



Purple Orange

JFA Purple Orange
feedback on the
National Disability Strategy
Position Paper

November 2020

About the Submitter

JFA Purple Orange is an independent, social-profit organisation that undertakes systemic policy analysis and advocacy across a range of issues affecting people living with disability and their families.

Our work is characterised by co-design and co-production, and includes hosting a number of user-led initiatives.

Much of our work involves connecting people living with disability to good information and to each other. We also work extensively in multi-stakeholder consultation and collaboration, especially around policy and practice that helps ensure people living with disability are welcomed as valued members of the mainstream community.

Our work is informed by a model called *Citizenhood*.

JFA Purple Orange

104 Greenhill Road

Unley SA 5061 AUSTRALIA

Telephone: + 61 (8) 8373 8333

Fax: + 61 (8) 8373 8373

Email: admin@purpleorange.org.au

Website: www.purpleorange.org.au

Facebook: www.facebook.com/jfapurpleorange

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Introduction

Thank you for the opportunity to contribute our feedback to the policy position paper on the National Disability Strategy (NDS).

Australia's first National Disability Strategy (the Strategy) was signed in 2011. The Strategy is a 10-year agreement (2010-2020) which commits all governments to a unified, national approach to 'an inclusive Australian society that enables people with disability to fulfil their potential as equal citizens'. Furthermore, the current Strategy is the primary mechanism through which Australia implements its obligations under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

The Strategy is rightly anchored on the goal of valued inclusion in community life and has the potential to create transformational change. However, the substantial changes in the disability policy area over the last 10 years, including the development of the National Disability Insurance Scheme (NDIS), have somewhat overtaken the Strategy. Even though the Strategy sets the context for the NDIS, it has become overshadowed by the NDIS, which has taken up a lot of stakeholder attention in terms of bilateral agreements, scheme design, scheme implementation, and the drama of the numbers – how many people join the scheme, over what time frame, and at what cost.

In our view, the Strategy is underpowered and performance has been overlooked due to the attention given to the NDIS. The NDIS is primarily about the provision of funded supports to eligible participants. By themselves, these funded supports will not systematically deliver disability reform to the broader disability community. It is the Strategy that should be assertively and loudly leading this, but it is hard to see any real evidence of this occurring. Very little attention has been given to reporting on and measuring outcomes from the Strategy, resulting in poor accountability and progress.

While it is promising to see that all levels of government are now taking action through the development of disability inclusion plans, it is unfortunate that these plans will not – owing to the timing of their release – align with the new Strategy (even the extent to which they align to the existing strategy varies). For example, the South Australian Government

released its first State Disability Inclusion Plan in 2020 and all state departments and local governments were required to have Disability Access and Inclusion Plans in place by October 2020. These plans have now been set for the next 4 years, at a time when the Strategy is being reviewed. We believe that national, state and local government disability plans should all be aligned and there should be a clear reporting line between these plans. Without this alignment, it is difficult to see how the Strategy can drive disability reform for Australia.

We therefore hope that all levels of government will be required to review their respective strategies once the new Strategy is released, to ensure that they align. Similarly, we believe it is essential for other relevant strategies at all levels of government (e.g. employment, education etc.) to be reviewed in light of the new Strategy.

Given the significance of the Strategy and its potential to influence the actions of Commonwealth, state/territory and local governments, we trust that the new Strategy will fully implement Australia's obligations under the UNCRPD. It is essential that the Commonwealth Government closely monitors the work of the Committee on the Rights of Persons with Disabilities and updates the Strategy and any action plans through a progressive interpretation of the UNCRPD. This will entail monitoring communications brought to the Committee regarding Australia, any General Comments developed by the Committee, and any Concluding Observations on Australia's implementation of its obligations.

Given the importance of the Strategy in driving disability reform, we are encouraged by the staged and thorough approach to the consultation for the development of the new Strategy, including a separate consultation on the outcomes framework. Developing a strong outcomes framework that is measured and reported on will be essential to the success of the new Strategy and we will provide our input to this critical area through that consultation process.

List of recommendations

JFA Purple Orange make the following recommendations in response to the questions posed in the Strategy position paper:

Recommendation 1: List inclusive communities and accessible communities as separate outcome areas in the next Strategy.

Recommendation 2: Adjust the title of Outcome area 3 to 'Rights protection, justice, *safety* and legislation'.

