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*MARKET READINESS FOR PROVISION OF SERVICES  
UNDER THE NDIS*

**QDN**

**QUEENSLANDERS WITH DISABILITY NETWORK**  
*NOTHING ABOUT US WITHOUT US*

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## About Queenslanders with Disability Network (QDN)

QDN is an organisation of, for, and with people with disability and the organisation's motto is "nothing about us without us." QDN operates a state-wide network of members who provide information, feedback and views from a consumer perspective to inform systemic policy feedback to Government and peak bodies. QDN also provides information and referral support to people with disability.

QDN has over 900 members across Queensland who provide QDN with the perspectives of people with disability.

## Value Statement on People with Disability

QDN's work in providing feedback and input into systemic policy issues is based upon the organisation's core values and the place of people with disability in an inclusive Australian society.

QDN believes that:

- All people with disability have a right to a place in the community and have contributions to make to community. This is as empowered, free citizens who are as valued, present, participating and welcomed as members of any dynamic and diverse society.
- The place of people with disability in the community is not just about people with disability having a house in the community. Core to this is that they are welcomed in the community as ordinary citizens where they are genuinely given opportunities to contribute and actively participate. People with disability need to be in communities where their individuality, their talents, and their lived experiences of disability are recognised and acknowledged.
- Culturally and historically, people with disability are not afforded the same value, opportunities or access to community life.
- Any inclusion in community for people with disability is conditional and vulnerable to withdrawal.
- Many people with disability in Queensland are excluded from the most basic experiences of ordinary lives.
- Current exclusionary practices are unacceptable and must be challenged.
- These issues affect not only people with disability but the whole community.
- The responsibility is shared. It lies within government (federal, state and local) and the community at large, to ensure that people with disability have a place and are resourced to belong in community.

## Introduction

QDN supports the introduction of the National Disability Insurance Scheme and the benefits to people with disability, particularly for 45,000 Queenslanders who have never received any specialist disability funded support before. QDN acknowledges the significant work required to introduce a national scheme, with this size, scale and timeframes, and understands that the National Disability Insurance Agency (NDIA) is working to address the issues and concerns that have been raised by people with disability, families/carers and providers to deliver equal outcomes for participants.

Given Queensland's roll out time frames, and the staged phases of roll out commencing in regional, rural and remote communities, with the metropolitan areas to transition in the final year, QDN's direct feedback of experiences is mainly from regional and remote areas where the Scheme has started in Queensland. However, QDN believes the key issues that are being experienced on a smaller scale in regional areas will be amplified when the remaining 60,000 Queenslanders in metropolitan areas start accessing the Scheme.

People with disability and their families have expressed that they need more information and assistance to access the Scheme and activate plans and ensure they are properly resourced, both at transition and beyond, to act as empowered customers in this new market environment.

In Queensland, to date, resources have been allocated by the Department of Communities, Child Safety and Disability Services investing in participant readiness activities to provide information about the scheme, and what people need to start to think about in their plans. This participant readiness has focused on front end access and pre-planning, however, once people register for the Scheme, Queenslanders with disability are reporting that they do not know how to activate their plans, what options are available for managing their plans and how to access the right supports, aids and equipment. In the first year of roll out in Queensland 70% of people with disability are agency managed with only 7% fully self-managed. These figures are an indication of how confident people with disability feel about plan activation and managing their own supports.<sup>1</sup>

QDN strongly asserts that people with disability and their families require targeted capacity building, education and mentoring that is delivered in an accessible and inclusive way to enable people to operate as active consumers in this new market driven environment. While the NDIS brings choice and control to people with disability and their families and carers with regards to how, when, where and from whom they purchase their supports, it also places increased responsibility upon participants. The way the scheme is currently being delivered also makes an underlying assumption that people with disability and their families automatically assume the required level of skills, knowledge, and capacity to behave as a customer once their plan is approved. This is a significant assumption, and while this may be the case for some participants, it is QDN's view that the majority of participants and their families are finding this very challenging. There is also the assumption that after one year, no additional support is

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<sup>1</sup> Department of Communities, Child Safety and Disability Services, 2017. The NDIS in Queensland rollout data and trends

needed to deliver and implement a plan with the withdrawal of supports coordination as a funded line item.

