



**Australian Federation of
Disability Organisations**

**Submission to
Joint Standing Committee on the National
Disability Insurance Scheme**

**Informing the
Inquiry into the Capability and Culture of the NDIA**

16th December 2022

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1. About AFDO

Since 2003, the Australian Federation of Disability Organisations (AFDO), a Disabled Peoples Organisation (DPO) and Disability Representative Organisation (DRO), has been the recognised national peak organisation in the disability sector, along with its disability specific members, representing people with disability. AFDO's mission is to champion the rights of people with disability in Australia and support them to participate fully in Australian life. Our member organisations represent disability specific communities with a total reach of over 3.8 million Australians.

AFDO continues to provide a strong, trusted, independent voice for the disability sector on national policy, inquiries, submissions, systemic advocacy and advisory on government initiatives with the Federal and State/Territory governments.

We work to develop a community where people with disability can participate in all aspects of social, economic, political and cultural life. This includes genuine participation in mainstream community life, the development of respectful and valued relationships, social and economic participation, and the opportunity to contribute as valued citizens.

Our vision

That all people with disabilities must be involved equally in all aspects of social, economic, political and cultural life.

Our mission

Using the strength of our membership-based organisations to harness the collective power of uniting people with disability to change society into a community where everyone is equal.

Our strategic objectives

- To represent the united voice of our members and people with disability in national initiatives and policy debate.
- To enhance the profile, respect and reputation for AFDO through our members.
- To build the capacity and sustainability of AFDO and our members.
- To foster strong collaboration and engagement between our members and stakeholders.
- To enhance AFDO's connection and influence in international disability initiatives, particularly in the Asia Pacific region, through policy, advocacy and engagement.

2. Our members

Full members:

- Advocacy for Inclusion
- Arts Access Australia
- Autism Aspergers Advocacy Australia
- Blind Citizens Australia
- Brain Injury Australia
- Deaf Australia
- Deafblind Australia
- Deafness Forum of Australia
- Down Syndrome Australia
- Disability Advocacy Network Australia
- Disability Justice Australia
- Disability Resources Centre
- Enhanced Lifestyles
- Multiple Sclerosis Australia
- National Mental Health Consumer and Carer Forum (NMHCCF)
- People with Disability WA
- People with Disabilities ACT
- Polio Australia
- Physical Disability Australia
- Women with Disabilities Victoria
- Women with Disabilities ACT

Associate members:

- AED Legal Centre
- All Means All
- Amaze
- Aspergers Victoria
- Disability Advocacy and Complaints Service of South Australia (DACSSA)
- Disability Law Queensland
- Leadership Plus
- National Organisation for Fetal Alcohol Spectrum Disorder (NOFASD)
- Star Victoria
- TASC National Limited
- YDAS – Youth Disability Advocacy Service



3. Introductory comments & Acknowledgements

We thank the Joint Standing Committee on the NDIS for providing us with an opportunity to submit evidence to inform its Inquiry into the Capability and Culture of the NDIA.

It is imperative that the people administering the NDIS are well-placed to deliver a scheme that is truly person-centred and respects the human rights of those it was designed to support. This is critical to realizing a number of the rights expressed under the Convention on the Rights of Persons with Disabilities, which Australia has signed and ratified. We also remind the Committee that one of the key outcomes referenced under Australia's Disability Strategy 2021-2031 requires that:

“People with disability have access to a range of supports to assist them to live independently and engage in their communities”.

The following policy priorities are listed underneath this outcome:

- Policy Priority 1: People with disability are able to access supports that meet their needs
- Policy Priority 2: The NDIS provides eligible people with permanent and significant disability with access to reasonable and necessary disability supports
- Policy Priority 3: The role of informal support is acknowledged and supported
- Policy Priority 4: People with disability are supported to access assistive technology. 1

The effective administration and operation of the NDIS is critical to meeting the above deliverables. Further, we submit that Governments cannot expect to achieve significant change under the other outcome areas referenced under the Strategy unless people with disability have access to the personal supports they need to facilitate their safety, independence, inclusion and participation in everyday life.

This submission will respond to all three terms of reference for this inquiry, which are set out below:

a. the capability and culture of the National Disability Insurance Agency (NDIA), with reference to operational processes and procedures, and nature of staff employment

b. the impacts of NDIA capability and culture on the experiences of people with disability and NDIS participants trying to access information, support and services from the Agency; and

c. any other relevant matters.

