# Housing and Support Innovations Reference Group of the Independent Advisory Council of the NDIS

**Barriers to housing and support that increase cost pressures on the NDIS**

## July 2017

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# Executive summary

The purpose of this paper is to outline barriers to housing and support that may lead to cost pressure on the NDIS.

An understanding of context is critical to an understanding of barriers. The context includes participants who see themselves as dependent clients with little personal agency, a national crisis in affordable housing experienced even more sharply by people with disability and a COAG whole of government approach to people with disability that has not been implemented with serious intent.

From decades experience in state and territory crisis driven disability service systems, a significant proportion of participants and their families have learnt to maximise their deficits in an effort to maximise resources allocated to them and are frightened to use their initiative lest it reduce their eligibility or priority for government funded services and supports. These participants have spent their lives as dependent clients, defer to others as experts in their lives and have service plans in lieu of ordinary life goals.

The national crisis in affordable housing also impacts on people with disability. The NDIS estimates that at full Scheme, between 83,000 and 122,000 participants will have an affordable housing need. People with disability have significant difficulty in finding affordable housing as a result of challenges in the private rental market, their lack of priority in social housing, the lack of requirements on developers that would foster more affordable housing and the lack of financing options that could encourage investors and families to contribute to the provision of affordable housing. For people with challenges related to mobility, the constraints are even more significant as a result of the lack of mandatory minimum standards related to accessibility and a lack of action by the housing industry.

Finally, the COAG commitments[[1]](#footnote-1) to a whole of government responsibility for people with disability have not been implemented with the vigour required to ensure that mainstream systems and services are responsive to people with disability. This means that mainstream systems are constantly seeking to cost shift to the NDIS by failing to fulfil their responsibilities, for example, in the provision of accessible housing and in the provision of homelessness services for all people at risk of homelessness.

These contextual factors impinge on the NDIS capacity to assist adult participants to have choice and control in moving into a home of their own. The paper outlines five main challenges related to housing and support that could create cost pressure on the NDIS.

Examining the cost pressures over which the NDIS has direct control:

The first cost pressure relates to barriers to the adoption of contemporary approaches to housing and support in the NDIS. The lack of information about contemporary approaches to housing and support, the lack of contemporary options on the ground and the fact that reasonable and necessary support is guided by a Catalogue approach rather than an outcomes approach thwart the development of approaches that lead to better outcomes, often at lower costs. The failure to address these pressures will lead to a growth in demand for traditional shared supported accommodation. In addition, many participants exploring more contemporary value for money propositions need NDIA confirmation that their innovative use of reasonable and necessary support are considered proper.

Many providers (and now National Disability Services[[2]](#footnote-2)) are exerting pressure to remove the requirement for separation of housing and support that is recognised as fundamental to the contemporary best practice approach of SDA payments. The paper recommends upgrading current information strategies already in place as well as the use of the NDIA’s market steward role to foster the growth of contemporary approaches to demonstrate the process and the outcome.

A second cost pressure relates to people with disability not maximising their independence. Participants must be assisted to build informal support, enhance skills for independence and have personal safeguards in place as these capacity building ingredients are fundamental to enabling participants to live in contemporary housing and reducing the long-term need for care and support. The paper recommends enhanced effort at capacity building for participants.

A third cost pressure relates to the ineffective operation of systems and markets. The lack of a central repository of information about accessible housing means that accessible housing may be vacant or rented to a person who does not value the access features while a person needing access remains in inappropriate housing. Similarly the lack of mechanisms to find housemates will mean long vacancies in shared housing (SDA and non SDA), threatening the viability of an option for other residents. The paper recommends mechanisms for more effective matching of properties and home sharers.

The complex inconsistent approach to planning and building also reflects an ineffective market in which, for example, the variable interpretation of fire regulations in the National Construction Code potentially makes a significant number of Victorian participants SDA eligible where the requirement for fire sprinklers represents a ‘specialist built form.

A fourth cost pressure arises when the COAG interface principles are not implemented effectively and mainstream systems and services do not fulfil their responsibilities to people with disability. These high level pressures are outside the responsibility of the NDIS but the paper outlines evidence and discussion that could be used in representation in relation to the National Disability Strategy.

Finally, cost pressures related to the lack of safe, secure, affordable housing for some participants. Housing affordability is the responsibility of state and territory governments, including in relation to people with disability but many NDIS participants will continue to experience challenges. As a result many will seek to become SDA eligible. Some will remain in their family home longer than planned and this may lead to increased package size as participants loose skills or fail to develop skills, families experience burn out or participants develop behaviours of concern. Some participants will stay in shared supported accommodation when they could do well in less restrictive and less expensive options. Others will live in suboptimal housing in boarding houses or on the private rental market, having to move continually. This will have cost impacts on the Scheme including repeated home modifications and support associated with relocation and building new networks.

# Recommendations

The strategies identified below aim to address barriers to housing and support that may lead to increased costs for the NDIS. Those over which the NDIA has control are prioritised and relate to:

## Information about contemporary approaches

Strategies already underway: That the NDIA:

1. continues to provide Housing Options packages to assist participants explore housing and support.
2. uses general NDIS communication strategies to inform participants of the availability of support to explore housing and support options
3. continues to provide tenancy assistance to participants to locate property and negotiate with real estate agents and landlords
4. showcases contemporary options of housing and support including
	1. content e.g. approaches designed to enhance accessibility, facilitate informal and community supports
	2. process e.g. the process and support to enable participants to take up the options

That the NDIA:

1. uses an outcomes approach to reasonable and necessary support in Supported Independent Living, (providing advice as to the legitimacy of rent subsidy for home sharers as a value for money proposition in reasonable and necessary support)

## Capacity building

That the NDIA:

1. assists participants to build informal support, skills for independence and plan personal safeguards in readiness for supported independent living.

## Ineffective operation of markets

That the NDIA:

1. develops mechanisms that assist participants:
	1. to identify properties that meet their access requirements by seeding the development of a centralised repository of information about accessible housing
	2. locate people (other participants and people without disability) with whom they may want to home share.
2. supports the development of new approaches to housing and support, respite and day programs.
3. provides certainty about SDA payments including in relation to participants described in the Pricing and Payments Framework at 22 (see p15)
4. explores options for shared ownership models with SDA payments[[3]](#footnote-3)
5. co-designs the use of SDA payments with Aboriginal participants, their families and communities to explore requirements for cultural comfort in creating ‘home’ for Aboriginal people with disability.

