

ILC Commissioning Framework - written feedback form

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Preamble

Local Government NSW (LGNSW) is the peak body for councils in NSW, representing all 152 NSW general-purpose councils and associate members including 12 special-purpose county councils and the NSW Aboriginal Land Council. LGNSW facilitates the development of an effective community-based system of local government in NSW.

LGNSW is pleased to provide feedback on the Draft Information, Linkages and Capacity-Building (ILC) Commissioning Framework, using the template provided.

Background

The Information, Linkages and Capacity-Building (ILC) stage follows the trialling and rolling out of the National Disability Insurance Scheme's individualised funded packages. The purpose of ILC is to provide basic information and referral advice for people with disability, their families and carers, build community awareness of disability issues and grow the capacity of individual people with disability and the mainstream services to support inclusion.

The National Disability Insurance Agency (NDIA) is currently accepting feedback to inform the draft ILC Commissioning Framework. The framework will put the ILC Policy into action.

The National Disability Insurance Scheme (NDIS)

The NDIS is a new way of providing support to people with disability across Australia. The NDIS will provide long-term care and support, but not income to recipients. The income needs of Australians with disability will be met through other means, including the Commonwealth's income support system. The NDIS will be managed by a new Commonwealth body, the National Disability Insurance Agency (NDIA). NDIS has 3 tiers of support.

Tier 1 – building community awareness of disability issues

Tier 2 – basic information and referral advice for people with a disability, their families and carers

Tier 3 – development and funding of an individual support plan for eligible people with a disability with “reasonable and necessary” supports.

Information, Linkages and Capacity-Building (ILC)

At the recent ILC consultation in Sydney, the NDIA simplified NDIS into two parts, combining Tiers 1 and 2 above into ILC:

1. Individual NDIS plans (also known as individually funded packages or Tier 3) - for eligible people

2. Information, Linkages and Capacity Building activities (also known as ILC or Tiers 1 and 2) – for all people with disability, their families and carers.

The ILC Policy Framework outlines the following five kinds of activities:

1. Information, linkages and referrals
2. Capacity building of mainstream services
3. Community awareness and capacity building
4. Individual capacity building
5. Local Area Coordination

The ILC Commissioning Framework is currently in draft, with the final version due to be released in June 2016.

LGNSW appreciates the opportunity to provide feedback on the ILC Commissioning Framework and our responses to the questions posed are attached. However in summary, the key areas of concern for LGNSW are:

- The ILC function needs to build on local government's knowledge to ensure that local communities are able to be as inclusive as possible;
- The broad ILC outcomes need to be changed into more specific, practical outcomes;
- The performance measurement of outcomes needs to be simple, easy and flexible;
- The ILC system needs to be fair, consistent and flexible for people with disability who miss out on the NDIS individual-funded packages;
- The ILC system needs to recognise the specific requirements of rural and remote areas;
- ILC funding is significantly lower than the funding for NDIS individual funded packages;
- Local Area Coordinators (LAC) is the only activity that will receive block funding, absorbing most of the funding under ILC;
- The anticipated community demand on the LAC's role will be on planning, with little time left for capacity building in communities;
- The other ILC activities will have to go through a competitive grants process; and
- The grants process will be challenging for smaller service providers including councils; for councils at risk of losing their Aged and Disability Officers who are experienced in capacity building; for councils at risk of losing their information and advocacy services; and for inadequate provisions for important objectives such as growing social capitals (ie. volunteers).

If you have any questions or would like further information, please contact Dee Dee San Jose, Senior Policy Officer, on 02 9242 4043.

Yours sincerely

Donna Rygate
Chief Executive

1. The proposed outcomes for ILC and the best ways to measure them

Questions you might like to consider:

- Do you agree with the nine outcomes outlined in the Consultation Draft? Is there anything else the Agency should consider?
- Do the nine outcomes cover everything you would expect to see in ILC?
- How should we measure each of the nine outcomes?
- How can people with disability, their families and carers and the broader community stay involved in measuring outcomes as ILC rolls out?
- Is there anything we should consider in setting up our data collection processes?
- Is there anything else you would like to tell us?

