



2019 FEDERAL BUDGET SUBMISSION

FEBRUARY 2019



2019 Federal Budget Submission

The expansion of the National Disability Insurance Scheme (NDIS) over the past year placed intense pressure on disability service providers. The NDIS is an inspiring concept, but the transition is imposing substantial financial pressure on service providers, compounded by inefficient systems and processes that are causing extra costs for service providers.

Reforms to the Disability Employment Services program (DES), while less radical than the NDIS, also presented providers with significant risks. Disability Enterprises were also challenged, by their transition to the NDIS as well as by the ongoing uncertainty about the wage assessment tool to be used with the Supported Employment Services Award and how wage increases would be funded.

The number of people receiving the Disability Support Pension (DSP) is falling. From a peak in March 2014 of 832,533, the number of recipients fell to 756,960 in June 2018. The task before the government is to ensure that more people with disability have jobs, whether in the open workforce or in supported employment.

The National Disability Strategy is a laudable document which carries the signatures of the heads of all Australian governments. The strategy is founded on sound principles and ambitions, but its capacity to drive action and new initiatives has proved to be very limited. It needs a higher profile and stronger impetus.

These complex and often difficult reforms are underpinned by principles which NDS and its members support. However, the reforms are difficult and many service providers are under stress. Their sense of uncertainty is exacerbated by frequent process changes, inconsistent advice, new regulations, delays on decisions, and difficulty obtaining the data they need to guide their operations.

To improve the lives of people with disability, progress is needed in three broad areas of policy:

1. establishment of a strong and dynamic disability support market, with effective market stewardship, to enable the successful implementation of the NDIS
2. expansion of employment opportunities for people with disability
3. advancement of the social inclusion of people with disability in areas including education and housing

This submission identifies actions that will drive improvements to the lives of people with disability, and their families and carers and help resource service providers meet the substantial need for disability support across Australia.

1. Assist the development of a strong and dynamic disability support market

The biggest challenge facing the NDIS is the availability of high quality supports to meet participant demand. Over the past year, as the transition to the NDIS has accelerated, we have seen growing gaps in supply. In addition to the concerns about the gaps in supply, a growing number of providers are re-assessing their place in the NDIS market.

Findings from NDS' recent survey suggest that 55 per cent of disability service providers believe that the overall operating conditions of the disability sector have worsened over the past year (up from 46 per cent in 2017 and 36 per cent in 2016). Fifty-eight per cent of providers agreed or strongly agreed that they were

worried they wouldn't be able to provide NDIS services at current prices and a similar proportion indicated that in order to provide services at the prices set by the NDIA, the quality of care would have to be reduced. They find staff hard to recruit, the policy environment uncertain, and they lack the working capital to grow and change.¹

Providers are frustrated with NDIS systems and processes. Over the past year, many have experienced long delays in payments, the NDIS portal is not user friendly, and the quality of NDIS plans is uneven.

As the Productivity Commission observed in its October 2017 report on NDIS costs, this environment is “highly challenging” for disability service providers. This report² echoes providers' concerns about the NDIA' price-setting. It says price-setting should be transparent, granular, evidence-based and timely – and that prices should be regulated only when there is clear evidence for doing so. It argues prices should be set primarily to boost market development, not to enable the NDIA to manage the budget. It recommends price-setting be transferred to an agency independent of the NDIA.

Unfortunately, there has been no action on this critical matter.

The NDIS is a once-in-a-lifetime reform that empowers people with disability to have choice and control over the supports they receive. Although it still has the support of the broad disability sector – people with disability, families and carers and service providers – further investment is needed if it is to deliver on its great promise.

- **Establish a Sector Investment Fund to ensure the NDIS delivers on its promise**

A Sector Development Fund commenced in 2012-13 and ran for five years. But the work required for a successful transition is not done. It makes no sense for the investment to cease when many in the sector – people with disability, families and carers, and service providers – are having difficulty operating in the new environment. Substantial further investment is required.

One percent of the annual full scheme (\$220 million) should be used to establish a Sector Investment Fund, to be implemented over a four or five year period. These funds would be used to address the transition priorities of people with disability, families and carers and service providers.

With respect to providers, the fund would be targeted at initiatives to build business capability, workforce availability and skills, and infrastructure investments to reduce overheads. Where it makes sense, it would build on and extend successful initiatives to make them widely available. It would target areas of highest risk, particularly small and medium-sized providers, those operating in thin markets, and those providing services to Indigenous people and people from culturally diverse backgrounds.

