



National Disability Insurance Agency Draft Strategic Plan 2013 – 16

Submission

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DETAILS

Children with Disability Australia welcomes the opportunity to provide feedback on the consultation of the National Disability Insurance Agency's Draft Strategic Plan 2013 – 2016.

Children with Disability Australia (CDA) is the national peak body that represents children and young people with disability, aged 0 – 25 years. The organisation is primarily funded through the Department of Social Services (DSS) and is a not for profit organisation. Additional project funding is also currently received by the Department of Education. CDA has a national membership of 5000 with the majority being families.

CDA's vision is that children and young people with disability living in Australia are afforded every opportunity to thrive, achieve their potential and that their rights and interests as individuals, members of a family and their community are met.

CDA undertakes the following to achieve its purpose:

1. **Education** of national public policy-makers and the broader community about the needs of children and young people with disability.
2. **Advocacy** on behalf of children and young people with disability to ensure the best possible support and services are available from government and the community.
3. **Inform** children and young people with disability, families and care givers about their rights and entitlements to services and support.
4. **Celebrate** the successes and achievements of children and young people with disability.

GENERAL COMMENTS

- CDA welcomes the Australian Government's continued support of the National Disability Insurance Scheme including the current launch sites currently active in Tasmania, South Australia and the Hunter and Barwon regions.
- The Draft Strategic Plan (the Plan) provides a good base for the operations of the National Disability Insurance Agency (NDIA) over the next three years whilst still in the initial launch phase.
- CDA believes this document should be comparable to other Strategic Plans of like organisations (in terms of turnover and client base) and to be regarded in the same light. For example the *Western Australian Disability Services Commission Strategic Plan 2011–2015*, the *New South Wales Lifetime Care and Support Authority's customer service charter*, *Department of Human Services Strategic Plan 2012–2016* and *Medibank Private Ltd Statement of Corporate Intent 2013 – 2014*. Currently the document has aspects that detract from this, such as the use of undefined terms, buzzwords, sentences which leave the reader struggling to understand the action described and emotive language. CDA encourages the NDIA to re-examine the document with a focus on using language that is becoming of an organisation of this size and influence.
- CDA understands that the NDIA has an important balancing act to perform in regards to community expectation and financial sustainability. CDA is of the opinion that these two principles need to be addressed simultaneously throughout the Plan — or at least each one consistently. There are sections of the Plan (Goal 1), which do not mention any

aspects of financial sustainability. It is vital that expectations remain consistent throughout all parts of the Plan.

- CDA applauds the NDIA for including Performance Outcomes throughout the Plan but there inclusion does raise further issues. It is unclear throughout the Plan as to how these will be measured (qualitatively or quantitatively) or the method that would be used to achieve these outcomes. CDA is of the view that more detail for each of these indicators should be included in the Plan. CDA believes that only with a clear ability to measure outcomes will this document and the contained goals be as useful as possible.
- CDA is pleased with the discussion of the *National Disability Strategy 2010 – 2020* within the Plan as without Government working to achieve the vision of the *National Disability Strategy 2010 – 2020* inclusion for people with disability will not be achieved. CDA also notes that whilst the NDIA has a large role to play in effecting cultural change it is also the role of all governments through all programs they deliver to work towards inclusion of people with disability.
- CDA is pleased to see the inclusion of the fourth principle contained in Appendix 1. CDA would like to encourage the NDIA to take this principle and further include it throughout the Plan, therefore giving the NDIA a strong role in effecting mainstream change with the flow on effect increasing the economic participation of people with disability and hence a larger tax base. CDA notes that whilst the rationale for this principle differs from the above point — there aim is very similar.
- CDA would like to encourage the NDIA to not be constrained by a thought that the Plan needs to be a short and concise document. CDA acknowledges that there is a balance to be had on usability and detail but this should not be at the loss of making the Plan a truly useful document which lays out a clear and measurable plan for the next three years.

