectors affect demand (and wages) for carers? What evidence is there from the NDIS trial sites about these issues?
- Is increasing the NDIS workforce by 60 000-70 000 full time equivalent positions by 2019-20 feasible under present policy settings? If not, what policy settings would be necessary to achieve this goal, and what ramifications would that have for scheme costs?
- How might assistance for informal carers affect the need for formal carers supplied by the NDIS and affect scheme costs?
- What is the capacity of providers to move to the full scheme? Does provider readiness and the quality of services vary across disabilities, jurisdictions, areas, participant age and types/range of supports?
- What are the barriers to entry for new providers, how significant are they, and what can be done about them?
- How will the changed market design affect the degree of collaboration or co-operation between providers? How will the full scheme rollout affect their fundraising and volunteering activities? How might this affect the costs of the scheme?
- Are there other ways the scheme could be modified to achieve efficiency gains and reduce costs?

The second section addresses the NDIS participant planning process and responds to the following questions:

- Is the planning process valid, cost effective, reliable, clear and accessible? If not, how could it be improved?
- How should the performance of planners be monitored and evaluated?

About Inclusion Melbourne

Inclusion Melbourne is a community support organisation that provides services to people with an intellectual disability, helping them to create more enjoyable and rewarding lives and participate fully in the community. Inclusion Melbourne was established in 1950 and remains the only registered disability support provider to have transformed its services during the life of the previous Victorian State Disability Plan (2002-2012), resulting in the sale of our premises and the delivery of all of our supports within the community, alongside community members.

Our vision at Inclusion Melbourne is for people with intellectual disability to live in an inclusive community, where everyone has the same opportunities to participate in community life and to take their place in society as respected citizens. We believe our role as a disability support provider is to encourage and enable people with disability to achieve and maintain a valued quality of life. We accomplish this by supporting people to create highly personalised and flexible lifestyles based on their needs and desires. To accomplish this we encourage people to participate in activities and develop relationships with people within their local community.

Volunteering is a vital part of the social policy model underpinning the objectives of the National Disability Insurance Scheme. Through volunteering, a person with a disability can break out of the mould of a 'service user'. Volunteering provides an entry point for engagement between people with and without a disability. In addition to creating social inclusion, relationships and friendships, for some people volunteering also provides a pathway to employment, whether that be a for person to commence working in the disability sector or for a person with a disability to gain access to employment through the personal networks of supportive volunteers, such as with the assistance of a Circle of Support (for more information on Circles of Support refer to <http://www.inclusiondesignlab.org.au/what-weve-learnt/circles-of-support/>).

Volunteers also represent one of the primary mechanisms for moving people with a disability from passive recipients of service to social inclusion. As such we are concerned at the current simplistic level of debate in relation to supporting volunteering within the NDIS and the uncertainty pertaining to funding inclusive volunteering models. Through supporting and encouraging volunteering, Inclusion Melbourne and other innovative disability organisations across Australia provide significant social and financial gains for people through supporting and leveraging volunteer supporters. These initiatives have the potential to achieve greater economic and social inclusion outcomes at or below the funding levels required when utilising paid staff alone.

Failure to articulate a clear strategy, including ensuring adequate transition support for volunteer including organisations will have significant impacts on people with a disability, current and potential volunteers and those disability support organisations who have developed service models focussed on connecting and individually matching volunteers to people with a disability for the purposes of increasing social participation and decreasing social isolation; and also for those disability supporting organisations that link and support people with a disability to gain volunteer roles so as to participate more fully within our community.

The NDIS reforms will see the disability sector (1) changing from block funding of disability service provider organisations by governments to individualised funding for people with disabilities based on individual needs assessments and (2), ditching Australia's old welfare and charity model of disability funding, replacing it with a legislatively guaranteed "insurance" model whereby all Australians who meet the eligibility criteria are legally entitled to NDIS funding for all 'necessary and reasonable' supports.

