



**PEOPLE WITH DISABILITY
AUSTRALIA**

**A voice
of our
own**

General Supports

PWDA Submission on Foundational Supports

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Copyright Information

Submission on Foundational Supports - General Supports

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About PWDA

People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

We have a vision of a socially just, accessible and inclusive community in which the contribution, potential and diversity of people with disability are not only recognised and respected but also celebrated.

PWDA was established in 1981, during the International Year of Disabled Persons.

We are a peak, non-profit, non-government organisation that represents the interests of people with all kinds of disability.

We also represent people with disability at the United Nations, particularly in relation to the United Nations Convention on the Rights of Persons with Disabilities (CRPD).

Our work is grounded in a human rights framework that recognises the CRPD and related mechanisms as fundamental tools for advancing the rights of people with disability.

PWDA is a member of Disabled People's Organisations Australia (DPO Australia), along with the First People's Disability Network, National Ethnic Disability Alliance, and Women with Disabilities Australia.

DPOs collectively form a disability rights movement that places people with disability at the centre of decision-making in all aspects of our lives.

The work of PWDA embraces the 'Nothing About Us, Without Us' motto of the international disability community and Disabled Peoples' International, the international organisation representing national organisations of people with disability in over 130 countries.



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Approaching Foundational Supports

PWDA believes that in order to be successful and applicable to people with disability, General Supports need to be developed in a way that involves genuine and ongoing codesign and leadership by people with disability, at all stages of the consultation and development process. These supports must be developed and implemented in such a way that demonstrates Australia's commitment to compliance with the Convention on the Rights of Persons with Disabilities (CRPD), recognising the real barriers we face in enacting and fully promoting the rights of all Australians with disability.

1. Genuine Co-design is crucial

PWDA upholds the development of all Foundational Supports must be disability led and reflect a genuine commitment to codesign. Supports must be developed alongside and through the guidance of people with disability and their representative organisations as foremost representatives and experts on the needs, wants and preferences of people with disability.

To ensure our submission effectively reflects the insights, experiences and needs of people with disability across Australia, PWDA held member forums and surveyed the wider community. These showed that people with disability expect our community, in particular those whose lived experience is directly impacted to take key leadership and decision-making roles throughout the co-design, development and implementation process for all Foundational Supports. PWDA's Deputy CEO Megan Spindler-Smith articulated during these forums, "PWDA is a disabled people's organisation, and this means the leadership expertise, the perspectives and the experiences of people with disability, is at the heart of everything we do". This statement encapsulates PWDA's expectation for Government to centre the voices and expertise of the disability community, reinforcing the need for Disability Representative Organisations (DRO's) and people with disability to be directly involved throughout the consultation process and beyond, to ensure that Foundational Supports meet the needs and preferences of all people with disability equitably throughout Australia.

Recommendation 1- The co-design, development and implementation of Foundational Supports must actively include an ongoing commitment for leadership in co-design by people with disability and their representative organisations.

2. Further clarity is needed on Foundational Supports

A key concern of PWDA surrounds the lack of clarity and definition regarding what Foundational Support's include. Through our survey on Foundational Supports, 75.23% of respondents stated that they did not have a clear understanding of what the term 'Foundational Supports' means. With many not having clarity on who the supports were for, what they would include, or how they differ from existing NDIS supports. However, a significant number of respondents believe that General Supports should include supports that facilitate full social and community participation.

“General Supports SHOULD mean any support provided by a care worker or organisation, including personal cares, social participation, transport and community integration activities. Not however, supports/ therapies provided by trained healthcare professionals such as physiotherapists, speech pathologists or psychologists.”

“I don't understand what it is all about. Why hasn't Australian Government Department of Social Services (DSS) tried to contact me/my household to inform me? Where is the media coverage of this; seen nothing on TV?”

