



Submission to:

**Productivity Commission Inquiry
into NDIS Costs**

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Ms Kylie Stokes
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Board Chair

Introduction

Sharing Places Inc is an ACT based, not for profit disability service provider, providing community access and social participation support for adults aged from 18 years who have severe to profound disability. Our clients have very high and complex needs and require full time support and intervention. All clients accessing Sharing Places have a primary intellectual disability, requiring 24/7 intensive support. Our clients present with high and complex needs in the areas of mobility, challenging behaviour, communication, personal care, PEG feeding, seizures, self-injurious behaviour, sensory disorders, and dual disability disorders. Sharing Places is the only disability service provider in the ACT catering to such a diverse set of needs.

Sharing Places recognises that each of our clients is an individual with different needs and desires. Sharing Places works closely with our clients, their families and other agencies in developing and delivering individualised supports within a variety of community settings. Individual plans are developed between our clients, staff, families and carers and other disability service providers. These individual plans include specific and detailed strategies and skills development against goals from a range of learning domains. Sharing Places works to see individuals achieve self-determination in all those matters important to them, and strives to remove those barriers that prevent people from participating fully in our community.

Sharing Places currently supports 150 people across 11 support teams in the ACT, with each support team having access to a team base and wheelchair accessible vehicles. Sharing Places employs permanent staff members (both full time and part time) due to the complexities of the people we support and the need for specialist knowledge management across the organisation. This is also essential for workers to build relationships based on trust, as people with high and complex needs can only achieve their goals when they are in environments where they feel comfortable to take on challenges.

Response to Inquiry Questions

Sharing Places has a number of issues that have been observed by Sharing Places and discussed with participants and their families. These include:

NDIS Planning Processes

- People with intellectual disabilities and very high and complex support needs are not understood by NDIA. People with high and complex needs would greatly benefit from a more in depth assessment and planning process. In many cases, there is ample evidence for the required supports, however this is no longer being considered by the NDIA and, unless families are extremely vocal and effective advocates, people with very high and complex needs miss out on required supports.
- People with high and complex support needs have extremely differing needs depending on their individual characteristics and circumstances. These people

require complete flexibility and price deregulation within their NDIS plans . The current processes tie people in too much to supports that might not fit their needs. Applying the current approach of reference packages is not appropriate for people with very high and complex needs as their support needs can vary so much.

- The speed of the NDIS rollout is making it impossible for participants and service providers to communicate with the NDIA, as they are so busy and not contactable. Some examples are that calls go unanswered, messages are not returned in a timely manner and some messages are not returned at all.
- The NDIS does not require progress to be recorded against a person's goals if the support provided is a core support in a group, however, in order for a person to get the best quality active support, all participants need to work towards achieving their personal goals and this cannot be measured if progress is not recorded.

Cost Pressures

- Large inconsistencies can occur across plans for people with similar needs. This can arise for a variety of reasons including: a lack of consistent training for planners leading to divergent support outcomes, more experienced planners understanding how to obtain better outcomes for participants and more recently, pressure on planners from government to keep costs down. It may also be due to different informal supports being available for some people, or individuals having varying levels of aspirations requiring different supports.
- Items that are being included in support plans may not necessarily match those that have been requested by participants, leaving a shortfall in one budget while another budget remains unspent.
- Increasing package costs may be due to participants now having more opportunities to access services.

Intersection with Mainstream Services

- There is a misconception about accessibility to mainstream services for people with very high and complex support needs. This misconception arises out of a belief that all mainstream services are able to become accessible to people with very high and complex support needs, however this is not true. People with high and complex support needs generally require services to have a level of disability knowledge and experience. In some instances, it would require a large investment by mainstream services to become accessible and if there is no incentive, it will not occur. In the meantime, effective interaction between mainstream services and people with very high and complex support needs is facilitated by disability service providers on an individual basis.
- There are currently no active Local Area Coordinators (LACs) in the ACT, but it is anticipated that they will not be able to adequately support people with very high and complex needs due to the resources involved.