Information, linkages and capacity building

It is important to see ILC as an integral part of the NDIS. Successful implementation of ILC is key to the overall goal of the NDIS to increase opportunities for people with disability to take part in

the Australian economy and society. Successful implementation of ILC is also integral to the sustainability of the scheme in the long run.

All Australian governments agreed in mid-2015 to the ILC Policy Framework. The National Disability Insurance Agency has been given responsibility for implementing the policy, which outlines two broad aims for ILC:

1. To provide information, referral and capacity building supports for people with disability, their families, and carers that are not directly tied to a person through an individually funded package.
2. To partner with local communities, mainstream and universal services to improve access and inclusion for people with disability.

This policy framework identifies five activity streams:

1. Information, linkages and referrals
2. Capacity building for mainstream services
3. Community awareness and capacity building
4. Individual capacity building
5. Local area co-ordination (LAC).

These areas of work reflect the governments' shared view of the most effective ways of increasing the social and economic participation of people with disability. It also explains the intended scope of ILC. This is important as in the future the Agency will only fund activities that fit into one of the five streams. This means, for example, that ILC funding will not be provided to organisations to help people with daily living activities such as assistance with shopping or cooking because these types of activity do not fit within any of the five activity streams. This has impacts on disability support organisations who have service models built around connecting volunteers to people with a disability for the purposes of increasing social participation and decreasing social isolation; and also for those disability supporting organisations that link and support people with a disability into voluntary roles.

Volunteers

Volunteers are unpaid community members, supported through a not-for-profit organisation, who contribute to the social inclusion of people with disabilities. 'Not-for-profit organisations are the vehicle through which volunteers provide a community benefit. Volunteering is distinguished from paid work' (Volunteering Australia 2006). A distinction can be drawn between 'informal volunteering' which is what people do in their private lives to, for example, assist a neighbour or friend; versus formal volunteering, which is orchestrated through an organisation. Volunteer programs are an active and supported means to involve community members in the lives of people with disabilities. Natural or informal supports do not depend on organisations as an intermediary.

Volunteers make a significant contribution to society and the economy. Volunteers were estimated to provide a volume of work equivalent to 14 per cent of paid jobs in Victoria, with the value of volunteering across all sectors estimated at over \$16 billion to the Victorian economy. Of this, formal or organised volunteering through organisations is estimated at around 40 per cent of volunteer time, with the remainder provided through informal volunteering arrangements. Women are more likely to volunteer than men however, on average, men provide more organised volunteer hours per year.

Formal volunteering is the connection of an individual to a charity, with whom they then undertake a wide range of tasks, being careful to not displace the role of a paid worker, as per the Volunteering Australia code of conduct. As the NDIS is intended to result in wide scale market reform, it is anticipated that the number of charitable providers will decrease and this

will have implications particularly in regional areas where there will be less opportunities for willing citizens to commit to volunteering with a local charitable disability support provider.

Advantages of volunteers for the NDIS

Volunteers have potential to contribute substantially to the goal of the NDIS to increase social and economic participation of people with disabilities. Volunteers can contribute beyond what staff and family members can achieve alone. Research consistently shows that volunteers can:

- Reduce social isolation and improve mental wellbeing of vulnerable people in ways that could only partially be met through paid staff or family. That is, involving volunteers in people's lives can reduce loneliness, and reduce mental health costs.
- Extend the effectiveness of formal services: both cost and impact: that is, formal funds go further – even after costs for volunteers are taken into account.
- Challenge the assumption that the only response to staff shortfalls is more paid staff about the need for workforce expansion and the predictions of workforce shortfalls.
- Strengthen the capacity of the community sector to provide informal support as/when/if volunteering relationships through a CSO translate to informal community support.
- Provide safeguards for vulnerable people through building relationships with community members (for example, Klees 2005; Montclair 2011).

