Australia's Disability Strategy 2021 – 2031 Review Discussion Paper

September 2024

SSi

For equality of life.

Table of contents

Acknowledgement of Country

SSI acknowledges the Aboriginal and Torres Strait Islander peoples as the First Australians and Traditional Custodians of the lands where we live, learn and work. We pay respect to Elders past and present and recognise their continuous connection to Country.

Background

SSI welcomes the opportunity to provide this submission to the Australian Government Department of Social Security (the Department) on its Discussion Paper for its Review of Australia's Disability Strategy 2021 – 2031 (the ADS).

SSI is a national non-for-profit organisation that delivers a range of human services that connect individuals, families, and children from diverse backgrounds with opportunities – including settlement support, disability programs, community engagement initiatives and training and employment pathways. At the heart of everything we do is a drive for equality, empathy, and celebration of every individual.

SSI was founded in Sydney in 2000 with the aim of helping newly arrived refugees settle in Australia. Over time, our expertise in working with people from diverse cultural and linguistic (CALD) backgrounds served as the foundation for a gradual expansion into other social services and geographical areas.

In 2018, SSI merged with Queensland-based Access Community Services, and in 2019 opened in Victoria, providing an extensive footprint across the eastern coast of Australia. In FY2023, SSI supported over 56,000 clients across more than 59 programs and community-based services. We are also a leading provider of evidence-based insights into the social sector and are known as an organisation that can reach communities considered by many to be 'hard to reach'.

SSI is well placed to provide input on the Department's review of the ADS. This submission draws from SSI's experience of working with people with disability to support their health and wellbeing, economic participation and social inclusion so that they determine and reach their full potential by:

- Partnering with the National Disability Insurance Scheme (NDIS) to deliver Local Area Coordination (LAC) across two areas of greater Sydney in New South Wales, which also include the largest proportion of people from CALD backgrounds;

- Providing the Australian Government's employment service, Disability Employment Services (DES), in NSW;

- Working with people with disability alongside industry and sector leaders, government officials, and disability and employment experts, to host the Pathways to Possibilities Symposium. The Symposium's focus was on Disability Employment;

- Addressing barriers to entrepreneurship for newcomers to Australia and people with disability through the Ignite® social enterprise since 2013;

- Applying a community engagement and co-design approach to building self advocacy capability of people with disability through The Rights Path Project, funded by the NDIS Quality and Safeguards Commission;

- Our *Foundations for Belonging* research in partnership with Western Sydney University's Institute for Culture and Society.[i] This research shines a light on refugees' perspectives of settlement, integration and belonging. The fifth phase of this research currently underway, focuses on refugees with disability and includes as an additional partner, the National Ethnic Disability Alliance (NEDA). This research will make a significant contribution to understanding intersecting dimensions of disability, considering that a recent audit of disability research conducted in Australia from 2018-2020 found that less than 3 per cent of research related to the experiences of migrants and refugees.[ii]

SSI's response to specific Key Questions of the Discussion Paper include comments on how the ADS can be improved.

We look forward to working collaboratively with the Department's review of the ADS.

Summary of SSI Recommendations

Recommendation 1: SSI strongly supports more accessible information and communications (Draft Finding 3 / Draft Recommendation 3). In particular, such information and communications should be co-designed by and accessible to people with disability from culturally and linguistically diverse backgrounds and government should establish and maintain a repository of such resources.

Recommendation 2: SSI supports ways to improve ADS reporting (Draft Finding 4 / Draft Recommendation 4) and in particular, making more visible intersectional experiences, including for people with disability from culturally and linguistically diverse backgrounds, lesbian, gay, bisexual, transexual, intersex, queer/questioning, and asexual (LGBTQIA+) people with disability and people with psychosocial disability.

Recommendation 3: SSI strongly supports strengthening the involvement of people with disability (Draft Finding 5/Recommendation 5) and the intent to strengthen community engagement.

Recommendation 4: SSI recommends that economic and financial security (Outcome Area 1) include direct reference to Self employment barriers and opportunities and Self management of finances.

Implementation Mechanisms

While the ADS outlines national disability policy for governments across all jurisdictions, in SSI's experience there is considerable change fatigue in the disability community, particularly with respect to successive governments' changes to the National Disability Insurance Scheme (NDIS). The pace, sporadic and contested nature of changes to the NDIS has been experienced as disruptive and dispiriting to many participants that SSI works with. In internal SSI consultations to develop this submission, this situation is attributed to limited government engagement and genuine co-design with people with disability. There are concerns of what is seen as continual 'changing the goalposts' of the NDIS coinciding with an overall shift away from the NDIS's original, human rights-based intent.