PWDA feels that further clarity and community education is needed to ensure the disability community has a clearer and more comprehensive understanding of the scope, roles, purpose and an overall definition of General Supports, and Foundational Supports more broadly. We strongly advocate that the way Foundational Supports are designed and defined must be determined and developed in co-design and direct collaboration with people with disability and their representative organisations. Furthermore, all services should emphasise a disability and person-centred approach that acknowledges the diverse and intersectional lived experiences and support needs of people with disability throughout Australia.

Recommendation 2- Collaboratively led community education on the scope, roles and purpose of General Foundational Supports is needed to facilitate greater comprehension and understanding of these supports for the disability community.

Recommendation 3- All definitions and service design of General Foundational Supports must be co-designed and co-produced with people with disability and their representative organisations.

Implementing Foundational Supports

1. Accessibility of services and supports within Foundational Supports

There must be recognition of marginalised and disadvantaged cohorts

Through PWDA's engagement on Foundational Supports there were specific calls for disability centric and inclusive services that cater to diverse needs, particularly multiply marginalised cohorts including First Nations, LGBTQIA+, CaLD, as well as regionally and remote located people of all age groups with disability. It is recognised that these cohorts face additional barriers to accessing support and that the supports that currently exist are not equitable in terms of access, with many regions having little to no supports available.

"There are limited supports, or culturally appropriate supports, for people who are from culturally and linguistically diverse communities, or from multicultural communities... finding someone who was able to work with [my mother] in a way that is empowering has been really difficult, and I think referral services need to engage more with a lot of different communities, but also, I guess, with multicultural and non-English speaking communities as well."

In addition to services that are well informed and resourced from a cultural perspective, there is a need for supports that meet the needs of specific disability type groups within the disability community, such as neurodivergent specific supports and for all supports to be guided by trauma informed care and best practice.

Some practical elements of culturally appropriate supports that members suggested included, but were not limited to, multilingual supports, community led services that integrate local knowledge and expertise, supports that are face to face rather than only technologically mediated, supports that are tailored to the needs of specific communities and demographics, support providers that are trained in cultural nuances and who can help people with disability navigate Foundational Supports from a culturally informed perspective with services that are person-centred and disability-led.

Recommendation 4- PWDA calls for Foundational Supports to be developed to directly meet the needs of multiply marginalised cohorts including First Nations, LGBTQIA+ and CaLD communities, with a strong focus on the regional and remote support gap and the needs of all age groups with disability. Supports must be culturally inclusive and trauma-informed, with equitable access across all states and territories.

Accessibility means acknowledging the diverse nature of disability.

PWDA urges the Department of Social Services (DSS), the Federal Government and State and Territory Governments to recognise and acknowledge that the disability community in Australia is a diverse cohort with diverse needs and priorities. It is essential that Foundational Supports are flexible, accessible and appropriate for people with diverse needs, backgrounds and age groups.

As the cross-disability DPO for all Australians with disability, PWDA reinforces and upholds the sentiment expressed by our members that the disability community is highly heterogenous, meaning that all people with disability have different and diverse needs and preferences. As one member articulated;

“If you’ve met one person with autism, you haven’t met them all. If you’ve met one person with hearing loss, you haven’t met them all. [People with disability] all have different needs. We all have different aspects of our lives that might need supports”.

To ensure that people with disability can access services and supports that meet their needs it is crucial that supports are flexible enough to provide targeted priority cohorts meaningful and accessible options. Moreover, as another member expressed.

“Often people with disabilities have more than one disability. You know, even though they say disability, some may have physical as well as intellectual”

This important reflection emphasises the fact that Foundational Supports must not be one-size-fits-all in approach, but rather they must be flexible in addressing the diverse and often complex requirements of people with disability with supports tailored to meet their diverse and intersecting support needs. Moreover, Foundational Supports must be designed in a way that ensures all people with disability to access services and supports in a way that best suits their needs for life and social engagement safely.

