



'Shaping Our Future: Discussions on Disability Rights'

National Consultation Paper

Australian Human Rights Commission

Northcott's Submission in Response

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Terms of Reference

As part of the National Consultation launched by the Disability Discrimination Commissioner at the Australian Human Rights Commission, participants in the consultation process are invited to provide feedback on the following priorities:

1. Criminal Justice System
2. Education
3. Employment
4. Housing
5. NDIS

Responses will be given to address the below three questions asked by the Commissioner:

1. What do you think needs to change to see the rights of people with disability better protected in these proposed areas?
2. What do you think is already being done well in these areas that could be built upon to achieve greater systemic change?
3. What would you like to see the Disability Discrimination Commissioner do to most effectively advance the rights of people with disability in these areas?

Overview

Northcott is a leading service provider in NSW and the ACT, providing services and support for people with disabilities, their families and carers. For over 85 years, Northcott has supported children, young people and adults with disabilities to develop life skills, build confidence and become active participants in their communities.

Northcott is a client-centred, value-based organisation and is one of Australia's leading disability services organisations. We support over 14,000 people with disability and their families to reach their full potential and participate in their communities. We work in partnership with clients, stakeholders and other service providers to assist people and their communities to achieve their goals.

As well as understanding the substantial evidence base that supports mainstream inclusion as the best driver of good outcomes for children with disability, our values are that all people should be able to live in an inclusive society and live the life they choose. We view mainstream inclusion for children and adults as a human right and this belief permeates all of the work that we do in all our services.

We provide over 100 different services and programs across all life stages from newborns to older people. We strongly support and demonstrate innovative approaches to ensuring that children and young people can access their full potential through the education system from early childhood to adulthood.

Focus

Northcott welcomes the opportunity to provide a submission on the following three areas:

- Education
- Employment
- Housing

Methodology

Northcott has structured the submission by first looking at the three areas of education, employment, and housing in isolation and identifying the main issues for each of those and providing publicly available data to support those assertions.

To further strengthen the validity of those arguments, Northcott will discuss current insights and marry this with the lived experiences of the clients with disability we support to present a clear and persuasive submission.

Employment

A. Current Insights

1. Passage of significant human rights legislation in past two decades has not fully addressed underemployment or unemployment among people with disability

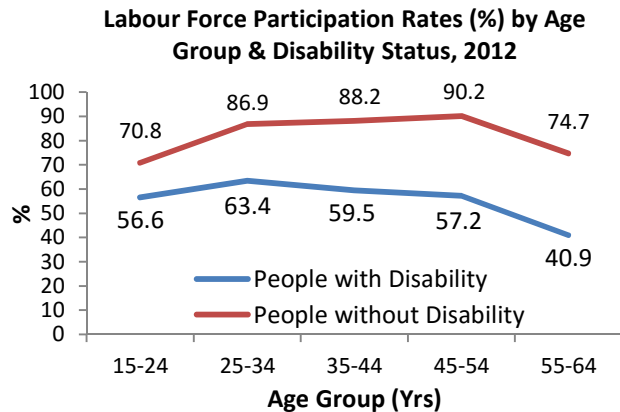
Despite the passage of the federal Disability Discrimination Act in 1992, and Australia's ratification of the UN Convention on the Rights of Persons with Disability in 2008, one of the first countries to do so, progress in integrating people with disabilities into the labour force remains elusive and halting. Between 1993 and 2012 the labour force participation rate for working-age people (15-64) with disability has barely changed and has actually fallen slightly from 55% to 53%. In contrast, over the same period, the participation rate for working age people without disability increased from 77% in 1993 to 83% in 2012.

There is a similar story with unemployment. Unemployment for those with disability has declined in line with the national trend from 18% in 1993 to 9% in 2012 but is still nearly double the national average for those without disability at 5%.¹

2. Young people with disability entering the jobs market much more likely than their peers without disability to be underemployed and gap increases with age

¹ 'Survey of Disability, Ageing and Carers', Australian Bureau of Statistics, 2012

Examining labour market statistics over the past twenty years reveals that there is a clear disparity in labour force participation between people with and without disability, which widens with age. The labour force participation rate increases for people with disability right up until they're 45-54 before dipping for those aged 55 to 64. In contrast, for people with disabilities, the labour force participation rate drop occurs much earlier, in the 35-44 age group segment, entrenching disadvantage for people with disability from an early age.