A successful approach to volunteering and social inclusion

The Inclusion Melbourne approach provides personalised support to each person with intellectual disability, furthering opportunities for employment and volunteering, learning and education and social participation. The foundation of this approach is staff who know each person with a disability very well and recruit, train and support volunteers. Inclusion Melbourne has a track record of being more effective, that is, enabling more social participation, and more efficient, that is, achieving more with same funds than comparable approaches relying solely on paid staff. through volunteering, inclusion melbourne strives to:

- Develop personalised supports for individualised lives
- Provide a range of support to maintain each different relationship with a community member, including support to family members (typically but not exclusively parents), the person with a disability and the volunteer
- Provide support to the relationship as long as needed by the volunteer, the person with a disability and/or his/her family. Inclusion Melbourne recognises that the volunteer and person with a disability may choose to move on
- Increase the amount of effective support available for each person to pursue activities, hobbies and ongoing learning while at the same time increasing the number and nature of various informal social relationships
- Make each person's resources extend to achieve a full and vibrant week – to have no more than 50% of a person's weekly support provided through paid supports
- Provide opportunities for community members to participate
- Provide volunteering opportunities for people with / without an intellectual disability
- Connect people with a disability to a community activity, interest or to pass time
- Increase awareness in the community of people with a disability

Inclusion Melbourne's volunteering program has the following objectives:

- For people with disabilities, to access volunteers to

- Experience a more inclusive lifestyle through the development of social relationships, usually initiated through a common interest or activity or education and learning
- Have greater opportunity to be present in the wider community
- Have social relationships, including friendships with members of the community which are personalised and flexible, not based on payment. These can be enduring or task specific and are mutually beneficial, such as shared enjoyment of art or building of skills
- Have a valued role in social relationships, and not only as service recipients
- Continue to develop skills relevant for various social relationships and personal relationships, coping skills, processing emotions, strategies, problem solving
- To be contributors to various valued roles
- For family members (typically parents) to:
 - Recognise the importance for their son/daughter in forming attachments and involvement with community members
 - Develop trust in community members: recognise community members want to spend time with their family member
 - Educate families about the value of volunteers
 - Lift family horizons about what is possible in the wider community
 - Know about/ recognise the role volunteers have with their family member
 - Support the family and build skills and relationships for family member
 - Have a 'break' as a consequence of the time spent between a volunteer and their family member
- For volunteers as members of the community, including people with disabilities, to:
 - Recognise the value of diverse personal relationships
 - Experience opportunities and benefits of spending time with a person with an intellectual disability: to build relationships, to build community
 - Be better connected in a way that increases emotional wellbeing and health, and personal development
 - Contribute to meaningful and valued community work – to give back to the community
 - Further progress their priorities for personal development and experiences which could contribute to education, social skills development, and employment opportunities
 - Develop additional roles / opportunities beyond initial activity tasks

Providing reasonable and necessary support

Volunteering is consistent with the provision of reasonable and necessary support. For participants in the NDIS, their funded support hours can be achieved with fewer dollars while extending opportunities for social and economic participation

Through supporting and encouraging volunteering, the people supported by Inclusion Melbourne gain value for money from individual funding packages and potentially achieve greater economic and social inclusion outcomes for fewer dollars. We are currently undertaking economic analysis to test this approach, however the following figures give an indication of the

effectiveness and significant savings generated by systematised volunteer supports. In 2014-15, Inclusion Melbourne:

- Supported 209 volunteers (including 26 people with intellectual disability) to work with 80 people with intellectual disability
- Delivered 14,464 volunteer hours of direct support to people with intellectual disability
- Spent only \$186,500 on volunteer management to obtain \$833,770 of value (based on the NDIS 1:1 support rate)

Following careful investigation and consideration, it is apparent that some current service types, such as those delivered by Inclusion Melbourne, will not be funded under the current bilateral agreement between Victoria and the Commonwealth. There has been no detailed consideration of funding models to determine whether volunteer coordination can be incorporated within an individualised funding approach. Without a clear response from the NDIA as to how volunteering will be funded, models of support that provide social participation and community inclusion such as that offered by Inclusion Melbourne are in danger of disappearing.