SPECIFIC COMMENTS

Vision and Mission

- CDA applauds the plan for prioritising working with people with disability, their families, carers, service providers and advocacy organisations to achieve a world leading disability system.
- CDA would like to see explanation and definition of terms such as ‘critical priorities’ and ‘our dedicated culture’ to provide further understanding of what the aims are to be achieved. Given the shareholders of the NDIA are all Australians it is necessary to ensure the Plan is accessible and free from language or terms that are ambiguous.
- It is CDA’s view that the term ‘integration’ is an out of date term and not consistent with other Government publications including the *National Disability Strategy 2010 – 2020* (NDS). CDA would like to see it replaced with ‘inclusion’ — which is currently used in some places through the Plan — to ensure consistency and ensure that contemporary language is used to progress the vision of the NDIA. There is also a difference between the two terms with integration generally assuming there is something wrong that must be fixed in order to fit into the community where as inclusion is the active participation of everyone as a full member of community.

- CDA is pleased to see acknowledgement and discussion of the NDIS as one aspect of the broader disability policy reform of the NDS. CDA believes that the reform that the NDIS is bringing to the disability service system is vitally important but without working with other mainstream service systems, the vision of the NDS will not be reached.
- It is CDA's view that the Vision on the NDIA should have more meaning than its current form. Whilst CDA understands the sentiment of the Vision, we believe that it should speak to all Australians about what the aim is of the NDIS.
- Once again CDA believes that the inclusion of 'Culture' overarching within the diagram is not specific. CDA would like to see a further explanation or expansion to make this clearer – for example is it the culture of the agency, or the culture of Australia?
- CDA is unsure about the use of emotive language such as 'pride' and as per the examples raised above which may be viewed as inappropriate for a strategic plan.

Culture

- CDA is pleased to see that the NDIA is taking the time to develop its values and being able to articulate those values. However, CDA is concerned that in the current form that this section may be taken as sounding conceited and insincere. CDA suggests that this section of the Plan be reexamined to place the focus on the NDIA as a facilitator for the person with disability, not the one solely taking action.
- As mentioned previously, CDA would like to see the term 'integration' replaced with inclusion for the reasons stated above.
- Following on from point 1. CDA identifies the Learning and Integrity sections should be re-examined. CDA also encourages the use of language that comparative organisations use in similar documents.

Goal 1

- Once again CDA is concerned that the language used within the entire Goal is not at the level that would be expected for an organisation with an annual budget of nearly \$6bn in 2016 – 17 as outlined below. It should be more direct, outcome focused and measurable to make the document a platform to build on.
 - It is CDA's view that this Goal is not consistent with the next Goal given that there is little mention of the principles of 'reasonable and necessary'. CDA would like to see consistent and clear expectations of what the NDIA will provide a person with disability to achieve their goals within the context of being financially sustainable.
- (a) CDA is worried that as currently drafted, people with disability are not at the center of the outcomes that are trying to be achieved. Such an example is Outcome A that could easily be remedied by rewording as, 'Provide the means for people with disability to build capacity...'
 - (b) CDA would like to see terms used in Outcome B such as 'vulnerable' and 'marginalised' defined and quantified to allow for this document to act as a baseline to allow for progress to be quantifiably measured over the life of the Plan.
 - (c) CDA notes that the wording of Deliverable 1 as currently stands is not suitable for children with disability. CDA acknowledges that whilst this may be relevant to adults with disability their needs to be a different approach to planning that is appropriate for children with disability which also acknowledges the family context.

Performance outcomes

- CDA finds the second outcome troubling with its relevance to children. Children, particularly young children, are not independent or economic participants in the community.
- CDA is of the view that there should be specific inclusion, of outcomes which are relevant to children. It is not seen as acceptable to not acknowledge the differentiation required for children by simply omitting to include child relevant outcomes.
- Accordingly it is recommended that child focused outcomes are developed in line with the Convention of the Rights of the Child and as per the National Disability Insurance Scheme Act 2013, Part 2(1) (i) (iii). Specific reference is made to Sections 3, 4, 5, 12, 13 and 23 of the Convention.