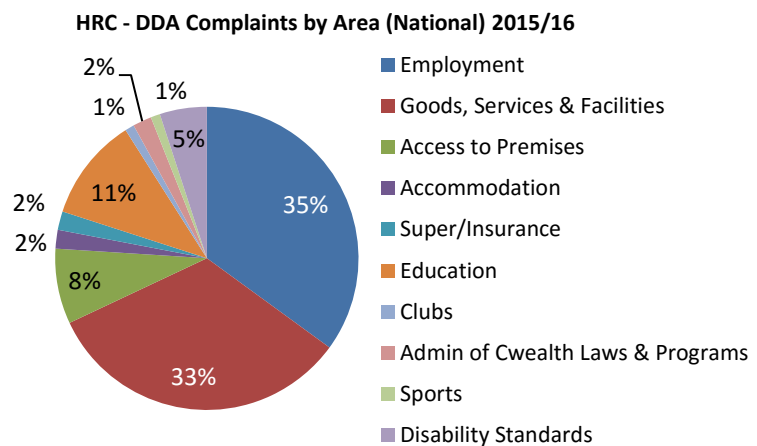


3. Underemployment issue compounded by large share of PT workers with disability who want to work more

People with disability who were employed were more likely than people without disability to work part-time (40% and 30% respectively).² Almost one-third of people with disability (32%) who were working part-time wanted to work more hours, compared with just over one-quarter of people without disability (27%). The level of underemployment varied with the severity of the disability, ranging from 22% of those with a profound core activity limitation to 38% of those with an educational or employment restriction only.

4. Twin issues of underemployment and unemployment evidenced by employment-related complaints comprising the largest share of complaints under DDA

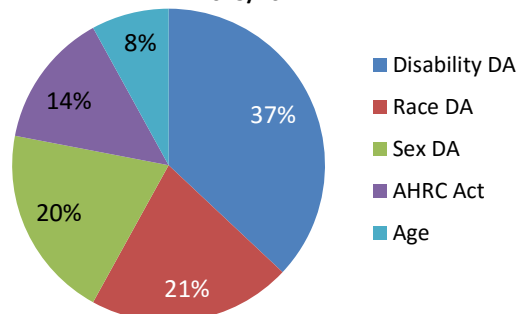
People with disability are experiencing unemployment and underemployment at much higher rates than the national average even though increased numbers want to work. Employment-related complaints comprise the largest share of all complaints reported under DDA, at 35% in 2015/16. This indicates both the desire of people with disability to work and that they are still facing barriers to employment despite anti-discrimination legislation.



² 'Survey of Disability, Ageing and Carers', Australian Bureau of Statistics, 2012

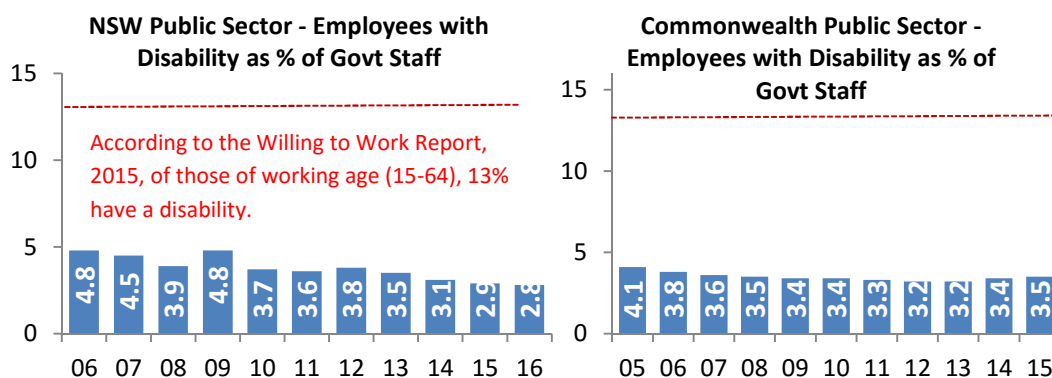
More broadly, people with disability are more likely to report a complaint under the DDA than other comparable disadvantaged groups reporting complaints under equivalent legislation. For example, Disability Discrimination Act-related complaints accounted for more than a third of all complaints reported in 2015/16, highlighting that many people with disability are encountering issues that are not being resolved without recourse to the Australian Human Rights Commission.³

HRC - Complaints by Legislation (National)
2015/16



5. Underrepresentation of people with disability in the government workforce at state and federal level

The implementation of the Disability Discrimination Act, ratification of the UN Convention on the Rights of Persons with Disability, and creation of more government policies around employment of people with disability have not translated into actual improved employment practices for people with disability. According to the NSW Public Service Commission, the share of NSW government employees with a disability fell from 4.8% in 2006 to 2.8% in 2016.⁴ For the Commonwealth, the downwards trajectory has not been as pronounced and in past few years, the share of Commonwealth Government employees with a disability actually increased from 3.2% in 2012 to 3.5% in 2015, but still below 4.1% recorded in 2005.⁵ The Willing to Work 2015 Report⁶ indicated that the share of people of working age (15-64) that had a disability was 13%, well above levels seen in the public sector.



