**Submission**WA NDIS Information, Linkages, Capacity Building Commissioning Framework

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**People With Disabilities WA (PWdWA)**

Since 1981 PWdWA has been the peak disability consumer organisation representing the rights, needs, and equity of all Western Australians with a physical, intellectual, neurological, psychosocial, or sensory disability via individual and systemic advocacy. We provide access to information, and independent individual and systemic advocacy with a focus on those who are most vulnerable.

PWdWA is run by and for people with disabilities and aims to empower the voices of all people with disabilities in Western Australia.

**Developmental Disability WA (DDWA)**

Developmental Disability WA is an advocacy agency representing families, organisations and individuals concerned with the rights and needs of people with intellectual and other developmental disabilities. DDWA provides a coordinated and united voice advocating for the rights of people with disabilities and for the provision of the opportunities, support and services they and their families require.

**Introduction**

People with Disabilities WA and Developmental Disability WA thanks the Disability Services Commission for requesting feedback from peak advocacy groups representing those people directly affected by the services and supports likely to be offered under this part of the NDIS. Our organisations made written submissions to the ILC National Policy Framework and Commissioning Framework, and PWdWA Executive Director was involved as an expert in a two day workshop on measuring outcomes from the ILC Framework. The end result of the National Policy and Commissioning Framework was very good from our perspective and there is little we would consider needs changing from that work. Our submission highlights changes we hop will be considered in the grants process to ensure that organisation run by and for people with disability, their families and carers are prioritised.

**Issues**

As DSC and the state government are no doubt aware, there are inherent risks of inequity where there may be major differences between state and federal schemes, as well as potential benefits with a more locallised model. The alignment of key guiding approaches, including legislation, policies, frameworks and standards to national approaches as much as possible is therefore essential to reduce inequity.

The WA NDIS draft Commissioning Framework’s adoption of national scheme Objectives, Outcomes and Focus Areas for Investment are supported by us. We also value a commitment to ensure that the costs of the Local Coordinator role in the NDIS will be separate to funding for the delivery of ILC initiatives, as it is within the federal scheme. In particular we think it would be useful to use the same diagram as on page 11 of the NDIA ILC Commissioning framework to clearly show that the same objectives and outcomes are the basis for ILC in WA.

There are however aspects of the draft framework which we believe need changing.

**1. Align and clarify grant eligibility and assessment criteria**

There are a number of eligibility and assessment criteria in the national ILC Commissioning Framework which we think needs to be part of the WA NDIS ILC commissioning framework.

* evidence of need,
* prioritising activities that assist people who do not have an NDIS plan and
* prioritising activities that assist families and carers.
* balancing the number of activities directed at individuals with those directed at the community
* effective and fair spread of funding across the activity areas
* Equity- coverage in every region and a range of activities to meet needs
* Evidence of a contemporary, positive and progressive approach to inclusion (meaningful participation rather than simply presence in the community)
* Evidence of local or community support and connections into the community
* A mix of big, medium and small organisations
* A diversity of activities
* More user-led organisations

The feedback of many organisations during the original consultation was focused on the need to ensure that user led organisations, particularly organisations that are run by and for people with disabilities are prioritised for all activity areas. This is something which is certainly not seen in the current WA NDIS expression of interest which occurred. The reason this is important is that there will be individual and group capacity building when organisations of people with disability are being supported to build the capacity of other individuals, as well as building the capacity of the community. It also clearly shows that people with disabilities, their families and carers are those with expertise of their own lives and expertise in what will make a difference to their access and inclusion in community, when building the capacity of communities.

The importance of more user-led organisations, sufficient supports for people who do not have a NDIS plan, and for family and carer supports, were raised as important considerations for ILC at the Perth consultative workshop on the draft NDIS ILC Commissioning Framework.

The most recent process of the expression of interest on activities which were labelled as ILC activities provides an example of where changes could be made. At this stage it is unclear how many of the organisations funded are organisations that are by and for people with disabilities, or family members and carers, however we know that a number of service provider organisations were successful. Although the tender process did allow for conflict of interest or bias to be identified, it did not recognise the inherent conflict of interest when there is an organisation that provides direct services also providing access to information about the scheme or process to access funding for services. There needs to be a clearer policy guideline on this issue as it relates to the core principles behind the NDIS and shift in power through ‘choice and control’ to people with disabilitiy, and where appropriate their families and carers.

