



SUBMISSION

Supported School Transport and the National Disability Insurance Scheme

20 July 2018

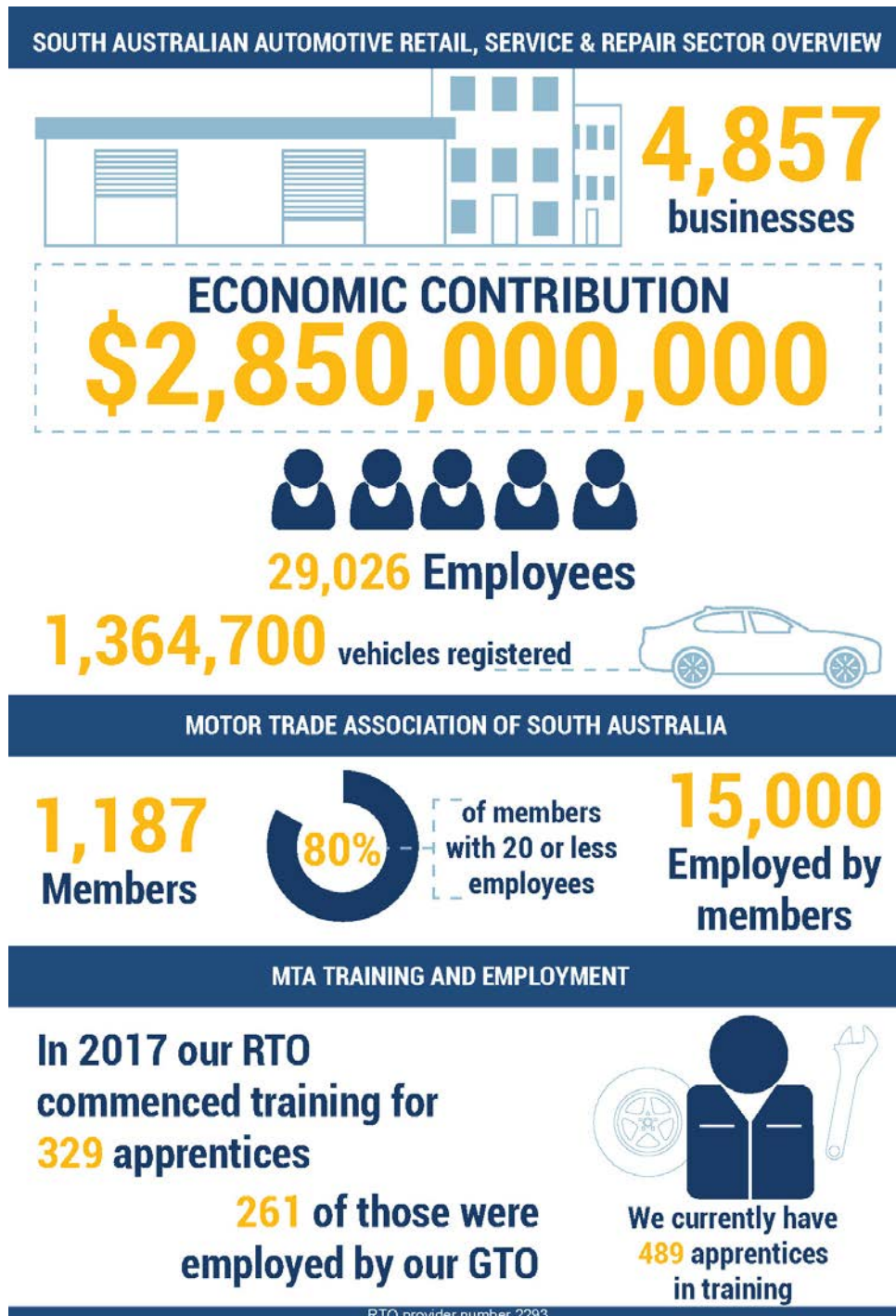
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2. About Us

The Motor Trade Association of South Australia is the only employer organisation representing the interests of the automotive retail, service and repair businesses in the state.

The MTA Training and Employment Centre comprises both our Registered Training and Group Training Organisations. It is the industry's automotive training provider of choice and is the largest employer of automotive apprentices in South Australia.