Recommendation 5– Governments must provision for tailoring of Foundational Supports to meet the diverse, interacting and often overlapping needs of people with disability, resisting a one-size-fits-all or individual disability type only approach. PWDA believes this is best achieved through active collaboration and leadership by people with disability and their representative organisations.

Information must be presented in accessible formats

Through PWDA’s engagement, concerns about the accessibility of information and supports being provided currently and that these shortcomings will continue to be reflected in Foundational Supports. PWDA feels strongly that in order to appropriately recognise and respond to the diverse needs and lived experiences of people with disability, information supports must be provided through multiple accessible formats. This includes, but not limited to, Easy Read versions of all documentation and tools, AUSLAN interpreters and live captions at events, consultations and information/learning sessions, and accessible documents/digital tools that can support the use of diverse screen reader types. Our members also emphasised that information should be provided in multiple locations and formats.

“Not all [people] use the internet. We need local information”

Recommendation 6- Information services and supports within General Foundational Supports must be provided in a range of accessible and inclusive formats that support the diverse accessibility needs of Australians with disability, that recognises the different locations and ways people with disability access information and supports.

The need for nationally consistency

People with Disability Australia (PWDA) expresses significant concerns about the risks associated with the state and territory-led implementation and maintenance of Foundational Supports. In particular, we are concerned that, without nationally consistent standards and requirements for service provision and access, some people with disability may continue to be left behind.

At the time of this submission, the Australian Government has not been able to clearly articulate the roles and capacities of state and territory governments in the development, implementation, and maintenance of Foundational Supports. Furthermore, as raised above the lack of clarity regarding the definition or scope of what Foundational Supports includes creates clear gaps that may drive inaction by States and Territories.

PWDA believes it is critical for the government to acknowledge the risk of inequity in both the accessibility and provision of Foundational Supports across states and territories. We urge the development of a nationally consistent and streamlined approach that directly addresses the disability community's concerns around equity, ensuring that people with disability are not subjected to a "location lottery." This approach should guarantee equal access to services, regardless of geographic location.

Recommendation 7- The Australian Federal, State, and Territory governments must work directly with people with disability and their representative organisations (state or territory peaks as well as national peaks) to develop and implement a nationally led, streamlined approach to Foundational Supports. This approach should require/regulate the need for consistency, equity, and access for all people with disability, effectively addressing the risks of a "location lottery" in service provision.

Recommendation 8- Clear rules regarding eligibility for accessing Foundational Supports, along with a well-defined, reduced threshold scope of what these supports encompass, are essential to avoid confusion, inequity, and unnecessary bureaucratic barriers. This will ensure that all people with disability can have their support needs met, either through Foundational Supports or by accessing services and supports within the NDIS.

2. Improving existing (and future) disability supports within Foundational Supports

Services need to be easier to navigate.

“Most carer-based services, and most services that people with disabilities and their family’s approach, have to go around in the merry go round trying to find exactly what they need at this point. And neither the NDIA website is accessible for people with vision impairment with too much information or even like things like the care gateway can be difficult to access because you do not know what the what, sort of format websites in.”

Feedback through PWDA’s member surveys and forums consistently demonstrated that current disability supports through the NDIS or in communities are inaccessible for people with disability. PWDA members said that they often struggle with unnecessary, intrusive barriers surrounding information and supports and feel the current systems are not tailored to identify and respond to individual needs appropriately. Many felt that the current systems and processes were inaccessible for them, expressing concerns that this approach will continue to exist within Foundational Supports.

“I don’t think there should be a wrong door. I don’t think there should be a you cannot enter here. Or if you’ve done this for x amount of time, you’ve used it all up, sorry, you can’t go anymore... it needs to be what the person, really what they think they need and to be respectful of that. That’s independence. That’s choice.”

Several respondents highlighted the need for inclusive services and supports that were person-centred and readily accessible. With a strong no-wrong door approach, so that even if you are not sure how to access services and supports, that they are not siloed or rendered inaccessible to people with disability because of excessive bureaucratic and administrative barriers.

