

4 November 2016

Committee Secretary
Senate Standing Committee on Community Affairs
PO Box 6100
Parliament House
Canberra ACT 2600

By email: community.affairs.sen@aph.gov.au

Dear Secretary,

Thank you for the opportunity to provide input into the *Social Services Legislation Amendment (Transition Mobility Allowance to the National Disability Insurance Scheme) Bill 2016 (Mobility Allowance Bill)*.

The NSW Council of Social Service (NCOSS) works with and for people experiencing poverty and disadvantage to see positive change in our communities. When rates of poverty and inequality are low, everyone in NSW benefits. With 80 years of knowledge and experience informing our vision, NCOSS is uniquely placed to bring together civil society to work with government and business to ensure communities in NSW are strong for everyone. As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and evolve as needs and circumstances evolve.

As the Committee would be aware, transport costs are a major factor contributing to costs of disability and restricting the participation of people with disability in the community. As such, any tightening of the eligibility criteria for transport assistance (including the Mobility Allowance), risks decreasing participation. This is contrary to the Commonwealth Government's responsibilities under the *National Disability Strategy 2010-2020*.

This submission:

- outlines the importance of preserving volunteering and job search activities as activities that qualify a person for the Mobility Allowance, and maintaining the 12 week continuation period;
- emphasises the need for certainty about the application of continuity of support arrangements; and
- argues for an individualised approach to transport subsidies under the National Disability Insurance Scheme (NDIS).

Mobility Allowance should support volunteering and job search activities

We note that under the changes proposed, people with disability will no longer be eligible for the Mobility Allowance (or transport funding under their NDIS plan) because they take part in volunteering or vocational rehabilitation activities.¹ Job search activities appear to attract transport funding under the NDIS,² but they will no longer be classified as 'qualifying activities' under the *Mobility Allowance Bill*.³

¹ *Mobility Allowance Bill*, sch. 1, [14]-[15].

² National Disability Insurance Agency [Participant transport funding information](#).

³ *Mobility Allowance Bill*, sch. 1, [6].

Both volunteering and job search activities play an important role in preparing people with disability for economic and workforce participation, particularly given that people with disability are almost twice as likely than the general population to be unemployed.⁴

- Volunteering provides people with opportunities to learn skills which will boost their capacity for economic participation. Research demonstrates that volunteering increases a person's suitability for employment⁵ while also making a significant contribution to the Australian economy.⁶
- Job search activities are an integral precursor to workforce participation and for people with disability, looking for work (including attending interviews) can incur significant transport costs. Barriers faced by people with disability in finding work⁷ can lengthen the job search process, exacerbating these costs.

To this end, NCOSS recommends that volunteering and job search activities are included as 'qualifying activities' in relation a person's eligibility for the Mobility Allowance.

Continuation period for Mobility Allowance

In light of the difficulties people with disability face in finding work, the proposal in the *Mobility Allowance Bill* to cut the continuation period for the Mobility Allowance from 12 to 4 weeks⁸ could result in a person's ability to attend job interviews being limited by transport costs. This would have adverse effects on economic and workforce participation, particularly if job search activities are not recognised as 'qualifying activities' in terms of eligibility for the Mobility Allowance.

Accordingly, NCOSS recommends the 12 week continuation period be maintained in the *Mobility Allowance Bill*.

Need for certainty around continuity of support arrangements

Although the Minister's Second Reading Speech acknowledges continuity of support arrangements for people currently receiving the Mobility Allowance,⁹ the *Mobility Allowance Bill* provides no details about these arrangements. Indeed, the Second Reading Speech states that the Government is 'working towards' these arrangements.¹⁰

NCOSS urges the Commonwealth Government to provide further detail about how the continuity of support arrangements will operate as soon as possible to enable public certainty around this issue.

⁴ In 2015, 10% of people with disability aged 15-64 were unemployed, compared to 5.3% of those without disability. (Australian Bureau of Statistics (2016) [Survey of Disability, Ageing and Carers, Australia: First Results](#)).

⁵ See Jorgensen, H. (2013) [Does It Pay To Volunteer? The Relationship Between Volunteer Work and Paid Work](#), Centre for Economic Policy and Research.

⁶ Volunteering Australia (2015) [Key Facts and Statistics about Volunteering in Australia](#).

⁷ See Australian Human Rights Commission (2016) [Willing to Work: National Inquiry into Employment Discrimination against Older Australians and Australians with Disability](#).

⁸ *Mobility Allowance Bill*, sch. 1, [34].

⁹ Porter, C (2016) *Mobility Allowance Bill* [Second Reading Speech](#).

¹⁰ Ibid.

Individualised approach to transport funding under the NDIS

Though not directly related to the subject matter of the *Mobility Allowance Bill*, we take the opportunity to draw the Committee's attention to the inadequacy of transport funding under the NDIS.

As the Committee would be aware, three levels of funding are provided for transport under the NDIS; the top level of \$3,456 per year being equivalent to the higher rate of the Mobility Allowance.¹¹ This level of funding will be provided to “participants who are currently working, looking for work, or studying, at least 15 hours a week, and are unable to use public transport because of their disability.”¹²

Even with the recent increase to the Taxi Transport Subsidy Scheme in NSW,¹³ this level of funding is manifestly inadequate compared to the transport costs faced by many people with disability.

Like other supports in a person’s NDIS package, eligibility for transport should be determined on a ‘reasonable and necessary’ basis. Although participants can receive more funding if they have supports (mainstream, informal or funded) in their plan that enables their participation in employment,¹⁴ it is unclear how these criteria will be applied.

An individualised approach would tailor each participant’s transport support to their individual circumstances including how many hours of activity they want to undertake, and where they live (recognising the increased transport costs for people who live further from city centres, or in rural and regional areas). As highlighted above, it is important that volunteering be recognised as an activity for which a participant can receive transport funding.

Thank you for taking the time to examine this Bill. If you have any questions about the points raised above, please email Carolyn Hodge (NCOSS Policy Lead, Disability) at carolyn@ncoss.org.au.

Yours sincerely



Melanie Fernandez
Acting Chief Executive Officer

¹¹ \$130 per fortnight, \$3380 per year. See Australian Department of Human Services [Mobility Allowance](#).

¹² National Disability Insurance Agency [Participant transport funding information](#).

¹³ Transport for NSW “[More support for taxi customers with disability](#)”.

¹⁴ National Disability Insurance Agency [Participant transport funding information](#).