In preparing this submission, we acknowledge the many people with disability across Australia who have experienced, or continue to experience violence, abuse, neglect, and exploitation. We also proudly acknowledge the rich culture of our first nations people and pay respect to their Elders past, present and emerging.

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4. Summary of recommendations

1. The NDIA must increase its target for the employment of people with disability to 25%, and the employment of people with disability in executive leadership roles to 18%. In doing so, it must:
 - Be open and transparent about how decisions around affirmative measures are made
 - Reserve a number of higher paid and executive leadership roles for people with disability
 - Make a concerted effort to increase the number of delegates with disability to ensure more people with lived experience are involved in decision-making processes.
2. The NDIA must streamline its recruitment processes to ensure decisions are made in a timely manner to attract suitably qualified staff, including those with disability.
3. The NDIA must ensure that accessibility is at the forefront of all requests for tender and contracts with third party providers. In particular, the NDIA and all partner organisations must closely adhere to AS EN 301 549:2020 – Accessibility requirements for ICT products and services when procuring new software and hardware.
4. The NDIA must continue to invest in low-tech options that meet the information needs of people with disability who are digitally excluded or lack digital confidence. This includes:
 - Having the ability to post out hardcopy information where this is requested by a person with disability.
 - Providing ongoing training for NDIA and NCC staff, and staff working for community partners, to ensure they are providing information that is accurate and consistent.
 - Reviewing the use of pre-recorded messages and automated key prompts in close consultation with people with disability, with a view towards implementing a system that is more person-centred and customer service oriented.
5. The NDIA must update its engagement strategy to outline how it intends to collect the views and experiences of participants who are digitally excluded.
6. The NDIA must review its internal processes for updating critical documents such as the NDIS price guide to better understand how previous mistakes were made and increase accountability measures to ensure such oversights do not occur in the future.

7. The NDIA undertake meaningful consultation with people with disability, and their representative organisations, to better understand how the planning process can be improved so that it:
 - Is accessible to all people with disability, including those with intellectual disability
 - Is not deficit-based and aligns with the Psychosocial Disability Recovery-Oriented Framework
 - Does not traumatize participants
 - Respects participants' right to communicate in a way that meets their needs
8. All staff responsible for planning and associated processes must be required to undertake training to enhance their capacity to:
 - Communicate in a way that is inclusive and culturally safe in particular to the needs of participants with intellectual disability, autism, brain injury, psychosocial disability, First Nations and Cald communities
 - Respect and incorporate augmentative and alternative forms of communication into the planning process.
9. The NDIA must implement new measures to ensure the lived experience of the participant and evidence provided by suitably qualified professionals are at the forefront of decisions around funding for “reasonable and necessary” supports.
10. The NDIA must adopt a framework that utilizes specialist delegates to advise on funding decisions pertaining to particular diagnostic groups.
11. The NDIA must consider implementing a lived experience advice line for planners to refer to when determining what supports are “reasonable and necessary” for a participant to have funded in their plan.
12. The Australian Government must reinstate the 10, 000 APS workforce operating model for the NDIA to enable the agency to undertake planning in-house, and prevent its continued reliance on contractors and labour-hire staff.
13. The NDIA must be prevented from making changes to a participants plan until such time that they have:
 - Contacted the participant via their preferred method of communication to inform them of any proposed changes, and the reasons for these changes
 - Invited the participant to attend a meeting to discuss the proposed changes in a meaningful and respectful way
 - Informed the participant of their right to have a support person or advocate accompany them during this meeting.

5. The NDIA's culture in relation to the employment and retention of people with disability

We commend the NDIA on several aspects of its recruitment process, noting that it:

- Participates in the RecruitAbility guaranteed interview scheme
- Adopts affirmative measures to address the underrepresentation of people with disability in the Australian public service
- Is A Gold Member of the Australian Network on Disability.²

While the agency narrowly exceeded its 17% target for the employment of people with disability in the last financial year, AFDO asserts that this target is still not high enough.

Ironically, the agency's most recent annual report states that one of its notable achievements for the 2021-22 financial year involved raising the targets of Local Area Coordination and Early Childhood Partners for the employment of people with disability from 15% to 20%. The fact that the agency has set a higher target for its partners than the Agency itself is perplexing.