³ Annual Report, Australian Human Rights Commission, 2012/13 & 2015/16

⁴ State of the NSW Public Sector Report 2016, Public Sector Commission, 2016

⁵ Representation of People with Disability Data, Australian Public Service Commission, 2015

⁶ 'Willing to Work', Australian Human Rights Commission, 2016

6. Despite clear economic argument, people with disabilities are not able to fully realise their right to full social and economic participation

There remains a clear economic argument for integrating people with disabilities into the broader economy. The Australian Network on Disability commissioned Deloitte to produce a report on the impact of stagnant labour force participation rates and unemployment of people with disability.⁷ To close the gap between labour market participation rates and unemployment rates for people with and without disability by one-third would result in a cumulative \$43 billion increase in Australia's GDP over the next decade in real dollar terms. Modelling also suggests that GDP will be around 0.85% higher over the longer term. These estimates only account for the direct impact on GDP and do not include indirect effects from improved government fiscal balances and increased employment opportunities for carers.

B. Northcott Experience

Northcott is a provider of Disability Employment Services (DES), which is currently funded by the Australian Government's Department of Social Services until March 2018. Northcott has a strong history in providing vocational skills training and employment services to young adults with disabilities. Northcott has been a provider of disability employment services since 1993 and supports clients with a wide range of disability types, including autism, physical, and intellectual, in the Sydney metropolitan area. Northcott is projected to place 150 clients with employers in 2016/17.

To illustrate how those aforementioned issues actually impact people with disabilities, Northcott has documented the lived experience of clients with disability that are supported in employment:

1. Barriers to employment for people with disability begins in high school

For many clients with disability attending vocational skills training at Northcott, it is often the first time that they come into contact with a provider specialising in vocational skills for people with disability. For those attending mainstream education services in a high school environment, many of the work experience opportunities have not been available to them as schools may not have resources or skillsets to effectively place students with an employer. Exacerbating this trend is that many young people with disability often do not have part-time jobs at school, missing out on the crucial development of soft skills necessary to make traction with employers at a later age.

2. Networking and professional development opportunities are limited and where available can pose challenges for people with disability

Northcott DES reports that clients often have difficulty in making traction with employers with no direct experience of potential candidate for job which networking can often help bridge. However, people with disabilities often do not have the same outlets available as the wider

⁷ 'The economic benefits of increasing employment for people with disability', Deloitte Access Economics, August 2011

population have in terms of connecting with new contacts and mentoring initiatives that can lead to other opportunities. Not being able to access those networking opportunities can deprive people of disability with professional development opportunities and the ability to further develop soft skills necessary to succeed. For example, according to a LinkedIn 2016 survey, approximately 85% of jobs are found via networking.⁸

Even where networking opportunities are available, many people with disability can find those events challenging with perception that disability may be misunderstood or that they would feel embarrassed by their disability and that potential employers may not see them as employable. Misunderstanding and issues around management of disability remains a challenge for jobseekers with disability in the labour market. As a result, while many jobseekers with disability receive generalised advice they do not have access to specific and customised advice for graduates and jobseekers on the same terms of those not living with disability.

3. Challenges persist in identifying employers receptive to hiring people with disabilities

Northcott DES often encounters resistance from companies in initial prospective phone calls to secure work experience placements and discuss potential employment options. Although the share of rejections directly attributable to grounds of discrimination against disability is unknown, it is clear that there remains an urgent need to address reluctance on the part of employers to recruit people with disability. In addition, there is still a perception among many employers that it's too hard to recruit people with disability. Northcott DES staff report that in conversations with prospective companies many responses often cite past issues in recruiting people with disability. For example, many organisations have spoken of challenges in recruiting people with disability in the past and some have commented that they wouldn't want to go through the process again.

4. Gap between rhetoric of corporate policies expressing commitment to recruitment of people with disabilities and action

A major issue confronting people with disability seeking employment, and those supporting them, is that while many corporate organisations espouse inclusion rhetoric, their employment practices do not support inclusion and are often indirectly discriminating against people with disability. Northcott DES staff frequently have to “fight the fight” with individual managers at companies with a public commitment to recruitment of people with disabilities and make a business case for employment of people with disability. In addition, staff also reported that a major national employer with thousands of employees, with many of its company publications professing commitment to employing people with disability, have recruited a minimal number of people with disability.

⁸ *New Survey Reveals 85% of All Jobs are Filled Via Networking, LinkedIn, 2016*

5. Growing economic trend of outsourcing recruitment has indirect effect of discrimination on people with disability

Another issue facing people with disability is the impact of the increased use of external recruitment companies in the hiring process, many of which do not have explicit corporate policies and/or employment practices that commit to employing people with disability, which may place them at odds with the very companies that they are recruiting for.

Furthermore, the current commission-based model that many recruitment firms work on may adversely impact jobseekers with disabilities who may need greater resources invested at beginning of recruitment process in terms of time to discuss disability disclosure and any related accommodation needs, which may be more costly and be at odds with recruitment companies who are looking to maximise efficiency of placement of jobseeker with or without disability.