Recommendation 3: Adjust the title of Outcome area 3 to 'Learning, skills and leadership.'

Recommendation 4: Amend the guiding principle 'Involve and engage' to 'Involve, engage and co-design'.

Recommendation 5: Amend the description for 'Involve, engage and co-design' to include 'involved'.

Recommendation 6: Include 'Collaboration and communication' as a new guiding principle in the next Strategy.

Recommendation 7: In addition to strengthening the focus on improving community attitudes across all outcome areas, embed this as a separate outcome area (as per Recommendation 1). Through the Strategy, stimulate commitment and financial investment at all levels of government to improving community attitudes, and introduce systems and approaches to measure impact and share good practice.

Recommendation 8: Ensure that these proposed additions to the new Strategy as indicated include clearly describing the roles and responsibilities of government, including that of the NDIS, measuring outcomes, reporting on outcomes, committing to the collection of relevant data to enable effective monitoring and reporting and having a coordinated approach to the evaluation of policies and programs.

Recommendation 9: Recognise the important role NGOs play in realising the Strategy's goals, and resolve an investment plan so that NGOs that are demographic peak organisations, user-led organisations, and advocacy agencies, are able to make their contribution without anxiety about their own viability.

Recommendation 10: Recognise the important role the business sector plays in realising the Strategy's goals, and establish a formal requirement for all businesses to plan and act to eliminate the risk of discrimination in their services, products, and employment.

Recommendation 11: Adopt a shadow reporting model, similar to that used by United Nations treaty monitoring bodies.

Recommendation 12: Develop and implement a national survey at the start of the Strategy and every two years thereafter.

Recommendation 13: Publish a single report on disability reform progress in Australia. This report should include data on whether Australia is meeting its targets for each of the outcomes proposed by the Strategy, in the form of a dashboard like that used for the National Disability Agreement.

Recommendation 14: Ensure that consideration is given to how Targeted Action Plans interact with state-based plans.

Recommendation 15: Develop a national reference committee of people living with disability to provide ongoing feedback and strategic advice to governments on the implementation of the Strategy.

Our approach to preparing this submission

JFA Purple Orange has been centrally focussed for more than a decade on listening to the voices of people living with disability and undertaking research, policy analysis and consulting activities in order to ensure that these voices can be heard.

Our response to this submission has come about through the insights gained from engaging with people living with disability and their families through activities such as peer networks, capacity-building workshops, focus groups, co-design groups and through research aimed at understanding what types of policy and practice have the best prospect for advancing the life chances of the disability community.

In preparing a response to the National Disability Strategy Position Paper, JFA Purple Orange conducted a consultation with the JFA Purple Orange Co-Design Council, policy and program staff and members of Enabled Youth Disability Network.

The Co-design Council (CDC) comprises of people living with disability and families. The CDC support JFA Purple Orange and its Board by connecting them to the voices and perspectives of the SA disability community. They also provide advice to deepen Purple Orange's practice in information, peer networks, capacity building and co-design so that people living with disability and family members are participating in and driving the decision-making processes.

Question 1 – Vision and Outcome Areas

During the first stage of the consultations we heard that the vision and the six outcome areas under the current Strategy are still the right ones. Do you have any comments on the vision and the outcome areas being proposed for the new Strategy?

Vision

JFA Purple Orange supports the retention of the existing vision, with the words 'members of the community' replacing 'citizen.' We believe that momentum has built around the existing vision and it would be unwise to alter this now. It is essential that all members of the community are able to fulfil their potential, not just citizens.

Outcome areas

JFA Purple Orange broadly supports the outcome areas of the current Strategy but recommends an increased focus on community attitudes and the safety of people living with disability.

JFA Purple Orange is conscious that the priority areas in state and territory disability plans do not necessarily align with the Strategy outcome areas. While it may be appropriate for state and territory disability plans to have slightly different focus areas, we believe that there should be a clear link back to the Strategy.

Inclusive and accessible communities

JFA Purple Orange recommends splitting this outcome into two, to ensure there is sufficient focus and accountability within the Strategy with respect to inclusive attitudes and approaches. The term 'inclusive and accessible communities' goes to both attitudes and the physical environment. This can lead to the misconception that an accessible community is also automatically an inclusive one (and vice versa), however this is not always the case. For example, a government building may be physically accessible for people living with disability, however if staff inadvertently discriminate against members of the public who access the building (for example due to unconscious bias), the building would not be described as inclusive. There is also often a tendency for accessibility to overshadow inclusion when the two are grouped together. This is because addressing accessibility issues is more concrete and somewhat easier than getting to the core of attitudes and behaviour.

