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NCOSS Submission on the DADHC New Directions in Day Programs.

Thank you for the opportunity to provide feedback on the new proposals for day programs.

NCOSS believes the stated aims of the Programs are very good, especially with the important inclusion of self-managed packages. NCOSS especially acknowledges the Programs' integration of a person centred approach, specifically involving the person's personal and individual goals.

There are constant references to the Program guidelines throughout the consultation draft. NCOSS could find no guidelines either attaching to the consultation draft or indicated on the website. When NCOSS called the very helpful Ashley Young on Tuesday 24 February to clarify *Stronger Together* targets, Mr Young directed NCOSS to the draft guidelines on the DADHC website. NCOSS found them to be buried under Tenders, in "archived closed tenders". Consequently, NCOSS is unable to provide feedback on the Program guidelines by the due date. Certainly other potential respondents may not have found the hidden guidelines. This represents an important missed opportunity for DADHC to receive constructive feedback from a range of key informants, especially organisations representing people with disability and families/carers.

Overall Comments:

Life Transitions and Program access

- Life Transitions can be difficult for people with disability and their families. Capably facilitating the smooth transition from one program to another will reduce the natural anxiety of the person and their family as their needs change.
- The age ranges for the Programs and the transitions should be indicative only, rather than rigidly mandatory. This reflects the life progression of non-disabled people, where people reach different life stages at roughly the same chronological time period but not necessarily rigidly in the same year.
- Similarly, people with disability can reach different life stages at earlier or later chronological ages, depending on the impact of their disability.
- It is unclear in the consultation draft whether people now using Post School Options will be transferred to the Life Choices Program and how this will happen.

- The transition between Life Choices and Active Ageing has not been explained.
- The consultation draft fails to explain what happens when a person exits Active Ageing around age 65 years and how this is facilitated. How is the person supported after this?
- It is unclear how people will enter the program in the first years. Will they be channelled from other programs? How do people not currently using any services enter these programs?

Personal Goals

- The Programs' emphasis on individual personal goal setting is very welcome.
- NCOSS recommends that whole-of-life goals are identified and recorded in the person's individual plan. Then the Program only tailors its support services to meet only those goals relevant to the Program. Other goals are addressed by other means, the responsibility for these resting with the person and their family. This could be important for people whose only support is this program and it also reduces the number of goal setting exercises for a person also using other disability services.

Access and Equity

- The importance of culturally appropriate services to Aboriginal people and people from culturally and linguistically diverse backgrounds has been acknowledged in the consultation drafts. There is little explanation however about how the programs and services will respond to this cultural diversity.
- The Productivity Commission Report on Government Services 2009 identifies significant under-representation of Aboriginal people and CALD people in the client profiles of disability services. There must be separate and deliberate strategies built in at the establishment of the programs, in order to avoid inequitable service usage for the new programs. These should be transparently explained so that potential service providers can prepare from the outset for services to their diverse client group.
- Similarly, day program services to people in rural, regional and remote areas at these life stages are critical for ongoing maintenance of the person. While the consultation draft also acknowledges this, there is no included explanation of how this will be managed and achieved.

Funding and decision-making

- NCOSS congratulates DADHC for including the model of self-managed packages from the outset of the Program. NCOSS believes that specific strategies must be implemented to encourage people and families to use this method of funding and decision making. Education, case studies and successful examples of achievement using the self-managed model will engender confidence among people and families to risk better individual outcomes for the person. There should be a clear acknowledgement that plans developed under a self-managed model can evolve over time and a guarantee given that, should this method not prove suitable, the person can revert to another funding model without loss of program/service.

Transport

- One of the most difficult aspects of the operations of the Transition To Work and Community Participation programs is transport. Many people using the Life Choices and Active Ageing Programs will require transport to access the programs, especially in rural areas or for those with ageing carers. NCOSS strongly recommends the provision of transport as part of these programs, not funded from an individual's allocation.

Use of HACC program

- There will be a proportion of people entering these programs who will either be already using or in need of complementary HACC services. Participation in these programs must not disqualify people and families/carers from access to complementary in-home support services from HACC. This would reflect the permissible complementary access to HACC services by people who live in Boarding Houses (using Active Linking program), HACC services to people in self care units, younger people in nursing homes and additional services to people on Community Aged Care Packages.