Recommendation 9- PWDA advocates that a “no-wrong door” approach is taken. With all government agency staff and service providers, receiving comprehensive and compulsory disability affirming and led training on disability rights, relevant eligibility

criteria, and the range and scope of supports available to ensure that staff and providers have a thorough understanding of how the system is interacted with and can provide accurate and accessible information to people with disability.

Recommendation 10- PWDA advocates that all government agency staff providing generalised information or supports must be trained in person-centred and trauma informed practice to meet the diverse needs of the disability community.

Recommendation 11- General supports must be designed to empower and resource advocacy and representative organisations to assist participants in navigating the system and to identify misinformation and gaps within government services and respond to systemic issues as they arise.

Current systems contain fragmented, confusing and inconsistent information

“I consistently get incorrect information from the NDIA. It's as if they genuinely don't understand the rules they operate under, or they hope I don't understand them. Their wrong advice is disadvantaging me and interfering with my ability to use my plan.”

Many people with disability, including one of our members above, expressed frustration with how challenging and inconsistent current disability services and government agencies are to navigate, expressing concerns that this bureaucratic and impersonal approach to supports, and information services, would continue within General Supports.

Moreover, many reported feeling overwhelmed by the number of websites and resources currently on offer, often containing outdated, inconsistent or irrelevant information, due to there being a lack of centralised and reliable sources of information.

“[General Supports] should be an information service, not just another national website full of dead links and useless information that leads people with disabilities and families round in a giant circle of hunting for information, being referred to places that can never help you and stuff that is never there.”

Our engagement demonstrated a clear expectation and desire to see more people with disability significantly and directly involved in developing accessible approaches to service provision and

"If it's not designed by us, it's not informed by us, it's just another tricky government way of trying to silo things and make it nice and tidy for a government form".

Recommendation 12- PWDA advocates that information, and services are provided in a way that is truly accessible, person-centred, flexible, consistent and inclusive. With independent and disability led review, development, and design of services by people with disability and their representative organisations.

Discontinuing the use of jargonistic and inconsistent language

"The biggest issue with all of these platforms, and even in the community led ones, is the usage jargon"

Concerns have been raised about the term "capacity building" being used differently in foundational supports compared to the NDIS context and have called for plain, simplified and consistent language/meaning usage across different government systems and departments including consistency in usage between the provision of the NDIS and Foundational Supports. Moreover, this inconsistent usage of language is particularly inaccessible to groups including, but not limited to, people from Culturally Diverse backgrounds, those with intellectual disability and neurodivergent individuals.

Recommendation 13- PWDA strongly advocates for the use of consistent, accessible and simplified language/meaning across government services and departments, including NDIS and Foundational Supports. Language usage must avoid ableist and unnecessary jargon and consider the needs of all marginalized groups of people with disability.

Ensuring supports meet needs regardless of location or background

An area of undeniable concern for PWDA members, as reflected in recent survey data, was surrounding the equitable access of services and supports for the disability community throughout Australia. 92.79% of survey respondents were sceptical or expressed concerns regarding whether Foundational Supports will be equally

accessible to people with disability regardless of a person's location or background. This response reflects members fears, as expressed throughout member forums and surveys conducted by PWDA that disparities will exist based on geographical locations, such as regional, rural and remote areas, where there are already significant gaps and a lack of appropriate services and supports in many parts of Australia.

PWDA believes that there is urgent need for all governments to focus on strategies that will ensure equitable access to Foundational Supports across all regions and demographics to build trust and confidence in the Foundational Supports system. PWDA members expressed concerns that regional and remote areas would be particularly disadvantaged, and that issues with the Foundational Supports were vulnerable to the same access issues currently seen within the NDIS, with members articulating that.

“people in regional and rural areas are already disadvantaged in accessing disability support, so I imagine this would continue to be an issue.”

