



disabilityreform@dss.gov.au

Re: National Disability Strategy Stage 2 Consultation

The Inner West Disability Forum (IWDF) is a network comprising members who work in the disability sector in the Inner West suburbs of Sydney. The IWDF Committee have put together this response to the National Disability Strategy Stage 2 Consultation following a survey and consultation of members of the IWDF network. Twenty-Five members of the IWDF responded to the online survey - 29% of whom have lived experience of disability and 54% who work in the sector. Twenty members of the IWDF engaged in an online consultation to discuss the IWDF response to the National Disability Strategy Review Stage 2 Consultation.

The IWDF provides an opportunity to collectively identify gaps and barriers within the region and to work together to improve the services delivered to people with disability. Information and resource sharing as well as networking are key components of the network. The IWDF has members in the most part who deliver services within the Burwood, Canada Bay, Inner West and Strathfield local government areas. It has members from disability peak bodies, government funded organisations and NDIS services.

The current IWDF Committee includes:

- Jessica Buhne, National Disability Coordination Officer Program
- Mark Burfield, Settlement Services International
- Myra Hechanova, Burwood Council
- Julia Phillips, Inner West Council
- Matthew Vierboom, Participate Australia
- Melanie Werner, Mable.

The IWDF Committee is pleased to submit to the 2020 review of the National Disability Strategy. The IWDF Committee also recognises and supports the submission made by the Inner West Council.

General Comments on the NDS outcome areas:

The National Disability Strategy was developed after extensive consultations with people with disability, their families, carers, representative organisations, community groups, service providers and all levels of government. These consultations informed the six outcome areas in the Strategy. In consulting with IWDF network members, it was identified that the National Disability Strategy could have a higher focus and emphasis on; raising aspirations of and for people with disability, raising public awareness of diversity and disability inclusion in mainstream services, and building the resilience of people with disability. These areas were considered not well articulated within the NDS 6 outcome areas. Forum members felt that raising aspirations and building resilience could fall within the outcome area of Health and Wellbeing.

Public awareness of disability inclusion in the mainstream is still a major concern for the disability community, and a cohesive approach between all levels of government is needed. Within the IWDF survey disability exclusion was substantiated and identified as negating basic Human Rights, which is further exacerbated by a lack of tools and resources that speak down to the front-line service delivery. There are substantial systemic problems in relation to the violence, abuse and neglect of people with disability and the National Disability Strategy must have a strong focus to address these violations. IWDF members felt that preventing abuse must have a strong focus within the strategy:

“Preventing abuse needs to be given a strong place.”

The IWDF Committee recommends that:

- The National Disability Strategy has a higher focus and emphasis on; raising aspirations of and for people with disability, raising public awareness of diversity and disability inclusion in mainstream services, and building the resilience of people with disability.
- The National Disability Strategy has a strong focus on addressing human rights violations of people with disability.

Economic Security:

People aged between 15 and 64 years with disability have both lower participation (53%) and higher unemployment rates (9.4%) than people without disability (83% and 4.9% respectively)¹. In order to advance economic security for people with disability, the National Disability Strategy must level the playing field by breaking down barriers to employment and challenge the misconceptions that have been used to justify inequity. Affirming employment is important and does not happen to the greatest extent.

It is the responsibility of both the government and non-government sectors to employ people with disability. Initiatives across all levels of Government and all industries to improve the employment outcomes of people with disability should be a priority. Purposeful employment of people with disability is fundamental to individual self-worth and independence whilst also reducing welfare dependency.

The IWDF Committee recommends that:

- The National Disability Strategy ensures a strong focus on the role that both the Government and non-government sectors have in improving employment outcomes for people with disability.

General Comments on the NDS Guiding Principles:

Involve and Engage

Engagement of people with disability is essential in ensuring an effective national strategy. It is through a good consultative process that the likelihood of making good, evidence-based decisions is achieved. A national strategy must be informed by the needs and wants of people with disability in order for it to have any real impact. This includes consultation with people with disability in every stage of planning; from development through to implementation, and review.