We are also aware that feedback was given from the expression of interest process on elements of applications such as the ability to evaluate programs which small user led organisations are less likely to be able to have knowledge of, or gain expertise writing grant applications about. The extra criteria above tries to address that issue of small localised groups with expertise from the people who need support, being able to access ILC grants. This issue of smaller local groups, or mid size represemtative organisations competing with large service organisations was raised very strongly within the National ILC consultations. The National ILC program has a toolkit and other resources to assist those groups.

Criteria based on evidence of contemporary practice and need are also important to break the cycle of the same large organisations doing the same solutions. Ideally with ILC having a focus on those who are not necessarily eligible for the NDIS, and building the capacity of the community, then partnerships and innovations that could occur between people with disabilities, their families and carers and mainstream community organisations would be best placed to have a broader impact. The broader outcomes will not be met by the same disability service providers that are providing funded supports also providing capacity building for individuals and communities.

There needs to be the ability in the commissioning framework for small organisations and community groups to be encouraged to work together, and potentially asked and supported to come together, rather than only using those large organisations with supposed capacity. The grant making process should be iterative and be building capacity of groups run by and for peope with disability, their families and carers.

**2. Clarify the ILC Commissioning Framework’s Interface with Block Funded Programs**

The draft Framework states that “ILC funding is not intended to deliver activities that have been historically block funded by the Commission (p.6). However, it is acknowledged that there are a number of organisations currently deliver initiatives that may fit within ILC activity streams and focus areas.” (p.6) The draft framework does not specifically exclude advocacy or policy advice from what can be funded under ILC. The National framework **does** specifically exclude advocacy. Although advocacy has elements of individual capacity building it should not be funded through the ILC but should remain separate. We consider this to be important for both individual advocacy and systemic advocacy.

Although systemic advocacy may build the capacity of individuals and community in the way it is done, it is not the core purpose of systemic advocacy to build capability and opportunity. Rather it is the role of systemic advocacy to be a critical voice, a representative voice, and a voice for change in systems where needed. We believe ILC focused projects would compliment systemic advocacy activities, and could provide more effective outcomes in areas of community capacity building, but that systemic advocacy should be funded separately.

We are concerned also that there is no clear identification of how other state based funding options will be connected to for needed services and supports that do not fit into either NDIS or ILC streams. People with disability who do not meet NDIS elegibility for individual packages may still need support that comes from health, education, housing and corrective services to name a few. ILC commissioning needs to recognise interface and collaboration issues and there must be more sustainable funding arrangements for community-based services. Individual and systemic advocacy is one of these categories of services where ongoing operational funding remains essential. We therefore recommend further supporting information is provided to stakeholders around which supports for people not eligible for NDIS will be supported to sustain operations in future.

**3. Outcomes, Monitoring and Evaluation**

People with disability, their families and carers atre looking for participation, transparency and accountability of funded programs that aim to meet their needs. The Framework and ILC in WA needs more information on how the impact of ILC activities will be measured, communicated and used to inform future funding to support the sustainability of effective initiatives and identify and address unmet needs. We recommend that regular consultation processes are built into the commissioning cycle to support people with disability, their families, carers and representative organisationsd to provide feedback on what programs work, the approaches that are valued and the areas of need which are a priority. We recommend that there is a co-design process to work on the detail of ILC evaluation and engagement.

**4. Representative Participation in Commissioning**

People with disability, their families, carers and representatives bring unique expertise through their own lived experience and through connection with and representation of their peers. We recommend that grant assessment processes include robust participation by representatives across all focus areas and activities, and support inclusion of groups traditionally under-represented in disability policy, commissioning and governance (such as Aboriginal, CALD and mental health representatives).

**Conclusion**

We trust this feedback is useful and will be given serious consideration when reframing the document. As stated we believe that it is essential that there is a focus on building the capacity of groups and organisations run by and for people with disability, their families and carers so that they can be the ones delivering ILC activities. This is the opportunity for the Commission to model and act in alignment with the core NDIS principles, and the objectives of the ILC.

PWdWA and DDWA are happy to be contacted to provide further information and participate as representative organisations in co-design where resourced.