

**Response to the Safe Places Emergency Accommodation
Program – Inclusion Round**

QDN

QUEENSLANDERS WITH DISABILITY NETWORK
NOTHING ABOUT US WITHOUT US

9.03.2023
Department of Social Services

Dear Sir/Madam

We welcome this opportunity to provide a response to the Department of Social Services on the Safe Places Emergency Accommodation Program – Inclusion Round.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michelle Moss', with a horizontal line extending to the right and a small mark at the end.

Michelle Moss
Chief Executive Officer
ceo@qdn.org.au

About Queenslanders with Disability Network (QDN)

QDN is an organisation of, for, and with people with disability. The organisation's motto is "nothing about us without us." QDN operates a state-wide network of members who provide information, feedback and views from a consumer perspective to inform systemic policy feedback to Government and peak bodies. QDN also provides information and referral support to people with disability. This submission is informed by feedback from members. QDN has over 1400 members and supporters across Queensland, and all QDN's voting members are people with disability.

Value Statement on People with Disability

QDN's work in providing feedback and input into systemic policy issues is based upon the organisation's core values and the place of people with disability in an inclusive Australian society.

- All people with disability have a right to a place in the community and have contributions to make to community. This is as empowered, free citizens who are valued, present, participating and welcomed as members of any dynamic and diverse society.
- Culturally and historically, people with disability are not afforded the same value, opportunities or access to community life, and inclusion in community for people with disability has been conditional and vulnerable to withdrawal.
- Many people with disability in Queensland still are excluded from the most basic experiences of ordinary lives.
- Exclusionary practices must be challenged. What affects people with disability affects us all.
- Place is not just about accommodation: core is people with disability are welcomed as ordinary citizens who contribute and actively participate. People with disability need their individuality, talents and lived experiences to be recognised and acknowledged.
- Responsibility to ensure people with disability have a place and belong lies within government (federal, state and local) and the community at large.

Context

More than 4.4 million people in Australia have a disability and 900,000 Queenslanders with disability. This equates to almost one in five Australians. It is broadly acknowledged that people with disability face risks, barriers and impacts in relation to many areas of their lives. This relates not only to their health and disability needs but is also impacted by individual and contextual factors such as age, gender, socio-economic status, family environment, where someone lives, whether they are Aboriginal or Torres Strait Islander and whether they are from culturally and linguistically diverse backgrounds.

It is now well known that compared to women without disability, women with disability experience significantly higher levels of all forms of violence, more intensely and frequently. Their experiences of violence last longer¹; more severe injuries result; women with disability are far less likely to receive service support to address violence; they are often not believed when reporting sexual assault and other forms of violence; they are often denied the right to legal capacity² and effective access to justice³; and they have considerably fewer pathways to safety⁴.

Domestic and family violence (DFV) crisis accommodation in Australia is lacking⁵ and is often not accessible for women with disability⁶ QDN welcomes the Safe Places Program and the creation of more DFV crisis accommodation. It's important that any crisis accommodation is accessible, not just physically accessible, but also accessible for people with intellectual, psychosocial, cognitive and sensory disabilities.

Whilst QDN cannot answer all the questions included in the discussion paper, QDN have responded to pertinent areas of the discussion paper below:

¹ 1Dowse, L., Soldatic, K., Didi, A., Frohmader, C. and van Toorn, G. (2013). Stop the Violence: Addressing Violence Against Women and Girls with Disabilities in Australia. Background Paper. Hobart: Women with Disabilities Australia. Available online at: http://wwda.org.au/wp-content/uploads/2013/12/STV_Background_Paper_FINAL.pdf

² United Nations General Assembly, Human Rights Council (2013) Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Juan E Méndez; 1st February 2013; UN Doc. A/HRC/22/53.

³ Frohmader, C. (2014). 'Gender Blind, Gender Neutral': The effectiveness of the National Disability Strategy in improving the lives of women and girls with disabilities. Prepared for Women With Disabilities Australia (WWDA), Hobart, Tasmania. ISBN: 978-0-9585268-2-1.

