

## Submission – Home and Living under the NDIS



Submitted to the National Disability Insurance Scheme Review

August 2023

# Introduction

This submission is informed by a forum hosted in partnership between QDN and QShelter in April 2023, which was attended by over 50 Community Housing Providers, Office of the Public Advocate, disability Peak body representatives, and people with lived experience of the NDIS and disability.

QShelter has provided the NDIS review with an independent submission, QDN supports the recommendations and evidence outlined in QShelters submission.

QDN has also done extensive engagement with members in relation to all elements of the NDIS review, through targeted forums and engagement through our Peer support groups and leadership forums.

QDN welcomes the opportunity to make a submission to the NDIS Review to provide recommendations in relation to home and living support funded through the NDIS. QDN's work around home and living for people with disability is underpinned by our Housing Vision and four Housing Principles.

**Housing Vision** - *QDN believes people with disability have the same right as other citizens to have housing options and choices available to them that are inclusive, accessible, safe and affordable.*

**Housing Principles** – *Rights, Choice, Inclusion and Control.*

The Housing Vision and Principles have emerged through QDN's long history of taking leadership on Housing issues, as the number one issue identified by members. In 2016, QDN partnered with National Shelter and Griffith University to publish an issues paper, [A Place to Call Home](#). This issues paper formed the basis for engagement with people with disability, and resulted in QDN Position paper on housing for people with disability "[Going for Gold: Accessible, Affordable Housing Now](#)".

The principles are based on international human rights conventions and treaties to which Australia is a signatory, Australia's Disability Strategy and the core National Disability Insurance Scheme principles of choice, control and economic and social participation. They cover rights, choice, inclusion and control and were co-designed with our members and housing champions. These principles have subsequently been adopted by the [Queensland government Department of Housing](#). More detail is provided on the principles at [Attachment 1](#).

Housing is a fundamental need and human right, and key to ensuring people with disability are included in community and family life, and able to participate fully as citizens. QDN highlights Article 19 of the [Convention on the Rights of Persons with Disabilities \(CRPD\)](#) which seeks to promote and protect the equal rights of all persons with disability to live in and be included in community, and welcomes the Australian government commitment to upholding it. The article states:

*(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;*

*(b) Persons with disabilities have access to a range of in-home, residential and other community support services, including personal assistance necessary to support living and inclusion in the community, and to prevent isolation or segregation from the community;*

*(c) Community services and facilities for the general population are available on an equal basis to persons with disabilities and are responsive to their needs*

In the context of living arrangements, the choice of where to live and who to live with is often not the individual choice of people with disability but more often that of family members, guardians, NDIS nominees, NDIS planners, service providers, and policy makers.

For people with disability to be able to make meaningful choices in their lives, including where and with whom to live, and for the free development of the person, in addition to Article 19 Australia needs to meet its obligations under Article 12 of the CRPD and replace substitute decision-making with supported decision-making which respects the rights, will and preferences of people with disability.<sup>1</sup>

In line with the principles, QDN has a strong position that there needs to be **a clear separation of housing and the provision of supports** for people with disability. Housing should be primarily a person's home, not someone's workplace, and people should be able to change their housing without affecting their support arrangements and change their service provider without affecting their housing.

While the NDIS provides a range of tailored home and living supports designed to assist people with disability to be included in communities, in the current housing crisis facing Australia, people with disability are even more disadvantaged. Beyond reform and improvements made to the scheme itself, there needs to be better understanding and integration with state government and mainstream service systems, in line with the Applied Principles and Tables of Support (APTOS), to ensure people with disability are not at increased risk of homelessness, moved into inappropriate housing such as aged care facilities, health/hospital systems or at risk of increased contact with the Child Safety and justice systems.

## Housing context

### Public/social/community housing, private rental and home ownership

Australia is currently facing a housing crisis with limited access to affordable housing for people who would usually be able to access private rentals or own their own home. There is a shortage of affordable, sustainable housing in both the private and social housing sectors. This crisis is amplified for people with disability in Queensland who are struggling to find accessible, affordable and sustainable housing, or any housing at all. The continued increases in the cost of living and inflation, with no increases in income support (Disability Support Pension, DSP) are compounding this issue. The limited (or zero) vacancy rates have removed any notion of choice and control for people with disability across private rentals, community and public housing. People with disability have limited choice in housing options, with the lack of affordability and often accessibility of traditional housing options such as private rental housing and home ownership, as well as difficulty accessing Department of Housing and

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<sup>1</sup> United Nations (2006). *Committee on the Rights of Persons with Disabilities*. [Convention on the Rights of Persons with Disabilities | OHCHR](#)

Community Housing options due to long waitlists, lack of accessible housing options and/or lack of vacancies.<sup>23</sup>

QCOSS' 2022 Living Affordability in Queensland report found that due to high inflation, low-income households are spending most of their income on basic goods and services, such as food, housing and energy, and that all modelled households included in the report are spending more than 30% of their income on housing and are considered to be in housing stress.<sup>4</sup> It also makes note that people with disability are more likely to struggle to make ends meet based on the data.

An Anglicare study found that only 1.9% of properties (57) in Brisbane were affordable for the people surveyed and appropriate for households on income support and only 10.4% of properties (316) were affordable and appropriate for those on minimum wage.<sup>5</sup>

People with disability are more likely to be found in inner regional areas (22%) rather than the major cities (17%). Indigenous Australians experience disability at around 2.2 times the rate of non-Indigenous Australians<sup>6</sup>

There are often other barriers to navigate, including the inability to afford modified housing, assumptions about the need for institutional and congregate care, and difficulty negotiating and advocating within the housing system, particularly for those with complex needs, including people with intellectual and cognitive disabilities. The statistics below illustrate the financial barriers for people with disability to sustain private rental, social and community housing.

- Currently in Australia there is a shortage of affordable, sustainable housing in both the private and social housing sectors.<sup>7</sup> 16% of people with disability who rent, do so from a state or territory housing authority compared to 4% of people without disability.<sup>8</sup>
- 39% of social housing households have at least one person with disability.<sup>9</sup>
- In 2020-21, 8.6% of all Specialist Homelessness Services clients were clients with disability, 30% of these have severe or profound disability.<sup>10</sup>

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<sup>2</sup> Queensland Council of Social Service (2018). QCOSS Position on Housing. [Long report template with cover page \(qcross.org.au\)](https://qcross.org.au)

<sup>3</sup> Goodwin, I., Davis, E., Winkler, D., Douglas, J., Wellecke, C., D'Cruz, K., ... & Liddicoat, S. (2022). Making homes more accessible for people with mobility impairment: A lived experience perspective. *Australian Journal of Social Issues*, 57(4), 956-969.

