

**NATIONAL DISABILITY STRATEGY 2010-2020
LAYING THE GROUNDWORK (2011-2014)**

FEEDBACK FROM PEOPLE WITH DISABILITIES (WA) INC.

People with Disabilities (WA) Inc. would like to thank you for the opportunity to comment on the draft of the "National Disability Strategy: Laying the Groundwork Implementation Plan (2011-14)".

People with Disabilities (WA) Inc. is a peak disability organisation providing individual and systemic advocacy, and information services, across Western Australia.

The feedback presented in this document is a response to the 13 December 2011 draft of the "Laying the Groundwork Implementation Plan (2011-2014)" distributed by FaHCSIA to peak bodies with a Feedback Form containing 13 targeted questions. We have based our feedback around these targeted questions.

Chapter 1: Our Blueprint for Action: a comprehensive approach to addressing disability (pp 5 - 8)

This section of the draft plan is to provide to the broad context for disability reform including reform of specialist disability services as well as driving government activity across non-disability specific areas of policy and support. The intention is to link the implementation plan and evaluation framework to the Strategy without repeating large parts of the Strategy.

1. Does this section provide sufficient overview of the Strategy and its aims?

Question 1 Feedback:

We acknowledge that this is a draft and the final formatting will make the headings and subheadings clearer for a lot of readers. I use a text-to-speech application named TextHelp Read&Write Gold to read documents. I found that there were a lot of bullet pointed lists in Chapter 1, including references to 4 aims, 6 outcomes, a list of policy directions, 53 areas of future action, 3 implementation plans and 6 key elements.

Recommendations:

1. To avoid repetition of the National Disability Strategy, the reader could be advised to read this Implementation Plan in conjunction with the Strategy and directed to sections of the Strategy at relevant points in the Plan.
2. To avoid confusion, Chapter 1 could include the following sections:
 - a. aims;
 - b. key elements;
 - c. phases of the 10 year strategy.

(The introduction of the objectives, policy directions and areas for future action could then be left to Chapter 2.)

3. Under the key elements in Chapter 1, the subtitle 'Embedding the Voice of People with Disability' could be re-worded to recognise the key principles of self-determination and diversity. Suggested wording: Empowering the voices of people with disabilities. This section could also be best placed at the 'top of the list' of key elements.
4. The content of this section (or Chapter 3: Governance) could be expanded to include more information on how individuals and communities will be involved in the Strategy's development, implementation, monitoring and evaluation.
5. The section on 'State and Territory Government Disability Plans' could be put in an accessible table with web links to the relevant documents / government websites.

Implementation Phases of the 10 Year Strategy

The Strategy is a long term policy framework. The suggested approach is to break the implementation into three phases:

- Laying the Groundwork (2011-2014)
- Driving Action (2015-2018)
- Reporting on Results (2019-20).

While activities identified for direct action in this first plan are being implemented, further work will take place to determine policy and program priorities for action in the following two plans, namely 2015-2018 and 2019-2020.

This approach allows for actions to be implemented and for their impact to be monitored and assessed on a regular basis. The time periods align with the two yearly reports on the national trend indicators to COAG.

2. Does the approach of phased implementation plans, which allow for periods of review and consolidation, make sense?

3. Do the working titles of the three implementation plans provide enough guidance on the different phases of work?

4. Is it clear how the evaluation plan and monitoring reports fit in with the three implementation phases?

Questions 2, 3 & 4 Feedback:

Reference to three implementation plans could confuse the intended audience, especially when the second and third plans refer to action and results. The current working titles may falsely imply that communities will need to wait till 2015 to see any action.

Recommendation:

The three plans / phases could be referred to as Action Plans or Priority Area Plans 1, 2 and 3. Each of these phases would have its own set of actions and reporting of results, with an overall evaluation of the Strategy scheduled for 2020.

- Action Plan 1 (2011-13)
- Action Plan 2 (2014-16)
- Action Plan 3 (2017-19)
- Evaluation (2020)

Chapter 2: Implementation Plan (2011-2014) – Laying the Groundwork (pp 9-54)

The primary objective of the first implementation plan is to lay the groundwork for actions that will create an improved response across all mainstream policies, programs, services and infrastructure so that people with disability, their families and carers can access and participate in all aspects of community life.

The implementation plan has six key elements that will drive the Strategy's policy outcomes and directions:

- i. influencing the mainstream support system through the periodic reviews of COAG national agreements and partnerships – with the inclusion of specific strategies and performance indicators to address outcomes for people with disability as appropriate
- ii. focus on outcomes for people with disability through the appointment of Disability Champion Ministers
- iii. alignment of state and territory government disability plans with the Strategy
- iv. embedding the voice of people with disability by all government agencies in the development and implementation of policies and programs, not just disability specific policies and programs
- v. developing new approaches to collecting disability data across all community service systems to help report on outcomes for people with disability
- vi. embedding change through areas of national cooperation.

5. Is it clear how each of the approaches above will improve responses to people with disability? If not how can they be strengthened?

