

Brotherhood of St. Laurence response to Victorian Disability Plan 2021–2024 Consultation

Introduction

The Brotherhood of St. Laurence (BSL) welcomes the opportunity to provide input to the consultation for the next Victorian Disability Plan.

BSL is an independent social justice organisation with strong community links that has been working to reduce poverty in Australia since the 1930s. The BSL has a strategic focus on building evidence-informed policies and practices that promote community inclusion and participation of all people, especially those experiencing exclusion or disadvantage. This commitment is reflected in our role as a LAC and ECEI provider for the NDIS in the North Eastern Metropolitan, Hume Moreland, Western Melbourne and Bayside Peninsula areas in Victoria. Our engagement in this planning and community capacity building is driven by the recognition that people with disability are among the most socially and economically excluded Australians.

Key considerations for the next Victorian Disability Plan

A great deal has been achieved under the 2017–20 Victorian Disability Plan, *Absolutely Everyone*, and in particular, we welcome the rights-based approach and focus on outcomes underpinning that Plan.

However, it is clear that much more needs to be done to achieve ‘an inclusive Victoria which supports people with disability to live the satisfying everyday lives’ that the Plan strives for. In particular, we raise the following current developments as considerations for the next Plan:

- **National Disability Strategies** – The federal government is currently consulting and developing the next National Disability Strategy (NDS) and a National Disability Employment Strategy (NDES), neither of which has been finalised yet. *Absolutely Everyone* identified the State Disability Plan as a key mechanism to achieve the targets of the NDS. It is critical that the Victorian State Disability Plan aligns with and reinforces the national strategies and targets, and facilitates the different levels of government to work together to advance inclusion and equity for people with disability.
- **Employment of people with disabilities** – Employment of people with disabilities must be a priority, especially in view of the impact of COVID-19, which we discuss in more detail below. The Victorian Inquiry into the On-demand Workforce found that people with disability are over-represented in platform-mediated, precarious work. *Absolutely Everyone* must ensure decent, sustainable

employment opportunities are present for people with disability that go beyond the binary of ‘employed’ and ‘not employed’ to discern the nature of the work available.

BSL believes addressing the disproportionate impacts of COVID-19 and recognising the changing nature of work will be crucial to breaking the cycle of poverty and economic precarity for people with disability. The Victorian Disability Plan must adopt the lens of ‘decent work’ as defined by the ILO as ‘opportunities for work that is productive and delivers a fair income, security in the workplace and social protection for families, better prospects for personal development and social integration, freedom for people to express their concerns, organise and participate in the decisions that affect their lives, and equality of opportunity and treatment for all women and men’ (ILO 2016a).

BSL has done additional work to advance the decent work discourse—notably, the inclusive employment framework which emphasises interconnectivity between employment, social, political, and environmental conditions (Bowman & van Kooy 2016).

- **Impact of NDIS changes** – The NDIS is currently undergoing the most significant reforms since its inception, resulting in significant upheaval and change within the disability community. BSL is concerned that the proposed changes will result in people being unable to access the NDIS or adequate funding to get the supports they need. This will necessarily increase the demand for mainstream and community support and health services. In addition, the intended scope of the NDIS Partners in the Community program for all people with disability has not so far been realised, limiting the essential work of connecting people to existing community supports. BSL is undertaking work in Victoria to capture the difficulties people with disability and without NDIS funding experience in accessing available community supports. BSL urges the Victorian Government to focus on building the capacity of community supports and breaking down barriers to inclusion.

BSL urges the Victorian Government in the next State Disability Plan to accelerate research effort and build data capacity to inform policy and program development, including understanding the situation of those not in the NDIS.

- **Reporting on the achievement of outcomes** – Through **Every Opportunity**, the Victorian Government set a target of six per cent employment of people with disability across all Victorian Government departments by 2020, increasing to 12 per cent by 2025. However there has not been an Annual Report since 2018 to identify the achievement of these and other targets, which must be addressed as a priority.

BSL comments on consultation topic areas

In addition to the overarching issues raised above, we also comment on two Consultation Topic Areas: ‘Supporting the interface between NDIS and mainstream services’, given BSL’s role in facilitating this interface as a Partner in the Community; and ‘Responding to COVID-19’.

Topic 5: Supporting the interface between NDIS and mainstream services

Our LAC and ECEI staff identified the following key issues:

- **Maternal & Child Health (MCH) Nurses:** An increasing numbers of children are being identified earlier through initiatives implemented by MCH (e.g. social & communication screening tool). In consultations with parents who have children with developmental delay (DD) and disability, many parents mentioned the positive support they received from MCH Nurses and the impact this had on family functioning. There were also negative comments about the variable support from different nurses, and some nurses’ reluctance to proactive in supporting referrals for assessments, rather recommending a ‘wait and see’ approach. Parents reflected on this ‘wait and see’ time as a lost opportunity to get more timely support for their child.