<sup>4</sup> QCOSS (2022). *Living affordability in Queensland*. [Living-Affordability-in-Queensland-2022\\_FINAL.pdf \(qcross.org.au\)](https://qcross.org.au)

<sup>5</sup> Wood, L., (2022). Rental Affordability Snapshot. *Anglicare Southern Queensland*. [2022 Rental-Affordability-Snapshot final V1.1.pdf \(anglicaresq.org.au\)](https://anglicaresq.org.au)

<sup>6</sup> Queenslanders with Disability Network (2017). Going for Gold. [QDN-Going-for-gold-position-paper.pdf](https://qdn.org.au)

<sup>7</sup> Clarke, A., Cheshire, L., Parsell, C., & Morris, A. (2022). Reified scarcity & the problem space of 'need': unpacking Australian social housing policy. *Housing Studies*, 1-19.

<sup>8</sup> Australian Institute of Health and Welfare (2022) [People with disability in Australia](https://aihw.gov.au), AIHW, Australian Government, accessed 07 March 2023.

<sup>9</sup> Australian Institute of Health and Welfare (2022) [People with disability in Australia](https://aihw.gov.au), AIHW, Australian Government, accessed 28 March 2023.

<sup>10</sup> Australian Institute of Health and Welfare (2022b) [People with disability in Australia](https://aihw.gov.au), AIHW, Australian Government, accessed 29 September 2022.

- Of the total 400,000 Australian social housing households, people with disability make up 41% of public housing; 33% of state owned and managed indigenous housing (SOMIH) and 36% of community housing.<sup>11</sup>
- People with profound core activity limitations were more likely to report living rent free (18%) or being a boarder (12%), which is twice the incidence of these tenure arrangements reported by other groups.<sup>12</sup>

Social housing stock is failing to keep up with the pace of population and affordable rental housing provision is also falling, particularly with the expiry of the National Rental Affordability Scheme (NRAS)

There are further barriers to affordable and accessible housing for people with disability who identify as Aboriginal and/or Torres Strait Islander, Culturally and Linguistically Diverse, LGBTQIA+ and/or people on low incomes due to further experiences of discrimination and marginalisation.

### NDIS Home and Living supports

The barriers to traditional forms of housing mean that often the only other option is NDIS home and living accommodation. Many Specialist Disability Accommodation (SDA) homes are sitting vacant because of the wait times on approval of SDA for participants and the lack of locations where SDA stock is available, many participants are not eligible for either SDA or Individualised Living Options (ILOs) and the only option for people with disability who can't get into mainstream forms of housing, SDA housing or utilise ILOs are only able to access Supported Independent Living (SIL) accommodation, and these types of communal living arrangements don't suit everybody and do not always operate in ethical ways.<sup>13</sup>

There is a general lack of knowledge around housing supports in the Disability housing sector which needs addressing. The focus of home and living supports should centre around participants' needs and providing appropriate forms of housing based on such needs, with a focus on vulnerable groups including those who are in legacy group homes.

Elements of the pre-NDIS model of care and support are being carried over within NDIS institutions, with only some adapting to fit NDIS models of care and support. There are plans for the NDIA to conclude payment to providers for old legacy housing. In 2021, the payments ceased for SDA accommodation with 11 or more residents and in 2026 it will cease for SDA properties for 6 or more residents, which will leave the stock potentially abandoned after the phasing out of NDIA ownership.

The Queensland Government need a better plan to transition people with disability out of SILs legacy accommodation.

### Residential Services - Level 3 Supported Accommodation

Residential services include private hostels and boarding houses that provide a range of housing for vulnerable people with varying levels of support. This sector has become a vital link in the prevention of primary homelessness due to the increasing gaps in the housing market, however, the legislation related

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<sup>11</sup> Queenslanders with Disability Network (2017) Going for Gold. [QDN-Going-for-gold-position-paper.pdf](#)

<sup>12</sup> Queenslanders with Disability Network (2017) Going for Gold. [QDN-Going-for-gold-position-paper.pdf](#)

<sup>13</sup> Disability Royal Commission (2020). Report of Public hearing 3: The experience of living in a group home for people with disability. [Report - Public hearing 3 - Group homes \(royalcommission.gov.au\)](#)

to this sector is over 20 years old and requires urgent revision and reform to ensure it meets contemporary community standards and safeguards.

Residential services have become the 'end of the road' for many people exiting from institutions, because of a lack of early planning for housing, resulting in them being 'forgotten' or cycling back through the system again.

There is a lack of accurate data on the numbers of people with disability living in residential services and their pathway to entering this setting, for example through choice or a last resort. It was acknowledged that people with disability are often referred to residential services by hospitals, emergency services, youth justice, corrective services or due to homelessness. Further, there is a need to better understand a person's confidence in engaging with available safeguards and complaints mechanisms and to identify the gaps in oversight mechanisms.

It is critical that this data and information is available to increase safeguards for people with disability and inform more contemporary legislation to ensure that people living in residential services are safe and supported to activate choice and control in relation to long-term, sustainable and affordable housing that meets their needs. A key part of this understanding is ensuring that those eligible for the NDIS have access, and that those who are not eligible have access to the supports they need.

*"For seven years I've been one of more than a dozen residents living at a formerly block-funded facility that has a mix of single- and two-bedroom apartments, a shared dining room where meals are served 3-times per day from a central kitchen (2x choices at lunch and dinner) and a laundry service. My apartment has two bedrooms and a share bathroom in-between. I call it a 'facility' because that is how it is referred to over and over in the contract: as in, you are responsible to be courteous to the other residents at the facility. I've been there with two other women over that time, but I was not consulted before living with my co-residents. Both have now passed on and the room that was theirs is now off-limits - to me. I prefer the privacy now I'm the only occupant in my unit. The additional staff interaction and the associated lack of privacy is the most difficult thing to endure. The property owner and the service provider are the same entity. This is never an ideal situation. My accommodation agreement is separate to my support agreement, but the two are linked by clauses such as the one that prohibits residents from purchasing supports (other than Community Access) from any other provider. I feel disinclined to move because everything must change if I do - even when the provider increased my rent by just over 44% because that was the amount on the NDIS Price Guide, with very little notice and no consultation." (QDN member)*

## Recommendations

Integration across State and Australian government agencies and the NDIS.