Market Readiness

- Sharing Places has previously made good use of the Regional Sponsored Migration Scheme (RSMS) for a number of reasons including a minimum qualification requirement. Sharing Places has previously sponsored a number of employees who are still with the organisation. Under the NDIS, the RSMS is not as accessible because the RSMS requires full time position when, under the NDIS, there are not as many full time positions available. This is causing more pressure on Sharing Places' recruiting especially around attracting people with qualifications. It would be more helpful if the RSMS requirements were more flexible in line with the NDIS.

Other Issues

There are a range of other issues that are causing pressures on the Sharing Places moving forward and remaining sustainable and effective. These include:

Absence Policy

The NDIA's absence policy is systematically unfair to people with disabilities. In addition, the policy creates an unacceptable increased financial risk for disability service providers. People with high and complex support needs generally face a higher incidence of illness than the rest of the population, therefore their rate of absence is consequently higher. The eight days of absence in a year that is provided for through the NDIS is grossly inadequate and inconsistent with the incidence of absence experienced by the individuals who receive funding. Indeed, eight days absence is not even comparable to the absence rates of generally healthy people in the workforce, who received some four weeks of paid sick leave per year.

Further, as noted, disability support services like Sharing Places require a permanent and highly trained staffing cohort to support and to care for our clients. A permanent staff requires a stable revenue regime. The stability of that revenue regime and our ability to operate is compromised by the absence policy – our staff still need to be paid regardless of whether or not our clients are able to attend our service on a particular day. Where a particular client has exhausted their eight days of absences, the financial cost must be worn by the organisation, not by the individual because that individual still has an associated cost to the organisation through staffing.

Sharing Places is of the view that the number of absent days should be increased to recognise the high and complex needs of people living with severe intellectual and physical disabilities.

Quality Assurance

Sharing Places is the leading disability service in the ACT for people with high and complex needs. Since the NDIS was implemented on 1 July 2014, the organisation has been constantly reviewing processes and implementing changes in line with the Business Rules and scope of the NDIS. There have been a number of changes to the way the organisation conducts its business and to the value added initiatives that were once common practise.

The full effects of these changes will still be unfolding for some time to come, and the organisation will need to be extremely vigilant in monitoring its performance against quality standards. This is especially difficult in the ever-changing environment of the NDIS and the unknown elements of the Quality and Safeguarding Framework.

Staff Training

There have been significant changes in the way that Sharing Places trains its staff due to the need to provide staff with very specialised training because of the types of high and complex support needs, but there being no money for training under the NDIS. Sharing Places has a very thorough induction process that ensures all staff are confident and effective in supporting people. This is costly but essential for the safety of our clients, staff, and members of the public. In relation to ongoing training, the organisation has had to forego eight days of training per year for all staff and it is unlikely that these will return. These extra training opportunities were especially utilised for innovation and knowledge sharing, and this is a significant issue for the organisation moving forward.

Sustainability

Solving the current issues with the NDIS is essential to the future sustainability of disability service providers and the system as a whole. These issues go to the heart of the future financial viability of disability services providers like Sharing Places.

Sharing Places and other disability support services need system certainty, a fair pricing model, and proper cost coverage to ensure that they have a solid financial base. If organisations do not have certainty and a solid financial basis, then the entire NDIS system will fall apart because there will be nowhere for people with high and complex support needs to go. If this happens, Australia will return to a situation where people with disabilities are prevented from engaging with and being part of their communities – something that is a fundamental human right.

Sharing Places also notes that changes to the NDIS, even the smallest of changes, have huge implications for the organisation and the people it supports. The moveable feast that is the current environment has caused much strain and uncertainty for disability services providers. Sharing Places urges the inquiry to consider how constant changes to the system impact on disability services providers and their ability to continue to provide services.