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Australia's Disability Strategy (ADS) Branch: ADS Review
Department of Social Services
GPO Box 9820
CANBERRA ACT 2601

4th September 2024

Delivered by email to ADSReview@dss.gov.au

Dear ADS Review Team

Review of Australia's Disability Strategy 2021- 2031

Family Advocacy welcomes the opportunity to provide this submission in response to the review of Australia's Disability Strategy 2021-2031 ('ADS'). We are a not for profit disability advocacy organisation that works across New South Wales (NSW) to advance and protect the rights and interests of people with developmental disability. We have been providing individual and systemic advocacy, and family advocacy development for over 30 years.

As an organisation that took part in the consultations that developed the ADS, we broadly agree with the Strategy's seven Outcomes Areas and corresponding Policy Priorities for each Outcome Area. Family Advocacy has endorsed the submission made by **People with Disability Australia**. Further to the concerns and suggestions raised in this submission, Family Advocacy wishes to make the following points in relation to Education and Employment.

Before we do, we wish to raise we feel rushed in preparing a submission for this consultation. advocacy organisations such as ours who are already experiencing "capacity crunch" given the swathe of policy reform in the sector, require adequate time to consult with our network of families, compile their responses and relay them back. A much more considered timeframe is needed for genuine consultation and co-design.

To provide us with a 4-week window to respond, the week after DRC government response, the NDIS Amendments Bill requiring attention is an extremely unreasonable timeframe to respond. We have done our best with these time restrictions but have not had adequate time to consult with our cohort of families as we would like to.

Education, intersectionality and data improvement

We support Draft Finding 1: More needs to be done to support a coordinated approach to ADS implementation across governments. As the Discussion paper notes "The success of the ADS relies on governments working together" and this was echoed by the Disability Royal Commission.

We also support Draft Finding 4: ADS reporting does not support government accountability, implementation compliance, or recognising intersectional experiences of people with disability. The ADS has committed to an intersectional lens when implementing actions to deliver on Policy Priorities (p.36). The Disability Royal Commission agrees ADS data should include intersectional cohorts.

A recent example in education illustrates why both of these findings are important. As a member of

the Australian Coalition of Inclusive Education, we recently had cause to express our dissatisfaction to both NSW and Federal Education Ministers at the recent policy decision in the Better and Fairer Agreement 2025-2034 which omitted students with disability from their Improvement measures for Year 12 attainment and attendance. Other cohorts such as students with disability, low socioeconomic backgrounds and rural and remote areas were included as an equity cohort. It is precisely this type of intersectionality the ADS has committed to addressing. Data is needed to ascertain this the ADS Education Outcomes

We met with the Federal Department of Education and the reason provided for the omission of students with disability was because there was not enough data. It appears the States/Territories are reticent to hand over any data. This is extremely frustrating for advocacy organisations such as ours and others who are part of the Australian Coalition for Inclusive Education as this conversation about the lack of data that has been going back and forth between State and Federal governments for decades. It is no longer acceptable to use this as a reason to not improve things for a student with disability. The justification is cyclical without merit. While students with disability are not a focus for the 10-year Improvement Measures such as for Year 12 attainment and attendance, there will be no motivation to put processes in place to change this apparent data drought, leaving students with disability another decade behind.

Recommendation – Extend the ADS data and reporting to improve visibility of intersectional experiences. Embed mechanisms that will support the early identification of delayed and undelivered TAPs actions.

Recommendation - The decision to exclude students with disability in the Improvement Measures in the Better and Fairer Agreement 2025-2034, particularly in Year 12 attainment and attendance, be reversed.

Outcome Area: Education and learning

Discussion questions: - Do you agree that inclusive education should be a priority for future work under ADS? - How should ADS take action towards achieving inclusive education? - In what other ways could we improve this Outcome Area?

We agree that inclusive education should be a priority for future work under ADS.

Special schools and support units are on the rise in NSW and our calls from families continue to grow about gatekeeping, lack of reasonable adjustments to access physical/social/curriculum, suspensions/expulsions due to lack of reasonable adjustments.

