

Mental Health Australia

Submission to the Department of Social Services consultation on General Foundational Supports

5 December 2024

Mentally healthy people, mentally healthy communities

About Mental Health Australia

For over 25 years Mental Health Australia has advocated for mental health reform, and we continue to drive policy changes and proactively put mental health on the agenda.

We have over 140 members, including service providers, professional bodies, organisations representing people with lived experience of mental ill-health, family, carers and supporters, researchers and state and territory mental health peak bodies.

As the national peak for mental health, we unite the mental health sector to present a cohesive voice to government, and provide practical policy solutions to influence decision-making, which in turn, improves the mental health system and the mental health of people in Australia. We work to strengthen the impact and influence of the mental health sector, and embed a human rights approach across the mental health system.

The views and expertise of people with lived and living experience of mental ill-health, family, carers and supporters, along with our member organisations, underpins our work. We believe that by bringing together diverse perspectives across Mental Health Australia's members, the community and governments, we will create greater change and more innovative solutions, than what any of us could do working alone.



Introduction

Mental Health Australia welcomes the opportunity to provide input to the Department of Social Services' consultation on General Foundational Supports. Australia has undertaken to promote the realisation of all human rights and fundamental freedoms of people with disability. Implementing the National Disability Insurance Scheme (NDIS) Review's vision of a connected system of support for all people with disability including "accessible and inclusive mainstream services, foundational supports, support from a navigator and individual support funded through the NDIS" is fundamental to delivering this commitment. General Foundational Supports are a critical feature of this connected system and should include supports specific to people with psychosocial disability. This submission makes recommendations about supports that will benefit people with psychosocial disability as a part of General Foundational Supports across the four main categories outlined by the Department of Social Services:

- information, advice and referral
- individual capacity building supports
- family capacity building supports
- community capacity building supports.

This submission also makes recommendations about how to ensure safe and quality services are delivered through General Foundational Supports alongside what are the critical success factors for implementation.

Recommendations

Following is a summary of recommendations outlined in this submission. Further information and rationale for each recommendation is provided in the following sections of this submission.

Recommendation 1:

Information, advice and referral services funded through General Foundational Supports should include services for people with psychosocial disability which:

- are co-designed with people with psychosocial disability, carers, family and supporters
- are well integrated with existing mental health information, advice and referral services
- include a proactive outreach component.



¹ NDIS Review, "Foundational supports for all people with disability," Accessed November 26, 2024, https://www.ndisreview.gov.au/resources/fact-sheet/foundational-supports-all-people-disability.

Recommendation 2:

Individual capacity building supports funded through General Foundational Supports should include services designed to support people with psychosocial disability including (but not limited to):

- Peer support programs
- Recovery colleges
- Digital psychosocial supports
- Community connection focussed models of support, such as Clubhouses
- Support for decision making.

Recommendation 3:

Family capacity building supports funded through General Foundational Supports should include supports designed specifically for mental health carers, which could include family psychosocial education, family focussed services similar to the NSW Family and Carer Mental Health Program, family focussed interventions, for example, Open Dialogue, and carer respite.

Recommendation 4:

To build the capacity of the community to be more inclusive and responsive to the needs of people with psychosocial disability, General Foundational Supports should fund stigma reduction initiatives, mental health awareness and response programs, and training for mainstream services in trauma-informed care and practice and supported decision making.

Recommendation 5:

In order to ensure delivery of quality and safe General Foundational Supports to people with psychosocial disability, Australian Governments should ensure:

- General Foundational Supports funding covers the real cost of psychosocial support delivery
- implementation of General Foundational Supports strengthens the psychosocial support workforce
- appropriate infrastructure is in place to effectively steward the ecosystem of foundational supports to ensure quality and safe services are available to people who need them
- the design and implementation approach for General Foundational Supports and other reforms relevant to the psychosocial support workforce is communicated early and clearly to the psychosocial support sector
- services are appropriate to the community they are delivered within, particularly when serving First Nations people, people in rural and remote Australia, people from culturally and linguistically diverse backgrounds and people from the LGBTIQ+ community.

