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National Disability Strategy Governance and Engagement Section
Department of Social Services (DSS)
By email to: disabilityreform@dss.gov.au

Dear Sir/Madam,

I CAN Network welcomes the opportunity to contribute to the Stage 2 Consultations of the new National Disability Strategy (NDS). I CAN Network is Australia's largest Autistic-led organisation that aims to drive a rethink of Autism from 'I Can't' to 'I CAN'. We run Autistic-led face-to-face and online mentoring programs at scale to increase the self-acceptance, self-confidence and social connections of Autistic young people and young adults (aged 9-20 years) across Australia. We also organise events and campaigns and write policy submissions to promote a strengths-based view of Autism to the public.

I CAN Network welcomes some of the ideas put forward by DSS in relation to the new NDS. We agree with the retention of the vision and outcome areas from the previous NDS for the new NDS and the commitment to develop an outcomes framework for the new NDS which will negate the need for TAPs. Herein we also put forward recommendations which, if implemented, should strengthen the importance and implementation of the new NDS for the next 10 years. These include a dedicated chapter explaining how stakeholders can change public attitudes towards people with disability and stressing the importance of non-government organisations (NGOs) and Disabled People's Organisations (DPOs) in contributing to the outcomes of people with disability.

I CAN Network is happy to be contacted further to provide further information on our submission. Should you like to discuss the submission further, please contact us in the contact details below.

Yours sincerely

A handwritten signature in black ink that reads "James".

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Summary of Recommendations

1. Retain the vision of the National Disability Strategy (NDS), including the change in term from ‘citizen’ to ‘members of the community’.
2. Include a chapter which is dedicated to explaining how stakeholders can influence community attitudes towards people with disability, including Autistic people.
3. Retain the six outcome areas of the NDS with the condition that they be not overshadowed by other initiatives such as the National Disability Insurance Scheme (NDIS).
4. Fully inform and involve Non-Government Organisations (NGOs) in the development of the new NDS.
5. Describe the important role which Disabled People’s Organisations (DPOs) can play in achieving the vision and outcomes of the NDS.
6. Delay the publication of the NDS Outcomes Framework until it has gone through extensive consultation, particularly people with disability, and can be applied to designing and evaluating different programs and initiatives.
7. Replace the Targeted Action Plans (TAPs) in an attempt to deliver outcomes of the NDS.

Emphasising change to community attitudes in fulfilling the vision of the NDS

Recommendation 1

Retain the vision of the National Disability Strategy (NDS), including the change in term from ‘citizen’ to ‘members of the community’.

I CAN Network agrees with retaining the vision of the NDS which aims to build:

An inclusive Australian society that enables people with disability to fulfil their potential as equal members of the community.

The vision provides the end-goal for all stakeholders to improve the outcomes of people with disability, particularly Autistic people. Given that Autistic people still have more difficulties in school and have worse employment outcomes compared to people with other disabilities, a lot of work still needs to be done to ensure that Autistic people are included in Australian society. The vision provides the end-goal that all initiatives for people with disability can strive towards.

Within the vision, the change of the term ‘citizen’ to ‘members of the community’ emphasises the need for all stakeholders to not just provide relevant supports for people with disability but also help them make valuable contributions to their communities. As an Autistic-led organisation, we witness everyday how Autistic people can harness their strengths and capabilities to contribute to the world. Having the opportunity to showcase their abilities can constructively build their self-worth and connection to the community. In turn, these will have a positive effect on their mental well-being. Providing meaningful and respectful supports also enables more people with disability to grow their skillset so that they can contribute more to the economy.

Recommendation 2

Include a chapter which is dedicated to explaining how stakeholders can influence community attitudes towards people with disability, including Autistic people.

In order for people with disability to meaningfully contribute to the community, there needs to be a stronger emphasis in the NDS on how community attitudes can be changed to increase the acceptance and inclusion of people with disability. Currently, the lack of understanding and empathy towards people with disability

continues to present a major barrier for their acceptance and inclusion in the community and the workforce. Problems arising from this include school suspension and exclusion policies which overwhelmingly impact students with disability, particularly Autistic students, and the lack of meaningful accommodations in education and the workplace. Hence, I CAN Network believes that the new NDS should include a chapter dedicated to explaining how stakeholders can influence community attitudes towards people with disability to improve the narrative around disability.

For example, in the Autism space, the media often promotes extreme depictions of Autistic people which either reinforce unhelpful stereotypes (“All Autistics are gifted”) or, conversely, portray Autistics as a “burden on society”. These depictions either overlook the daily challenges Autistic people and their networks go through every day or the strengths and capabilities Autistic people can utilise to contribute to society. Such mindsets can greatly hinder genuine understanding, acceptance and inclusion of Autistic people in the community. These are aggravated by the lack of nuancing and authenticity from the lived experience and diverse voices of Autistic people that are too often not represented.