## Implementation of the National Disability Strategy

That the NDIA:

1. makes representations to Housing Ministers in relation to:
	1. the National Construction Code (NCC) including the need for
		1. minimum mandatory accessibility standards and
		2. uniformity of treatment of relation to people with disability across states and territories
	2. increasing the availability of shared equity schemes to enable participants a share of ownership in their own homes, affordable rent and the ability to choose the specific property they wish to purchase.
	3. the need for targeted social housing allocations for people with disability.
	4. the importance of requirements on developers as a socially responsible way to increase the availability of affordable housing in mixed communities
	5. the need to provide targeted funds for affordable and accessible housing for people with disability through equitable access to aggregated bond models if adopted.

That the NDIA:

1. makes representation to Minister of Social Services in relation to:
	1. ensuring the Special Disability Trust enables investment for contemporary options of housing and support
	2. the need for research into policy options that reduce risks of a secure retirement for those who choose to invest financially in housing for their son or daughter with disability.

That the Agency:

1. makes representations to the Building Ministers to a national commitment to an access standard in the NCC.

# Introduction

The purpose of this paper is to outline barriers to housing and support that may lead to cost pressure on the NDIS.

An understanding of context is critical to an understanding of barriers. The context includes participants who see themselves as dependent clients with little personal agency, a COAG mandated whole of government approach to people with disability that has not been implemented with serious intent and a national crisis in affordable housing experienced even more sharply by people with disability.

The paper will outline threats and barriers that will increase cost pressure on the NDIS. Starting with barriers over which the NDIS has most control, the paper will outline cost pressures related to:

* barriers to the adoption of contemporary approaches including
	+ limitations in information about contemporary options
	+ the lack of available contemporary options on the ground
	+ a catalogue as against an outcomes approach to reasonable and necessary support
* the failure of the Scheme to maximise the independence of participants in ways that enable them to live in contemporary options of housing and support
* the ineffective operation of systems and markets
* the failure of the National Disability Strategy to deliver on the COAG commitment that people with disability are a whole of government responsibility
* the lack of affordable housing arising from the approach to allocation of social housing, from planning and building codes and from the lack of options to leverage finance.

Key sources used in preparation of this paper include discussion with thirteen (13) providers identified by National Disability Services[[4]](#footnote-4) and work by the Australian Housing and Urban Research Institute (AHURI), in particular a 2015 study *Moving to my home: housing options, transitions and outcomes of people with disability*, and a 2015 report *NDIS, housing assistance and choice and control for people with disability.*

# NDIS responsibilities in context

Contextual factors, outside the control of the NIDS impinge on Scheme capacity to assist participants to have choice and control and move toward social and economic participation and inclusion at the ordinary life stage transition of adults living ‘in their own home’.

A significant proportion of participants and their families have learnt to maximise their deficits in an effort to maximise resources allocated to them and are frightened to use their initiative lest it reduce their eligibility or priority for government funded services and supports. These participants have spent their lives as dependent clients, defer to others as experts in their lives and have service plans in lieu of ordinary life goals.

The COAG commitments[[5]](#footnote-5) to a whole of government responsibility for people with disability, has not been implemented with the vigour required to ensure that mainstream systems and services are responsive to people with disability. This means that mainstream systems are constantly seeking to cost shift to the NDIS by failing to fulfil their responsibilities, for example, in the provision of accessible housing and in the provision of homelessness services for all people at risk of homelessness.

A final and related contextual issue relates to the national crisis in affordable housing. The NDIS estimates that at full Scheme, between 83,000 and 122,000 participants will have an affordable housing need (Bonyhady 2014).

Specifically the COAG interface principles in relation to Housing and Infrastructure (Appendix B) demonstrate that issues of housing affordability and accessibility lie outside the NDIS, with the NDIS having responsibility for the user cost of capital (SDA payments), for reasonable and necessary support and home modifications.

# Key data about people with disability and housing

The housing and living arrangements of people who are most likely to be supported by an NDIS package (25-64 years old with a severe or profound disability) are markedly different to those of the rest of the population.

ABS data of people aged 25-64 years old with a severe or profound disability[[6]](#footnote-6) demonstrate that:

* close to 100,000 people with disability live with their parents (SDAC 2012 data)
* 16,433 people with disability (mostly intellectual) lived in over 4,000 group homes (AIHW 2014, p51)
* 3,459 people lived in institutions (despite four decades of de-institutionalisation) (AIHW 2014, p14)
* 79% are on low or very low income (Wiesel et al 2015, p34)

Housing tenure

* Home ownership rates are significantly lower than the general population (45% compared to 70% of general population) (Wiesel et al 2015, p34)
* 13.5% are pubic renters even though 79% are of low or very low income (Wiesel et al 2015, p34)
* Approximately 40% of households in social housing have a member with disability[[7]](#footnote-7) (representing nearly 160,000 households) (AIHW 2013, p40)
* The number and proportion of households in social housing dropped from 5.8% of households in 1998 to 3.9% of households in 2010 while waiting lists are burgeoning (NHSC 2013)

NDIS estimates of housing demand at full Scheme

* Between 83,000 and 122,000 will have an affordable housing need (Bonyhady 2014)
* By contrast 28,000 will be eligible for SDA payments (6% of the NDIS eligible population as recommended by the Productivity Commission)

Whist lack of affordable housing is a most serious challenge, the availability of contemporary approaches to housing and support will extend options for participants for both participants and non participants.

# Barriers to the adoption of contemporary options

## Lack of information about options

Most participants and their families have little information about more contemporary options for housing and support. They confuse concerns for certainty and safety with the bricks and mortar of shared supported accommodation and discount less restrictive options as ‘not for their son or daughter’.

The NDIS accepts its critical role in supporting participants and their families to consider a range of options of housing and support and allocates the Housing Options Package to explore options. Participants and their families are not aware of the assistance provided in both exploring options and in taking the steps required to prepare to move. Increased information about the availability of this support would increase participant confidence that help is available for such an important step.

Failure to ensure participants and their families understand the range of contemporary housing and support options will lead to a growth in demand for traditional shared supported accommodation.

## Availability of contemporary options

There are few providers of some of the more contemporary options and of significant concern is the fact that many argue they are not viable in the NDIS environment. Home share arrangements, such as that offered by Community Connections ACT are put at risk under the NDIS because the infrastructure costs to establish a match between a person with disability and a house-mate without a disability are difficult to fund in the current pricing regime[[8]](#footnote-8).