Recommendation 6:

In its response to the NDIS Review Australian Governments should clearly articulate their approach to, and relevant infrastructure to support, a smooth transition across implementation of the NDIS Review's recommendations, including Foundational Supports.



Information, advice and referral

Well-functioning information, advice and referral services are critical to a connected system of support for all people with disability. Mental Health Australia has identified three components that are particularly important to ensuring people with psychosocial disability receive the right information at the right time from such supports.

First, the information, advice and referral processes and content must be co-designed with people with psychosocial disability, family, carers and supporters. Information, advice and referral processes and content that are co-designed are more likely to be relevant to the people using the service, and use existing communication channels preferred by people with lived experience of psychosocial disability, carers, family and supporters.

Second, the information, advice and referral processes should be well integrated with existing mental health information, advice and referral services. This is critical as people with psychosocial disability, family, carers and supporters are more likely to access information via mental health channels than via disability channels. This is because psychosocial disability as a term is still a relatively new concept, which is still not ubiquitously understood or accepted across the community. Mental health, on the other hand, has a much longer history and it is through this lens that people are more likely to first be seeking information, advice and referral in relation to support for what they may later identify with as a psychosocial disability.

Finally, proactive outreach is a critical component of ensuring people who can most benefit receive appropriate information, advice and referral. Many reports have noted the lack of a proactive outreach function hampering people's ability to access the NDIS.^{2,3,4} For example, in 2020-21, the National Disability Insurance Agency (NDIA) funded Mental Health Australia to manage a NDIS Community Connectors program to deliver proactive outreach support to people with psychosocial disability who were homeless or at risk of homelessness.⁵ The program evaluation found that the proactive outreach approach effectively engaged people and supported them to access the supports most appropriate for them, including to the NDIS where this might not otherwise have been possible. It also found that such a function should be supported by longer term resourcing, a collaborative approach with the NDIA around information sharing, greater flexibility to address barriers faced by people with psychosocial disability in accessing the services, and clear role delineation for those undertaking proactive outreach.⁶

⁶ Mental Health Australia, *Outreach and connection: NDIS National Community Connectors Program for people with psychosocial disability: Final Report* (2021), https://mhaustralia.org/ndis-psychosocial-community-connectors-program.



² Mental Health Australia, *National Disability Insurance Scheme: Psychosocial Disability Pathway* (2018), https://mhaustralia.org/report/ndis-psychosocial-pathway-project-final-report.

³ David Tune, Review of the National Disability Insurance Scheme Act 2013: Removing Red Tape and Implementing the NDIS Participant Service Guarantee (2019), https://disability.royalcommission.gov.au/publications/exhibit-15-009020-nsw005400030001-david-tune-ao-psm-review-national-disability-insurance-scheme-removing-red-tape-and-implementing-ndis-participant-service-guarantee.

⁴ Dr Karen Jordan and Dr Emma Tseris, Engage-In Research Project: Access to the NDIS for people with psychosocial disability living in institutional settings: Exploring the details of effective advocacy (2022), https://pwd.org.au/engage-in-final-research-report/.

⁵ Mental Health Australia, *Outreach and connection: NDIS National Community Connectors Program for people with psychosocial disability: Final Report* (2021), https://mhaustralia.org/ndis-psychosocial-community-connectors-program.

Recommendation 1:

Information, advice and referral services funded through General Foundational Supports should include services for people with psychosocial disability which:

- are co-designed with people with psychosocial disability, carers, family and supporters
- are well integrated with existing mental health information, advice and referral services
- include a proactive outreach component.

Individual capacity building supports

Mental Health Australia strongly supports the NDIS Review recommendation that General Foundational Supports should include specific support for people with psychosocial disability. The NDIS Review recommended these specific supports should include:

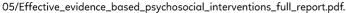
- "Peer support programs, to build mutual mental wellbeing support networks.
- Recovery colleges, where people with mental ill-health, family members, clinicians and providers can learn about mental health...
- Digital psychosocial supports, noting digital services can be effective and are currently underutilised within the NDIS."⁷