***Improved integration of NDIS and mainstream housing services as set out in the Applied Principles and Tables of Support (APTOS), and a review of how roles of all agencies are coordinating support and responsibility and addressing housing needs early, particularly for those people exiting government institutions.***

While the housing crisis currently being experienced is not the responsibility of the NDIS, outside of the scope of funded supports, there is a leadership role for the NDIS in ensuring that people with disability

are not at greater risk of homelessness, exploitation and abuse. The reality is that only a small percentage of NDIS participants will live in SILs or SDA housing, and many people rely on the private rental market, with social housing wait lists years long. There needs to be better coordination and funding of the integration of supports between all levels of government and the NDIS so that people with disability can access and navigate the supports available to live independently or in a house/home of their choosing.

It is clear that there are significant gaps in services and support for people with disability ineligible for the NDIS. However, there is also a **clear need for a revision of the APTOS in practice**, particularly in housing, as agencies continue to silo programs and services, have a continuing lack of capacity, resourcing and high staff turnover, resulting in government agencies also relying on the NDIS as the “oasis in the desert”. While the Disability Reform Ministerial Council (DRMC) has a key role in ensuring shared responsibility for delivery of the NDIS across states, this is clearly not filtering down to practice at a service level.

**Key points of tension in the system** are for people with disability from vulnerable cohorts including those: exiting government institutions, including health facilities; residential aged care and aged under 65 years old; corrective services and youth justice facilities; child safety systems and voluntary out of home care; residential services (privately owned hostels and boarding houses); those residing in legacy group homes and crisis and short-term homeless accommodation or sleeping rough.

For a significant number of people with disability living in these environments, they have a range of support needs and experience challenges navigating across complex systems and have often been labelled as complex people instead of acknowledging the complexity of the systems they are interacting with. State functions need to assist people with broader systems navigation, with disability-specific housing services dedicated to providing face-to-face, phone and online support to people with disability, around all housing options, both within and outside of the NDIS. NDIS partners in the community need to be skilled, proactive, and experienced to walk alongside people with disability in navigating this system.

## Increased leadership of the NDIA and increased investment towards the gaps in Home and living Supports

***The NDIA to play a stronger leadership role in highlighting gaps in home and living supports through its significant data cache to highlight evidence, need and strategic investment.***

The NDIA need to speak with a stronger voice about what is needed to influence a changed conversation in relation to strategic investment and community narrative to deliver for NDIS participants, and people with disability who are not eligible for the NDIS. The NDIS is well placed to provide strategic leadership, along with the Australian government, to deliver better home and living outcomes for people with disability which require a whole of government, whole of community approach.

## Increased safeguards and accountability measures for Level 3 Supported Accommodation

***The NDIS to work in partnership with the Queensland Government to ensure that there is separation of accommodation and supports in Level 3 Supported Accommodation and enforce regulation, independent auditing, and monitoring of the private companies/investors running these services.***

Research and findings, including through the Royal Commission into the Violence, Abuse and Neglect of People with Disability (DRC) identify that people living in residential services are at higher risk of violence, abuse, neglect and exploitation. As privately run accommodation, there are different types of gatekeeping practices occurring across these service systems that prevent people from accessing appropriate supports, exercising their choice and control over their living arrangements and engaging with the community.

It is also acknowledged that this risk is further compounded by instances where tenancy/housing and the disability supports are provided by the same provider/owner/service. There are additional complexities that exist when the landlord is also the NDIS provider, and the pathways for people to access safeguards and access to supports to navigate challenging situations, complaints and advocacy. Clearer separation of tenancy and NDIS-funded supports is important so that people with disability can have information and understanding about tenancy accountability, rights and what it means when services have dual responsibilities.

### Mechanisms for regional communities of shared learning and practice

***Create formal mechanisms, with a key coordination role to share information, increase understanding of roles, and collaborative practice between NDIS/NDIA staff, State government agency staff and Specialised housing and homelessness services responsible for housing programs to shift responsibility from individuals with disability to navigate complex systems.***

The NDIA has the opportunity to play a leadership role in working collaboratively across systems and mainstream services and agencies for people with disability, both those who are participants in the scheme and those who are ineligible. A regional mechanism for sharing of information, changing vacancies, programs and support mechanisms would ensure greater collaboration and integration of supports for people at a local level.

This would provide greater clarity for all stakeholders in ensuring that APTOS is activated in practice in a reflective and responsive way, and that barriers and issues were identified earlier. It would provide consistency and clarity of information, and also provide a mechanism for change through filtering service gaps, market failure through to policy and program elements of each agency.

This could also be a mechanism to pilot innovative practice and models that meets local needs and connect to ILC investment in local capacity building and peer supports.

### Co-design and person centred approaches

***Create smoother pathways and reduce barriers to support, including key performance indicators and measures for staff in relation to understanding and delivering person centred support.***

QDN members continually highlight the importance of co-designed processes throughout the development of new, and the review of existing programs, procedures and policies. Increasing the opportunities for co-design with a diversity of stakeholders and a diversity of people with disability results in greater collaboration, service integration and better outcomes for people with disability.

***Funded training for NDIS staff in disability-informed, trauma-informed, and person-centred practice. Consider training designed and delivered by people with disability.***



The skills and knowledge of staff delivering services to people with disability, particularly those with complex and intersecting needs has been highlighted as a key issue, and results in re-traumatising people, disengagement from the systems designed to support people. Staff need core training in the social model of disability, and an understanding of how to work from a person-centred practice, which includes people with disability, not making decisions on their behalf, and/or supported decision-making processes. There needs to be consistent home and living/housing-specific training for support coordinators and specialised support coordinators who play a significant role in guiding and helping people secure housing.

### Increased access to clear and accessible information about home and living options for participants.

***Home and living options be included early, as part of all planning conversations with participants, not just at particular life stages or transition points; with clear, accessible information on the options available in a supportive way that includes the person with disability and aligns with their goals (person-centred).***

QDN members report that information and support in relation to home and living supports and options are complex and difficult to navigate. NDIS staff have a key role to play, in partnership with State government agencies, to provide a more holistic approach in linking and informing people with disability about housing options available to them, in accessible ways, earlier in their participant journey.