Question 5 Feedback:

The draft could be criticised as not fully recognising the role of people with disabilities in the development, implementation, monitoring and evaluation of the Strategy. The structure and wording used throughout the draft appears to place greater emphasis on the roles of governments and disability champion ministers than people with disabilities. On Page 55 of the draft, the wording cited under the heading "Stakeholder engagement on Laying the Groundwork 2011-2014" infers that it is an 'obligation' for the Government to consult with people with disabilities, and fails to emphasise the independent voice of a person with disability (see below).

"Governments are **required** to work collaboratively with people with disability and their representative organisations, their families and carers, communities, unions, businesses, service providers, advocacy and other organisations in the development of programs, policies and systems that affect people with disability."

Recommendations:

Alternative wording could be used to recognise the principle of self-determination. For example, the sentence "The community sector and individuals also have a role in advancing and promoting the Strategy using their networks and organisations." (p. 55) could be reworded to read "The community sector and individuals will have a key role in the continued development, implementation, monitoring and evaluation of the Strategy".

6. Does the section on National Areas of Co-operation provide sufficient detail of the actions to be undertaken in the first implementation plan?

7. Do you believe the actions for 2011-2014 will help to lay the groundwork for improving awareness and understanding of the needs of people with disability, their carers and families, within the broader community?

Questions 6 & 7 Feedback:

Several of the actions listed were fairly vague and did not provide the reader with a clear description, timeline for implementation and reference to performance indicators that would be in place to monitor whether the action was meeting the objectives of the Strategy.

For example:

- Under "Area for future action 1.2" there are no clear actions cited to "Support the development of strong social networks for people with disability". The draft merely refers the reader back to "Area for future action 1.1".

Recommendations:

All areas for future action should include at least one paragraph of information.

The subheading "Areas for future action" is a little confusing as some of these actions are already current. It may be beneficial to list under each action 'Current Strategies', 'Future Actions', 'Performance Indicators' and 'Timeframe'.

Furthermore, under "Area for future action 1.6" the words "Universal design is broader than housing" could be removed as this could be seen as stating the obvious. Maybe a brief definition of universal design could be included in the Plan or the reader could be directed to the definition of universal design provided in the Strategy.

Please refer to Pages 34-40 of the 'Australia's National Human Rights Action Plan - Exposure Draft'. This Exposure Draft includes a set of actions to support the outcomes of the Strategy with performance indicators and timelines and provides a good example of how the Actions for 2011-14 could be set out using a table format in the Plan. See web link <http://www.ag.gov.au/nhrap>.

Chapter 3: Governance: (p55-56)

8. Do you have any comments or questions on this section?

Question 8 Feedback:

Please refer to the feedback and recommendations provided under Questions 1 and 5.

Chapter 4: Monitoring, Evaluation and Reporting (pp57-62)

The draft plan also includes a high-level framework summarising how the Strategy will be evaluated. The evaluation plan aims to assess the effectiveness of the Strategy and to monitor key policies, programs and initiatives that fall under the Strategy.

The section on evaluation outlines an ongoing module that uses the two yearly progress reports on trend indicators and achievements, reports from Disability Champions, feedback from stakeholders, summaries of program evaluations to periodically assess the impact of the Strategy. These progress reports will link to Australia's commitments to report to the United Nations, and be used in the final evaluation in 2021.

9. Is the approach to evaluation clear and logical? Do you think it will provide an accurate picture of the effectiveness of the Strategy?

Question 9 Feedback:

The table presented in Chapter 4 (p. 62) could confuse some readers, where the gridlines, word count and small font size make the contents of the table difficult to read.

Recommendation:

The table could be simplified using fewer words, and unnecessary gridlines removed.

10. The findings of evaluations of Strategy-related programs and policies will be drawn into the broader evaluation of the Strategy to strengthen the evidence base. Are there any current or future program or policy evaluations that the Strategy evaluation might draw upon?

Question 10 Feedback:

It is important to recognise that there are Government initiatives that may fall outside Federal or State Government Disability Plans. For example in Western Australia, the Economic Audit Committee's Self Directed Service Design policy relates well to "Outcome 4" and "Area for future action 4.3", though it is not governed by the WA Disability Services Commission (DSC), nor part of the 2009 DSC's "Count Me In: Disability Future Directions".

Outcome 4: Personal and Community Support - People with disability, their families and carers have access to a range of supports to assist them to live independently and actively engage in their communities.

Area for future action 4.3: Adopt sustainable funding models and service approaches that give information, choice and control to people with disability and that are flexible, innovative and effective.

Supporting "Outcome 4" and "Area for future action 4.6" of the Strategy, the broad outcomes expected from the implementation of the Economic Audit Committee's recommendations include:

- Service delivery which is more effective and responsive to citizen needs.
- Constructive debate in the public sector and in the community as to the understanding of and merits of self-directed service design.
- Extensive discussion in the public sector and in the community as to the application of self-directed service design to different areas of policy and service delivery.
- The introduction of alternative approaches to service delivery.
- Financially viable service models for service delivery agencies.

For further information, see web link

<http://www.dpc.wa.gov.au/Publications/EconomicAuditReport/Pages/SelfDirectedServiceDesign.aspx>.