These are all valuable supports that enable psychosocial recovery. A diverse and suitably qualified workforce will be required to implement these supports, including health and allied health professionals, mental health workers and others. In particular, services delivered by peer workers appear to be particularly effective in encouraging recovery, restoring hope, empowerment, increasing self-esteem, self-efficacy and self-management of difficulties, social inclusion and engagement in social networks.⁸

In addition to these three types of services identified by the NDIS Review, there are a diverse array of effective services which should be considered for capacity building General Foundational Supports. Mental Health Australia and the National Mental Health Consumer and Carer Forum have previously provided Advice to Governments on Evidence Informed and Good Practice Psychosocial Services – of particular relevance are social and community connection focused models, including Clubhouses. In addition, General Foundational Supports should encourage innovation to ensure contemporary and individually tailored models of service can be achieved.

There is also a need for effective supported decision making services. Some people with psychosocial disability have the unique experience of having their decision-making power removed under the relevant state or territory's mental health legislation. This understandably impacts on an individual's confidence in making decisions about their life. It also means that

⁸ Dr Laura Hayes, Dr Lisa Brophy, Professor Carol Harvey, Professor Helen Herrman, Professor Eoin Killackey and Juan Jose Tellez, Effective, evidence-based psychosocial interventions suitable for early intervention in the National Disability Insurance Scheme (NDIS): promoting psychosocial functioning and recovery (2016), 102-103, https://www.mindaustralia.org.au/sites/default/files/2023-





⁷ NDIS Review, Working together to deliver the NDIS, Independent Review into the National Disability Insurance Scheme, Final Report, Supporting Analysis (2023), 531, https://www.ndisreview.gov.au/resources/reports/working-together-deliver-ndis-supporting-analysis.

in some situations people do not have the legal right to make decisions about issues that impact them. It is important that there are supports in place to ensure the will and preferences of people with psychosocial disability is genuinely explored and reflected to the fullest extent possible in decisions that impact them.

Supported decision making is a process of assisting a person to make their own decisions, so that they can develop and pursue their own goals, make choices about their life and exercise more control over things important to them. Access to supported decision making maximises a person's autonomy and independence and minimises the need for substitute decision-making and coercive practice. This type of service should be in scope for General Foundational Supports and could assist not only people with psychosocial disability but people with other disabilities as well.

Recommendation 2:

Individual capacity building supports funded through General Foundational Supports should include services designed to support people with psychosocial disability including (but not limited to):

- Peer support programs
- Recovery colleges
- Digital psychosocial supports
- Community connection focussed models of support, such as Clubhouses
- Support for decision making.

Family capacity building supports

Family capacity building supports are critical to a well-functioning and connected system of disability supports. This is no less true for carers, family and supporters of people with psychosocial disability. A report by Mind Australia and the University of Queensland found that the total replacement cost for all informal mental health carers is in the order of \$13.2 billion annually nationally. It is critical that this significant unpaid workforce that supports people in their recovery journey and to stay well are themselves supported - both for the wellbeing of carers and family members in and of themselves and for the sustainability of their caring role.

Mental Health Australia welcomes the NDIS Review recommendation that family psychosocial education be funded under General Foundational Supports for family, carers and supporters of people with psychosocial disability. Research on family psychoeducation explains it seeks to impart knowledge, social and personal skills that enable families and consumers to

^{137,} https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf.



⁹ Mind and the University of Queensland, *The economic value of informal mental health caring in Australia: summary report* (2017), https://www.mindaustralia.org.au/sites/default/files/2023-

^{05/}The_economic_value_of_informal_mental_health_caring_in_Australia_summary_report.pdf.

¹⁰ NDIS Review, Working together to deliver the NDIS: Independent Review into the National Disability Insurance Scheme (2023),

work more effectively with the challenges of living with... psychosocial disability."¹¹ It has been shown to reduce relapse for people with psychosocial disability and reduce caregiving difficulties for carers.¹² The psychosocial focus highlighted in the NDIS Review's recommendation around this valuable service is welcome.

