

Independent Advisory Council to the NDIS

**Submission to Senate
Standing Committee on
Community Affairs Inquiry
into the delivery of outcomes
under the National Disability
Strategy 2010-2020 to build
inclusive and accessible
communities**

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**Independent
Advisory
Council**
to the **ndis**

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Introduction

Introducing the Independent Advisory Council of the NDIS

Under the ***National Disability Insurance Scheme Act 2013*** (the NDIS Act), the Independent Advisory Council (IAC) has been established to provide advice to the Board on its own initiative or at the written request of the Board about the way in which the National Disability Insurance Agency:

- performs its functions relating to the National Disability Insurance Scheme
- supports the independence and social and economic participation of people with disability;
- provides reasonable and necessary supports, including early intervention supports, for participants in the Scheme launch;
- enables people with disability to exercise choice and control in the pursuit of their goals and the planning and delivery of their supports;
- facilitates the development of a nationally consistent approach to the access to, and the planning and funding of, supports for people with disability;
- promotes the provision of high-quality and innovative supports to people with disability
- raises community awareness of the issues that affect the social and economic participation of people with disability and helps with greater community inclusion of people with disability.

In providing advice, the IAC considers the role of families, carers and other significant persons in the lives of people with disability.

The IAC consists of up to 12 members and a principal member, appointed to reflect the diversity of people with disability.

Scope of this submission

This submission to the Senate Standing Committees on Community Affairs Inquiry into the delivery of outcomes under the National Disability Strategy 2010-2020 (the Strategy) to build inclusive and accessible communities focuses on housing and

transport with particular emphasis on the impact on people with disability and their families and the National Disability Insurance Scheme (NDIS).

Our submission therefore relates to:

Policy Outcome 1 of the Strategy: “People with disability live in accessible and well designed communities with opportunity for full inclusion in social, economic, sporting and cultural life”. In particular, this submissions focuses on:

- ❖ **Universal design**
- ❖ **Housing Policy Direction 3**—“Improved provision of accessible and well designed housing with choice for people with disability about where they live”.
- ❖ **Transport Policy Direction 4**—“A public, private and community transport system that is accessible for the whole community”.

The submission addresses:

1. The potential barriers to progress or innovation and how these might be addressed;
2. The impact of restricted access for people with disability on their inclusion and participation in economic, cultural, social, civil and political life. In particular, the submission focuses on the extent to which lack of progress:
 - creates dependence in people with disability;
 - reduces the opportunities for people with disability and their families to be more independent, more engaged socially and economically and more included in their communities;
 - forces people with disability into congregate services;
 - creates increased demand for Specialist Disability Accommodation (SDA);
 - creates increased financial pressures on the NDIS; and
3. Any other related matters.

Recommendations of the IAC

The adoption of universal design principles in all activities is the foundation for building inclusive and accessible communities. This is a shared responsibility among government, business and community. We must anticipate and respect diversity, then mainstream diversity with universal design.

Universal design

- The Australian Government should take a whole-of-government approach to awareness and procurement of universally designed community resources, built environments and transport, similar to the Norwegian Government¹.
- The Australian Government funding the development of Universal Design Guidelines for planners and developers across all spaces and places,
- A practical first step might be to provide seeding grants to industry and community initiatives such as Livable Housing Australia² and the newly established Centre for Universal Design Australia³.

Housing

- To reach the National Dialogue's 2020 target, the Australian Government should direct the Australian Building Codes Board to provide minimum accessibility (Silver Level⁴) in all new and extensively modified housing in the National Construction Code in 2019.
- The Australian, State and Territory Governments should ensure all social housing is built to be fully accessible (Gold Level⁴).
- The Australian Government should support a voluntary education and awareness program for universally designed housing, such as Livable Housing Australia².
- Affordable rental programs should require accessibility. Funding Round 5 in 2013 for the National Rental Affordability Scheme gave priority to projects that provided Gold level access⁵; however, this funding round did not proceed.

Transport

Improved progress against the Disability Standards for Accessible Public Transport (DSAPT) will require:

- amendment of the DDA to provide a more flexible response to cover the different modes of public transport and the different environments in which public transport networks operate across jurisdictions.
- establishment of a national framework for reporting on progress against the Transport Standards
- amendment to the complaints process to be less burdensome for the complainant.

In particular, there should be:

- national compliance for milestones and response times for wheelchair accessible taxis;
- equitable access to Uber transport;
- consistency in policy by all national airline carriers for the transport of people with wheelchairs.
- dedicated funding support for people who use mobility aids that are not covered by the standard.

For people who cannot use public transport:

- Taxi subsidy schemes should remain a State and Territory funded entitlement; and
- A flexible and affordable community transport service should be available.