ILC outcomes and measurement

LGNSW sees the draft nine outcomes as broad, motherhood statements. Outcomes need to be specific, practical and clearly linked to performance measures relevant to people with disability and the broader community. They need to be framed in simple, accessible and friendly language, to be easily understood by all possible grant applicants (e.g. councils, mainstream services, community groups, and people with disability). For example:

- *How does the person with disability feel about the services received?*
- *Has it increased his/her choice and control of information, sense of connection, and well-being within the last year?*
- *How has it changed broader community awareness and inclusion practices?*

Measurement of the outcomes needs to be simple and easy. They need to suit the target groups, and there may well be a combination of methods. For example: use a scale rating system where people with disability can rate their sense of satisfaction with the information, capacity and/or linkages services received, together with an open-ended question where they can explain how the service helped improve their situation.

Other measures could include: how and what type of consultation has been conducted with people with disability and their families and service providers; survey of awareness of inclusion among mainstream community services, representation of people with disability on local planning groups, such as council access advisory committees.

Overall, NDIA needs to put mechanisms in place to prevent people with disability who missed out on Tier 3 individual funded packages, particularly those from special needs groups, falling through the gaps between Tier 2 (ILC) and Tier 3 (individual funded packages). This group of people needs to have access to and choice and control over a fair and flexible system that can recognise their changing needs in a timely and efficient manner. The importance of providing support at the broad community level needs to be recognised by providing adequate resources.

Councils' role in ILC

LGNSW sees one of the major challenges to the effective implementation of the ILC as ensuring that communities experience consistent inclusion practices in all geographic areas. In particular, it is important to LGNSW that communities in rural and remote areas are not disadvantaged. There is also a challenge to ensure that people with disability, their families and carers, particularly if they are isolated, have consistent and equitable access to ILC-registered providers, regardless of where they live; whether they are receiving any disability specific service supports; and whether they need culturally appropriate supports and linkages.

LGNSW is concerned that the Local Area Coordinators (LAC) take-up most of the funding under ILC. While their role consists of planning and capacity-building, the demands of the role may leave little time for building community awareness and capacity.

LGNSW believes the principles of Social Justice should underpin investment across the ILC streams. For local government 'social justice' is based on the application of the following four principles:

- *Equity* - fairness in the distribution of resources, particularly for those in need
- *Rights* - equality of rights established and promoted for all people
- *Access* - fair access for all people to economic resources, services and rights essential to their quality of life
- *Participation* - opportunity for all people to genuinely participate in the community and be consulted on decisions which affect their lives.

These principles underpin the planning and services of local government in NSW.

LGNSW believes that councils are best placed to perform the ILC function, particularly complementing the LAC role. They are the only organisation that guarantees geographic coverage of the whole country. People already use councils as a source of information and trust them to be independent. In the Hunter trial, councils have experienced increases in demands for information about accessible facilities, activities and supports. This is likely to increase once the NDIS is fully understood by the mainstream community. Data from the Hunter trial also indicates that people with disability are choosing to spend a high proportion of their packages on social participation. This reinforces the importance of ensuring that local communities are inclusive – a clear role for local government.

Currently, NSW Ageing, Disability and Home Care in NSW Family and Community Services (ADHC FACS) provides funding subsidies to non-output positions which include ageing and disability officers (ADOs) in some councils. ADOs have proven to be a sound investment, carrying out several capacity-building projects (e.g. setting up volunteer groups, running disability awareness campaigns for council, community and business groups with assistance from access committees), developing disability plans, advocating for the local area and being a reliable and useful contact for various stakeholders including governments. More importantly, ADOs have been supporting the disability sector for a long time, providing strategic advice and working on initiatives to fill gaps such as local disability workforce issues. While service providers are busy delivering services, ADOs often lead working parties and committees to resolve local and/or regional disability issues. Similarly, councils that provide information and advocacy services have an uncertain funding future. People with disability, families and carers, particularly special needs groups, heavily rely on these trusted local services for assistance.

Councils often contribute monetary and non-monetary resources (e.g. venues, publications, marketing, etc.) in order for these positions to function at their best. With the transition to the NDIS, councils are concerned about the community impact of losing the ADHC FACS subsidies and subsequently, the ADOs who are extremely experienced in ILC-type activities.

To date, there has been no coordinated approach between ADHC FACS and NDIA. Councils have not received clear and consistent information and guidance regarding transitioning valuable ADO positions and information and advocacy services into the NDIS. Some ADHC FACS contract managers briefly and randomly referred councils to ILC. The ILC Commissioning Framework draft is considering a competitive grants process which will favour large organisation and will negatively impact funding for these locally responsive services. Losing these important ADO positions and

information and advocacy services will create a massive gap in disability sector and in local communities.