We endorse the use of multiple, complementary communication channels to rebalance the portrayal of Autistic people to show both their strengths and challenges. This rethink of Autism would involve not only mass media campaigns such as Amaze’s *Change Your Reactions* TV campaign but also targeted social media campaigns such as I CAN Network’s *Humans on the Autism Spectrum* campaign, both of which are centred around Autistic lived experience. Although both campaigns aim to change community members’ views and attitudes towards Autistic people, they target different parts of the community with the former engaging adults and the elderly and the latter reaching out to young people and young adults.

It is vital that Autistic voices from a diverse range of backgrounds and experiences are included in the rethink of Autism, particularly those from marginalised groups such as those with high support requirements and LGBTQIA+ backgrounds. These two representative campaigns illustrate how the NDS might guide stakeholders in engaging mass and social media to raise awareness of people with disability. These modes of communication will engage the public to be more accepting and inclusive of people with disability in the community and the workforce.

Safeguarding the outcome areas of the NDS from the NDIS

Recommendation 3

Retain the six outcome areas of the NDS with the condition that they be not overshadowed by other initiatives such as the National Disability Insurance Scheme (NDIS).

I CAN Network agrees with retaining the six outcome areas of the previous NDS (2010-2020). These six outcome areas are essential for improving the quality of life of people with disability to a level that is equal to those without disability. In particular, I CAN Network agrees with retaining the two outcome areas of *learning and skills* and *economic security*. These two outcome areas are essential for improving the outcomes and lives of Autistic people, many of whom are disadvantaged as they do not currently have equitable access to education and employment. This has resulted in lower rates of post-school qualifications and employment that exceeds those of people with other disabilities.

At the same time, it should be emphasised that the outcome areas must not be completely overshadowed by other initiatives such as the NDIS. In particular, the *economic security* outcome area of the NDS overlaps with the aims of the NDIS to ...*support the independence and social and economic participation of people with disability...* (s3(1)(c) of NDIS Act 2013). The rollout of the NDIS, whilst enormously beneficial for many people with disability, seems to have taken the focus away from the NDS. For a range of reasons, not every person with a disability in Australia can access the NDIS, including Autistic people who face difficulties in life.

In particular, the NDIS does not reach out to Autistic people who find the NDIS application process overwhelming or whose Autism is not “significant” enough to impact their ability to complete everyday tasks.

In order to build and safeguard the economic security of Autistic people, it is critical that other valuable initiatives are promoted alongside NDIS. Diverse ideas which could be explored to achieve economic security include encouraging innovation and entrepreneurship among people with disability, particularly Autistic people, and building post-school pathways that cater to the strengths of people with disability.

Increasing NGO awareness of NDS

Recommendation 4

Fully inform and involve Non-Government Organisations (NGOs) in the development of the new NDS.

Recommendation 5

Describe the important role that Disabled People’s Organisations (DPOs) can play in achieving the vision and outcomes of the NDS.

We see a missed opportunity when NGOs, particularly DPOs, are not actively involved in the shaping, implementation and evaluation of Australia’s NDS. The most effective way to encourage buy-in among NGOs and maximise their impact in the disability space is to ensure that they are fully looped into the policy development process, including the new NDS. This submission elevates the role of NGOs in representing and improving the quality of life of people with disability so that they can be equal, independent members of the community. In particular, we emphasise the importance of DPOs that support and improve the outcomes of people with disability.

DPOs are particularly well positioned to capture and harness the lived experiences, voices and insights of people with disability which have been overlooked or marginalised in the past. These are things that can be difficult to obtain from a government perspective, presenting an incentive for governments and DPOs to form partnerships where both sides mutually benefit. Under this partnership, DPOs can offer the lived experiences of people with disability to governments so that they can cater their services to people with disability and drive a cultural and attitudinal shift within government departments.

For example, I CAN Network has partnered with the Victorian Government for a number of years to influence Autism policy in Victoria. The Victorian Government is able to use the lived voices and experiences of Autistic people offered by I CAN Network to inform their policies on Autism in Victoria. In particular, we have been influential in developing the proposed Autism education strategy in Victoria which will improve the experience of Autistic students in government schools. Our role in developing this proposed strategy has contributed to the rapid growth of the organisation which is something that would be more difficult to achieve without a government partnership.