There needs to be **more access to clear and transparent information about housing options and models and detail about what they offer**, what they look like and a variety of examples of people's experiences of living in each form of NDIS accommodation. This could be in the form of **an information kit** for people with disability navigating these services that outlines their options.

There are high numbers of people with disability who are living in legacy SIL arrangements that have not had home and living reviews as part of their plan reviews. This needs to be addressed with systemic scheduling of reviews.

Resources need to be **available in a range of accessible formats** such as digital and printed resources, Easy Read versions, audiovisuals, audio recordings for information/articles/any text documents, Auslan videos, 'Say Less, Show More' formats for all media files, braille for text and written documents as well as more video and visual formats.

### Expansion of the NDIS website, along with readily accessible and available information on alternative options and models of support.

***Update and expand the NDIS website with accessible information on alternative options and models of support for participants in relation to home and living.***

In 2018, QDN collaborated on a project with Brisbane based advocacy organisation Speaking Up for You on developing a user-friendly resource to **inform people what they should look for and expect from a quality SIL arrangement and their rights in relation to SIL**. QDN believes that **more work is needed in this area to ensure people can make informed decisions** and SIL information available on the NDIS

website requires significant expansion, along with readily accessible and available information on alternative options and models of support such as ILOs.

## Specialised Access, Planning and Support Coordination

***Specialised support available for access, planning and support coordination for home and living assessments for those with complex needs, including psychosocial disability.***

For people with disability from the vulnerable cohorts (stated above), **access to the NDIS** is still a key issue and needs to be supported through targeted outreach programs, and specialised approaches to support those who are eligible (as outlined in QDN submission around Access to the NDIS). Beyond access, **this cohort needs ongoing specialised support through the planning, and plan implementation process, including home and living conversations** in the initial processes, so that people can transition into secure, accessible and appropriate housing, with independent support. Access to independent support is essential to that participants can genuinely explore alternative home and living options. Given the long timeframes for housing to actualise, people with disability are being exited into unsuitable accommodation, remaining in health systems, or at risk of homelessness or contact with the justice system.

**Specialised support coordination should be included in participant plans** to allow planning for the future, potentially working towards different accommodation and support models. Having a **specialised team for psychosocial disability** is necessary to support people with psychosocial disability in the home and living space as well as involving people with psychosocial disability in co-design processes. The NDIA to fund independent support and capacity building opportunities so participants can genuinely explore all housing and support options and navigate NDIS processes.

## Prioritise participants in inappropriate housing.

***The NDIA should facilitate the development of innovative models of shared support and increase the amount of minimum support hours for level 3 specialist support co-ordination for those with Home and Living goals and complex support needs.***

Greater adoption of shared models of support, including onsite shared support (OSS), which enable a combination of 1:1 and shared support, greater flexibility for participants and better value from NDIS funding should be considered and implemented more broadly. The NDIA should ensure participants who share supports have the funding to access the supports they individually and collectively need.

For participants with Home and Living goals and complex support needs, having at least 40 hours of level 3 specialist support coordination funding included in each plan will ensure participants can work with an independent transition navigator to better explore and secure Home and Living supports.

## Increased Safeguarding

***Mandate the separation of housing from other NDIS supports as a condition of NDIS provider registration to end the conflict of interest that is occurring. Develop a framework and strategy to ensure separation happens, with clear timeframes for compliance. This must be accompanied by clear***

***information in relation to conflict of interest and best practice guidelines demonstrating the reasons why housing and supports need to be separated.***

It is QDN's position that there needs to be a separation of housing and supports, this means no organisation should be engaged in the provision of housing and/or tenancy management while also providing core or capacity building supports to the same individual. There is a clear conflict of interest in this and has been raised in an ongoing way throughout the NDIS implementation. This needs to apply across all housing tenures including SDA, SILs, private rental arrangements, boarding houses and supported accommodation and community housing providers.

QDN suggests **easier access for people with disability to independent advocacy** and **more regular safety and wellbeing check-ins** on people with disability in group accommodation. There needs to be processes/procedures to check-in on the wellbeing and safety of people with disability in public and community housing, and in other accommodation to ensure that their supports are still in place.

<p><i>'The (SIL) quote is owned by the house and is managed between the provider and the NDIA. I don't believe people have choice and control as it gives service providers too much power.'</i> <span style="float: right;">QDN member</span></p>
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## Greater Transparency and Accountability

***Independent auditing and monitoring of service agreement responsibilities to ensure increased accountability of NDIS staff in delivering supports to participants through home and living services.***

QDN supports **more fairness and equity in terms of plan resourcing**, and the NDIA taking on the role of ensuring that what is being claimed for funded supports is being provided. QDN members have highlighted the **importance of increased transparency from staff working for NDIS Home and living services**, such as explaining service agreements to participants in ways that are understandable and accessible to individuals. Accountability for upholding responsibilities outlined in service agreements should be maintained by consistent and regular monitoring as part of plan review processes, so that there is shared responsibility in the implementation of plans.

Participants need to have access to clear and consistent information about what is being charged via billing and or reporting.

## Specialist Disability Accommodation (SDA)

***Prioritise decisions and fast track applications in relation to SDA funding for participants stuck in inappropriate settings such as hospitals, aged care facilities, and SIL homes.***

Approval times for participants exiting hospitals and other inappropriate settings are extremely long, often resulting in missed opportunities to exit into long term housing, and deteriorating health and mental health. The NDIS needs to prioritise participants in inappropriate settings and set timeframes to reduce the numbers waiting currently for decisions, and a ten day turn around for applications. QDN supports the Summer Foundation policy position in relation to this issue.

There are currently multiple SDA properties sitting vacant for a range of reasons, yet more people sitting waiting for approval, or for SDA housing in an area that meets their needs. The market has failed to

deliver in relation to SDA and needs intervention by the NDIA to function as it was intended as the market has built SDA to maximise profit, without adequately understanding need and demand. The NDIA's Finder webpage indicates over 600 vacancies in SDA nationally, however, the \*Housing Hub and Nest properties listing sites indicate over 1000 vacancies in SDA nationally, despite 4,746 participants with SDA funding in their plans seeking SDA homes.<sup>14</sup> 2088 of these participants are not currently living in SDA, with a substantial proportion of participants having identified the SDA property they wish to live in, but awaiting funding decisions around the support that will enable them to move in to the accommodation. This points to funding and administrative issues with the NDIS rather than a lack of demand.<sup>15</sup> Many participants eligible for SDA aren't being funded at the level they require. For example, participants with more complex needs receiving Improved Liveability plans when they need to be Robust. There needs to be more funding for participants to match the level of support they require in and alongside their accommodation.<sup>16</sup>

***The NDIA needs to be more proactive as a market steward in relation to SDA housing supply, and create data systems that track and facilitate investment decisions in relation to SDA stock that matches participant needs.***

To ensure participants can access SDA that meets their needs, there must be an adequate supply of the right kinds of SDA in the right locations. For SDA providers to make informed decisions about the SDA they will build, they need to understand the local demand for SDA as well as the existing and pipeline of supply. The NDIA has a key role in this, and in better communication and consultation processes between property developers and NDIS participants, so that housing is set up to meet individual needs from the beginning, not just constructed in the format that will generate the most profit, with more than one participant.