Further, the pace and timing of the rollout of ILC sourcing may have a devastating effect on volunteer including organisations. Without a clear strategy to inform people with a disability and families of the current costs of State (block) funded services, as well as advising Local Area Coordinators to inquire about any volunteer supports that may be in place, organisations may find that existing clientele are ineligible for future services as they remain unaware of the need to request funding to provide for volunteer establishment and ongoing maintenance, supervision and training. In some cases, organisations may not be able to survive a gap in excess of one year before being able to tender for ILC funding to provide these services (if they are to be funded via ILC).

Of greater concern is the potential demise of volunteer supports in organisations such as Inclusion Melbourne due to the costly reliance on paid support staff in the 1:1 NDIS core supports framework.

Inclusion Melbourne and others developed and disseminated a survey to collect data regarding the use of volunteers in directly supporting people with a disability. The survey was disseminated in late 2015, with responses analysed in early 2016. Utilising existing networks it was sent to a wide range of registered disability support providers across Victoria. There were 54 respondents representing 47 separate Victorian organisations, all of whom supported volunteers within their organisation.

A total of 5,175 volunteers were engaged and supported by the 47 organisations who responded to the survey. Of those volunteers, 4,073 (79%) are directly supporting people with a disability. 11,124 people with disabilities were directly supported by respondent organisation's volunteers.

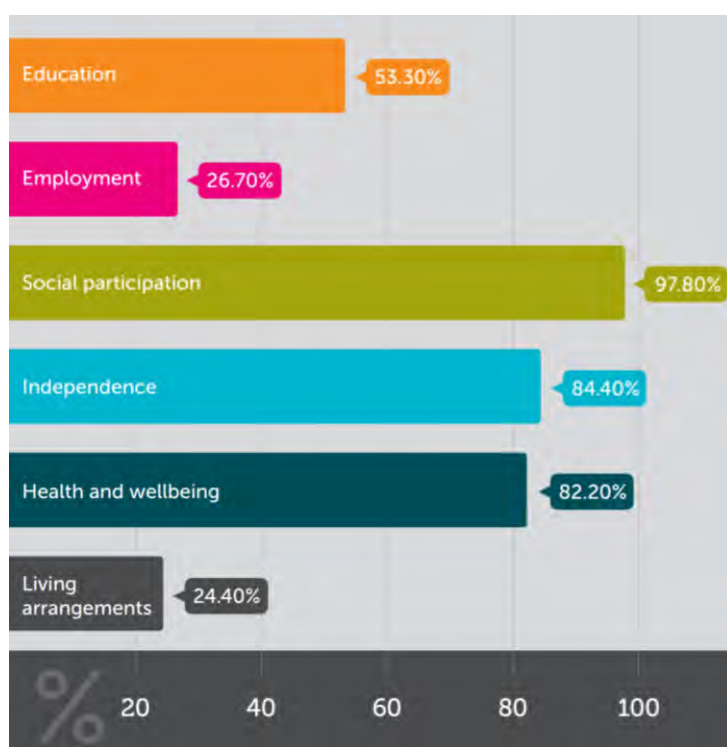
24 organisations provided an estimation of volunteer sourced support hours. There were 370,475 hours of direct support provided in the 2014 / 2015 year. If these organisations are representative of other organisations it could mean that volunteers in Victoria are providing in excess of one million hours of direct support to people with a disability. It is unknown how many of Victoria's 312 registered disability organisations engage volunteers in the direct support of people with a disability, although the number is likely to be significantly greater than the sample of this survey. These results show the enormous reach of volunteers and the significant place they have in the community and the delivery of supports and services to people with a disability. Clearly volunteers form a significant part of the disability service sector and consideration and effort given to maintaining the existing social capital.