“these things never are equally accessible because of the prejudices in our society and systems against people of colour... and those from low socioeconomic backgrounds.”

Additional concerns that members specified included inequities due to existing and ongoing shortages of qualified service providers including support workers and health professionals, the potential for gatekeeping (akin to the barriers currently experienced with the National Disability Insurance Scheme (NDIS)) and potential financial barriers that prevent or limit people with disability's access to services and supports. PWDA's members consistently reinforces that without co-design and targeted strategies, Foundational Supports will not be accessible to all people with disability in Australia.

Access to information for many people with disability is through formal and informal networks, this includes children and young people with disability. A significant part of General Supports involves the provision of information, peer supports, and advocacy, and the current proposed legislation banning social media for young people under the age of 16 will isolate this group from essential platforms for information and reduce their social connectedness. This is especially critical for young people with disability who are unable to engage with their communities through 'traditional' or face-to-face

interactions due to the nature and limitations of their disability. Creating genuine risks of disempowerment and isolation.

Provision of information solely via parents and caregivers is not an equitable or safeguarding focused solution. Undermining the autonomy, safety and choice of young people in making decisions about their own support needs. Additionally, it must be acknowledged that for some young people they are primary carers for their parents or adult family members. Restricting access to information via a social media ban will undermine their capacity to provide informed and empowered support to their family.

Recommendation 14– All levels of government need to focus on strategies that will ensure equitable access to Foundational Supports, including through social media, across all regions and demographics to build trust and confidence in the Foundational Supports system. Ensuring that other legislation is not brought in that inherently impacts specific and vulnerable cohorts of people with disability.

Recommendation 15– Governments must utilise co-design and targeted strategies to build trust and confidence in the Foundational Supports System.

Recommendation 16- PWDA feels there is an urgent need for all levels of government to focus on strategies that ensure equitable access across different regions and demographics if they are to build trust and confidence in the Foundational Supports system.

3. What should General Supports look like?

In order to be successful there are certain features and approaches that must be included. These points are by no means exhaustive, but rather they reflect a starting point that will help ensure that Foundational Supports successfully respond to a diverse cohort of people with disability from varied and intersectional backgrounds and communities. The following is a summary of the key components of General Supports that PWDA has identified as crucial to their success.

- **Information, referral, and advice services:** Our members emphasised the need for accessible, culturally appropriate, and peer-run support groups. There

were calls for better advocacy and more consistent, accurate information from all government departments, including the NDIA.

- **Addressing gaps in existing services:** PWDA members highlighted issues with accessing services, inconsistent eligibility criteria, and a lack of support for people with multiple disabilities or complex needs.
- **Accessibility preferences:** There is a strong preference for flexible access choice with a high level of expectation for in-person support, peer-run groups, and the importance of understanding the difference between capability and capacity.
- **Tailored supports:** Focusing on the need for culturally and linguistically diverse services, specific supports for people with psychosocial disabilities, and person-led approaches.
- **Capacity building:** People with disability have stressed the importance of regular check-ins, proactive support, and the potential role of community and/or navigation officers in providing local assistance.
- **Local and Relevant:** General Supports will work best when taking into consideration local concerns and services available and stressed the importance of equitable access to services and information regardless of location, background or the nature of a person's disability.

Defining and understanding 'Capacity Building'

Within PWDA Member Forums concerns were raised about the term "capacity building" being used differently in foundational supports compared to the NDIS context. In particular some members felt that General Supports as currently presented by the DSS inappropriately puts the onus on disabled people to advocate for themselves.

"Even when you have the ability to self-advocate, it doesn't mean that you have the capacity to self-advocate. You. And it doesn't mean that you have ... the capacity to self-advocate alone." Several PWDA Members emphasised that having the ability to self-advocate doesn't always mean having the capacity to do so, especially alone. As

such, they stressed the importance of addressing systemic issues rather than just individual advocacy.

