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**Registration and Accreditation Scheme**

**A submission in response to the Registration and Accreditation Scheme for the Victorian disability workforce consultation paper as distributed by the State Government of Victoria**

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# **About YDAS**

The Youth Disability Advocacy Service (YDAS) is a state-wide advocacy service for young people with disability in Victoria, offering a free individual advocacy service to young people aged 12 to 25 who have disability.

YDAS is a core agency of the Youth Affairs Council Victoria, the state’s youth peak body. YDAS is guided by a Steering Committee who are predominantly young people with disability aged 12 to 25.

# **About YACVic**

The Youth Affairs Council Victoria (YACVic) is the peak body and leading policy advocate on young people’s issues in Victoria. YACVic’s vision is that young Victorians have their rights upheld and are valued as active participants in their communities.

YACVic is an independent, not-for-profit, member-driven organisation that represents young people (aged 12-25 years) and the sector that works with them. Through our research, advocacy and services, we:

* lead policy responses on issues affecting young people
* represent the youth sector and elevate young people’s voices to government
* resource high-quality youth work practice

We are driven by our members and prioritise their needs and concerns.

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# **1. Introductory Comments**

The Youth Disability Advocacy Service (YDAS) welcomes the opportunity to comment on the proposed Registration and Accreditation Scheme. YDAS represents young people with disability and assists them in the protection and realisation of their rights under the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD). In the case of the proposed framework YDAS recognises that it is important to balance a number of obligations under the CRPD; balancing freedom from exploitation, violence and abuse with maintaining individual autonomy, freedom of choice and the dignity of risk.

*Article 16*

*States Parties shall also take all appropriate measures to prevent all forms of exploitation, violence and abuse by ensuring, inter alia, appropriate forms of gender- and age-sensitive assistance and support for persons with disabilities and their families and caregivers, including through the provision of information and education on how to avoid, recognize and report instances of exploitation, violence and abuse. States Parties shall ensure that protection services are age-, gender- and disability-sensitive.*

*Article 17*

*Every person with disabilities has a right to respect for his or her physical and mental integrity on an equal basis with others.*

*Preamble*

*(n) Recognizing the importance for persons with disabilities of their individual autonomy and independence, including the freedom to make their own choices, (UNHCR 2006)*

This should in turn be balanced not only with the UN CRPD articles outlined above, but also by the principles of the NDIS Act 2013 which states:

*People with disability should be supported to exercise choice, including in relation to taking reasonable risks, in the pursuit of their goals and the planning and delivery of their supports.” (NDIS Act 2013)*

YDAS supports a Registration and Accreditation Scheme that adopts a human rights framework, insofar as the scheme serves to establish, promote and protect the rights of individuals with disability. This should be focused on showcasing the importance of bodily autonomy and the preservation of choice and control. YDAS recognises the importance of preventing abuse and neglect and fully supports the Victorian Government’s ‘Zero Tolerance’ platform. However, policy should continue to balance all aims of the CRPD, as well as the principles of the NDIS Act, which refer specifically to supporting people with disability to take ‘reasonable risks’ (NDIS Act 2013).

Maintaining this balance between protective measures and choice and control is a key consideration in all of our work, including individual advocacy. While our individual advocacy work focuses on giving young people choice and control to the maximum extent possible, it also provides us with insight into the circumstances where young people may be less empowered, supported and visible than their peers, such as young people with disability in out of home care. Although YDAS strongly advocates for all young people with disability to be empowered, supported and made visible, we also acknowledge that minimal immediate protections can make a big difference in some circumstances.

This submission is informed by consultation undertaken with both the YDAS Steering Committee as well as the wider community of young people with disability, including YDAS advocacy clients who are already participants of the NDIS. Within this group of advocacy clients YDAS has observed a wide range of levels of capacity, need for support and parental involvement. It has been the experience of YDAS that these elements, which often impact risk and the assumption of choice and control, can vary greatly over time.