DIVISIONS



3. Glossary

MTA Motor Trade Association of South Australia

NDIS National Disability Insurance Scheme

4. Industry Consultation

This submission summarises the views of the MTA's members. In developing this submission, the MTA has consulted with members involved in the provision of transport services.

5. Executive Summary

Ensuring that children with special needs receive the optimum level of supported services is a key concern of the MTA and the wider transport sector in relation to school transport.

The MTA strongly agrees that funded supports in a participant's NDIS plan must help participants achieve their goals, maximise their independence and participation in the community.

A critical component of ensuring that children receive the high quality services they need is also ensuring that quality providers are able to sustainably deliver those services.

The MTA's response seeks to address the concerns expressed by our members for the welfare and wellbeing of NDIS participants, their families and caregivers.

The NDIS is a landmark reform that provides support for Australians with a disability, their families and carers.

The NDIS provides about 460,000 Australians under the age of 65 with a permanent and significant disability with the reasonable and necessary supports they need to live an ordinary life.

The NDIS gives all Australians peace of mind that if their child or loved one is born with or acquires a permanent and significant disability they will get the support they need.

The consideration of how the NDIS can support access to schooling is timely, coinciding with a period of change within the transport industry.

Ensuring safe, flexible and affordable access to supported transport services is a complex matter that must also take into account the need to ensure the sustainability of high quality providers to ensure the NDIS's overarching objectives are met and NDIS participants are appropriately supported with high quality services.

The discussion paper has proposed essentially two models.

The first model centres on either direct engagement of providers or engagement through brokerage services.

This model has been trialled in South Australia with success. However, questions remain as to how such a model can be implemented on a large scale, particularly in metropolitan regions, without compromising NDIS participant's needs or threatening operator sustainability.

The second model recognises the inherent challenges associated with the first, and accepts that current arrangements have developed over time to meet the needs of communities.

In either model, questions around appropriate levels of pricing remain unanswered. These questions go to the heart of ensuring that quality operators are able to continue to provide high quality services to the community.

In addition, the implementation of changes to current transport arrangements requires, in the MTA's opinion, significant further work before they are implemented on a large scale. In particular, how to meet client needs for safety, comfort, routine and strong positive relationships could be compromised by the use of brokerage or direct engagement models.

The MTA looks forward to working with State and Federal Governments to assist the progression of these matters.

6. Key Recommendations

The Motor Trade Association of South Australia makes the following recommendations:

1. Current arrangements, including the trial of brokerage services in discrete regional markets, be continued; to better inform the future development of options for supported school transport under the NDIS
2. Further work be undertaken to develop safeguards in relation to probity, participant safety and quality to ensure that any future options meet the needs of clients and ensure the sustainability of providers

7. The problem being solved

Supported school transport is provided to some children and young people with a disability so that they can travel to and from school. Currently, supported school transport is funded and delivered by state and territory governments and arrangements are different in each jurisdiction.

Governments have agreed that supported school transport is the responsibility of the NDIS where a child is a NDIS participant. The discussion paper notes that the intention is that the NDIS will be responsible for reasonable and necessary *'transport to and from a school/education facility required as a result of a person's disability (where no other option, such as public transport, is available or suitable and not substituting for parental responsibility)'*.

This means that supported school transport may be funded in an NDIS participant's plan when deemed reasonable and necessary.

The Australian Government, and state and territory governments have been working together to understand if and how supported school transport could be delivered in the NDIS.

The discussion paper asks for feedback on how to make sure that if supported school transport is in the NDIS, it is safe, flexible, affordable and reliable.

8. Consideration of Options

The discussion paper requests consideration of two options for the operation of supported school transport. From the MTA's point of view, we believe it is

critical that the sustainability of any solution is also considered. Sustainability of any service delivery model is fundamental to ensuring quality service delivery that achieves safety, flexibility and affordability.

The two options being considered are explored below:

Supported school transport is included in the NDIS

Under the NDIS, eligible participants would receive funding for support that is reasonable and necessary to assist their travel to and from school. These supports might include:

- supported school transport (specialist buses and other vehicles);
- other supports including chaperone/support persons to accompany the student to/from school;
- travel training to use public transport or regular school transport; or
- vehicle modification (for parents' vehicles where these are used to transport NDIS participants to/from school).

