 

7 September 2021

**To:** National Disability Insurance Agency

**Email:** [agencypolicy@ndis.gov.au](mailto:agencypolicy@ndis.gov.au)

**Feedback on Consultation Paper: *An Ordinary Life at Home***

# About Introduction to Life Without Barriers

Life Without Barriers (LWB) is a charitable organisation supporting close to 23,000 people in over 400 communities across Australia. We provide people with the services and assistance they need so they can achieve their goals and maximise their opportunities to participate as fully in society as they wish. We partner with communities, elders, government and others to ensure positive long-term change for the people we work with.

We support a range of people including people with disability; children, young people and families; people with mental health needs; refugees; and people who are homeless. We were established close to three decades ago by a determined group of community members with a clear vision – to partner with people to improve lives for the better. Our foundational purpose carries us forward today as one of the largest national providers of social services in Australia.

LWB supports about 5,000 people with disability, primarily through the NDIS. LWB provides Supported Independent Living (SIL), daily living supports at home and in the community, support coordination, skills building/day activities and therapeutic supports to assist health and wellbeing.

We support over 1,400 people in SIL services in 440 outlets/group homes in every jurisdiction in Australia (except for the ACT), with 189 of the 440 homes having been transferred from the Victorian and NSW Governments. Overwhelmingly, LWB supports people with intellectual disability and many of our clients, especially in our SIL services, have high and complex needs.

# Response to the Consultation Paper

1. **Group Home Model**

The consultation paper (*Vision: page 4*) notes that group homes can be constructed around service provision “convenience” and that changes to the model have been slower than anticipated. This context is helpful to shape progress, but needs to be expanded so the full current context is understood. It needs to be remembered that the reality of

today’s context is that the group home model is a direct reflection of community sentiment, government policy and funding stipulations over recent decades.

Therefore, the success of reforms and the continued development of new options will benefit from, and indeed rely on, addressing these broader contextual issues. This places responsibility on the disability community (including the provider sector), supported and

led by the NDIA and government, to promote positive community attitudes and understanding on this issue; and in turn, develop new policy and funding arrangements.

As long-term mission-based stakeholders, service providers are able to partner with a range of others in this necessary work to make ‘an ordinary life at home’ a reality.

# The Role of Service Providers – Conflict of Interest

LWB strongly supports the fundamental right of people with disability to choose how and where they live. It is our mission to support people to make their own decisions and to choose how they live their lives. For many years we have supported and provided a range of home life options that not only provide security and safety but allow people with disability to explore new experiences and greater inclusion and participation in the community. As stated, LWB has particular experience with supporting people with high needs and intellectual disability.

The paper makes references to real or potential conflicts in respect of the roles of service providers. LWB understands and respects this issue. Core to the NDIS is to provide choice and control to participants and provider activities must support this at all times.

However, given the history and role of accommodation providers to date, addressing this issue must not be done in a manner that: (a) does not exclude the considerable expertise and input from providers; and (b) does not ignore the long-standing and trusted relationships between providers and participants.

LWB believes this issue requires further exploration - in the interests of ensuring comprehensive reforms and real future options that enable an ordinary life. LWB can point to considerable experience where, for example, we have worked under participants’ direction, to facilitate moves from group homes to more community-based options.

Because of our mission, history, expertise and trusted relationships with people with disability, families and others, we stress that service providers like LWB should be included in discussions regarding service arrangements, system changes and options for people with disability. We fully appreciate that service providers are not decision makers in any way, but service providers do have considerable and long-standing valuable expertise in supporting the life choices of people with disability.

# Market Stewardship

LWB supports the paper’s comments in respect of market stewardship. We believe that this role will be enhanced with further consideration to the interplay of the other roles of the NDIA, that is, plan approver, funder and policy maker. Therefore, this role must be undertaken in an open and transparent manner with the ability for input from a range of stakeholders.

The key stakeholder in this area must be participants and their families/representatives, but stakeholders must also include other government agencies (including jurisdictional agencies), the wider business community and service providers. Efficacy and sustainability should be considerations in this issue and providers have particular expertise in these matters.

Furthermore, LWB supports the broader availability of data to inform future investment in relation to home and living options.

# Other Issues

LWB firmly supports the direction of the paper, and in particular, the following:

* Greater flexibility in plans
* Focusing on supporting people at different life stages
* Early planning and specific arrangements for ‘exploration’ activities
* Expanding support for independent decision making.

The reform process could be further enhanced by:

* Consideration of the specific circumstances of people who are long term residents of existing services, especially those without families or other supports
* Specific consideration for people with significant and complex needs, for example, complex health care, forensic considerations or other specialist needs. The voices of these groups must be included
* Considering academic and action research work, including the work by Professor Christine Bigby from La Trobe University among others
* Consideration of existing service provider programs which provide community-based options.

Finally, we stress that transitions of people from group home or other environments need to be carefully supported. Imposed ‘step down’ models of support, with related funding and administrative requirements which do not align with individual needs or specialist recommendations, must be avoided to ensure the ongoing success of new arrangements.

# Appendix 1

To further assist, some information on our own Home and Living Project is attached.

We would be pleased to provide further details on our submission. Please contact Mr Chris Chippendale, Executive Lead Disability Engagement at [chris.chippendale@lwb.org.au](mailto:chris.chippendale@lwb.org.au) or on 0423 025 035.

Yours sincerely



Claire Robbs

# Chief Executive

**Appendix 1 – Life Without Barriers Home and Living Project**

In partnership with and at the direction of the people we currently support, LWB is undertaking a project to explore additional options of home living and how people with disability that we currently support can better determine how and where they live.

Over time, the project will engage with all LWB’s SIL residents in respect of their current and potential future living arrangements.

The objectives of the Home and Living Project are to:

* Bring choice and control to people with disability
* Provide contemporary home and living options that reflect the choices of people with disability
* Reduce the number of group homes with 5/6 residents
* Ensure that homes and physical environments are fit for purpose
* Have a greater range of homes of different sizes and configurations
* Ensure services are financially sustainable
* Partner with housing providers and other stakeholders to ensure people with disability have options equal to others to choose their place of residence and where and with whom they live.

The Project is focusing on addressing the barriers people with disability experience in choosing their place of residence, including consideration of where and with whom they live, the technology or modifications they require, and how they want to live their lives.

This initiative will see a progressive renewal of accommodation services provided by LWB, directed by people with disability.