SDA approvals for individuals requiring specialised housing need to accommodate participants with families. It is a violation of choice, control and is discriminatory to not allow participants that have partners and/or children to be housed together. Allowing participants to be involved early in development conversations means that properties can be built in areas where people have family, informal supports and are connected to community.

SDA payments need to keep pace with increases in house and land prices and be indexed in some way.

AAT decisions need to be embedded in the NDIA guidelines for reasonable and necessary decision making.

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<sup>14</sup> Wellecke, C., Robertson, J., Mulherin, P., Winkler, D., Rathbone, A., & Aimers, N. (2022). Specialist Disability Accommodation provider experience survey: June 2022. Housing Hub and Summer Foundation. <https://www.housinghub.org.au/resources/article/sda-provider-experience-survey-2022>

<sup>15</sup> Wellecke, C., Robertson, J., Mulherin, P., Winkler, D., Rathbone, A., & Aimers, N. (2022). Specialist Disability Accommodation provider experience survey: June 2022. Housing Hub and Summer Foundation. <https://www.housinghub.org.au/resources/article/sda-provider-experience-survey-2022>

<sup>16</sup> Wellecke, C., Robertson, J., Mulherin, P., Winkler, D., Rathbone, A., & Aimers, N. (2022). Specialist Disability Accommodation provider experience survey: June 2022. Housing Hub and Summer Foundation. <https://www.housinghub.org.au/resources/article/sda-provider-experience-survey-2022>

## Complex Support Needs and Supported Decision Making

***It is critical that the NDIA's new proposed home and living policy interacts with participants who have complex support needs and aligns with the NDIS Support for Decision Making Policy, so that people who require support in decision making can make meaningful decisions about their housing choices.***

We recommend the NDIS home and living policy aligns with formal decision support under the NDIS Support for Decision Making policy. **Supported decision making and housing options are inextricably linked.** A person with disability cannot meaningfully choose who they live with, where they live or who supports them at home without appropriate decision support. Choosing different living options is even more difficult for people with intellectual disability who frequently have historically had very limited housing options.

*'I know a family who has worked really hard to support their son to get SIL but there seems to be a reluctance on behalf of services to take on the 'complex clients' in favour of people with lower needs. How do we make it work so people with high and complex needs are always taken care of?' QDN member*

***The provision of independent decision supporters, best placed in independent advocacy organisations and state based disabled person organisations, be made available to participants making decisions about home and living under the NDIS home and living policy. We recommend independent decision support be block-funded.***

Supported decision making needs to be free from conflicts of interest being delivered by service providers delivering services who could interfere.

QDN **endorses** the **recommendations** for supported decision-making in the home and living context for people with intellectual disability made in the **NDIS publication "Having a go: Exploring the use of supports to make individualised living a reality."** The NDIS Supported Decision Making Implementation Plan **needs to include co-design with people with disability in the development of the Operational framework** and associated resources for people with disability, families, carers, supporters and staff across the NDIA and NDIS workforce. This co-design process needs to include people with disability and their families from First Nations communities and families, and people from culturally and linguistically diverse backgrounds and other diverse groups to ensure the framework reflect different cultural contexts and relationships.

### Exploration and design funding

***Develops safeguards for participants who want to try new living options and that the NDIA provides clear guidance for NDIS staff and service providers to enable dignity of risk and support decision making.***

Exploration and design funding is an avenue to give NDIS participants **the opportunity to try out different living options.** This is particularly important for people with disability who have never had the opportunity to experience something different other than living in institutions, or group homes. **In order to make an informed decision, people need to be supported to try an option first.** In the current housing environment, particularly for people with intellectual disability and complex needs, this is not supported.

## Informed Decision Making and empowerment of people with disability in SIL homes.

***Invest in increasing the knowledge and understanding of people with disability who are funded in SIL arrangements, along with supported decision making, so that participants are able to make informed choices.***

People with disability along with their families and supporters need to be able to make informed choices about SIL and have the option to connect with compatible others who are seeking a housemate, and alternative living arrangements across a wide range of housing options. As mentioned previously, there needs to be a systemic scheduling of home and living reviews of the plans of participants in legacy accommodation.

## Home modifications

***Streamline assessment and approval processes for home modifications, including for rental properties.***

Members have consistently reported struggles with lengthy wait times, overpriced quotes on housing modifications as well as modifications not being approved to stay where they are, which again, leads to a lack of choice and control in their living situations, not to mention safety issues and difficulty with completing everyday essential tasks. It creates housing insecurity, without a long-term view of modifications that can change over time as people's needs change.

*'There were no proper plans sent to me of the modifications, but I was asked to get quotes without this information. There was a large delay in the providers getting back to me. The providers and the OT weren't emailing me back with the plans. The NDIS was supposed to make it easier for everyone, but it has just isolated me. I was given a quote of \$42 000 for my kitchen alone when the modifications for both the kitchen and the bathroom together could be priced at \$42 000. My modifications were approved last April (2022) and the building only finished on the 24<sup>th</sup> March 2023. I just wanted to be able to use my own oven safely. I had to cut down on physiotherapy and speech therapy to afford the rent for my temporary accommodation whilst my home modifications were being built. Recently my NDIS plan rolled over and with the modifications I lost \$99 000 in allied health supports which means that I had to cut down on essential supports such as gym, my dietician, physiotherapy, podiatry, social work support, speech therapy and hydrotherapy and now I only have enough for physio, gym and podiatry in the plan. I'm going through the s100 process, and I may only have my support worker for 6 more months and allied health workers for 3 more months due to the funding decrease to*

## Investment in Peer Support

***Direct investment through both individual plans and ILC funding for peer mentoring models to build individual and collective capacity through locally led conversations around housing and homes.***

These place-based conversations and **solutions would aim to influence collective change, in addition to individual exploration and design conversations.** QDN has been pioneering work in this area (My Housing Matters workshops) and encourages the NDIA to explore this and similar work that has already been done in local communities. This builds the capacity of people to be self-advocates within the system and provides support from people with first-hand experience navigating complex spaces.