The example above shows the important role DPOs can play in influencing disability strategy, policy and initiatives to improve the outcomes of people with disability. It is important that the role of DPOs be represented in the NDS so that governments can consult and form partnerships with DPOs across Australia. This will enable the lived voices and experiences of people with disability to be valued and properly represented in the development of disability strategy and policy. In return, people with disability can be given some influence to change the course of disability strategy and policy so that they cater to people with disability, enhancing the chances of buy-in to the new NDS from people with disability and DPOs.

The value and costs of building the outcomes framework

Recommendation 6

Delay the publication of the NDS Outcomes Framework until it has gone through extensive consultation with people with disability, and can be applied to designing and evaluating different programs and initiatives.

I CAN Network welcomes the government's plan to include an outcomes framework in the next NDS. As raised by academics in The Centre of Research Excellence in Disability and Health, there are currently no initiatives that collect or track outcome data on people with disability. This has made it difficult to keep stakeholders accountable in working towards the vision and desired outcomes of the NDS. The outcomes framework would allow governments and stakeholders to be held accountable in improving the outcomes of people with disability in accordance with the NDS. The outcomes framework would also prompt service providers to relate their programs to the new NDS and build an evidence base showing the effectiveness of their services, initiatives and programs in improving the lives and outcomes of people with disability.

I CAN Network would like to alert the Federal Government, though, that it will take time to develop an outcomes framework which has the support of all stakeholders and can be applied to different projects. It is very important that people with disability and DPOs are extensively consulted to ensure that the outcomes and indicators in the outcomes framework are appropriate for people with disability. Time also needs to be allocated for the Federal Government to select appropriate data sources that can be used to track the outcomes of people with disability across Australia.

As an example, the Victorian Government implemented an outcomes framework in its *Absolutely Everyone: State Disability Plan 2017-2020* to ensure the government is progressing towards the vision of "an inclusive Victoria, which supports people with a disability to live satisfying everyday lives". After the outcomes framework is completed and tested, the Victorian Government aims to use it to track progress in different aspects of the lives of people with disability. In its 2018 Annual Report, however, the Victorian Government admitted that work on the outcomes framework is ongoing with some baseline measurements still needing to be collected and the framework not tested yet in a real-life environment. This example highlights the long process of developing an outcomes framework which caters to the views of people with disability and their networks and which can be applied in a real-life context to track changes in the outcomes of people with disability.

I CAN Network advises that the outcomes framework should not be released in the next NDS until it has gone through extensive consultation with and alongside people with disability. We note that the exact composition of the NDS outcomes framework has not been publicly disclosed yet. This will impede conversations that are necessary for people with disability to have a say in the outcomes framework and delay the implementation of the outcomes framework in government and non-government programs. A draft of the NDS outcomes framework should be circulated in a separate consultation as soon as possible so that the views of people with disability can be collected and considered. The development and testing of the outcomes framework should also be reported annually to the public to ensure that work on the outcomes framework is progressing and that it is in a form which can be implemented in different programs and initiatives. Nevertheless, once the outcomes framework is fully developed, it will become an important centrepiece in the new NDS which will form the basis for reporting on how people with disability are more included in the community.

Replacing the Targeted Action Plans (TAPs)

Recommendation 7

Replace the Targeted Action Plans (TAPs) in an attempt to deliver outcomes of the NDS.

The development, implementation and reporting of the outcomes framework will serve to measure how effective the NDS is in improving the lives and outcomes of people with disability. This negates the need for Targeted Action Plans (TAPs) which only serve to improve some areas at the expense of others. The six Outcome Areas, being interconnected, are very important to simultaneously work on to raise the living standards of people with disability. Focusing on improvements in a few Outcome Areas at the expense of others under the TAPs will not improve the overall lives of people with disability. For example, initiatives which only target improvements in the access and quality of education without increasing access to jobs for Autistic people would not lead to economic security. This is because nothing is being done to cater to the increased number of highly-qualified Autistic people to secure and retain jobs that are commensurate to their qualifications. TAPs also run the risk of disengaging stakeholders, particularly NGOs, that do not focus on the narrow range of deliverables of a specific TAP. For example, I CAN Network would be disengaged if there are no short-term deliverables relating to the education, transition and retention of Autistic people in meaningful, sustainable employment. This disengagement would make it more difficult for NGOs to buy into the vision and aims of the new NDS.

Instead, we propose that a better solution is to implement an all-encompassing outcomes framework with indicators that can be easily measured and reported in annual progress reports. This approach would inform stakeholders that all Six Outcome Areas are important to work on simultaneously to improve the lives of people with disability. The outcomes framework would also allow organisations such as NGOs to pick outcomes and indicators that are relevant to them and implement initiatives that improve specific outcomes of people with disability while still relating to government policy.