JFA Purple Orange believes the Strategy could be strengthened by referring explicitly to what makes communities inclusive *and* what makes communities accessible in separate outcome areas. The separation of inclusion and accessibility also allows for a greater focus on community attitudes, an area that we agree should have a heightened focus in the new Strategy.

Broadly speaking we envisage the new outcome areas to cover the following:

- **Inclusive communities** – attitudes and approaches; community campaigns; inclusion in community life; social participation programs; civic life including social, sporting, recreational and cultural life; visibility and understanding of all disability types.
- **Accessible communities** - the physical environment including public transport; parks, buildings and housing; digital information and communications technologies.

Various states and territories have split accessibility and inclusion in their disability plans. For example, South Australia’s plan is divided into four priority areas, two of which are ‘inclusive communities for all’ and ‘accessible communities.’ New South Wales’ plan includes four focus areas, one of which is ‘developing positive community attitudes and behaviours.’ Physical accessibility is addressed under the focus area, ‘creating liveable communities.’

Rights protection, justice and legislation

JFA Purple Orange supports the continued inclusion of rights protection, justice and legislation as an outcome area in the next strategy. However, we believe safety must have an increased focus and prominence. At present, a number of state/territory inclusion plans do not address safety (or make minimal reference). Particularly in light of the Disability Royal Commission into Violence, Abuse, Neglect and Exploitation, it is vital that the Strategy guides governments and other stakeholders throughout the country to ensure that people living with disability are safe. Victoria’s plan includes a pillar called ‘fairness and safety’ which covers topics such as rights, justice, advocacy and safety, indicating that this could be a logical place to cover this topic. JFA Purple Orange recommends adjusting the outcome heading ‘Rights protection, justice and legislation’ to also include safety.

We discuss our position on safety in more detail in response to Question 3.

Learning and skills

JFA Purple Orange recommends a greater focus on building leadership skills and opportunities for people living with disability in order to drive change in the community. We need to see more people living with disability in key decision making roles, bringing their

lived experience to all areas of life. JFA Purple Orange recommends amending the learning and skills outcome area to read 'Learning, skills and leadership.'

Recommendation 1: List inclusive communities and accessible communities as separate outcome areas in the next Strategy.

Recommendation 2: Adjust the title of Outcome area 3 to 'Rights protection, justice, *safety* and legislation'.

Recommendation 3: Adjust the title of Outcome area 5 to 'Learning, skills and leadership.'

Question 2 - Guiding Principles

What do you think about the proposed guiding principles?

JFA Purple Orange supports the suggested guiding principles with consideration of the points listed below:

Involve and engage

Strengthening this guiding principle so that people living with disability are part of the decision making. All too often we see people living with disability are consulted about decisions that impact them, but they don't get a seat at the decision making table. We want to see this new Strategy have a focus on co-design to ensure people living with disability play a stronger role in the decision making process. Practically speaking, this would mean people living with disability are involved in identifying solutions and the implementation of new measures rolled out under the Strategy, instead of just being asked what they think of pre-determined solutions and measures.

JFA Purple Orange recommends including the term co-design in the guiding principle, making it "Involve, engage and co-design". While the descriptor indicates a co-design approach, this needs to be stated explicitly.

Descriptor words should also include the word 'involved' as shown:

'has the policy process or program design engaged with, listened to and involved people with disability at all stages of planning and implementation...''

Recommendation 4: Amend the guiding principle 'Involve and engage' to 'Involve, engage and co-design'.

Recommendation 5: Amend the description for 'Involve, engage and co-design' to include 'involved'.

Collaboration and communication

According to the Position Paper, the guiding principles are intended to be used to guide the development of policy and the design of programs by all levels of government and non-government organisations. For the next Strategy to succeed governments and civil society must not work in silos on policy and program development. The importance of intersectionality and contribution of all government agreements, policies and initiatives is paramount to the success in achieving change over the next decade. Given the significance of collaboration and communication, JFA Purple Orange is of the opinion this needs to be included as a new guiding principle.

Recommendation 6: Include 'Collaboration and communication' as a new guiding principle in the next Strategy.

Question 3 – Community Attitudes

What is your view on the proposal for the new Strategy to have a stronger emphasis on improving community attitudes across all outcome areas?