## Increased access to advocacy

***Ensured funding and Increased access to systemic advocacy at both national and state and territory levels for participants to ensure positive outcomes in relation to home and living, particularly for those with complex needs and psychosocial disability.***

The system is complex to navigate, and even for the strongest self-advocates, or for those with informal supports and family to advocate on their behalf, it can be frustrating, demoralising, and for people with disability retraumatising, to constantly battle for your basic support needs. Participants with complex disability, including psychosocial and challenging behaviours, are often left to support themselves. There needs to be processes/procedures to check-in on the wellbeing and safety of people with disability in public and community housing, and in other accommodation to ensure that their supports are still in place. For example, one QDN member had a Support Coordinator who resigned from their position, and the person was left without coordination which resulted in a lack of support workers engaging and left the member socially isolated and unable to leave their home.

## Increased flexibility and reach of Individualised Living Options

***Access to clear, accessible and demonstrative examples of ILO funding as a home and living option at initial planning meetings.***

There has been limited take up of ILO options, and QDN supports the proposed increased flexibility in the use of ILO funding arrangements. There needs to be adequate **safety measures for participants in ILO in place** so that they are always able to afford the supports they need from their budget to fit with increased flexibility of funding. More detail around what this means in practice, particularly for plan and self-managed participants, is needed.

## Digital Inclusion to access home and living Support.

***NDIS funded supports to assist in improving participant digital inclusion through provision of devices and access to support for building capacity to engage online to improve digital literacy for people with disability.***

People with disability are one of the most excluded groups in relation to digital inclusion. For people in the most vulnerable and hard to reach groups, there is limited access to digital devices, ability to afford an ongoing connection and skill in using digital devices for basic information and engagement. With many services and information increasingly only provided in digital formats, it is essential that all people with disability are included in the digital world. Key strategies and programs are needed that increase access to digital devices and have hands-on digital literacy support, so that people with disability are able to access the NDIS more readily, are able to use online portals and navigate the NDIS as well as other important mainstream services which are transitioning to more online support and app-based interactions, such as the Department of Human Services, for example. QDN has a proven project that addresses this, the Access, Affordability, Ability Digital Inclusion project. QDN has submitted the evaluation of the pilot of this program separately to the NDIS review.

# Key Issues

## Choice and control

A lack of affordable and accessible housing options already limits the choice of people with disability to have the living arrangements that most meet their needs and goals. QDN endorses the inclusion of choice and control as principles in NDIS housing models, however question whether these principles are implemented in practice. Members have described NDIS group accommodation as being similar to “enclaves” for people with disability, where there is little access to community. The arrangements in the SIL model still largely sit with the accommodation rather than the individual and have created spaces where institutional practices are still implemented on a smaller scale.

Part of the ILO model relies on the participant to provide ‘supplement’ supports that are unpaid or informal supports for a specific amount of total support times. This is not possible for many people with disability who lack informal supports, and further isolates their choices. ILO exploration and design funding is not well supported by the NDIA and has low rates of approval. The system created to expand and support people’s choice and control over the home and living environment, is preventing this from happening. This is compounded by a lack of knowledge and understanding of what ILO options are, including exploration and design funding, for participants, support coordinators, planners, and LACs. Even if a participant is successful in getting ILO exploration funding, it is difficult to find a support coordinator who can assist in implementing it. There is also a lack of accessible information on ILOs and exploration and design funding, including easy read. Long approval times can result in newly created living options collapsing prior to funding approval.

The SIL model perpetuates congregate, institutional living for people with disability. On its own, SIL could be a way for people to exercise choice and control in their living arrangements: two people could choose to live together, for example, and use SIL funds to share supports and build their capacity for independent living. This is not the way SIL widely has been adopted. Instead, SIL often is coupled with congregate Specialist Disability Accommodation funding, which should be paid to a separate provider but rarely is in practice; or SIL funding sustains support for the occupants of non-SDA group homes owned or managed by the same organisation providing SIL-funded supports.

*“The (SIL) quote is owned by the house and is managed between the provider and the NDIA. I don’t believe people have choice and control as it gives providers too much power.” (QDN Member)*

QDN believes that the intent and structure of the SIL funding model should not just continue to deliver the status quo and channel people into group living arrangements. The current operation of SILS funding does not allow people with disability choice about who they live with and in practice represents a model that essentially operates as a vacancy management approach. SIL funding often doesn’t allow for vacancies, which denies people with disability the ability to move, and members have reported that at times the funding is not timed with the lease, which can force people with disability to break leases into homelessness. QDN believe SIL should form part of a suite of flexible supports that allow participants to make informed choices, achieve independence and enjoy modern, accessible housing in integrated communities. QDN sees that it is imperative that housing and supports are separated to prevent people with disability being compelled to live in particular living arrangements in order to receive essential support, negating their choice and control and human rights. **There needs to be better safeguards in**



**place to ensure the separation of housing and support provision, without this, people with disability will continue to be at risk of exploitation, abuse, and neglect.**

*“For seven years, I’ve been one of more than a dozen residents living at a formerly block-funded facility that has a mix of single-and two-bedroom apartments, a shared dining room where meals are served 3-times per day from a central kitchen (2x choices at lunch and dinner) and a laundry service. My apartment has two bedrooms and a share bathroom in-between. I call it a ‘facility’ because that is how it is referred to over and over in the contract: as in, you are responsible to be courteous to the other residents at the facility. I’ve been there with two other women over that time, but I was not consulted before living with co-residents. Both have now passed on and the room that was theirs is now off-limits to me. I prefer the privacy now I’m the only occupant in my unit. The additional staff interaction and the associated lack of privacy is the most difficult thing to endure. The property owner and the service provider are the same entity. This is never an ideal situation. My accommodation agreement is separate to my support agreement, but the two are linked by clauses such as that one prohibits from purchasing supports (other than Community Access) from any other provider. I feel disinclined to move because everything must change if I do – even when the provider increased by rent by just over 44% because that was the amount on the NDIS Price Guide, with very little notice and no consultation.” (QDN member)*

### Negative Experiences with SIL

QDN members have given mixed feedback in relation to SIL and report that the operating model of SILS places the power and control with the service provider which is incongruent with the intent and principles of the NDIS. Some QDN members have reported that SIL has given them flexibility, and the provision of this funding has enabled some members the option to move out of the family home for the first time in their life. QDN supports the provision of funding for support and capital provided through the NDIS, and in principle support to Specialist Disability Accommodation and SIL that enables a broad range of options for people with disability to have choice and control and achieve independence. QDN believes creative, flexible housing and support options are the key to the delivery of NDIS objectives.