Goal 2

- (a) CDA is pleased to see an emphasis placed on ensuring the NDIS is financially sustainable into the future that will provide certainty of funding and support over many of CDA's member's lifetime.
- (b) Whilst CDA is very pleased to see the inclusion of a deliverable item focusing on other service systems and agrees with the sentiment it is questionable whether this is a realistic goal to be setting for a strategic plan that has a lifetime of three years. CDA suggest that the wide natured deliverable could be refined to a number of specific outcomes that are sought over the lifetime of the Plan. CDA would also like to see further mention of the relevant outcomes of the NDS outlined in this section.
- (c) CDA acknowledges the need for a highly quality and responsive workforce to ensure that the NDIS is not only able to service the increase in demand of services but also to allow for true choice and control of services. CDA however is concerned that if this task is solely left to the NDIA, without other government bodies such the Department of Education, the Department of Employment and the Department of Industry having a role, it would not be achievable. CDA would like to see emphasis placed on this outcome from Government as a whole to ensure the best possible outcome.

In regards to Deliverable 3, CDA questions if the role of research should have a larger role to play within the NDIA. Given the legislative requirements of the NDIA to place on research (Section 118, (c) and (f)) CDA views that this Deliverable should be expanded to a stand alone Outcome given how important the research agenda will be in further informing the expansion of the scheme and best practice.

Performance outcomes

- CDA is encouraged to see the inclusion of the focus on strong accountability mechanisms to ensure the financial viability of the NDIS.

Goal 3

- As outlined previously CDA would like for terms such as 'community' further clarified, as it is unclear to which community it refers to here — i.e. the Australian community or 'disability' community?
- CDA is unsure if the use of emotive language such as 'pride' as it may be viewed as unprofessional for a strategic plan.

- (a) CDA is pleased to see an emphasis being placed on the NDIA working cooperatively with stakeholders to ensure that all views and experiences are incorporated into the learning's of the launch period before further expansion. However, CDA is confused in regards to Deliverable 3 as why the NDIA would only work with the disability sector on this deliverable. This seems counter-productive as the broader community are the ones who will need the most education about what a NDIS is and then to build their trust in it.
- (b) CDA acknowledges the role of all State and Territory Governments in the NDIS and the financial contribution which they have made to ensure a national scheme. However CDA is concerned that such an emphasis is being placed in the Plan on the NDIA to 'work constructively with Governments' and would have assumed that this task is already being undertaken.

CDA would like to also see the inclusion of the joint work being undertaken by all Governments to ensure that the provision of services and referrals to those not receiving full packages (Tier 2) along with a measurable performance indicator.

Furthermore, CDA hopes that the same data that is outlined in Deliverable 3 to be provided to governments will also be provided in a timely and transparent nature to all Australians given they are all effectively shareholders in the NDIS.

- (c) CDA is pleased to see this Outcome included, as it is an important task that may be viewed by some as ancillary.

Performance outcomes

- Whilst CDA's view is that expectations of the NDIS should be actively managed by the NDIA, the first point makes the assumption that community expectations are consistent. CDA is acutely aware of varying community expectations across Australia and suggests that this deliverable is reworded to incorporate the need of some to raise expectations and others to be reined in.
- CDA agrees with the sentiment of the second deliverable but is not convinced that it will be achieved through the implementation of the NDIS alone. CDA would encourage the NDIA to take this task on but would also like to see a similar goal reflected in similar documents from Government bodies delivering mainstream services. CDA believes this is consistent with the NDS.

Technology

- CDA would like to see more details about the utilisation of technology for the NDIA beyond what is provided in this single page. CDA believes that there are numerous factors that are not addressed including research, best practice, appropriate technologies used for the person with disability and how the provision of technology will be administered.

CDA would welcome the opportunity to discuss this submission with the relevant representatives of the National Disability Insurance Agency.