6. People with disability with narrow set of skills disproportionately impacted by rigidity of job requirements in position description

Employers often request candidates to be multi-skilled but very few candidates, particularly those with narrow set of skills, can meet full specifications of job description, with greater flexibility and alternative working styles needed. For example, people on the autism spectrum may not meet all the requirements of a formal job description due to weaker soft skills but frequently have skills relating to science, technology, engineering and mathematics (STEM) that are being overlooked by many employers.

7. Disability disclosure presents obstacles to successful recruitment

Northcott DES staff report that many individuals with disabilities looking for work often do not disclose their disability due to fear of it negatively prejudicing applications and can often be unable to articulate how it impacts on working style and adjustments needed. Conversely, recruitment managers are often reluctant to broach the subject of disability and workplace accommodation/adjustments due to not having information/training on how to have such types of conversations.

8. Disparity in financial incentives offered to employers hiring people with disabilities and other groups

Employers have a range of financial incentives available for recruiting not only people with disabilities but also to other groups who historically have encountered barriers in gaining employment, such as older workers and Indigenous Australians. However, such financial incentives vary in amount for different groups of people. For example, the wage subsidy scheme for older workers, Restart, is more generous, providing employers up to \$10,000 for mature eligible jobseekers over the age of 50. In contrast, for jobseekers with disability, employers can receive up to \$1,500.

9. Limitations of current disability employment services model in terms of choice and flexibility for person with disability

With the current contract for delivering Australian Government-funded DES up for renewal in 2018, the Commonwealth Government is undertaking a review of the current DES model. The DES has invited participating employers to respond to a discussion paper examining how the current operational model for delivery of services among DES-funded providers can be improved on. In response, Northcott has provided a number of recommendations (contained in the recommendations section. The full submission is also attached as appendix A).

C. Recommendations

In response to the issues identified, and backed up by publicly available data as well as the lived experiences of the clients that Northcott supports, it is recommended that the Disability Discrimination Commissioner considers the following measures:

- I. Recognise the importance of proactive measures in bridging the labour market participation rate between those with and without disability, particularly in the 15-34 age bracket, including extending specialised vocational skills services to those with disability aged 12 years and onwards whilst still at school.
- II. Develop, communicate and publicise work experience/networking initiatives/schemes to provide jobseekers with disability with professional development opportunities.
- III. Hold panel discussion and solicit feedback from range of employers and graduates and jobseekers with varying types of disability on what issues are faced by different people in the industry and develop best practices.
- IV. Chair employer roundtable to identify best practices in terms of supporting employers to become more receptive to recruiting people with disability and determine how to close gap between corporate policies expressing commitment to recruitment of people with disability and actual employment practices.
- V. Investigate and ensure that financial incentives available to employers for hiring people with disability are on par with other groups, such as older Australians and those with Aboriginal backgrounds.
- VI. Develop case studies of successful types of working arrangements which required out of the box thinking in terms of reimagining job roles for people with disability who may have a narrower but more specialised set of skills, e.g. people on the autism spectrum in an IT-related role, to allow potential employers to see a wide range of roles that can be adapted.

- VII.** Lobby government at state and federal level to step up and be a role model in employing people with disabilities, encouraging greater use of internships, work experience programs, mentoring and networking opportunities to build a pipeline of talent in the public sector workforce.
- VIII.** Host roundtable on outsourced recruiting and its impact on people with disability, communicate business case for employing people with disabilities to the recruitment sector, provide specialised disability awareness training, and develop best practices.
- IX.** Launch national campaign on disability awareness and communications training to combat lack of knowledge and instigate culture change. Given reluctance/inexperience among many employers in recruiting people with disability, there needs to be a marketing campaign that presents the business case in employing people with disability as well as communicating that it is the right thing to do. Employers need to see and understand the bottom-line benefits of recruiting people with disability, including employer of choice positioning, retention, shifting demographics, increased use of technology, greater creativity, improved customer service, and reputation and brand. In addition, there is also marketing/training needed to support both employers and employees in initiating and handling conversations around disclosure of disability. There should also be consideration of custom approaches for people with disability in communications strategy.
- X.** As part of its submission in response to the review of the current DES model, Northcott also made the following recommendations with regards to service delivery:
- Increase participant choice and control of services providing it is moderated so that transfers cannot be used to avoid or delay activity tests.
 - Require first meeting between participant and provider to be face to face with more flexible arrangements beyond this initial meeting.
 - Provide better information for participants about providers e.g. detailed summary of provider services, their long term history and specialisation. In addition, Northcott conditionally supports online participant testimonials provided they are carefully and continually moderated.
 - Make fewer changes to provider market to reduce volatility combined with a system of quality assurance to ensure that small providers are not undermined.
 - Amend eligibility criteria for students with disability so that they can elect to participate in employment in their final years of school.
 - Revise 'job in jeopardy' processes and language to better reflect that it is rarely about job jeopardy but about providing support at key times.
 - Change focus of employer campaigns to demand side engagement where employers are encouraged and educated to realise it is a good business decision to employ a person with disability rather than just promoting it as a 'nice' idea.
 - Allow providers to be able to choose the level of employment services they provide.