Respondents to the survey reported that volunteers performed the following direct support roles:

- One on one support in the form of community access and inclusion, mentoring, friendship, and skill development work.
- Leading or supporting activities such as groups, social events and camps
- Skills based volunteering (eg. counselling)

Volunteers in direct support roles contribute across all the key life areas of education, employment, social participation, independence, health and wellbeing and living arrangements. See Figure 1.

Figure 1: Percentage of organisations whose volunteers support the achievement of key life areas.



The difference between volunteers and paid staff

It is widely accepted that there are differences in benefits and outcomes between using paid staff and volunteers for community inclusion and participation for people with disability. 83% of respondents have observed differences. The positive differences noted include increased social connection and community participation, genuine relationships and the value of lived experience. The respondents' comments regarding this include the following:

'Volunteers and the people we support often develop stronger connections than that of paid staff.'

'The relationship can be different, not time based or output focused. [The relationship is] more fluid and changes with the needs of the individual.'

'The child, young person and family usually feel genuine friendship and care ... it is a friend, not just a 'carer'... and friendships are sustained beyond the life of our programs.'

'Volunteers have more time to give for social interaction, therefore increasing much needed social networks for people and meaningful relationships are formed by sharing common interests, values and goals. This extra time and attention leads to improved self-esteem and general wellbeing as well as providing life enhancing opportunities and experiences for those people accessing our services.'

'For some people volunteers can be the only ones in their life who aren't 'paid' to be with them.'

'Participants know that volunteers want to be part of their lives without payment to be involved.'

'Volunteers are viewed more as chosen contacts than staff...'

'Volunteers are members of the general public who can help break down stigma - they tell their friends and family about their volunteering and it helps to widen people's understanding. They're passionate and motivated.'

'We utilise a diverse range of volunteers from 14 - 76 years of age. We will not have this diversity with only a paid workforce. Volunteers make a valuable contribution to the organisation with the supports they provide and also provides them with value and purpose. It is a beneficial arrangement for the clients, organisation and volunteers.'

The demise of disability focused volunteering?

It is unclear how and if volunteer based services, such as those represented in the survey are to be funded under the NDIS. The lack of inclusion of volunteering in the foundational philosophy of the NDIS and the exclusion of line items for volunteer management in the NDIS Price Guide are very concerning and represent a real danger for loss of social capital. With no clear pathways for transition, this leaves organisations floundering and without clear messages to give people with a disability and their families currently supported by volunteers. There is a wide spread concern from organisations about the impact of failure or delayed transition of programs into the NDIS where volunteers directly support people with a disability into the NDIS.

There is a danger of losing thousands of volunteers and hundreds of thousands of hours of support to people with disabilities unless this situation is resolved. For the NDIS to avoid inadvertently limiting or destroying the very social capital it wants to promote that enables people with a disability to enjoy real community inclusion and vital support, urgent action must be taken to establish appropriate funding models for volunteer services providing direct support for people with a disability

Some organisations have developed a volunteer capacity alongside other services, which are not government funded. A mechanism to include and understand the scope of existing volunteer services is also required. Anecdotally, some of these programs are being lost in the NDIS launch sites as organisations concentrate their efforts on transitioning to the NDIS. Further stories exist of volunteers being supplanted by paid workers, in contrast to the objects of the NDIS legislation.

Effectively recruiting, screening, assessing, training and managing volunteers to work with vulnerable people and achieve meaningful outcomes takes significant work and resourcing. It should not be seen as a cheaper option but as a vital part of building a community that is inclusive of people with a disability. Volunteer services also sit alongside and integrate with other disability services. Inclusion Melbourne believe that effective volunteer support must sit within disability or specialist organisations who understand the required focus of support and can train and support volunteers to effectively help people achieve outcomes.

There are two aspects of volunteering that require separate detailed consideration in relation to supporting and growing volunteering in the NDIS. The first is *supporting people with a disability to become volunteers*, while the second is *encouraging others to volunteer to support people with a disability*. The NDIA should seek to determine how best to fund support for both of these activities.