However, this is not the only way in which General Foundational Supports could support carers. For example, people consulted to develop Mental Health Australia and the National Mental Health Consumer and Carer Forum's Advice to Governments on Evidence Informed and Good Practice Psychosocial Services also valued other family focussed services such as Open Dialogue, the NSW Family and Carer Mental Health Program and carer respite.¹³

- Open Dialogue "encourages families to meet immediately and frequently after referral
 to openly explore acute mental health crises. The approach aspires to create a space
 where decision making is transparent and service users are able to find new words for
 their experiences. [Open Dialogue] privileges community treatment over
 hospitalisation."14
- Through the New South Wales Family and Carer Mental Health Program, community managed organisations provide "community based education and training, individual support and advocacy services, and planning and infrastructure support for mental health carer support groups." An evaluation of the program found that the majority of carers accessing the program reported the services and support offered by the program had a positive impact on their health and wellbeing and on the person they support and resulted in decreased levels of stress among carers. 16
- It is widely accepted that respite is critical for the wellbeing of mental health carers and the sustainability of the caring role.

Recommendation 3:

Family capacity building supports funded through General Foundational Supports should include supports designed specifically for mental health carers, which could include family psychosocial education, family focussed services similar to the NSW Family and Carer Mental Health Program, family focussed interventions, for example, Open Dialogue, and carer respite.

¹⁶ Rob Gordon, Pam Grootemaat, Carol Loggie, Mijanur Rahman & Peri O'Shea, *Evaluation of NSW Family and Carer Mental Health Program* (2022), 2, https://www.health.nsw.gov.au/mentalhealth/Documents/fcmhp-fin-rpt-jan22.pdf.



¹¹ Dr Laura Hayes, Dr Lisa Brophy, Professor Carol Harvey, Professor Helen Herrman, Professor Eoin Killackey and Juan Jose Tellez, Effective, evidence-based psychosocial interventions suitable for early intervention in the National Disability Insurance Scheme (NDIS): promoting psychosocial functioning and recovery (2016) 79,

https://www.mindaustralia.org.au/sites/default/files/2023-

 $^{05 \}dot{/} Effective_evidence_based_psychosocial_interventions_full_report.pdf.$

¹² Dr Laura Hayes, Dr Lisa Brophy, Professor Carol Harvey, Professor Helen Herrman, Professor Eoin Killackey and Juan Jose Tellez, Effective, evidence-based psychosocial interventions suitable for early intervention in the National Disability Insurance Scheme (NDIS): promoting psychosocial functioning and recovery (2016), 81, https://www.mindaustralia.org.au/sites/default/files/2023-

^{05/}Effective_evidence_based_psychosocial_interventions_full_report.pdf.

¹³ Mental Health Australia and the National Mental Health Consumer and Carer Forum, *Advice to governments: evidence-informed and good practice psychosocial services* (2024), https://mhaustralia.org/submission/advice-governments-evidence-informed-and-good-practice-psychosocial-services.

¹⁴ Abigail Freeman, Rachel Tribe, Joshua Stott, Stephen Pilling, "Open Dialogue: A Review of the Evidence," Psychiatric Services (2019), https://ps.psychiatryonline.org/doi/full/10.1176/appi.ps.201800236.

¹⁵ Rob Gordon, Pam Grootemaat, Carol Loggie, Mijanur Rahman & Peri O'Shea, *Evaluation of NSW Family and Carer Mental Health Program* (2022), 12, https://www.health.nsw.gov.au/mentalhealth/Documents/fcmhp-fin-rpt-jan22.pdf.

Community capacity building supports

In terms of community capacity building, there are a number of initiatives which could assist organisations to become more inclusive places for people with psychosocial disability.

For example, General Foundational Supports should fund initiatives designed to reduce stigma and discrimination faced by people with psychosocial disability. These initiatives should be aligned with the National Mental Health Commission's National Stigma and Discrimination Reduction Strategy, which was provided to Government following an extensive consultation process¹⁷ but for which there has not yet been a public government response.

General Foundational Supports should fund mental health awareness and response programs, particularly those led and delivered by people with lived experience of mental ill-health, carers, family and supporters. These sorts of programs can assist people to understand mental ill-health and better respond when people are demonstrating symptoms of mental ill-health.