Given the NDIA's role in administering a scheme that is designed to support Australians with disability, its target for the employment of people with disability must be significantly higher reflected across all levels.

Of concern is the fact that the agency's target for the representation of people with disability in senior executive level roles was just 12%, which was not met in the 2021-22 financial year.³ Further, at the time of writing this submission, the NDIA's affirmative measures job list for people with disability only included APS4 level positions.⁴ A search through the more comprehensive list of job vacancies, however, revealed positions at the APS6, EL1, and SES Band 2 levels.⁵

It is critical that the agency provides opportunities for people with lived experience to take on higher paid roles, including executive leadership roles. We would also like to see a greater push to employ people with disability as delegates to increase the number of people with lived experience who are involved in decision-making.

People with disability who have recently participated in recruitment processes with the NDIA report that it can take anywhere from three to six months to hear back from someone after an initial interview – even if they have been successful in progressing to the next stage. This trend makes it difficult for the agency to attract suitably qualified staff, as many will have moved on to other roles in the meantime.

We have also received anecdotal evidence which suggests some of the NDIA's internal processes and systems are still not fully accessible. This continues to have a detrimental impact on the employment and retention of certain cohorts of people with disability; particularly those who are blind, or vision impaired who rely on screen reading software.

Recommendation 1:

The NDIA must increase its target for the employment of people with disability to 25%, and the employment of people with disability in executive leadership roles to 18%. In doing so, it must:

- Be open and transparent about how decisions around affirmative measures are made
- Reserve a number of higher paid and executive leadership roles for people with disability
- Make a concerted effort to increase the number of delegates with disability to ensure more people with lived experience are involved in decision-making processes.

Recommendation 2:

The NDIA must streamline its recruitment processes to ensure decisions are made in a timely manner in order to attract suitably qualified staff, including those with disability.

Recommendation 3:

The NDIA must ensure that accessibility is at the forefront of all requests for tender and contracts with third party providers. In particular, the NDIA and all partner organisations must closely adhere to AS EN 301 549:2020 – Accessibility requirements for ICT products and services when procuring new software and hardware.

6. Issues relating to the increasing provision of digital information

Several of our member organisations have expressed frustration with the increasingly online nature of interactions with the NDIA.

While this may work for some people with disability, it is important to understand that there are still a high proportion of people with disability who are digitally excluded, or who lack the confidence to effectively navigate online systems and processes. There are a number of reasons for this. For example:

- Rates of internet access are lower among people with disability than other population groups.
- People with disability living in rural and remote communities often experience challenges with connectivity
- The price of internet-capable devices can be prohibitive for some people with disability – particularly those who require specialised assistive technology to facilitate their access
- Online systems can be complex and confusing for some people with disability to navigate.⁶

While the NDIA does provide low-tech access to information through its National Contact Centre (NCC), there are a number of existing challenges with the accessibility of this service. For example:

- When phoning the NCC, callers are required to listen to an extensive range of pre-recorded messages which don't relate to the purpose of their call. These messages are presented in complex, jargonistic language that can be inaccessible and/or overwhelming for some people with disability
- Callers are presented with a list of key prompts and must select the number that best relates to their enquiry. If a valid selection is not entered, the caller just gets cycled back to the main menu. This is incredibly frustrating for people with dexterity or cognitive issues, or other challenges that may make it difficult for them to interact with such systems
- Staff at the NCC commonly state that they are unable to post out information in hardcopy, and direct callers to access information online instead. For reasons stated above, this is not always possible
- People with disability frequently cite inconsistencies in the information they are given by staff. In some cases, callers have been given information that is completely incorrect. As an example, one person with disability reported being told that she would be taken off the NDIS and would need to move into the aged care system once turning 65, which is completely false and misleading

The NDIA's overreliance on digital systems also extends to its consultation processes. Earlier this year, for example, the agency invited NDIS participants, nominees and people who had previously applied to the NDIS to provide feedback to help the agency better understand:

- Experiences collecting information about a person's disability when applying for the NDIS.
- Experiences when collecting information for planning meetings.
- Feedback on how the NDIS can improve access and planning processes.⁷

It is our understanding that feedback was only sought via an online survey, which did not allow people with disability who are digitally excluded to have input. This is a glaring oversight which would have significantly skewed the results, as participants who are digitally excluded are likely to face far more unique barriers around information gathering and planning. It is unsurprising, however, when considering that the NDIA's own engagement framework does not mention how the agency will seek to understand the experiences and perspectives of participants who are digitally excluded.⁸

Recommendation 4:

The NDIA must continue to invest in low-tech options that meet the information needs of people with disability who are digitally excluded or lack digital confidence. This includes:

- Having the ability to post out hardcopy information where this is requested by a person with disability.
- Providing ongoing training for NDIA and NCC staff, and staff working for community partners, to ensure they are providing information that is accurate and consistent.
- Reviewing the use of pre-recorded messages and automated key prompts in close consultation with people with disability, with a view towards implementing a system that is more person-centred and customer service oriented.

