



Response to the new National Disability Strategy Position Paper

With specific recommendations on housing



30 October 2020



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Executive summary

The Australian Network for Universal Housing Design (ANUHD) is a national network of designers, builders, researchers and home occupants who believe that housing is a vital infrastructure which should respond to the Australians' current and future needs.

ANUHD acknowledges Australia's obligations under the UN Convention on the Rights of Persons with Disabilities and considers the 2010-2020 National Disability Strategy interprets this obligation into a vision, principles and outcome areas to the satisfaction of most people with disability and their families.

As a member of the National Dialogue for Universal Housing Design, ANUHD supported the aspirational target of all "*aspirational target that all new homes will be of an agreed Universal Housing Design standard by 2020 with interim targets to be set within that 10-year period*"¹ as a key commitment for Outcome 1, Policy Direction 3 in the 2010-2020 National Disability Strategy.

This initiative failed to reach the 2020 target or any of the interim targets. It was ANUHD's persistent efforts over the last decade that brought this failure to COAG's and the broader community's attention. To our dismay, departmental progress and implementation reports on the 2010-2020 National Disability Strategy to COAG and the UN Committee on the Rights of Persons with Disabilities largely disregarded the Livable Housing Design commitment; and misrepresented to the United Nations the lack of progress that had been made. The shadow reports revealed the failure of the Livable Housing Design commitment to the UNCRPD, which in turn recommended in 2019 that Australia mandate a minimum access standard in all new and extensively modified housing.

From this experience, ANUHD learnt the following lessons:

1. The advocacy for change is typically left to those most affected when it is politically and economically inconvenient for those who are responsible.
2. The reporting of outcomes must come from both government and independent advocates for the truth to emerge.
3. For a new National Disability Strategy to be implemented, government officers must be free to champion its cause and to negotiate with three levels of government, business and the community sector without fear or favour.

ANUHD recommends:

- The vision, principles and outcome areas remain unchanged.
- An Office of National Disability Strategy to be established to provide the mechanism to work across all governments and sectors to develop, monitor and report on Targeted Action Plans.
- Funding for independent disability advocacy organisations that will provide alternative reports and call those responsible to account when they fail to act on their commitments.

Specific recommendations for a housing strategy

1. **Australia needs a national housing strategy with a principled and long-term vision for equitable and individualised housing assistance, social inclusion,**

and greater choice and control in the housing options offered to all people including people with disability.

- 2. The concept of universal design as defined in the UNCRPD should be integrated in all targeted action plans for housing in the National Disability Strategy.**
- 3. Amendments should be made to the National Construction Code to require at least Gold Level access in all new and extensively modified housing.**
- 4. Develop mainstream strategies and generic platforms to match accessible housing with the households that are seeking it.**
- 5. There should be national standardisation, quality assurance and data collection of government-funded home modifications to optimise their efficiency and effectiveness within the broader housing and human service sectors.**

Response to the new National Disability Strategy Position Paper

This paper is the response by Australian Network for Universal Housing Design to the new National Disability Strategy Position Paper.

Background

Australian Network for Universal Housing Design

The Australian Network for Universal Housing Design (ANUHD) is a national network of designers, builders, researchers and home occupants who believe that housing is a vital infrastructure which should respond to the Australians' current and future needs.

Since 2002, ANUHD has called for minimum access features for all new and extensively modified housing to be mandated in the National Construction Code. ANUHD considers that the Livable Housing Design Guidelines (LHDG) Gold level should be the minimum level of access².

In 2009, ANUHD joined the National Dialogue on Universal Housing Design (See Appendix 1) in a bid to work collaboratively with the housing industry and community sector toward a voluntary approach.

ANUHD acknowledged COAG's interpretation of Australia's obligations was a signatory of the United Nations Convention on the Rights of Persons with Disabilities and the Optional Protocol³, in the 2010-2020 National Disability Strategy⁴. ANUHD particularly endorses the policy to work "*across all levels of government and across all portfolios*" (p. 9) as well as "*businesses and the wider community*" (p. 22). The National Dialogue's "*aspirational target that all new homes will be of an agreed Universal Housing Design standard by 2020 with interim targets to be set within that 10-year period*"¹ was a key commitment (called the Livable Housing Design commitment) for Outcome 1, Policy Direction 3. For this commitment to be met, it required this government and cross-sector collaboration.

Failure to act on the commitment

By 2014, the planned industry-led voluntary approach to provide accessibility in all new housing had failed. It was clear that the 2020 target or any interim targets would not be met. Counter to the recommendation by the National Dialogue for regular progress reviews, no remedial action was taken by governments or the housing industry leaders.