Other contemporary options such as KeyRing and Shared Lives, two innovative models of support described in the continuum paper have very little or no exposure in the Australian market. In particular, the concept of Shared Lives provides a significant innovation in support for people with disability, providing the opportunity for long term, short break and day support.

Failure to grow more contemporary approaches will reinforce the most restricted, more transitional options.

## Structure of price catalogue

The current pricing catalogue acts as a disincentive to some innovative provision that enables people with disability to live with people without disability. The challenges relate to:

* an inability to seek value for money in offsetting the rent of a home sharer for the negotiated assistance they provide
* the lack of provision for the infrastructure costs associated with volunteer programs

Many participants and providers identified challenges to supporting people with disability to live with people without disability in the NDIS environment. The concern was widely shared, by representatives of people with disability wanting to live in their own home, by providers wanting to transition their group homes into more contemporary arrangement[[9]](#footnote-9) and by providers wanting to head lease a property on the private rental market where a person(s) with disability could live with others who don’t have a disability.

All these options move toward contemporary approaches by building informal support and maximising inclusion. The barrier they experience however is the ability to subsidise the rent of the people without disability who provide negotiated informal support to the person with disability. Examples in the Netherlands and in Australia demonstrate that the value of negotiated informal support is significantly greater than the price of the rent subsidy.

In the Netherlands, students live rent free in nursing homes *and in exchange, spend at least 30 hours per month doing some of the things professional staff cannot always do – such as hanging out’[[10]](#footnote-10)*. At present, there is no transparent option under the NDIS for people to use their reasonable and necessary support to offset the rent required for an additional bedroom for a home sharer. Some participants from state and territory schemes for supported living (ACT, NSW, WA and Q’ld) have been able to offset the rent for a home sharer from their resources for support. Some participants fortunate enough to be Housing NSW tenants are able to provide a bedroom rent free for a home sharer because Housing NSW does not take into account the income of a home sharer of a person with disability when calculating the household income as the basis for rent.

Some NDIS participants have subsidised the rent of their home sharer through their reasonable and necessary support but fear that it will be considered an improper use of resources and seek formal clarification that this represents a legitimate, value for money proposition. A system that allowed participants to report their use of reasonable and necessary support against agreed outcomes rather than line items in the Pricing Catalogue would resolve this issue.

## Concern that initiative may reduce eligibility for SDA

There are concerns that the hard work of families in building informal support, securing home sharers and family subsidising rent on the private rental market may deem the participant ineligible for SDA because they are already living outside specialist group form.

Although the SDA Pricing and Payments Framework at 22 recognises this target group in its identification of participants for whom specialist disability accommodation is reasonable and necessary, steps must be taken to safeguard this inclusion in the context of the significant demand for SDA that may outstrip supply and projected demand.

It is critical that this group remain eligible for SDA in order to continue to incentivise and reward initiative.

## Lack of transition pathways for traditional approaches

The bulk of the SDA housing transitioned from State and Territory systems are traditional group homes and larger cluster facilities. Whilst SDA pricing gives clear signals in relation to requirements for transition, there is no guidance as to how, for example, a traditional 5 bed group home (eligible for SDA payments) can offer a more contemporary lifestyle with supporting residents to become more independent and more included.

One option described above uses a 5 bedroom group home for 3 people with disability and 2 people without disability. Providers indicate however that there are 2 barriers to this providing a financially viable solution:

* the approach leaves a gap in household rent because the people without disability are usually rent free in return for negotiated support
* SDA payments are structured around the number of bedrooms in the house, not the number of SDA eligible individuals in the house. This means that if an SDA house with 5 bedrooms house has only 3 SDA eligible residents, the SDA payment per resident is less than if there were 3 SDA eligible residents in a 3 bedroom house.

These constraints represent a significant disincentive to enabling people with disability to live with people without disability in SDA and non SDA housing.

# Failure to maximise the independence of participants

A second cost pressure relates to people with disability not maximising their independence. Participants must be assisted to build informal support, enhance skills for independence and have personal safeguards in place as these capacity building ingredients are fundamental to reducing the long-term need for care and support. The paper recommends enhanced effort at capacity building for participants.

# Provider concerns in relation to SDA

Providers identified a number of concerns in relation to SDA that they perceive will be barriers to the provision of increased housing and support. Failure to clarify their concerns will lead to pressure to amend what is good practice contemporary policy in relation to housing and support. It will also delay investment in housing options.

## Separation of housing and support

A number of providers and now National Disability Services[[11]](#footnote-11) have expressed concern that the complete separation of housing and support would mean that less money would be available for housing.

Separating the funding for housing from the funding for support is a most significant step forward in the SDA policy because it enables the spread of models of housing and support that are separate. Critically, the NDIA expects that participants to be able to change their support without having to move home and that service agreements will confirm this. In shared arrangements, consensus decision-making will be the expected as at least some supports will be shared.

Serious investigation of the practical, legal and financial implications in each jurisdiction will be required to decide the viability of mandating separation.

## Robust housing

Some providers argued that the SDA prices for robust housing did not reflect the costs associated with repairs required by some participants and the anticipated shorter life of the property.

The NDIS has announced[[12]](#footnote-12) that extraordinary reactive maintenance will be considered on an individual plan basis. If the Robust plus extraordinary reactive maintenance are insufficient to grow a market designed to meet the needs of participants engaging in behaviours of concern, then the NDIA will, consistent with its role of market steward, consider options to address this under-functioning, thin or failing market.

## Financial sustainability and vacancy management

Some providers expressed concern about the tension between financial imperatives of filling vacancy in a commercial housing situation and time frames required to consider compatibility of potential residents.

The NDIA will provide vacancy payments (for between 60 and 90 days following a participant’s departure), intended to support good practices in considering compatibility within households. Over time, the projected increase in smaller housing forms will minimise the challenges associated with finding compatible residents in larger housing. For example, finding a resident compatible with one two others in considerably easier than requiring compatibility with 4 others.

## Barriers related to uncertainty

Many providers argued that the lack of certainty around SDA payments is serious inhibitor to institutional investors because of the regulatory risks associated with uncertain and changing rules.

