



To: Department of Social Services
Email: disabilityreform@dss.gov.au
Date: 4 November 2020

Feedback to the National Disability Strategy Position Paper July 2020

Life Without Barriers (LWB) is a charitable organisation supporting almost 23,000 people in over 400 communities across Australia. We provide people with the services and assistance they need so they can achieve their goals and maximise their opportunities to participate as fully as possible in society as they wish. We partner with communities, elders, government and others to ensure positive long-term change for the people we work with. We support a range of people including: people with disability; children, young people and families; people with mental health needs; refugees; and people who are homeless.

LWB was established close to three decades ago by a determined group of community members with a clear vision – to partner with people to improve lives for the better. Our foundational purpose carries us forward today as one of the largest national providers of social services in Australia. We directly support around 5,000 people with disability through the National Disability Insurance Scheme (NDIS), the majority of whom have intellectual disability and many have high and complex needs.

In responding to the Position Paper, LWB ensured that our clients are aware of this consultation and we supported their direct feedback to the Department of Social Services, particularly through our internal Disability Services Advisory Council.

This response focuses on areas that we already highlight in our existing public policy strategy. In respect of disability issues, these include:

- the need to enhance the operation of the NDIS
- the need for greater community involvement by people with disability, especially in respect of employment opportunities, careers and accommodation options, and
- the need to promote positive community attitudes about people with disability.

Therefore, we have responded to only a select number of the questions in the National Disability Strategy (NDS) Position Paper, as detailed below. We also acknowledge that the operation of the NDIS is not a key issue to consider in detail in the NDS, but at times, it is considerably relevant issue, particularly for the people that LWB supports.

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Need to Promote the National Disability Strategy

LWB understands the importance of the NDS and how it is complementary to the NDIS. The NDS needs to be given more community prominence and it is also suggested that its name be changed to highlight inclusion and the need for community action. *Australia's Disability Inclusion Agenda* or similar is suggested.

Q1. Six Outcome Areas

LWB supports the retention of the current Outcome Areas as listed in the Position Paper.

Q2. What do you think about the guiding principles proposed here?

LWB supports the guiding principles proposed in the Position Paper. We note that these and the issues listed under *Vision* may require more explanation on what a fully inclusive society would look like - and highlight how effortless meeting the principles would become if all Australians fully embraced the ideas expressed in the NDS.

We believe that the key guiding principle is *Engage the Broader Community*, which is critical as it talks to a broad community audience. The NDS is a key enabler for people with disability to be truly included in everyday life. Engagement that impacts strongly on the broader community is critical in order to have the positive powerful effect the strategy needs to have on all Australians. This will drive the changes necessary to ensure equal opportunity for people with disability.

Australia has a significantly lower employment participation rate for people with disability as compared against other OECD countries, with a participation rate of around 40%. Additionally, the unemployment rate for people with disability is routinely double the rate of the general population.

LWB is deeply committed to assisting people with disability to have equal access to the same life choices as people without a disability, including in employment. We are committed to the right to work as detailed under the *United Nations Convention on the Rights of Persons with a Disability* and are seeking to change attitudes and culture via our own Accessibility, Inclusion and Employment Plan (AIEP) - copy attached.

This is a detailed plan, with 32 specific actions which serves as an example of good practice for any organisation interested in improving participation in employment as we embed accessibility (in its broadest definition, not just accessible buildings or infrastructure) in our day to day business operations. This strategy guides how we operate as an employer of 8,000 staff with an annual turnover of close to \$700 million.

LWB is a member and supports the Australian Network on Disability (AND) (www.and.org.au/) - an organisation that assists other organisations with attitude, cultural and practical resources and strategies to provide employment opportunities for people with disability.

As a leading agency in the community services sector, one of the fastest growing sectors in Australia today, we believe that we have a responsibility to implement and practice

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inclusion and to lead by example. We do this by creating a culture that is welcoming and supportive of employees of all abilities that will not only harness diversity of experience and perspective, but also provide greater insight into the needs of people with disabilities.

With this objective LWB developed its first AIEP in 2016 with the challenge of creating opportunities in our own organisation. We are now implementing our second AIEP. The underlying principle is that we respect and appreciate the differences of our employees and the people we support and that we are enriched by their diversity. We understand the barriers to employment, as outlined by the Human Rights Commission's nine key attributes creating barriers for people with disability in employment, such as lack of job training and discrimination, and we strive to address these.

LWB raises these issues in the context of the NDS for three reasons:

1. To highlight the need for a focus on employment opportunities as fundamental to promote true inclusion.
2. To highlight this issue at this time as Australia is challenged by the need to ensure employment opportunities are available across the community through the COVID-19 pandemic. Given the existing disadvantage for people with disability in relation to jobs and careers, this challenge is magnified for people with disability.
3. To highlight how a clear and targeted strategy (such as Life Without Barriers' AIEP) can assist in this regard.

Further comments about the proposed leadership role for the community services sector in respect of these issues are at Question 5 below.

Q3. Community Attitudes

The proposed focus on increased attention to community attitudes is *strongly* supported. So much of the success for people with disability being able to be fully involved in their communities and treated equally is dependent on the attitudes of the wider community. We want there to be a promotion and celebration of difference and inclusion across Australia.

The NDS could be a unifying coordinating place for a broader societal attitudinal change campaign. Programs like the "Nudge Unit" in the UK or the similar one in NSW, the "Behavioral Insights Unit", have achieved success with positively influencing the behaviour of populations and public thinking.

Technology can now make this easier, faster and cheaper to change or enhance the attitudes of the broader community. If the broad business community were to live up to the goals of the NDS, businesses could easily lead campaigns to support and drive change in the wider community.