In addition, General Foundational Supports should fund training for mainstream services in trauma-informed care and practice. A trauma-informed approach acknowledges the neurological, biological, and psychosocial impacts of trauma and its prevalence. It means committing to actively creating physical, psychological, and emotional safety for people with psychosocial disability, family, carers, supporters and service providers. This would enable organisations to create environments that are safe and respond well to the impact of trauma – to at a minimum reduce the risk of retraumatising people, and at best actively assist people with post traumatic growth.

In addition, mainstream organisations that regularly provide services to people with psychosocial disability would benefit from training in supported decision making, which is described in detail under the above section titled 'Individual capacity building supports'.

Finally, it is important to note that delivery of the above-mentioned training programs in trauma-informed care and practice and supported decision making would not aim to train workers to deliver specialist trauma response or supported decision making services. Instead, it would better equip organisations delivering mainstream services to deliver safer and more inclusive responses to functional impairments related to psychosocial disability and/or the experience of trauma and appropriately and warmly refer to more specialised services as the need arises.

Recommendation 4:

To build the capacity of the community to be more inclusive and responsive to the needs of people with psychosocial disability, General Foundational Supports should fund stigma reduction initiatives, mental health awareness and response programs, and training for mainstream services in trauma-informed care and practice and supported decision making.

¹⁸Mental Health Coordinating Council, "Trauma-informed care and practice", accessed November 25, 2024, https://mhcc.org.au/publication/trauma-informed-care-and-practice-ticp/.



¹⁷ National Mental Health Commission, "National Stigma and Discrimination Reduction Strategy", last updated August 26, 2024, https://www.mentalhealthcommission.gov.au/projects/stigma-and-discrimination-reduction-strategy.

Quality, safety and accountability

In funding appropriate services for people with psychosocial disability through General Foundational Supports, it is imperative that Governments ensure the supports delivered are of appropriate quality and safe for the people using them. This requires funding for the services that covers the real cost of service delivery, workforce development amongst multiple competing reforms, and ensuring service models can be adapted to ensure cultural safety and responsiveness for different population groups.

As Mental Health Australia and others have previously raised, feedback from our members indicates that current NDIS pricing fails to cover the real cost of delivering psychosocial disability support services.¹⁹ This has led to major specialist service providers pulling out of delivering NDIS supports entirely. It is imperative that the Government does not make the same mistake in implementing General Foundational Supports. General Foundational Support funding approaches need to account for the real cost of service delivery, which includes:

- back-end costs (such as insurance and office running costs)
- professional development
- good wages that attract skilled staff
- indexation that keeps pace with the real cost of delivering the service and particularly mandated wage increases
- one on one professional supervision this is a specific type of supervision that engages workers in reflective practice and is critical to delivering safe and quality psychosocial support
- ability to respond to complex needs, for example, sending two workers if attending a home visit in an unsafe location
- the need for collaboration across services in order to deliver effective support
- investment in quality improvement
- investment in monitoring and evaluation.

In addition to funding to cover the real cost of delivering a service, General Foundational Supports should be implemented in a manner that nurtures and expands the psychosocial support workforce. The psychosocial disability sector is working through multiple simultaneous reforms, including in response to the NDIS Review (including creation of a psychosocial early intervention service and Foundational Supports outside the NDIS) and Australian Governments' response to the Analysis of Unmet Need for Psychosocial Support outside the NDIS. The sector is also facing a funding cliff for services funded until 30 June 2025 under the Commonwealth Psychosocial Support Program, with no funding certainty beyond that point.

 Mental Health Australia, Submission to the National Disability Insurance Scheme Review (2023), https://mhaustralia.org/sites/default/files/docs/final_-_mental_health_australia_submission_to_the_ndis_review_-_18_may_2023.pdf.

 Mental Illness Fellowship Australia, Mental Health Australia and Community Mental Health Australia, Submission to the National Disability Insurance Scheme Review (2022), https://mhaustralia.org/sites/default/files/docs/final_joint_submission_-_mha_cmha_mifa_-_ndis_review_-_ _16_december_2022.pdf.



