

Department of Health, Disability and Ageing
GPO Box 9848
Canberra ACT 2601
Australia
SCCreform@health.gov.au

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Attention: Department of Disability, Health and Ageing, SCC Reform Team

Please accept this letter as Children and Young People with Disability Australia's (CYDA) submission to the Department of Health, Disability and Ageing's consultation on Support Coordination and Connection (SCC). We appreciate the opportunity to provide comment on this important work.

About CYDA

CYDA is the national representative organisation for children and young people with disability, aged 0–25 years. Our vision is that children and young people with disability fully exercise their rights, realise their aspirations, and thrive in inclusive communities. Our work centres on rights-based advocacy, lived experience, and evidence-informed policy.

We acknowledge the Traditional Custodians of the Lands on which this submission has been written, and pay our respects to their Elders past and present. This is, was, and always will be Aboriginal Land.

Background: Children and young people with disability and the NDIS

Children and young people represent a significant and growing proportion of people with disability in Australia. In 2022, around 12.1 per cent of children and young people aged 0–24 years had disability, with six per cent considered to have very high support needs.¹ Most required assistance with everyday activities, and over half experienced multiple types of disability, reflecting the complexity of supports required for this group.

The NDIS has played an important role in the lives of children and young people. Compared with the broader disability population, participants in the Scheme are much younger. 52 per cent of all participants are aged 18 and under, and 67 per cent of new participants are aged under 15.² Eligibility rates are highest for young applicants.³

CYDA's work on support coordination

In this submission we draw on our previous work related to NDIS reforms, including support coordination (see Appendix for detail):

- CYDA's submission to the NDIS Support Coordination discussion paper
- CYDA's national survey of 1535 young people with disability, their families and caregivers on NDIS support needs in relation to Thriving Kids
- CYDA's national survey of 222 children and young people with disability, their parents and caregivers about NDIS eligibility reassessments
- CYDA's submission to the Independent Review of the NDIS.

CYDA consistently hears that support coordination provides invaluable support to children, young people with disability and families, particularly those accessing the NDIS for the first time. For it to be most effective, support coordination for children and young people must be funded at an appropriate level and quality, and it should be delivered by professionals with appropriate understanding of disability, inclusion best practice, and general childhood development.

General comment

CYDA welcomes the Department of Health, Disability and Ageing (the Department)'s consultation on NDIS Support Coordination and Connection (SCC) Reform as an opportunity to share insights from the perspectives and experiences of children and young people with disability. This is CYDA's second in a series of three submissions to the current round of NDIS reform consultations.

It is CYDA's view that NDIS reforms, as brought about by the National Disability Insurance Scheme Amendment (Securing the NDIS for Future Generations) Bill 2026, are incompatible with both international and national disability policies and legislation focused on rights, protections, and inclusion. This includes Australia's obligations under the United Nations Convention on the Rights of Persons with Disabilities⁴ and Convention on the Rights of the Child⁵, the final recommendations of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability,⁶ and the inclusive vision of Australia's Disability Strategy 2021-31.⁷

CYDA notes that the measures being introduced infringe on the rights of children and young people with disability to "an adequate standard of living, equality and non-discrimination, health, privacy and social security," as raised by Parliament's Human Rights Committee.⁸

The following recommendations provide practical steps to support implementation of the NDIS reforms in ways that uphold the rights of children and young people with disability. They focus on embedding rights, inclusion, choice and control in NDIS policy and practice, while putting safeguards in place to identify and address ableism and prevent further inequity.

CYDA's Summary of Recommendations

Our recommendations are focused on answering the discussion paper questions under the section about service provider models and approaches.

