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To Whom it May Concern

Re: Consultation Paper: An Ordinary Life at Home

Thank you for the opportunity to provide feedback and comments on the *Consultation paper: An Ordinary Life at Home*.

The Australian Foundation for Disability (Afford) is an NDIA registered provider offering disability supports, services, group and respite residential accommodation in New South Wales, Victoria, Queensland, South Australia and Western Australia.

The Consultation paper proposes contemporary living options for NDIA participants to have a choice on where they live and who they live with. Afford believe that everyone should have access to home and living opportunities and have the same equal opportunities as others, while understanding supports are necessary to live are provided at home without being dependent on paid staff. This opens up some questions/concerns on housing accessibility, time restraints and most concerning risks of abuse and neglect.

'An ordinarily life at home means a sense of belonging, safety and security'.

Afford provides the following feedback:

1. Lack of affordable housing

With the national housing market being a prime concern for average Australians, it is particularly difficult for individuals with a disability to access due to affordability, location, availability and suitability standards. When housing options are sourced, research has shown there is not enough funding for participants in their NDIS packages to fund their support budgets. AFFORD are finding there is an approximate 18% decrease in SIL packages from last financial year to the current year which puts strains on delivering needed supports to SIL clients.

Even with the increase for accessible housing options for the disability community, these are often expensive and not affordable both with NDIS funding and through the participants DSP resulting in the participant to source older rentals or continue to live in age care or institutional facilities or with ageing parents, against their needs or choice and control aspirations.

As a provider, the concern is how is the NDIA working with participants, families/carers and providers to make sure all housing options are thoroughly researched and implemented? And how are the NDIA addressing budget concerns to make sure all participants receive adequate and accessible services?

2. Reviews not being actioned in a timely manner/Time restraints.

In addition to the above concerns in regards to housing accessibility, the other concern is delays in plan reviews or changes of circumstances with the NDIA. As a provider with several vacancies across most states in Australia with SIL/SDA housing, the issue is not really finding a suitable participant to move in and start calling their chosen home - theirs, but the delays in funding from the NDIA to make this happen. SIL submissions are sent to the appropriate department within the NDIA, which is then taking months to even receive a response for approval or if need be, to provide more documentation for the participant. These delays are causing added stresses within families and most importantly with the participant who are wanting to start their lives in the new housing environment and cannot due to lack to NDIA communication. If further documentation is needed, again once sent to the NDIA by the provider/Support Coordinator, another few months have lapsed until a decision is made. The whole process could take from experience, 4-6 months from when the SIL profile and RoC with documentation is provided, to acceptance or decline.

There is an understanding in this consultation paper that the NDIA is working to reduce this issue with making funding more flexible however, the concern is more with getting the funding in a timely manner, than implementing funding once received.

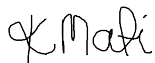
The other concern with flexible funding is, whilst you try to plan for future supports, what happens when unforeseeable circumstances occur? – changes in community participation supports, allied health, sudden decline in health, housing changes, ratio changes – if reviews are needed, and with the constant lengthy delays currently experienced with NDIA decisions, does the participant then draw from other funded services in the meantime, a form of taking from Peter to pay Paul scenario? Then what happens with the budgeted supports being used in the meantime to fund other areas of the plan?

3. Risk management and the concern of abuse and neglect

As providers with SIL/SDA housing there is a firm expectation of managing all risks for clients and staff -on an organisational level and within government platforms such as NDIA, NDISQSC and IAC. With ILO roll out, the concern would be when the participant moves in with a host arrangement, there is an expectation that the provider delivering supports are making sure all staff and the host are firmly vetted, inducted, trained and supported towards the needs of the participant however what controls can be put in place to make sure the person with a disability is safe financially, emotionally, physically and mentally? With ILO, particularly in host arrangements, it is an understanding that the provider does drop ins to check the welfare of the participant however, due to lack of presence, how assured can the provider be that the client is safe and secure if issues aren't raised during the visit or through weekly phone communications with the participant? What implications does this present to the organisation? The disability community are some of the most vulnerable members of society, so the concern for ILO (among the other stated concerns addressed) is making sure they are 100% safeguarded in all housing options.

Thank you for the opportunity to voice concerns that Afford have and should you have any questions, please do not hesitate contacting me

Kind Regards



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