The main uncertainties have now been clarified in the SDA Rules and associated SDA documents (terms of business, price guide and guide to suitability). Continued uncertainty relates to:

* transition issues (how will the Quality and Safeguard Framework apply to SDA in each jurisdiction with Victorian capital development guidelines as a case in point);
* how in-kind will actually operate and potential impacts on choice and control and the market if in-kind is preferenced over non in-kind options
* the nature and location of actual demand and
* how vacancy management will work in transition.

## Cultural sensitivity

One provider whose experience derives from working with Aboriginal people in remote and very remote areas argued that SDA requirements would need some adjustment if housing was to be developed in a culturally sensitive manner for Aboriginal people with disability. She noted that in the NT, social housing for Aboriginal people in remote areas is more enduring when organisations manage the tenancies because the built environment is a foreign environment for many indigenous people who are coming to terms with the type of shelter provided. Many are used to living in houses that are overcrowded (with a reported average number of residents per house at 16) and are still coming to terms with unfamiliar appliances such as a washing machine that might be used to clean excessive blood and fir from a recently slaughtered kangaroo and a fridge that seems like a useful home cooling device if the fridge door is removed.

SDA provides real opportunities for Aboriginal people with disability in remote areas, if there is an opportunity to reframe in a culturally sensitivity manner to create housing that is:

* more aligned with open plan living in a settlement layout
* for an individual in a family and community rather than the current focus on the individual less connected to family and community
* designed via a community development approach that takes account of family dynamic and uses a story approach to create a home for individuals and/or family

### Strategies to enable cultural comfort

A co-design process with Aboriginal participants, their families and communities is a useful strategy to explore requirements for cultural comfort in SDA payments in order to develop housing that creates ‘home’.

# Lack of affordable housing for people with disability

The lack of affordable housing will have a significant impact on the capacity of the NDIS to deliver on its vision. It will mean that people with disability will remain living with families whose capacity to care will diminish, they may lose skills for want of opportunity to become more independent, some may become frustrated exhibiting behaviours of concern and some will remain living in shared supported accommodation even when they have capacity to live more independently.

Families will feel the impact. Many will become tired and alienated and lose the capacity to support the transition of their family member from family home to their own home.

For the NDIS the lack of affordable housing will increase pressure for participants to become SDA eligible.

## Barriers to housing in the private rental market

In his study examining housing transitions and outcomes of people with disability, Wiesel et al[[13]](#footnote-13) summarised the barriers to accessing the private rental market in terms of affordability, discrimination, lack of rental history and references, shortfall in accessible and adaptable private rental stock and a shortfall in culturally appropriate housing for indigenous people with disability.

Wiesel found that people with disability who rented on the private rental market paid close to double the rent that would be considered affordable[[14]](#footnote-14). Whilst most private renters received Commonwealth Rent Assistance (CRA), this did not alleviate their housing stress because CRA is based on fixed formulae and not designed to meet affordability targets.

Anecdotal evidence indicates that some real estate agents and landlords are concerned about renting to a person with disability. Actual discrimination may be difficult to prove in the context of a competitive market and the fact that having lived with parents or in shared supported accommodation, many people with disability lack rental history, references and employment, preconditions for tenancy for most real estate agents.

The challenge for many people with mobility restrictions is that housing in the private rental market is largely inaccessible. Whilst under the *Disability Discrimination Act 1992* tenants have the right to modify a rental property within reason and the NDIS is able to pay for home modifications as part of reasonable and necessary support, many landlords are reluctant to allow modifications even where they are not obliged to pay for them. Given however that tenants are obliged to remove the modification at the end of their tenancy, the cost to the Agency is increased.

The insecurity of tenancy on the private rental market can be a significant barrier for many people with disability. Wiesel found that study participants in private rental had little security about the long-term sustainability of their tenancies and hoped eventually (in the medium or long term) to move out of their current private rental dwelling. The study reported that the general desire to move among private renters suggests their satisfaction with their housing and outcomes were generally poorer compared to that of social renters, possibly because of the higher costs of housing. It is also possible that private renters, precisely because their tenancies were less secure, more actively considered alternative housing options.

Insecure tenancies lead to stress for the participant and cost for the Scheme. In addition to the cost of home modification and its removal, the NDIS must meet the cost of reasonable and necessary support many participants will require to successfully transition into a new home and get to know their local community.

### Strategies to increase the availability of housing on the private rental market

Wiesel found that in capital cities, no participant was able to afford renting privately without sharing. Whilst sharing makes properties affordable, it brings other challenges. Of particular concern is the sustainability of housing when a sharing arrangement dissolves and tenants have to identify a new suitable flat mate to be able to stay in their existing housing. Most Australians have a variety of living arrangements across their lifespan and this is desirable also for people with disability. For people with disability however, challenges related to sharing will tend to continue over a greater proportion of the lifespan than Australians without disability exacerbating the challenges of planned and unplanned transitions related to the movement of flatmates.

Five strategies that address some of the challenges in private rental include:

Challenge: Assistance to locate a suitable property and negotiate with real estate agents and landlords.

Solution: The Agency already provides tenancy management support to assist participants to locate suitable housing and negotiate with real estate agents and landlords.

Solution: Some participants with poor or no rental history have been assisted by a non-government agency taking out the lease on a property and subleasing to agency clients. This strategy gives the landlord a sense of security, and people who would otherwise be excluded from the private rental market a way into the market. This may not however provide a solution at scale because of the risk assumed by the non-government agency under this arrangement.

Challenge: Assistance to identify properties that meet access requirements. It is currently impossible to identify the existing stock of housing with accessibility features.

Solution: The development of a central data repository of accessible housing in all markets for all Australian states and territories. Such a system will support the efficient and effective use of existing accessible stock.

Challenge: Assistance to address the affordability issue via home sharing:

Solution: Processes to assist participants to locate suitable home sharers. Safeguards are required to support the viability of the tenancy when a house sharer leaves.

Solution: Where a person with disability lives with a person(s) without disability who provide negotiated informal support, adopt an outcomes focused approach to reasonable and necessary support whereby any reduction in the rent for the home-sharer can be met through reasonable and necessary support where that subsidy represents value for money when compared to the cost of paid support.

## Barriers to home ownership

The primary barrier to accessing home ownership is the high cost of purchasing suitable properties in appropriate locations. Increasingly many Australians and most people with disability cannot afford either the initial capital investment, or the ongoing costs of home ownership.

Wiesel reports that people with the means to consider home ownership face still further barriers arising from the absence or lack of financial records and the absence of capacity assessments designed to examine borrower’s understanding of their legal and financial responsibilities as mortgaged home owners.