In particular members discussed the importance of supports that help people understand and assert their rights, as well as become more independent and stressed the importance of informal networks and community-based supports in building capacity, acknowledging that these networks and supports emphasis local knowledge and face-to-face support in ways that members have found beneficial when they were able to access such services in the past. Several members highlighted the importance of supports that help people from diverse social and cultural backgrounds such as CaLD, LGBTQIA+ and First Nations people, are key to building capacity within the community.

Some members made suggestions for using technology to connect people in regional and remote areas to capacity building supports and expertise but emphasised the importance of ongoing, refresher training for new technologies and systems. Many members called for peer-run support groups and better training and support for advocacy in order to build their capacity. Vitally though, PWDA members highlighted that the nature and impact of disability can change over time, meaning that individual capacity can also fluctuate. Any supports surrounding 'capacity building' requiring ongoing support and review to acknowledge the fluctuating nature of many disabilities and the changing capacity of people with disability over time.

Several PWDA members highlighted the role of disability representative and advocacy organisations in providing valuable capacity building support, helping people understand their conditions and navigate support systems

Recommendation 17- PWDA calls for a consistent definition and usage of the term capacity building across government systems and programs including Foundational Supports and the NDIS/NDIA.

Recommendation 18- The development and implementation of General Supports needs to value local communities and informal supports and acknowledge fully the broad range of social and cultural backgrounds that Australians with disability are part of, and how these communities can support capacity building.

The importance of Supported Decision-Making

Article 12 of the CRPD sets out the right for people with disability to make their own decisions, and to receive support to make decisions where needed.

Unfortunately, in Australia, substitute decision-making regimes still exist, where a guardian or financial administrator is appointed for a person with disability and given the power to make decisions for people with disability. Some people with disability choose to appoint someone to make decisions for us. However, when a person is appointed and the person with disability has no say, a lot of room is left for abuse. Regimes of substitute decision-making originate from ableist attitudes, that view people with disability as incapable of knowing what we really want.

We must shift this view and start respecting and supporting people with disability to make their own decisions. Governments must allow people with disability to make their own decisions. The Government must provide people with disability with support to make decisions, where necessary. Supported decision-making measures must respect and follow the will and preference of the person with disability.

If all support options have been exhausted and it is not possible to determine the will and preferences of a person with disability, a representative decision-maker may be appointed. The representative must make decisions based on the 'best interpretation' of the person with disability's will and preference.

If it is still not possible to determine the person's will and preference, the representative should then make a decision with reference to the person's human rights.

Recommendation 19- Foundational Supports should have embedded within its framework a nationally consistent approach to supported decision-making framework that upholds Article 12 of the CRPD and is consistent across all the states and territories.

The need for peer-led services and supports

Many PWDA members expressed a strong preference for services and supports that are designed and delivered by peers in the disability, across a range of disability

backgrounds, who can relate directly to the lived experiences of people with disability within specific cohorts.

“I think peer-led community development would work in our space, where people with disabilities are paid to do it, but we’re the ones leading us... The framework needs to say, actually, this is an opportunity for disabled people to captain those groups and conversations.”

PWDA endorses peer-led, and disability led practice as integral to the success of Foundational Supports. We emphasise the imperative of proper compensation of people with disability in this process and feel that involvement of people with disability in development and leadership roles at all levels is in line with the goal of enhancing opportunities for full engagement and community participation for people with disabilities.

Recommendation 20– Foundational Supports should be developed in close consultation with people with disability and their representatives and should emphasise supports that privilege a peer-led and disability-led approach

Recommendation 21– Any disability-led and peer-led practices within Foundational Supports must appropriately compensate people with disability for their skills and services in an equal capacity to other service providers.