*Leon is an 18-year-old young person with cerebral palsy. Having recently transitioned onto the NDIS Leon is excited to be finally able to go on holiday without his parents. This newfound independence has had a profound effect on the goals that Leon sets himself. Leon already has a positive relationship with a number of support workers. These new relationships have helped Leon to move beyond his comfort zone, which was built around having his Mum or Dad with him all of the time.*

*With the confidence that comes from his increased independence, Leon might decide down the track to move to self-management. This step will be made easier for Leon if he has a clear understanding of what to expect from support workers, and what makes for a safe working relationship. However, if Leon believes the only way to be safe is to have a registered worker, he may be discouraged from taking more control. -* YDAS case study (2017)

YDAS strongly believes that the Victorian Government should use the proposed Registration and Accreditation Scheme to educate young people to make safe choices rather than become so restrictive that it removes the freedoms usually gained by young people through development.

Moreover, YDAS strongly urges the Victorian Government to protect existing choice and control mechanisms provided by the NDIS in the design of any new Registration and Accreditation Scheme.

Beyond preserving existing arrangements that work, the Registration and Accreditation Scheme design must consider the changing circumstances of young people as well as the desire of young people to assume greater control over supports. The system should not inadvertently discourage self-management or steps towards self-management. It should actively promote greater decision making both within the framework of a Registration and Accreditation Scheme and outside of it through actively encouraging capacity building towards self-management. Broadly speaking, this may be achieved by giving the Scheme an educational arm covering expectations of support workers, making a complaint and also when and how to step away from using accredited and registered workers.

This is in line with the policy focus of the NDIS on capacity building, both within plans and across the Information, Linkages and Capacity Building policy setting. This fits with the insurance principles of the scheme as well as the findings of the 2011 Productivity Commission inquiry which linked scheme viability to the long term growth in the capacity of its participants. (Productivity Commission 2011)

YDAS believes that undue administrative or bureaucratic burden may deter young people with disability from attempting to take on the responsibility of self-management, while also denying people with disability the ‘dignity of risk’ which inherently builds capacity over time. Because of this, YDAS strongly supports a system which is low cost for workers and people with disability and easy for young people with disability to access independently of their parents if they wish.

When implementing intended safety measures that will inevitably impact upon how people with disability exercise choice and control, it is important to understand how you are defining ‘capacity’ and ‘risk’ – a task which is both complex and context dependent, and which may give arbitrary power to people without lived experience or understanding of disability. YDAS does not endorse any assessments of risk that incorporate a judgement of individual capacity as a means of determining the level or type of regulation an individual participant needs to use.

Within this submission we will address the key questions put forward within the discussion paper. YDAS will address four distinct areas within the scheme;

* Registration
* Accreditation
* Mandatory minimum qualifications
* The path forward

# **2. Issues and Recommendations**

## **2.1. Registration**

**How should the scheme operate?**

Accessibility of the scheme will be crucial to its ability to track workers of concern and build sector capacity, which means the design of the scheme should be underpinned by the goals of ease of understanding and ease of use. This will be especially crucial for young people seeking to increase their independent use of the Scheme, and looking to decide whether they use it as they begin adopting self-management.

**Features of an easy to understand and easy to use Scheme include:**

**A clear, easy to follow structure for registration:**

One important element of this ‘ease of use’ is the financial burden incurred by individual support workers. YDAS believes that a number of levels or tiers of registration with specific categories of workers covered will assist workers to decide to be covered at a basic level as they enter the disability support workforce while showing clear career options in other, more prestigious, categories. A clearly labelled system will help people with disability to understand what to expect of different types of support workers. For example, speech therapists have accreditations in allied health which are not relevant to generic support workers. To avoid confusion, the system should not have too many categories or sub-categories, and should use plain language labelling.

**Time and documentation required to register:**

The Scheme should not require layers of documentation and should be able to receive information from other sources (such as relevant allied health registration schemes) where possible. At the lowest level of registration, police checks, Working With Children Checks and proof of identity should be all that is required, with administrative and financial supports in place for workers as needed. Workers should be able to begin working in the sector for a certain amount of time before their application is made and processed, though individual organisations should be free to decide otherwise.