Wiesel’s study reported that those who were successful becoming home owners did so through support from family, the use of inheritance or compensation payments and the use of shared equity schemes.[[15]](#footnote-15)

### Strategies to increase home ownership

Two main strategies to increase home ownership include the provision of incentives to assist families to purchase a home and the use of shared equity schemes.

The Australian Government developed the Special Disability Trust as one option to promote home ownership for people with disability. The Australian Government provides favourable tax concessions for a trust established primarily for succession planning by parents and immediate family members. Strict criteria require the purpose of the trust to be for the current and future care and accommodation needs of a person with a severe disability or medical condition.

Government policies concerning the treatment of ageing carers will have a major impact on the success of the NDIS in leveraging family equity. Research is therefore recommended into policy options that reduce risks of a secure retirement for those who choose to invest financially in housing for their son or daughter with disability[[16]](#footnote-16) .

In a recent report, Wiesel[[17]](#footnote-17) outlined options for shared ownership in which ownership of a dwelling is divided between a person who lives in the house and a ‘non person’ equity partner such as a financial institution, a government department, or a not-for-profit housing organization. Shared ownership models enable consumers to access and sustain home ownership, even though they have lower income and savings than those that are typically required to afford a loan deposit and repayments. Shared ownership includes shared equity and mixed equity models and is considered to be one of several policy options that can help address unmet need in affordable housing and barriers in entry to home ownership for people with disability. Wiesel outlines four options targeted at specific cohorts of people with disability, all of which he argues could be scaled up to address distinctive policy objectives and target groups through SDA. Wiesel anticipates that some restructuring of SDA payments may be required.

## Barriers to access to social housing

The major barriers experienced by people with disability in accessing social housing are their ineligibility for priority housing when living with their parents or living in shared supported accommodation and the shortfall in accessible or adaptable social housing stock.

‘Social housing registers across Australia are segmented and while applications in the ‘priority’ segments are likely to receive an offer of housing within several weeks or months, applicants in the non priority segments could wait for many years or even indefinitely. Priority housing is reserved for people experiencing or at immediate risk of homelessness, or living in unsuitable housing, and considered unable to secure housing in the private market. People living with their parents or in shared supported accommodation, regardless of their dissatisfaction with these arrangements were not eligible for priority housing’[[18]](#footnote-18).

Wiesel identified a range of design requirements that challenged people with disability in accessing social housing. These included the lack of accessible stock, the challenge of modifications to existing dwellings, the difficulties of negotiating with housing providers, the lack of recognition of specific requirements for some people including the need for a separate bathroom to enhance privacy in sharing arrangements, fencing to prevent a man with autism from ‘wandering off’, a courtyard for a guide dog for a blind man and a ground floor apartment for a woman with epilepsy. [[19]](#footnote-19)

Live in carers add complexity and may also be a barrier to social housing for some participants. Whilst most social housing providers will provide an additional bedroom for a person who needs a live in carer, there is a variable response as to whether the income of the carer is taken into account in the assessment of household income for the determination of rent.

Tenants who offer rent free accommodation in acknowledgement of negotiated informal support will be limited as to the type of people who can be home sharers because persons with income above a certain minimum level may not be eligible to live in social housing and if permitted by social housing providers, rent at 25% of their income may make the arrangement financially unattractive. In addition, whatever the level of rent contribution by the home sharer, a tenant on the DSP or other low income will need to meet the cost of the rental subsidy from their reasonable and necessary support.

In the Wiesel study, participants who secured social housing were assisted by:

Nomination rights

‘Nomination rights’ arrangements involve properties owned or managed by community housing providers that are reserved for clients of a particular support provider. Nomination rights typically arise when support providers who originally managed these dwelling transfer them to the management of community housing providers, or when capital grants or operating leases for housing are tied with requirements for ‘nomination rights’.

Nomination rights enable the support provider to nominate one or more of the clients as preferred applicants for a new housing vacancy, typically with implicit or formal commitment to support that person throughout the duration of their tenancy (often in the form of MOUs that are not contractually binding.)

The advantages of nomination rights for housing providers include: reduced risk and increased certainty that the selected tenant will be supported throughout their tenancy; better matching of properties to tenants: drawing on the support provider’s familiarity with the person they support, leading to more appropriate and sustainable tenancies.[[20]](#footnote-20)

A critical concern with respect to nomination rights is the potential impact on people with disability’s choice and control. There is a risk that such arrangements will limit opportunities for participants to change their support provider in order to remain in their home. It is important to ensure that while such arrangements enable support providers to make a nomination, the person who was nominated has their own lease agreement and is not required to retain the nominating support provider in order to stay in their home. As noted by Community Housing Federation of Australia CHFA (2014), in some cases, housing providers will need to enter into a new formal or informal agreement with the new support provider chosen by the person[[21]](#footnote-21).

Transitional housing

In the Wiesel study, a number of participants with a range of psycho-social, physical and intellectual disability moved into transitional housing as a temporary arrangement before moving into long term social housing. These participants were nominated to transitional housing placements by a range of community agencies assisting vulnerable people. Many but not all of the people offered transitional housing were promised that they could remain in the transitional housing until they were offered a long-term tenancy.

Transitional housing is often quasi permanent due to the limited supply of suitable affordable housing. This might provide a level of security to current tenants, but clogs the promised flow through often promised by transitional housing programs.

Targeted social housing allocations

In the Wiesel study*,* some participants were able to access social housing due to their participation in government programs such as the DHASI program in NSW and the Exits Project in Victoria. Such programs involved close collaboration between government, non-government providers, advocates and housing associations and enabled tenancies to be finalised with people who would not normally receive priority allocations.

### Strategies to increase access to social housing

Targeted social housing allocations appear to be the only way to overcome access barriers to social housing arising from lack of priority and hence represent a preferred strategy. A targeted approach is more likely to lead to appropriately designed and located housing which has the capacity to achieve savings in the ongoing costs of support. Over time, such savings will offset the capital investment.

Tenancy support, already available as part of reasonable and necessary support, will also play a vital role in assuring a social housing landlord that the participant is able to meet his/her tenancy responsibilities.

# Barriers in planning regulations and building codes

The complex inconsistent approach to planning and building has a significant impact on the availability of accessible and affordable housing, forcing people with disability to remain in shared supported accommodation or living with their families.

