



Legislative Assembly for the
Australian Capital Territory

Standing Committee on Public
Accounts and Administration

Submission Cover Sheet

Inquiry into Specialist Disability Accommodation service delivery through Housing ACT

Submission number: 04

Submitter: ACT Disability Caucus

Date authorised for publication: 13 April 2026



ACT Down Syndrome Association & Intellectual Disability

Building 1, Pearce Community Centre, Pearce ACT, 2607

Advocacy for Inclusion

2.02 Griffin Centre, 20 Genge St Canberra City, 2601

Women with Disabilities ACT

Building 1, Pearce Community Centre, Pearce ACT, 2607

ACT Disability Caucus

**Submission to the Standing Committee on Public Accounts and
Administration Inquiry into Specialist Disability Accommodation
Service Delivery through Housing ACT**

April 2026

About the ACT Disability Caucus

The ACT Disability Caucus welcomes the opportunity to provide this submission to the Standing Committee on Public Accounts and Administration Inquiry into Specialist Disability Accommodation service delivery through Housing ACT.

The ACT Disability Caucus is a collaboration of Disabled People's Organisations in the ACT, including Advocacy for Inclusion, Women with Disabilities ACT, and Down Syndrome and Intellectual Disability ACT. The Caucus brings together lived experience, policy expertise, and systemic advocacy to advance the rights, inclusion, and wellbeing of people with disability.

The Caucus operates within a human rights framework and is strongly informed by the principles of the United Nations Convention on the Rights of Persons with Disabilities. It reflects the collective voice of people with disability in the ACT, with member organisations led by, and accountable to, people with disability.

This submission draws on experience across individual advocacy, systemic advocacy, and engagement with housing, disability, and government systems. It is informed both by direct advocacy work with people with disability and by broader policy analysis of how systems operate in practice.

The Caucus considers that the Housing ACT Specialist Disability Accommodation experience raises significant structural and policy issues that warrant close examination. This submission focuses on the interaction between disability housing policy and public housing systems, and the implications of implementation failure for people with disability.

Table of Contents

Introduction:	4
The ACT Disability Caucus Position:	4
The Housing ACT SDA Experience:.....	5
Structural Barriers:	6
Impact On Tenants With Disability:.....	6
Broader Policy Significance:.....	7
Recommendations:.....	8
Conclusion:	9
Authorised by:	9

Introduction:

This submission responds to the Standing Committee on Public Accounts and Administration Inquiry into Specialist Disability Accommodation service delivery through Housing ACT.

Specialist Disability Accommodation (SDA) was introduced through the National Disability Insurance Scheme as a mechanism to support housing for people with very high support needs or extreme functional impairment.¹ The framework is intended to ensure that people with disability who require specialised housing can live safely, independently and with dignity in homes designed to meet their needs.

Public housing systems play an important role in disability housing². However, the ACT experience raises questions about whether they are well suited to deliver SDA within their existing structures. Housing ACT manages significant housing stock and already houses many tenants with disability whose needs may align with SDA eligibility, but alignment in principle does not necessarily translate into delivery in practice.

The ACT experience therefore raises a critical question for disability housing policy. The issue is not simply whether SDA funding was accessed. The deeper question is whether the ACT public housing system could translate a specialist disability housing mechanism into actual service delivery, or whether this type of support would be better provided through alternative mechanisms.

The ACT Disability Caucus Position:

The ACT Disability Caucus considers that the Housing ACT SDA experience represents a failure of implementation rather than a missed funding opportunity.

Housing ACT entered the SDA framework and identified housing stock that could sit within it but did not develop the operational arrangements required to make the pathway function in practice. A pathway that was formally established but never operationalised is not a functioning system.

The result was that disability-related housing needs remained within standard public housing pathways rather than being met through the specialist pathway created for that purpose.

The ACT experience does not suggest a lack of potentially suitable housing stock. Rather, the issue arose at the point where policy intent needed to be translated into operational practice. This distinction matters. When specialist policy mechanisms fail to operate, responsibility does not disappear but shifts back onto existing systems that were never

¹ [SDA pricing and payments | NDIS](#) National Disability Insurance Agency, *Specialist Disability Accommodation (SDA) pricing and payments framework*.

² The ACT Government has reported that more than half of public housing households in the ACT include a person with disability (ACT Government, *Towards a 10-year ACT Disability Strategy: Listening Report* (2022), p. 13).

designed to carry that responsibility. For tenants with disability, the practical consequences are significant.

In addition to understanding the causes of the Housing ACT SDA experience, there is a need to consider under what conditions SDA could operate effectively in the ACT. This includes ensuring that SDA supports a diversity of housing options, promotes participant choice and control, and is responsive to local demand and community context.

This distinction is critical to ensuring that future policy responses focus on structural reform rather than retrospective attribution.