An additional complication is that the ILC commissioning framework assumes that other services remain static and do not alter their existing funding and policy levers. Already, funding for volunteer resource centres (VRCs) is stretched and the 2016 Federal budget made \$12 million of cuts to federally funded volunteer services. Should other state and local governments

follow this lead, support to volunteering will be significantly disrupted. In June 2015 ABS data revealed that participation in volunteering had declined for the first time in almost 20 years in Australia, falling by 5 percent.

Inclusion Melbourne has a high profile and strong bonds in both the volunteering and disability sectors in Victoria and while Inclusion Melbourne supports approximately 2 volunteers for every person with an intellectual disability that we support, less than 1% of our volunteers have been referred to our organisation via a VRC. Therefore, how will ILC funding support greater connection between VRCs and disability support organisations? Further, will VRC funding be cut or redirected away from supporting connection to disability support organisations once ILC funding is available? Conversely, what impetus will a VRC have to support a person with a disability to become a volunteer if VRC contracts explicitly exclude support for people with a disability, leaving this to those organisations that obtain funding via ILC to provide these activities?

We recommend that the ILC sourcing process clarify NDIA expectations in relation to fostering improved connections between registered providers and volunteer resource centres.

Funding volunteering for people with a disability and the NDIS

As previously outlined, there are a range of ways to fund volunteer coordination and support for people with a disability within the NDIS:

1. ILC funding
2. Participant funding
3. A combination of the above

Option 1: ILC funding

ILC funding is intended for the delivery of nonindividualised, capacity building that strengthens the capacity and adequacy of both disability specific and mainstream service providers, and by implication, the entire community. ILC funding for volunteer including organisations would enable a focus on capacity building and community engagement with volunteers in order to facilitate NDIS participants with ready access to a pool of trained and safety screened volunteers. ILC funding would be congruent with the commission requirements for ILC, namely that in order to be able to apply for funding, ILC activities must:

- Fit in one of the 4 ILC policy areas
- Fit into one of the 5 priority areas listed in the commissioning framework

However, ILC funding is not intended to be utilised for the provision of an ongoing support to an individual person. Given the requirements for pre-employment screening for staff and volunteers in place in Victoria and other jurisdictions and the need for other quality safeguards, including incident reporting and revised criminal records checks on a three-yearly cycle suggests a level of involvement beyond that intended by the scope of ILC.

Social capital is a collective set of social relations that, when taken together, make possible what would have been impossible without those relations. Communities high in social capital are well-connected and exhibit mutually reciprocated trust, and as a result have access to greater amounts of collective potential. Volunteering is a strategy used by progressive organisations to seek to create relationships and friendships between people with and without a disability, in order to create this social capital and the benefits it brings.

It is acknowledged that there are two types of social capital: bonding and bridging. Bonding refers to the type of social relationships that occur within families, close friends, and other tight-knit groups. Bonding social capital might be similar to social or familial support, and draws its strength from a shared set of norms, values, and expectations.

Bridging social capital refers to connections made among people who are familiar with but not close to one another – for example, acquaintances, co-workers, or co-members of an organization. Bridging social capital often involves a connection between two separate groups, and represents a link through which information, values, and ideas can flow.

The underpinning philosophy utilised by volunteer supporting organisations is to support bonding activities. By recruiting on values (as well as other attributes), organisations seek to create durable links through engagement in sustained, repeated activity. However, at present these activities sit outside of the scope of the ILC activity streams but sit within activities funded within Tier 3 of the system (eg: meeting a person at home to assist them to prepare a meal, or to go to the shops or a recreational facility together). It is through this repeated exposure to each other that services create and support connection that leads to the establishment of friendships and therefore social capital. Within Inclusion Melbourne, the roles may be arbitrary, as our aim is to create friendship and the activity is the vehicle to promote this. However, under the current approach to ILC this type of volunteering support is not permitted.

