

National Disability Strategy Governance  
and Engagement Section  
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Via email: [disabilityreform@dss.gov.au](mailto:disabilityreform@dss.gov.au)

Dear Engagement team,

### **Inputs – New National Disability Strategy**

Thank you for this opportunity to make inputs to the consultations around a new National Disability Strategy.

In making this response, we refer you to our comprehensive [submission](#) from April 2017 to the Senate Standing Committee on Community Affairs *Inquiry into the delivery of outcomes under the National Disability Strategy 2010-2020 to build inclusive and accessible communities*.

Many of the issues identified in that submission remain relevant and should be addressed in developing a new Strategy.

ACTCOSS's response to the National Disability Strategy Position Paper (the Position Paper) also draws on a consultation held on 22 October 2020 during regular meetings of ACT disability and carer policy representative organisations in conjunction with the ACT Office for Disability.

### **Overall comments**

- The Position Paper does not signal any new practical policy, regulatory and investment measures to create change from Australian Government, states and territories or local government.
- The next version of the Strategy must contain concrete measures under each of the six themes. This should include action by the Australian Government and state and territory governments to model good practice in areas like public sector employment, Universal Housing Design and strengthening the enforcement powers of the *Disability Discrimination Act 1992* (Cth).
- There is a disproportionate emphasis in the Position Paper on attitudinal change to achieve outcomes. Evidence

suggests that attitudinal change alone is insufficient. It must be accompanied by more tangible changes including changes to legal, regulatory, physical and digital infrastructure.

- The Position Paper does not mention people with dual or multiple disadvantage. It does not mention Aboriginal and/or Torres Strait Islander people specifically or discuss links to Closing the Gap. The Position Paper also does not discuss links to any other Australian Government action plans or strategies.
- The Position Paper misses the opportunity to articulate the role of local and municipal government. This is a significant omission given that themes require local government action and investment to deliver strategy outcomes.
- The Position Paper introduces confusion around the core remit of the National Disability Strategy (NDS). It suggests the National Disability Insurance Scheme (NDIS) is responsible and accountable for implementation of elements of the Strategy.
- This is highly problematic and contrary to the hitherto understood governance architecture for disability reform. The NDIS is primarily focused on one NDS stream. It is unclear how and why the NDIS would be used to reform mainstream systems. Cross-over into mainstream provision is intentionally prohibited by the NDIS Act.
- The position paper seems to be overly focused on service reform rather than focused on physical and digital infrastructure, housing, incomes, employment, education attainment, rates of incarceration and systemic outcomes.

### **Specific comments**

#### **Guiding principles**

The Guiding Principles overly emphasises the initiation and design phases with not enough focus on action, review and accountability.

Further, there is little in the Position Paper on what empirical evidence is driving decisions or principles.

The Guiding Principles still appear to be top down. Involving and engaging is not the same as co-design or participation. The role of Disabled Peoples Organisations across the Strategy is unclear.

#### **Increased focus on community attitudes**

The Strategy position paper indicates there is a 'proposal for the new Strategy to have a stronger emphasis on improving community attitudes across all outcome areas'.<sup>1</sup>

We question the level of emphasis placed on 'attitudes' alone. The point of changing attitudes is to ensure that tangible changes are made to the legal,

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<sup>1</sup> Australian Government, *National Disability Strategy Position Paper*, July 2020, p.7.

regulatory, physical and digital structures that cause disadvantage. Evidence shows that the failure to incorporate human rights principles into decision making combined with poor incomes and other structural barriers to goods and services are the main drivers of disadvantage and exclusion.

The NDIS reforms and the Disability Royal Commission mean that people are arguably more 'aware' of disability than at any time in the past 50 years. The problem is that this has not translated into structural change, altered behaviours and changed investment decisions.

There is also a lack of evidence about the effectiveness of attitudinal change work. Further, the Position Paper does not explain how outcomes resulting from attitudinal change will be measured and tracked.

### Strengthening accountability

The Position Paper discusses strengthened areas of accountability.

It is unclear why the Position Paper is focused on not-for-profits and disability-specific services when the National Disability Strategy is about *mainstream change*.

The position paper says very little about some key mainstream areas which present barriers for people with disabilities – for instance, how the NDS will improve physical and digital infrastructure.

### Clarifying roles and responsibilities

Page 8 of the Position Paper calls for an improved Strategy to 'clarify the roles and responsibilities of various levels of government in disability policy and service delivery'. ACTCOSS agrees this is important. However, the task must go beyond clarifying roles and responsibilities. We need to be told how activities, roles and responsibilities at the various levels of government are, for example, to be monitored, prompted, regulated and incentivised.

### Roles of the non-government sector

ACTCOSS agrees the non-government sector has a role in achieving the NDS themes. However, it must also examine the challenges faced by the not-for-profit sector in improving outcomes for people with disability, for example, chronic underfunding and poor commissioning and procurement processes.

### Reporting

We agree that reporting and accountability need to be strengthened and support outcomes-based reporting. This should be specific, measurable and use external, trusted and verifiable data sources.

### Collecting data

ACTCOSS believes the NDS progress needs to be assessed against agreed publicly available markers of progress and wellbeing for people with disability. This should be available in an open source format and include indicators like:

- Numbers of people in inclusive education

- Health outcomes (general wellbeing – available mortality)
- Percentage of houses built to Universal Housing Design standards
- Take up of access standards in planning processes and buildings
- Declines in incarceration, child removals and justice system contacts.

Indicators being assembled for the ACT Wellbeing Framework could be a useful model for this kind of reporting.

As we noted in our 2017 submission, deliberative processes could be useful in a qualitative evaluation. For instance, a citizens' panel involving people with disability as expert witnesses could be a good way of aggregating, synthesising and developing a scorecard on progress towards outcomes under the Strategy themes.

#### Evaluating policy and programs

The commitment to undertake policy and program evaluations sounds positive.

#### Putting policy into action

ACTCOSS offers cautious support for the move away from implementation plans to targeted action plans and engagement plans.

However, we suggest it needs to be made clear that these plans are not the same as internal government Disability Action and Improvement Plans which are primarily focused on internal culture.

#### Promoting and communicating the Strategy

We are unclear why the communication of the Strategy itself is being flagged as a priority that needs focus. The primary focus should be on the substance and impact as a cross-government agreement rather than investing time in rebadging or renaming the Strategy.

I thank you for the opportunity to comment on the new NDS.

Yours sincerely



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