The following concerns however were raised by IWDF members:

“I think its important to ensure that consultation takes place early enough and that there is an accountability to those who are consulted and to the wider community for how well the consultation is carried out. It shouldn't be a box-ticking exercise”

“not everyone with a disability is able to engage in such actions. Often their particular disability does not allow them to participate. The question is how do you maximise participation”

“One of the biggest hurdles is that culturally there is a belief for people of CALD backgrounds, is to stay at home and be cared for by family, rather than having a voice and being active in their community”

¹ <https://www.and.org.au/pages/disability-statistics.html> accessed 27 October 2020

To ensure that the implementation process of the National Disability Strategy is responsive to the needs of people with disability, deeper consultation with diverse communities is imperative in this process. This includes culturally responsive engagement with culturally diverse communities and Aboriginal and Torres Strait Islander communities. Collaboration and co-design with people with disability is essential.

The IWDF Committee recommends that:

- Consultation with people with disability occurs at every stage of planning; from development through to implementation, and review.
- Deeper and culturally sensitive consultation with culturally diverse and Aboriginal and Torres Strait Islander Communities occurs at every stage of planning; from development through to implementation, and review.

Engage the broader community

A key component of the 2010 – 2020 National Disability Strategy was for “the broader community and mainstream services and facilities that are part of ordinary Australian life to be available and fully accessible for people with disability”. Engaging the broader community is key to achieving this objective. It is noted through the IWDF survey that there are challenges when it comes to engaging the broader community, and it is arguable that this is due to a lack of disability awareness across mainstream environments.

“there are many barriers in the broader community that need to be addressed. Accessibility is an ongoing issue”

“Not always happening. More groups and people from the community should be involved”

“Collective Action is a must. NGOs, community residents, schools and families should all have a seat at the table”

Focus should be given to ensure that there is a responsibility and accountability for the broader community and mainstream services to facilitate the inclusion of people with disability. Changing attitudes and building disability awareness takes sustained work over time, and engaging the broader community is a positive step towards this.

The IWDF Committee recommends that:

- Engagement of the broader community must include an objective to build disability awareness of mainstream services.

Design Universally

The National Disability Strategy has been the key mechanism for driving a more inclusive approach to the design of policies, programs and infrastructure so people with disability can participate in all areas of Australian life. It guides the design, implementation and delivery of mainstream policy, services and infrastructure as well as specialist disability services² and is the main mechanism under which UNCRPD principles are incorporated into policies and programs in Australia.

Universal Design at its core enables all people to access, understand and use, to the greatest possible extent the environment around them. This includes both the built and digital environments, which should be designed to meet the needs of all people. It should be a fundamental condition of

² Review of implementation of the National Disability Strategy 2010-2020, Final report, University of NSW prepared for the Commonwealth Department of Social Services, August 2018, p7.

good design, whereby if an environment is accessible and usable, everyone benefits. By considering the diverse needs and abilities of all throughout the design process, universal design creates products, services and environments that can be used by all.

It is not only good practice, but more cost effective to design universally from the beginning, rather than retrofitting. As an example, in January 2019 the Queensland Government set aside \$335 million to redesign trains after an inquiry found the new trains, built under a \$4.4 billion contract, did not meet disability access standards. <https://bit.ly/34xZQbC>.

“Great idea but how do you encourage builders to put this into practice? Will it help if government offers incentives to have universal design in place? Grant funding or tax discounts etc.?”

Specific to the Inner West area, Burwood, Canada Bay, Inner West and Strathfield areas are older areas and accessibility is often very difficult for people with mobility needs. Additional consideration needs to be put into blending accessibility whilst also preserving the heritage of the area.

The creation and implementation of universally designed environments, both physical and digital, requires adherence to many discrete pieces of legislation and policy. Each of these instruments set different expectations and attract different consequences, making it difficult to drive a nationally consistent approach that enables people with disability to participate as equal and valued citizens. The development of specific principles embedded within the next National Disability Strategy must seek to ensure adequate funding, policy, and legislative environments to enable all people with disability to access and participate fully in education, employment and community.