Other matters

The IAC encourages the Senate Standing Committee on Community Affairs to inquire into all outcome commitments under the National Disability Strategy. Through its networks, roving visits and connection to people with disability nation wide, the IAC will be able to present evidence of the impact of the lack of achievement of National Disability Strategy outcomes on people with disability and the NDIS in the areas of rights protection, economic security, learning and skills and health and wellbeing.

The IAC believes that progress in implementing the National Disability Strategy has been weak as a result of a lack of leadership from government and a lack of genuine co-design with people with disability who experience the impacts of lack of action.

Genuine commitment by government would be reflected in key performance measures of the head of the relevant government departments including the use of reference groups reporting to senior management.

Universal Design

Our submission relates to the overall commitment in **Policy Outcome 1** to the adoption of universal design:

“A key first step in removing these barriers is to incorporate universal design into the design and build of community resources, from parks to houses, to shopping centres and sporting arenas⁶.”

Areas for future action in the Strategy

1.6 Improve community awareness of the benefits of universal design.

1.7 Promote universal design principles in procurement.

Actual progress achieved

Victoria has a universal design awareness strategy, launched in September 2014⁷. The South Australian *Planning Development and Infrastructure Act 2016* requires developers and planners to ‘seriously consider’ universal design. Universal design is the basis of thinking for most State initiatives for accessible housing.

Activities to promote universal design are however omitted from the 2015-2018 NDS Implementation Plan⁸.

The impact of restricted access for people with disability

The sustainability of the NDIS is contingent on mainstream services and facilities becoming more accessible and inclusive of everyone⁹. Without this whole of government approach, the demand for “reasonable and necessary supports” will increase, and people with disability will be unable to maximise outcomes of their plans for economic and social inclusion¹⁰.

Some examples where exclusive design impacts on people with disability are:

- playgrounds which do not consider the needs of children with disability;
- holiday short-term rental apartments (typically Class 2 dwellings) which do not have accessible units;
- websites that do not cater for people with vision impairment or cognitive disability; and
- public toilets that do not provide change facilities for adults
- change rooms in retail stores inhibit people from trying on clothes
- entertainment areas prevent participation.

The potential barriers to progress or innovation

The concept of universal design has minimal potential barriers; it is a concept that has been supported world-wide since 1985^{11,12}.

How these might be addressed

The adoption of universal design principles in all activities is the foundation for building inclusive and accessible communities that anticipate and respect diversity. This is a shared responsibility among government, business and community. Steps to promote the adoption of universal design principles include:

- the Australian Government should take a whole-of-government approach to awareness and procurement of universally designed community resources, built environments and transport, similar to the Norwegian Government¹,
- the Australian Government funding the development of Universal Design Guidelines for planners and developers across all spaces and places,
- a practical first step might be to provide a seeding grants to industry and community initiatives, such as Livable Housing Australia² and the newly established Centre for Universal Design Australia³

Other impacts on people with disability and their families and the NDIS

A widespread understanding and adoption of universal design in all areas of government would truly include people with disability and their families. It would enable

people with disability to feel confident that they could join with their family and friends in all aspects of life that others take for granted.

Without universal design, the NDIS will be called upon to provide support to participants who could participate independently in an accessible inclusive community. These increased costs will have a negative impact on the sustainability of the NDIS.

Housing

Our submission relates to:

Policy Outcome 1 of the Strategy is described as follows: “*People with disability live in accessible and well designed communities with opportunity for full inclusion in social, economic, sporting and cultural life*”.

Housing Policy Direction 3—“*Improved provision of accessible and well designed housing with choice for people with disability about where they live*”.

Current commitments 2010

- Improved accessibility in social housing is being achieved through the incorporation of universal design elements in more than 15,000 new public and community housing dwellings which are being built under the social housing component of the Nation Building—Economic Stimulus plan. Funding provided through the Social housing Initiative will support the inclusion of six specified universal design features in these dwellings that will provide improved access to people who have limited mobility. Of these, more than 5,000 dwellings will also achieve an even higher level of adaptability through compliance with the Australian Standard for Adaptable housing Class C (See **Error! Reference source not found.**).
- The Australian Government is working with representatives from all levels of government, key stakeholders from the disability, ageing and community support sectors and the residential building and property industry on the National Dialogue on Universal Design (National Dialogue) to ensure that housing is designed and developed to be more accessible and adaptable. An aspirational target that all new homes will be of agreed universal design standards by 2020 has been set, with interim targets and earlier completion dates to be determined (See Appendix 2: Targets and description of the National Dialogue).

Areas for future action in the Strategy

- 1.5 All levels of government develop approaches to increase the provision of universal design in public and private housing in both new builds and modification of existing stock.