## National Construction Code (NCC)

Many of the providers interviewed in the preparation of this report commented on inconsistencies and challenges in implementing the NCC. They commented that while the NCC is a national instrument, it is implemented in conjunction with state and territory regulations leading to very different outcomes. The variation is most evident in relation to fire regulations where for example, in Victoria, if two (2) or more unrelated people with disability live together, the property becomes a class 3 property requiring onerous commercial requirements including fire sprinklers. In Western Australia and South Australia however, six (6) unrelated people living together is classified as Class 1b property without the requirements of Class 3 buildings.

Of particular significance to the NDIS is the fact that the onerous requirements for fire sprinklers in Victoria increase the number of participants eligible for SDA because it can be argued that the requirement for fire sprinklers represents a requirement for ‘specialist built form.’ [[22]](#footnote-22)

There was a general sense from the providers interviewed that the NCC included many broad brush requirements that added expense where not required. For example, plumbing regulations require a thermatic mixing valve (to ensure tempered water) in any house where a person with disability lived. Whilst an important protection for people with limited mobility, it meant people with other impairments were prevented from having water temperature of choice. In addition, the requirement of an annual service of thermatic valves (as possible sources of legionnaires disease) added to cost.

## Variations in state and local government

Variations in state and local government planning codes also reduce the opportunity for national consistency of opportunities for NDIS participants. The development of granny flats as a strategy to increase affordable dwellings is a case in point. NSW regulations make it easy to build a granny flat where Victorian regulations (which are currently being reviewed) require proof that the future occupant is a dependent person, such as a teenager or disabled elderly parent and require the granny flat be removed if the person dies or moves out. Such variations could have a significant impact on the availability of affordable housing for NDIS participants.

The 2016 report of Affordable Housing Working Group of the Council on Federal Financial Relations (Affordable Housing Working Group) noted that the success of innovative financing models aimed at improving the supply of affordable housing required a variety of complementary reforms to provide the right environment. Nationally consistent planning and zoning regulations were specifically identified.

Whilst variation in the implementation of the NCC across Australia can have substantial financial impacts for the NDIS, harmonisation seems unachievable in the immediate period with the myriad of influences guiding state and local government planning and regulation.

## Lack of requirements on developers

By placing requirements on developers, state and local government can ensure new developments include a certain percentage of affordable housing, for sale or lease to eligible households below certain price points.

### Strategies related to developers

Increased affordable housing could be achieved through inclusionary zoning policies such as those adopted in some Australian States and Territories. For example, the South Australian Housing Strategy commits to ensuring that at least 15 per cent of all new housing (government and private land developments) in significant developments is affordable to low and moderate income households. Western Australia’s Affordable Housing Strategy 2010-2020 also includes a commitment for government land and housing developments to include a minimum of 15 per cent affordable housing.

Recognising that developers will consider any use of planning mechanisms to mandate affordable housing as a reduction in land value, states with inclusionary zoning policies have limited them to state-owned land earmarked for redevelopment.

The Affordable Housing Working Group outlined other planning tools that can be used to enforce or encourage the development of affordable housing including:

* mechanisms that protect existing sources of affordable housing, such as change of use controls on land or buildings
* incentives to encourage the development of areas likely to be accessible to lower income cohorts, such as additional floor space (‘density bonus’)
* mandatory requirements for developers to contribute to affordable housing, and
* application of developer levies that fund the construction of affordable housing.

## Barriers to the inclusion of access features in housing

In the past decade there has been significant discussion but little progress in relation to the inclusion of access features for housing into the National Construction Code (NCC). The challenges relate to:

* inconsistency across Australia in what is considered accessibility in housing including between requirements of the NCC, Livable Housing Australia Guidelines, the numerous other voluntary guidelines across Australia and universal design[[23]](#footnote-23)
* lack of action by the housing industry on the COAG commitment in the National Disability Strategy 2010 – 2020 that *“all new homes will be of an agreed Universal Housing Design Standard by 2020 with interim targets to be set within the 10 year period”[[24]](#footnote-24)*.

The voluntary approach to improving access has led to minimal change[[25]](#footnote-25). This was noted by the Productivity Commission in its 2004 report into Reform of building regulation that identified a place for regulation, particularly when it comes to access for people with disability.

*Governments sometimes intervene in the market for social purpose of ensuring certain minimum standards of accommodation (including access to buildings) for all. It is most unlikely that certain building qualities, such as access for people with disabilities, would be delivered widely in the absence of government intervention.[[26]](#footnote-26)*

The Productivity Commission Report acknowledges that home-buyers are often inexperienced and ill-informed about the building process, and could not be relied upon to consider their future access needs or to demand access features for ‘the common good’ including visitors and future residents.

The only standard in relation to housing is AS4299 that was developed in 1995 and needs review to come into line with the National Disability Strategy. The Australian Network on Universal Housing Design (ANUHD) leads the move for all new housing construction to include access features and was supported in September 2016, by Bruce Bonyhady on behalf of the Agency. Bonyhady joined voices calling for minimum accessibility standards to be included in building codes (the National Construction Code) at a Silver Livable Housing Australia standard on the grounds that the cost is minimal. [[27]](#footnote-27)

The decision point for the inclusion of access features in housing is the Building Ministers’ Forum that has authority to require appropriate amendment of the NCC. The issue was discussed at the Building Ministers’ Forum in December 2016, where six of the eight State and Territory Ministers committed to a minimum accessibility standard. The issue will be further discussed at the next Building Ministers’ Forum in March 2017.

### Strategies to increase availability of accessible properties in all markets

The national commitment of the Building Ministers to an access standard in the NCC would be a significant step in increasing the availability of accessible properties in Australia.

# Lack of options to leverage finance

## Leveraging funds from institutional investors

The Affordable Housing Working Group of the Council on Federal Financial Relations recently investigated innovative financing models aimed at improving supply of affordable housing, focusing on models that attract private and institutional investment at scale[[28]](#footnote-28). This work is a positive step but even if adopted, without targeted action, people with disability will not access new finance or see the impact of any growth in affordable housing.

### Leveraging funds through aggregated bond models

The Affordable Housing Working Group recommended the establishment of a financial intermediary to aggregate the borrowing requirements of affordable housing providers and issue bonds on their behalf. It was argued that this bond aggregator model offers the best chance of facilitating institutional investment into affordable housing at scale because it would provide cheaper and longer term finance for community and affordable housing providers, create a market for affordable housing investment, normalising and expanding flows of capital to the industry, address the barriers of return and liquidity and be easily traded in a secondary market thereby providing an attractive low risk financial product.