⁴ Women with Disabilities Australia (WWDA) (2020). 'Submission to the House Standing Committee on Social Policy and Legal Affairs' inquiry into family, domestic and sexual violence'. August 2020. WWDA: Hobart, Tasmania.

⁵Malone, U. (2021, October 19) NSW government to double the number of refuges for women escaping domestic violence *ABC News* <https://www.abc.net.au/news/2021-10-19/new-refuges-for-women-escaping-domestic-violence/100549520>

⁶ People with Disability Australia (2017). Review to address the impacts of DFV on people with disability. [PWDA review report \(publications.qld.gov.au\)](https://www.pwda.org.au/publications/pwda-review-report)

QDN's Recommendations

In response to the Discussion Paper Introduction

Engagement with Specialist Stakeholders should include disability and DFV services and peaks including Queenslanders with Disability Network (QDN) WWILD Sexual Violence Prevention Service (WWILD), People with Disability Australia (PWDA) and Women with Disability Australia (WWDA). This should also include members and service users/ex-service users of those services and peaks who have had experience with either accessing or being unable to access crisis accommodation (QDN receives feedback that it is a common situation for women with disability to be unable to access crisis accommodation). QDN as the peak body for Queenslanders with disability have a diversity of members who have lived experience of DFV and could also be engaged in consultation. A process of co-design with women with disability is essential. QDN developed, through co-design, a statement of [QDN's Co-design Principles](#)⁷ including helpful indicators of Authentic Voice, Respect, Rights, Resilience and Collective Action. QDN commends these to any organization that wishes to use them.

2.1. Additional support for women and children leaving DFV

Similar to the proposals of short-term crisis accommodation requiring accessibility for women and children with disability experiencing DFV, crisis, transitional housing and longer-term sustainable accommodation such as social and community housing and private rental also needs to consider accessibility. These housing types should offer a platinum standard of accessibility and adhere to the Principles of Universal Design and the 2022 National Construction Code which includes accessibility standards for new builds.

4. Eligibility and Assessment Process

It's important that the people who are making decisions about suitable applicants include people from a diverse range of backgrounds and there is representation of lived experienced and/or experience working in the DFV sector, preferably in the refuge space. This will assist in having the experiences of Aboriginal and Torres Strait Islander women, women with disability, women from Culturally and Linguistically Diverse Backgrounds and LGBTQIA+ women reflected in decision making⁸.

4. 1. Potential Eligibility Criteria

QDN welcomes the broad range of companies, corporations, associations, and co-operatives who are involved in the eligibility criteria alongside local Government and Statutory Entities; however, QDN would need to understand any potential conflicts of interest and accountability measures if having private companies/corporations involved would take accountability away from the government funded projects and services such as this one.

⁷ Queenslanders with Disability Network (2022). *QDN's Codesign Principles* https://qdn.org.au/wp-content/uploads/2022/02/QDN_Co-Design-Principles_FINAL_2022.pdf

⁸ Women with Disabilities Australia (2007). *More than just a ramp*. [MORE THAN JUST A RAMP.indd \(embolden.org.au\)](https://www.morethanjustaramp.org.au/)

4.2. Potential assessment criteria

Some specialist stakeholders that could be considered for Queensland include WWILD, our organisation Queenslanders with Disability Network (QDN) and national peak bodies Women with Disabilities WWDA and PWDA.

4.2.1. Criterion 1: Demand and location

QDN members have often reported being unable to access DFV crisis accommodation at all. Another issue raised by women with disability in urban areas, where there is more likely the option of accessible crisis accommodation, have often been required to move significantly far away, often from supports and services because there is such a lack of accessible options. As women with disability are more likely to experience DFV, the experiences of women with disability should be considered in conjunction with 'priority locations' or areas of 'high need.'

4.3.1 Criterion 2: Specialist services and appropriate support

QDN identifies that an area for consideration in regard to providing short-term accommodation for less than 12 months is that there is limited readily available affordable longer-term accommodation options for women and children who have entered crisis accommodation. The Department of Housing waitlist is extremely long and there is currently a rental affordability crisis, on top of an increased cost of living⁹. This can be even more difficult for women and children with disability who often don't have accessible, affordable exit options. Whilst it's ideal to have crisis accommodation as a short-term solution, DFV crisis accommodation workers also need to be aware of significant barriers that women with disability have to longer-term affordable and accessible housing when considering their length of stay¹⁰.