The NDIS is a major transformational shift for people with disabilities, families and service providers, and investment of time and resources is essential to ensure that all parts of the 'market' are able to behave appropriately within that context, and that everyone involved is well informed to understand this new environment.

Until the NDIS started to rollout in Queensland, the majority of people with disability in Queensland have had no experience of choice or control on how their supports are delivered, contracts, understanding implementation of funding to purchase supports, engagement with providers in an equal relationship, and service delivery has been based upon a block funded arrangement. The NDIS brings with it the opportunity for people with disability to be the driving force in their own lives and the transition to empowered, well informed consumers will take more time and investment to ensure people have the right skills, knowledge and capacity to operate in the NDIS market environment.

## **Participant Readiness to Navigate New Markets**

With the introduction of this new system and market people with disability are moving from being passive recipients of service to customers. For this fundamental shift to occur, people with disability require additional support, resources and information. For some people with disability this will be the first time in their lives that they will have choice and control over their service provision. To make this move to effective empowered consumer's people with disability need to be adequately resourced and informed on how to engage and navigate this new market.

Feedback from QDN members have been that without adequate resources and information people with disability are not going to be able to utilise the Scheme to its full potential and achieve their goals to increase social and economic participation.

As the Scheme is still rapidly rolling out in Queensland, the focus of the Local Area Coordinators (LAC) has been assisting the 90,000 people with disability in this State to access the Scheme and get an NDIS plan. Feedback QDN received has been that the LACs focus has not been on assisting people with plan activation including exploring the right supports and services to meet individual needs but rather just signing people up to the Scheme. Where support has been requested from a LAC, QDN members have reported that only thing that they have received is a print out of what services are available under a particular service type and then expected to just know what to do and how from that.

Queenslanders with disability have expressed that they believe effective support to develop skills and knowledge needs to occur through adequate supports coordination and knowledge/skill building sessions on plan activation and implementation to start to work towards individual goals. As more people in Queensland obtain approved NDIS plans, readily accessible information and support on activating plans will be

critical to the success of plan implementation for people with disability to achieve the goals and outcomes of the Scheme.

After the first year of the NDIS roll out in Queensland there has been slower than expected activation rates of approved plans. 73% of participants activated their plans within 90 days with 20% of all approved plans not being activated at all.<sup>2</sup> In light of these activation rates, QDN has received the following feedback from our members on why activation rates have been slower than expected.

QDN members have expressed that they have had experienced challenges with all components of the participant journey, from accessing the scheme, plan activation through to navigating the new market. People from the following groups have expressed that they are experiencing even more challenges navigating the new market due to their additional requirements:

- New participants and people who receive funding from other Government programs who need to provide medical documentation about their disability to access the Scheme. These people are finding it difficult to access General Practitioners and clinicians who have knowledge and understanding about how to complete the necessary paperwork that meets requirements for access;
- People with complex needs who need a range of specialists supports and who most likely will need additional support and assistance to actually make an access request to NDIS;
- People who identify as Culturally and Linguistically Diverse (CALD) have experienced challenges in accessing the right information in the rights format and having someone culturally aware to explain the NDIS;
- People with dual or psychosocial disabilities have identified that a significant barrier to participation in the marketplace is actually making an access request, and then the additional supports that people need to implement their plan, as their fluctuating needs and life circumstances impact at different times;
- People living in rural and remote areas have identified that they are finding it difficult to find information, services particularly allied health workers and supports coordination due to the lower levels of resources in these areas.

