



National Disability Strategy Governance and Engagement Section
Department of Social Services
GPO Box 9820
Canberra, ACT 2601
disabilityreform@dss.gov.au

16 December 2020

Dear Members of the National Disability Strategy Governance and Engagement Section,

Re: National Disability Strategy and National Disability Insurance Scheme Outcomes Frameworks

NAVA welcomes the opportunity to contribute to the NDS and NDIS Outcome Frameworks through responding to the *Outcome Frameworks Introductory Paper*.

The National Association for the Visual Arts (NAVA) is the peak body representing the professional interests of the Australian visual and media arts, craft and design sector, comprising of 50,000 practitioners, galleries and other art organisations. Through the Code of Practice for the Professional Australian Visual Arts, Craft and Design Sector, NAVA sets best practice standards for the industry. Since its establishment in 1983, NAVA has been influential in bringing about policy and legislative change to encourage the growth and development of the visual arts sector and to increase professionalism within the industry.

NAVA supports the outcomes outlined in the *Outcome Frameworks Introductory Paper* as ways of tracking the effectiveness of the NDS and NDIS. However, we encourage the government to be ambitious in setting outcomes in line with the main objective of having a real impact on improving the lives of people with a disability. Rather than aiming for people with disability to earn an adequate income we should be aiming for people with disability to earn the level of income they wish to earn which may be more than an 'adequate' income. Instead of simply aiming for people with disability to be employed, the goal should be for people with disability to have a job in a field which they have chosen and that they find fulfilling. By having more ambitious aims we can work towards equity.

What matters most to measure and report on as we seek to achieve inclusive and accessible communities for people with disability?

People with disability must be able to access and participate in all spaces, equally and fairly. Within the arts there is a disparity in the ability for organisations to ensure that their physical spaces and facilities as well as their online presence and their programs and services are accessible. Organisations which are volunteer run or those which operate on very small budgets, with little government support do not have the resources, financial or otherwise to make reasonable adjustments to achieve inclusive and accessible spaces, facilities and programs for their audiences and the artists and arts workers that they work with. In order for people with disability to be able to live in accessible and well-designed communities with full inclusion in cultural life, arts and cultural spaces need to be supported and be given clear guidelines on how to achieve this.

For example, in response to distancing requirements at the onset of the coronavirus crisis, many galleries and other arts venues were quick to upskill and deliver their exhibitions, performances and discussions online. The impact of this has been increased access and inclusion, diversified audiences and new connections - both nationally and internationally.

While the unexpected virtual art experience offered increased access for some people with disability in many new ways, overall, there has been a lack of alternatives to online visual content delivered across the industry, such as Auslan, closed captioning, audio description, transcripts of recordings or the use of alt-text and image descriptions. Without the infrastructure, training and policy to support access, innovation and the digital environment, the move online disproportionately affected people living with disability due to the perceived cost barriers to achieve inclusive and accessible programs for people with disability.

What is most important to measure and report on as we seek to achieve economic security for people with disability?

Employment for people with disability is an important outcome to measure, however people with disability are 40 times more likely to be self-employed¹ than the rest of the population. Artists and arts workers are most commonly self-employed and this needs to be recognised as a legitimate form of employment for people with disability and a strong outcome measure. People with disability who are self-employed also need to be supported in this as well as supporting the organisations who contract artists and arts workers with disability to make reasonable adjustments just as employers do for their employees. Many arts organisations find making adjustments to work with artists or arts workers with disability difficult and expensive which then creates a barrier to these artists and arts workers in generating income.

The report *Australia's Disability Entrepreneurial Ecosystem*² further elaborates on the importance of self-employment for people with disability in building a sense of purpose, contribution and financial security however there are barriers such as access to the business environment, networking opportunities, mainstream funding and general societal attitudes regarding people with disability.

What is most important to measure and report on as we seek to achieve rights, protection, justice and legislation outcomes for people with disability?

Societal attitudes towards people with disability are a difficult outcome to measure but are a major barrier for people with disability in achieving their rights and the other outcomes in this framework. As previously mentioned societal attitudes need to be challenged in order for people with disability to be able to access and participate in arts and culture, and to enable them to be employed or self-employed in a more equitable manner. More specific guidelines could be provided to the community in general regarding legal requirements around access to support organisations and businesses in making the required adjustments. This puts the onus on the service provider rather than on people with disability and their advocates who must challenge societal attitudes every day in order to be safe and have their rights upheld and protected.

¹ Study of entrepreneurs with disability smashes stereotypes, 2020, UTS Business School
<https://www.uts.edu.au/news/business-law/study-entrepreneurs-disability-smashes-stereotypes>

² Darcy, S., Collins, J., Stronach, M. 2020 Australia's Disability Entrepreneurial Ecosystem: Experiences of People with Disability with microenterprises, self-employment and entrepreneurship, UTS Business School
<https://www.uts.edu.au/sites/default/files/article/downloads/Australias%20Disability%20Entrepreneurial%20Ecosystem%20Report%201%20%28Accessible%29.pdf>

What is most important to measure and report on as we seek to achieve learning and skills outcomes for people with disability?

Part of supporting people with disability in being self-employed is giving them the access to learning opportunities through entrepreneurship programs and other forms of training that are available to all Australian's who run their own businesses. All types of education and training programs need to be available to people with disability, or designed specifically for people facing the same barriers, including training which can strengthen skills which will support other outcome areas such as employment and community participation.

The report Australia's Disability Entrepreneurial Ecosystem³ highlighted that "entrepreneurs with disability lamented a lack of entrepreneurial education...When schemes including incubator and accelerator programs are available and accessible, entrepreneurs with disability are likely to benefit. However, mainstream entrepreneurial training programs are not inclusive of disability type nor the level of support needs of entrepreneurs with disability."

What is most important to measure and report on as we seek to achieve personal and community support outcomes for people with disability?

In order for people with disability to achieve personal and community support outcomes the services in place to support them must also be working in line with the outcomes framework. When it comes to self-employed artists and arts workers, the report Australia's Disability Entrepreneurial Ecosystem found that "Compliance with regulation agencies such as Centrelink, NEIS schemes and the National Disability Insurance Scheme (NDIS) are cumbersome, confronting and laborious, and at this stage, the ongoing benefits of the NDIS to entrepreneurs with disability in Australia are unclear." In order to have effective systems and supports appropriate to the needs of people with disability they must be flexible, compliment each other and be working towards the same goals.

Is there anything else that you think should be considered when we are monitoring and measuring the impact of activities on people with disability?

NAVA also highlights the need for a mechanism which measures these outcomes in a way that is self-determined by people with disability. The way in which outcomes are measured will determine whether the main objective of the National Disability Strategy - to have a real impact on improving the lives of people with disability, is truly achieved.

If you require any further information, please do not hesitate to contact us.

Sincerely,

Holly Morrison
Best Practice and Finance Coordinator

³ Darcy, S., Collins, J., Stronach, M. 2020 Australia's Disability Entrepreneurial Ecosystem: Experiences of People with Disability with microenterprises, self-employment and entrepreneurship, UTS Business School
<https://www.uts.edu.au/sites/default/files/article/downloads/Australias%20Disability%20Entrepreneurial%20Ecosystem%20Report%201%20%28Accessible%29.pdf>