Recommendation 5:

The NDIA must update its engagement strategy to outline how it intends to collect the views and experiences of participants who are digitally excluded.

7. Concerning oversights in NDIS policy

Advice from our members indicates that a recent update to the NDIS price Guide resulted in a number of important support items being omitted, including:

- Evidence-based early intervention services for autistic children, and
- Specialist orientation and mobility services for people who are blind or vision impaired.

These were deemed to be simple oversights which were eventually corrected. Nonetheless, it is difficult to understand how such oversights could have been possible in a scheme that has been operating for almost a decade.

This situation led to very real trauma for a number of participants who were faced with the possibility of having to go without the support they needed. Mistakes such as these erode public confidence in the scheme, as they give the impression that the agency does not understand the role particular interventions play in maximizing the independence, inclusion and participation of scheme participants.

Recommendation 6:

The NDIA must review its internal processes for updating critical documents such as the NDIS price guide to better understand how previous mistakes were made and to increase accountability measures to ensure such oversights do not occur in the future.

8. Challenges arising in relation to planning and decision-making processes

8.1. Trauma arising due to the deficit-based nature of planning conversations

Many people with disability report feeling traumatized by the planning process as it is deficit-based, and does not acknowledge their personal strengths and capabilities. This is reinforced by the following comment from a participant who is blind, who stated:

“I feel as though the planning process forces me to justify my existence in the world and makes me feel like I’m a burden on society.”

The deficit-based nature of the planning process means that many people with disability are choosing not to participate in their own planning meetings, which is at odds with the aspirations of the scheme.

One of our member organisations, Down Syndrome Australia, for example, explained that many families undertake pre-planning with their child or adult child with Down Syndrome, to safeguard them from the final planning meeting due to the negative impact it is likely to have on their psychological health and wellbeing.

Another of our member organisations, the National Mental Health Consumer & Carer Forum, has stated:

“Many people find such interactions are in fact more ‘disabling’ and exacerbate the very conditions that have led them to apply for the NDIS.”

Recommendation 7:

The NDIA undertake meaningful consultation with people with disability, and their representative organisations, to better understand how the planning process can be improved so that it:

- Is accessible to all people with disability, including those with intellectual disability
- Is not deficit-based and aligns with the Psychosocial Disability Recovery-Oriented Framework
- Does not traumatize participants
- Respects participants’ right to communicate in a way that meets their needs

8.2. Participants communication needs and preferences not being respected

Several of our members have relayed their frustrations with the inaccessible nature of the planning process. People with disability frequently report their communication preferences not being respected, with common themes including:

- Staff continuing to use COVID as an excuse to undertake planning over the phone where the person's preference is to meet face-to-face
- Planners and Lacs informing the person with disability that they cannot communicate in writing, even where this is necessary to enable the individual to fully participate in the planning process
- Staff placing an overreliance on family members or supporters in situations where the participant may use an augmentative or alternative method of communication to express their thoughts.
- Information not being provided in Easy Read or plain English, or staff using technical jargon that is difficult for some people with disability to understand.

By failing to accommodate peoples' communication preferences, the agency and its partners are in breach of their obligations under the Convention on the Rights of Persons with Disabilities; Namely articles 9 (Accessibility) and 21 (Freedom of expression and opinion, and access to information). In particular, Article 21 (B) of the Convention requires states parties to accept and facilitate:

"...the use of sign languages, Braille, augmentative and alternative communication, and all other accessible means, modes and formats of communication of their choice by persons with disabilities in official interactions."

Recommendation 8:

All staff responsible for planning and associated processes must be required to undertake training to enhance their capacity to:

- Communicate in a way that is inclusive and culturally safe in particular to the needs of participants with intellectual disability, autism, brain injury, psychosocial disability, First Nations and Cald communities
- Respect and incorporate augmentative and alternative forms of communication into the planning process.