Feedback from QDN members have identified the following as why people have been delaying accessing the Scheme:

- People are holding back and frustrated as they were uncertain about how to activate their plan or lacked the skills required to activate their plans;
- People receiving State funded disability services were having difficulties understanding the information that has been provided to them about their transition to the NDIS. Some of these participants were not clear that they had to move to

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<sup>2</sup> Department of Communities, Child Safety and Disability Services, 2017. The NDIS in Queensland rollout data and trends

the NDIS and that it was not an option to stay with the State funded services. These people require more individualized support to understand the changes to the funding of disability supports with the introduction of the NDIS;

- People were unaware that saying “not now” to an access call may be taken as not consenting to be part of the Scheme;
- People expressed confusion around “new language and roles” including how the different roles fit into plan activation eg Supports Coordinator, Local Area Coordinator, Service Provider, Plan Manager;
- People are sitting back and waiting to see how the Scheme works for other people before putting in an access application;
- Some people with disability do not identify as having a disability;
- People found it challenging finding organisations able to deliver what they want – right time, place, people and skills.

The common theme in the feedback received from QDN members on why they have been delays in people accessing the Scheme and navigating the new market has been around the need for further information and resources. From feedback from Queenslanders with disability, key issues being raised include:

- people with disability need more time and individualized support to better understand how the Scheme works and how they can navigate the new market to meet, their individual needs.
- marginalized people with disability who are already experiencing disadvantage require more specialized delivery of information and capacity building to become empowered consumers in this new market.
- People who have been participants in preplanning and peer support groups have reported that they felt more comfortable with the planning process and accessing the Scheme. They felt this peer to peer support would be beneficial to assist them to understand and navigate this new market and would like these programs run through community organisations to continue to support them through the plan activation stage.

The late introduction of Local Area Coordinators particularly in remote areas has impacted on people with disability being able to easily access the Scheme. QDN members in these areas have expressed concerns about the limited assistance to access the Scheme in these areas particularly for Aboriginal and Torres Strait Islanders (ATSI). People with disability from ATSI backgrounds generally are transient and have lower levels of literacy making accessing the Scheme in conventional channels more challenging for this population. In these remote areas, accessing medical documentation or obtaining new assessment depends on when medical professionals are in town. This means collecting the necessary medical documentation to meet the NDIA timeframes can be challenging with some potential participants having to reapply, as they did not meet these time constraints. The lack of access to LACs or other assistance in the community to join the Scheme has led to

some people not being able to access the Scheme. Feedback has been received that people in these areas need more “hands on assistance” with understanding the application process, obtaining the right medical documentation and activating the plans in a thin market.

Our members in regional areas have also expressed that they require more support to activate plans and engage with service providers. This is particularly a challenge for people who have never received supports before and are trying to access support in an already thin market. People are having challenges in finding the right supports or programs, finding services with availability as well as understanding the services they are purchasing including their obligations under contractual arrangements.

Some people with disability have provided feedback that they did not understand how to engage a service provider so have opted to wait and see how others engaged staff. This lack of confidence in being able to utilize their plans and engage with service providers has delayed people with disability working towards their goals. It could also have implications when plans are reviewed as it could be seen that people do not require that level of funding rather than they did have the skill level to utilize the funding. As people with disability will now have more choice and control over what services and supports they can purchase, they will also require more support to be able to affectively engage in this new market.

QDN believes that there is still a great need for more participant readiness work to be undertaken throughout Queensland to help people with disability become empowered consumers. Potential and current participants are requiring assistance and more time to understand the Scheme and activate their plans. While supports coordination has a framework for what this service ‘should’ deliver, there is no consistency about how supports coordination is being translated on the ground. It is critical that supports coordination fulfills the need to better assist people with disability through practical and accessible information to understand how their plans works, what services are available in their local area and how they can navigate the new market. As more Queenslanders with disabilities have approved plans the focus is changing to the need for more information on how to purchase services, what consumer’s roles and responsibilities are under a contract, how they can purchase services as well as understanding their plans and how the funding can be utilities. With the right information and support people with disability are keen to engage with this new market to become empowered customers working towards their goals.