If established, decision-making on the use of the Sector Investment Fund would be managed through a collaborative mechanism comprised of government, NDS, and peak body representatives of people with disability and carers.

¹ National Disability Services, State of the Disability Sector Report 2019

² <http://www.pc.gov.au/inquiries/completed/ndis-costs#report>

- **Set NDIS prices through an independent agency that reflect the real costs of providing high quality supports and stimulate investment in growth**

Some NDIS prices don't adequately reflect the reasonable costs incurred by disability support providers. Market failure will occur if this continues.

NDS' strong view is that pricing should be revised to: reflect evidence-based adjustments in the Reasonable Cost Model that underpins prices, compensate for the additional costs imposed on providers by the design of the scheme (as well as for inefficient NDIA systems and processes), and include greater variation to reflect the impact of geography, complex support, transport costs and other factors. After five years, a trial of deregulation should commence in parts of the market.

And critically, the transfer of price setting to an independent agency needs to begin now.

- **Draw more on expertise in the sector**

In the haste to implement the NDIS, the NDIA's use of co-design diminished. While co-design can add time to the development and testing phase of an initiative, over the longer-term it produces a better outcome. Disability service providers have expertise the NDIA could draw on, which could reduce the use of consultants.

A challenge for the NDIA is how best to adjust or modify the NDIS to ensure it works in all areas of our diverse country and all types of supports. The knowledge of local service providers should inform where greater flexibility and local decision-making are necessary to ensure the scheme is effective, particularly in thin markets.

Important examples of where the input of providers is needed is in the establishment of effective support arrangements for participants subject to forensic orders, supports for participants with a history of violence, aggression and/or other very challenging behaviours, and for emergency responses. Providers are integral to developing appropriate and effective supports for these groups but their knowledge is rarely drawn upon. This needs to change.

- **Promote innovation and contemporary best practice**

To enable the NDIS and DES reforms to realise their promise of improved outcomes for people with disability, research and evidence are necessary. The NDIS, as an insurance based scheme, must be responsive to evidence of effective interventions and services. NDIS participants and people with disability seeking employment should be assisted to make informed service choices based on evidence about what works, under what circumstances and at what cost. Research, evidence and 'choice and control' should combine to become drivers of innovation and best practice.

The NDIA is developing a strategy to support innovation and contemporary best practice. NDS welcomes this development. To be successful, the strategy must engage closely with service providers, people with disability and their families and carers. It must recognise that the principal source of service innovation lies not within government but within the diverse non-government sector.

NDS, leading academics, consumer advocates and others have proposed a sector-led, collaborative research and innovation entity. Similar arrangements exist in adjacent sectors and other countries, with demonstrable positive effects. Federal Labour has proposed something similar to underpin significant education reforms. An

Australian disability research and innovation entity (with a focus on 'what works') would:

- establish priority research themes and develop and fund a research program directed at these themes
- co-ordinate programs of research that stimulate innovation and build knowledge, particularly to assist people with disability and their families and carers to make informed choices about supports
- assess the efficacy of various interventions and service practices; in particular their success at building the capacity and independence of NDIS participants over time
- disseminate and promote knowledge of best practice including through a repository or clearing house of research and related products (e.g. 'research to action' guides)
- connect researchers to people with disability and service providers to facilitate co-produced participatory or inclusive research

Through its Centre for Applied Disability Research, NDS has developed a disability knowledge clearing house, published Research to Action guides and commissioned an update of the Audit of Disability Research. These activities are embryonic and should be incorporated into a more ambitious national research and innovation entity with a sustainable funding base commensurate with the scale of investment in the disability support system.

• **Invest in Quality and Safeguarding**

To support the new NDIS Quality and Safeguards Framework, disability service providers need the capability and the capacity to build positive organisational cultures that focus on:

- preventing the abuse and neglect of people with disability
- person-centered approaches for diverse populations
- measuring and demonstrating outcomes
- maintaining effective quality management systems

Government investment in positive organisational cultures has been sporadic. Practical resources, developed with the financial support of state and territory governments and tested with providers, are available, but they need to be part of a national quality and safeguarding strategy. The key features of a national approach should be:

- support for organisations to determine whether their approach to quality and safeguarding aligns to the new expectations (using a mix of self-assessment and independent review)
- data collection through industry benchmarking
- the development of a central on-line hub of resources and educational activities that accelerate the spread and sustainability of best practice, including communities of practice

NDS led the development of the NDIS Worker Orientation Program in support of a nationally-consistent approach to building understanding of the NDIS Code of Conduct, but providers remain concerned about the costs of ensuring all staff can access the content. Providers are also concerned about the availability of experienced quality auditors and behaviour support practitioners. More broadly, the costs of compliance with the NDIS Quality and Safeguards Framework should be reflected in NDIS prices.

