



Wednesday 16 December, 2020

Commonwealth Department of Social Services  
[disabilityreform@dss.gov.au](mailto:disabilityreform@dss.gov.au)

To whom it may concern,

**Re: SDA Alliance submission in response to draft NDIS Outcomes Frameworks**

The Specialist Disability Accommodation (SDA) Alliance wishes to thank the Department of Social Services for preparing the Introductory Paper on *'Improving outcomes of people with disability under the National Disability Strategy and the National Disability Insurance Scheme'* and for the opportunity to make a submission. The SDA Alliance has prepared the attached brief initial submission.

The key features of this submission are:

- Option A – preferred recommendation to include in the Framework a 7<sup>th</sup> Domain: Home and Living
- Option B – alternative recommendation to embed and incorporate home and living aspects far more explicitly into each of the existing Domains
- Recommendation strengthening measures to track performance and progress in every Domain, such that there is specific reference in each to choice and control of people with disability

In making this submission, the SDA Alliance acknowledges the work undertaken by Social Ventures Australia (SVA) Consulting in developing a *Disability Housing Outcomes Framework* in partnership with the broader sector.

The SDA Alliance would warmly welcome further engagement, collaboration and discussion about this submission and opportunities to further develop the NDS & NDIS Outcomes Framework as a means to improving outcomes for people with a disability.

Yours faithfully,

**Melanie Southwell**  
CEO

Attached: SDA Alliance submission in response to DSS Introductory Paper on *'Improving outcomes of people with disability under the National Disability Strategy and the National Disability Insurance Scheme'*



## **SDA Alliance submission in response to DSS Introductory Paper - Improving outcomes of people with disability under the NDS and the NDIS**

### **Introduction**

This submission provides clear recommendations to DSS & the NDIA about improvements to the NDS & NDIS Outcomes Framework necessary to promote better outcomes for participants and promote system efficiencies.

### **About us**

The SDA Alliance (SDAA) brings together some of the nation's most committed Specialist Disability Accommodation (SDA) providers, investors and downstream market supports (including specialist SDA Support Coordinators, Allied Health professionals, online platform providers, builders, developers and architects). In doing so, the SDA Alliance provides a unified voice to better support development of a diverse and sustainable SDA market.

### **Current SDA Alliance Membership (including Members, Associates & Supporters):**

- Ability Housing
- Ablelink Pty Ltd
- Access Housing Australia Ltd
- Accesible Homes Australia Ltd
- ARC Health
- Common Equity NSW Ltd
- Community Housing Ltd
- Conscious Investment Management Pty Ltd
- Court Walters
- Disability Services Consulting Pty Ltd
- DPN Casa Capace Holding Pty Ltd
- EG Funds Management
- Greenlight Human Capital
- Housing Choices Australia Ltd
- Hume Community Housing Association Co Ltd
- Kirby Littley
- National Australia Bank
- Purposed Housing Australia Pty Ltd
- SDA Housing Australia Pty Ltd
- SDA Services
- Summer Housing Ltd
- Synergis Fund
- Thomas Daniel Butler
- Ability SDA Pty Ltd
- Access 2 Place Housing
- AccessAccom Pty Ltd
- Adaptive Housing
- Anand Group Homes
- Bank Australia Ltd
- Community Housing Canberra Ltd
- Design Develop Certify Group Pty Ltd
- Guardian Living Pty Ltd
- Good Housing
- Housing Hub
- Illowra Projects Pty Ltd
- Inspire Impact Pty Ltd
- Inclusive Housing Australia Pty Ltd
- Liveable Home Builders
- MC Two Pty Ltd
- Northcott Innovation Ltd
- Pa-Ra Cooperative Ltd
- Santorini Services Pty Ltd
- Sana Living
- SDACCOM Pty Ltd
- Spinal Cord Injuries Australia
- Synapse Australia Limited
- YoungCare Ltd



