



Submission

National Disability Strategy Position Paper

Australian Government Department of Social Services

People with Disabilities (WA) Inc. (PWdWA) would like to thank the Department of Social Services for the opportunity to provide comment on the development of a new National Disability Strategy 2020-2030 (the Strategy).

PWdWA is the peak disability consumer organisation representing the rights, needs and equity of all Western Australians with disabilities via individual and systemic advocacy.

PWdWA is run BY and FOR people with disabilities and, as such, strives to be the voice for all people with disabilities in Western Australia.

President: Lisa Burnette

Executive Director: Brendan Cullinan

Author: Brianna Lee

People with Disabilities (WA) Inc.

City West Lotteries House, 23/2 Delhi Street West Perth WA 6005

Email: brendan@pwdwa.org

Tel: (08) 9420 7279

Country Callers: 1800 193 331

Website: <http://www.pwdwa.org>

People with disabilities WA (PWdWA)

Since 1981 PWdWA has been the peak disability consumer organisation representing the rights, needs, and equity of all Western Australians with a physical, intellectual, neurological, psychosocial, or sensory disability via individual and systemic advocacy. We provide access to information, and independent individual and systemic advocacy with a focus on those who are most vulnerable.

PWdWA is run by and for people with disabilities and aims to empower the voices of all people with disabilities in Western Australia.

Response to Position Paper

Key Points

- We believe that Co-Design should be a key feature of the new National Disability Strategy both in terms of its development and its implementation
- The Strategy must be appropriately resourced to achieve its goals
- The Strategy must ensure it does not lead to further entrenchment of current gaps, issues, and barriers

Outcomes and Guiding Principles

PWdWA are encouraged to see the Department of Social Services (the Department) looking towards a new Strategy which will focus on community attitudes, taking action and ensuring accountability. The outcome areas are reflective of the trends in issues we deal with both systemically and individually in WA and we are supportive of the updated wording of the Vision for the strategy.

We note that the Strategy proposes guiding principles. It is not clear whether there will be any specific requirement to apply the guiding principles for Government, or as part of Government tendering processes. We would encourage the Department to consider how they can ensure a guiding principle approach is not tokenistic. Our experience has been that guiding principles, without incentive to apply them, end up as just words on paper. Additionally we would recommend that the Department specifically refer to the use of co-design and consider strengthening the 'Involve and engage' principle for the development of policy and design of programs to refer to

being “led’ by people with disability. Co-design is a process that ensures real input from consumers and is the gold standard for engagement.

We also recommend that the Guiding Principles include a principle around choice and control. It is critical that policies and programs developed are reviewed through a lens of choice and control. We have seen many examples recently of decisions, policies and processes being put into place which limit the choice and control of people with disabilities. Examples of this include the decision to introduce Independent Assessments by the NDIA and the lack of action by Government to ensure privacy for people with a disability who may wish to engage with the Disability Royal Commission.

We are encouraged to see the Department recognise that improving community attitudes is a key requirement for the success of the Strategy. We agree that a stronger emphasis is needed on improve community attitudes but there must be adequate resources and investment from government to support these efforts. There also needs to be accountability within government to lead the way in culture change.

Part of this would be ensuring that the Strategy is visible to the community and people with disabilities. We often find that higher level strategies, standards and overarching policies are not well known not only by the disability community, but also the general community.

Accountability

Accountability is critical to driving action for the National Disability Strategy. We know from looking at other standards, such as the Disability Standards for Education, that a lack of measurable outcomes and accountability creates a piece of work that is ineffective at driving change.

While it is important that the roles and responsibilities of government are clear, the Strategy needs to ensure it does not further entrench current gaps and barriers to supports and services. For example, PWdWA’s experience has been that with the roll out of NDIS and the transition of many state funded disability services to the NDIS, a considerable number of people are falling through the gaps. NDIS does not

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individual & systemic advocacy

provide support for all individuals with a disability and many WA state and community funded supports have ceased, leaving individuals without support. There is lots of back and forth between state systems such as health and justice with the NDIA around who is responsible for what. The result of this has been that people with a disability are not receiving the support they need while policy and program decisions are being hashed out. In many cases discretionary decisions are made meaning the systemic barrier remains outstanding for others to encounter.

We recommend the Strategy ensure a 'no wrong door' approach to supports and services. It is critical the Strategy ensure people do not fall into the gaps and become further marginalized. In looking at the roles of various sections of government the Strategy must also ensure that there is cooperation and prevents the siloing of government responsibility where it becomes easier to 'pass the buck'.

In relation to the role of the non-government sector we believe that advocacy and DPO organisations should be viewed as key stakeholders in improving outcomes. We would recommend engagement with the non-government sector to tease out the role each sector has under each of the outcome areas and outline strategies for engaging and supporting these sectors to build and maintain capacity and sustainability to implement the vision of the National Strategy.

We are pleased to see the Strategy make a commitment towards an outcome focus with data collection, targets and reporting. In addition to bringing together already existing data from Commonwealth, States and Territories we would like to see a commitment in the Strategy to creating new points of data collection and funding research to fill gaps in knowledge.

In regard to information made public we would hope to see yearly progress reports towards the 6 outcome areas in the Strategy for Commonwealth, States and Territories in addition to scheduled evaluations and audits for government. Information provided in annual progress reports should include publication of any data collected over the year, actions undertaken, or outcomes achieved and summaries of trends and issues that have been raised throughout the year. We recommend that people with a disability be an integral part of evaluations and audits. PWdWA is generally supportive of the idea of Targeted Action Plans but would like to see more information about how they will be developed and implemented. We

recommend that all Targeted Action Plans be co-designed with people with a disability and have a robust evaluation process to determine the success of the Targeted Action Plan against specific measurable outcomes. We recommend that all evaluations be made publicly available. We also recommend that specific funding and resources be provided as part of Targeted Action Plans to provide advocacy support. This will ensure that advocates have the resources to support people with a disability to have their voices heard as part of any targeted actions undertaken.

The proposed Engagement Plan the Strategy involving people with a disability in the delivery and monitoring of the next strategy must enable meaningful engagement. We strongly recommend that co-design be embedded in developing, delivery and monitoring of the Strategy. There needs to be a commitment to ensuring that roles and functions associated with Strategy are utilising the skills and knowledge of people with lived experience from a variety of disabilities wherever possible whether this be through employing people with disabilities, engaging them on reference groups or using co-design etc. The Engagement Plan must also ensure that resources are available to engage with hard to reach populations meaningfully. This includes rural and remote populations, people in segregated settings, culturally and linguistically diverse, Aboriginal and Torres Strait Islanders and specific disability cohorts.

We look forward to engaging further with the Department as part of consultation on the new National Disability Strategy.