Progress one should have been able to expect to date

- All dwellings funded under the Nation Building Economic Stimulus should have six specified universal design features, with 20% providing the higher standard of AS4299-1995.
- By 2017, the National Dialogue on Universal Housing Design agreement¹³ should have resulted in a minimum of 110,000 new private dwellings¹⁴ to the agreed universal design standard (Silver Level⁴) this financial year, with a legacy of an increasing number of accessible dwellings each year since 2010.
- All State Governments should have improved the supply of accessible social and private housing by legislation, incentives or industry and community awareness.

Actual progress achieved

More than 19 500 net new dwellings were delivered nationally by June 2012, representing an increase of 5.5 per cent in overall social housing stock¹⁵. A review in 2012 found that access requirements were delivered in 96 per cent of all projects¹⁶. The six specified universal design features, however, did not require an accessible entry or a toilet that can be used by people with a mobility aid¹⁷. These omissions precluded many people with mobility difficulties residing in this housing without modification and evidence the lack of knowledge and understanding by policy makers and the housing industry of the consequences of poorly considered standards.

Livable Housing Australia (LHA) was established in 2012 to implement the National Dialogue's agreement. By 2014 LHA had issued over 350 provisional certificates (not built) across Australia for projects that comply with the Silver, Gold or Platinum Levels outlined in the Livable Housing Design (LHD) Guidelines. LHA has issued 55 as-built certificates. 54 of these were Platinum level as a requisite for Commonwealth funding, with only one silver level dwelling across Australia. There are over 2050 other projects that have registered but had not received certification at that time.

310 projects used the LHA self-assessment portal since it was launched in July 2014. LHA have identified 2600 other dwellings that publicly claim to have been designed or built to at least the Silver level of the LHD Guidelines but are not currently registered for certification from LHA. LHA estimated that 4000 social and affordable dwellings (either built or proposed) were identified from 2012-2014 to meet at least the Silver level. No figures are available since the closure of the LHA office in December 2014.

No formal review of the outcomes of the National Dialogue agreement has been done by the Australian Government or housing industry, in spite of a commitment to review the outcomes every two years. An alternative community review of the progress of the National Dialogue agreement anticipates less than 5% of the 2020 target will be reached¹⁸. (See *Figure 1*

reproduced with permission from the Australian Network on Universal Housing Design (ANUHD))

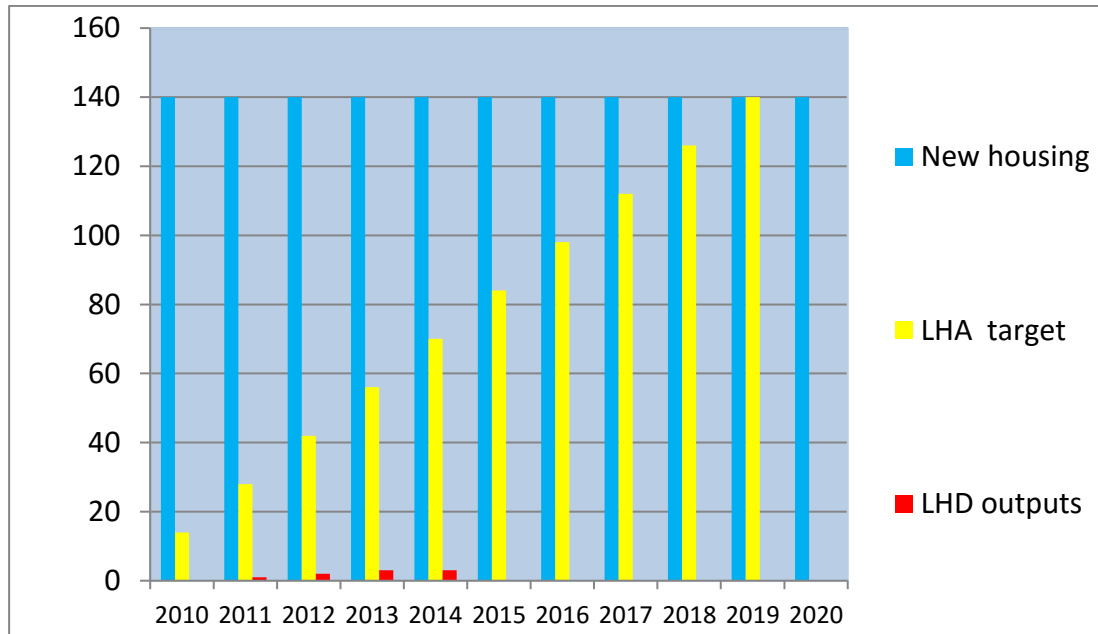


FIGURE 1: COMPARISON OF ACTUAL OUTPUTS WITH AGREED NATIONAL TARGETS¹⁶

ACT¹⁹ and Victorian²⁰ governments attempted to legislate to improve the supply of accessible housing, but succumbed to adverse response from the housing industry. Websites for Australian Government²¹, and State Governments in Victoria²², Western Australia²³, and Queensland²⁴ provide information on accessible housing. Various guidelines have been developed across Australia for specific regions and cohorts.