The information listed above would ensure a basic level of accountability as well as ensuring effective data collection practices within the sector (to be discussed later in the submission). YDAS recognises that disability support work (inclusive of therapy) is provided in a number of sensitive locations such as schools. Maintaining checks will assist schools in feeling confident in having disability support workers and other allied health professionals on school grounds.

The barrier to entry into the Registration and Accreditation Scheme needs to reflect the need of the sector to attract a large number of workers to disability support. This should be accomplished by keeping requirements as practical and reasonable as possible. Entry level disability support work should be viewed as a pathway through which individuals on Newstart or the Disability Support Pension (DSP) could move into the mainstream employment market. Maintaining a low barrier to entry will avoid major disruption to the existing workforce and also assist with workforce growth.

**Recommendation:**

YDAS would recommend that base registration include;

* Sight documents (identification)
* Working with Children Check
* Police check
* Record of current employment (service provider/ self-employed)
* Tasks being performed
* Working environment (closed/open)

**Optional:** Details of qualifications in the format of a micro-badging or endorsement system.

**Recommendation:**

YDAS recommends that there are no mandatory accreditation requirements except where these already exist in other sectors, or where the professionalization of specific parts of the workforce will assist people with disability who are less empowered than others. For example, workers in closed environments should have evidence based qualifications.

**Ease of information access:**

For young people with disability either wishing to register for the Scheme, looking to make a complaint or search for a registered worker, being able to do so quickly and easily will be important. The Scheme design should not restrict these activities to paper based or in person only and should be required to meet all relevant accessibility standards. It should be a requirement of the Scheme that all methods for front facing access are co-designed with people with disability, including young people.

**Ease of transition and growth:**

For the Scheme to work well in the long term, it must be easy to adopt and maintain as it is rolled out. It’s also crucial to retaining as much of the existing workforce as possible and building a system which accurately collects relevant data. Effective data collection is facilitated by ensuring that registration is made mutually beneficial. When workers have incentive to provide more details about their skills and attributes the Scheme will be able to better predict workforce gaps.

YDAS understands that the responsibility to provide some incentives for registration may fall on employers rather than the Victorian Government. However, incentivizing registration will lead to more complete sector data and a greater ability to detect serious but non-criminal behaviour by individual workers and across providers.

**Recommendation:**

YDAS recommends a ‘staged’ registration process that would allow individuals to begin their registration online; continue or commence work and then complete their full registration over a set amount of time (e.g. two weeks or a month).

**Recommendation:**

YDAS recommends that there are tangible benefits connected to registration. Examples of these benefits observed in other regulated sectors include:

* Discounts for registered workers (professional development, equipment, indemnity insurance).
* Ability to display qualifications to potential client base
* Access to online training modules
* Transferable registration to other sector schemes (health and aged care)

**Recommendation:**

YDAS recommends the Victorian Government conduct further consultation with people with disability and disability support workers in order to make sure incentives are as targeted as possible.

**Who should the scheme apply to?**

YDAS supports a registration scheme that applies comprehensively to all paid disability support workers, with the exception of workers for self-managed NDIS participants.

YDAS supports a registration scheme with a broad scope that acts as mandatory screening process for all disability support workers, where ‘disability support worker’ is a defined term excluding support workers for people with disability who self-manage their supports. Self-managing participants have already been required to demonstrate decision making capacity and relevant skills according to the NDIS Act. YDAS believes that imposing controls on their ability to take risks allowed by the NDIS goes against the human rights obligations of Australian state governments and creates unnecessary confusion.

This position is in line with the policy of self-directed funding in the United Kingdom that allows individuals (and families of individuals) who have assumed complete responsibility to move outside of the pool of registered workers (DHS 2015).

**Recommendation:**

YDAS recommends that disability support workers employed by self-managing NDIS participants should not be required to be registered.

**Recommendation:**

YDAS recommends that the definition of disability support worker or practitioner should include management and upper management. In the case of management and upper-management ‘disability support work’ is not limited to direct contact with a person with disability.