Solutions to make crisis accommodation more accessible

Accessibility Standards

QDN welcomes the consultation that will happen with women with disability for the Safe Places project and grant proposal. We will also include some considerations to make accommodation more accessible.

It's worth noting that it's crucial to make modifications based on the needs of each woman with disability and implementing the suggestions made by services and women with disability with lived experience of DFV around accessibility is only a starting point.

⁹Dover S. (2023 Jan 11). Calls to retain scheme helping Australian renters amid affordability crisis. *SBS News*.

[Renting across Australia could become less affordable with scheme due to end | SBS News](#)

¹⁰ Smee, B. (2021, June 9). Women fleeing domestic violence 'trapped' in refuges due to lack of housing, advocates say. *The Guardian*. [Women fleeing domestic violence 'trapped' in refuges due to lack of housing, advocates say | Queensland | The Guardian](#)

QDN members have commented in the past that there should be some form of accreditation and regulation where 'access' compliance is signed-off by an independent access consultant to avoid the issues of places and spaces saying they are accessible when they are not. Many members have indicated that being told that somewhere wasn't accessible from the start was less problematic than arriving there to experience that it isn't accessible. QDN members believe that the key to improving accessibility is co-design and including people with disability from the beginning which minimizes the risk of buildings and public spaces not being accessible, and can become expensive to retrofit. QDN members also discussed the need for legal requirements for accessibility standards to be enforced. QDN welcomes the consultation opportunities Safe Places has committed to and suggests co-designed processes moving forwards.

Beyond initial accessibility initiatives

Beyond the building of new crisis accommodation, it is important that the crisis accommodation service itself is accessible on an ongoing basis for women and children with disability.

Every DFV service should use both the Disability (Access to Premises Building) Standards 2010 and the Disability Discrimination Act 1992 (DDA) as Guiding Principles. The DDA outlines that the needs of people with disability need to be considered in regard to "work, accommodation, education, access to premises, clubs and sports and the provision of goods, facilities, services and land."

Developing an action plan which is accompanied by regular audit processes by independent bodies which include people with lived experience and/or work experience of disability and domestic and family violence sectors is an important measure to ensure that crisis accommodation is more accessible and inclusive. These recommendations are included in the 'More than just a ramp: a guide for women's refuges to develop disability discrimination plans' as well as 'Women With Disability and Family Violence: A Guide for Policy and Practice' can assist in setting the precedent for accessibility.^{11 12}

Informational accessibility, physical accessibility and attitudinal accessibility are important to be considered in relation to crisis accommodation¹³. The main barriers experienced by women with disability and identified by WWDA in their paper surround communication, information, attitudes, physical environment, skill of workers and accessing/using a service¹⁴.

Physical accessibility

An important consideration for new crisis accommodation is to have all units and homes accessible as this wouldn't burden women and children without disability. This would also mean having all

¹¹ Women with Disabilities Australia (2007). *More than just a ramp*. [MORE THAN JUST A RAMP.indd \(embolden.org.au\)](#)

¹² People with Disability Australia & Domestic Violence New South Wales (2015). *Women with Disability and Domestic and Family Violence: A Guide for Policy and Practice*. [1.-A-Guide-for-Policy-and-Practice.pdf \(pwd.org.au\)](#)

¹³ People with Disability Australia & Domestic Violence New South Wales (2021). *30 Ways to Make Your Service More Accessible*. [30-Ways-to-Make-Your-Service-More-Accessible.docx \(live.com\)](#)