ANUHD did its own review in 2015⁵, and alerted COAG directly (including its Building Ministers' Forum) that, without government intervention, less than 5% of the aspirational target would be met.

To our dismay, departmental progress and implementation reports on the 2010-2020 National Disability Strategy to COAG and the UN Committee on the Rights of Persons with Disabilities (UN Committee) largely disregarded the commitment; and misrepresented to the United Nations the lack of progress that had been made⁶. The reports to the UN Committee from independent advocacy organisations revealed the failure of Livable Housing Design commitment, which in turn recommended in 2019 that Australia mandate a minimum access standard in all new and extensively modified housing⁷.

In 2017, the Building Ministers' Forum (BMF) directed that “a *national Regulatory Impact Assessment (RIA) be undertaken as soon as possible to consider applying a minimum accessibility standard for private dwellings in Australia*”⁶ and “*the RIA will examine the silver and gold performance levels as options for a minimum accessible standard; use a sensitivity approach; and be informed by appropriate case studies*”⁸.

The Australian Building Codes Board (ABCB)'s Accessible Housing Project (the Project) is the outcome of this directive. The Project, thorough a Regulatory Impact Assessment process, is evaluating a number of possible minimum accessibility standards for housing that would be incorporated in the May 2022 revision of the National Construction Code (NCC)⁹.

What have we learnt?

1. The advocacy for change is typically left to those most affected when it is politically and economically inconvenient for those who are responsible.
2. The reporting of outcomes must come from both government and independent advocates for the truth to emerge.
3. For a new National Disability Strategy to be implemented, government officers must be free to champion its cause and to negotiate with three levels of government, business and the community sector without fear or favour.

With these lessons in mind, we respond to National Disability Strategy Position paper.

General

We note that the current Strategy seeks to promote and guide action and reform across all Australian governments, private enterprises and the broader community and is the primary mechanism through which Australia implements its obligations under the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD).

We note the references to the following documents:

- the Senate Inquiry report into the delivery of outcomes under the *National Disability Strategy 2010-2020* to build inclusive and accessible communities (2017)^a
- the Social Policy Research Centre's independent review of the implementation of the current Strategy (2018)^b
- the Productivity Commission Review of the National Disability Agreement (2019)^c
- the Australian Government report and the Civil Society report to the United Nations Committee on the Rights of Persons with Disabilities and the UN Committee's Concluding Observations (2019).

We note that:

- the purpose of the Position Paper is to provide an overview of the proposed architecture of the new Strategy. It does not provide a list of initiatives governments propose to implement over the life of the new Strategy.

^a https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/AccessibleCommunities/Report

^b https://www.dss.gov.au/sites/default/files/documents/04_2019/review-implementation-national-disability-strategy-2010-2020-final-report.pdf

^c <https://www.pc.gov.au/inquiries/completed/disability-agreement/report>

- the new Strategy will be published following agreement from all levels of government.

Vision

ANUHD considers the vision of “**an inclusive Australian society that enables people with disability to fulfil their potential as equal members of the community**” remains relevant and should not be changed.

Outcome areas

ANUHD considers the six outcome areas of the current Strategy are still the right outcome areas to focus on in the new Strategy and should remain unchanged. These are:

1. Inclusive and accessible communities
2. Rights protection, justice and legislation
3. Economic security
4. Personal and community support
5. Learning and skills
6. Health and wellbeing

Question 1:

During the first stage of 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 outcome areas being proposed for the new Strategy?

Response 1. **Keep the existing vision and outcome areas as part of the new Strategy. There is no reason to change their order or wording, in particular, ‘citizens’ to ‘members of the community’. Accountability for action is where the change is required.**

The 2010-2020 National Disability Strategy⁴ provided “a *shared agenda to help achieve the vision of an inclusive Australian society that enables people with disability to achieve their full potential as equal citizens*”. It was supposed to “*guide governments at all levels, together with business and the community sector, to consider the needs and rights of people with disability*” (p. 15). The new Strategy needs more than a shared agenda; it requires a mechanism with measurable outcomes, clearly defined responsibilities, and a champion that will bring these various stakeholders together.

It also requires external monitoring by independent disability advocacy organisations to call people responsible to account.

Guiding principles

In addition to the principles set out in Article 3 of the UN CRPD, the agreed principles remain relevant and should not be changed:

- Involvement of people with disability—the views of people with disability are central to the design, funding, delivery and evaluation of policies, programs and services which impact on them, with appropriate support and adjustment for participation.

