



Action for More Independence & Dignity in Accommodation

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Advocacy, Self Advocacy, Rights, Accessibility, & Community Living for People with a Disability

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NDIA

SDA Housing Policy

RE: Specialist Disability Accommodation position Paper on Draft Pricing and Payments.

AMIDA provided feedback with regard to the SDA Pricing and Payments Framework. We are pleased to also make comment on the Position Paper.

We take on board that you are seeking feedback to finalise an intended approach and have some quite specific suggested improvements which we believe are completely within the intended approach and the NDIA Act, in particular to promote the provision of high quality and innovative supports that enable people with disability to maximize independent lifestyles and full inclusion within the community.

We specifically wish to focus on 2.6 Building types and 2.9.6 Non-conforming legacy accommodation.

We are very pleased to see an explicit limitation of 5 on the maximum number of residents in the pricing model and an Agency view that larger models than this are not optimal for long term participant outcomes and limit opportunities for inclusion. We are likewise pleased there is an expectation that existing larger models will be phased out over time.

We are concerned however that congregation and segregation of people with a disability is not explicitly limited also. The current wording can be interpreted as allowing for clusters of units including of 5 bedroom houses which could be co-located. Where developments such as this have occurred for example Plenty Residential Services in Victoria, Community Visitors report that they operate in institutional ways and prevent choice, control, participant outcomes and community inclusion. Even smaller clusters of independent units have the unintended

consequence of congregation and segregation and the negative outcomes that follow.

We believe this section of the discussion paper can be improved to remove this interpretation by reference to a requirement that properties be dispersed within community accommodation and not segregated on one site. This could be included in 2.6 in reference to building types and that they are not expected to be segregated and congregated on one site and also in 2.9.6

With regard to large residential centres and larger accommodation in existence already we are encouraged by the stated expectation that these will be phased out over time. However we are concerned that without a requirement that an actual phase out plan be developed, resident outcomes will remain poor for far too long. We suggest that as well as being considered on a case by case basis in consultation with state governments, that plans for phase out are a stated requirement for SDA funding where existing accommodation is non-conforming.

With regard to the separation of funding for accommodation and support we are very pleased with this approach as we agree this is the best way to ensure choice and control for participants in the Scheme. There has been a long standing unmet demand for SDA and we are hopeful the approach taken will lead to the needed growth of innovative accessible quality accommodation. This will need to be monitored.

There has already been some action by families of participants in the scheme to fill the need by building accommodation themselves and renting to small groups of friends who are also participants. In effect they have built their own groups homes and are outside the registered provider pool. We have a concern that if only registered providers and buildings can attract the SDA funding those families who have attempted to create solutions will be unable to get the ongoing funding required to cover the extras they may need such as fire sprinklers, assistive technology, furnishings and the added maintenance that may result due to complex behaviors. We believe more work will be required to ensure these options do not languish and that the quality and safeguards those living in registered accommodation have are available to those who have developed home grown alternatives, perhaps through an auspicing arrangement with registered SDA providers.

Thank you for the opportunity to comment on the Position paper. We would appreciate receiving a final copy of the paper.

Regards,

Pauline Williams

Housing Rights Co-ordinator

AMIDA