Specific Comments:

3.3 Operating Principles:

The Key operating principles are generally good.

3.3.7 Culturally appropriate and accessible

There is some concern about the statement that service providers will “need to design strategies...that are culturally appropriate and suitable to a broad range of individuals...” This seems to be at odds with individualised service planning. There should be no indication of lowest common denominator services where options meet the needs of most and offend fewest. Rather, service providers should be prepared with options that can respond to the particular needs of a person in a culturally sensitive way.

3.4 Key Service Activities

NCOSS recommends that point 7 responsiveness and flexibility appears after point 2, in line with the general person-centred approach promoted within the document.

The Box on Individual Plans is a good summary of this process and content.

3.5 Key Result Areas for Participants

The words “adjusted age” are undefined and the concept could be misleading and confusing. NCOSS strongly recommends deletion.

3.5.1 Life Choices

The point on **friendship and social networks** includes people in different age groups. The whole object of age-related programs is that people with disability can mix with people of similar ages to enable natural friendships. This is an opportunity often denied to or out of reach of people with disability. Accordingly, this point should be clearly included here.

Point 3 should also include the person's **preferences and aspirations**. In some cases, these preferences and aspirations will determine the type of activity most suitable to the person, and certainly indicate what to avoid.

3.5.2 Active Ageing

The name seems unfortunate, where many non-disabled people under 65 years may choose not to participate in a program called active ageing.

This section cites the “principles of active ageing” but provides no definition for the reader.

NCOSS appreciates the inference of a strengths based approach to individual planning and activities but the paper could benefit from this being made explicit.

The possibility of volunteering must not be omitted from Active Ageing, but instead perhaps could appear as a lower priority. Many, if not most, volunteers in HACCC and other support programs are retirees.

3.6 Model Options

As needs, ability and capacity change over time, the programs should also allow for participants to change their chosen model. As confidence grows, some people and families may choose to convert to a self-managed model, while others may start with individual community based and after a severe health incident choose to revert to a centre based model. The guidelines should specifically allow for such changes.

NCOSS congratulates DADHC on self-managed pilot and 2009/10 implementation process.

3.7 Types of Activities and Support

Recreation

The examples given are all centre based. Non centre based activities should also be included here.

Learning, education & skills

Suggest the inclusion of travel training and stranger danger.

Leisure activities

Strongly recommend the deletion of the words “rest time”.

Page 15 contains the first mention of the word **compatibility**. This is an incredibly important consideration where people will interact in small groups or shared activities or outings. Compatibility should be a featured consideration in both programs, appearing in several earlier sections of the document.

4.1 Eligibility

This contains the first mention of an assessment process. Eligibility and assessment are exceedingly important issues for people and families when accessing services. The proposed process for assessment, who will conduct it, how it is expected to occur and how funding levels are determined should be clearly laid out in this section.

4.2 Hours of support

NCOSS again congratulates DADHC on allocating funding on an individual basis, thereby providing some certainty for the person as well as flexibility about decisions and providers.

5.2 Aboriginal and CALD services

Additional supports should be provided to the person and their family to enable optimum understanding of the programs and how to make decisions. Ideally, these supports will be provided from an source independent of the provider using workers or advisers of the same or acceptably similar culture as the person.

NCOSS also supports the submission from Ethnic Communities Council and its recommendations on appropriate strategies and service provision for day programs to CALD people with disability.

6.1 Applications of the New Directions

Clearly, existing block funded day program providers are excluded from the new programs but encouraged to evolve their approaches accordingly. NCOSS recommends that a time period is mandated to this evolution. DADHC should provide operational supports to assist these service providers to evolve for the benefit of their service users.

6.2 Transition arrangements for service users

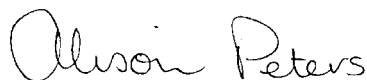
NCOSS is vitally interested in the establishment of good transitioning arrangements and would be pleased to be informed and consulted around the framework for these transition arrangements as they are developed.

The Paper would benefit from being clear about what DADHC expects will happen to support a person exiting the Active Ageing Program when they reach age 64 years.

In Conclusion

Thank you for the opportunity to provide feedback on the new Day Programs. Should you require further information or clarification, please contact Christine Regan on 9211 2599 ext 117 or chris@ncoss.org.au

Yours sincerely



Alison Peters
Director
NCOSS

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