LGNSW recommends the following and requests that the Agency provides more details and consideration into the final ILC Commissioning framework:

- Allocate ILC funding stream, similar to the LAC funding, to councils' non-output ADO positions and information and advocacy services, separate from the competitive grant process;
- Allocate guaranteed adequate, long-term ILC funding to councils' non-output ADO positions to cover all geographical areas (i.e. an ADO in every council or cluster of councils with similar needs); and
- Ensure an easier, more accessible and affordable quality and safeguarding process for ILC-funded providers including councils such as a modification of quality requirements to appropriately reflect the type of service (ie a non-direct service type).

LGNSW believes this is a reasonable and necessary recommendation given that LAC funding is higher than the other four types of ILC activities, and NDIS Tier 3 receives higher funding than the Tier 2. This move will ensure fairness and equity in service distribution for the majority of people with disability wherever they live.

2. How to prepare the sector for outcomes-based performance measurement

Questions you might like to consider:

- What are the biggest challenges for organisations moving to outcomes based funding?
- What can the Agency do to help organisations meet those challenges?
- What can people with disability, their families and carers do to help organisations get ready?
- Is there anything else you would like to tell us?

Councils are accountable to the community and are familiar with outcomes-based performance measurement, as opposed to simply measuring outputs. The emphasis on reporting outputs usually comes from traditional funding arrangements, such as Minimum Data Set (MDS). LGNSW is concerned that ILC functions must be adequately resourced to ensure that outcomes can be meaningfully reported. The following are some of the challenges and factors that may affect outcomes-based performance measurement:

- Inadequate time for testing and evaluating pilot ideas;
- Enormous time and resources required to prepare mainstream services and the community to recognise the human rights of people with disability and the need for inclusion;
- Inability (e.g. poor literacy) and unwillingness of target groups to respond to formal data collection methods (e.g. surveys, interviews);
- Reluctance of hard-to-engage target groups (e.g. special needs, multiple disadvantages) to provide information;
- Long, complex data collection methods may sometimes disrupt the project implementation process and create an administrative burden which is disproportionate to the grant received.

LGNSW recommends that the Agency provides more detail and consideration into the final ILC Commissioning framework for outcomes-based performance reporting. An outcomes-based performance measurement system should:

- Provide adequate and flexible time frames in the grant process (i.e. at least 3 months to apply, varying project durations, and at least 3 months to

complete final report);

- Allow block funding for council ADOs and Information and Advocacy services, similar to the LAC stream, so that councils can continue to deliver important services that meet local needs;
- Set the individual grant funding average to adequately cover the whole project including performance measures, and allow for variables for fairness and equity (e.g. long distance travel, CALD and ATSI supplements);
- Accept more informal outcomes-based data collection methods to suit special needs groups (e.g. informal one-on-one interviews, informal feedback collection at carers' groups particularly from CALD and ATSI backgrounds); and
- Provide clear, accessible outcomes-based performance measurement guidelines in multiple formats such as 'easy read' guidelines, FAQs, case studies and webinars.

3. How to grow social capital in the sector, particularly volunteering

While there are many different definitions of social capital, in this context social capital means things like volunteering or the relationships that organisations have with others in the community that contribute to the work of the organisation and help people with disability and their families.

Questions you might like to consider:

- The Agency would like to see things like volunteering grow in ILC. What can the Agency do to make sure that happens?
- What barriers might there be to growing social capital?
- What types of activities work well when delivered by volunteers?
- Is there anything else you would like to tell us?

Local government has a critical role in community development, which results in social capital enhancement. The LAC role needs to focus more on mainstream inclusion and needs to be considered separately from individual package planning.

While councils are best placed to implement ILC activities, short-term grants schemes are usually discouraging and disruptive to growing social capital (e.g. volunteering projects) which may otherwise thrive better with long-term funding.

It takes time, skills and resources to recruit and retain volunteers. There are increasing administration requirements relating to volunteers (e.g. criminal and working with children checks, WHS and code of conduct trainings, induction and supervision).

Volunteers have different skills and attributes. Matching them well to individual people with disability, roles and service type are important. Generally, volunteers have proven to be valuable assets to services that heavily rely on them such as food and social support services and not as much in complex administrative roles.