Education

Many children with disability access the mainstream education system, which is their right as citizens. However, teachers and mainstream learning environments are often ill-equipped and/or under-resourced to meet their educational needs appropriately.

A. Current Insights

1. More than 1 in 10 children in NSW public schools has a disability

According to the NSW Department of Education 2015 Annual Report, more than 90,000 students enrolled in NSW public schools receive additional support or adjustments for learning because of disability, equivalent to 12% of all students. While significant gains have been made in terms of available funding for students with disability, funding levels are still not adequate to meet their educational needs appropriately.

2. Early intervention classes in NSW public school system offered to a tiny share of students

The number of students attending kindergarten at government-affiliated primary schools was just below 70,000 in 2015 while early intervention classes covered 710 students in the same year, a share close to 1%.⁹

3. Rising share of education complaints to Australian Human Rights Commission for disability-related complaints

Although employment-related complaints accounted for the largest share of total complaints under the DDA, education, while accounting for just 11% of complaints, was one of the fastest growing areas of DDA complaints (nationally), climbing by 49% in the space of 4 years (2012/13 – 2015/16), demonstrate that education for people with disability is becoming a larger issue.¹⁰

4. Aboriginal and Torres Strait Islander children aged 0-14 years are more than twice as likely as non-Indigenous children to have a disability, reducing educational attainment

In 2012, Aboriginal and Torres Strait Islander (ATSI) children aged 0-14 years were more than twice as likely as non-Indigenous children to have a disability (15% compared with 7%). While the overall disability rates for male and female Australians identifying as ATSI were not significantly different (25% and 22% respectively), there is a clear gender divide among those aged 0-14. The disability rate for ATSI boys aged 0-14 years (22%) was 2.5 times as high as the comparable rate for girls (9%).¹¹

⁹ Number of Full-time and Part-time Students by State, Australian Bureau of Statistics, 2015

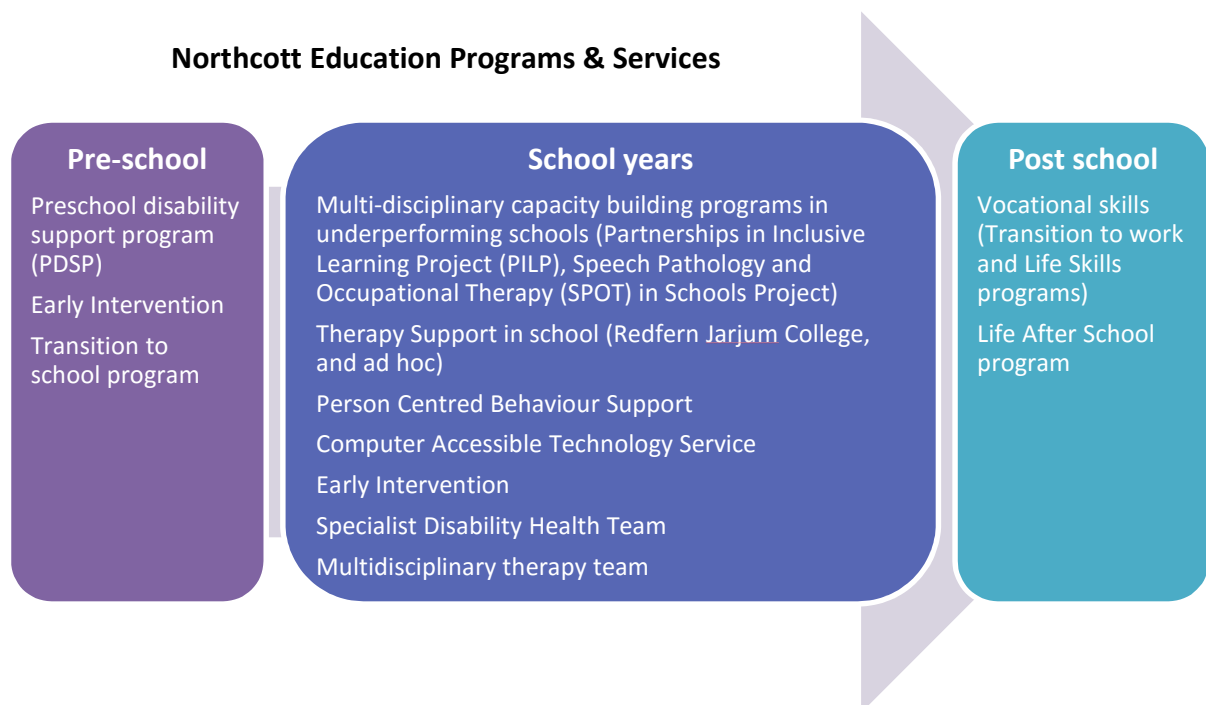
¹⁰ Annual Report, Australian Human Rights Commission, 2012/13 & 2015/16