## **The Development of the Disability Workforce to Support the Emerging Market**

The development of the disability workforce to support the emerging market has been a keen issue for QDN members. With the Scheme rolling out throughout Queensland there are concerns about the workforce demand being able to meet the supply. As demand for support services rapidly doubles in Queensland by 2019, the supply of Queenslanders with Disability Network LTD

support staff including allied health professionals is not increasing at the same rate. The thin market is leading to people with disability continuing to not have the right supports, having to pay over the market price to secure staff or having funded packages they cannot utilise. The lack of available and qualified staff is impacting on people's choice and control particularly for younger participants who are seeking support staff who can help them learn new skills to achieve their goals around social and economic participation.

With the need for an increase in this workforce, investment in training and development for people with disability should be explored. The majority of people with disability with the right supports are keen to be a valuable members of the workforce. Up until the introduction of the Scheme, people with disability have been limited in what they could do in regards to employment due to their support needs. With this barrier being reduced people with disability with the right training could potentially reduce the stress on this quickly growing market where people have the skills and experience to deliver on market segments relevant to market demands.

In this new market, QDN members have expressed concerns that the pricing for support staff is too low leading to providers opting to leave the market, support staff particularly in remote areas not committing to long contracts and/or participants having to pay over the current market rate to secure the right staff in a thin market. With demand for support staff exceeding supply people with disability are not able to have choice and control over their support staff options as they are limited by the availability in this thin market.

Our members particularly in remote areas in the Gulf of Queensland have shared stories about the lack of new support services in this region. Feedback from QDN members in these areas is that people now have funded supports however; there is not the appropriate workforce available to meet the increased demand. This is particularly in areas in the Gulf of Queensland where there would need to be more investment into training to develop a workforce with particular focus on the needs of Aboriginal and Torres Strait Islander people with disability.

Our members in remote areas have expressed concerns around service providers from locations over 800km away coming into towns and signing up people with disabilities to their services. As there are no offices in town, people with disability are not sure about their rights as a consumer and what to do if these providers do not provide the agreed service. With very limited options in these areas for service provision they are also not in a position to be able to readily change from one service provider to another if they are unsatisfied with their current service provision. In these remote areas with limited service provision members are also concerned that if the current service provider finds this area financially unviable and stop providing services, people in this area will have no other service provision options. They are concerned that there are no contingencies in place in the remote areas if service provision ceases by one major provider.

In areas such as Mornington Island, members are reporting that there are no service providers currently providing supports in these areas. People with disability in these extremely remote areas have approved plans but have not been able to find suitable support staff through a service provider. This leads to people with disability in these areas having limited options on how they activate and utilise their plans.

Members in remote areas have reported that the support workers that have been engaged in these areas have not stayed. People with disability in these remote areas are concerned that the pricing for support workers may not be sufficient for support workers to continue want to work in these remote areas.

Similar feedback has been received from our members in North and Central Queensland expressing that there has not been an increase in the service providers available in these areas. People with disability are reporting that the same service providers are still offering the same services. Members in Central Queensland have expressed that this is not just for support workers but for home cleaning and yard maintenance services as well. Members have tried unsuccessful to engage non-disability specific private cleaning and yard maintenance services. When contacting these private domestic services they have informed them that they would be paying through their NDIS plans and these contractors have not go back to them with a quote.

In regional areas where the supply for support workers is low and demand has become high, QDN members have commented that they have been choosing to self-manage their packages to try to secure the best possible support staff in an under resourced market. Some members are paying over the allocated hourly rate, so they can secure the right staff who will stay as their support worker in this demand driven market. For people with disability who are generally on low incomes to be able to pay higher than the pricing guide to secure support staff they will either need to make budget cuts going without essential items or reduce the hours of support they use to meet the new price. These options will have a negative impact on people with disability and limit their ability to reach their goals.

QDN has also received feedback from our members that the service providers are still providing the same level of service. Some members have reported that they are not having the choice and control they would like so they can work towards their goals. Members have also expressed a view that they have not seen service providers engage with customers to redesign and redevelop their products to meet this new market. People with disability identify that they are still facing the same challenges trying to access the right staff, at the right time to meet their individual needs. New service designs have not been explored to meet the new model of individualised supports. This is leading to frustration by people with disability who are trying to be active consumer in a new market which isn't able to meet their developing needs.