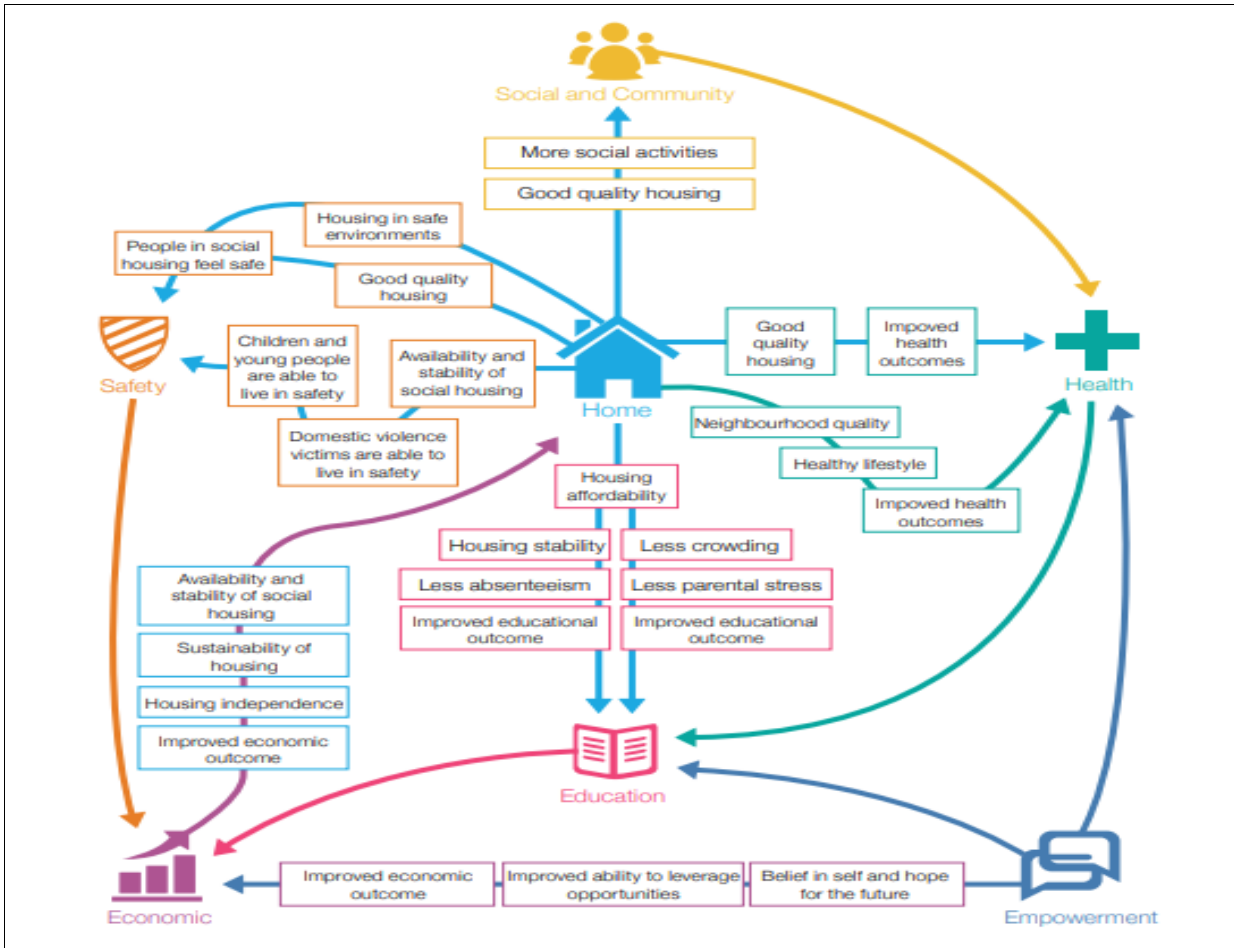
**Option A – Preferred Recommendation: Add 7<sup>th</sup> Domain ‘Home and Living’**

The SDA Alliance’s preferred recommendation is for the NDS & NDIS Outcomes Framework be expanded to include a 7<sup>th</sup> Domain:

- Home and Living

Housing is fundamental to the achievement of positive outcomes in almost every aspect of the lives of people with a disability. As such, Home and Living warrants specific inclusion in its own right as a stand-alone Domain. Housing either directly affects or substantially influences all outcomes for people with disability. As such, significant improvements to the overall effectiveness of the NDIS and other programs targeted to people with disability will not be achieved unless there is a clear focus on housing. A failure to recognise this as a unique element in the Framework risks undermining and eroding potential gains and also adding very significant ongoing cost.

The centrality of housing is now being recognised by governments across Australia and internationally. For example, in May 2016, the NSW Department of Family and Community Services produced a report on measuring outcomes. It placed housing at the center as a fundamental element necessary to achieving positive outcomes in a range of areas including health, safety, social and community, education and economic. An extract graphic from page 7 of that report is included below. Housing is equally important to people with disability.