¹¹ Survey of Disability, Ageing and Carers (SDAC), Australian Bureau of Statistics, 2012

In an education context, Aboriginal children on average score lower than their non-Aboriginal counterparts in reading and numeracy. By Year 9, 74% of Aboriginal children scored at or above national minimum standards in NAPLAN reading tests and 80% scored at or above national minimum standards in NAPLAN numeracy tests, in contrast to non-Aboriginal children who scored 94% and 96%, respectively.¹²

B. Northcott Experience

Northcott provides a range of Education services to support people with disability from pre-school all the way through to post-school (see chart below). In all services, Northcott is the service provider, with the exception of the Preschool Disability Support Program, where it acts as program administrator on behalf of the NSW Department of Education.



As part of the NSW Inquiry into the provision of education to students with a disability in government and non-government schools, Northcott provided a response documenting the key issues along with recommendations. As many of those issues and recommendations still have application in a national context, please see below in brief the key issues facing students with disability. Northcott’s full response to the inquiry is attached as Appendix B.

1. Access to professionals for timely diagnosis is an ongoing and urgent need, particularly in regional areas

An inability to access relevant qualified health professionals can delay diagnosis and access to essential supports. A formal diagnosis is essential before children and their families can access

¹² National Assessment Program: Language & Numeracy, National Report, 2016

necessary supports in the education system. An early diagnosis means that a child with disability or special needs can be supported to have positive learning experiences, particularly in the early years which can substantially impact their educational attainment in later years.

Northcott has experienced these issues in our role as administrator of the NSW Department of Education funded Preschool Disability Support Program (PDSP). This program supports children with disability or additional needs in NSW community preschools. Regional community preschools frequently advise that due to the insufficient or delayed access to relevant health professionals for a formal diagnosis, children with disability or special needs are unable to access the PDSP funding to support the child's early education needs, which can in turn lead to exclusion and/or greater financial burdens on families.

2. Restricted availability or access allowed to allied health professionals

Even after diagnosis, there are often further delays in obtaining therapy services caused by limited availability and/or access to allied health professionals. Some schools have 'closed door' policies that do not support a child's access to therapy within the school environment even though this is essential for the child's access to education and their ongoing educational needs. In many outer metropolitan and regional areas there are insufficient therapy services in local areas. This means that young children and their families have to travel long distances to access therapy services at a major centre, which can lead to extended absences from school.

3. Teacher confidence in supporting children with additional needs is low, particularly in outer metropolitan and regional areas

Northcott has recently delivered, in collaboration with the Hunter and Went West Health Services and local schools, two school-based therapy services programs. As part of this initiative, Northcott worked with teachers to determine their confidence to support children with additional needs before and after the collaboration. Prior to the initiative beginning, the results of this initial assessment pointed to low confidence among teachers. Some teachers spoke about the growing number of children who need additional educational support, with 'many more children coming into school with speech difficulties,' meaning they were always looking 'for more ways to help the kids'.

4. Limited support available for Indigenous children with disability

Northcott has gained first-hand experience of those issues facing Indigenous children with disability through its work with Redfern Jarjum College, a unique school that mentors, educates and assists local Aboriginal and Torres Strait Islander children who are failing at, or not attending, school.

Indigenous Australians also face significant barriers to accessing disability support services, partly a result of insufficient services in metropolitan and regional areas, social marginalisation,

cultural attitudes towards disability and culturally inappropriate services, which can often affect ability to reach educational outcomes such as literacy.

5. Education system is often punitive and not educative for children with disability

The education system is frequently experienced as punitive as opposed to educative for many students with disability with limited provision or supports to implement positive behaviour support. Northcott's experience working with students and families is that the approach to restrictive practices involving restraint, including physical, mechanical, chemical or seclusion, remains unchanged, with many schools still unable or unwilling to practice positive behavioural support strategies. Northcott offers individual support to parents with school aged children, and has supported parent complaints about the unacceptable use of restrictive practices on their children in school environments.

In addition to the comments Northcott made in the submission, in its role as administrator of the PDSP, Northcott is also acutely aware of the below issue:

6. Rising numbers of children applying for Preschool Disability Support Program (PDSP) funding but pool of funding remains unchanged

In Northcott's role of administrator of the PDSP, which supports children with disability in NSW community preschools, applications have increased from year to year but funding pool of money remains the same, indicating rising demand in the face of funding constraints. For example, from calendar year 2015 to calendar year 2016, there was an 8% increase in applications, showing not population growth but increased awareness among the sector. Those children with disability have always been there but government funding is currently based on current awareness of the program and does not anticipate demand that may arise from children who have previously been unaware of the PDSP program.