1. Commissioning arrangements based on quality, choice and control, and equitable coverage to regional and remote areas

Recommendation 1.1 Appoint lived experience positions on SCC service commissioning panels

Recommendation 1.2 Support individualised, age-appropriate plans and continuity of care

Recommendation 1.3 Undertake equity-weighted regional commissioning

2. Workforce capability building and expertise

Recommendation 2.1 Instate a minimum quota of lived experience staff across SCC providers

Recommendation 2.2 Train SCC providers to support the unique needs of children and young people with disability

Recommendation 2.3 Align SCC service quality assurance, skills, and knowledge to the National Best Practice Framework for Early Childhood Intervention

3. Transition arrangements, local knowledge, and community connection

Recommendation 3.1 Provide participants with assistance and support to access local networks, informal supports, and community connections

Recommendation 3.2 Guarantee continuity of care pathways in the future SCC model

Recommendation 3.3 Undertake coordinated service planning to maximise local knowledge

CYDA's Recommendations in detail

1. Commissioning arrangements based on quality, choice and control, and equitable coverage to regional and remote areas

This section responds to discussion paper questions under the section about service provider models and approaches:

Question 1—Commissioning arrangements that support quality, choice and control

Question 4—Support coordination service areas

Question 10—Supporting participants in thin markets (such as regional and remote)

Recommendation 1.1 Appoint lived experience positions on SCC service commissioning panels

To ensure providers reflect what participants determine as high-quality service provision, lived experience input into selection of providers is crucial. CYDA strongly recommends the Department follow the best practice approach of appointing lived experience positions to commissioning panels. Representation should be from a range of participants, including young people with disability. Best practice examples include the Australian Capital Territory Government's panel for including lived experience in the human services and health sectors, as well as the Mental Health Commission of New South Wales's framework for embedding lived experience across the mental health service sector.⁹ Lived experience positions can also foster continuous improvement and improve the sharing of best practice through user testing, monitoring, and evaluation processes. Young people want to see clear mechanisms for feedback and continuous improvement across services, especially during major reforms and transition times.

Recommendation 1.2 Support individualised, age-appropriate plans and continuity of care

To ensure choice and control in support coordination, provision must be flexible and responsive to be able to adapt to the individualised, age-appropriate needs of children and young people with disability through different stages of development and transition. In a recent 2025 survey conducted by CYDA on disability support needs in the context of Thriving Kids, parents and caregivers told us that age matters in determining support needs: early childhood aged-children (0-9 years) need individualised foundational therapy plus family capacity-building; middle years (10-14 years) need school-day adjustments and peer participation; while teens (15-17 years) and young adults (18-25 years) need mental-health, transitions, life-skills, and employment supports. Supports must also allow for continuity of care, with all age groups emphasising the importance of relationships to service quality.¹⁰

Recommendation 1.3 Undertake equity-weighted regional commissioning

CYDA recommends that any commissioning approach to regional and remote areas is equity weighted, considering a variety of factors, features and circumstances of both locations and participants in these areas. Equity weighting may include service availability, level of remoteness, and demographic analysis. NDIS participant experiences in regional and remote areas have been well-documented in the 103 submissions to the Joint Standing Committee Inquiry into NDIS participant experience in rural, regional and remote Australia.¹¹ Key issues include long wait times for services, lack of availability, responsiveness and effectiveness of support that impacts choice and control. These issues can be exacerbated in very remote locations and/or when intersectional factors are present such as age, gender, culture or socioeconomic status.

2. Workforce capability building and expertise

This section responds to discussion paper questions under the section about service provider models and approaches:

Question 5—Workforce and service capacity factors to manage variable need

Question 7—Quality, workforce and safeguarding requirements for SCC providers

Question 8—Workforce capability in the future SCC model

Recommendation 2.1 Instate a minimum quota of lived experience staff across SCC providers

There is currently no mandated minimum quota for the NDIA or any other Australian employer to employ people with disability.¹² CYDA recommends employing people with lived experience across the disability ecosystem, including in the future SCC service, with a minimum quota for all participant-facing roles. Lived experience staff bring unique understanding, skills, and knowledge that can uplift capability in the workforce, as well as acting as role-models for peer and community connection and career pathways to participants who are children and young people with disability. This quota should be supported by lived experience workforce guidelines, to ensure successful implementation.¹³