Where NDIS participants receive funding for supported school transport, they and their families would have the flexibility and choice to either:

- engage directly with transport providers, to make service bookings and arrange payments; or
- use a service (such as a transport broker) to organise transport services on their behalf.

In line with the choice and control principles of the NDIS, participants and their families would be direct customers of supported school transport providers. They would agree whether the same driver or chaperone/support person will be provided, the route and time of pick-up and changes to destination.

Evaluation

The MTA considers that a number of issues remain unaddressed at this time as to both the direct engagement of transport providers as well as the use of brokerage services.

The MTA is aware of the trial of a transport brokerage service in Port Pirie which has shown positive results in co-ordinating the transport options in that discrete market.

The trial has proven effective in proving that such a model can successfully allocate limited resources to meet local demand.

The MTA is also aware of concerns, raised in general terms, that brokerage services may inadvertently introduce bias, or in some cases unethical behaviour, that favours certain providers if the brokerage service was operated by non-government entities.

There is no suggestion of this that the MTA is aware of in relation to the Port Pirie trial. However, there is at the very least a perceived risk. While a government controlled brokerage service was viewed more favourably by members, concerns around the capacity of a government department to manage such a service on a national scale were also raised. To further complicate matters, the probity risk is not completely removed even with a government brokerage service.

The consequence of such perceptions or actions would be detrimental to providers utilising the brokerage service.

In addition, the MTA is concerned that should such a model be implemented on a large scale, additional safeguards would be required to ensure that vulnerable children are protected.

Feedback from MTA Members has indicated that NDIS participants value routines and positive relationships with drivers as well as the feeling of 'being safe'. The introduction of a brokerage service in metropolitan areas, particularly if it were to include the use of taxis or similar services, would find it difficult to meet this criteria from a scheduling perspective.

Notwithstanding these comments, the MTA considers there may be advantages to utilising some form of brokerage service for NDIS participants, particularly if the scheduling were to incorporate the utilisation of accredited drivers operating Home and Community Care buses, which are currently underutilised in the community.

In terms of direct engagement of service providers, feedback from stakeholders and members raised concerns regarding the ability of customers to adequately assess and manage the contracting of services with appropriately qualified providers.

With NDIS participants being given an allowance for supported travel, the likely inclination of participants is to choose lowest cost providers. This raises serious questions about what quality and safety frameworks are required to protect vulnerable children in this scenario. These have not been sufficiently developed at this time.

In addition, the MTA questions how caregivers and parents can realistically manage direct provider engagement on a daily basis given their own time constraints and the need for high levels of knowledge around compliance, accreditation, school and transport scheduling as well as the needs of participants. Such management may prove overwhelming even to the best intentioned and experienced caregiver.

Current arrangements remain

Governments have agreed that supported school transport should be delivered under the NDIS. However, if no viable model is identified or supported, then governments could be asked to agree that current arrangements be retained.

This would mean that state and territory governments would continue to deliver and fund supported school transport as per the arrangements outlined above, outside of the NDIS.

The discussion paper states that targeted consultations with parents, schools and transport providers conducted in 2017 identified that while choice and control and equity were important, most people were broadly supportive of the current arrangements.

Evaluation

Feedback from members has indicated that while the current arrangements are not perfect, they are the most favoured at this time.

Notably, members have raised concerns relating to the cost to deliver such services for relatively small numbers of participants and the ability to reasonably recover these costs from the NDIS.

While the MTA shares the concerns of our members regarding current arrangements, and is eager to work with government on developing a solution that meets stakeholder expectations, the MTA considers that the discussion paper options require substantial further work before any of the proposals can be supported.

On this basis the MTA considers that current arrangements, including the trial of brokerage services in discrete regional markets, be continued, to better inform the development of options for supported school transport under the NDIS.

9. Next Steps

The MTA is available to provide further information in relation to this submission and to clarify any aspect of it.

This includes meeting with agency representatives and facilitating further consultations with industry on proposed changes.

10. Submission Contact

For further information relating to this submission please contact:

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