



Children and Young People
with Disability Australia

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Disability, Carers Policy and Access Branch
Department of Social Services
TUGGERANONG ACT 2900

**RE: DESIGNING THE NEW INTEGRATED CARER SUPPORT SERVICE – A DRAFT SERVICE CONCEPT FOR
THE DELIVERY OF INTERVENTIONS TO IMPROVE OUTCOMES FOR CARERS**

Children and Young People with Disability Australia (CYDA) welcomes the opportunity to provide feedback regarding the *Draft Service Concept for the Delivery of Interventions to Improve Outcomes for Carers*.

CYDA is the national representative organisation for children and young people with disability aged 0 to 25 years. The organisation is primarily funded through the Department of Social Services and is a not for profit organisation.

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

All children have the right to be cared for by family, except in circumstances where this is not in the child's best interests.¹ This right is articulated in the United Nations *Convention on the Rights of the Child* (CRC) and the *Convention on the Rights of Persons with Disabilities* (CRPD).² Article 27 of the CRC obliges States Parties to "take appropriate measures to assist parents and others responsible for the child" to ensure that every child has a "standard of living adequate for the child's physical, mental, spiritual, moral and social development."³

Article 23 of the CRPD states requires States Parties to "ensure that children with disabilities have equal rights with respect to family life. With a view to realizing these rights, and to prevent concealment, abandonment, neglect and segregation of children with disabilities, States Parties shall undertake to provide early and comprehensive information, services and support to children with disabilities and their families."⁴ As a signatory to both conventions, Australia has clear obligations to ensure that services and supports provided for families of children with disability are grounded in this human rights framework.

¹ United Nations General Assembly 1989, *Convention on the Rights of the Child*, article 9.

² United Nations General Assembly 1989, *Convention on the Rights of the Child*, articles 7, 9, United Nations General Assembly 2006, *Convention on the Rights of Persons with Disabilities*, articles 6, 23.

³ United Nations General Assembly 1989, *Convention on the Rights of the Child*, article 27.

⁴ United Nations General Assembly 2006, *Convention on the Rights of Persons with Disabilities*, article 23.

The draft Service Concept includes families of children with disability in the definition of 'carer' used.⁵ While CYDA understands that some families identify as 'carers' and may wish to access services through the new *Integrated Carer Support Service*, CYDA has significant concerns about the inclusion of this cohort.

All families engage in unpaid care of their children, however the term 'carer' is typically only applied in this context in relation to children disability. In these cases, children with disability are defined primarily by their care needs, rather than being seen as a child first.

Inclusion of families of children with disability within the category of 'carers' reinforces a siloed model of service provision, rather than inclusion within mainstream children and family services. Despite the shift towards inclusive service provision in recent times, children with disability and their families frequently experience exclusion and segregation in a range of life areas. This was recognised as a key factor that increases the disadvantage and marginalisation of people with disability in the *National Disability Strategy 2010-2020*.⁶ The Strategy states that "a key imperative is for the broader community and mainstream services and facilities that are part of ordinary Australian life to be available and fully accessible for people with disability."⁷ CYDA is concerned that targeting services to families of children and young people with disability through the *Integrated Carer Support Service* does not reflect this intention.

It is therefore the view of CYDA that mainstream children and family services should be inclusive of the support needs of children with disability and their families. Critical to the progression of an inclusive community is instilling understanding and expertise about disability within mainstream services and the broader community. This includes the majority areas of service provision identified in the *Draft Service Concept*, including awareness, information provision, intake and education. Consideration will therefore need to be given to how this can occur to ensure continuity of services and that current gaps in provision are addressed.

The development of the National Disability Insurance Scheme (NDIS) should provide further opportunities to support mainstream children and family services to meet the needs of children with disability and their families. The NDIS represents a significant shift from the previous model of providing block funding to disability services, to providing portable and individualised funding packages, with a focus on enabling people with disability to exercise choice and control in relation to supports received.⁸ In addition to providing individual funding to participants of the Scheme, the NDIS will also fund services through the *Information, Linkages and Capacity Building (ILC)* component.

ILC aims to provide funding for organisations, services and programs to increase the capacity of mainstream sectors to meet the needs of people with disability and adopt inclusive practice.⁹ The NDIS is not intended to fund services and supports that are provided through mainstream systems such as education, employment, health or child and family services.¹⁰ However, ILC funding will be

⁵ Australian Government Department of Social Services 2016, *Designing the New Integrated Carer Support Service – A Draft Service Concept for the Delivery of Interventions to Improve Outcomes for Carers*, Commonwealth of Australia, Canberra, p. 7.

⁶ Council of Australian Governments 2011, *National Disability Strategy 2010-2020*, Commonwealth of Australia, Canberra, p. 13.

⁷ Ibid, p. 13.

⁸ *National Disability Insurance Scheme Act 2013 (Cth)*, section 2(3).

⁹ National Disability Insurance Agency 2015, *A Framework for Information, Linkages and Capacity Building*, Geelong, p. 11.

¹⁰ *National Disability Insurance Scheme Act 2013 (Cth)*, section 34(f).

provided to support these sectors to meet their human rights obligations and provide appropriate services to people with disability. CYDA therefore recommends that ILC funding specifically targets children and family services so that children with disability and their families can access appropriate support in these mainstream sectors.

There also needs to be capacity to monitor and evaluate access to children and family services for children with disability and their families. Given the aim of the *National Disability Strategy* is to ensure people with disability can access mainstream services, CYDA supports specific focus on children and family services in work undertaken to implement the Strategy. This should include specific actions around children and family services. One option could also be ensuring that inclusion of children and young people with disability in mainstream sectors, including children and family services, is a standard agenda item in all national stakeholder meetings, particularly those coordinated through the *Council of Australian Governments*, such as the *Education Council*. This would ensure ongoing focus and measurement of progress on this issue.

Due to capacity constraints, CYDA has not been able to address the eight different areas of service provision included in the *Draft Service Concept*. CYDA would welcome the opportunity to meet with the Department to provide further feedback. It is also regrettable that CYDA was not invited to participate in related advisory groups and other consultation mechanisms regarding this initiative.

Thank you for the opportunity to contribute to this consultation.

Yours sincerely



Stephanie Gotlib
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