C. Recommendations

In response to the issues identified, and backed up by publicly available data as well as the lived experiences of the clients that Northcott supports, it is recommended that the Disability Discrimination Commissioner considers the following measures:

- I. Lobby commonwealth and state government to invest more in employing health and allied health professionals in regional areas.
- II. Expand use of quarterly school health clinics, such as the Specialist Disability Health Team (SDHT) that is currently funded and delivered through NSW Health and the Department of Family and Community Services. This team is a combination of health and allied health professionals who visit regional schools on a quarterly basis. The teams are able to provide timely advice to both parents and teachers with opportunities to follow up each quarter.

- III. Increase use of collaborative school based-therapy services programs in areas of acute professional shortages. For example, Northcott has delivered the Speech Pathology and Occupational Therapy (SPOT) program in 15 Western Sydney schools in collaboration with the schools and WentWest, the local area health service. The program was developed in response to acute shortages of speech pathology and occupational therapy in Western Sydney schools.
- IV. Scale-up 'in-school programs'. In-school programs are where therapy is delivered either as a regular 'roadshow' or with dedicated school therapists. 'In-school' therapy programs provide improved access for outer metropolitan and regional schools. A demonstration of the success of this model is whether Northcott is working in collaboration with Redfern Jarjum College to provide therapy supports to work towards reintegration of the children back into mainstream schools. This collaboration is achieving outstanding results for the children with some in 2016 achieving NAPLAN results for the first time.
- V. Prioritise and implement National Framework for Reducing and Eliminating Restrictive Practices in the Disability Services sector, which aims to contribute to the promotion and full realisation of all human rights for people with disability. The implementation of the framework will also help to reduce a punitive approach in favour of focusing on the educational needs of children with disability or special needs. Already the implementation of positive behavioural support strategies have been very successful across the disability services sector and they are substantially reducing the frequency and severity of restrictive practices.

Housing

A. Current Insights

1. Lack of accessible/affordable housing for people with disabilities & limited capacity in Specialist Disability Accommodation (SDA)

SDA pricing will apply to approximately 28,000 NDIS participants or 6% of people with disability eligible for NDIS by full roll out of the scheme (based on original Productivity Commission estimate). According to NDS, the current national supply is 14,000, with national growth estimated at 500 units per year increasing to 900 in 2019 and falling below 500 in 2022. With supply meeting only half of demand, the need to increase accessible and affordable housing for people with disability remains urgent.

2. Still many young people with disability in residential aged care (RAC) housing facilities despite commonwealth and state funding made available for their transfer into specialised accommodation

In 2006, the Council of Australian Governments allocated \$244 million to a Young Persons in Residential Aged Care (YPIRAC) national initiative, with an initial focus on people under the age of 50 and a secondary focus on those aged 50 to 64. However, as of December 2016, there were still 2,222 people under the age of 65 in residential aged care in NSW and 193 of these are under the age of 50.¹³ Nationally, in 2014 (latest figures available) there were 7,194 people under the age of 65 living in residential aged care and 1,618 of these are under the age of 50.

B. Northcott Experience

Northcott operates a range of accommodation models across NSW, including in-home and community supports as well as housing and supported independent living for people with disability. In-home and community supports aims to support people with disability requiring assistance to live independently in the community, with drop-in support provided in the individual's own home or in the community. Currently, Northcott supports approximately 60 customers across 9 locations, with varying types of disability including intellectual, physical, acquired brain injury and mental health.

1. Lack of accessible/affordable housing for people with disabilities & limited capacity in Specialist Disability Accommodation (SDA)

From Northcott's perspective, there are a number of clients who want to move to accommodation that better fits their needs and lifestyle, such as in-home accommodation support but can't due to lack of alternative accommodation options. This issue is even more pronounced for those requiring 24 hour care, impacting both choice and flexibility in participant's self-determination (see Case Studies below).

2. No collaboration in vacancy management system

Northcott accommodation services reports that the dissolution of the centralised vacancy management system, which in NSW was previously hosted by FACs pre-NDIS, meaning that new clients now have to contact multiple service providers to see which organisations have capacity to deliver housing services. In an environment of extremely limited housing supply, this creates additional burdens on participants and prevents the marketplace for housing for people with disability from functioning efficiently. There are currently no plans in place to enable collaboration between accommodation service providers.

3. Young people with disability placed in Residential Aged Care (RAC) housing facilities does not meet their support needs

¹³ Australian Government, Department of Social Services, December 2016.

As part of the national Younger People in Residential Aged Care (YPIRAC) initiative, as outlined above, Northcott received funding from ADHC to purpose build accommodation at three sites in NSW. In early 2016, Northcott conducted a qualitative evaluation at the three sites to find out the current quality of life, social participation and social inclusion. A majority of residents recalled their time in RAC as being mentally and physically detrimental.