Recommendation 2.2 Train SCC providers to support the unique needs of children and young people with disability

CYDA has heard from children and young people with disability, their parents and caregivers that age-appropriate, neuro-affirming, and disability-affirming support is vital to ensure a strengths and rights-based approach to service provision.¹⁴ CYDA therefore recommends comprehensive training and support is provided for Support Coordinators involved in supporting children and young people with disability at all

life stages. It is imperative that staff understand the critical significance of adeptly addressing the unique requirements of children and young individuals navigating pivotal life transitions. This encompasses a deep grasp of social, biological, and identity-related challenges. By arming the workforce with these insights, this will ensure a more sensitive and effective approach to serving this demographic, ultimately fostering their holistic development and well-being.

Recommendation 2.3 Align SCC service quality assurance, skills and knowledge to the National Best Practice Framework for Early Childhood Intervention

In addition to training the workforce, an overarching framework against which to benchmark quality assurance, skills and knowledge is needed. CYDA recommends that the new SCC service aligns its quality assurance measures and skills and knowledge assessments against the National Best Practice Framework for Early Childhood Intervention,¹⁵ to ensure that it is meeting evidence-based standards for service provision to children and young people with disability.

3. Transition arrangements, local knowledge, and community connection

This section responds to discussion paper questions under the section about service provider models and approaches:

Question 9—Defining and assessing local knowledge and community connection

Question 12—Transition arrangements to support successful implementation

Recommendation 3.1 Provide participants with assistance and support to access local networks, informal supports, and community connections

CYDA recommends additional wraparound supports are built into the future SCC service model, that enable children and young people with disability, their families and caregivers to embed in, and coordinate, formal and informal local supports. Families of children and young people with disability have told us repeatedly of the burnout and burden they face in navigating services and supports.¹⁶ Stressors include the need for multiple service agreements and service providers, the fragmentation of services, finding and understanding the supports that are available, increased time investment, and managing staff. They have voiced the need for more support with accessing local networks, information, informal supports and community connections, especially peer supports.¹⁷ A holistic SCC model focused on connecting families in with their communities would assist in alleviating this burden and providing a starting point for families.

For this recommendation, CYDA also acknowledges and supports the advocacy outlined in the Child and Family Disability Alliance (CAFDA)'s submission to this consultation. CAFDA is a national partnership of not-for-profit family-led organisations: the Association for Children with Disability, Kiind, and Belongside Families.

Recommendation 3.2 Guarantee continuity of care pathways in the future SCC model

CYDA is concerned that under the future SCC service model, some participants may need to change providers, and providers will only be able to offer specific services within their remit. Children and young people with disability, their parents and caregivers have told us that ongoing, trusted relationships with providers are very important.¹⁸ Especially when complex needs are present, support workers can take on a variety of roles that do not fit neatly into one category. Families also repeatedly mention the significant extra work that is required to transition to and use the NDIS effectively. It is therefore crucial that during transition times, children and young people with disability can maintain continuity of care with their trusted service providers. This is important both to maintain choice and control, and to ensure that there is flexibility and responsiveness within the model to meet complex needs.

Recommendation 3.3 Undertake coordinated service planning to maximise local knowledge

CYDA is generally supportive of ensuring more streamlined service provision through the future SCC service model, if it accounts for the need for flexibility, responsiveness, choice and control. When children and young people are accepted onto the NDIS, its complexity often leaves families struggling to make sense of the systems, language and processes. The administrative burden placed on carers and families can be significant and overwhelming. CYDA therefore recommends that the future SCC service model takes an ecosystem approach to service planning and implementation, to ensure that participants are connected in with local knowledge and services. This should include culturally and intersectionally responsive services where needed, such as Aboriginal Community Controlled Organisations, Aboriginal Community Controlled Health Organisations, LGBTIQ+ organisations (preferably Rainbow Tick accredited), and multicultural organisations. It should also be accompanied by workforce training and clear accountabilities to ensure continuity of support across systems such as education, health and child protection.¹⁹

Thank you again for the opportunity to make a submission. If you have any questions about CYDA's submission, please contact CYDA's Head of Policy and Research at lizhudson@cyda.org.au.

