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Submitted online

FECCA's submission to the Productivity Council's National Disability Agreement Review

Introduction

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing Australia's culturally and linguistically diverse (CALD) communities and their organisations.

FECCA provides advocacy, develops policy and promotes issues on behalf of its constituency to Government and the broader community. FECCA strives to ensure that the needs and aspirations of Australians from diverse cultural and linguistic backgrounds are given proper recognition in public policy.

FECCA supports multiculturalism, community harmony, social justice and the rejection of all forms of discrimination and racism to build a productive and culturally rich Australian society. FECCA's policies are developed around the concepts of empowerment and inclusion and are formulated with the common good of all Australians in mind. FECCA works with organisations that advocate for people with disabilities from CALD backgrounds, including the National Ethnic Disability Alliance (NEDA).

FECCA thanks the Productivity Commission for the opportunity to provide comment on the National Disability Agreement Review. FECCA's response addresses selected questions from the consultation paper.

FECCA would welcome the opportunity to expand on this submission as required. For enquiries please contact FECCA CEO Dr Emma Campbell

Background: Australians of CALD background living with Disability

In 2015, almost one in five Australians reported living with disability (18.3% or 4.3 million people).¹ More than 1 million people living with a disability in Australia are from CALD backgrounds.² In other words, CALD individuals constitute close to a quarter of the total number of people in Australia living with a disability.

¹ Disability, Ageing and Carers, Australia: Summary of Findings, 2015
<http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/4430.0main+features202015>

² National Ethnic Disability Alliance, *Disability Employment Services (DES) Consumer Engagement Project* (June 2014), 4, accessed at: http://www.neda.org.au/images/reports/NEDA_DES_PROJECT_2014.pdf

Australians living with disability who identify as CALD may face compound vulnerabilities based on their disability coupled with their CALD background, immigration status, gender, migration experience and socio-economic status. Considering the large proportion of people with disability from multicultural backgrounds, and the diversity of needs across migrant communities, it is essential that the specific issues faced by this cohort are given due consideration.

CALD Australians have relatively low levels of awareness of disability support services including the NDIS. For example, the 2015 FECCA Multicultural Access and Equity Report found that 35% of the CALD Australians surveyed were unaware of government funded disability services.³ Other research has found that:

- CALD Australians are under-represented among consumers of disability services
- Many CALD consumers and carers face difficulties understanding and navigating the disability service system
- Lack of culturally and linguistically appropriate services present additional barriers to CALD individuals and their carers seeking support.

Question: How has the introduction of the NDIS impacted on access to services for people not eligible for the NDIS? Where are the main gaps in services outside the NDIS? What are the problem areas?

Most Australians living with disability are not eligible for services under the NDIS. The NDA therefore remains important in the delivery of disability services and in ensuring that mainstream services are inclusive of Australians living with disability, including those from CALD backgrounds.

There are many areas where individuals can 'fall through the gaps' between state run services and the supports available through the NDIS. The risk is higher during this period of transition and is compounded by a lack of funding to cover the costs of communicating with and supporting consumers impacted by the introduction of the NDIS.

Communicating with CALD consumers and carers can be complex. CALD Consumers and carers may have low proficiency in English, require face to face interaction, need an interpreter, or may only interact with support of family, a carer or an advocate. FECCA is aware that service providers have had difficulties contacting consumers to assist them in migrating from an existing service to the NDIS. Some CALD clients may find their existing service cancelled, without having been supported to move across to an alternative under the NDIS or otherwise.

'Gaps' have also arisen where individuals eligible for services under previous funding arrangements are no longer eligible for the service under NDIS rules. One example reported to FECCA relates to clients over 65 who were previously engaged in the NSW State Community Care Support Program (CCSP) service that will be replaced by the NDIS. These individuals were eligible for CCSP services based on receipt of a Disability Support Pension. However, they do not meet eligibility for the NDIS. While efforts are being made to find alternative services to ensure continuity of care, for many CALD communities there are no suitable alternatives. It has also been reported by some multicultural service providers that in migrating CALD consumers to the NDIS from services previously funded under state agreements, they receive less money for the provision of the same service. These not-for-profit, community organisations are covering any shortfalls from limited financial reserves to ensure continuity of service.