¹⁴ Women with Disabilities Australia (2007). *More than just a ramp*. [MORE THAN JUST A RAMP.indd \(embolden.org.au\)](#)

units/homes being on the ground floor or have lift access wherever possible as well as well as units with space/rooms for support workers who may need to stay overnight with women/children. Consulting with people with a wide range of physical disabilities when considering physical accessibility is important to creating a service that's as physically accessible as possible as is co-design of crisis accommodation with women with disability who have lived experience of DFV. Often there is only one unit that is accessible for example, this limits the amount of women and children with disability who can access the accommodation. It's also important to have both urban/metropolitan and more rural/regional/remote crisis accommodation that's accessible for women and children with disability. For women with disability it can be critical to be able to be near their informal and paid supports and when they are placed in situations to move far distances away from this puts considerable impact on individuals and families. Often getting transport to crisis accommodation is another major barrier for women and children with disability that services don't always accommodate¹⁵

Some considerations around physical disability include:

- Using Universal Principles of Design as well as the National Construction Code accessibility standards when considering the design of physical spaces
- Adhering to Platinum Standards of accessibility
- Organising accessible transport options for incoming residents and/or advocating with referring services (I.e. domestic violence services, community service and telephone services such as DV Connect) to ensure transport costs are covered
- Clearing walkways of clutter and minimizing clutter in general throughout the premises and accommodation
- Getting rid of tripping and slipping hazards
- Power operated doors
- Having a designated area for items owned by the refuge such as bikes for example, which are stored neatly away from walkways
- Having handrails and adjusted bench tops
- Ensuring that there is enough storage available
- Having any car parks include a disability parking spot and
- Ensuring that there is wheelchair accessibility to all parts of the accommodation, such as wheelchair ramps and elevators
- Using TGS/contrasting colours and/or tactile surface indicators to outline potential hazards.
- Ensuring that light switches, any buttons such as elevator buttons, keypads can be reached easily by women in wheelchairs and or have a disability relating to short stature.
- Having physical markings such as signage in braille
- Having sufficient lighting
- Accessible toilets
- Grass available for dogs/support animals for toileting
- Seating in showers

¹⁵ Women with Disabilities Australia (2007). *More than just a ramp*. [MORE THAN JUST A RAMP.indd \(embolden.org.au\)](#)

- Seating and beds at an appropriate height for women and children with physical disabilities who may use a wheelchair, for example
- Awareness for residents around accommodating for women and children with disability, i.e., assisting with guidance for residents with vision impairment/blindness, cleaning up and putting items away, reducing noise for residents with sensory disabilities
- Simple design of spaces to enable women and children with vision impairment to remember pathways
- Ensuring furniture is not in corridor/walkway areas and accounts for mobility devices
- Ensuring that communal spaces as well as units/homes have minimalist trauma-informed design with trauma-informed colours that have been proven to create calming energy and reduce overstimulation such as greens, blues and purples as well as natural lighting and plants¹⁶
- Any other design measures that reduce overstimulation to accommodate particularly for neurodiversity, such as having neat and tidy communal areas, areas for peace and quiet or relaxation, lighting options to have lights that aren't too bright, not too many lights and colours and noise reduction wherever possible^{17 18 19}

Informational accessibility:

Informational accessibility for women and children with intellectual disability is also an important factor in creating accessible crisis accommodation.²⁰

It's important that any resources published by Safe Places as well as any resources for the crisis accommodation are available in formats such as Easy Read versions, audiovisuals, web content designed for screen readers, audio recordings for information/articles/any text documents, Auslan videos, 'Say Less, Show More' formats for all media files, braille for text and written documents as well as more video and visual formats.

Some Considerations around informal accessibility include:

- Any forms such as intake forms, consent forms, forms that explain complaints and feedback processes, pamphlets, booklets and flyers, having assistance for women to complete forms and children to engage in activities.

¹⁶ National Council for Behavioural Health. [Trauma-Informed-Design-Summary.pdf \(healingattention.org\)](https://healingattention.org/Trauma-Informed-Design-Summary.pdf)

¹⁷ Women with Disabilities Australia (2007). *More than just a ramp*. [MORE THAN JUST A RAMP.indd \(embolden.org.au\)](#)

¹⁸ People with Disability Australia & Domestic Violence New South Wales (2015). *Women with Disability and Domestic and Family Violence: A Guide for Policy and Practice*. [1.-A-Guide-for-Policy-and-Practice.pdf \(pwd.org.au\)](#)

