



A disability supports ecosystem that leaves no-one behind

General Foundational Supports

Brotherhood of St. Laurence

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Summary

BSL welcomes the consultation on General Foundational Supports and the potential of these supports to transform the lives of people with disability, particularly those outside the NDIS. For the Foundational Supports Strategy to realise the vision of a disability supports ecosystem that will support a more sustainable NDIS, there needs to be adequate investment by government in Foundational Supports to meet the needs of the disability community.

BSL notes that the government has still not formally responded to the NDIS Review and have committed to releasing their response by the end of 2024. It is critical that the government advance NDIS reforms in a clear and coherent manner. This includes prioritising putting in place Targeted Foundational to ensure there are supports in place for people with disability outside of the NDIS.

BSL also notes the need for the Department of Social Services (DSS) and State/Territory governments to ensure the following is included in the Foundational Supports Strategy and implementation:

- physical locations where people can seek information and advice
- adequate investment in developing and implementing Foundational Supports so the government does not replicate the challenges of Tier 2 or the Information, Linkages and Capacity Building (ILC) Program
- access to localised, real-time information about disability supports in the local community including availability of the support, its accessibility and any costs associated with the service

- the integration of any new supports with mainstream services to form a proper disability ecosystem and ensure there is 'no wrong door' for people with disability to seek support.

1 The Brotherhood of St. Laurence and disability supports

The Brotherhood of St. Laurence (BSL) is a social justice organisation working towards an Australia free of poverty. Our purpose is to advance a fair Australia through our leadership on policy reform, our partnerships with communities and the quality of our services. Our approach is informed directly by people experiencing disadvantage and uses evidence drawn from our research, together with insights from our programs and services, to develop practical solutions that work.

BSL has operated as a NDIS Partner in the Community (PITC) since 2016. We are contracted by the National Disability Insurance Agency (NDIA) to deliver Local Area Coordination (LAC) and the early childhood approach in Victoria across the North Eastern Melbourne, Hume/Merri-bek, Brimbank/Melton, Western Melbourne and Bayside Peninsula areas. This work includes the building of community capacity and inclusiveness through place-based projects.

Our work in all these areas incorporates continuous improvement and learning at both organisation and system levels. This learning is based on what we observe, experience and monitor at the front line of implementing the NDIS and intersecting programs and services, and research and evaluations conducted internally and with university partners. We employ people with disability in our disability services and across the organisation. Working across systems enables us to have a birds-eye view of how multiple systems interact and what that means for the lives of people with disability.

2 NDIS reforms need to be advanced in a coherent and coordinated manner

BSL welcomes the opportunity to provide input into the Foundational Supports Strategy and the design and implementation of General Foundational Supports. However, BSL notes that the government has still not formally responded to the NDIS Review.

It is critical that government responds to NDIS Review findings to ensure reforms to the disability services and support ecosystem are advanced in a coherent, coordinated and transparent manner. Currently, the government has made changes to NDIS legislation and rules that affect people's access to and use of individual NDIS funding before alternative services and supports are in place.

Additionally, consultation on General Foundational Supports has commenced prior to development of Targeted Foundational Supports, which risks navigating people to supports that do not currently exist. These reforms are occurring in an order that risks leaving people with disability without the critical supports they need, and derailing the vision of a seamless disability supports ecosystem.

Research from the Melbourne Disability Institute (MDI) and BSL investigated how people with disability who do not have access to the NDIS find and use the support and services they need to

participate in society.¹ This research, cited in the final reports of both the NDIS Review and the Disability Royal Commission, found there was a significant gap between promoted availability and accessibility of supports and services outside the NDIS, and people's experiences of seeking and accessing them.² The research highlighted that the market of services and supports for people with disability is complex, disconnected and incomplete – and where services and supports do exist they are often unaffordable, inaccessible or unavailable.³

This inability for people to access disability supports in their local communities has also been reflected in a pilot BSL is undertaking testing the concept of a General Navigator role proposed in the NDIS Review (see overview of the pilot below).

BSL's General Navigator Pilot

This pilot is being undertaken in Hume (Melbourne) where ongoing socioeconomic disadvantage and presumed local need has been identified. The project is currently being delivered to individuals with disability currently without NDIS funding aged 18–65 years old.

The pilot seeks to trial a place-based model of disability support and service navigation and determine its effectiveness in the following:

- Facilitating access and establishing meaningful connection to community and mainstream supports.
- Improving wellbeing, self-confidence and community integration outcomes for people with disability.
- Increasing reciprocal and enabling relationships in community and individual support networks of people with disability.