The State and Territory housing authorities have adopted various standards of accessibility in social and affordable housing¹⁸ (See Appendix 3: Guidelines used by State and Territories). There is no reliable data on the supply of accessible social housing, although, in 2014, 42% of newly-constructed social housing is allocated to people with disability²⁵.

Some exceptions to this pattern are emerging. Grocon committed to provide Silver level in all housing developments, over which they have full control⁴⁵. The Parklands Commonwealth Games village is their showcase with all apartments providing Gold level and townhouses, silver level⁴⁶.

The impact of restricted access for people with disability

The lack of accessible housing exacerbates the marginalisation and dependence of people with disability on carers, support agencies and the State²⁶⁻²⁸ with impacts that can be most profound to the health and wellbeing of the person and those who support them. In particular:

- households incur extra costs through necessary home modifications and equipment often at a time when they can least afford them. Modifying a dwelling typically costs 19 times more than including access features when it is constructed²⁰.
- households with a member with disability are often unable to visit other people's homes and to take part and contribute to community and family activities.
- people with disability are currently over-represented in specialist (nursing homes, group homes, hostels) and social housing²⁵, in part, because this housing is more likely to be affordable and accessible²⁹. These already stretched housing options will be further burdened as the NDIS is implemented³⁰.
- age appropriate milestones are missed as young people with disability are prevented from moving into their own homes in a timely age appropriate way
- families are separated when people with acquired disability are prevented from returning to family and community
- inaccessible housing impacts on health services through increased slips, trips and falls³¹, and avoidable hospital stays³², inefficient use of home-based support³³ and a resultant demand for specialist residential facilities³⁴.

The potential barriers to progress or innovation

Government reliance on a market-driven strategy to increase supply is a major barrier. This is because people who need accessible housing are not the main buyers of new housing^{35,36} and buyers of new housing are unlikely to request accessible features that they do not think they will need^{37,38}. The small numbers of people who need accessible housing and can afford a new home face an indifferent housing industry³⁹.

Most housing is built speculatively with capacity only for some minor cosmetic changes within set designs⁴⁰. (The main design decisions are made long before the buyer is identified.) Builders avoid changes to mainstream practice because there are risks in time-delays and unexpected costs; and there are knock-on consequences for related trades and suppliers³⁹. The Productivity Commission acknowledges these barriers by reporting that, "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"⁴¹.

The private rental market also has little incentive to provide accessible housing. Under the *Disability Discrimination Act 1992* tenants have the right to modify a rental property within reason; however, they are obliged to remove the modifications at the end of their tenure. With tenancy agreements often less than a year, households with a member with disability are unwilling to make this financial commitment without extended tenure, and landlords have been found to be reluctant to agree to modifications to make the dwelling more accessible, even though they are not obliged to pay for them^{35,42}.

How these might be addressed

- To reach the National Dialogue’s 2020 target, the Australian Government should direct the Australian Building Codes Board to provide minimum accessibility (Silver Level⁴) in all new and extensively modified housing in the National Construction Code in 2019.
- The Australian, State and Territory Governments should ensure all social housing is built to be fully accessible (Gold Level⁴).
- The Australian Government should support a voluntary education and awareness program for universally designed housing, such as Livable Housing Australia².
- Affordable rental programs should require accessibility. Funding Round 5 in 2013 for the National Rental Affordability Scheme gave priority to projects that provided Gold level access⁵; however, this funding round did not proceed.

Other impacts on people with disability and their families and the NDIS

Without regulation, households with a member with disability are at the mercy of the private housing industry. Residential builders have little incentive to provide universally designed housing. When existing housing needs to be modified, the housing industry effectively has a second opportunity for business. Families and government programs, including the NDIS, both fund home modifications and assistive technology that could be avoided if the dwellings had been well-designed in the first place. The NDIS and the States and Territories have already agreed to their respective responsibilities with regard to housing and community infrastructure. (See Appendix 4: Responsibilities of the NDIS and housing and infrastructure.) People with disability and their families will suffer negative impacts if this agreement is not met, and the NDIS will be at risk of not being sustainable in the long term.

Transport

Our submission relates to:

Policy Outcome 1 of the Strategy is described as follows: “People with disability live in accessible and well designed communities with opportunity for full inclusion in social, economic, sporting and cultural life”.