One of the most common issues raised with JFA Purple Orange by people living with disability is the prevalence of negative attitudes towards, and a corresponding lack of understanding and appreciation of, people living with disability.

In a survey we conducted in June 2020, we asked respondents to choose whether they would describe the attitudes of non-disabled Australians towards Australians living with disability as very positive, positive, neutral, negative or very negative. Of the 65 people who answered this question, fifty-one per cent said negative or very negative, 32 per cent said neutral and 16 per cent said positive. No one said very positive.

Negative attitudes pervade everyday life for many people living with disability. When asked about the context in which they encounter such attitudes, respondents to the 2020 survey emphasised that they are everywhere, all the time. They explained that a non-inclusive mindset is engrained in our culture and way of life from early childhood, through schooling, and continuing into employment.

Respondents explained that negative attitudes are commonly displayed by strangers in public, such as in shopping centres, on public transport or at events. Young people are often the least respectful. Many respondents commented on the prevalence of negative attitudes in employment settings, as well as educational institutions. They also noted that some service providers, particularly in the health sector, fail to understand people living with disability and treat them poorly.

Changes to community attitudes will be at the core of the success of the new Strategy. Affecting change in community attitudes to the magnitude required to create inclusive communities, will require a strong policy commitment within the Strategy, combined with a significant financial investment.

While community attitudes are front and centre of all of the aspects of the Strategy, it is the view of JFA Purple Orange that embedding a focus on community attitudes in the Strategy by having a separate outcome area as we have described under Question 1 will be crucial. This will improve visibility and accountability and ensure direct actions are created to make shifts in this area.

Further to this, it is necessary to build on the evidence base on what works for disability awareness and changing community attitudes and beliefs. A government commitment to

invest in community awareness campaigns should be accompanied by funding for a Centre of Excellence or repository for collating and disseminating best practice.

In addressing community attitudes under the Strategy, it would be valuable to consider previous policy reform initiatives implemented by the Australian government. For example, under the National Mental Health Strategy and subsequent mental health plans, beyondblue: the national depression initiative was established by the Federal and Victorian Governments in October 2000. This was a nation-wide initiative with strong bipartisan political support initiated to address the low levels of depression literacy, high stigma in the community and low levels of help-seeking behaviour.

Broad scale campaigns

A Commitment to affecting community attitudes requires a commitment to broad scale, national campaigns that encompass paid advertising. Such campaigns would need to be led by and include people with a disability.

As pointed out by the Co-Design Council, the Moment of Me stories¹ produced by JFA Purple Orange have had a huge impact on people identifying with people living with a disability and in humanising disability. It was suggested,

“if we could have that kind of campaign on a broader level where we are promoting ourselves as being human and addressing fear, it would be a great start”.

Targeting schools and employers

Commitment to broad scale national campaigns, must be accompanied by policies and programs targeting specific communities such as businesses and schools.

¹ ‘Moment of Me’ allows people living with disability to share a part of their story with the broader community in their own words, similar to Humans of New York.

Attitudinal change is interlinked to people living with a disability being visible in the community. Attitudinal change will not happen unless the disability community is visible, working in mainstream employment, accessing mainstream services and participating in mainstream classrooms.

Investment in attitudinal change of employers is paramount to improving rates of employment, as identified by members of the Co-Design Council, a focus on attitudinal change should, “include targeted advertising led by disabled people that shows we can be in employment”.

Targeting the media

The media can play a huge role in setting the tone of local and national conversations about people living with disability and establish societal norms.² Well-meaning publications may inadvertently use negative stereotypes when describing people living with disability, resulting in lower expectations from other members of the public about the skills and potential people living with disability can contribute to society. However, the media also represents an enormous opportunity to communicate information about the Strategy and what it hopes to achieve over the next decade. JFA Purple Orange believes the Department could take a leading role in working with the media to ensure unconscious bias does not find its way into the reporting of stories involving people living with disability.

Community attitudes and the link to safety

Informal safeguards are examples of the concept that people living with disability are more likely to be safe when they are actively involved with their family and the community. The things that make people safe can be seen as the same things that are needed to have ‘a good life’. For example, caring relationships and enhanced opportunities for participation in

² United Nations, Department of Economic and Social Affairs, Disability and the Media, available at <https://www.un.org/development/desa/disabilities/resources/disability-and-the-media.html>, accessed 4 November 2020.

daily life are examples of this. JFA Purple Orange therefore believes that freely given relationships are the greatest protections or safeguards for people living with disability. We continue to advocate that the best tool we can use to safeguard a person living with disability is to support them to take up their rightful place at the heart of their community. In doing this we make it more likely that there will be 'natural safeguards' present in that person's life such as family, neighbours, acquaintances, friends, co-workers, just like there is for other citizens.