QDN believes that there needs to be more work done to expand the workforce to support the increased demand for services particularly in regional and remote areas.

Queenslanders with Disability Network LTD

It is important that in their role as market steward, the NDIA undertakes targeted work that delivers improved market outcomes for people with disability to get the right supports at the right time. QDN believes there needs to be more development and promotion of suitability qualified support staff to meet the increasing demand. Innovative incentives should be explored to entice people to work in regional and remote areas as well as more development of a younger workforce to meet the needs of this cohort. By assisting, the further development of the disability support service market will potentially lead to having the right support staff assisting people with disability to achieve their goals. In this new market place providers of services need to start engaging people with disabilities as empowered consumers by promoting their services in a number of mediums including online so people with disability can start comparing the market to be able to choose the best option for them. This fundamental shift for both consumers and service providers is critical to an effective marketplace, and all parts of the market need to be able to operate well.

## **The Provision of Housing Options for People with Disability, with Particular Reference to the Impact of Specialist Disability Accommodation (SDA) Supports on the Disability Housing Market**

Housing is a fundamental need and human right and key to enabling people with disability to be included in community and family life, and to participate fully as citizens within Australian society. In QDN's 2017 Member survey, appropriate and affordable housing was one of the key issues identified by people with disability. QDN members would like access to housing that is accessible, affordable, secure, and inclusive and reflects individual choice. In the current housing market, there has been a decrease in housing affordability leading to less home ownership. With limited public housing, people with disability need to navigate the private rental market. People with disability who may need home modifications, negotiating these with property owners can be difficult and some property owners may choose other tenants without these additional requirements. These difficulties with securing appropriate housing options limits people with disabilities choice and control over where they live.

In relation to the provision of housing options for people with disability feedback from our members has been that overall there has not been much movement in increasing housing options. Feedback from our members in Central Queensland has been that there is very little development of specialist disability accommodation in regional areas.

As the Scheme continues to roll out throughout Queensland, QDN has been receiving feedback that service providers are looking at congregate care housing models to meet increases in demand. Our members are concerned that service providers are investing in developing more group homes so they can support up to four people in the one home with minimal staff. QDN members have expressed their concern that this may lead to congregate living arrangements being the only viable option, limiting

choice and control, and reverting to historical models that we have shifted away from. QDN's experience is that people in congregate care arrangements often have no real choice about where and with whom they live and research indicates people experience a higher than average risk of neglect, abuse and violence.

The current market of accommodation providers delivers traditional models of congregate care. The NDIS provides a great opportunity to drive innovative housing model responses that can shift the market and deliver options that give people with disability a range of choices about their living arrangements.

As identified, the lack of available accessible and affordable housing stock greatly impacts upon people with disability who want to move out of their congregate care arrangement. Without specific market interventions, this will mean that people cannot realise their NDIS goals and dreams of choice about where and with whom they live, and also achieve obligations as a signatory to the United Nations Convention on the Rights of People with Disabilities Article 19 - Living independently and being included in the community with particular reference to Article 19 (a) Persons with disabilities have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement.<sup>3</sup>

There appears to be a disparity between the assumptions about the ongoing provision of group homes and specialist congregate care settings by providers and the goals and aims of people with disability themselves.

QDN members have expressed concerns about the limited housing options for people with high support needs in remote areas. With the low levels of supply of accessible housing and support staff in these areas the options for people with disability with high support needs is to relocate to a location with the right infrastructure. The issue with people with disability having to relocate is they are then separated from their families, community and culture. This separation can limit their choice and control as their informal support can live up to 1000km away making regular visits timely and expensive. There is a need to find practical solutions so that people with high support needs can stay in their hometowns if this is their choice.