Transport Policy Direction 4—“A public, private and community transport system that is accessible for the whole community”.

Current commitments 2010

- The Commonwealth, States and Territories are collaborating to develop the Australian Disability Parking Scheme that will introduce a new nationally recognised Australian Disability parking permit to replace over 100 permits currently in use across Australia. The scheme will increase opportunities for independence and the social inclusion of people with disability, particularly those who have limited access to alternative transport options.
- States and Territories are implementing the Disability Standards for Accessible Public Transport 2002 (DSAPT) to remove discrimination in providing public transport for people with disability and assist them to fully participate in community life. The Commonwealth will be releasing a response to the review of these standards.

Areas for future action in the Strategy

- 1.3 Monitor adherence to and evaluate the effectiveness of the Disability (Access to Premises – Buildings) Standards 2010 and Disability Standards for Accessible Public Transport 2002 and improve the accessibility of reports.
- 1.4 Promote the development of Disability Access facilitation plans by airlines and airport operators to improve communication between operators and passengers with disability.

Actual progress achieved

- The Australian Disability Parking Scheme is now established.
- Progress against the DSAPT, enacted in 2002 is reviewed every five years (2007, 2012, and 2017). The 2007 review indicated limited progress. Only three of the ten recommendations were implemented by the next review in 2012. The 2012 review suggested that progress against the DSAPT is occurring at an uneven rate depending on the location, population and demand for accessible public transport; with acknowledgement that the States were now making a concerted effort. Private

operators were struggling to update their fleets and associated infrastructure out of their own funds.

- The exception to this variable progress is the accessibility of buses. Because they are renewed every 10-12 years, the targets for accessible buses are being met. There remain some design problems for people in larger mobility vehicles, including scooters.

The impact of restricted access for people with disability

There has been no improvement in the labour-force participation rate by people with disability since the ABS last conducted the survey of disability ageing and carers (SDAC) in 2009. The 2012 SDAC also shows that just over 50 per cent of people with disability aged between 15 and 64 were participating in the labour force in 2012, compared with 80 per cent of people without disability⁴³.

The lack of affordable and accessible transport also contributes to disabled people's marginalization and dependency on carers, support agencies and the State^{26,27}. People remain at home with ageing parents because of the lack of affordable and accessible alternatives. The lack of mobility in the community diminishes their developing independence, capacity to work, learn, build and maintain relationships, and to contribute both socially and economically²⁸.

In addition, evidence presented to the Intellectual Disability Reference Group of the IAC suggests that the lack of accessible transport promotes dependence on paid staff and parents thwarting opportunities for people to be independent contributing citizens.

The potential barriers to progress or innovation

This uneven progress is due to:

- the lack of agreement between jurisdictions, transport providers and the disability sector on the adequacy or otherwise of existing services, the technical challenges posed by some of the Transport Standards and/or a lack of funding.
- the inadequacy of the current self-assessment processes. While government-contracted operators generally report on compliance, there is currently no requirement for private operators to report progress unless it is required as part of the DDA complaints process.
- the complaints process through the DDA as only way of ensuring that non-compliance is addressed.

In particular:

- accessible taxis vary in design and response times considerably across Australia;
- questions regarding Uber transport's status and compliance as a form of public transport;
- variations on how people in wheelchairs are transported by budget airlines;

- dedicated funding support for people who use mobility aids that are not covered by the standard.

Currently the implementation of the NDIS in some areas has resulted in the withdrawal of the taxi subsidy scheme. This appears to be a cost-shift to the NDIS of responsibilities of the State to provide an equitable public transport system. It also requires NDIS participants to plan their transport needs for the year.

How these might be addressed

Improved progress against the DSAPT will require:

- amendment of the DDA to provide a more flexible response to cover the different modes of public transport and the different environments in which public transport networks operate across jurisdictions;
- establishment of a national framework for reporting on progress against the Transport Standards;
- improving the complaints process to be less burdensome for the complainant.

In particular:

- there should be national compliance for milestones and response times for wheelchair accessible taxis;
- equitable access to Uber transport;
- consistency in policy by all national airline carriers for the transport of people with wheelchairs;
- dedicated funding support for people who use mobility aids in the 10th percentile.

For people who cannot use public transport:

- taxi subsidy schemes should remain a State funded entitlement; and
- a flexible and affordable community transport service should be available.

Other impacts on people with disability and their families and the NDIS

The NDIS and the States and Territories have already agreed to their respective responsibilities with regard to transport. (See Appendix 5: Responsibilities of the NDIS and transport.) People with disability and their families will suffer negative impacts if this agreement is not met, and the NDIS will be at risk of not being sustainable in the long term.

