

4 November 2019

NDIS Consultations
Department of Social Services
GPO BOX 9820
Canberra ACT 2601
By Email: NDISConsultations@dss.gov.au



Dear Sir / Madam

SUBMISSION: Review of the NDIS Act and the new NDIS Participant Service Guarantee

Thank you for the opportunity to provide a submission on the review of the NDIS Act and the NDIS Participant Service Guarantee. The Queensland Alliance for Mental Health (QAMH) passionately advocates for a NDIS system that produces quality outcomes for all consumers. QAMH supports the submissions made by the **Queensland Disability Network**, and emphasises the importance of a grassroots responses to aid consumers in navigating the NDIS System.

The experience of service providers and consumers within the mental health sector has been disappointing. Like many representatives, QAMH is highlighting issues that have been raised in the past with the hope of change and reform to spur positive outcomes for the sector that we advocate on behalf of.

Reform is necessary to ensure that psychosocial pathways are adequately provided for and mapped. There are four key issues that must be addressed in order to achieve this:

1. A failure to meet targets

The Federal Government announced the intended target of 64,000 individuals to be transitioned through the NDIS psycho-social pathway in 2019. The target for this has been extended until 2020. This indicates that transition, and other in-community services, are likely to be providing services to several individuals with psychosocial disabilities. These services continue to be under-funded, with no clear support for transition to NDIS.

2. A failure to adequately transition

The extension money allocated to services that provide transition services is under-resourced and under-supported. This fails to account for the critical work that is done in this space—and that some consumers *choose* not to register for NDIS. Given the adversity and difficulty experienced for many consumers experiencing psychosocial disabilities (both in the NDIS process and from historical oppression or institutionalisation), this choice is understandable. Where the purpose of NDIS was to give autonomy and choice to persons with a disability, this should be supported at all steps of the pathway to NDIS support.

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07 3252 9411
admin@qamh.org.au
433 Logan Road
Stones Corner QLD 4120
www.qamh.org.au

Queensland Alliance for Mental Health Ltd

Where the targets for psychosocial disability pathways and the NDIS are not being met, this means transition services are bearing the burden of service provision for these individuals. The extension money granted for these services is inadequate, and more funding should be provided to support the transition to NDIS.

3. A failure to provide a workable pathway for complex needs

In 2018, the Federal Government announced their intention to develop a complex psychosocial disability pathway for individuals with acute and complex mental health presentations. This is supported by QAMH, as an informed approach to working with consumers with complex needs.

This Pathway is still not operational. Resultantly, consumers are being assessed through mainstream NDIS pathways which may not adequately assess (or provide for) complex psychosocial needs. To provide tailored services that truly respond to the needs of these consumers, the complex psychosocial pathway must be implemented as a priority.

4. A failure to provide competent workforce

The NDIS workforce continues to be under-resourced. Many assessors and planners lack the key capabilities to identify, and work with, individuals with psychosocial disabilities. This requires adequate training and skill to identify. Individuals continue to receive inadequate resources in their NDIS plans due to incorrect assessments by assessors not equipped to assess psychosocial disability presentations. The NDIS workforce must be adequately equipped to assess—and pathways for reviewing an assessment should not be so burdensome for consumers, where many reviews are on the basis of incorrect assessments.

Yours sincerely



Jacklyn Whybrow
Acting Chief Executive Officer

