

23rd February 2021

National Disability Insurance Agency (NDIA) Consultation Submissions Portal

Re: Consultation Paper – Independent Assessments and Access

The Association of Children's Welfare Agencies (ACWA) welcomes this opportunity to provide feedback on the consultation paper and proposed introduction of independent assessments. As one of the peak bodies for the NSW child and family sector, ACWA's Purpose is:

To advocate for and strengthen the capacity of the community service system to bring about effective reform to achieve better outcomes for communities, families, children and young people, particularly vulnerable children, families and communities.

Consistent with this commitment, our submission is focused on ensuring effective access pathways to the NDIS for vulnerable children with disability, who find themselves in out of home care environments – foster care, residential care, alternative care. A particularly vulnerable group are those who are leaving the care of the Minister at age 18.

For your consideration, we have outlined below a number of key issues which have been informed by the feedback and frontline experiences of our member agencies. In this regard, ACWA is currently undertaking an investigative project to determine how the best supports may be provided to children and young people with a disability who are in out of home arrangements and we have been able to seek the views of member agencies through a recent survey.

In principle, members acknowledge that independent assessments may result in more consistent assessment. However, a number of reservations were expressed which arise from challenges currently experienced when supporting these young people to access the NDIS, and from the very specific circumstances of those young people in not having the support of family.

In summary:

- Member agencies are concerned to ensure that the appointed independent assessors have the right skills and knowledge to undertake assessments for this group of children and young people, including a deep understanding of the complex impact of trauma on a child or young person, and the way that this may impact on development, functional capacity and assessments.

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Patron: Her Excellency the Honourable Margaret Beazley AO QC Governor of New South Wales

- Because of the complexity of trauma overlaying disability, it is unlikely that a perfunctory, time-limited assessment will provide a full picture of the young person's capacity, particularly given the lack of family support and the likelihood that background information about the child or young person may be fragmented.
- Member agencies are concerned that this represents yet another level of assessment for children and young people who are already extensively "assessed" and have many professionals coming and going from their lives. If not handled appropriately, further assessment could exacerbate existing trauma.
- Member agencies currently experience significant delays in access to appropriate professionals to provide assessments, particularly in regional and rural areas. They seek assurance that the proposed process does not add to the current delays but may in fact alleviate the delays.
- Given the over-representation of Aboriginal children and young people in the out of home care system, member agencies are keen to ensure that there are Aboriginal assessors available and / or that independent assessors with appropriate levels of cultural competency are available to support these children and young people and their carers.
- Many children and young people in out of home care have built a level of trust with some professionals which is essential for effective assessment. There is concern from some providers of out of home care services that an independent assessor is unlikely to have the opportunity to establish a relationship with the young person, and that this could affect the quality of the assessment.

ACWA is expressing these concerns on behalf of its member agencies who have a deep commitment to and experience of supporting the most vulnerable children in our communities, including those with disability who are already finding it more difficult to access NDIS supports.

Yours sincerely

A handwritten signature in black ink, appearing to read "S. Kinmond". The signature is fluid and cursive, with a large loop at the end.

Steve Kinmond, OAM
CEO