The *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability* was established, in part, to look at community attitudes that have led to violence and how Australia is faltering in meeting its obligations in the delivery of the *UN Convention on the Rights of Persons with a Disability*. Australia needs to do more to improve community attitudes in relation to people with disability. The basic right to live free

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from exploitation, violence and abuse is not automatically part of Australian law. The profile of the UN Convention needs to be raised so that its provisions are better reflected in policies and practices across all parts of our social and economic life.

Attitudes are a barrier to inclusion. The strategy needs to address how thoughts, beliefs and feelings that influence behaviour are strong and positive in relation to people with disability. With its history and experience, the disability sector can play a stronger leadership role in challenging and changing attitudes in the whole community. This sector is able to assist this endeavour by being included in the roll out of the NDS.

LWB is a long-term supporter of the Attitude Foundation (www.attitude.org.au) - an organisation shaping a new understanding of disability through the promotion and development of media content that provides realistic portrayals of people with disability. It actively pushes for community attitudes to change through media portrayals, and in particular, challenging three common misconceptions:

1. That people with disability are only objects of inspiration, pity or tragedy.
2. That an individual's diagnosis or impairment is the barrier to their participation in society and instead promote the Social Model of Disability which recognises that everyone is different and that society needs to be modified to ensure all people can participate equally.
3. That all impairments have obvious physical characteristics when in fact; the majority of impairments are invisible e.g. psychosocial or mental health conditions, intellectual or sensory impairments and hearing and vision impairments.

LWB's primary role is to provide services to assist people with everyday needs. This assistance is designed to enable people to access the community and access opportunities in local communities. While crucial, such services alone are not able to provide the complete outcome of engagement in community life. As well as opportunities provided through the NDIS, community understanding and attitudes, and other measures are equally crucially important.

People with psycho-social and cognitive needs are generally underrepresented in public discourse about disability issues and LWB works with others to give a greater focus to this cohort in the public arena. LWB is motivated to be a sector leader to promote a renewed community conversation about the need to provide better and more opportunities for people with intellectual disability to engage in community life. One suggestion is that NDIS plans could be linked to the outcomes of the NDS around inclusion. It may mean that the plan includes funding for goals to better participate in the community.

People with disability, like us all, are unique and have diverse needs. Many people with disability, despite facing a range of discrimination and other issues, advocate strongly on their own behalf. People with intellectual disability, however, generally face additional barriers and find it more difficult to be part of everyday community life. Many people do not fully understand the range of disabilities and the different impacts on people's lives. The NDS could be better positioned to do more to inform the wider community to build a better

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understanding of the range of disabilities, including 'invisible' disabilities, while also demonstrating the enormous value and contribution that people with disability bring to their communities.

Q5. Role of NGOs

For organisations like LWB, the term 'Non-Government Organisation' (NGO) refers to (mostly) not for profit community-based agencies that provide social services. We note that in the Position Paper, this term refers to all non-government entities, that is, it also includes the business sector. For ease of expression, we will refer to these broad sectors as 'community NGOs' and 'business NGOs' below.

It is of concern that the focus on governments as accountable for the NDS only serves to emphasise the already strongly held views that government is responsible for all things to do with disability, and downplays the role of business and society in general. This is reinforced by a strong focus on the NDIS. However, only around 10% of people with disability are eligible for the NDIS. So, just as NDIS service providers have clear accountabilities in respect of their operations, other parts of our society could have clear accountabilities in respect of the NDS.

Regarding the issue of employment opportunities for people with disability, we make comments below:

Community NGOs

- NGOs like LWB have considerable experience and expertise and are able to perform a stronger leadership role in promoting the inclusion of people with disability through offering real employment and career opportunities. This potential is highlighted by the fact that this sector is Australia's fastest growing sector at this time.

Business NGOs

- People with disability should be able to have full and rewarding careers in jobs in the private and business sectors, whatever their interests and skills. To achieve this, all employers need to support opportunities for people with disability to be working alongside people without disabilities. People with disability need to be fully appreciated for their skills and talents. Encouraging larger businesses to have action plans to promote inclusion, such as LWB's 'AIEP' would assist greatly.

People with disability are keen to be active contributing members of their community through work and recreation and the level at which this is made possible by a country is evidence of its maturity as a society. A whole community is responsible to make this happen. Bringing communities on board can be positively influenced and supported by government leadership strategies.

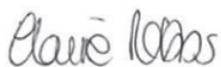
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Summary

LWB puts forward the following issues/recommendations for consideration.

1. That the NDS be given greater community prominence, including a possible new name to reflect its importance and significance.
2. To ensure that the new NDS has a greater prominence relative to the NDIS and that all parts of government, business and the community generally understand the importance and the function of the NDS.
3. That the Community NGO sector be encouraged and supported to provide its voice, insights and resources to assist with the goals of the NDS. Examples of this are LWB's AIEP, Attitude Foundation and the Australian Network on Disability.
4. That economic participation be a major goal of the NDS through the creation of meaningful employment opportunities for people with disability.
5. Through the implementation of the NDS, a model Code be developed that requires larger public and private employers to put in place plans like LWB's AIEP.
6. Extend and promote existing programs that provide financial support for organisations to make reasonable adjustments for employees with a disability.
7. Support a government led approach to influencing society generally and positively in relation to full inclusion of people with disability, such as engaging strategies used by the Behavioral Insights Unit in the UK.

Thank you for the opportunity to submit this response. Attached is a copy of LWB's AIEP for consideration. If you require any further information, we would be pleased to discuss our comments. In the first instance, please contact Mr Chris Chippendale, Executive Lead Disability Engagement at chris.chippendale@lwb.org.au or on 0423 025 035.



Claire Robbs
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