An effective SDA approach in the ACT should:

- Support a diversity of supply models across public, community and private sectors;
- Ensure housing is located in areas with opportunities for community engagement and access to services and transport;
- Avoid institutional or segregated models that lead to harm or constrain rights;
- Enable genuine participant choice and control, and;
- Involve Disabled People's Organisations in design, development, and oversight.

The Housing ACT SDA Experience:

Housing ACT registered as a Specialist Disability Accommodation provider in 2017 and enrolled 112 public housing dwellings within the SDA framework in 2020.³

Despite this step, the program did not proceed to operational service delivery. SDA funding was not claimed, and Housing ACT's SDA registration was allowed to lapse in December 2025.

The sequence of events is important. It shows that entry into the SDA framework did not lead to delivery. This is not a question of timing. It reflects a system that progressed to registration without developing the capability required to operate. Importantly, the ACT did not fail to identify suitable housing stock. Available information indicates that Housing ACT had already identified dwellings it considered capable of aligning with SDA design categories. The failure occurred at the point where implementation capability was required.

Housing ACT entered the SDA framework but did not establish the tenant engagement processes, contractual arrangements, information systems, or administrative structures needed to make the pathway function.

The enrolment of 112 dwellings therefore highlights the problem rather than diminishing it. The issue was not the absence of suitable housing. The issue was the absence of an operational model capable of delivering SDA through that housing.

³ [Exhibit-1-Tabled-document-from-Minister-Berry-Anunual-Reports-hearing-10-Nov-2025-Social-Policy.pdf](#) ACT Legislative Assembly, evidence tabled to the Standing Committee on Public Accounts and Administration indicating that Housing ACT registered as an SDA provider in 2017 and enrolled 112 dwellings in 2020.

Structural Barriers:

The available information suggests that the failure to operationalise SDA was not the result of a single decision, but the interaction of several structural barriers.

Public housing systems operate through means tested eligibility settings, and SDA does not align neatly with that structure. Housing ACT also did not necessarily hold direct tenancy relationships with all residents in relevant properties due to headlease arrangements involving community housing providers.

In addition, Housing ACT did not appear to have reliable visibility over which tenants were NDIS participants with SDA funding in their plans, making it difficult to identify and activate the intended pathway. Operationalising SDA also requires governance systems, tenant engagement processes, and compliance arrangements that do not appear to have been established.

These barriers do not operate in isolation. They compound over time, with each gap in information, governance, or tenancy structure increasing the difficulty of delivering SDA in practice. What emerges is not a single point of failure, but a system that is not configured to deliver specialist disability accommodation.

Taken together, these factors suggest a deeper policy issue. The ACT experience indicates that a traditional public housing system may not be well configured to function as an SDA provider without significant structural adaptation.

This reframes the issue for the Committee. The question is not simply why the program did not proceed, but whether the system, as currently structured, could deliver SDA at all.

Impact On Tenants With Disability:

For tenants with disability, housing policy failures are not abstract administrative issues.

Accessible housing determines whether a person can safely enter and leave their home, move independently within their living space, or use essential facilities such as bathrooms and kitchens.

Where specialist housing pathways do not operate, tenants with disability remain reliant on standard public housing processes to meet accessibility needs.

Through its member organisations' advocacy work, the ACT Disability Caucus regularly supports people with disability who require modifications such as ramps, bathroom alterations, handrails, widened doorways and other essential accessibility changes. Where responsibility for funding or delivery is unclear, or where systems do not coordinate effectively, tenants can experience lengthy delays that affect their ability to safely enter and leave their home, manage personal care, or maintain independence in daily life.

When specialist housing systems fail to operate, the consequences fall directly on people with disability. These impacts are not isolated. They accumulate over time, shaping a person's ability to live safely, independently and with dignity.

For this reason, the active involvement of people with disability and their representative organisations must be central to the design, development, and oversight of SDA pathways, ensuring that policy and delivery are informed by lived experience and responsive to actual need.

Broader Policy Significance:

The Housing ACT SDA experience should be viewed as more than a local administrative matter. It illustrates a broader structural issue at the intersection of disability policy and social housing systems.

The ACT also operates within a human rights framework through the Human Rights Act 2004 (ACT). Accessible housing plays a critical role in enabling people with disability to exercise rights relating to dignity, independence, and participation in community life. Where housing systems are unable to translate disability housing mechanisms into practical outcomes, the issue extends beyond administrative performance and engages fundamental human rights considerations.

SDA was designed as a specialist disability housing mechanism operating alongside the NDIS. Social housing systems were not redesigned when SDA was introduced. As a result, public housing providers may face structural barriers when attempting to participate in SDA frameworks.

The ACT case is particularly significant because the Territory progressed further than many jurisdictions. It registered as an SDA provider and enrolled housing stock. Yet the system did not progress to service delivery.