Overall, SSI agrees with the direction and intent of the Draft Findings and Draft Recommendations in the Discussion Paper and provides the following input to improve the implementation of specific Draft Findings and Draft Recommendations.

Draft Finding 1 / Draft Recommendation 1: Nationally coordinated approach to governments' ADS implementation

The Discussion Paper envisages improving national coordination by limiting the number of ADS Targeted Action Plans (TAP) for each government jurisdiction. However, the national coordination that the Discussion Paper recommends should include action at a system design level beyond TAPs. The ADS Summary recognises that "more than one level of government has some responsibility for a support or service system."[iii] The Discussion Paper also points out that, "however, in most cases one level of government has primary responsibility for delivery of a system";[iv] which means that opportunities to improve coordination should be implemented as detailed in Draft Finding 1 and Draft Recommendation 1.

The benefits to people with disability will be realised when such coordination occurs across specialised disability services and mainstream services. For example, research commissioned by the Disability Royal Commission found that people with disabilities from culturally and linguistically diverse backgrounds encounter systemic barriers in both mainstream service systems *and* in specialist disability services.[v] In SSI's experience, in addition to the core principle of co-design with people with disability, improved implementation of the ADS could include opportunities to better:

- Embed the guiding principles of the ADS in practice in the design and operation of the systems that people with disability engage with;

- Align all components and levels of the systems, in a way that reduces complexity;

- Work in collaboration with place-based, local initiatives driven by the voices of people with disability to more meaningfully truly and effectively engage with communities.

- Focus on the objective to provide more person-centred experiences that is more responsive to the dreams and aspirations of people with disability.

Draft Finding 3 / Draft Recommendation 3: Accessible information and communications

> ***SSI Recommendation 1:***
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> *SSI strongly supports more accessible information and communications (Draft Finding 3 / Draft Recommendation 3). In particular, such information and communications should be co-designed by and accessible to people with disability from culturally and linguistically diverse backgrounds and government should establish and maintain a repository of such resources.*

Accessible information and communications is essential to engage with and ensure that people with disability can achieve their aspirations and access the supports they need. However, there is evidence of gaps in access to the NDIS which indicate deficiencies in accessible information and communication for people with a disability from culturally and linguistically diverse (CALD) backgrounds. The uptake of the NDIS by people from CALD backgrounds continues to be much lower than the rest of the Australian population, despite having similar rates of profound or severe disability.[vi] The National Disability Insurance Agency (NDIA) projected that by 2019, around 20% of NDIS participants would be from CALD backgrounds;[vii] however, in June 2024, the proportion of CALD participants entering and receiving an NDIS plan was only 9 per cent.[viii] The NDIA's response has been to release its second Cultural and Linguistic Diversity Strategy 2024-2028[ix] with a corresponding Action Plan.[x] The ADS should ensure stronger action to ensure information and communications that are co-designed by and accessible to people with disability from CALD backgrounds.

Equally important, is for government to establish and maintain a repository for accessible information/communication resources. While many organisations develop their own resources, their dissemination and therefore impact in supporting people with disability can be limited. Providing such a repository (such as in the Disability Gateway), can reduce duplication by services and agencies alike while having greater impact. SSI's recommendation should also be reflected in the development of a National Plan for Accessible Information and Communications as an Associated Plan under the ADS that was discussed by the Disability Reform Ministerial Council in August.[xi]

Draft Finding 4 / Draft Recommendation 4: ADS Reporting

> ***SSI Recommendation 2:***
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> *SSI supports ways to improve ADS reporting (Draft Finding 4 / Draft Recommendation 4) and in particular, making more visible intersectional experiences, including for people with disability from culturally and linguistically diverse backgrounds; lesbian, gay, bisexual, transexual, intersex, queer/questioning, and asexual (LGBTQIA+) people with disability and people with psychosocial disability.*

SSI acknowledges that the ADS includes a wide range of reporting on the progress of Outcome Areas and uses a traffic light dashboard to make this reporting available.