- **Community engagement**—a whole-of-community change effort is required to remove barriers and support inclusion of people with disability in the life of their communities.
- **Universal approach**—products, services, environments and communities are accessible and usable by all people to the greatest extent possible without the need for specialised modification.
- **Life course approach**—takes into account a person’s likely needs and aspirations over their lifetime, paying particular attention to milestones and times of transition.
- **Person-centred**—policies, programs and services for people with disability are designed to respond to the needs and wishes of each individual.
- **Independent living**—the provision of services and equipment that facilitate the greatest level of independence and the enjoyment of a lifestyle that reflects the choices of people with disability.
- **Interconnectivity**—governments work together to ensure interconnectivity of policies and programs. (p. 22)

The new National Disability Strategy should evidence how it is informed by and situated within Australia’s response to the UN Sustainable Development Goals (SDGs) (See Appendix 2). The Sustainable Development Goals are the blueprint to achieve a better and more sustainable future for all. They address the global challenges we face, including poverty, inequality, climate change, environmental degradation, peace and justice. The National Disability Strategy is cited to ensure that policy settings touching on a number of SDGs— including health, education, employment, income support systems and infrastructure—are inclusive of people with disability¹⁰.

Question 2:

What do you think about the guiding principles proposed here?

Response 2. **Maintain the original principles in the 2010-2020 National Disability Strategy. Priority areas should be addressed in the development of Policy Directions under each Outcome. Situate the principles within and refer to Australia’s mainstream response to the UN Sustainable Development Goals.**

Focusing the issue of attitudes as a community problem addresses only part of the problem. If all levels of government exemplified non-discriminatory, inclusive practices, then businesses and communities would follow.

Question 3:

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

Response 3. **Improving community attitudes should be an ongoing priority. Governments should first lead by example in demonstrating improved attitudes to people with disability, legislating and providing incentives for others to do the same. Then community and business sectors will follow.**

Strengthening accountability

In this regard, ANUHD agrees that all levels of government (Commonwealth, state and territory and local governments) have a key role in driving change. ANUHD supports the proposal to enhance government accountability by:

- clearly describing the roles and responsibilities of government, including that of the NDIS
- measuring and reporting annually on outcomes
- collecting and disseminating relevant data to enable effective monitoring and reporting
- having a coordinated approach to the evaluation of policies and programs.

Question 4

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

Response 4. **Establish an Office of National Disability Strategy under the oversight of the Disability Reform Council, as a champion for the revised National Disability Strategy after 2020. Fund independent disability advocacy organisations to monitor the progress of the National Disability Strategy and to report regularly to the UN Committee on the Rights of Persons with Disabilities.**

Question 5

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

Response 5. **See our response 3: Governments should first lead by example in demonstrating improved attitudes to people with disability and providing legislation and incentives for others to do the same. Then community and business sectors are more likely to follow.**

Noted in our introduction, the 2010-2020 National Disability Strategy committed to support an agreement between housing industry, community and human rights leaders to a strategic plan to provide minimum accessibility in all new housing by 2020, with interim targets to be reviewed every two years. This did not happen.

The Australian governments, with the housing industry, largely disregarded the Livable Housing Design agreement, and misrepresented to the United Nations Committee the lack of progress made in achieving accessibility within the housing stock in the last decade. ANUHD takes the position that unenforceable policies do not ensure meaningful change.

Question 6

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

Response 6. **Defined outcomes, points of responsibility and measurable targets are useful. These do not guarantee action. They require a champion to make them happen and independent advocates to call those responsible to account when they do not.**

Measurement of success should be based primarily on the improved life experiences of people with disability.

Putting policy into action

ANUHD acknowledges that data are essential for measuring outcomes and tracking progress. Given the previous response, the data are more likely to lead to outcomes if it:

- is collected and analysed independently
- is available to everyone.
- measures all aspects of life, not just services, payments and programs.

Question 7

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 (for example within one, two or three years)?

Response 7. **ANUHD supports Targeted Action Plans if they align with the Vision, Principles and Outcome Areas, and outline specific and measurable targets and have a dedicated budget attached. ANUHD supports Targeted Action Plans provided that they are specific and backed up by enforceable legislation, dedicated budgets, and appropriate administrative and departmental implementation rules.**

Targeted Action Plans also allow independent disability advocacy organisations to call those responsible to account.

ANUHD supports an Engagement Plan that articulates governments' commitment to ensure that people with disability can actively participate in shaping future disability policies, programs and services.