More information on QDN's position and 11 recommendations around accessible, affordable housing for people with disability is detailed in QDN's Going for Gold: Accessible, Affordable Housing Now paper available at <http://www.qdn.org.au/hot-issues/hot-issues-housing.aspx>

QDN believes there still needs to be more development to build the housing market of appropriate, accessible and affordable accommodation throughout Queensland. In relation to housing options for people with disability, QDN believes that there needs to

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<sup>3</sup> <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-19-living-independently-and-being-included-in-the-community.html>

be an increase in the supply of accessible, affordable housing with improved access to private rentals and social housing for people with disability. This is particularly important in rural and remote areas where supply is low.

QDN member have expressed that they would like more innovate solutions that lead to greater home ownership as well as a national approach to home modifications and assistive technology. QDN believes that there needs to be a priority pathway for people with disability who are in congregate care to be able to have other housing options if they would like to live outside this group-housing model.

## **The Impact of the Quality and Safeguarding Framework on the Development of the Market**

QDN acknowledges the importance of quality and safeguarding and of getting the right balance that will afford people the choice and control they need to live a good and ordinary life, alongside the measures and regulations to ensure the system is accountable and operates in a way that upholds the rights and well-being of the individual.

QDN has observed that there is a degree of rhetoric surrounding the Quality and Safeguarding Framework suggesting that once this framework is implemented, measures to safeguard all people with disability from abuse and neglect will be achieved. It is important to recognise that this is a complex issue, requiring a range of interventions, investments and multi-dimensional approaches to deliver on a safe and inclusive service system for people with disability that delivers quality supports and services. QDN believes it is important to acknowledge that similar quality system and abuse prevention and intervention frameworks have been in place in all jurisdictions and varying outcomes of quality and safeguards have been achieved.

QDN recognises that in the implementation of the “Framework”, the NDIS Quality and Safeguarding Commission will undertake a range of responsibilities and functions to enact these functions, along with responsibilities that will be retained by each state and territory government. While the implementation of the quality systems across Australia has varied, within Queensland’s administration of the Disability Sector Quality System and more recently the integration of this within a Human Services Quality Framework, there has been a recognition of the impacts of compliance on organisations, the application of appropriate sector development resources, and financial payments to organisations to assist them with the operating expenses of implementing and maintaining a quality system, external auditing costs, and human resources implications. There are many elements to implementing quality systems within organisations and businesses, and within the current pricing of the NDIS, there is little to address the cost of compliance that organisations will be required to undertake to implement quality systems. QDN believes this is and will have significant impact upon market viability and market sustainability, and ultimately affecting people with disability’s choice and control and options to purchase services.

The implementation of safeguards and measures to ensure people with disability experience better outcomes in relation to prevention, reporting, and responding to abuse, violence and neglect is also multi-dimensional and requires appropriate investment of resources directed towards people with disability around education and rights, as well as targeted training for staff. QDN acknowledges that the “Commission” and framework will require all staff to undertake orientation training focused on a worker code of conduct, however, QDN believes that further training and education for the workforce will be essential to achieving safeguards and reducing abuse, violence and neglect of people with disability. Regardless of the efficacy of internal organisational systems that are in place to report and respond to abuse, without a well-skilled and informed workforce who can identify indicators that identify that individuals with disability may be experiencing abuse, violence and neglect any system will be ineffective.

People with disability, in particular people with intellectual and cognitive disability experience abuse, neglect and violence at four times the rate of the general population. Dick Sobsey’s research suggests that 48% of offenders of abuse towards people with intellectual disability have accessed the victim through a disability service provider who is in place because of their disability and need for support, ie support workers, carers, transport providers.<sup>4</sup>

It is therefore essential that appropriate measures are in place, and that organisations and sole traders are adequately resourced to implement these measures within the pricing structure of the NDIS.

## **Provider of Last Resort Arrangements, including for Crisis Accommodation**

As the NDIS rolls out and Queensland transitions to the national service system, there are emerging gaps and areas where people with disability, particularly those with complex needs will need measures in place to ensure they have access to emergency accommodation and services where the market fails to be able to deliver what they need. As identified earlier in this submission, regional, rural and remote areas are already identifying the impacts of thin markets and where services are not able to meet demand.