The Affordable Housing Working Group stressed that the major barrier to affordable housing remained the ‘financing gap’, that is the difference between the rates of return available in affordable housing compared with market rates of return available in other private developments. No innovative financing model will close this gap and a sustained increase in investment by governments is required to stimulate affordable housing production and attract private and financial investment.

## Leveraging finance from families

While family carers of people with disability experience relative socioeconomic disadvantage, some are nevertheless in a position to provide financial assistance by withdrawing equity in their own homes or their superannuation funds[[29]](#footnote-29). A 2012 Australian Institute of Family Studies Report identified that 81% of parent carers over 65 years fully own their homes. Furthermore, 26% and 37% of ageing female and male carers respectively earn family incomes above the Australian median.[[30]](#footnote-30) Wiesel concluded that families with outright ownership of housing and sufficient income allowing for comfortable retirement are potentially able to contribute finance for a family member with disability[[31]](#footnote-31).

### Strategies to leverage finance from families

Shared equity schemes are one way to leverage family equity from such families and can provide NDIS participants with a share of ownership in their own homes, affordable rent and the ability to choose the specific property they wish to purchase. The extension of shared equity schemes should include a process that assists families to manage risks associated with their own reduced equity in planning for their futures.

## Information about availability of accessible housing

It is currently impossible to identify the existing stock of housing with accessibility features because there is no central data repository that is reliable and valid for all Australian states and territories.

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# Appendix A Services consulted in the preparation of this report

## Members of National Disability Services

ACT Eric Thauvette Hartley Lifecare

NSW Anne Bryce Achieve Australia

Q’ld Steve Cairns Ability First

Tasmania Di Gow Uniting (Victoria/Tasmania)

Victoria George Taleporos Summer Foundation

 Christopher Horstmann Housing Choices Australia

 Robin Bradshaw Karingal

 Vicki Hayes & Laurel Edwards OC Connection

 Ross Coverdale Araluen

WA Janet Wagland Brightwater WA

 Sue Shapland MS WA

 Wendy Cox Ability Centre

## Self generated

SA Geoff Barber Julia Farr Housing Association

NT Vicki O’Halloran Summerville

# Appendix B Responsibilities of the NDIS in relation to housing and infrastructure[[32]](#footnote-32)

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| --- |
| APPLIED PRINCIPLES—HOUSING AND COMMUNITY INFRASTRUCTURE |
| * Social housing providers will be responsible for providing accessible accommodation for people in need of housing assistance in line with existing allocation and prioritisation processes, and consistent with universal design principles and livable housing design standards as outlined in the National Disability Strategy 2011-2020, including appropriate and accessible housing for people with disability, routine tenancy support, and ensuring that new publicly-funded housing stock, where the site allows, incorporates Livable Design features.
* Housing and homelessness services will continue to be responsible for homelessness-specific services, including through homelessness prevention, outreach and access to temporary and long term housing for people who are homeless, or at risk of homelessness.
* Parties responsible for community infrastructure will continue to improve the accessibility of the built and natural environment (including roads and footpaths) through planning and regulatory systems and through building modifications and reasonable adjustment where required.
* The NDIS will be responsible for support to assist individuals with disability to live independently in the community, including by building individual capacity to maintain tenancy and support for appropriate behaviour management where this support need is related to the impact of their impairment/s on their functional capacity.
* The NDIS will be responsible for home modifications required due to the impact of a participant’s impairment/s on their functional capacity in private dwellings, in social housing dwellings on a case-by-case basis and not to the extent that it would compromise the responsibility of housing authorities to make reasonable adjustments.
* The NDIS is also responsible for user costs of capital in some situations where a person requires an integrated housing and support model and the cost of the accommodation component exceeds a reasonable contribution from individuals.
* The NDIS and the housing system will work closely together at the local level to plan and coordinate streamlined services for individuals requiring both housing and disability services recognising that both inputs may be required at the same time or through a smooth transition from one to the other.
 |

|  |  |
| --- | --- |
| **Reasonable and necessary supports** **for eligible people** | **Other parties** |
| * Supports that build people’s capacity to live independently in the community, including living skills training, money and household management, social and communication skills and behaviour management, where these are required due to the impact of the person’s impairment/s on their functional capacity.
* Supports to assist a person to obtain and maintain accommodation and/or tenancies where these support needs are required due to the impact of the person’s impairment/s on their functional capacity.
* Reasonable and necessary home modifications to private dwellings and on a case by case basis in social housing where the modifications are additional to reasonable adjustment and specific to the impact of a participant’s impairment/s on their functional capacity.
* User costs of capital in some circumstances, including for disability-specific housing options.
* Working with other parties to facilitate appropriate housing options and improve accommodation choices for people with disability, including through developing partnerships with housing providers and influencing the development of housing options and housing design (not regulation or setting standards in housing design).
* Supports for participants at risk of or experiencing homelessness to support the participant, their families and carers to access and maintain secure and stable accommodation including by accessing housing and homelessness services, where the need for support is due to the impact of the participant’s impairment/s on their functional capacity.
* The coordination of NDIS supports with the housing system and other relevant service systems.
 | * Provision of accessible and affordable accommodation options that meet the needs of people with disability, through social housing within available resources.
* Provision of routine tenancy support by social housing authorities.
* Homelessness-specific services, including homelessness outreach and emergency accommodation.
* Provision of accessible community infrastructure, including modifications to general community amenities.
* Encourage innovative models of affordable and accessible housing investment by private or corporate investors.
* Social housing providers have a duty to make reasonable adjustment in providing accessible housing stock for people with a disability.
* Intensive case coordination operated by the housing or homelessness system where a significant component of the case coordination is related to housing supports.
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# Appendix C Extract from Letter to the Australian Network for Universal Housing Design from Bruce Bonyhady (ex-NDIA Chairman)

Dear [ANUHD staff member]

Thank you for your email about Action to support PFC for accessibility in housing in the National Construction Code - ANUHD & RI Australia. I apologise for not replying sooner.

Firstly may I apologise for not replying sooner to your email. I understand that the Australian Building Codes Board (ABCB) met on 14 July 2016, and that they have deferred the review of the NCC.

In light of this, I would like to provide you with information on where the National Disability Insurance Agency (the Agency) is currently positioned on this topic.