SSI suggests that an additional area for improvement could be for a stronger focus on developing and reporting on indicators to improve visibility of intersectional experiences including for people with disability from culturally and linguistically diverse backgrounds (CALD); lesbian, gay bisexual, transexual, intersex, queer/questioning, and asexual (LGBTQIA+) people with disability; and people with psychosocial disability. Better ADS data and reporting on intersectional experiences would make gaps more visible and guide investment towards these areas. For example, of the almost 20,000 people with disability that SSI work with delivering Local Areal Coordination to access the NDIS in partnership with the NDIA, almost a quarter (24%) are from CALD backgrounds and almost 1 in 10 (7%) have psychosocial disability.

Draft Finding 5 / Draft Recommendation 5: Genuine involvement of people with disability

SSI Recommendation 3:

SSI strongly supports strengthening the involvement of people with disability (Draft Finding 5/Recommendation 5) and the intent to strengthen community engagement.

Community engagement is a cross-cutting issue with particular relevance to Draft Recommendations 3-5 of the Discussion Paper and SSI sees value in the proposed renewed focus through the development of an ADS Community Engagement Plan.

SSI's The Rights Path (TRPP) Project is engaging directly with culturally and linguistically diverse (CALD) people with disability across NSW, Queensland and Victoria to consult, co-design, test and disseminate relevant and accessible in-language resources. To date, the project has engaged with 18 Lived Experience Consultants in online and face-to-face consultation workshops across NSW, QLD, and VIC. These consultations reviewed the experiences of NDIS participants, their family members, and carers from the Khmer, Punjabi, Urdu, and Vietnamese-speaking communities.

Outcome Areas and Policy Priorities

SSI's response focuses on Outcome Area 1.

Outcome Area 1. Economic & financial security

SSI Recommendation 4:

SSI recommends that economic and financial security (Outcome Area 1) include direct reference to Self employment barriers and opportunities and Self management of finances.

While Outcome Area 1's (Economic & financial security) policy priorities include transition from education to employment and employment barriers, self employment and self management should also be addressed.

Research led by the University of Technology Sydney (UTS), *Entrepreneurs with Disability in Australia*, in partnership with National Disability Services, SSI and Break-Thru People Solutions, found that people with disability have a much higher rate of self-employment or entrepreneurship (13.1%) compared to people without disability in Australia (9.2%).[xii] On average, people with disability are 43% more likely to be self-employed than non-disabled Australians, and this finding is found in similar overseas studies.

To address this demand, in 2013, SSI established the Ignite® social enterprise to address barriers to entrepreneurship for newcomers to Australia and people with disability.

IgniteAbility® is a program specifically designed to provide an educational workshop as a stepping stone into a self-employment pathway. Ignite Female Founders is a program designed to support women with barriers into mainstream support for entrepreneurship and includes women with disability, among other female cohorts.

The UTS research found that the strength of the SSI's IgniteAbility® program is that it takes each individual on their own bespoke journey to establishing a business.[xiii] A key feature of the IgniteAbility® program has been the diversity of clients and their businesses.[xiv] This work demonstrates that making self employment pathways available for people with disability should be identified as a policy priority at the national ADS level.

Beyond direct service delivery, SSI is addressing barriers to employment by adopting a cross sector, collaborative approach with people with disability to develop strategies and solutions. In early 2024, SSI convened a Pathway to Possibilities Symposium. This Symposium brought together over 150 people with disabilities, the employment and disability sectors to share and reflect on practice and identify areas to improve people with disability's economic participation and develop insights into actionable strategies. People with disability were among session facilitators who lead discussion centred on the voices of those with lived experience. SSI is in the process of publishing an outcomes report that translates these insights, data, and real-life stories into tangible actions that can drive change in our workplaces and communities. SSI will launch a Community of Practice which will be co-designed and facilitated by people with disability. This work demonstrates how collaboration can be extended between and across sectors and people with disability to develop positive outcomes.

Fundamental to economic and financial security, is raising awareness, building capability and providing the opportunity of people with disability to self manage one's finances, should they wish to do so. Co-design of such measures is critical to ensuring that such measures are disability responsive for example, for people with intellectual disability. Co-design should also involve networks, informal or otherwise, of those who support people with disability such carers, or nominated representatives. The ADS accordingly should identify self management of finances as a Policy Priority that requires government action.

Authorised by: Ben Fioramonte, General Manager, Children, Families and Disability Support

Contact: Tri Nguyen, Social Policy Lead

> tringuyen@ssi.org.au

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[xiv] Ibid.