- State government rolling out of **3-year-old kindergarten funding**: This is an important opportunity for families where there is a child who has developmental delay (DD) or disability. We congratulate the state government for their strong leadership on funding two years of early education. At present families from vulnerable groups (Aboriginal and Torres Strait Islander background, prior contact with Child Protection, or refugee background) can get two years of free kindergarten for 15 hours a week. Extending the Early Start Program to include children with DD or disability would greatly enhance these children’s development, especially their social communication and emotional skills. It would mean they would be more likely to be ready for the transition to school.
- **Supporting kindergartens to work more effectively with families & their early intervention providers**: For ECEI plans to be implemented effectively, everyone involved in the child’s development (families, early childhood professionals and early intervention practitioners such as occupational or speech therapists) works together in a coordinated way. This ensures that identified approaches/strategies are complimenting each other within the different environments (home, child care/kinder, therapy space). This ‘team around the child’ approach is considered best practice, enabling Plans to be implemented in a coordinated and consistent way. For this to happen effectively, mainstream early childhood services (such as kindergartens) require additional resources to allow back-fill arrangements so their staff can attend the relevant coordination meetings, receive suitable professional development training and liaise with families—particularly those from CALD backgrounds.
- **Access to mainstream health services**: NDIS staff have reported that NDIS participants are often denied access to mainstream services they would be eligible for, such as allied health services, because they are identified as NDIS participants. This indicates a lack of knowledge on the part of staff in these services or the intention of reducing demand or costs, while also highlighting the often blurred lines between state-managed and commonwealth-funded service streams, and the impact of limited community capacity building work.
- **Transition to home from hospital**: BSL staff also note an apparent gap in NDIS literacy in relation to discharge planning from hospital. We support the Victorian Disability Advisory Council’s focus on optimising the role of Disability Liaison Officers and Units in hospitals and health networks, and urge the government to ensure outcomes in this area are included in the next Disability Plan.

Topic 7: Responding to COVID-19

The COVID-19 pandemic saw an increase in significant risks for people with disability and their families and carers. They experienced, and are experiencing:

- higher vulnerability to COVID-19 due to pre-existing health conditions and reliance on support workers
- disruption to essential supports and services particularly for those who struggle with online communication
- strain on families who can’t access respite or informal supports
- greater adverse impacts of social isolation
- increased economic insecurity.

In the longer-term the gap in social and economic participation for people with disability and their families and carers—already unjustifiably wide—could grow. Pre-existing issues such as low employment, social isolation and inadequate support could be exacerbated.

In addition, BSL LAC and ECEI staff identified the following key impacts:

- Mainstream services’ ‘back to basics’ model of **services focusing on core business**. Services were unable to consider best practice for inclusion and accessibility and unable to partner for seamless

service transitions to other stakeholders (e.g. to access supports to NDIS participants faced with family violence and child protection issues).

- **Demand on services/referral wait times:** Referrals for allied health and community health services exceeded demand, creating either long wait times or lengthy travel for basic supports.
- **Hotels for Homeless:** during COVID the *Hotels for Homeless* initiative provided an opportunity to support individuals experiencing homelessness with temporary to medium-term accommodation in hotels.
- **Economic goals:** Customised Employment and job carding to tailor jobs and/or self-employment to fit the skills, interests, strengths and support needs of the individual while meeting the needs of business/the market for a service or product should be incorporated in future employment strategies.
- **Importance of digital accessibility:** As online delivery of services seems increasingly the norm for many mainstream services after last year's lockdowns, the digital divide becomes even more crucial. We recommend the Victorian Government provide funding to bridge the digital divide and provide affordable computers, phones and other technology to ensure people with disabilities have equitable access to online resources, as was undertaken in aged care during the pandemic.

As we continue to develop 'COVID-normal' responses, policy choices must not only reconnect communities, but make them more inclusive. Enabling people with disability to participate fully in the community is the best safeguard against adverse impacts for them in future crises. It is also an economic imperative given the current and continuing impacts on the economy.

We look forward to the opportunity to work with the Victorian Government to further shape the next State Disability Plan and to work towards better outcomes and inclusion of people with disabilities in the Victorian Community.

If you would like to discuss our response to the consultation or have any queries, please contact me on smallett@bsl.org.au

Yours sincerely

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