Option 2: individual participant funding

Theoretically, elements of the volunteer programs could be funded on an individualised basis. An example of a similar approach is that of government funding for employment outcomes with payments made upon commencement and at regular markers through the establishment of the employment relationship. Analysis of successful volunteer including organisations would enable accurate setting of pricing and rewards, with the ability to structure and vary payments throughout a funding cycle to prevent rorting of the system. This approach would encourage organisations to develop sophisticated and effective volunteer support mechanisms and training to reduce volunteer turnover and churn, recognising that a large proportion of costs are incurred in the initial recruitment, selection, matching and appointment of the volunteer. In this model it would be expected that costs reduce over a 3-, 5- or 7- year timeframe if adequately supported during establishment and the early years, as well as continuing to provide ongoing training opportunities, recognition and ad hoc support. Such an approach assumes that there is a correlation between years of service and likelihood of continuation of further service.

A concern with implementing individual funding is the extent to which this approach would adversely affect the volunteering premise. Direct payment for the service changes the underlying relationship so that it is no longer volunteer based. As a paid, rather than voluntary service, the willingness to volunteer may be changed, and the generation of reciprocity and friendship forfeited.

Often, dozens of hours are invested in recruiting and commencing a match only to have it fall over for a range of reasons outside of the control of the organisation. Under an individually funded approach, the organisation and/or the participant would be negatively impacted. Likewise, the organisation would be unable to claim for funds in months where a volunteer takes a break (eg: due to childbirth, exams, new job or holiday) but may still be incurring or amortising costs associated with the volunteer (eg: requirement to obtain a new criminal records check or undertake a quality assurance requirement).

Because the ability to make a successful match is highly variable and uncertain, the practicality and feasibility of individualised funding may be problematic. Without base funding, organisations lack the certainty required to employ professional volunteer coordinators and therefore the capacity to recruit volunteers and deliver the service where it is requested by individual participants.

Option 3: combination

A third funding option is a combination of ILC funding and participant funding. In this approach, ILC funding could be used for those activities that are arguably beyond a single NDIS participant, such as to publicise, source and provide core training to volunteers, support of waiting lists, innovative development and quality improvement, while participant funding could

be used for service components specific to an individual such as matching and assessment, non-transferable volunteer training, support, reviews and so forth.

Planning

Planning creates the framework for action, and a thorough planning process will provide NDIS participants with a comprehensive action plan for their future. The NDIS plan is a goals-based plan, a concept which is new to many participants with intellectual disability. To develop an inclusive plan for participants a number of considerations need to be made:

- What is currently occurring in the individual's life?
 - Is this adequate? If not what needs to change?
- What are the goals and aspirations for the individual's life?
 - How can these be achieved?
- What are the priorities for the individual's life and are essential to the plan?

The NDIA has stated that *choice and control* are key factors in their planning process, and that participants are empowered to make their own decisions about their supports and the management of their funding arrangements. Historically choice, goal setting and the truly personalised planning required to reach goals have been denied to people with an intellectual disability so greater support is required to assist participants to determine and communicate their goals accurately.

Planning for people with a disability and the NDIS

There is a range of ways to assist and ensure that the NDIS planning process for individuals with an intellectual disability is inclusive:

1. Adequate planning supports
2. Clear and accessible planning process
3. Face-to-face planning meetings
4. Draft plan review

1: Adequate planning supports

The NDIS planning workbook (2014) suggests that the planning process is simple and requires an individual to "make a cup of tea and have a think about where you would like to get to" for each of the NDIS domains. This is very vague, brief, and does not outline a clear process for making realistic and achievable goals, which decreases the accessibility for participants with an intellectual disability.

Inclusion Melbourne currently spends an average of 7 hours with each person we support, and their family or carers, to support them to set SMART goals, and complete pre-planning activities to determine the amount and types of supports required to reach these goals. This is a stark contrast to the 1 hour over-the-phone planning meeting that some participants are being offered.