This experience points not only to failures in implementation, but to the need for a clearer model of how SDA should operate within the ACT context.

Without structural reform, social housing systems may struggle to translate specialist disability housing frameworks into practical outcomes. Policy mechanisms do not fail quietly. When they do not operate, their intended outcomes are absorbed by systems that were never designed to deliver them.

While the Terms of Reference focus on understanding the circumstances surrounding Housing ACT's SDA experience, this inquiry also provides an opportunity to consider how SDA can operate effectively in the ACT going forward.

The Committee has an opportunity to examine this issue in a way that contributes not only to ACT policy but to national discussions about the interaction between SDA and public housing systems.

The following recommendations are intended not only to assist in understanding how this outcome occurred in the ACT, but also to inform the development of a more effective and sustainable approach to delivering SDA in the ACT and elsewhere.

Recommendations:

The ACT Disability Caucus recommends that the Committee consider the following actions.

Recommendation 1:

That the ACT Government provide a clear public account of why the 112 enrolled dwellings did not proceed to operational SDA service delivery, including the role of tenancy structures, information gaps, administrative capacity, and governance arrangements.

Recommendation 2:

That the ACT Government review how disability-related housing needs are currently addressed in public housing where SDA is unavailable or not operational, including home modification processes, transfer pathways, and timeframes.

Recommendation 3:

That the ACT Government determine the appropriate role of Housing ACT in the delivery of SDA, including whether it should function as an SDA provider in the future. If this is not the intended role, the Government should identify alternative pathways through specialist providers or community housing organisations.

Recommendation 4:

That any future disability housing pathway involving public housing includes clear operational requirements before commencement, including tenant engagement processes, governance structures and information sharing systems capable of supporting implementation.

Recommendation 5:

That the ACT Government review disability housing pathways through a rights-based lens, including whether current arrangements ensure people with disability can secure accessible housing in a timely and effective way.

Recommendation 6:

That the ACT Government consider the establishment of an independent, expert mechanism with disability leadership to support the development of the Specialist Disability Accommodation market in the ACT.

Such a mechanism should have the capability to:

- Provide independent market analysis and advice;
- Coordinate between disability policy, housing systems, and investment settings;
- Support informed and sustainable investment in accessible housing, and;
- Ensure SDA funding is aligned with market development rather than embedded within provider or landlord structures.

Consideration should be given to governance arrangements that include the ACT Government, the NDIA and disability representative organisations, with leadership that reflects both lived experience of disability and expertise in housing investment.

Conclusion:

The Housing ACT SDA experience demonstrates that entering a policy framework does not guarantee service delivery.

The ACT identified suitable housing stock and entered the SDA framework. What was missing was the operational system needed to convert that policy mechanism into practical outcomes.

When specialist pathways fail to function, the consequences do not disappear. They fall back onto existing housing systems and onto tenants with disability themselves.

This inquiry provides an opportunity to understand not only what occurred, but what structural changes may be necessary to ensure disability housing mechanisms translate into real and accessible homes for the people they are intended to support.

Authorised by:

Kat Reed, CEO, Women with Disabilities ACT.
Shannon Kolak, CEO, ACT Down Syndrome and Intellectual Disability.
Nicolas Lawler, CEO, Advocacy for Inclusion.

Endorsements:

This submission is endorsed by the ACT Council of Social Service and ACT Shelter.

References:

Australian Housing and Urban Research Institute (AHURI) (2024). *Specialist Disability Accommodation in the social housing sector: Policy and practice*, AHURI Final Report 417.
[Research library | AHURI](#)

Australian Housing and Urban Research Institute (AHURI). *Housing for people with disability: policy and practice*, AHURI Research Report.
<https://www.ahuri.edu.au/research>

National Disability Insurance Agency (NDIA). *Specialist Disability Accommodation (SDA) pricing and payments framework*.
<https://www.ndis.gov.au/providers/housing-and-living-supports-and-services/specialist-disability-accommodation/sda-pricing-and-payments>

National Disability Insurance Agency (NDIA). *Specialist Disability Accommodation design standard*.
[SDA Pricing Review | NDIS](#)

Productivity Commission (2017). *National Disability Insurance Scheme (NDIS) Costs Study*. Australian Government Productivity Commission.
<https://www.pc.gov.au/inquiries/completed/ndis-costs/report>

ACT Legislative Assembly. *Evidence and documentation relating to Specialist Disability Accommodation enrolment of Housing ACT dwellings*.
<https://www.parliament.act.gov.au>

Australian Capital Territory. *Human Rights Act 2004 (ACT)*.
<https://www.legislation.act.gov.au/a/2004-5>

United Nations (2006). *Convention on the Rights of Persons with Disabilities*.
<https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html>