4. The need to rebuild trust – concerns about Foundational Supports

PWDA members have frequently expressed concerns that Foundational Supports are a cost-cutting measure disguised as a beneficial initiative. This makes it highly evident that there is a need for the Government at all levels to rebuild trust with the disability community by demonstrating a genuine commitment to co-design and ensuring the leadership of people with disability. With us and our representatives at the centre of the definition, planning and delivery of Foundational Supports.

Additionally, many PWDA members noted concerns that Foundational Supports would be disjointed and inaccessible, particularly in regional and remote areas, which would likely lead to fragmented services, challenges for people with disability in navigating

the Foundational Supports ecosystem and an inability of Foundational Supports to address individual needs and respond to people with complex or multiple disabilities who are not eligible for the NDIS.

Additional sentiments from members featured widespread concerns that Foundational Supports will be poorly executed, concerns that funding at both a federal and state and territory level will be inadequate to meet the support needs of Australians with disability and ongoing concerns about the current and future impacts of Foundational Supports on current and potentially future NDIS participants.

Recommendation- 22 Federal and State and Territory Governments need to establish and maintain nationally consistent and equitable approaches to developing and implementing Foundational Supports that acknowledge the diverse cultural and geographical landscape across Australia

Recommendation- 23 Governments at all levels need to reestablish the trust of people with disability by listening and responding to their concerns and by having people with disability and their representative organisations play a central and ongoing role in the development and implementation of Foundational Supports.

Clear and well-defined guidelines, with limited barriers for eligibility must be provided for Foundational Supports access process. It is already acknowledged that the current processes linked with accessing disability supports create confusion and bureaucratic barriers that prevent us from receiving support needed. Establishing clear low barrier eligibility criteria linked with the scope of Foundational Supports will ensure that people with disability are not left behind or forced to navigate complex inaccessible systems. This clarity will allow individuals to access either Foundational Supports or NDIS services based on their specific needs, without unnecessary obstacles.

Recommendation 24- PWDA feels it is imperative that no changes are made to NDIS participants plans or funding until Foundational Supports are fully implemented nationally.

Recommendation 25- Clear, low barrier and well-defined guidelines for eligibility and Foundational Supports scope is essential, reducing confusion, bureaucratic hurdles, and inequities.

5. Consultation Concerns

Through PWDA's member surveys it has become apparent that consultation and information about General Foundational Supports has been inadequate according to the majority of our members. 84.54% of respondents lacked confidence or did not feel they had adequate information about Foundational Supports and only 3.64% of respondents felt very confident they had adequate information. In addition to this, 71.56% of respondents did not feel that there has been adequate opportunity for consultation regarding General Supports. For people who chose to respond with an alternative response to the question, "Do you feel that the DSS has provided appropriate opportunities for people such as yourself to participate in consultation for general supports?" (11.01% of respondents) the majority of respondents expressed concern at the lack of consultation or communication and a lack of accessibility during DSS consultations. Many PWDA members have expressed frustration surrounding the consultation process and lack of engagement of people with disability.

PWDA expresses concerns that DSS consultations have been inadequate both in volume and locations, with many regional and metropolitan people with disability and their carers and families unable to attend in person consultations due to location or inaccessibility of the venues chosen. Additionally, we hold concerns that there has been a lack of appropriate times for consultation which properly acknowledges the variable availability and capacity of many people with disability, particularly those with carer, parenting and/or employment commitments. Moreover, online consultation sessions have quickly sold out, indicating that demand far exceeds the capacity of the DSS to provide adequate consultation opportunities for General Supports as well as a relatively short time span of consultation that makes the process inaccessible for many Australians with disability and their families and carers.

PWDA has considerable concern that Disability Representative Organisations (DRO's) and advocates of people with disability have struggled to access consultations due to caps on participation and disappointment that DRO's, as key representative organisations for people with disability, have not been consulted and included in consultations more closely, whilst for-profit providers have had multiple opportunities to guide and contribute to the consultation process for General Supports.

