



**Physical Disability Council of NSW**  
Ordinary People Ordinary Lives

**Submission for the National Disability Insurance Agency (NDIA)**

**Information, Linkages and Capacity Building Policy  
Framework Discussion Paper**

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## **Who is the Physical Disability Council of NSW?**

The Physical Disability Council of NSW (PDCN) is the peak representative organisation, of and for, people with physical disability across New South Wales. The Council has a majority of people with physical disability in its membership, its governance (i.e. Board), and employees. It is also a not-for-profit, non-government organisation.

The objectives of the Physical Disability Council of NSW (PDCN) are:

- To educate, inform and assist people with physical disabilities in NSW about the range of services, structure and programs available that enable their full participation, equality of opportunity and equality of citizenship
- To develop the capacity of people with physical disability in NSW to identify their own goals, and the confidence to develop a pathway to achieving their goals (i.e. self-advocate).
- To educate and inform stakeholders (i.e. about the needs of people with a physical disability) so they are able to achieve and maintain full participation, equality of opportunity and equality of citizenship.

The Physical Disability Council of NSW (PDCN) appreciates the opportunity to consider, and provide comment to the National Disability Insurance Agency.

## **Overview**

The Physical Disability Council of NSW (PDCN) thanks the National Disability Insurance Agency (NDIA) for the opportunity to respond to the Information, Linkages and Capacity Building Policy Framework Discussion Paper' (the discussion paper) and acknowledges that it contains valuable points in relation to the development of the community to support and promote inclusion, is a crucial element of long term societal change and may provide a cost effective way in which to harness supports rather than producing a total reliance on Individual Support Packages (ISPs.)

However, PDCN emphasises the need to recognise the value of the many organisations such as theirs, whose work already provides many of the functions described in the five streams of service, through individual and systemic advocacy, education and information provision and building capacity for self advocacy.

On a day-to-day basis many Non Government Organisations (NGO's) such as our own, work to connect individuals with a disability, their families and carers, to formal and informal services and supports throughout mainstream, private and community systems.

PDCN would like to make the following comments on the five streams of service under the ILC framework and suggestions made within the discussion paper, and whilst commenting on each area separately would suggest that these streams are more likely to be effective if interlinked in many cases, as opposed to being viewed in 'silos'.

## **1: Information, linkages and referrals**

PDCN recognise that information is an important tool in assisting people to make considered and informed choices. The discussion paper refers to information being presented in a variety of formats, including social media, online databases and technologies, PDCN would caution that the use of these technologies should compliment, rather than replace, face-to-face, written and telephone communication, as many people with a disability still lack the resources to access online technologies. Additionally information should be provided in a variety of language and accessible formats, such as braille, easy read and spoken formats, to ensure access for all community groups.

PDCN would also like to comment on the outsourcing of this stream of services, and would recommend that in order to ensure impartiality, that these services are provided by organisations that are not aligned with direct service provision.

## **2: Capacity Building for mainstream services**

PDCN agree that mainstream services are an integral part of the 'whole' when it comes the provision of services for people with a disability.

Whilst PDCN acknowledge that this is not a part of the NDIS scheme, PDCN believe that it is imperative that collaboration between the NDIS and other mainstream supports is essential to ensure both systems run effectively, and note that incentives may be necessary to ensure the participation of all sectors.

Sydney University's discussion paper on cross sector service coordination for people with high and complex needs also highlights this element.

*Cross-sector coordination is a critical scheme design element to ensure that NDIS participants get the range of services and supports they need to pursue their goals and participate in society and the economy. Any failure of other sectors to provide access to quality services will increase the costs of disability support and risk the sustainability of the NDIS.<sup>1</sup>*

PDCN would recommend that people with a disability themselves play a greater part in working with mainstream/government services to ensure their considerable lived experience is considered when working towards making these services more accessible, inclusive and responsive to the needs of people with a disability, and in identifying areas for local improvement.

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<sup>1</sup> Centre for Disability Research and Policy, University of Sydney (CDRP) and Young People in Nursing Homes National Alliance (YPINHNA) 2014. Service coordination for people with high and complex needs: Harnessing existing cross-sector evidence and knowledge, p1

### **3: Community awareness and capacity building**

PDCN acknowledges, and sees great merit, in investing in community awareness and capacity building to ensure communities become inclusive of people with a disability. PDCN believes this strengthens informal supports and promotes social and economic inclusion of people with a disability, and note that this aligns directly with the NSW Government's Disability Inclusion Plan 2015

*The NSW Disability Inclusion Plan supports the NSW Government's commitment to remove systemic and attitudinal barriers so that people with a disability have a better opportunity to live a meaningful life and enjoy the full benefits of membership in the community<sup>2</sup>*

Again PDCN would recommend the use of current NGO projects (such as the NDIA Disability Support Organisations Peer Support Project) and people with disabilities' invaluable experience to lead consultation and training in order to further build community awareness and greater understanding of need.

### **4: Individual capacity building**

PDCN support this stream and believes it is an essential element of sustained inclusion and positive social change, benefiting people with a disability and society as a whole. Equally choice and control is key to the person centred approach around which this framework is built.

Again, PDCN emphasises the need to recognise the value of the many organisations already in place, whose work and programs provide, and could continue to provide, many of the functions described in this stream of service.

A concern may be the emphasis on disability specific or diagnosis specific individual capacity building, which may inadvertently exclude those in need of information and support in absence of a diagnosis, or as they progress towards diagnosis. PDCN believe that this group would be covered by this scheme, however would recommend that this be better articulated in the policy parameters.

### **5: Local area co-ordination (LAC)**

PDCN recognises the importance of local knowledge and supports, however we would recommend clearer articulation on how this would be achieved in particular in rural and remote communities where isolation has further inherent problems.

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<sup>2</sup> NSW Government, NSW Disability Inclusion Plan 2015

### **Overall Comments**

PDCN acknowledge that this policy paper is a framework and not a detailed document, however PDCN recommend further detail is provided across a number of areas: -

The framework discusses the capacity to provide *one off low cost supports*<sup>3</sup> however no guideline is provided as to what these may be, and what is considered 'low cost'. Additionally '*reasonable and necessary supports*'<sup>4</sup> are also discussed in line with Individually Funded Packages (IFPs) with no clear suggestion of what will fall within or outside of this group.

PDCN recommends that outcomes for the five streams be addressed and articulated, in order to ensure that the goals of this framework are achievable and measureable, and can be tested and evaluated throughout implementation to ensure success.

PDCN also wish to comment on the current state of uncertainty for many advocacy organisations whose work already address many areas outlined in the five streams of the ILC framework. At present many of these organisations offer services that fall within a number of the five streams of the ILC framework, often overlapping. Funding for this group of organisations in NSW is no longer guaranteed after June 2016, and a concern for PDCN is the access to these services for people with a disability during the implementation of the ILC framework, especially given that no indication of timeframe has been provided within the policy document.

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<sup>3</sup> National Disability Insurance Scheme – A Framework for Information, Linkages and Capacity Building, p10

<sup>4</sup> National Disability Insurance Scheme – A Framework for Information, Linkages and Capacity Building, p 11