Question 8

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?

Response 8. **ANUHD supports an Engagement Plan that articulates how people with disability can actively participate in shaping future policies, programs and services. Refer to our Response 4: ANUHD supports funding for independent advocacy organisations expressly to monitor the implementation and outcomes of the National Disability Strategy and to report independently to the UN Committee on the Rights of Persons with Disabilities.**

Specific recommendations on housing

Introduction

ANUHD acknowledges that accessibility in housing is only one of four core needs of people with disability. People with disability need housing to be affordable, secure, appropriate and accessible. ANUHD focuses on accessibility in this submission.

People with disability want a home like everyone else

People with disability consider the meaning of home in the same way as other people do. Home is a place of safety, rest and renewal. It is our doorway to community life. It is a place to be truly oneself. Best practice in housing enables people with disability to live, work and play as everyone else does. Everyone, regardless of their level of disability, should be able to decide where, how and with whom they live. Housing for people with disability is everyone's responsibility and should be integral in all mainstream housing strategies.

Everyone benefits from accessibility

Well-designed housing for people with disability is well-designed housing for everyone. The UNCRPD defines "universal design" as *the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. Universal design shall not exclude assistive devices for particular groups of persons with disabilities where this is needed.*

Issues affecting housing for people with disability impact on all the community. People with disability who need housing are ordinary people who have everyday relationships beyond 'carers'; that is, they have partners, children, parents, extended family, and friends, even if they live alone. If a person is marginalised from their network, discriminated against, or isolated by cost, design or location, the people in their network are also impacted.

Many people with chronic illness do not identify as having a disability. The impact of inaccessibility in housing on this expanded cohort should also be considered^d.

The most recent data from the Australian Bureau of Statistics¹¹ finds that just under half (47.3%) of Australians had one or more chronic conditions in 2017-18, an increase from 2007-08 when two-fifths (42.2%) of people had one or more chronic conditions. Chronic health conditions experienced in Australia in 2017-18 that are pertinent here include:

- Back problems - 4.0 million people (16.4%)
- Arthritis - 3.6 million people (15.0%)
- Asthma - 2.7 million people (11.2%)
- Diabetes mellitus- 1.2 million people (4.9%) [Type 1 Diabetes - 144,800 people (0.6%) and Type 2 Diabetes - 998,100 people (4.1%)]
- Heart, stroke, and vascular disease - 1.2 million people (4.8%)
- Osteoporosis - 924,000 people (3.8%)

^d These groups are considered by the World Health Organisation to be at the higher risk of contracting COVID-19

- Chronic obstructive pulmonary disease (COPD) - 598,800 people (2.5%)
- Cancer - 432,400 people (1.8%)
- Kidney disease - 237,800 people (1.0%)

In 2017-18, two thirds (67.0%) of Australian adults were overweight or obese (12.5 million people), a condition that is on the increase not only in numbers but also in severity. There is also a large increase in the incidence of obesity in people aged 18-24 years. It has been established that, for many people, obesity leads to chronic health problems later in life.

Although not all people with obesity or chronic illnesses have core activity limitations, many do—either lifelong or from time to time. This cohort should be included in the quantitative analysis.

There are also other people who would benefit from accessibility in housing, including families with small children, pregnant women, people suffering from injuries, furniture removalists, paramedics, emergency service workers and so on, albeit for shorter and sporadic periods of time.

The costs of short-term disability or injury (people recovering from an accident or an operation) may be lower per person than the costs per person for people with long-term disability, but the number of persons with a short-term disability or injury is far greater. People who incur a short-term disability are unlikely to have cost-efficient arrangements in place for care and support. Also, many of the people with a short-term disability and their short-term informal carers will still be in the prime working stage of their lives and thus will lose more income for each day of physical restriction.

Amendments to the National Construction Code

Since 2002, ANUHD has called for the practical application of universal design through a minimum accessibility standard applicable to all new and extensively modified housing with this standard to be incorporated into the National Construction Code. In our view, the Livable Housing Design Gold Level is the standard that should be mandated by the NCC as the Gold Level is the standard that provides the most efficient and cost-effective outcome of all Australians, including people in wheelchairs. This view was recently substantiated by independent research commissioned by the Melbourne Disability Institute and The Summer Foundation¹² to inform a COAG/Australian Building Codes Board review of proposed changes to the National Construction Code.

Matching accessible housing with the households seeking it.