During PWDA member forums and surveys many participants asserted that the input of DRO's and Advocacy organisations was an important form of advocacy for the disability community.

"One of the things that I think is has actually got worse under the current government is they defunded a whole bunch of disability advocacy organisations at the at the end of the last financial year, and frankly, we need more, not less."

Recommendation 26– People with disability must be consulted, and engaged in designing the policies and processes that will impact on them as the foremost experts and beneficiaries within the development of Foundational Supports.

Recommendation 27– Disability Representative Organisations and advocates must be centrally involved and consulted with, alongside and on behalf of people with disability, throughout all development and implementation of Foundational Supports including both General Supports and Targeted Supports.

Impact and Systemic Considerations

1. Reduction of Impacts During Implementation

PWDA stresses the importance of developing Foundational Supports through comprehensive co-design and co-development with people with disability and their representative organisations. This process must carefully balance the need for rapid implementation with the necessity of conducting pilots, trialing disability centric approaches and refining service provision prior to full national rollout.

It is particularly critical that the government ensures no one is excluded from their current supports, including those on the NDIS, prior to full accessible implementation of Foundational Supports. Any changes to access to current supports must only occur when these supports are implemented fully nationwide, meeting a consistent set of national standards. This approach safeguards people with disability from experiencing risky gaps in receiving essential support prior to and during the transition period.

Recommendation 28- The government must commit to maintaining current NDIS supports access until Foundational Supports are fully developed, trailed, and

implemented consistently across all jurisdictions, confirmed by a nationally consistent set of standards evaluated by people with disability as effective. Therefore, any unsupported transition linked with the legislative changes to NDIS must be deferred to reduce direct quality and safety risks for people with disability.

2. Maintaining the integrity and essence of the NDIS

PWDA welcomes the expansion of accessible supports for people with disability through Foundational Supports. With provisions that ensure that all people with disability have their support needs identified and addressed, we firmly believe that certain critical services—such as one-on-one supports, respite, and assistive technology— must not be actively removed from the NDIS. These supports are essential to maintaining the dignity and human rights of individuals with disability, particularly those with higher and more complex support needs. Maintaining these services within the NDIS framework is crucial to upholding the core principles of choice, control, and autonomy that the NDIS was designed to promote. Foundational supports must not be implemented with the consequence of diluting access for those within the scheme, thereby impacting the rights of people with disability to live independent and fulfilling lives.

PWDA strongly asserts the necessity of maintaining critical supports for NDIS participants in order to preserve the quality and integrity of services within the NDIS framework. Removing critical supports from those who are NDIS participants, could result in less accessible, personalised supports that have limited, but necessary quality and safeguards, ultimately reducing the availability of high-quality services for those with complex, high-need supports. Maintaining these supports will ensure they remain focused, specialised, and tailored to meet the unique needs of people with diverse and complex disabilities, safeguarding them from the potential risks of poorly monitored, nationally inconsistent standards within Foundational Supports. Foundational supports must not act as primarily a cost-cutting measure, that is unable to uphold the safety and standards of care that people with disability deserve.

Maintaining this as the primary focus for the diverse needs of people with disability will ensure access to the full range of supports they require, whether through Foundational

Supports or NDIS services. Ensuring a more consistent and inclusive system for all Australians with disability.

Recommendation 29- Critical services currently provided and maintained through the NDIS to ensure the dignity, human rights, and autonomy of people with disability. This will preserve the core NDIS principles of choice, control, and independence, and prevent dilution of service quality.

Recommendation 30- Implementation of Foundational Supports must not replace or reduce services currently provided by the NDIS. Ensuring that current NDIS participants continue to receive the high-quality, person-centred services they require.



**PEOPLE WITH DISABILITY
AUSTRALIA**

People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

For individual advocacy support contact PWDA between 9 am and 5 pm (AEST/AEDT) Monday to Friday via phone (toll free) on **1800 843 929** or via email at pwd@pwd.org.au

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