NDS Zero Tolerance Initiative

NDS' Zero Tolerance Initiative supports disability service providers to take a holistic approach to the prevention, identification and response to allegations and incidents of abuse and neglect in different service environments. It educates providers about the responsibilities that sit at every level of an organisation to promote human rights. It offers a range of tools and resources including online training, practice advice, workbooks, templates, videos and guides. The resources reflect evidence around what works, the actual experiences of people with disability, and practical feedback from disability service providers and frontline staff. Organisations can use the range of Zero Tolerance resources to take a whole of organisation commitment (from support workers to the board) to prevent and respond to abuse and neglect. Additional funding is required to extend the reach of this important work.

- **Develop and fund a disability data strategy**

Disability policy and practice must be informed by data and research. The introduction of the NDIS, with its emphasis on insurance principles and the efficacy of early intervention, highlights this point. Yet existing research funding and research capacity focused on service practice are inadequate to support the disability sector reforms. The 2014 Audit of Australian disability research found that the current disability research agenda lacks critical mass, is poorly co-ordinated and is disconnected from sustainable funding.

The Productivity Commission argues that more effective government stewardship of the NDIS is needed, adding that “the release of timely, market-relevant data are also needed urgently ... A better evidence base would enable a deeper understanding of the market and in turn, inform risk-based market stewardship responses.”³

Research and data are essential to inform government's market stewardship function and help service providers make investment and expansion decisions. They are also critical to understanding the impact of supports on the lives of people with disability.

NDS is pleased to see the recommendation in the Productivity Commission's latest report on the National Disability Agreement (NDA) for the development of an NDA Data Strategy for collecting, funding and reporting data. It is needed in order to provide a stronger accountability mechanism.

2. Expand employment opportunities for people with disability

Too many Australians with disability are being denied the opportunity to work or are discouraged from seeking work. In 2015, the latest figures available the workforce participation rate for people with disability of working age was 30 percentage points lower than for people without disability. The rate shows no sign of increasing – in 1993 it was 1.5 percentage points higher. Even more disturbing, the rate for people with severe or profound disability fell between 2012 and 2015, from 29.7 per cent to 25.0 per cent. The unemployment rate for people with disability in 2015 was twice the rate for people without disability.⁴

³ Productivity Commission, National Disability Insurance Scheme Costs, October 2017, page 40.

⁴ ABS 4430.0 - Disability, Ageing and Carers, Australia: Summary of Findings, 2015

Improving this bleak picture will require a concerted policy effort.

The causes are multi-faceted, but the situation will not improve unless the employment services system is equipped with the skills and resources required to optimise employment opportunities for people with disability. The role of Disability Employment Services and the NDIS are particularly critical.

Although most people with disability are not eligible for the NDIS, the NDIS does have a critical role in supporting people with severe disability. Enabling this population to gain and maintain employment is central to the NDIS's vision of social and economic inclusion and central to the insurance principles which underpin the scheme.

- **Introduce a 'work first' approach to NDIS planning**

The NDIS must do more to boost the employment rate of participants. At present, only one in five (22%) of NDIS participants aged over 15 says that the NDIS has helped them obtain paid work. Employment supports are included in only 5.3% of the plans of 15-24 year-old participants and just 2.2% of the plans of participants over 25 years. These figures must be lifted.

The NDIA is developing an employment strategy and the government has established a multi-agency taskforce to boost the employment opportunities of NDIS participants. NDS is keen to contribute to these initiatives.

An 'employment first' approach for people with disability of workforce age should be a central pillar of the NDIA's employment strategy. Planning discussions with participants should foster employment goals and explore employment options. Employment support should be included in the plans of all participants of working age unless they explicitly refuse it.

Knowledge among planners and Local Area Coordinators (LACs) about employment services and pathways must be improved through training and awareness-raising.