YDAS believes strongly that a minimal level of registration should apply to the vast majority of disability support workers, as long as it is clear about what is being defined as disability support work. The distinction being that under the National Disability Insurance Scheme an individual who carries out lawn maintenance funded by an NDIS package may be considered to be undertaking disability support work; however they are not a disability support worker because this work is carried out across the community regardless of whether a person has a disability. To require the registration of individuals performing mainstream services within the ‘disability market’ would limit considerably the access people with disability have to a competitive market.

**Recommendation:**

YDAS recommends that individuals providing mainstream services to a person with disability be exempt from the Registration and Accreditation Scheme.

YDAS cautions enforcing the scheme on the volunteer workforce, especially volunteers working less formally with people with disability. YDAS believes that people with disability are safer when they maintain an informal (unpaid) support network in addition to paid supports. Making it more difficult for volunteers to engage naturally with people with disability is likely to put them at further risk and increase their isolation from the wider community.

Volunteers engaged in more formal programs are already covered by screening procedures of the organisation facilitating the program, however registration may help to make sure volunteers who have concerning but non-criminal behaviour when working with people with disability are identified. YDAS believes that any registration for formal volunteer programs should not incur extra cost on volunteers and their organisations.

**Recommendation:**

Volunteers working with people with disability in an informal capacity should be able to opt into the Scheme but should not be required to register. Volunteers involved in formal programs which could be classified as disability support work should register at no costs to themselves or their organisation.

**Payment and funding the scheme:**

In the interest of keeping the barrier to registration as low as possible, costs for individual workers should be kept as reasonable as possible. This will allow potential workers coming from unemployment or casual work, such as young people and people with disability, to enter the workforce in low qualification, high demand areas of disability support work.

In reference to people with disability specifically, the Victorian Government has expressed an interest in improving the employment of people with disability through maintaining their presence in the disability support workforce. People with disability have expressed a desire to use their NDIS plans as a method by which they can specifically hire other people with disability. Hiring workers with disability can reduces the burden on people with disability to explain their support needs. Workers with disability are arguably more likely to see the inherent value in disability support work, so worker retention and client safety may well increase as the number of people with disability in the workforce increases.

YDAS believes that the employment of people with disability as support workers is critical, and should be encouraged through a Sector Development Fund created through any surplus from registrations and/or government contributions.

**Recommendation:**

YDAS recommends a cost no greater than $100 for individual support workers.

**Recommendation:**

YDAS recommends that the cost-gap between the individual payment and the costs of the scheme be subsidised by the Victorian Government.

**Recommendation:**

YDAS recommends reduced registration rates for:

* Students
* Young people (18 – 25)
* People receiving government benefits
* People with disability

**Recommendation:**

YDAS recommends that a percentage of the funds gained through the Registration Scheme be placed into a Sector Development Fund to be used to facilitate and incentivise the employment of people with disability.

**How should the scheme be implemented?**

YDAS understands that the proposed Scheme is only one element of the proposed safeguards and that this Victorian Scheme is being designed to operate in cooperation with the National Quality and Safeguarding Framework (QSF), even though legislation enabling the Framework is still under consideration. YDAS cautions against any permanent decisions occurring prior to clarification of the National QSF.

**Recommendation:**

YDAS recommends delaying the implementation of a state scheme until the necessary information is available to avoid unnecessary overlap with the National QSF.

Unnecessary overlap is likely to cause the process of accessing supports to become more complex. Legislative overlap between the state and national frameworks could also lead to the waste of resources if not implemented well.

If the Victorian Government is committed to roll out of a Registration and Accreditation Scheme earlier than, or concurrent to, the National QSF then a staged implementation will be critical.

**Recommendation:**

YDAS recommends implementing registration slowly and in line with the level of administrative burden and cost required.

The Scheme will need to include a transitional period in order to ensure minimal disruption to the existing workforce. A large percentage of people with disability have spent years developing very personalised and comfortable support arrangements.