Checking in with participants about their level of satisfaction with their SIL arrangement is not necessarily effective given people may never have had the opportunity to make choices about where and how they live. Working through choices and options takes time, and people need to process what their lives could look like with the range of options the NDIS can bring.

Ensuring that participant check-ins are meaningful and include discussion about people’s views and wishes in relation to changes to their current arrangements, or possible alternative options such as ILO’s is crucial. Feedback received by QDN indicates that to date people have often been unaware their SIL arrangement is rolling over and had no opportunity for input to changes that might have been possible. This continuation of legacy arrangements and group homes has meant that there may have been no real change to people’s situations with transition to the NDIS, no presentation of contemporary or innovative alternatives, and no chance to explore options.

People with disability living in SIL arrangements are effectively paying rent for housing and living arrangements that they don’t always have choice and control over and in some cases, might not actually want.

*“When you live in a group home, you don’t get any choice about who you live with and (the service) moves people around to different houses and sometimes you live with other people you don’t know.” (QDN member)*

For some people, having the opportunity to apply for SIL as part of their NDIS plan has enabled them to explore moving out of the family home in the same way as their siblings without disability however this has been met with challenges, particularly for people with complex support needs. A QDN member reflected on the experience of one family:

*“I know a family who has worked really hard to support their son to get SIL, but there seems to be a reluctance on behalf of services to take on ‘complex clients’ in favour of people with lower needs. How do we make it work so people with high and complex needs are always taken care of?” (QDN member)*

This raises a potential barrier for people who already have few options available to them to explore living independently.

Although Australia has gradually moved away from institutions and group home models of housing, Supported Independent Living (SIL) is becoming the contemporary version of small-scale institutional living and is still a principal model of accommodation under the NDIS, with 29, 812 SIL participants as of December 2022 and with most recent data showing a substantial growth in SILs funding (NDIS conference 2023). QDN acknowledges that people with disability have benefited from the move from large institutional settings into a different living arrangement, such as SILs houses, however the experiences for many people with disability living in or who have lived in group homes include social isolation, denial of basic human rights, and the experience of violence, abuse, neglect, and exploitation.

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### Difficulty Navigating the NDIS housing service system

There are many people with disability who experience additional disadvantage in being able to navigate the housing system, and access information in a way that meets their individual needs. People with disability, particularly those with cognitive and intellectual disability and people from Culturally and Linguistically Diverse and/or Aboriginal and Torres Strait Islander backgrounds can experience additional challenges because of their need for information in user-friendly formats and/or their lack of proximity to services. There are less options available for people with disability living in regional, remote and rural areas as there are generally less services available in these areas.

QDN members report confusion between the different NDIS housing models and services as well as a lack of consultation about their housing options in NDIS planning meetings.

QDN sees that training for LAC and NDIA planners around changing the conversation is an essential part of a planner’s training, supervision, and demonstration of change in practice. Furthermore, QDN members urge the NDIA to include people with disability as part of the workforce to deliver staff training. It is important that training is co-designed and co-delivered with people with disability. They are the experts and should be treated as such and looked to for their expertise. NDIA planners, support

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<sup>17</sup> Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (2019). Group homes: issues paper.

coordinators and service providers all need to work in a way that does not drive people to the belief or understanding that SIL is the only option for them.

Independent and preferably specialised Support Coordinators require specific training and development in order to work effectively with participants to assist them to build their capacity, and to explore accommodation and support options with them, their families and supporters. Specialised support coordination should be included in participant plans to allow planning for the future, potentially working towards different accommodation and support models. QDN believes the separation of housing, support and support coordination is vital to ensure participants can access the options most likely to enable them to achieve their goals without conflicts of interest in the provision of their supports.

### Funding Issues

It can be challenging for people with disability to have a full understanding of what they are funded for, to know whether that is what they are being funded for is what they are receiving through their SIL arrangement and to be in a position of control in terms of being able to speak up. People need access to both independent and systemic advocacy for support to address this power imbalance. Participants need to be clear about what their proposed Roster of Care will look like on the ground, and have full understanding of the range, frequency and level of their individual and shared supports, both regular and irregular. Participants should have the ability to plan for holidays and the freedom of some flexibility. There should also be full understanding of the elements included in participant plans overall, detailing what SIL provides along with other plan elements. Often grant funding goes towards administration rather than outcomes.

### Lack of SDA options and lengthy approval process

QDN notes that most of the current NDIS Specialist Disability Accommodation (SDA) residents live in premises that were previously State Government funded group homes and receive Supported Independent Living (SIL) funded NDIS supports, as part of legacy arrangements.

Many SDA homes are sitting vacant because of the wait times on approval of SDA for participants and the lack of locations where SDA stock is available.

Members have similarly commented that the process of getting home modifications under the NDIS is arduous, takes too long and that they are often quoted and priced too high.

*“There were no proper plans sent to me of the modifications, but I was asked to get quotes without this information. There was a large delay in the providers getting back to me. The providers and the OT weren’t emailing me back with the plans. The NDIS was supposed to make it easier for everyone, but it has just isolated me. I was given a quote of \$42 000 for my kitchen alone when the modifications for both the kitchen and bathroom together could be priced at \$42 000. My modifications were approved last April (2022), and the building only finished on 24 March 2023. I just wanted to be able to use my own oven safely. I had to cut down on physiotherapy and speech therapy to afford the rent for my temporary accommodation whilst my home modifications were being built. Recently, my NDIS plan rolled over and with the modifications I lost \$99 000 in allied health supports which means that I had to cut down on essentials such as gym, dietician, physiotherapy and speech therapy and hydrotherapy and now I only have enough for physio, gym and podiatry in the plan. I’m going through the s100 process, and I*

*may only have my support worker for 6 more months and allied health workers for 3 more months due to the funding decrease in my plan.” (QDN Member)*

Innovative approaches to supporting people into home ownership must be co-designed with people with disability and championed by the NDIA, as must other solutions such as an increase in social housing stock.

