



Department of Social sporting and other activities
NDIS Consultations, GPO Box 9820
CANBERRA ACT 2601

By email only to NDISConsultations@dss.gov.au

Submission to Consultation on draft lists of NDIS supports

Summary

We strongly advocate that specialised disability sporting activities run by reputable specialised disability sporting organisations which are designed to improve the physical and mental wellbeing and personal capacity of persons with disability be considered as NDIS Supports.

This can be achieved in two ways:

- a carve out from the 'day to day living costs' category for membership fees of reputable specialised disability sporting organisations; or
- the creation of an NDIS Support category specifically for specialised disability sporting activities run by reputable specialised disability sporting organisations. These activities are designed to improve the physical and mental wellbeing and/or personal capacity of persons with disability.

We advocate for this for four main reasons:

- we provide programs specifically designed to improve the physical and mental wellbeing and personal capacity of persons with disability. These, therefore, should be funded by the NDIS in the same way any other support is.
- we provide a service that is not available elsewhere; if not offered and financially accessible, our beneficiaries will not meaningfully engage in their communities, engage in physical activities or build their capacity.
- we believe the inclusion of the sporting and other activities our charity provides is consistent with the overall intention behind the NDIS Supports list.
- our service is value for money, effective and beneficial, saving the NDIS money.

QUEENSLAND POWERCHAIR FOOTBALL ASSOCIATION INC.
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1. We provide programs specifically designed to improve the physical and mental wellbeing of and personal capacity of persons with disability

Our charity is a registered charity that provides public benevolent relief specifically and only to people who are wheelchair users, many of whom have very limited physical capacity. We are not a lifestyle related activity, and nor are we a standard recreational sporting club. We are a specialist disability organisation whose purpose is to promote the physical and mental wellbeing of our participants. In our case, sport is simply the vehicle through which we provide physical exercise, create accessible social interactions, build resilience and team building skills which aid in future employability and building capacity, and establish a supportive community.

We draw your attention to the fact that powerchair football was invented, like other disability sports, for the purpose of improving the physical and mental wellbeing and personal capacity of wheelchair users who have no other alternatives.^[1] It is specifically tailored to persons with disability, particularly powerchair users, and we have considered in the development of the programs we run the benefits and outcomes they provide to our participants. We are more than a regular recreational sporting club who happens to allow people with disability to participate; our entire purpose is improving the lives of people with disability.

We refer you to recent research demonstrating the benefits of powerchair football for electric wheelchair users.^[2] We also note that a significant amount of research has been undertaken across the globe on how the sport and programs within it can be further modified or improved to enhance the benefits it gives participants and reduce adverse side effects.

We further draw your attention to the fact that our charity has been given special charity status (public benevolent institution) on the basis that we provide benevolent relief to people in need due to disability. Unless our charity actually did provide such benefits through our activities, that status ought not to have been granted to us, demonstrating the legitimacy of our activities.

Finally, to make clear the obvious, our activities are not general in nature, nor alternative or complementary therapies.

2. We provide a service that is not available elsewhere; if not offered and financially accessible, our beneficiaries will not meaningfully engage in their communities, engage in physical activities or build their capacity.

Our sporting and other activities are tailored specifically to benefit people with disabilities, promote their physical wellbeing and create an accessible and inclusive community for them. Our sporting and other activities are fundamentally designed around the capacity of our





beneficiaries, meaning they are unique and unavailable elsewhere. Further, our volunteers are trained to interact and plan activities for people with disabilities, unlike 'standard' clubs.

As discussed above, we are not simply a sporting organisation that caters for both able-bodied and disabled people. Our participants cannot access regular sports owing to their physical impairments. A person in a wheelchair, especially individuals with very limited movement, cannot join a regular recreational sporting club because they cannot play in regular recreational sport. This can be contrasted against an able-bodied NDIS participant who can play regular football alongside non disabled people. There are no sporting opportunities for people with severe physical disabilities outside of reputable specialised disability sporting organisations such as our charity.

For most of the participants in our activities, their primary physical and social activity is through our charity, owing to the level of impairment and isolation associated with their disabilities, and the significant barriers they face. Without our charity, and the current ability of participants to use NDIS funds to pay to participate in our activities, they would not be meaningful participants in the community, and have negative outcomes.

We also bring to your attention the fact that we get regular referrals to our charity due to the unique nature of what we provide, and have ongoing requests to expand into regional Queensland due to the lack of similar sporting and other activities in regional Queensland.

3. We believe the overall intention of the NDIS Supports lists fits our inclusion as an NDIS Support.

We note other categories that are fundable as NDIS Supports under the draft list. In particular we note the following:

- Our reading of the existing NDIS Supports list, although vague, contemplates the sporting and other activities that our charity provides being NDIS Supports. We say this for four reasons:
 - First, the “exercise physiology and personal well-being activities” category is broad;
 - Second, only “standard toys, balls, racquets, uniforms, membership costs and other costs associated with recreational sports” are excluded. The costs associated with participating in our activities are not standard.





- Third, for the reasons explained above, our charity is not a standard “recreational club” as our activities are designed to improve physical and mental wellbeing and personal capacity, meaning membership costs are not costs associated with “membership of a recreational club”.
- Fourth, we believe our sporting and other activities are “sporting and other activities delivered in a gym or recreational club related to the participant’s disability support needs.”

We submit and strongly advocate for the removal of any exception for membership or entry fees for charities like ours, because it is easier to lump fees together than charge individual fees for each activity, particularly because we rely on volunteer staff to do accounting and invoicing. Additionally, individual line item billing places more work and stress on NDIS participants and their plan managers, and increases the costs associated with managing a participant’s supports. Individual transactions also may attract more transaction fees.

Further, we additionally note:

- The inclusion of ‘specialist products used in competitive and non-competitive sports and other recreational pursuits’. Historically, participants of our charity have seen difficulty in obtaining equipment under the NDIS because the equipment was seen as being for a ‘competitive’ sport, notwithstanding our charity’s charitable purpose and the goal of powerchair football to promote health and build capacity. This change is of course welcomed, and importantly shows that there is a place for a carve out for our category as the intention of the new NDIS Support list is to enable participants to participate in activities beneficial to their health and which improve their capacity.
- That health and well-being is a strong theme in the NDIS Supports list. We are an organisation tailored around providing health and well-being benefits to people with disabilities as evidenced above.

4. Our service is value for money, effective and beneficial, saving the NDIS money.

Our organisation is value for money, effective and beneficial. We are not spruiking alternative or complementary therapies which have been declared as not NDIS Supports. Our charity is run by volunteers and relies mostly on the goodwill of others; we save the NDIS money by providing benefits to NDIS participants at significantly reduced costs.





Recommendation:

We strongly advocate that specialised disability sporting activities run by reputable specialised disability sporting organisations which are designed to improve the physical and mental wellbeing and personal capacity of persons with disability be considered as NDIS Supports.

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Your faithfully,

QPFA Board

(We note that the QPFA Board includes several individuals who are NDIS participants and have complex disabilities requiring the use of a powerchair.)

[1] This point is discussed below.

[2] M Jeffress and W Brown, 'Opportunities and Benefits for Powerchair Users Through Power Soccer' (2017) *Adaptive Physical Activity Quarterly* 34(3) 235. See also R Wessel, J Wentz and L Markle, 'Power Soccer: Experiences of Students Using Power Wheelchairs in a Collegiate Athletic Club' (2011) *Journal of Postsecondary Education and Disability* 24(2) 147.