The loss of a range of specialist disability services during transition, and the impacts of the ‘cashing out’ of a range of essential services that have often provided a safety net for some of the most vulnerable and marginalised individuals are starting to emerge. There is an acknowledged risk of market failure as NDIS registered providers make business decisions based upon financial viability. This action may leave people with disability who have more complex support needs and higher cost services without

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<sup>4</sup> Sobsey, Dick, 1994. Violence and Abuse in the Lives of People with disability. The End of Silent Acceptance? Queenslanders with Disability Network LTD

access to service and supports as these costs may not currently be built adequately into the current pricing structure.

The Queensland Operational Plan between the NDIA, Queensland Government and Commonwealth Government for the transition to the NDIS (20 July 2016) identifies that the NDIA will lead on identifying and developing approaches to ensure that a provider of last resort is available, as well as support for participants in crisis.

It is critical that a clear pathway is developed with responsibilities for state and commonwealth jurisdictions to ensure all people with disability have access to essential disability services and do not remain 'stuck' in mainstream service systems such as health, criminal justice and child safety without viable more appropriate community based options.

In the Queensland context, QDN believes it is important that the approach to provider of last resort is built and framed within a contemporary disability approach, and reflective of the findings and recommendations of Justice Bill Carter's Report in 2006. QDN acknowledges that often mainstream services especially in rural and remote communities may be the only service provided in some communities. However, QDN believes it is critical that the market intervention strategies which are put in place ensure that basic principles of non-institutionalised, community based, individualised settings are the basis of the service response to people with disability who need the safety net of provider of last resort.

## Conclusion

QDN is committed to working with the NDIA, the Queensland Government and the Commonwealth Government around these important issues to ensure that the NDIS delivers on what has been promised to people with disability, their families and carers, providers and the broader community. QDN welcomes the opportunity to provide further comment and help develop these key areas further.

As the Scheme continues to roll out through Queensland and more people with disabilities become NDIS participants the need for informed and market ready consumer's increases. With the focus to date being on accessing the Scheme, QDN believes there is still further skill development to occur for people with disability to be empowered consumers. Feedback QDN has received is that people with disability would like further assistance in how to activate their plans and how to navigate this new market including sourcing and purchasing the right supports so people can reach their goals. QDN is committed to helping people with disability to become ready for the Scheme, assist people to activate their plans and support people with disability to achieve their goals to have a good life.

QDN believes there needs to be more development of the disability workforce particularly in regional and remote areas. The increase in demand for support services has not been matched with an increase in supply. This inequality between demand and supply is impacting on people with disability being able to have the right supports,

at the right time. The NDIS as the market steward needs to step in to regulate this thin market particularly to ensure services remain viable in remote areas.

Appropriate, accessible and affordable housing continues to be a major concern for people with disability. In relation to housing options for people with disability, QDN believes that there needs to be an increase in the supply of accessible, affordable housing particularly in rural and remote areas where supply is low. QDN believes there needs to be further development of the housing market particularly looking at innovative ways that can assist people with disability to be home owners or to access affordable private and social housing options.

QDN strongly supports a robust quality and safeguarding system which protects and upholds the rights of people with disability. QDN believes that it is important that all parts of the service system, including people with disability are adequately supported with the information, education, training and supports to be able to identify, report, and respond to abuse, violence and neglect as well as implementing a nationally consistent quality system which delivers accountability and outcomes.

People with disability should not be left in a more vulnerable and disadvantaged position with the introduction of the NDIS and the operationalisation of safeguards for provider of last resort, crisis accommodation and what will happen where 'thin markets' exist is critical.

There are many Queenslanders with disability who are experiencing the positive impacts of the NDIS and what it means in their day to day life, however there are also many people who are experiencing disadvantage in operating as a customer within the new market. QDN looks forward to continuing to work with all key stakeholders to ensure the 90,000 Queenslanders with disability eligible for the Scheme can access it and maximise the opportunities it brings to achieve social and economic participation in their communities.