Further work has been undertaken by Social Ventures Australia (SVA) Consulting in 2020 to specifically develop an outcomes framework for disability housing. In collaboration with industry (including the SDA Alliance and our Members), a disability housing outcomes framework, founded on further research and a strong evidence base has been developed. Important aspects of this work should be included in the NDS & NDIS Outcomes Framework.

The following example shows how a 7<sup>th</sup> Domain for Home and Living might be composed. It has been written incorporating key findings from the SVA Consulting project 'Disability Housing Outcomes Framework'.

## **Domain: Home and Living**

**Outcome:** People with disability have access to Home and Living arrangements in which they can exercised choice and control and that have been established to facilitate the achievement of goals and outcomes of the person with disability.

<b>Sub-Outcomes (person-centred)</b>	<b>Example Indicators</b>
I have Home and Living arrangements that:	
<ul style="list-style-type: none"><li>• promote my physical, mental and emotional health and allow me to access health services due to the location and features of my home</li></ul>	<ul style="list-style-type: none"><li>• Satisfaction with access to health services from home environment</li></ul>
<ul style="list-style-type: none"><li>• promote healthy relationships at home and facilitate my connection to the community</li></ul>	<ul style="list-style-type: none"><li>• Social visits with family / friends who are not living with them</li></ul>
<ul style="list-style-type: none"><li>• promote my control of daily living routines</li></ul>	<ul style="list-style-type: none"><li>• Satisfaction with care received at home</li><li>• Change in frequency of positive interactions</li><li>• Daily self-care (personal hygiene, eating and care) needs met</li></ul>
<ul style="list-style-type: none"><li>• promote choice and control in decisions about my life</li></ul>	<ul style="list-style-type: none"><li>• Level of control over the front door of the dwelling, who comes in or out, and when</li></ul>
<ul style="list-style-type: none"><li>• promote comfort in my home and ensures I am safe from physical and psychological harm</li></ul>	<ul style="list-style-type: none"><li>• Sense of comfort in my home</li></ul>
<ul style="list-style-type: none"><li>• Allow me to exercise my human rights and civic responsibilities, and have a valued role in the home and community</li></ul>	<ul style="list-style-type: none"><li>• Ability to gain and/or keep valued role(s) in the home and community akin to others of a similar age (e.g. employment, volunteering, student, business or community leader)</li></ul>



In pursuing outcomes under this 7<sup>th</sup> Domain: Home and Living, the SVAC Disability Housing Outcomes Framework identifies 8 key levers which key stakeholders, including housing and support providers, can utilise. These elements could also be easily incorporated into the new NDS & NDIS Outcomes Framework.

1. **Location** – Proximity of the home to services, work, family and friends
2. **Quality of home** – Durability of the home including workmanship and the materials
3. **Design & configuration** – The layout of the housing, style and accessibility features
4. **Safety** – Features or services that allow for comfort within the home and facilitate improved safety
5. **Stability** – Tenure of the house and change of staff and people with disability
6. **Relationships between residents and providers** – The relationships between residents and providers and between providers
7. **Tenancy matching** – Processes in place to pair people with disability to housing and other residents
8. **Support model** – Model of care including active supports and delivery

### **Option B – Alternative recommendation: significantly expanded reference to home and living throughout the framework**

As an alternative to Option A, the SDA Alliance recommends the frameworks include expanded references to home and living elements across all 6 Domains. This is because housing is absolutely fundamental to the achievement of positive outcomes in almost every aspect of the lives of people with disability.

Housing is a critical enabler of outcomes. As such, greater emphasis and expanded reference is necessary in all 6 Domains, including clear home and living related sub-outcomes and matched indicators.

Further work is needed to fully and properly develop and incorporate home and living elements across the proposed NDS & NDIS Outcomes Framework. The SDA Alliance welcomes further opportunity to help define and develop this in partnership with DSS and the NDIA.

The SDA Alliance strongly encourages DSS and the NDIA to consider and utilise the good work of the SVAC Disability Housing Outcomes Framework in its update and finalization of the NDS & NDIS Outcomes Framework.

### **Further recommendation: Strengthen focus on ‘Choice and Control’**

The SDA Alliance also recommends the NDS & NDIS Outcomes Framework place a greater emphasis on choice and control of people with disability within every domain. It is important that outcomes, indicators and measures are explicit in referring to choice and control as a fundamental principle of the NDIS. The ability to track and measure progress on this front is vitally important and will deliver tangible outcomes for NDIS Participants and all other people with disability, as well as promoting overall system efficiency.