- **Build a growing, viable and diverse supported employment sector**

Disability Enterprises have the potential to provide more jobs for people with disability as the NDIS uncaps employment places, but Disability Enterprises are constrained by uncertainties.

The Fair Work Commission is currently finalising the review of the Supported Employment Services (SES) Award. The commission's decision will include a design for a new wage determination method for supported employment. The government, in its role as an interested observer in this process, should fund and assist in the design, testing and implementation of this new method.

Disability Enterprises are a critical service for people who do not have other employment options. They must be a sustainable option into the future.

Develop a pricing method that reflects the costs of employment

The current interim NDIS funding for supported employment is based on an average of existing Case Base Funding levels for a Disability Enterprise outlet. This is not sustainable in the long-term and disadvantages prospective employees with high-support needs.

A future pricing formula should reflect the realistic costs incurred in assisting employees who require different levels of support, along with the costs associated with the relatively low productivity of supported employees. Work to establish the NDIS pricing method for Disability Enterprises should progress with urgency, especially if it is to be introduced by 1 July 2019, as currently scheduled.

- **Boost disability employment through government procurement and direct employment**

Government purchasing can support the employment of people with disability and ensure Disability Enterprises remain strong and viable into the future.

The Department of Social Services is backing NDS' BuyAbility campaign to promote procurement from Disability Enterprises. BuyAbility encourages government and corporate purchasing from Disability Enterprises and provides a social impact measurement tool that calculates the net benefit of public spending on supported employment. DSS's funding ceases in March 2019. When the funding was provided it was expected that both the review of the SES Award and the new NDIS pricing mechanism would be completed. Neither has occurred, resulting in ongoing uncertainty in the sector.

Changing procurement practices takes time and a sustained effort. Initiatives by government to help drive these changes across departments would be welcome. Government departments should boost their purchasing of goods and services from organisations that have a demonstrable commitment to employing people with disability.

The Australian Public Service Commission launched its As One: Making it Happen disability employment three-year strategy in 2016. The As One strategy includes the action: Promote government procurement from businesses that employ people with disability. As yet, procurement across APS agencies is relatively low. NDS encourages government to renew its funding for the BuyAbility campaign to help advance this action.

Government agencies should also increase their direct employment of people with disability. The As One: Making it Happen disability employment strategy focuses on four action areas:

- expand the range of employment opportunities for people with disability
- invest in developing the capability of employees with disability
- increase the representation of employees with disability in senior roles
- foster inclusive cultures in the workplace

The most recent APS census for employment indicates that only 8.7 per cent of respondents report having a disability, up from 8 per cent in 2016. Clearly, there is considerable scope to lift this figure.

Stronger links between Australian Government agencies and the Disability Employment Services network, (with expertise and experience in supporting people with disability to prepare for and maintain open employment), would be an important step forward.

Give DSP recipients access to the work bonus

Supported employees typically rely on the Disability Support pension as well as wages. The interaction of the DSP and wages is critical in determining their income and structuring incentives to work. Minor modification of the DSP income test would ensure that employees retain more of their wages following any increase.

There is merit in extending the pensioner work bonus to people on DSP, most of whom are under Age Pension age. The work bonus is currently restricted to Age Pensioners and other pensioners over Age Pension age. The work bonus raises the income test threshold by \$250 per fortnight. Extending the work bonus to people on DSP would remove a disincentive to work, and would encourage employment. At present only 8.2 per cent of DSP recipients gain any income from paid employment.

- **Provide industry assistance**

The Department of Social Services made small grants available to Disability Enterprises for risk assessments associated with the NDIS. The grants assisted Disability Enterprises to obtain independent advice from consultancy services to help transition and business planning. While this funding was welcome, it was restricted to obtaining consultancy advice.

The adjustment ahead for Disability Enterprises is considerable as they move into the NDIS and respond to financial pressures, including the potential of higher wage costs resulting from the SES Award review. An industry adjustment package would include initiatives such as access to small grants, low-interest loans and funding for business line changes where a sound case is made. NDS recommends that the government work with the sector to develop industry adjustment actions for supported employment services as part of a larger disability services industry adjustment strategy.

- **Establish effective school-to-work transition**

International evidence suggests that young people with disability who undertake work experience or part-time employment while still at school enhance their later employment prospects significantly. This preparation is not happening in any systematic way in Australia. Currently young Australians with disability are mostly overlooked or excluded from activities that would improve their employment prospects.