When implementing this legislation, the Victorian Government needs to be careful not to disrupt these existing support arrangements. Disruption to these arrangements will result in reduced quality of life for people with disability, as well as the potential for unnecessary trauma. In the interest of a smooth transitional period YDAS makes a number of recommendations.

**Recommendation:**

YDAS recommends the use of a ‘grandfathering period’ during the implementation of the Scheme to allow workers to obtain checks over time.

**Recommendation:**

In the interest of recognising the capacity of the existing workforce, especially those who came to disability support work through informal means, YDAS would recommend that the Victorian Government grant equivalent accreditation based on experience.

**Information sharing and data collection:**

YDAS supports effective information sharing between the regulator and regulators of other service sectors. YDAS is concerned that without effective information sharing individuals who have been excluded from working within other service sectors (e.g. health) could move across and begin working in disability support due to the need for an increase in disability support workers created by the NDIS.

This information sharing would be useful in cases where the proposed regulator has identified a number of complaints made towards workers who have the same employer (registered NDIS service provider). Identifying poor organisation practices would assist the Quality and Safeguarding Commission in administering appropriate banning orders at an organisational level.

Information sharing about complaints across schemes and sectors is crucial to the success of the Scheme. However, YDAS recognises that making a complaint is often a difficult and sensitive matter for people with disability and their anonymity should be protected wherever possible, including in any mandatory public reporting of complaints data.

Similarly, YDAS has concerns that individuals who have been excluded from providing disability support services will continue to operate in other sectors such as aged care, and across other state and territory jurisdictions.

**Recommendation:**

There should be effective information sharing between the proposed regulator and the Quality and Safeguards Commissioner (at a national level), and between any other regulators created in other jurisdictions.

**Recommendation:**

YDAS would recommend consistent and comprehensive data collection on the part of the regulatory body. Such positive data collection practices would facilitate:

* Sector development
* Affirmative action such as scholarships
* Systemic investigations

This data collection would be further strengthened by requiring disability support workers to complete a workforce survey when renewing their registration.

**Recommendation:**

YDAS recommends including a workforce data survey as part of registration renewal process.

**Recommendation:**

YDAS recommends establishing protocols for cooperation between the proposed regulator and the National Quality and Safeguards Commissioner. YDAS would recommend existing arrangements within the health sector as a model for this cooperation. In particular reference to cross-jurisdictional matters.

This cooperation should still allow for matters to be resolved quickly in cases where an immediate resolution is required.

**Recommendation:**

YDAS recommends that the proposed regulator be given strong investigatory powers in line with the ‘own-motion’ powers recently granted to the Victorian Disability Services Commission.

**Publicly Available Register:**

YDAS supports a publicly available register of disability support workers. Providing information to people with disability will improve their capacity to make informed decisions.

**Recommendation:**

YDAS recommends consultation with people with disability to ascertain what information assists them the most effectively in choosing a support worker.

## **2.2. Accreditation**

YDAS does not endorse qualifications being required for registration unless these are already required under other industry regulations. However, we do recognise that providing a means for disability support workers to advertise their skills to potential employers and people with disability may promote professionalism within the workforce.

YDAS has received feedback that indicates that the existing certificates III and IV in disability do not equip workers with the values that young people look for in a ‘qualified’ support worker.

According to young people the existing qualifications misunderstand the complexity and diversity of disability.

*“People come out of the certificate III in disability and treat everyone like they have an intellectual disability even when they don’t.”- NDIS participant*

When asked what they look for in support workers young people indicated a need for;

* Similar interests
* Comparable age
* A sense of fun or trust

*“The most important thing I would like from a disability organisation is someone who I can trust, someone I can feel comfortable with and someone who actually cares about me and doesn’t just treat it like it’s a job.”- NDIS participant*

At the time of writing, YDAS is aware of no body of evidence that substantiates the claim that accreditation of workers and education and training programs increases the safety and wellbeing of people with disability.

**Recommendation:**

YDAS recommends that registered disability support workers should have the option to add their qualifications to their registration for the purpose of providing information only, assuming they have no mandatory qualification criteria for their work under other schemes (such as occupational therapists).