Emerging insights from the General Navigator pilot have highlighted two key issues:

- **Limited disability supports:** Navigation to disability-related supports (General or Targeted Foundational Supports) has been difficult due to the limited availability of these supports within the community.
- **Basic needs:** Clients are largely seeking support for basic needs such as food, transport, housing and financial supports.

The insights demonstrate the importance of knowing whether disability-related supports are available locally, accessible and affordable to the person seeking them prior to providing information, advice and referrals. This is consistent with our Tier 2 research where people recounted that they were steered towards services with long or closed waiting lists, services that they could not attend, services they could not afford, services that were not culturally appropriate, services where they experienced discrimination or services for which they were ineligible.

The success of General Foundational Supports in supporting people with disability to access services that are relevant to their goals and needs and improving connection to the community is reliant on

¹ Olney, S, Mills, A & Fallon, L (2022). *The Tier 2 tipping point: access to support for working-age Australians with disability without individual NDIS funding*. Melbourne Disability Institute <https://apo.org.au/node/319016>

² *ibid.*

³ *ibid.*

the existence of inclusive mainstream services, and ensuring there are Targeted Foundational Supports for those with higher support needs that will meet their needs. General Supports will be of little use if mainstream or Targeted Foundational Supports needed by people with disability either do not exist or do not meet their needs and circumstances. The current planned approach of introducing General Supports prior to having Targeted Foundational Supports in place risks losing the trust of the disability community and the vision of a disability supports ecosystem.

Recommendation 1: BSL recommends government advance reforms to the disability supports ecosystem in a clear and coherent manner, prioritising putting Targeted Foundational Supports in place for people with disability outside the NDIS.

3 We need a new approach to delivering General Foundational Supports

Since 2013, the NDIS has changed the lives of many Australians with disability and their families for the better. However, the social change underpinning its insurance-based model – the inclusion of people with disability in mainstream social and economic activity supported by local information, linkages, capacity building and community capital to maximise their outcomes at every life stage and minimise lifetime costs – has not been realised.⁴

BSL welcomes the introduction of Foundational Supports to work alongside the NDIS and support scheme sustainability. However, the current proposal of General Supports mirrors the description of ‘Tier 2’ in the original design of the NDIS with no current detail on what will be done differently to produce better outcomes for people with disability.

MDI and BSL research in 2022 revealed that Tier 2 was not adequately resourced to meet demand, was underfunded and ineffective in helping people who were not NDIS participants to find support. Since this time, there are even more people with disability in Australia that will require access to General Foundational Supports. There are now 5.5 million people in Australia with disability who may need access to General Foundational Supports, with approximately 3.2 million of those being people under the age of 65 (including NDIS participants) who may need access to Targeted Foundational Supports.⁵

It is critical that the creation of General Foundational Supports does not replicate the shortcomings of Tier 2 or the ILC Program. There needs to be appropriate investment in General Foundational

⁴ Olney, S, Mills, A & Fallon, L (2022). *The Tier 2 tipping point: access to support for working-age Australians with disability without individual NDIS funding*. Melbourne Disability Institute
<https://apo.org.au/node/319016>

D’Rosario, M (2023). *Not a one-stop shop: the NDIS in Australia’s social infrastructure*, National Disability Services, Per Capita, Australia, 14 November.

Wilson, E, Qian-Khoo, J, Campain, R, Brown, C, Kelly, J, Kamstra, P, Crosbie J & Knox J (2021). *Informing investment design: ILC research activity – summary of findings*, Presentation, December, Centre for Social Impact, Swinburne University of Technology, Hawthorn, Vic.

⁵ Australian Bureau of Statistics 2022. *Disability, ageing and carers, Australia: summary of findings*. Available at: <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>

Supports that reflects potential demand, with scope to address fluctuating need over a person's life course. Additionally, the Commonwealth and state/territory governments need to not only resource Foundational Supports but also monitor and evaluate them to ensure they meet the needs of people with disability.

Recommendation 2: BSL recommends that the federal and state/territory governments ensure that General Foundational Supports are appropriately resourced to meet demand.

4 Leaving no-one behind – the need for physical spaces

BSL welcomes the focus on delivering General Foundational Supports through a range of different modes. Through our work as a NDIS PITS and through our place-based programs, we have identified that having a local, physical space that is staffed where people can go for information, advice and referrals is of critical value to people with disability, their families and carers.