Appendices

Appendix 1: Universal Design requirements

Social Housing initiative Element 1 New Construction of the Nation Building Economic Stimulus Plan¹⁷

New dwellings funded under this program were required, where possible, to incorporate the following minimum universal design elements to make properties more accessible to people who are ageing or live with disabilities:

1. Installation of grab rails in bathrooms and toilets or the incorporation of reinforced wall framing to allow future installation.
2. Hobless/step free shower recess (threshold less than 5mm in height or bevelled edges) and adjustable/detachable hand held shower rose.
3. Internal doorways on the entrance level having a minimum clear opening of 820mm and minimum corridors of 1000mm or wider clear of fixtures.
4. A bench area in the kitchen that adjoins the oven and cook top to allow easy placement of hot pots and pans and includes a power point within 300mm of the front of the bench.
5. Door handles to be lever style and tap hardware to be lever or flick mixer style.
6. Light switches to be located near doorways at a height between 900mm and 1100mm and if possible large format style.

Note: There is no requirement for access into the dwelling or for a toilet that can cater for a mobility aid.

Additional Requirements

In addition to these minimum requirements projects were required to achieve a higher level of adaptability in 20 per cent of the dwellings. These dwellings had to meet the Australian Standard for Adaptable Housing AS4299-1995 Class C⁴⁴.

Appendix 2: Targets and description of the National Dialogue

The National Dialogue on Universal Housing Design (National Dialogue) proposed a 10-year timeframe for the implementation of this Strategic Plan¹³, with the aspirational target being that all new homes will be of an agreed Universal Housing Design standard (Silver level) by 2020⁴.

The agreed interim targets for voluntary uptake of the Guidelines for all new residential housing are:

- 25 per cent to Silver level by 2013
- 50 per cent to Silver level by 2015
- 75 per cent to Silver level by 2018
- 100 per cent to Silver level by 2020

The targets proposed for the uptake of the Guidelines by the Commonwealth, States and Territories are:

- 100 per cent to Silver level by 2011
- 50 per cent to Gold level by 2014
- 75 per cent to Gold level by 2017
- 100 per cent to Gold level by 2019

The members of the National Dialogue were:

- Australian Human Rights Commission
- Australian Institute of Architects
- Australian Local Government Association
- Australian Network for Universal Housing Design
- COTA Australia • Grocon • Housing Industry Association
- Lend Lease
- Master Builders Australia
- National People with Disabilities and Carers Council
- Office of the Disability Council of NSW
- Property Council of Australia
- Real Estate Institute of Australia
- Stockland

Appendix 3: Guidelines used by State and Territories

Taken from ANUHD/RIA survey of State and Territory Ministers December 2014¹⁸

State Guideline for accessible housing

QLD The Department's procurement and design requirements for new apartments and houses including houses in remote Indigenous communities, reference the Livable Housing Design Guidelines 'Gold' and 'Platinum' levels.

The Department requires proposals for apartment projects to maximise the number of ground-floor and lift-served apartments designed to the LHD guidelines. Up to 30% of social housing apartments in new multi-unit projects are required to meet the Platinum level, with all remaining ground-floor and lift-served apartments designed to Gold level. The minimum standard for houses is Gold level, with the Platinum standard specified for projects in response to identified client need.

NSW NSW aims to achieve a minimum of 50 percent of new dwellings designed with liveable housing features. The Liveable Housing standards (*sic.*) are included in the LAHC Design Standards and exceed "Gold" level of the Livable Housing Australia's *Livable Design Guidelines*.

VIC Did not respond.

SA It is estimated that 90% of homes constructed for Housing SA currently meet [SA Universal Housing Design] criteria.

- Housing SA's current position for newly constructed housing is of a standard comparable with Silver and Gold levels of the NLHDG targets.
- Housing SA Disability Housing which is focused on providing for the specific needs of the occupants, almost comprehensively meets the Platinum standard.

TAS In 2012 Tasmanian Department of Health and Human Services formally adopted a new policy for new social housing developed by Housing Tasmania. This includes, where appropriate, affordable housing projects undertaken by the not for profit sector with Tasmanian Government support.

The fifth objective of this policy was to establish the Liveable [*sic*] Housing Design Guidelines and universal housing design principles as a minimum standard for all new developments.

WA Western Australia has not committed to the National Dialogue's proposed targets. Western Australia incorporates universal design principles in a number not specified) of its building and construction programs.

State Guideline for accessible housing

Between 2009-2010 and 2013-2014 more than 2,000 completed dwellings funded through the department have incorporated “substantial elements” of universal housing design

ACT Housing ACT has constructed 73% of its new properties to a Class C standard [AS4299] with the remaining 27% to Gold Standard under the Liveable [*sic*] Housing Guidelines”.