¹⁹ See for example:

The uncertainty of this environment puts a strain on organisations and workers, as will the need to grow the workforce in order to implement General Foundational Supports. In this environment Governments need to actively strengthen the psychosocial support workforce and communicate early and clearly about not only the implementation of General Foundational Supports but also other psychosocial workforce related reforms. This includes but is not limited to implementation of the National Mental Health Workforce Strategy and in particular standing up the new national peer workforce association promised in the 2024-25 Budget. More information on other critical success factors for effective implementation of General Foundational Supports is provided in the following section.

More broadly, in addition to strengthening the psychosocial support workforce more attention needs to be paid to NDIS market and broader disability ecosystem stewardship, including a specific focus on psychosocial support ecosystem stewardship. Market stewardship has been a vexed issue throughout the life of the NDIS with several reviews indicating a range of ongoing market challenges. Most recently the NDIS Review found that "Governments, as market stewards, should be more active and flexible to help ensure NDIS markets work for everyone, everywhere." The NDIS Review made a range of specific recommendations around how governments could achieve this including through both market stewardship for those services delivered through the NDIS and stewardship of the unified ecosystem they envisage of disability supports, including foundational supports. Governments must not repeat failures to adequately steward the NDIS market in implementing Foundational Supports. Efforts should be made to actively steward this new system of disability supports to ensure people can receive quality and safe services across the country.

Ensuring safe and quality services also requires adaptation to suit the needs of different communities. Supports should be tailored for location and for the population they are implemented within, including applying a social and emotional wellbeing lens to services designed to benefit First Nations people and tailored approaches for services designed to benefit culturally and linguistically diverse populations, the LGBTIQ+ community and in regional and remote Australia. Flexibility for implementation to be led by local, culturally appropriate and trusted organisations is imperative to ensuring services are culturally safe and appropriate to the context they are delivered in.

Recommendation 5:

In order to ensure delivery of quality and safe General Foundational Supports to people with psychosocial disability, Australian Governments should ensure:

- General Foundational Supports funding covers the real cost of psychosocial support delivery
- implementation of General Foundational Supports strengthens the psychosocial support workforce

²² NDIS Review, *Working together to Deliver the NDIS: Independent Review into the National Disability Insurance Scheme: Final Report* (2023),181, https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf.



²⁰ Australian Government Department of Health and Aged Care, *Budget 2024-25: Budget Overview* (2024), https://www.health.gov.au/sites/default/files/2024-05/budget-2024-25-budget-overview.pdf.

²¹NDIS Review, *Working together to Deliver the NDIS: Independent Review into the National Disability Insurance Scheme: Final Report* (2023), 179, https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf.

- appropriate infrastructure is in place to effectively steward the ecosystem of foundational supports to ensure quality and safe services are available to people who need them
- the design and implementation approach for General Foundational Supports and other reforms relevant to the psychosocial support workforce is communicated early and clearly to the psychosocial support sector
- services are appropriate to the community they are delivered within, particularly when serving First Nations people, people in rural and remote Australia, people from culturally and linguistically diverse backgrounds and people from the LGBTIQ+ community.

Critical success factors for implementation

The implementation of General Foundational Supports is a major system reform. As such, a best practice approach to reform implementation should be applied. This should include careful consideration of appropriate sequencing that takes into account intersecting reforms, including appropriate coordination by governments; genuine design with people with disability, their families, carers, and supporters and other key stakeholders; careful consideration of the level and pace of change that is feasible to implement; continuous and independent evaluation; and early, frequent and transparent communications with everyone impacted by the change.

The NDIS Review advised that "implementation [of its recommendations] should be sequenced strategically to address critical dependencies, manage risks and mitigate or minimise disruptions for participants, providers and workers."²³ It specifically highlighted Foundational Supports should be implemented in the short term.²⁴ Appropriate sequencing will be important to ensure Foundational Supports (including targeted Foundational Supports for people with psychosocial disability) are in place before other related reforms, such as the implementation of a psychosocial early intervention pathway are introduced, the success of which will be dependent upon a well-functioning Foundational Supports system being in place.