One of the best ways to ensure that people living with disability have these 'natural safeguards' in their life is if community member attitudes and awareness to these issues can be improved.

Recommendation 7: In addition to strengthening the focus on improving community attitudes across all outcome areas, embed this as a separate outcome area (as per Recommendation 1). Through the Strategy, stimulate commitment and financial investment at all levels of government to improving community attitudes, and introduce systems and approaches to measure impact and share good practice.

Question 4 – Government Responsibilities

How do you think that clearly outlining what each government is responsible for could make it easier for people with disability to access the support and services they need?

JFA Purple Orange fully supports the proposed changes for increased accountability to ensure all levels of government (Commonwealth, state and territory and local governments) have a key role in driving change. By clearly outlining what each government is responsible for, people living with disability are less likely to end up stuck between systems.

There is a risk that the focus on the NDIS might inadvertently lead to mainstream programs and services feeling less of an imperative to take responsibility for driving outcomes for people living with disability, on the basis that disability is taken care of somewhere else. Disability is a natural part of human diversity and communities need to ensure that they

fully include people living with disability in all aspects of life, this includes ensuring that mainstream services and facilities that are part of ordinary Australian life are accessible to and welcoming of people living with disability.

In relation to service delivery, it will be important for data collection to focus on all services people living with disability access, not just those funded through the NDIS. Clear communication about the roles and responsibilities of each level of government is needed so that there is broader understanding about where people living with disability should go to access and the support they need. It will also be essential for governments to contemplate how they will determine what services *are* needed, as lack of uptake may be due to factors such as location or price, not due to the absence of need.

Recommendation 8: Ensure that these proposed additions to the new Strategy as indicated include clearly describing the roles and responsibilities of government, including that of the NDIS, measuring outcomes, reporting on outcomes, committing to the collection of relevant data to enable effective monitoring and reporting and having a coordinated approach to the evaluation of policies and programs.

Question 5 – Role of the Non-Government Sector

How do you think the Strategy should represent the role that the non-government sector plays in improving outcomes for people with disability?

JFA Purple Orange believes that the Strategy should promote a cohesive and consistent approach to disability inclusion across all sectors, both government and non-government. The Strategy could be the tool through which the efforts of all stakeholders in the disability sector throughout Australia are coordinated, resulting in far greater efficiency and effectiveness. To this end, the Strategy could envisage the use of incentives for non-government actors.

NGOs – advocacy and programs

JFA Purple Orange believes the next Strategy should acknowledge the important role the non-government sector plays in improving outcomes for people living with disability. The non-government sector is unique due to the many and varied roles it plays: service provider, employer, advocate, researcher etc. NGOs in particular have a significant role to play in advocacy, collaborative consultation, capacity building, peer support, mentoring, connecting to community, education and delivery of services. NGOs also have a leadership role in supporting and promoting co-design in education and employment. In JFA Purple Orange's experience, utilising co-design in the employment context has assisted employers and employees to build their disability confidence and be in a better position to employ people living with disability.

NGOs also have an important role in holding governments to account. For example, organisations can identify gaps in service delivery and highlight where policy is not resulting in the intended outcomes. Highlighting such deficits can take place through responding to public consultations initiated by government departments or parliaments, or by self-initiating feedback. JFA Purple Orange recommends that NGOs be invited to submit 'shadow reports' that align with governments' reporting requirements under the Strategy, as explained below under 2.6.

While the roles of NGOs may be expansive, their funding is not. It is therefore vital that the next Strategy does not place an unfair over-reliance on these organisations in achieving the Strategy's outcomes. This could be achieved by clearly explaining the roles and responsibilities of governments and the non-government sector in implementing the strategy. This could be done by adding a section to the Strategy that recognises the contribution that NGOs can make to the Strategy, and committing to an investment plan that ensures the NGO sector has sufficient financial sustainability to be a contributor to Strategy activities and goals throughout the life of the Strategy.