NT The Department has incorporated universal design features in its requirements and it promotes core universal design features similar to those described in the Liveable [*sic*] Housing Design Guidelines.

Decision regarding the use of the Australian Standard AS 4299 Adaptable Housing are made on a case by case basis

Appendix 4: Responsibilities of the NDIS and housing and infrastructure.

Taken from the Principles to determine the responsibilities of the NDIS and other service systems⁹

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

- 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.

Other parties

- 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.

Appendix 5: Responsibilities of the NDIS and transport.

Taken from the Principles to determine the responsibilities of the NDIS and other service systems⁹

Applied Principles - Transport

- The public transport system will be responsible for ensuring that transport options are accessible to people with disability, including through concessions to people with disability to use public transport (including parties choosing to provide concessions for the total cost of transport) and compliance with relevant non-discrimination legislation including the Disability Standards for Accessible Public Transport.
- Others parties will continue to be responsible for transport infrastructure, including road and footpath infrastructure, where this is part of a universal service obligation or reasonable adjustment, including managing disability parking and related initiatives.
- The NDIS will be responsible for funding supports for individuals that enable independent travel, including through personal transport-related aids and equipment, training to use public transport and modifications to private vehicles (i.e. not modifications to public transport or taxis).
- The NDIS will be responsible for reasonable and necessary costs associated with the use of taxis or other private transport options for those not able to travel independently.

Reasonable and necessary supports for eligible people	Other parties
<p>Training and support to use public transport where public transport is a viable option for the participant and the person's mobility device(s) can be used.</p> <ul style="list-style-type: none"> • Modifications to private vehicles and driver assessment and training. <p>Costs associated with innovative transport options for people who cannot travel independently or use public transport due to the impact of their impairment/s on their functional capacity</p>	<ul style="list-style-type: none"> • Accessible public transport. • Concessions to facilitate use of public transport, including where a full concession is offered. • Community transport services. • Modifications to public transport and taxis.

References

- Norwegian Ministry of Children and Equality. Norway universally designed by 2025: The Norwegian government's action plan for universal design and increased accessibility 2009-2013. In: Norwegian Ministry of Children and Equality, ed. Oslo: Norwegian Ministry of Children and Equality.
2. Livable Housing Australia. Home Page. 2012; <http://www.livablehousingaustralia.org.au/59/about-lha.aspx>.
 3. Centre for Universal Design Australia. Home Page. 2016; <http://universaldesignaustralia.net.au/>.
 4. NDUHD. Livable housing design guidelines. 2010; http://www.fahcsia.gov.au/sa/housing/pubs/housing/Documents/universal_housing_design.pdf. Accessed July 22, 2010.
 5. Livable Housing Australia. NRAS Applicant and Participant Information. Livable Housing Australia; 2013.
 6. COAG. 2010–2020 National Disability Strategy: An initiative of the Council of Australian Governments. Canberra: Australian Government,; 2011.
 7. Victorian Government. Universal Design. 2015; https://www.youtube.com/watch?v=i5-iBnSS_wM.
 8. Department of Social Services. *National Disability Strategy: Second implementation plan-Driving Action 2015-2018*. Canberra2016.
 9. NDIS. Principles to determine the responsibilities of the NDIS and other service systems. In: National Disability Insurance Agency, ed. Canberra: National Disability Insurance Agency; 2015.
 10. NDIA. Towards an ordinary life: Annual Report 2015-2016. In: Agency NDI, ed. Canberra2016.
 11. Mace R. Universal design: Barrier free environments for everyone. *Designers West*. 1985;33(1):147-152.
 12. Steinfeld E, Maisel J. *Universal Design: Creating inclusive environments*. New York: Wiley; 2012.
 13. NDUHD. Strategic plan. 2010; https://www.dss.gov.au/sites/default/files/documents/05_2012/national_dialogue_strategic_plan.pdf. Accessed January 20, 2015.