This is particularly important for people who do not have access to digital devices, reliable internet or the digital literacy skills to access online information and advice. The 2023 Australian Digital Inclusion Index report highlighted that people with disability are more likely to be highly excluded from the digital world than people without disability.⁶ In addition, maintaining a quality internet connection for people with disability is more likely to cause affordability stress than for those without (meaning they need to spend more than 5% of their income to maintain quality, reliable connection).⁷

Providing physical spaces where people can go for support is essential to ensure people with disability are not left without access to reliable information, advice and referrals. Furthermore, these physical spaces must be accessible and embedded in local communities.

Recommendation 3: BSL recommends that the Foundational Supports Strategy includes a core component of local, physical spaces for people to visit if they need information, advice or referrals.

5 Localised, real-time information and advice

BSL welcomes the focus of the General Foundational Supports consultation paper on the type of information and advice that is most valuable to people with disability. People with disability are experts in their own lives, and any information and advice that is provided to people with disability should be tailored to their individual needs and circumstances. Additionally, it is critical that

⁶ Thomas, J, McCosker, A, Parkinson, S, Hegarty, K, Featherstone, D, Kennedy, J, Holcombe-James, I, Ormond-Parker, L & Ganley, L 2023. *Measuring Australia's digital divide: Australian Digital Inclusion Index: 2023*.

Available at: https://www.digitalinclusionindex.org.au/wp-content/uploads/2023/07/ADII-2023-Summary_FINAL-Remediated.pdf

⁷ *ibid.*

information provided is localised and provides up-to-date details and advice about services both disability specific services and mainstream services.

One of the key challenges that the NDIS Review highlighted was the unfulfilled potential of PITC to provide localised intelligence about disability supports, largely due to under-resourcing and NDIA priorities limiting PITCs' ability to dedicate time to collect information and support people with disability outside the scheme.⁸

It is critical that this is not replicated in the roll-out of General Foundational Supports. Information provided to people with disability needs to be accurate, relevant to their location and provide real-time intelligence on the accessibility, availability and any related costs of disability supports they are seeking. Government must ensure there are mechanisms in place in the implementation of General Foundational Supports to capture and report on local intelligence and trends and identify service gaps for people with disability.

Recommendation 4: BSL recommends that the Department of Social Services put mechanisms in place to capture and report on local intelligence and trends and identify service gaps for people with disability as part of the Foundational Supports Strategy.

6 Leveraging existing networks and a 'no wrong door' approach

For Foundational Supports to be properly realised they need to be effectively integrated with mainstream and community supports across the life course of people with disability. To do this, both Commonwealth and state government must provide further investment to support inclusion across multiple services systems to meet the needs of people with disability. This includes integrated service settings within mainstream systems, including:

- Early childhood education and care.
- Education: schools.
- Education: tertiary.
- Employment.
- Health.

It is also important to ensure that there are clear referral pathways leveraging the skills and knowledge of workers across mainstream and other services who specialise in disability support. For example, in a Victorian context this would include Maternal and Child Health Nurses, Preschool Field Officers and Disability Liaison Officers. Many of these workers are already in high demand, so further investment is needed to ensure there are enough staff to support referrals for Foundational Supports.

⁸ BSL 2023. 'Fulfilling the potential of Partners in the Community'. Available at: https://library.bsl.org.au/bsljspui/bitstream/1/13386/1/BSL_subm_NDIS_Review_Aug2023.pdf

Recommendation 5: BSL recommends that Foundational Supports are integrated into mainstream services and leverage the expertise of workers in existing key roles to provide information, advice and referral pathways.

Alongside integrating Foundational Supports into existing systems, it is also critical that if a person with disability seeks disability support advice from a mainstream service they are treated with a 'no wrong door' approach. Realising this approach requires service doorways, pathways and referral services to be designed so that people seeking disability support receive the assistance they need in a seamless manner regardless of where they 'enter' the ecosystem.

Recommendation 6: BSL recommends that the Foundational Supports Strategy includes a 'no wrong door' approach when seeking/providing supports.

7 Next steps

BSL would welcome the opportunity to meet with the DSS team developing the Foundational Supports Strategy to share our experience, research and evidence. We would be keen to discuss how BSL's work, insights and networks as and NDIA PITC and the pilot projects we are undertaking to test elements of the NDIS Review recommendations could inform the design and implementation of Foundational Supports.