This is particularly important for NGOs that are demographic peak organisations, user-led organisations, and advocacy agencies, who despite the high relevance and potency of their activities are often the NGOs with the greatest uncertainty about their financial

sustainability. For the Strategy to be a success, it needs the involvement and contribution of these organisations, and this should not be compromised by preoccupation with financial sustainability.

Recommendation 9: Recognise the important role NGOs plays in realising the Strategy's goals, and resolve an investment plan so that NGOs that are demographic peak organisations, user-led organisations, and advocacy agencies, are able to make their contribution without anxiety about their own viability.

Businesses

The next Strategy must contemplate the dual roles business play in society: providers of goods and services as well as employers.

According to the Australian Bureau of Statistics, the labour force participation rate in 2018 for working age people living with disability was 53.4 per cent compared to 84.1 per cent of people without disability.³ The benefits of engaging in paid employment are well known and include a greater sense of wellbeing, purpose and connection with others in addition to more financial independence.

JFA Purple Orange believes the next strategy should encourage all businesses to create Disability Action Plans which are a way for businesses to work towards the elimination of discrimination in the provision of goods and services as well as in their employment policies and practices.⁴ This view was supported by our Co-design Council, who went one step further and also recommended inclusion quotas for people living with disability:

³ Australian Bureau of Statistics. 2019. Autism in Australia. [ONLINE] Available at: <https://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/4430.0Main+Features102018>. [Accessed 9 July 2020].

⁴ Australian Human Rights Commission, Action Plan and Action Plan Guides, available at <https://humanrights.gov.au/our-work/disability-rights/action-plans-and-action-plan-guides>, accessed 4 November 2020.

“overseas there are quotas on number of people living with disability working in organisations”.

While some large businesses are already leading the way by developing Disability Action Plans, JFA Purple Orange would like to see more support for small and medium businesses to create these plans so that disability access and inclusion is considered by all businesses, regardless of their size.

Recommendation 10: Recognise the important role the business sector plays in realising the Strategy’s goals, and establish a formal requirement for all businesses to plan and act to eliminate the risk of discrimination in their services, products, and employment.

Question 6 – Reporting of Progress

What kind of information on the Strategy’s progress should government make available to the public and how often should this information be made available?

The current NDS is not well-reported on, so it is hard to assess how COAG are measuring and judging performance against this plan or, more specifically, against disability outcomes in Australia. The Commonwealth Government undertook to provide two-yearly progress reports to COAG on the progress of the NDS, but it appears that the last report was in 2016. In comparison to other major reform areas such as Closing the Gap in Indigenous Disadvantage, the monitoring of disability reform in Australia appears to be falling behind.

As the next Strategy will cover a period of ten years, regular reporting will be essential to ensure progress is continually being made throughout the life of the plan and to avoid a rush at the end to try to catch-up on outcomes that may have been missed in the Strategy’s early years. JFA Purple Orange supports the proposal in the discussion paper (a yearly public statement by the Ministerial Council setting out actions taken to implement the Strategy as well as reports every two years which analyse progress).

JFA Purple Orange recommends that the Strategy also adopt a shadow reporting model, similar to that used by United Nations treaty monitoring bodies. For example, when States Parties to the UNCRPD report to the Committee on the Rights of Persons with Disability, civil society is also invited to lodge 'shadow reports.' These provide detailed, evidence-based information about the State Party's progress and gaps in implementing its obligations. This serves as an important accountability measure which assists the Committee to fairly assess progress and recommend actions going forward.

The structure of reporting under the Strategy is obviously different as the responsible Minister will report to parliament, rather than an entirely independent entity. However, JFA Purple Orange believes that publishing shadow reports alongside any government-generated progress report (and tabling these in parliament) would result in a stronger system of accountability. It is essential that regular reporting highlights not only progress made under the Strategy, but also gaps and issues that need to be addressed. Civil society is best placed to provide this critical lens.

In order to assess whether the lives of people living with disability are improving as a result of the Strategy, the Department will need to obtain baseline data against which to measure progress. This could be achieved by rolling out a national survey at the start of the Strategy and every two years thereafter. The survey should ask questions about all people's perceptions about the outcome areas of the Strategy and how they are currently experienced by people living with disability. It is important that this survey is open to everyone, not just people living with disability, as this will identify where gaps exist between perception and reality for people living with disability. For example, survey questions could reveal that non-disabled people believe their local community is more accessible and inclusive than it was two years ago, however people living with disability may have a different view on this.