Even if the NCC adopts minimum accessibility standards it will be a very long time before this regulatory change ensures the availability of accessible dwellings for most people with mobility limitations. Accordingly, the National Disability Strategy should support the provision of services or systems to match existing or newly built accessible housing with the households that are looking for accessible homes. ANUHD supports the use of mainstream platforms with high usage, such as Realestate.com.au or Domain. The research supporting regulation, referenced above, notes that such an initiative will increase the benefit/cost ratio considerably.

Effective and efficient use of home modification funds

Home modifications are changes made for an individual to adapt living spaces to increase usage, safety, security, and independence.

Home modification programs across Australia have historically been of variable quality, have been underfunded, and have not met need¹³⁻¹⁵. Although there is greater assistance from the NDIS for a sub-set of people with disability, there is no evidence that the NDIS has materially alleviated the shortage of accessible housing. Needs are unmet through ineligibility for government funding, by not having access to timely assessment and advice, and by installation and solving problems in a makeshift manner through specific parameters, including the medicalised model of accessibility.

A recent KPMG report¹⁶ on home modifications identifies a lack of a reliable standard and variable expertise of assessors and builders. Further, many people who require major modifications to their homes cannot afford them, and they make do with inadequate housing because they have no alternative¹³.

When the costs associated with assessment, recommendations, reporting on home modifications, and interim alternative arrangements are factored in, home modifications becomes an inefficient, wasteful and inadequate strategy to respond to the poor design of housing at initial construction. In summary, it is good money wasted on a problem that could have been easily fixed in most cases if the dwelling had been well-designed in the first place.

The various government funded home modification assistance strategies (including Department of Veterans' Affairs and Aged Care Program) should be under one quality assurance framework, data collection strategy and research program for optimal use of these funds within the broader housing and human service sectors.

Specific recommendations for a housing strategy

1. **Australia needs a national housing strategy with a principled and long-term vision for equitable and individualised housing assistance, social inclusion, and greater choice and control in the housing options offered to all people including people with disability.**
2. **The concept of universal design as defined in the UNCRPD should be integrated in all targeted action plans for housing in the National Disability Strategy.**
3. **Amendments should be made to the National Construction Code to require at least Gold Level access in all new and extensively modified housing.**
4. **Develop mainstream strategies and generic platforms to match accessible housing with the households that are seeking it.**
5. **There should be national standardisation, quality assurance and data collection of government-funded home modifications to optimise their efficiency and effectiveness within the broader housing and human service sectors.**

Appendix 1. National Dialogue on Universal Housing Design

In late 2009, the former Parliamentary Secretary for Disabilities and Children Services, Bill Shorten, convened the National Dialogue on Universal Housing Design, bringing together representatives from all levels of government, and key stakeholder groups from the ageing, disability and community support sectors and the residential building and property industry.

The members of the National Dialogue were:

- Australian Human Rights Commission
- Australian Institute of Architects
- Australian Local Government Association
- Australian Network for Universal Housing Design
- COTA Australia
- Grocon
- Housing Industry Association
- Lend Lease
- Master Builders Australia
- National People with Disabilities and Carers Council
- office of the Disability Council of NSW
- Property Council of Australia
- Real Estate Institute of Australia
- Stockland

The National Dialogue members recognised at the time that achieving the outcomes set out in this Strategic Plan would rely on the ongoing cooperation and contribution of the members and all levels of government over the next ten years.

Note - the members of the National Dialogue were provided secretariat supported by the then Department of Families, Housing, Community Services and Indigenous Affairs. The then Department of Industry, Innovation, Science and Research and the Australian Building Codes Board have acted as observers to the Dialogue given the discussion around developing guidelines. The then Department of Planning and Community Development and the Building Commission, Victoria have provided technical advice on the guidelines.

For more information go to the [Commonwealth Department of Social Services website](#).

Appendix 2. UN Goals for Sustainable Development

- Goal 1. End poverty in all its forms everywhere
- Goal 2. End hunger, achieve food security and improved nutrition and promote sustainable agriculture
- Goal 3. Ensure healthy lives and promote well-being for all at all ages
- Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all
- Goal 5. Achieve gender equality and empower all women and girls
- Goal 6. Ensure availability and sustainable management of water and sanitation for all
- Goal 7. Ensure access to affordable, reliable, sustainable and modern energy for all
- Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
- Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation
- Goal 10. Reduce inequality within and among countries
- Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable
- Goal 12. Ensure sustainable consumption and production patterns
- Goal 13. Take urgent action to combat climate change and its impacts
- Goal 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development
- Goal 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss
- Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels
- Goal 17. Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development

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