**Recommendation:**

YDAS would recommend the inclusion of ‘values-based’ training options. Values based training around attitudes to people with disability could be included as an endorsement or micro-badge on a support worker’s registration. This could also be used to identify disability support workers who have undergone training in other specialist areas including;

* Interaction with young people
* Cultural awareness (Aboriginal and Torres Strait Islander)
* LGBTIQA awareness
* Positive practices

**Recommendation:**

YDAS recommends that people with disability be included meaningfully within the body that will accredit, audit and monitor education and training programs.

**Recommendation:**

YDAS recommends that the mandatory review of the legislation (after two years\*) be used to determine if evidence exists to continue the push for accreditation.

## **2.3. Mandatory Minimum Qualifications**

YDAS does not support a registration scheme that sets mandatory minimum qualifications for the majority of disability support workers. The establishment of mandatory minimum qualifications is likely to alienate individuals who arrived at disability support work (the disability sector) through providing informal supports.

Assigning mandatory minimum qualifications will limit sector growth as individuals such as university students will no longer view disability support as viable part-time work.

Mandatory minimum qualifications will also result in the exclusion of individuals who are incompatible with formal education and training from undertaking disability support work, such as people with intellectual disability.

People with disability in rural and regional areas already experience difficulty in accessing support services. Instituting mandatory minimum qualifications will put further strain on an already struggling market. Disability support workers living in rural and regional areas are unlikely to have easy access to a VET training provider (AIFS 2016).

In order to facilitate the choice and control of people with disability the Victorian Government needs to ensure that people with disability can engage a broad market to find a support worker that fits their needs. Enforcing mandatory qualifications shrinks the pool of potential support workers and ultimately limits choice and control.

The concept of mandatory qualifications stands in clear opposition to the idea that people with disability are the experts on their own support needs.

However, in the case of restrictive practices or work in closed environments YDAS would concede that mandatory minimum qualifications may provide a level of protection/minimum standard of services. YDAS believes any new minimum qualifications should be monitored carefully by the regulator to ensure a clear link between training, quality and safety.

**Recommendation:**

YDAS recommends that the Victorian Government use the time prior to the mandatory review of the scheme to trial a number of models of accreditation for closed settings with extensive community consultation.

**Recommendation:**

YDAS recommends that people with disability be included in both curriculum development as well as the setting of accreditation standards.

## **2.4. The Path Forward**

As was established in the beginning of our submission it is currently very difficult to know how all the legislative and regulatory pieces will fit together in relation to the NDIS.

The Victorian Government should recognise that administrative difficulties and challenges already exist when accessing the NDIS. There is a steady stream of publicly available evidence of these issues, including the recently released Productivity Commission Report into NDIS costs. These difficulties have been reflected an increase in YDAS individual advocacy cases, and reinforces the continued difficulty that young people can experience navigating complex, overly bureaucratic systems which can devalue their basic human rights.

In addition to the burden on individual people with disability, red tape for the sake of red tape may lead to a burden on both the Victorian Government and the disability service sector as a whole, diverting resources from much needed workforce development strategies and empowerment tools for people with disability.

In the interest of ensuring that Victoria remains a leader in promoting the rights of people with disability, YDAS makes a number of recommendations in relation to the future of the proposed Registration and Accreditation Scheme.

**Recommendation:**

YDAS recommends that the legislation underpinning the Scheme be reviewed within 2 to 3 years of implementation.

**Recommendation:**

YDAS recommends that the success of the Scheme be judged primarily based on the realisation of the rights of people with disability as outlined in the beginning of this submission.

**Recommendation:**

YDAS recommends that information gathered be used appropriately to inform the review of the scheme, including:

* The effectiveness of registration and accreditation to inform quality and safety in the workforce.
* Gaps in the workforce, including young workers and workers with disability.
* The level of choice and control afforded to people with disability by the scheme as reported by people with disability.
* The interaction with the national QSF and any other jurisdictional schemes.

**Appendix**

NDIS Act 2013

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