



**Submission to the Senate Standing Committee on Community
Affairs Inquiry into the Disability Services and Inclusion Bill
2023 [Provisions] and Disability Services and Inclusion
(Consequential Amendments and Transitional Provisions)
Bill 2023**

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Who is the Assistive Technology Suppliers Australia?

ATSA is a national organisation representing assistive technology suppliers, including manufacturers, importers, distributors, retailers, tradespeople and technicians.

Our 170 members comprise businesses and not-for-profit organisations and range from small family-owned concerns to multinational organisations throughout Australia. It is estimated that, excluding AT for communication and sensory disabilities, approximately 80% of the AT in Australia passes through the hands of ATSA members.

ATSA is a registered not-for-profit charity with the ACNC and requires its members to adhere to a comprehensive Code of Practice on the provision, sales and servicing of AT. We are also a member of the Australian Ethical Health Alliance.

The objects of ATSA are

- (a) funding and promoting:
 - i) research into Assistive Technology;
 - ii) the education of the public as to the availability of Assistive Technology to meet the needs of persons with a disability;
 - iii) “Best practice” in the way Assistive Technology is supplied; and
 - iv) community accessible Assistive Technology events;
- (b) giving the Assistive Technology users and suppliers a voice that:
 - i) provides positive influence on Government policy;
 - ii) educates Governments and other stake holders about Assistive Technology;
 - iii) promotes a robust competitive and commercially viable marketplace with the aim that Assistive Technology is available to users at a reasonable cost;
 - iv) advocates to achieve excellence, quality, value and positive outcomes for suppliers, Assistive Technology users, stakeholders and the broader community;
 - v) works with governments at all levels to ensure the viability of the Assistive Technology industry for the sake of those who use Assistive Technology; and
 - vi) delivers quality and value in Assistive Technology solutions for people with a disability and their carers;
- (c) improving the quality of Assistive Technology provision by:
 - i) supporting the ongoing training and education of health care professionals;
 - ii) promoting ethical business practices that safeguard the interests of users of Assistive Technology;
 - iii) participating in the development of appropriate and cost-effective product standards; and
 - iv) maintaining and enhancing services standards, quality and reputation of the Members for the collective mutual benefit and interests of the Members and the public;
- (d) developing alliances with all industry stakeholders to:
 - i) drive continued improvement in outcomes for Assistive Technology users;
 - ii) minimise the total lifetime costs of Assistive Technology on society and Assistive Technology users;
 - iii) ensure an open, fair and competitive market; and
 - iv) promote the services, activities and events of the Company; and
- (e) undertaking such other actions or activities that are necessary, incidental or conducive to advance this Object.

Recommendations

Recommendation 1

The Explanatory Memorandum expands on the term 'payment arrangements' to clarify this could include contracts and procurement.

Recommendation 2

Certification and compliance requirements should be commensurate to the service provided, and could align with existing NDIS provider or other relevant compliance processes already in place when a provider does not have existing accreditation/certification

Recommendation 3

ATSA recommends a co-design process be implemented for the development of complaint and incident reporting systems for small business providers

Recommendation 4

The definition for SES be included in the Disability Inclusion Bill

Introduction

Assistive Technology Suppliers Australia (ATSA) thanks the Senate Standing Committee on Community Affairs for the opportunity to provide feedback to the inquiry.

ATSA supports both the concept of the Disability Inclusion Bill 2023 and the initiatives therein.

The members of ATSA provide assistive technology (AT) products to people with disability and older persons, including medical devices such as wheelchairs, hoists and beds. They also provide

- education on how to safely use the AT to people with a disability and their support team such as carers, family, allied health professionals and AT Mentors.
- trials so that people with a disability can ensure the AT is right for them and their local environment
- maintenance and repairs
- emergency back-up services
-

ATSA is pleased to see that this Bill aims to align services and supports in order to provide national consistency, and to the extent possible, ensure these are locally available and integrated with general services available to the wider population.

ATSA would also wish to see identified means within this Bill to ensure the participation of States and Territories in the equitable implementation of the requirements of the Act.

General Comments

1. Financial arrangements

In Minister Rishworth's second reading to the House of Representatives to present this Bill, she referred to "contracts and procurement" as possible alternative payment arrangements. We note the Bill states "The Minister may, on behalf of the Commonwealth, make, vary or administer an arrangement for the making of payments by the Commonwealth to a person, or make, vary or administer a grant of financial assistance to a person, in relation to one or more of the following activities (the **eligible activities**):

- (a) the provision of accessibility supports or services;"

It would be helpful to provide further clarification about the payment arrangements in the Explanatory Memorandum.

Recommendation 1

The Explanatory Memorandum expands on the term 'payment arrangements' to clarify this could include contracts and procurement.

2. Certification

In the Assistive Technology sector, a number of suppliers currently hold the ISO 9001 certification while others adhere to the NDIS compliance requirements.

We estimate that around 60% of suppliers would be classified as either 'small or very small' businesses and would therefore find the ISO level of compliance to be too onerous for the size of their business. ATSA therefore recommends that any provider who comes under this new legislation should automatically be required to adhere to a level of compliance commensurate with the size of the business and the type of activities the business provides.

Recommendation 2

Certification and compliance requirements should be commensurate to the service provided, and could align with existing NDIS provider or other relevant compliance processes already in place when a provider does not have existing accreditation/certification.

3. Complaint and Incident Reporting systems

In regard to the implementation or improvement of complaint and incident reporting systems for small business providers who come under this Bill, it may be helpful for the Department of Social Services to co-design resources with small providers to ensure they can be implemented and utilised.

Recommendation 3

A co-design process be implemented for the development of complaint and incident reporting systems for small business providers.

4. Objects - rural and regional

ATSA strongly supports the intent of Object 3 h (ii) within the Bill to provide locally based supports and services. Approximately 24% of AT providers work in regional, rural and remote locations to support people living in these areas. There are many instances where people with a disability have needed additional support out of normal business hours and the ability to respond quickly can make a significant difference to a person's wellbeing and safety. This level of service can only be provided by a local AT provider.

5. Miscellaneous

Recommendation 4

SES to be added to the definitions section.