

Submission to the National Disability Strategy Consultation from Women with Disabilities Victoria

October 2020

About Women with Disabilities Victoria

Women with Disabilities Victoria is an organisation run by women with disabilities for women with disabilities. Our members, board and staff live across the state and have a range of disabilities, backgrounds, lifestyles and ages. Our mission is to improve women's choices by being a voice for women with disabilities, building partnerships and educating service sectors and the community.

WDV is a membership-based organisation. This submission draws on findings and recommendations from our research, evaluation of our programs and earlier consultations with women with disabilities.

WDV undertakes research, consultation and systemic advocacy. We also provide professional education, representation, information, and leadership programs for women with disabilities. Our gender perspective allows us to focus on areas of particular inequity to women with disabilities including access to women's health services and safety from gender-based violence. In this time of rapid change to disability services, we are also working to ensure that the NDIS is responsive to women with disabilities.

Why tailored responses to women with disabilities is important

The independent review of the first National Disability Strategy conducted by the Social Policy Research Centre in 2019 identified a number of intersectional groups which needed further attention in the new National Disability Strategy, including women. The review recommended that these groups should be involved in the design, rollout and monitoring of the new Strategy, and equipped with the funding and capacity to do so.

The multiple disadvantages faced by women with disabilities have been entrenched for a long time. Nearly one in every five Australian women has a disability. Around one in two Australian First Nations women have a disability. We encounter disability discrimination which compounds with gender discrimination. This impacts our lives on many levels, each of which restricts our opportunities for equal participation in economic, social, educational and political life. Some women with disabilities experience additional multiple layers of discrimination based on race, age, rurality and sexual orientation, among other things.

On all measures of social and economic participation (housing security, income, employment and education), women with disabilities are disadvantaged compared not only to people without disabilities but also to men with disabilities. Key issues include:

- Under representation in policy and programs
- Under representation in employment
- Under representation in NDIS participation
- Lack of pay equity
- Lack of parenting supports
- Lack of access to sexual and reproductive health services
- Over representation in experiences of violence in all the settings that we live, work, learn, play and receive services.

These issues have been well documented, including in the following sources:

- [Disability Rights Now 2019](#): Australian Civil Society Shadow Report to the United Nations Committee on the Rights of Persons with Disabilities: UN CRPD Review 2019
- [WDV's past submissions](#)
- [WWDA's past submissions](#)
- [Prevalence of violence and abuse of people with disability in Australia](#), Centre of Research Excellence in Disability and Health, 2020
- [Change the Story: A shared framework for the primary prevention of violence against women and their children in Australia](#), Our Watch, Vic Health and ANROWS, 2015
- [What does the NDIS mean for women and girls? Considering the implications of our market-based system for gender equality](#), Power to Persuade, 2020
- ["Let's do it right first time"](#): Response to the Consultation Regulatory Impact Statement - Proposal to include minimum accessibility standards for all housing in the National Construction Code, Australian Network for Universal Housing Design, 2020.

The above sources draw on evidence around what is required to address these serious inequities. Combining that evidence with experience of promising practice in Victoria, we wish to offer the following recommendations for the Australian Government to consider in shaping the future for Australians with disabilities.

1. Add a gender-lens to all actions and measures of the National Disability Strategy.

As we have outlined above, there is an existing evidence base about the inequalities faced by women with disabilities. In Disability Rights Now 2019, the Australian Shadow Report to the UN Treaty Committee for the Convention on the Rights of Persons with Disabilities, the disability community recommends that government should “address the methodological restrictions in data collection instruments used to capture data on violence against women.” WDV fully supports this as a matter of priority and urgency.

However, there is a broader data deficit about the impact of the National Disability Strategy overall on women with disabilities, outside the rates at which women with disabilities access disability supports. This extends beyond the monitoring of the Strategy itself to overall government monitoring of other initiatives which impact on women with disabilities; without understanding how women with disabilities are impacted by COAG housing strategies, for example, it is difficult to recommend the actions that the new strategy should take in this area. Likewise, State and Territory initiatives need to have disaggregated data collection about the gendered impacts of their policies and programs on women with disabilities, in a way that allows for consistent comparison across jurisdictions.

The prioritisation of data collection, monitoring and reporting across government initiatives related to the lives of people with disability should be a key early action from the new Strategy. At the heart of this work should be the involvement of intersectional communities, including women with disabilities. Disabled women’s organisations at national, state and territory levels should be resourced to have input into this work, and should be asked about its effectiveness before, during and after implementation of any data initiatives.