NDS has been researching and testing school-to-work transition initiatives. These trials include [Ticket to Work](#) and the [West Australian Transition to Employment pilot](#), both of which have demonstrated success in helping young people with disability secure a future which includes employment.

- **Fund local Ticket to Work networks nationwide**

Ticket to Work is designed to improve the transition from school to adulthood for young people with disability. It brings together multiple stakeholders – including families, educators, employment services and employers – to work collaboratively to improve the longer-term employability of young people with disability.

Ticket to Work has assisted more than 1,000 young people with disability access the workforce, with 86 per cent of participants gaining post-school employment. In recent years, it has received philanthropic and Victorian State Government funding to support young people with disability to participate in after-school work.⁵

Unfortunately, the future of Ticket to Work is precarious as it relies on cobbling together time-limited grants, mainly from philanthropic trusts. It warrants a more predictable funding stream. Ticket to Work should be available to all young people with significant disability as they reach the stage at school when their peers are beginning to engage in work and plan for the future.

⁵ <http://www.tickettowork.org.au/research/study-shows-long-term-benefits-supporting-young-australians-disability-prepare-work/>

The program is delivered through local networks that include schools, employment services, post-school education and training providers and employers. To be effective, these local networks each need a coordinator. NDS recommends that Ticket to Work coordinators be funded across Australia to boost the employment outcomes of young people with disability.

- **Extend access to SLES and customised employment**

Currently, NDIS-funded School Leaver Employment Support (SLES) is only available to NDIS participants leaving year 12. That is too late for many young people with disability. In order to ensure more consistent and equitable provision of assistance for young people with disability, eligibility for SLES should be extended to all NDIS participants of working age before they leave school.

In addition, NDIS school-to-work transition supports should be offered on an automatic basis for participants from year 9 or 10, on an 'opt-out' basis. This is the approach taken by the successful Western Australian NDIS Transition to Employment pilot which provides customised employment assistance to students to help them take steps towards employment.

- **Adjust funding to reflect the cost of finding and maintaining jobs**

The new DES program, introduced in July 2018, involves increased consumer choice and competition. It also introduces a new 'risk-adjusted' funding model, which aims to align the effort required to secure a job with the payment which the provider receives. This is good in principle, but the model was introduced untested and early evidence suggests that it disadvantages some groups of job seekers, including people with intellectual disability and autism and Eligible School-Leavers. The latter are young people who, typically, have attended a special school or special class in a mainstream school. Under the previous DES program they attracted the highest funding level, under risk-adjusted funding they are attracting the lowest funding levels.

Although DSS is committed to adjust the funding model periodically in light of evidence about its effects, the delay in adjustment is likely to mean that damage is done well before action is taken to adjust the funding. Moreover, shifting funding from one cohort in order to assist another is a zero-sum game.

NDS recommends that the DES risk-adjusted funding model be more responsive to emerging evidence of disadvantage and that the funding pool be increased, rather than redistributed, to remove that disadvantage.

DES program funding in 2017-18 was just under \$870 million, while the budgeted program allocation for DES in 2018-19 is just under \$840 million. In the first four months of the new contract, the DES caseload has increased by over 15,000 participants. If this trend continues, there will be over 45,000 new DES participants in 2018-19, the largest increase since the uncapping of the program in 2010 and equivalent to the increase in total DES participants over the six years to mid-2018. Additional investment in DES is essential, rather than simply redistributing existing program funding.

While the new DES program's promise of fee indexation mid-term is welcome, this follows a decade of fees being frozen. As a result, government funding per DES user declined by almost 14 per cent in real terms between 2012 and 2018. Fees should be immediately boosted to enable DES providers to invest in the skill levels required to deliver improved employment outcomes.

- **Remove impediments to the provision of Ongoing Support in DES**

NDS is concerned that the provision of Ongoing Support in DES is hamstrung because providers' resources (and program funding) are redirected from service provision and support for workers with disability to compliance with unwieldy contract requirements of questionable utility. In October 2018, only 9 per cent of the DES caseload was in Ongoing Support, a decline from an already low rate of 12 per cent at May 2018.

NDS recently provided a detailed paper on Ongoing Support provision to the government. The paper identified opportunities to reduce red tape in the following areas: Ongoing Support Assessments at 26 weeks, proof of participants working at least eight hours a week, Ongoing Support Audits that fail to recognise variations in support over time across a caseload, and the requirement to suspend funding for Ongoing Support participants who are taking leave. If the recommended reforms to Ongoing Support are made, it would enable increased effort to be directed at supporting people with significant disability in work.