Currently the Productivity Commission produces a dashboard⁵ that relates to the outcomes⁶ contained in the National Disability Agreement which indicates whether Australia is meeting the objectives of the Agreement. For example, the dashboard shows that participation in social and community activities by people living with disability has decreased since 2009 and as a result this objective has not been met. JFA Purple Orange recommends that the Productivity Commission publish statistics and reports on whether Australia is meeting its targets for each of the outcomes proposed by the Strategy in the form of a dashboard like that used for the National Disability Agreement. Furthermore, JFA Purple Orange recommends that a single set of outcome measures are developed to measure disability reform progress in Australia.

Ideally, we would like to see quotas or at least reporting introduced for each government department on the number of people they employ with a disability. This is important from a leadership perspective to drive change across all sectors.

Recommendation 11: Adopt a shadow reporting model, similar to that used by United Nations treaty monitoring bodies.

Recommendation 12: Develop and implement a national survey at the start of the Strategy and every two years thereafter.

Recommendation 13: Publish a single report on disability reform progress in Australia. This report should include data on whether Australia is meeting its targets for each of the outcomes proposed by the Strategy, in the form of a dashboard like that used for the National Disability Agreement.

⁵ Productivity Commission, Performance Reporting Dashboard, Disability, available at <https://performancedashboard.d61.io/disability>, accessed 6 November 2020.

⁶ People with disability achieve economic participation and social inclusion, people with disability enjoy choice, wellbeing and opportunity to live as independently as possible, families and carers are well supported.

Question 7 – Targeted Action Plans

What do you think of the proposal to have Targeted Action Plans that focus on making improvements in specific areas within a defined period of time?

JFA Purple Orange supports the use of Targeted Actions Plans as a way to increase focus on specific areas of the Strategy within a defined period of time. Targeted Action Plans will also enable the Strategy to be more responsive to the changing landscape and capitalise on this. These Targeted Action Plans should clearly describe the issue that needs to be resolved and who is responsible for implementing the agreed actions.

We note that several states in Australia are requiring government departments to implement Disability Access and Inclusion Plans (or similar). While each state will have their own reporting criteria and cover potentially different reporting periods, all plans should align with the Strategy. JFA Purple Orange sees merit in all governments working together to harmonise the criteria and reporting periods for Disability Access and Inclusion Plans and also encourages the Department to consider how Targeted Action Plans will interact with these state-based plans.

Recommendation 14: Ensure that consideration is given to how Targeted Action Plans interact with state-based plans.

Question 8 – Engagement Plan

How could the proposed Engagement Plan ensure people with disability, and the disability community, are involved in the delivery and monitoring of the next Strategy?

For people living with disability to make effective contributions in the delivery and monitoring of the strategy there needs to be adequate government investment in building leadership skills for example through ongoing support for peer network development. People living with disability are experts in their own lives and should be given every opportunity to self-advocate and provide lived experience insights into whether the Strategy's objectives are being achieved.

JFA Purple Orange would like to see greater oversight from people living with a disability in terms of monitoring the Strategy. The Co-Design Council have recommended a national

reference committee of people living with disability which is supported by six working groups, one for each outcome area.

Such a structure could provide ongoing feedback and strategic advice to governments on the implementation of the Strategy, providing a mechanism for highlighting progress and shortfalls. It will also allow the transparency required to report back on the progress of the Strategy to people living with disability and the wider community.

As the NDIS continues to roll out and the Scheme matures, attention will need to be paid to how the supports provided to people living with disability are helping to achieve not only their personal goals, but the Strategy's outcomes. Changes to the NDIS should incorporate greater input from people living with a disability and an auditable co-design approach should be adopted. It is also important for all stakeholders to recognise that the NDIS is not accessed by all people living with disability and should not be viewed as a silver bullet for addressing issues faced by the disability community. JFA Purple Orange recommends that any monitoring of the Strategy goes beyond how it interfaces with the NDIS and contemplates other systems and schemes people living with disability interact with.

Recommendation 15: Develop a national reference committee of people living with disability to provide ongoing feedback and strategic advice to governments on the implementation of the Strategy.

Conclusion

We thank Department of Social Services for allowing the opportunity to respond to this important position paper. We trust the feedback and recommendations in this submission are helpful in finalising the development of the Strategy. We welcome, and request, the opportunity to meet with the Department on these matters, in the hope we can be of further assistance to the development of the Strategy.