The Agency included guidance on universal design considerations and accessibility requirements in the minimum standards for a newly funded National Disability Insurance Scheme (NDIS) support item, Specialist Disability Accommodation (SDA). SDA refers to accommodation for NDIS participants who require specialist housing solutions to assist with the delivery of supports that cater for their significant functional impairment and/or very high support needs.

During the transition to full scheme, relevant quality, design and safeguard standards for SDA are primarily linked to existing state and Commonwealth legislation; however, the Agency has sought to streamline and influence standards to be nationally consistent through the implementation of the SDA Framework and the Agency’s Terms of Business, to the extent possible.

The Agency recognises that further improvements to the approach and implementation of accessibility standards in the broader housing building codes are important as most NDIS participants will not be eligible for SDA and housing, which is designed to be accessible and much more cost effective than later home modifications

As outlined in my speech to the recent NDIS Griffith Housing Symposium, the agency supports minimum accessibility standards being included in building codes at the Silver Livability Australia standard, on the grounds that the cost is negligible.

For further information contact: [NDIA staff contact details]. Thank you again for your letter.

Yours Sincerely,

Bruce Bonyhady

1. Reflected in the interface principles and the National Disability Strategy [↑](#footnote-ref-1)
2. National Disability Services (2017) *How to get the NDIS back on track,* Accessed at <https://www.nds.org.au/news/how-to-get-the-ndis-on-track-nds-paper-released> 10 July 2017 [↑](#footnote-ref-2)
3. as outlined in Strategies to increase home ownership p17 [↑](#footnote-ref-3)
4. Appendix B provides the names of participants [↑](#footnote-ref-4)
5. Reflected in the interface principles and the National Disability Strategy [↑](#footnote-ref-5)
6. Wiesel, I., & Habibis, D., (2015) *NDIS, housing assistance and choice and control for people with disability* AHURI Final Report no 258 Australian Housing and Urban research Centre, Melbourne <https://www.ahuri.edu.au/research/final-reports/258> Accessed 10 March 2017 [↑](#footnote-ref-6)
7. Not all these people with disability will be NDIS participants [↑](#footnote-ref-7)
8. <http://www.canberratimes.com.au/act-news/canberra-homeshare-program-fear-incompatibility-problems-with-ndis-20170629-gx0z0y> [↑](#footnote-ref-8)
9. for example, 3 people with disability living with 2 people without disability in a formerly 5 bed group home [↑](#footnote-ref-9)
10. <http://www.sbs.com.au/news/dateline/story/my-93-year-old-flatmate> [↑](#footnote-ref-10)
11. National Disability Services (2017) *How to get the NDIS back on track* [↑](#footnote-ref-11)
12. in the Decisions Paper, June 2016 [↑](#footnote-ref-12)
13. Wiesel et al (2015) *Moving to my home: transitions and outcomes of people with disability,* AHURI Final Report No. 246 Melbourne p71. Available from <https://www.ahuri.edu.au/research/final-reports/246> accessed on 10 March 2017 [↑](#footnote-ref-13)
14. A household spending 30 per cent or more of its income can be considered under housing stress. [↑](#footnote-ref-14)
15. Wiesel et al, op cit p68 [↑](#footnote-ref-15)
16. Wiesel et al, op cit p90 [↑](#footnote-ref-16)
17. Wiesel, I., Bullen, J., Fisher, K., Winkler, D. & Reynolds, A., (2017) *Shared home ownership by people with disability* AHURI Final Report No. 278, Australian Housing and Urban Research Institute, Melbourne Accessed <https://www.ahuri.edu.au/__data/assets/pdf_file/0019/12583/AHURI_Final_Report_No277_Shared-home-ownership-by-people-with-disability.pdf> Accessed 13 April 2017 [↑](#footnote-ref-17)
18. Wiesel et al, op cit p54 [↑](#footnote-ref-18)
19. Wiesel et al, op cit p55 [↑](#footnote-ref-19)
20. CHFA, 2014, p7, Connellan 2015, p57 [↑](#footnote-ref-20)
21. Wiesel et al p58 [↑](#footnote-ref-21)
22. Specialist built form is defined as “specific design features or amenity which is not readily supplied through mainstream housing and which involves a significant cost beyond that which would be funded in home modifications” SDA Pricing and Payments Framework at 23. [↑](#footnote-ref-22)
23. Universal design is a philosophical concept with seven (7) principles to guide an approach. Livable Housing Australia guidelines arose out of the National Dialogue on Universal Design (an initiative of the Rudd Government) and represent an attempt to develop a national set of guidelines. As a voluntary approach however, the guidelines lack the rigour of a standard or the legislative framework of a code. The Livable Housing Australia Guidelines are perceived as a positive step toward a national standard that could then be adopted in the NCC. All recognise however that more work is required. [↑](#footnote-ref-23)
24. National Dialogue on Universal Housing Design Strategic Plan 20 Jan. 2010 <https://www.dss.gov.au/sites/default/files/documents/05_2012/national_dialogue_strategic_plan.pdf> Accessed 10 March 2017 [↑](#footnote-ref-24)
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26. Productivity Commission 2004, Reform of Building Regulation, Research Report, Productivity Commission, November Pxxiii <http://www.pc.gov.au/inquiries/completed/building/report/building.pdf> Accessed 10 March 2017 [↑](#footnote-ref-26)
27. Letter from Bruce Bonyhady at Appendix C [↑](#footnote-ref-27)
28. Affordable Housing Working Group (the Working Group) of the Council on Federal Financial Relations (2016) Innovative financing models to improve the supply of affordable housing [↑](#footnote-ref-28)
29. Wiesel, I., & Habibis, D., (2015) *NDIS, housing assistance and choice and control for people with disability* AHURI Final Report no 258 p22 Australian Housing and Urban research Centre, Melbourne <https://www.ahuri.edu.au/research/final-reports/258> Accessed 10 March 2017 [↑](#footnote-ref-29)
30. Qu, L. Edwards, B. & Gray, M., 2012, *Ageing parents of people with disability,* Australian Institute of Family Studies, Canberra [↑](#footnote-ref-30)
31. Wiesel & Habibis 2015 ibid, p22 [↑](#footnote-ref-31)
32. <https://www.coag.gov.au/sites/default/files/communique/NDIS-Principles-to-Determine-Responsibilities-NDIS-and-Other-Service.pdf> [↑](#footnote-ref-32)