³ <http://fecca.org.au/wp-content/uploads/2015/06/Access-and-Equity-in-the-Context-of-the-National-Disability-Insurance-Scheme-June-2015.pdf>

CALD Australians eligible for the NDIS face significant barriers when trying to access the scheme. While beyond the scope of this consultation, they include:

- Complexity of the system
- Low levels of understanding and awareness among CALD communities
- Varying quality and low levels of cultural competence across LACs
- Shortage of CALD-specific or culturally competent service providers
- Lack of clarity around funding for translators and interpreters.

According to the NDIS National Public Dashboard, the status of active participants with an approved plan on the 31 December 2017 was around 7%⁴, which is significantly lower than actual need. It is critical that the NDA plays a role in providing services to CALD Australians who are eligible for the NDIS but find themselves unable to access NDIS services because of these ongoing challenges.

Question: What role could the NDA play in assigning responsibilities for addressing service gaps identified in the current arrangements?

The NDS is a high-level framework aimed at improving life for Australians with disability, their families and carers. This includes working to ensure that all mainstream services and programs across the country — including healthcare, education, Indigenous reform and housing — address the needs of people with disability.

As FECCA understands it, there is currently no overarching mechanism to monitor the implementation of the NDS including outcomes for vulnerable Australians such as CALD Australians. In our consultations, it was suggested that the NDA should be the mechanism through which gaps are identified and filled, responsibilities clearly delineated and the outcomes of the NDS are monitored, measured and reported. For example, the NDA should:

- Establish mechanisms for monitoring the implementation of the NDS and measuring outcomes
- Provide additional clarity on responsibilities for actions under the NDS, including the provision of services
- Establish mechanisms for accountability for achieving the outcomes of the NDS
- Establish mechanisms for monitoring outcomes for those living with disability who face intersectional challenges including those who identify as CALD
- Establish mechanisms to assist individuals who are caught in the middle of disputed accountabilities
- Established mechanisms for the national collection of data on outcomes under the NDS.

The NDA should remain central to achieving the goals of the NDS by: ensuring mainstream services are inclusive; the filling of service gaps; ensuring continuity of service; and driving initiatives that improve the lives of all Australians living with disability, particularly those who are ineligible for the NDIS, unable to access the NDIS or where services provided under the NDIS are not enough to meet their needs and aspirations.

⁴ <https://www.ndis.gov.au/medias/documents/dashboard-national-31dec-17/National-Dashboard-31-Dec-2017.pdf>

Question: To what extent does the NDIS (for example, through the provision of ILC activities and Local Area Coordinators) cater to people outside the NDIS?

Some CALD Australians not eligible for the NDIS are being supported by Information Linkages and Capacity building activities to link those individuals with appropriate services. FECCA understands that ILC activities are also intended to support mainstream services to be more inclusive of people with disability, to fund supports not directly tied to an individual and to educate communities on the NDIS.

Currently the ILC Framework receives a very small proportion of funding under the NDIS. It is the view of FECCA that the current ILC activities are not meeting the needs of Australians living with disability from CALD backgrounds. CALD Australians who wish to have support through the ILC to connect with disability services in their local area encounter:

- low quality service
- limited opportunities and options for appropriate services, training and other supports including CALD-specific services
- low levels of knowledge regarding the needs of CALD consumers
- low levels of cultural competence
- lack of knowledge of CALD specific disability supports or services.

Currently, participation in the ILC also requires a level of self-advocacy, consumer knowledge and capacity to navigate the disability service sector. CALD Australians may have lower levels of English language literacy, lower levels of knowledge regarding Australian government services and lower levels of knowledge regarding their rights. ILCs need to be better at supporting CALD Australians in accessing the services available to them.

More effort also needs to be made to support multicultural service providers to access ILC funding and as well in encouraging mainstream service providers to apply for ILC funding for services that meet the needs and support the inclusion of CALD Australians living with disability. FECCA would be grateful for information on the types of supports being funded under the ILC framework.

FECCA also urges work to improve the quality of service provided through ILC operators including efforts to improve levels of cultural competence.