Draft Trend Indicators

Reporting on trend indicators will be an important part of tracking progress to ensure that outcomes for people with disability round the country are improving. A set of draft trend indicators based on the six policy outcome areas were included in the Strategy.

Governments have been working to specify how the trend indicators will best be measured, noting improvements in the availability and structure of national population-based data sources.

The trend indicator data needs to reflect areas that really matter in improving outcomes for people with disability. The current set of trend indicators have been selected as they relate to the policy outcomes, can be measured from robust national data that is currently available on a regular basis and that can be broken down into disability status. They do not rely on having to develop new ways of collecting information. With this in mind:

11. Are there any other priority data areas for trend indicators that would measure progress for people with disability at a national level? If so, please identify the national data sources in which this information can be found.

Question 11 Feedback:

Progress should be measured using a good balance of qualitative and quantitative data; including data from publically available feedback forms on the Strategy outcomes and transcripts from community based forums.

The data should also take into account different outcomes for people from different backgrounds, and rural or remote areas of Australia.

Design and Structure of the Plan:

12. Noting that the plan is still to be edited professionally, is the design and structure of the report easy to read and follow?

Question 12 Feedback:

When using colour coding, headings and subheadings, care should be taken to check how the document will be understood by someone using a screen reader or text-to-speech software. It is good that the headings and subheadings in the Implementation Plan have been clearly worded.

The plan could be reviewed prior to publication using a screen reader and/or text-to-speech application and checked using the Microsoft 2010 Accessibility Checker. See web link

<http://office2010.microsoft.com/en-us/starter-help/accessibility-checker-HA010369192.aspx>

Numbered bullet points could help the reader identify the 6 outcomes when they are first mentioned in the draft on Pages 5 and 6.

Clearer signposting could help the reader understand how the outcomes, policy directions and actions relate to each other. For example, under Outcome 1 the following sentence could be included:

“Under Outcome 1, there are five policy directions and nine areas for future action.”

General Feedback:

13. List any other comments, thoughts or ideas about the plan or ideas that could be carried forward for the next implementation period.

Question 13 - Further Recommendations

Definition of disability

For national agreements and partnerships to be effective it will be necessary for governments to acknowledge their responsibilities under the Federal Disability Discrimination Act 1992 (DDA).

In Western Australia, the WA Disability Services Act 1993 includes a definition of disability that does not acknowledge the rights and needs of people with non-permanent disabilities. In contrast, the Federal Disability Discrimination Act 1992, referred to in the National Disability Strategy, provides a broad and more inclusive definition that aims to ensure that everyone with a disability is protected, including people with non-permanent disabilities. The WA State Premier, Hon Colin Barnett, has signed the National Disability Strategy but has he fully acknowledged the WA State Government's responsibility to people with non-permanent disabilities and other disabilities that are not covered by the WA Disability Services Act 1993?

What strategies are in place to ensure that the 6 outcomes will cover 'all' persons with disabilities, including people who have previously been ineligible for state-based services?

Note that the full definition of disability cited in the DDA is not included in the Strategy.

Recommendation:

Chapter 1 of the Plan could include the full definition of disability as cited in the DDA. This is likely to assist governments in understanding their responsibilities to all people with disabilities, and is also likely to assist people with disabilities, their families and carers in understanding their rights under the DDA. See the following web link for the full definition of disability cited in the DDA.

http://www.austlii.edu.au/au/legis/cth/consol_act/dda1992264/s4.html#disability.

National Disability Insurance / Injury Schemes

The objects and aims of the National Disability Insurance / Injury schemes could be made clearer in the Plan with a brief statement referring to the outcomes of the Productivity Commission's Inquiry Report, government support of the schemes, and current timelines for implementation. For further information, see <http://www.ndis.gov.au/>.

National Disability Coordination Officer Program (NDCO program)

Under Outcome 5 there was no reference to the Department of Education, Employment and Workplace Relations' National Disability Coordination Officer Program.

Outcome 5: Learning and skills - People with disability achieve their full potential through their participation in an inclusive high quality education system that is responsive to their needs. People with disability have opportunities to continue learning throughout their lives.

We are aware that the NDCO program is an established program, though it may be worth mentioning in the Plan as the continuation of this program relates well to achieving Outcome 5.

The goals of the NDCO program are to:

- **Improve transitions** to help people with disability move from school or the community into post-school education and training and subsequent employment.
- **Increase participation** by people with disability in higher education, vocational education and training and employment.
- **Establish better links** between schools, universities, TAFEs, training providers and disability service providers so that they can work together to provide the best possible assistance for people with disability.

For further information, see web link

<http://www.deewr.gov.au/Skills/Programs/Support/NDCO/Pages/default.aspx>

If you require further information or clarification of any points addressed in this Feedback Form, please contact Amber at People with Disabilities (WA) Inc.

Dr Amber Arazi

Consultant: People with Disabilities WA Inc.

Oasis Lotteries House

1/37 Hampden Road Nedlands WA 6009

Ph: (08) 9485 8900 / Fax: (08) 9386 1011

Email: amber@pwdwa.org

Website: www.pwdwa.org