It is unjust that NDIS participants without strong support networks may not have the opportunity to be supported to determine and express their life goals in a meaningful way to an NDIS planner. As NDIS plans are individualised and tailored to the life of an individual, those without support to plan will almost certainly be disadvantaged.

2: Clear and accessible planning process

Providing a clear, accurate and updated step-by-step planning process supports individuals, families/carers, and supporting organisations to be well prepared for the roll-out in their area.

There has been a lot of anxiety within the general public, future NDIS participants, and their informal supports about the NDIS roll-out and the planning process.

The NDIS has produced documents which outline vaguely the topics that will be covered in a planning meeting, and much more can be done providing comprehensive planning resources, and guidelines for evidence that may need to be collected regarding specialist therapies. Not only would this support many participants and their existing supports to understand and be able to navigate the planning system, it could potentially improve cost effectiveness by improving the quality and accuracy of NDIS plans without necessarily increasing the workload of an NDIA planner or LAC.

It is important to consider that planning documentation should be accessible in-language for participants and their supports that may have low English literacy skills.

3: Face-to-face planning meetings

Face to face NDIS planning meeting provide an opportunity to fulfil the NDIA planning and assessment principles, in particular, the following 3 principles:

- 2.b Be directed by the participant
- 2.h Be underpinned by the right of the participant to exercise control over his or her own life
- 2.j Maximise the choice and independence of the participant

It is our experience that interviewing participants over the phone has produced inadequate NDIS plans for participants. It is not uncommon for an individual with an intellectual disability to have difficulty in advocating for themselves, and while all participants are entitled to a face-to-face meeting upon request, they may not ask for this option despite being more appropriate than a 1 hour over-the-phone planning interview.

Many participants have found it beneficial to include current support networks, such as family, supported accommodation house managers, and key support staff to be involved in their planning meeting, something which is impractical to expect over the phone.

4: Draft plan review

Reinstating the original draft review process is a more accessible process to review a decision for a person with a disability. Currently participants are required to lodge a request for a review of an NDIS plan should they find their plan inadequate or incorrect. This plan review process provides NDIS participants with opportunity to review the goals, needs and evidence presented in the planning meeting, allowing for clarification and improvement.

Participants with an intellectual disability and those who have difficulties in advocating for themselves in particular may not be aware of, or have the capacity to use, this formal process of review without support. Having a draft review process within the initial planning process **before plans are approved** would prevent the complications of post-approval reviews noted above. This would ensure that NDIS participants are receiving adequate and appropriate supports to reach their goals.

Draft plans should be made available in-language for participants and their supports that may have low English literacy skills.

Monitoring and evaluation of NDIA planners

Conceptually, the planning process represents one of the most pivotal links in the NDIS chain. The pre-planning supports provided to potential participants, noted above, and the planning meeting must be supported by a continuous quality improvement model that goes beyond incidental feedback. Feedback from participants and their accompanying supporters about experience and process during the planning and initial engagement phase of their NDIS journey must be encouraged. Anecdotally, there has been an inconsistency of planning style from NDIS

planners, particularly in relation to accuracy of details recorded, professional conduct, and receptiveness to evidence.

For feedback to be easily gathered from participants, channels would need to be easily accessible, uncomplicated, and fully supported by a communications strategy. This could take many forms:

- Automated feedback resources sent to the participant and/or key contact;
- Instant feedback post-planning using accessible surveys
- Follow up conversations with an impartial feedback representative after the planning process has been completed
- Transparent reporting of feedback analysis on the NDIS website

For accurate, open, and honest feedback, important factors to consider are the anonymity of respondents, and the timeliness in which feedback is requested. Anonymity allows respondents to experience perceived safety and will reduce response bias – where individuals may feel that leaving negative feedback will negatively impact their NDIS plan. Recall bias can be reduced in respondents by encouraging feedback soon after the participants' experience in the planning process as details may be distorted with time.

We thank you for the opportunity to provide a submission to this Review.

Yours sincerely,

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