The IWDF Committee recommends that:

- The National Disability Strategy to embed Universal Design Principles.

Targeted Actions Plans

Targeted Action Plans are proposed to better facilitate improved outcomes for all people with disability over the life of the new Strategy, with the aim to assist everyone in understanding exactly what they must do and help shape future policy and program decisions. The process of developing targeted action plans however is most often dependant on resourcing.

The IWDF Committee are supportive of targeted action plans, and with particular emphasis on the adoption of principles of Universal Design. Because a strategy is nothing without action, improving resourcing, recruitment and training of 'grass roots' supports is a key component in ensuring the strategy is effective. This includes employment strategies and improved pathways and support for people with disabilities in mainstream employment.

A Targeted Action Plan is essential however must include targeted, measured and attainable goals. A strategy without an action plan will not work by itself. Consideration is needed to ensure that the strategy, once in place, has regular and ongoing review, and with better reporting procedures. Targeted Actions Plans should have the same weight bearing as Workplace Health and Safety Plans and Environmental Plans.

“Concrete and specific targets and clear accessible reporting on them at very regular intervals. Incentives and penalties for inaccessibility.”

“A strategy without an action plan will not work by itself. Who will develop this and monitor it are critical parts to make this work.”

“Most plans are very good. The shortfall lays were there is a lack of implementation.”

“Because a strategy is nothing without action. The biggest failure of strategies like this is that they are not put into action.”

“A target action plan is essential - with targeted, measured, attainable goals”

Reviewing the National Disability Strategy should be annual, reviewed both regionally and in urban centres by a panel of diverse lived experience community members. Concrete and specific targets and clear accessible reporting on them at very regular intervals. There need to be incentives and penalties for inaccessibility. Consultation need not be expensive and it is evident that a benefit of the COVID-19 environment is the improved use of technology to be more inclusive.

The IWDF Committee recommends that:

- Elevate the process of Targeted Action Plans to the top of organisations so that the responsibility lies where the resourcing is decided.
- Annual Review the National Disability Strategy, reviewed both regionally and in urban centres by a panel of diverse lived experience community members.
- Implement incentives and penalties for inaccessibility.

Government and non-Government responsibilities

Responses to the IWDF survey suggests gaps in comprehension of the National Disability Strategy, the disconnect between government departments, and the realities of the front-line service delivery and day to day barriers of those with lived experience and the organisations servicing them. The National Disability Strategy emphasises the role that non-government sector plays in enhancing outcomes for people living with disability. At the national level there should be a counterpart to the state and local government levels to include and consult more with the non-Government sector.

“...I think community and organisations work well but at times I feel the government makes policy but doesn't necessarily follow through with funding in the right places to ensure people with disability reap the benefits...”

“...The government needs to be on the ground seeing and experiencing what is happening....”

“...I believe Councils make the best of a bad situation, though at a federal level there is a lot lacking and I question many aspects of the implementation of the NDIS people of lived experience is essential...”

“At the moment, there is a great deal of buck-passing that occurs. This is a very serious issue, and it means nobody gets what they need as the cracks are very large. For example, an accessible train station may be a state problem, and a council problem. When issues are raised at the council level, it is passed off as a state problem, and vice versa.”

“roles and responsibilities would be good - gives us a road map to know where to go and who to ask for support and guidance”

“committee of key players from a wide area of disability and mainstream sectors. We want inclusion so we need mainstream orgs to be involved and be capacity built as an example and then a mentor for all.”

The IWDF Committee agrees that all levels of government and all sectors of the community share the responsibility to work together to remove barriers and shape attitudes so that people with disability can fully participate as equal members of the community. A focus on facilitating and fostering ongoing attitudinal change to harness the rich contribution that people with disability make to society is foundational to the success of a fully inclusive and equitable Australian Society.

The IWDF Committee recommends that:

- Consultation must occur between all levels of Government and the non-Government sector
- The National Disability Strategy to consider how to facilitate and foster ongoing attitudinal change.