The NDIS Review also found that a well-coordinated national effort is required to deliver the changes it recommended.²⁵ This is no less true for psychosocial supports in particular. As mentioned above, psychosocial supports are currently undergoing multiple reforms, one of which is Australian Governments' response to the Analysis of unmet need for psychosocial supports outside the NDIS. Through the National Mental Health and Suicide Prevention Agreement governments committed to undertake this analysis and design future

²⁵ NDIS Review, *Working together to Deliver the NDIS: Independent Review into the National Disability Insurance Scheme: Final Report* (2023), 271, https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf.



²³ NDIS Review, *Working together to Deliver the NDIS: Independent Review into the National Disability Insurance Scheme: Final Report* (2023), 270, https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf.

²⁴ NDIS Review, *Working together to Deliver the NDIS: Independent Review into the National Disability Insurance Scheme: Final Report* (2023), 270, https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf.

arrangements for psychosocial supports.²⁶ The NDIS Review recommended "National Cabinet should agree to jointly invest in psychosocial supports outside the NDIS to assist people with severe and persistent mental ill-health currently unable to access supports"²⁷ and that "All Australian governments should prioritise supports for people with psychosocial disability as a part of general foundational supports".²⁸ It will be important to have clarity on which government agency will lead investment in psychosocial supports and what the governance arrangements are so there are clear roles and responsibilities and accountability for delivering change, including where there are intersecting reforms.

The NDIS Review outlined that a best practice approach to implementation would include (among other more specific elements) genuine design with people with disability, their families, carers, disability representative organisations and service providers, an inclusive and proportional approach to testing all new processes, design of culturally safe and tailored approaches, continuous and independent evaluation and frequent and transparent communications with stakeholders.²⁹ These elements offer a sound starting point for Australian Governments to consider in implementing Foundational Supports. In addition, the NDIS Review also made a range of specific recommendations about establishing appropriate architecture to implement the reforms.

It will be important for the Australian Government to clearly articulate its approach to managing the significant change that is NDIS reform following the NDIS Review, including Foundational Supports. The underlying principle of this approach should be that existing participants, family, carers and supporters and others impacted by the changes should experience a smooth and fair transition.³⁰

Recommendation 6:

In its response to the NDIS Review Australian Governments should clearly articulate their approach to, and relevant infrastructure to support, a smooth transition across implementation of the NDIS Review's recommendations, including Foundational Supports.

³⁰ NDIS Review, *Working together to Deliver the NDIS: Independent Review into the National Disability Insurance Scheme: Final Report* (2023), 273 https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf.



²⁶ Australian Governments, *National Mental Health and Suicide Prevention Agreement* (2022), 29, https://federalfinancialrelations.gov.au/agreements/mental-health-suicide-prevention-agreement.

²⁷ NDIS Review, *Working together to Deliver the NDIS: Independent Review into the National Disability Insurance Scheme: Final Report* (2023), 4, https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf.

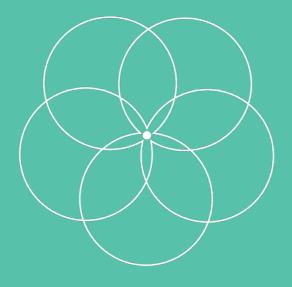
²⁸ NDIS Review, *Working together to Deliver the NDIS: Independent Review into the National Disability Insurance Scheme: Final Report* (2023), 8, https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf.

²⁹ NDIS Review, *Working together to Deliver the NDIS: Independent Review into the National Disability Insurance Scheme: Final Report* (2023), 272-273, https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf.

Conclusion

Mental Health Australia looks forward to continuing to advise the Department of Social Services with practical policy solutions in designing implementation of General Foundational Supports. Governments have an opportunity to implement the NDIS Review's vision of a connected system of support for all people with disability. It is critical that this system of support is inclusive of and safe for people with psychosocial disability, family, carers and supporters, and as recommended by the NDIS Review, should include specific psychosocial supports. Mental Health Australia is pleased to provide the Australian Government the recommendations outlined in this submission, informed by our members, to improve supports for people with lived experience of psychosocial disability, family, carers and supporters and progress towards a truly inclusive and accessible community.





Mental Health Australia

Mentally healthy people, mentally healthy communities

mhaustralia.org

Mental Health Australia is the peak independent national representative body of the mental health sector in Australia.

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