8.3. Confusion around what constitutes a "reasonable and necessary" support

The notion of "reasonable and necessary" has been at the forefront of the NDIS since its inception. Regrettably, however, this concept has gradually been eroded by

a workforce that fails to recognise people with disability as experts in their own lives, and frequently disregards advice provided by doctors, Occupational Therapists and other allied health professionals.

We consistently hear about the agency refusing to fund supports or services that are in the best interests of participants. One of our member organisations, Deaf Australia, for example, reports the following common trends for Auslan users,

- Peoples interpreting funding being cut, or people being denied funding for interpreting altogether.
- Peoples' right to an interpreter being challenged if they also know spoken English, or have a hearing partner.
- People being forced to use the cheapest assistive technology solutions available rather than having the choice and control to try something that may better meet their needs.

In some cases, the level of interpreting funding provided for an Auslan user can equate to as little as two hours per month. This has a devastating impact on the participants level of autonomy and social inclusion, and prevents them from participating in activities in the wider community.

The criteria for determining reasonable and necessary supports, as stated on the NDIS website, requires that:

*"The support represents value for money in that the costs of the support are reasonable relative to both the benefits achieved and the cost of alternative supports. This means we need to consider the costs and benefits of the support, as well as the costs and benefits of alternative supports."*⁹

The initial expense relating to a particular support is not the only factor that should be considered. Some people with disability report being forced to "choose" cheap and often poor-quality assistive devices which either didn't work for the purpose stated, or had a significant environmental cost as they did not last long and soon needed to be thrown away.

Furthermore, we assert that a very real cultural issue with the NDIA's framework involves Planners assuming too much responsibility in the decision-making process. Planners generally lack the expertise to be able to determine which "alternative" supports would be a viable solution in a particular situation. As an example, one individual who is blind had requested funding for an electronic Braille display in their plan. This was rejected on the basis that a Perkins Braille was a cheaper alternative, and would enable the participant to meet the same goals. These are

completely different pieces of assistive technology that serve very different purposes, demonstrating a high level of ignorance on the part of the Planner. While the criteria for determining reasonable and necessary support state that the participants lived experience will be taken into account, in reality, this is rarely the case.

Participants are also commonly asked to provide extensive documentation from medical experts and/or allied health workers – often at a significant financial and administrative cost. This documentation is often either ignored or rejected in the context of planning and decision-making. If a suitably qualified professional has provide evidence as to why a particular support is reasonable and necessary, the matter of whether or not to fund it should be a simple administrative decision. Staff working within the scheme who do not have the necessary lived experience and/or qualifications should not have the capacity to override the advice provided in these reports.

We understand the Government is concerned about the financial sustainability of the scheme. Failing to fund supports that are truly in the best interests of the participant, however, will lead to further downstream costs for Government.

According to the Per Capita report, for every \$1 spent on the NDIS, \$2.25 is delivered back into the Australian economy.¹⁰ And for every \$1 spent on assistive technology alone, there is a conservative two-fold return on investment relating to savings on the cost of paid carers, support and medical services.

Recommendation 9:

The NDIA must implement new measures to ensure the lived experience of the participant and evidence provided by suitably qualified professionals are at the forefront of decisions around funding for “reasonable and necessary” supports.

Recommendation 10:

The NDIA must adopt a framework that utilizes specialist delegates to advise on funding decisions pertaining to particular diagnostic groups.

Recommendation 11:

The NDIA must consider implementing a lived experience advice line for planners to refer to when determining what supports are “reasonable and necessary” for a participant to have funded in their plan.

8.4. Inconsistencies in staffing and decision-making

Inconsistency is a common theme running through the planning process. People with disability frequently relay their frustrations with the seemingly transient nature of the workforce, noting that they never seem to have the same Planner twice. This results in participants having to constantly retell their story which can be triggering and retraumatizing.

Participants also note that Planners and Local Area Coordinators can be very inconsistent with their decisions. We feel that these inconsistencies stem from the fact that the NDIA has outsourced its planning function to community partners who each have their own work culture, and entrenched issues around the operationalization of the planning process.

We remind the Committee that Local Area Coordinators were never intended to undertake planning when the scheme was first established.¹¹ This is just one of several aspects of the scheme that have not been operationalized as originally intended.