14. National Housing Supply Council. Housing Supply and Affordability Issues 2012–13. In: Treasury T, ed. Canberra: Commonwealth of Australia; 2013.
15. Murray S. *Design innovations delivered under the Nation Building Economic Stimulus Plan-Social Housing Initiative*. Monash University: Australian Housing and Urban Research Institute;2013.
16. KPMG. *Social housing initiative review, report commissioned by the Housing Ministers' Advisory Committee*. 2012.
17. Australian Government. Social housing initiative guidelines: Element 1-new construction. *Nation Building Economic Stimulus Plan*. Canberra2009.
18. Australian Network for Universal Housing Design and RI Australia. Report on the progress of the National Dialogue on Universal Housing Design 2010-2014. Sydney2015.
19. ACT Government. Consultation on implementing universal design guidelines in the Act: Project background and status. 30 July 2013 Meeting summary 2013.
20. Victorian Government. Accessible Housing: Public consultation on the visitable and adaptable features in housing regulatory impact statement. 2010; <http://www.qauhd.org/sites/default/files/RISvictoria.pdf>. Accessed June 18, 2014.
21. Australian Government. Design for Life. 2008; <http://www.yourhome.gov.au/technical/index.html>.
22. Victorian Building Commission. Build for life. 2009; <http://www.buildingcommission.com.au/www/html/2218-build-for-life.asp>. Accessed January 9, 2011.
23. Government of Western Australia. Liveable homes: designs that work for everyone. 2011; <http://www.liveablehomes.net.au/>. Accessed February 27, 2012.
24. Department of Public Works. *Smart and sustainable homes design objectives*. Brisbane: Queensland Government; 2008.
25. AIHW. *Housing assistance in Australia 2014*. Canberra: Australian Government;2014.
26. Saugeres L. (Un)accommodating disabilities: housing, marginalization and dependency in Australia. *Journal of Housing and the Built Environment*. 2010;26(1):1-15.
27. Beer A, Faulkner D. *The housing careers of people with a disability and carers of people with a disability* Southern Research Centre, Adelaide: Australian Housing and Urban Research Institute;2008.

28. Chenoweth L, Stehlik D. Implications of social capital for the inclusion of people with disabilities and families in community life. *International Journal of Inclusive Education*. 2004;8(1):59-72.
29. Disability Discrimination Act, (1992).
30. Wiesel I, Laragy C, Gendera S, et al. *Moving to my home: housing aspirations, transitions and outcomes of people with disability*. University of New South Wales, RMIT University 2015.
31. Ozanne-Smith J, Guy J, Kelly M, Clapperton A. The relationship between slips, trips and falls and the design and construction of buildings. 2008; <http://www.monash.edu.au/muarc/reports/muarc281.html>. Accessed July 20, 2010.
32. Granbom M, Iwarsson S, Kylberg M, Pettersson C, Slaug B. A public health perspective to environmental barriers and accessibility problems for senior citizens living in ordinary housing. *BMC Public Health*. 2016;16(772):1-11.
33. Carnemolla P, Bridge C. Home Modifications and their impact on waged care substitution. *Home Modification Information Clearinghouse*. Sydney: University of NSW; 2011.
34. Winkler D, Callaway L, Guthrie S. *National Disability Insurance Scheme launch sites: Projection of the number of young people in Residential Aged Care*. Sydney NSW & Melbourne, Victoria: PWC & Summer Foundation Limited; 2013.
35. Beer A, Faulkner D. 21st century housing careers and Australia's housing future. *AHURI Final Report No. 128*. 2009; http://www.ahuri.edu.au/nrv/nrv2/NRV2_Assoc_Docs.html. Accessed July 21, 2010.
36. Judd B, Liu E, Easthope H, Davy L, Bridge C. *Downsizing amongst older Australians*. Melbourne 2014.
37. Crabtree L, Hes D. Sustainability uptake in housing in metropolitan Australia: An institutional problem, not a technological one. *Housing Studies*. 2009;24(2):203-224.
38. Spanbroek N, Karol E. Ageing at home-are we prepared? Paper presented at: The 2nd International Conference for Universal Design; October 23-25, 2006; Kyoto, Japan.
39. Bringolf J. Barriers to universal design in housing. *Urban Research Centre, College of Health and Science*. [(Doctoral dissertation)]. 2011; <http://handle.uws.edu.au:8081/1959.7/506910>. Accessed September 16, 2012.
40. Dalton T, Wakefield R, Horne R. *Australian suburban house building: industry organisation, practices and constraints*. Melbourne 2011.

41. Productivity Commission. Reform of building regulation. 2004; <http://129.3.20.41/eps/othr/papers/0506/0506007.pdf>. Accessed July 24, 2010.
42. Jones A, de Jonge D, Phillips R. *The role of home maintenance and modification services in achieving health, community care and housing outcomes in later life*. Brisbane 2008. 123.
43. Australian Government. Review of the Disability Standards for Accessible Public Transport 2002: Final Report. In: Department of Infrastructure and Regional Development, ed. Canberra: Commonwealth of Australia; 2015.
44. Standards Australia. Adaptable housing. AS4299. Sydney: Standards Australia; 1995.
45. Grocon commits to LHA Livability Guidelines [press release]. 2014.
46. Queensland Government. Commonwealth Games Village. 2017; <http://statedevelopment.qld.gov.au/major-projects/commonwealth-games-village.html>. Accessed Feb 20, 2017