While there is a tremendous amount of good will through volunteering in local communities, like any other social capital development activity, the effective management of volunteers is resource intensive. For example, traditional Meals on Wheels food services are facing the challenge of gradually replacing their ageing volunteers. They also encounter financial barriers such as the rising cost of petrol and car maintenance which is not fully reimbursed. It is even more challenging to recruit and retain volunteers to suit people with disability from special needs group and in certain

locations. With social capital in limited supply, it makes it challenging to provide fair and equitable service distribution. Rural and remote regions often feel shortages in volunteers.

Mainstream services such as councils need financial support to provide more incentives for people from all ages and backgrounds to volunteer. They can also benefit from participating in an exchange of information on successful volunteering models. For example, Parramatta City Council trains all staff and volunteers in Social Role Valorisation principles, which commits them to human rights, person-centred and inclusive approaches, moving beyond the short-term altruistic approaches.

LGNSW recommends the following and requests that the Agency provides more details and consideration into the final ILC Commissioning framework:

- Ensure there is adequate grant funding for capacity-building projects involving volunteers;
- Allow adequate time to implement and evaluate innovative volunteer projects; and
- Encourage experienced local volunteering agencies to apply for long-term grants to service the needs of a particularly area.

4. How to prepare the sector for the requirements of the ILC sourcing process

The Agency is moving to a nationally consistent framework for ILC. Funding will be provided to organisations through an open competitive grants process.

Questions you might like to consider:

- What are the biggest challenges for organisations moving to competitive grant funding?
- What can the Agency do to help organisations meet those challenges?
- Is there anything else you would like to tell us?

As previously stated, LGNSW is concerned about the resource implications for small organisations in competitive grants processes. LGNSW sees the biggest challenges facing councils and other ILC applicants in a competitive grant funding environment as being:

- Lack of time, skills and resources;
- Long, complex, inflexible and onerous grant process;
- Short time frames for call for applications;
- Unrealistic and disproportionate grant funding average, project duration and expected performance measures;
- Complexity of processes required to become an ILC-registered provider; and
- Perceived unfair process lacking in transparency (e.g. Tier 3 NDIS-registered providers applying for Tier 2 ILC grants to add value to their services and supplement their incomes; a pattern of larger providers frequently receiving larger grants; and lack of fairness and equity in distribution of grants to geographical areas, areas most in need and special needs groups).

LGNSW recommends the following and requests that the Agency provides more details and consideration into the final ILC Commissioning framework:

- Design a fairer, simpler, more accessible grant process addressing the issues mentioned above (e.g. using simpler, friendly and accessible language and multiple communication formats);
- Providing clear, accessible outcomes-based performance measurement guidelines in multiple formats such as 'easy read' written guidelines, FAQs, case studies and webinars; and
- Recognise the value of smaller, under-resourced providers such as smaller councils and local neighbourhood centres in meeting the needs of people with disabilities, and the importance of making the grant application process relatively easy for them to apply.

5. Rural and Remote

The Agency would like to make sure that ILC meets the diverse needs of people with disability across the country.

Questions you might like to consider:

- What does the Agency need to consider when rolling out ILC in rural and remote areas?
- How can we encourage and support growth in ILC type activities in rural and remote areas?
- What things work well in supporting organisations working in rural and remote areas?
- Is there anything else we need to consider?
- Is there anything else you would like to tell us?

LGNSW is concerned that the principles guiding investment across ILC streams need to recognise the social and geographic characteristics of an area and provide adequate resources to ensure that social justice principles are met (i.e. equity, rights, access; and participation). Other factors that should be considered to ensure equity and access include the availability of services existing in an area and an understanding of the role of local government as an independent and trusted source of information.

Local government is particularly important as a community builder in rural and remote areas. The ILC framework should take into account the local knowledge and contacts that local government has in a community. The ILC framework should use local government as the foundation stone of the LAC role, rather than imposing new organisations onto an area.

LGNSW recommends the following and requests that the Agency provides more details and consideration into the final ILC Commissioning framework:

- Allow extra funding in the budget to cover variables (e.g. travelling long distances to implement the project or deliver the service; more incentives for areas where it is harder to recruit volunteers);
- Allow extra funding in the budget to provide services to special needs groups such as those with multiple disadvantages (e.g. well-matched volunteers travelling long distances to service people with disability who are also socially isolated; culturally appropriate supplements such as ATSI and CALD); and
- Allow extra time to implement innovative pilot projects, recognising scarcity in resources in rural and remote areas.