3. Drive inclusion and access through the National Disability Strategy

The ambitions of the National Disability Strategy complement those of the NDIS. Inclusive transport, technology, justice, housing, health and education systems are imperative for a viable NDIS that has capacity to increase the social and economic participation of people with disability. Implementation of the strategy will also reduce the cost of crisis services in the hospital, justice and income-support sectors.

The strategy requires a clear performance and accountability framework to ensure all sectors understand and do their part. In 2017, the Senate Community Affairs References Committee investigated and reported on the 'Delivery of outcomes under the National Disability Strategy 2010-2020 to build inclusive and accessible communities'⁶. NDS is particularly pleased to see a recommendation targeted at improving accountability:

The committee recommends that specific measurable goals for implementation of the National Disability Strategy 2010–2020 are created, that these are routinely monitored, and data is collected and reported biannually to the Disability Reform Council, the Office of Disability Strategy (if created) and presented to parliament. NDS would like to see this recommendation implemented as soon as possible and is pleased to see the Productivity Commission's recommendation for a biennial disability report, to be tabled in Parliament.

The Strategy requires concerted action by all governments across the six outcome areas which it identifies, including greater clarity on how the NDIS will interface with mainstream services across Australia. Below, we highlight just two areas that deserve immediate attention.

- **Commit to fully accessible education by 2020**

Children with disability require additional support in schools. NDS is pleased that the government has made progress on the implementation of a new funding formula for children with disability. As this new funding model is implemented, its impact needs to be monitored.

⁶ Available at https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/AccessibleCommunities/Report, viewed on 19 January 2018

Additional funding, however, is only part of what is needed. The following measures should be implemented to accelerate compliance with the Disability Standards for Education by 2020:

- make adherence to the standards a mandatory part of school registration
 - provide non-individualised funding to schools that is dependent on progress made towards disability action plans to ensure children with disability are welcome and supported in schools
 - educate school communities about disability inclusion and benchmark inclusive education with progress on disability action plans published on the 'my school' website
 - strengthen training for all teachers on the skills required to teach and include children with disability, and promote related professional development
 - ensure specialist advice is available, such as how to modify the curriculum for a particular child, promote positive behaviour for children with disability and reduce the use of restrictive interventions
 - establish joint planning between schools, families and the NDIA
- **Increase housing supply for people with disability**

The NDIS provides opportunity for substantial improvement in the quality of housing for thousands of people with disability eligible for the Scheme. Access to suitable, stable and affordable housing is critical to the wellbeing and employment of people with disability.

As part of the NDIS, Specialist Disability Accommodation (SDA) payments have started to flow. This should stimulate investment in housing for people with high and complex accommodation support needs (about 6 per cent of NDIS participants).

Many other NDIS participants will also be seeking affordable and accessible housing. NDS notes the COAG commitment in 2016 to “continuing to discuss potential reforms in this critical area, including efforts to improve housing supply and provide sustainable funding for homelessness services.” We also note the building ministers ongoing work on the costs and benefits of applying a minimum accessibility standard for private dwellings constructed in Australia. The introduction of such a standard is overdue.

The Commonwealth has a key role to play in encouraging the construction of affordable and accessible community housing for people with disability. Although the responsibility to address disability housing challenges is shared, the Australian Government can facilitate collaboration between all levels of governments, developers, community housing providers, disability providers, families and banks. Housing for people with disability needs to be on the agenda of all these groups.

NDS welcomes the recent announcement of the first funds (\$35 million) released through the Affordable Housing Bond Aggregator, managed by the National Housing Finance Investment Corporation. This concept of a new low-cost, long-term, government backed finance mechanism will help provide a certainty around low-cost finance for providing affordable housing solutions to many families that rent. We urge decision makers to prioritise people with disability for these rental properties.

February 2019

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National Disability Services is the peak industry body for non-government disability services. It represents service providers across Australia in their work to deliver high-quality supports and life opportunities for people with disability. Its Australia-wide membership includes more than 1000 non-government organisations which support people with all forms of disability. Its members collectively provide the full range of disability services—from accommodation support, respite and therapy to community access and employment. NDS provides information and networking opportunities to its members and policy advice to State, Territory and Federal governments.