In 2011, the Productivity Commission advised that a workforce of 10,000 would be required to properly resource the NDIA and allow it to effectively administer the scheme. To-date, however, the number of staff working at the NDIA still equates to less than half this number. This is largely due to the staffing caps that were imposed on the agency by the previous Government.¹²

Regrettably, this situation has forced the agency to continue outsourcing important aspects of its work, and to rely on hundreds of contractors and labour-hire staff who are not adequately or consistently trained.

Recommendation 12:

The Australian Government must reinstate the 10,000 APS workforce operating model for the NDIA to enable the agency to undertake planning in-house, and prevent its continued reliance on contractors and labour-hire staff.

8.5. Failure to engage with participants around critical changes

Many people with disability have experienced trauma as a result of their plans being decreased or altered without any prior notice.

In one situation, a participant's plan had been moved from self-managed to agency-managed under the assumption that they were misusing their funds, which was not the case. This change took place without any prior notice, or any effort to engage in a meaningful dialogue with the participant.

This trend shows a blatant disrespect for scheme participants. This approach is not person-centred, trauma-informed, or customer service oriented.

Recommendation 13:

The NDIA must be prevented from making changes to a participants plan until such time that they have:

- Contacted the participant via their preferred method of communication to inform them of any proposed changes, and the reasons for these changes
- Invited the participant to attend a meeting to discuss the proposed changes in a meaningful and respectful way
- Informed the participant of their right to have a support person or advocate accompany them during this meeting.

9. Concluding comments & References

We thank the Committee once again for providing us with an opportunity to submit evidence to inform its Inquiry into the Capability and Culture of the NDIS. As the peak body representing Australians with lived experience of disability, we look forward to working collaboratively with the NDIA to resolve many of the issues raised in this submission.

¹ Commonwealth Department of Social Services (2021) 'Australia's Disability Strategy 2021-31', P.19-21.

² National Disability Insurance Agency (2022) *Candidates with disability*, accessed 16 December 2022, retrieved from < <https://www.ndis.gov.au/about-us/careers-ndia/inclusion-and-diversity/candidates-disability>>.

³ National Disability Insurance Agency (2022) *2021-2022 Annual Report*, **Table 3.3F**: NDIA operating performance.

⁴ National Disability Insurance Agency (2022) *Jobs List - Affirmative Measures (Disability Only)*, accessed 15 December 2022, retrieved from < <https://ndiajobs.nga.net.au/cp/index.cfm?event=jobs.listJobs&jobListid=78926894-DC6B-82D0-4CFA-9AFE90639D76>>.

⁵ National Disability Insurance Agency (2022) *National Disability Insurance Agency - Jobs List*, accessed 15 December 2022, retrieved from < <https://ndiajobs.nga.net.au/cp/index.cfm?event=jobs.home&CurATC=EXT&CurBID=D7728DB5%2D737E%2D4121%2D97D2%2D9DB40136149D&persistVariables=CurATC,CurBID>>.

⁶ Australian Human Rights Commission (2021) *Human Rights and Technology Final Report*, P250.

⁷ National Disability Insurance Agency (2020) *Information Gathering for Access and Planning*, accessed 14 December 2022, retrieved from <https://www.ndis.gov.au/community/have-your-say/information-gathering-access-and-planning-igap>.

⁸ National Disability Insurance Agency (2022) *NDIA Engagement Framework: Strengthening our relationship with the disability community and enabling co- design*.

⁹ National Disability Insurance Agency (2022) Does the support meet the reasonable and necessary criteria?, accessed 15 December 2022, retrieved from <<https://ourguidelines.ndis.gov.au/how-ndis-supports-work-menu/reasonable-and-necessary-supports/how-we-work-out-if-support-meets-funding-criteria/does-support-meet-reasonable-and-necessary-criteria>>.

¹⁰ Per Capita, for National Disability Services (2021) *FALSE ECONOMY: The economic benefits of the National Disability Insurance Scheme and the consequences of government cost-cutting*.

¹¹ National Disability Insurance Agency (2015) *ILC Policy Framework*, accessed 16 December 2022, retrieved from < <https://www.dss.gov.au/disability-and-carers-programs-services-for-people-with-disability-information-linkages-and-capacity-building-ilc/ilc-building-policy-framework>>.

¹² Australian Greens (2022) *More staff and better training*, accessed 16 December 2022, retrieved from < <https://greens.org.au/about/MoreStaff>>. <