In Victoria, major reform is underway to prevent and respond to family violence, including violence against women with disabilities. In this area - and others - it is important to capture emerging evidence as practice progresses.

2. Resource the involvement of women with disabilities in decision making bodies that impact our lives, fostering opportunities for us to shape systems and programs our fulfil our leadership potentials.

Women in general - and women with disabilities in particular - are often under-represented in leadership of all kinds. Societal gender bias means that women are afforded fewer opportunities because they have lower

educational outcomes, higher caring responsibilities and higher rates of experiencing violence than men, and leadership development structures and leadership roles do not take account of the need for flexible, trauma informed development.

Targeted, well resourced and gender specific initiatives supporting women with disabilities to have voice should be a priority for the life of the next Strategy at national and State/Territory levels. State and Territory Disability Plans should articulate the ways in which women with disability are given resources and opportunities to have voice, along with the National Disability Strategy itself. This should include the sustainable development of disabled women's organisations across the country at all levels so that progress can be made through ongoing systemic advocacy from lived experience. At present, there are vastly different funding arrangements for disabled women's organisations in different jurisdictions; this needs to be rectified as a matter of priority.

3. Measure and increase employment of women with disabilities in the Australian Public Service, non government organisations and the private sector.

Rates of employment for women with disability are lower than for men with disabilities. Work is needed from government, non-government and private sector actors to plan and implement measures to create change, and monitor their success.

4. Resource and coordinate links and between the National Disability Strategy and the National Plan to reduce violence against women and children.

The National Plan to Reduce Violence against Women and their Children has a number of strategies aimed at improving support for women with disabilities; however, these strategies and their outcomes need to be cross-referenced with the new National Disability Strategy to make sure that the specific needs of women with disabilities and their children are met.

For example, the Plan states under Outcome 4 that services should be able to meet the needs of women and children experiencing family violence, and Strategy 4.3 aims to support mainstream services to identify and respond to needs. Women with disabilities access a very particular subset of mainstream services through the National Disability Insurance Scheme (NDIS) and disability service providers. Both the Strategy and the Plan should clearly measure gaps and identify actions to make sure that disability specific services have the same capacity to identify and respond to family violence experienced by women with disabilities.

Notably, the Plan currently runs until 2022. The Strategy should incorporate ways for government and disabled women's organisations to plot out the future connections between the Strategy and future work on prevention and response to violence against women as Plan cycles shift.

Best Practice Example

Our Watch and WDV are working in partnership to develop a conceptual model, practice principles and a practice handbook to prevent violence against women and girls with disabilities. This partnership includes guidance from women with disabilities working at state and national levels.

5. Increase action to address disability abuse, incorporating gender transformative practice and evidence regarding prevention and response to violence against women with disabilities.

While the National Plan, and the actions which stem from it, are crucial to making progress in preventing and responding to violence against women and girls, very disability specific forms of violence are currently being exposed and examined through the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disabilities. The National Disability Strategy should plan to integrate recommendations arising from the Royal Commission, as accepted by government, and to resource those recommendations accordingly.

During the time that the Royal Commission is underway, it is imperative that disability advocacy organisations are resourced to continue supporting people with disability to engage with the Royal Commission.

6. Create a system interface between the NDIS and state and territory Domestic / Family Violence systems.

Often women who experience family violence have to leave informal carers to become safe. Women with disabilities may not be allowed to access disability supports as a form of control, so that a perpetrator is more relied upon or is not detected. Providing tailored, timely and well coordinated disability supports to victim survivors is critical. At present, the interfaces between the National Disability Insurance Scheme and the state and territory family violence systems are not always clear or well coordinated, meaning women with disabilities have to wait for access to the Scheme or receive additional support in their plans.

Best Practice Example

The Safe Steps Disability Family Violence Crisis Response provides brokerage for women and children impacted by family violence crisis for what can be expensive disability goods and services. Victoria's disability budget transition into the NDIS places this state fund in jeopardy. Equivalent emergency funding is not available through the NDIS or regular family violence brokerage.

7. Include minimum accessibility standards for all housing in the National Construction Code, and understand this as a prevention and a response to violence against women with disabilities.

Accessible housing is scarce in Australia creating a range of inequities for people with disabilities. For women and children with disabilities the lack of accessible housing can be another factor stopping them from finding safety from family violence. The housing problem can also create housing stress that in fact creates the conditions to foster family violence. Disability community calls for accessible housing standards have been sustained for decades due to their ongoing high importance in our lives. As the Commonwealth are currently encouraging new housing developments, now is the time to act.