In addition, changing the conversation extends to community, to raise awareness and drive change around community attitudes and investment in accessible, liveable, flourishing communities. As identified previously, this policy context is within national agreements and strategies across housing and disability including the National Disability Strategy, the Information Linkages and Capacity (ILC) Building program, and State/Territory and Local Government disability plans.

### Regulation, accessibility, transparency and accountability

QDN sees that it is critical that the NDIA promote accessibility and transparency by providing more comprehensive information about the range of multiple living options, including ILO, SIL, and SDA on the NDIS website, including Easy Read material, professional translations, and descriptive information.

Currently there is a lack of regulation in the NDIS Home and Living market. Members have expressed the need for more transparency from NDIS Home and Living staff as well as accountability of their practice, particularly given many reports of abuse and unethical practice in these settings.

### Silos between government departments and the NDIS

QDN members report that there is often confusion between the Department of Housing and the NDIS around housing options and the best ways to support people with disability into housing and responsibility for supporting a participant is palmed off from the NDIS to the Department of Housing and vice-versa.

Members have also commented on a general lack of collaboration between the NDIS and mainstream services and the risk that a lack of holistic, wrap around support from services can pose to vulnerable young people seeking accessible, safe and secure home and living options.

Greater collaborative decision making between the NDIS and Queensland Health, the Department of Housing, the Department of Child Safety and the Department of Youth Justice for example, will decrease the silos and ensure that people with disability receive holistic support and are able to explore all the best ways they live independently and be supported to do so. This collaboration will help to support people into housing who are in vulnerable situations such as:

- Parents with disabilities
- Young people leaving Child Safety care arrangements
- People with disability experiencing domestic and family violence and/or institutional violence
- People with disability living in regional, remote and rural areas.

### Digital Divide

An assumption cannot be made that all people with disability can access the NDIS through digital devices such as phones, tablets and computers as well as the internet and other digital platforms. The

Australian Digital Inclusion Index (ADII) illustrates, many people with disability do not have access to digital devices, the internet, and therefore critical services such as the NDIS<sup>18</sup>. The national digital inclusion score for Australians with disability is 47.0, in comparison to the Australia-wide score of 56.5<sup>19</sup>. The index has also found that affordability and education impact significantly on access to technology. Australians with disability scored lower in the affordability rating in comparison to the National average, and experience lower levels of education than those without disability (21% left school before age 16 compared to 8.9% without disability)<sup>20</sup>. The statistics are even starker for completion of Grade 12 for people with disability; only 34% aged 20 or over completed, compared to 66% of those without disability).<sup>21</sup>

Many of the most vulnerable people with disability, particularly those with complex disability, psychosocial disability and intellectual disability do not have access to a digital device, cannot afford to be connected digitally in an ongoing way, and do not have the skills to use a device at a basic level (to send texts, email, or navigate websites). These barriers are increased for First Nations and culturally and linguistically diverse people with disability. We need more rigorous data on the needs of this group, as they are currently excluded from any online access and the choice and control offered by Platform Providers in connecting supports is out of their reach. Currently, most research into digital inclusion for people with disability has focused more on accessibility and usability of digital technologies and content.

The NDIS can support digital inclusion to better meet life and home and living goals.

## Conclusion

In conclusion, housing plays a crucial role in ensuring the inclusion and full participation of people with disability in community and family life, as well as their rights as citizens in Australian society. However, the current reality often limits the choices of individuals with disability, with decisions regarding living arrangements being made by others such as family members, guardians, NDIS nominees, NDIS planners, service providers, and policy makers.

To enable people with disability to make meaningful choices in their lives, including decisions about where and with whom they live, Australia must fulfill its obligations under Article 12 of the Convention on the Rights of Persons with Disabilities. This entails replacing substitute decision-making with supported decision-making that respects the rights, will, and preferences of people with disability.

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<sup>18</sup> Thomas, J, Barraket, J, Wilson, C, Ewing, S, MacDonald, T, Tucker, J & Rennie, E, 2017, Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2017, RMIT University, Melbourne, for Telstra. DOI: [www.dx.doi.org/10.4225/50/596473db69505](http://www.dx.doi.org/10.4225/50/596473db69505)

<sup>19</sup> Thomas, J, Barraket, J, Wilson, C, Ewing, S, MacDonald, T, Tucker, J & Rennie, E, 2017, Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2017, RMIT University, Melbourne, for Telstra. DOI: [www.dx.doi.org/10.4225/50/596473db69505](http://www.dx.doi.org/10.4225/50/596473db69505)

<sup>20</sup> Australian Institute of Health and Welfare (2022) [People with disability in Australia](#), AIHW, Australian Government

<sup>21</sup> Australian Institute of Health and Welfare (2022) [People with disability in Australia](#), AIHW, Australian Government

Co-design should be prioritised in the development of decision-making processes, policies, and procedures in the home and living space. By involving people with disability, along with their families and relevant stakeholders, in the design and implementation of housing solutions, we can ensure that their voices are heard and their unique needs and preferences are taken into account.

By embracing co-design and supported decision-making, Australia can create a more inclusive and accessible housing environment that respects the rights and autonomy of people with disability. This will not only enhance their quality of life but also contribute to a more equitable and inclusive society as a whole.

# Appendix 1

## QDN's Housing Principles

### **Rights**

- People with disability have the same rights to housing assistance as other people and should be supported to exercise those rights. This means:
- Housing is designed to enable family and friends with disability to visit.

### **Choice**

- People with disability choose where, how and with whom they live. This means: People can afford to live in housing suitable to their needs.
- People are able to make informed decisions about their housing choices.

### **Inclusion**

- Housing enhances the independence and social and economic participation of people in family and community life. This means:
- Housing is non-congregate and encourage a mix of occupants with and without disability in housing developments.
- Housing is located within communities close to amenities and services.
- Housing is designed to meet the principles of universal housing design as developed in the Liveable Housing Design Guidelines and incorporates assistive technology as needed.
- Queenslanders are educated and aware of benefits of universal housing design and the need to include people with disability in local communities.

### **Control**

- The provision and management of housing is separate from the provision and management of paid support. This means:
- Housing is primarily a person's home, not someone else's workplace.
- A person can change their housing without affecting their support arrangements.