Yours sincerely



Dr Liz Hudson
Acting CEO, Children and Young People with Disability Australia

Appendix: CYDA's NDIS-related submissions and reports

CYDA's work is rights-based and informed by the direct experiences and diverse voices and visions of children and young people with disability across Australia. CYDA grounds its work in evidence and a human rights approach. This submission is supported by CYDA's previous work in this area as listed below:

CYDA (2020) [Response to NDIS Support Coordination Discussion Paper](#)

CYDA (2023) [Submission to the NDIS Review's Consultation into NDIS Participant Safeguarding](#)

CYDA (2023) [Submission to the Independent Review of the NDIS](#)

CYDA (2024) [Submission to the NDIS Provider and Worker Registration Taskforce](#)

CYDA (2024) [Submission to the Draft Lists of NDIS Supports](#)

CYDA (2025) [Submission to the NDIS Quality and Safeguards Commission's Consultation on the Registration of Platform Providers](#)

CYDA (2026) [Submission to NDIS Integrity and Safeguarding Amendment Bill 2025](#)

CYDA (2026) [Submission to the Getting it Right: A New Definition for NDIS Providers Consultation](#)

CYDA (2026) [Submission to the NDIS Evidence Advisory Committee Consultation](#)

CYDA (2026) [Submission to the Inquiry into the Integrity of the NDIS](#)

CYDA (2026) [Submission to the Inquiry into the NDIS \(Securing the NDIS for Future Generations\) Amendment Bill 2026](#)

Endnotes

¹ Australian Bureau of Statistics (2026) [Children and Young People with Disability, 2022 findings](#)

² National Disability Insurance Agency (2026) [NDIS Quarterly Reports 2025-6 Q4](#)

³ Australian Institute of Health and Welfare (2024) [People with Disability in Australia](#)

⁴ United Nations (2006) [Convention on the Rights of Persons with Disabilities](#)

⁵ United Nations (1989) [Convention on the Rights of the Child](#)

⁶ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (2023) [Final Report](#)

⁷ Department of Social Services (2024) [Australia's Disability Strategy 2024 Update](#)

⁸ Parliamentary Joint Committee on Human Rights, NDIS Amendment Bill 2026, [Report 6 of 2026](#); AUPJCHR 47

⁹ ACT Government (2024) [Lived Experience Engagement Advisory Panel](#); Mental Health Commission NSW (2018) [Lived Experience Framework for NSW](#)

¹⁰ CYDA (2025) [Masking is Not Thriving Report](#)

¹¹ Parliament of Australia (2024) [Submissions to the Inquiry into NDIS Participant Experience in Regional, Remote and Rural Australia](#)

¹² Mellifont et al. (2023) [Australia is lagging when it comes to employing people with disability](#)

¹³ National Mental Health Commission (2025) [Lived Experience Workforce Guidelines](#)

¹⁴ CYDA (2025) [Masking is Not Thriving Report](#); CYDA (2025) [NDIS Eligibility Reassessments Report](#)

¹⁵ Department of Disability, Health, and Ageing (2025) [National Best Practice Framework for Early Childhood Intervention](#)

¹⁶ CYDA (2025) [Masking is Not Thriving Report](#); CYDA (2025) [NDIS Eligibility Reassessments Report](#); CYDA (2026) [Submission on the NDIS Amendment \(Securing the NDIS for Future Generations\) Bill 2026](#)

¹⁷ CYDA (2025) [Self-Directed Supports submission](#)

¹⁸ CYDA (2025) [Masking is Not Thriving Report](#)

¹⁹ CYDA (2023) [Submission to the Independent Review of the NDIS](#)