C. Case Study

1. Case Study 1

Billy is a 57 year old client of Northcott who has spinal-cord injury. He uses a power wheelchair to get around in the house and community. He moved to Northcott's Transitional Accommodation service from hospital to learn independent living skills as his goal was to move into an accommodation set-up where he has his own kitchen and bedroom with staff support so that he can live as independently as possible. He has been residing with Northcott-operated Transitional Accommodation service since November 2001.*

Although the nature of this service is a short term accommodation program, Billy has been unable to find alternative accommodation which meets his needs. He has applied for social housing in Frenchs Forest area to live close to his family to get regular support but he is still on the waiting list for suitable accommodation.

Billy requires a high level of support. Prior to NDIS, Billy received daily support via a home care agency. The hours he received in funding were not enough to meet his support needs (Billy's staff could only pop in at certain times and he spent quite a lot of time in bed) and he was not eligible for supported accommodation with FACS as he does not have an intellectual disability.

Billy's mum lives in Manly and it takes her 45 – 90 minutes to travel to Ryde. Billy has tried to explain this situation to Housing and has been informed that there is a long waiting list in the area he applied for accessible housing. Billy has been waiting for suitable housing for 16 years, as there is a long waiting list for accessible housing in Northern suburbs.

Billy said 'I have been through a lot of stress to find a house near my family which never happened. My mum only visits me once a week as it is too far for her to come to my place. All of my medical and health supports are in the Northern suburbs so I have to travel a lot to attend appointments'.

**The client's name has been anonymised for the purposes of this submission.*

2. Case Study 2

Sarah is a 32 year old female who has Spina Bifida, a physical disability. Sarah is due to receive a power wheelchair to get around within the community. Sarah has been a client of Northcott's Transitional Accommodation Services, a housing program that provides accessible and affordable housing for people who have disability, for a period of 6-24 months. This program provides support to help individuals identify skills gaps and work on improving their ability to live as independently as possible. Sarah's goal is to learn skills to live independently in her own home with limited support.*

Sarah has been residing at Merrylands accommodation service since January 2016. Sarah has shown that she is capable of living independently, with appropriate supports in place. She advised that she has been

on the Social housing waiting list since May 2016 and has been informed that the waiting list for Sydney city area is long and she will have to wait for ten years.

Sarah's parents, friends and family lives in city suburbs and she has all of her medical support in that area. Sarah works 3 days a week in supported employment service in the city so despite her disability she has to travel long distances to and from work. Sarah advised that it is very hard for her to travel long distances to meet her friends and family, meaning most of the time she is not able to make it or has to cancel. In addition, Sarah also finds it increasingly difficult to attend her medical appointments given the issues of traveling to city as well as them being at different times.

From Sarah's perspective, the only barrier to a move is the availability of appropriate housing. As a result, Sarah has requested Housing Pathways to consider her application as a priority.

**The client's name has been anonymised for the purposes of this submission.*

D. Recommendations

In response to the issues identified, and backed up by publicly available data as well as the lived experiences of the clients that Northcott supports, it is recommended that the Disability Discrimination Commissioner considers the following measures:

1. Seek commitment from government to increase supply of accessible and affordable housing for people with disabilities. NDIS will increase the numbers of people with disability eligible for housing but supply does not yet meet demand. Government should also consider the use of additional financial incentives for bringing more private developers on board. Communications strategy also needs to deliver the business case for including people with disability to the real estate sector.
2. Lobby NDIA to take lead on standardised approach to vacancy management or develop frameworks to allow collaboration among organisations. With the vacancy management system existing under FACs in NSW now obsolete, NDIA should consider developing standardised approach to vacancy management or consider setting guidance for sector as a whole as to how best to work together to address vacancy management.
3. Ensure YPIRAC targets of moving all young people in residential care into specialised accommodation are met. As mentioned previously, as of 2016, there still more than 2,000 people under the age of 65 in RAC in NSW and nearly 200 of these are under the age of 50. NDIS needs to make this move a priority and accelerate the transition. Not only is there a human rights argument with Northcott YPIRAC accommodation clients with disability moving into specialised accommodation settings reporting a much better quality of life and improved social inclusion and participation outcomes, there is also an economic and social one. There are savings to government (reduced hospital and allied health costs), reduced lost productivity, community living and support, reduced need for home/community support services and compensation savings due to a safer environment.

Contact details

Should you require any clarifications or further information on this submission, please contact Ruth Callaghan, General Manager Stakeholder Relations on 02 9890 0153 or email ruth.callaghan@northcott.com.au. Alternatively, please contact David Harper on 0450 848 558 or by email at david.harper@northcott.com.au.

Sources

- Australian Bureau of Statistics
- Australian Human Rights Commission
- Department of Social Services, Australian Government
- Housing, National Disability Services
- National Assessment Program: Language & Numeracy Annual Report
- NSW Public Sector Commission
- Productivity Commission

**Appendix A: Submission on the Discussion Paper on New Disability
Employment Services**

Appendix B: Northcott Submission for NSW Inquiry into Education