¹⁹ People with Disability Australia & Domestic Violence New South Wales (2021). *30 Ways to Make Your Service More Accessible*. [30-Ways-to-Make-Your-Service-More-Accessible.docx \(live.com\)](#)

²⁰ People with Disability Australia & Domestic Violence New South Wales (2021). *30 Ways to Make Your Service More Accessible*. [30-Ways-to-Make-Your-Service-More-Accessible.docx \(live.com\)](#)

- An accessible website format, such as having content available in the following forms, as well as using plain comprehensible fonts which have the sizing set to at least 12 pt and having the website comply with the Web Content Accessibility Guidelines (WCAG), Easy Read downloads, any physical signage available in Easy Read and braille formats.²¹

Attitudinal accessibility:

Attitudinal barriers are also important to consider for the viability of safe places crisis accommodation.²²

Some considerations around attitudinal accessibility include:

- Referrals to the crisis accommodation not being knocked back due to disability status and a culture of making modifications where required for incoming residents.
- Having Disability Action Plans and a review process for these plans.
- Having staff who have either had experience in the disability as well as DFV sector or ensuring staff undergo training in disability awareness, disability-specific practice approaches, services, intersectionality and accessibility delivered by disability services, preferably disability and DFV services (PWDA is a body that offers this type of training).
- Staff having strong connections with disability, DFV and housing services to be able to advocate for women and children with disability.
- Using Guidelines and frameworks for practice such as the DDA, UNCRPD and the social model of disability.
- Having audits completed by independent disability services and done by female auditors with disability with lived experience of DFV and/or experience working in these sectors.
- Staff having awareness about accessible formats of information, close captioning, assistive technologies as well as how to guide women and children with vision/hearing disabilities.
- Women with disability being in governing bodies such as boards of the organisation, for example as well as recruiting women with disability into positions wherever possible.²³

Recommended Resources

QDN recommends using the following resources to guide the development of any new crisis accommodation for women and children fleeing domestic and family violence:

²¹ People with Disability Australia & Domestic Violence New South Wales (2021). 30 Ways to Make Your Service More Accessible. [30-Ways-to-Make-Your-Service-More-Accessible.docx \(live.com\)](#)

²² People with Disability Australia & Domestic Violence New South Wales (2021). 30 Ways to Make Your Service More Accessible. [30-Ways-to-Make-Your-Service-More-Accessible.docx \(live.com\)](#)

²³ People with Disability Australia & Domestic Violence New South Wales (2021). 30 Ways to Make Your Service More Accessible. [30-Ways-to-Make-Your-Service-More-Accessible.docx \(live.com\)](#)

- People with Disability Australia & Domestic Violence New South Wales (2021). 30 Ways to Make Your Service More Accessible. [30-Ways-to-Make-Your-Service-More-Accessible.docx \(live.com\)](#)
- Women with Disabilities Australia (2007). *More than just a ramp*. [MORE THAN JUST A RAMP.indd \(embolden.org.au\)](#)
- People with Disability Australia & Domestic Violence New South Wales (2021). Women with Disability and Domestic and Family Violence: A Guide for Policy and Practice. [Women with Disability and Domestic and Family Violence A Guide for Policy and Practice \(pwd.org.au\)](#)
- People with Disability Australia & Domestic Violence New South Wales (2015). Women with Disability and Domestic and Family Violence: A Guide for Policy and Practice. [1.-A-Guide-for-Policy-and-Practice.pdf \(pwd.org.au\)](#)
- New South Wales Government (2022). Domestic Violence Crisis Accommodation Functional Design Brief. [Domestic Violence Crisis Accommodation Functional Design Brief \(nsw.gov.au\)](#)
- Queenslanders with Disability Network (2022). *QDN's Codesign Principles* https://qdn.org.au/wp-content/uploads/2022/02/QDN_Co-Design-Principles_FINAL_2022.pdf
- National Council for Behavioural Health. [Trauma-Informed-Design-Summary.pdf \(healingattention.org\)](#)
- Washington State Coalition Against Domestic Violence (2009). Accessibility, Ramps, ADA Bathrooms and a Whole Lot More! [Accessibility at WSCADV Trainings](#)