Advocacy wrote this [Position Statement on Inclusive Education](#) which was endorsed by twelve NSW disability advocacy organisations, and sent to the Minister for Education and Early Learning, and invite the Parliamentary Education Committee to call on the NSW government to endorse it in full.

There was full consensus where all six Commissioners all Disability Royal Commissioners agreed that the status quo can no longer be tolerated, stating that:

“A safe, quality and inclusive education can only be delivered through significant transformation of the school system. In Part A, ‘Inclusive Education’ we recommend legislative and policy changes, improved procedures and support services, and changes to culture, capability and practice ‘on the ground’. We recommend that these changes are embedded in school practices through enhanced workforce training and support, improved data collection and use, stronger oversight, and greater accountability. Reform at the scale we are proposing requires careful prioritisation and a coordinated approach.”

Further to these DRC recommendations to improve mainstream education, we supported the gradual

phasing out of segregated settings.

In addition, the recent [NSW Legislative Council Report](#) on the experiences of children and young people with Disability in educational settings, with over 20 findings and 28 recommendations agreed with the Disability Royal Commissions findings that Australia's education systems are failing to deliver inclusive education, and provided a plan to overhaul the education system to ensure it is genuinely inclusive and accessible.

Recommendation - A national inclusive education roadmap be adopted as suggested by the [Australian Coalition of Inclusive Education](#) Roadmap. It is vital the UNCRPD's definition of inclusive education be adopted in full.

Recommendation - We strongly recommend Education be developed as a new TAP as there is no discernible improvement in this area.

Outcome area: Economic and financial security

Discussion questions: - Do you agree that addressing employment barriers and post-school transitions should be priorities for future work under ADS? - How should ADS take action to decrease employment barriers? - How should ADS take action to improve post-school transitions? - In what other ways could we improve this Outcome Area?

We agree that addressing employment barriers and post-school transitions should be priorities for future work under ADS. Through its sister initiative, Resourcing Inclusive Communities, we run the School to Work project which aims to bring families together to raise expectations, increase confidence to seek out typical employment and career opportunities for their high school student with disability. Traditionally, students with disability are not afforded the same work experience opportunities as their peers, and many parents are finding these workshops invaluable with positive results. The School to Work project is part of a consortium in 2 other States.

Recommendation - We recommend the School to Work project be rolled out and funded nationally in perpetuity as an ADS action to decrease employment barriers and improve post-school transitions.

Family Advocacy has campaigned for the NSW Department of Education to develop a [Work Transition Pilot Project](#) using the Discovery process under the Customised Employment model. The Disability Royal Commission has supported the implementation of the Customised employment model. This Project incorporates a Discovery and Vocational Profile process (using the Customised Employment Model) for students with significant disabilities as a strategy for increasing access to employment planning and services while at mainstream school. Aimed for students in Year 9/10 which is the typical time to get a part-time job (but can be started earlier.) The aim is to receive paid employment in the general workplace at the end of school for students with significant disability.

Recommendation – We recommend a Work Transition Pilot Project using the Discovery Process under the Customised Employment model be adopted in NSW Schools.

Personal and Community Support

Discussion questions - Do you agree that the disability ecosystem should be a priority for future work under ADS? - How could ADS take action towards improving the disability ecosystem? - In what other ways could we improve this Outcome Area?

We agree that the disability ecosystem should be a priority for future work under ADS. We also agree with Draft Finding 4: ADS reporting does not support government accountability, implementation compliance, or recognising intersectional experiences of people with disability and specifically focus on the Policy Priority of "The role of informal support is acknowledged and

supported.” At Family Advocacy, we advocate that “people keep people safe”. The creation of a network of informal supports, increasing capability to make decisions, raise concerns and being part of community are key preventative factors to address violence, abuse neglect and exploitation of people with disabilities. Many people with disability are not given the right to or be supported to make decisions, take risks, and have their decisions respected. Often, families say their loved one is forced into Guardianship orders once they turn 18 years of age due to inflexible laws and policies for example, in the banking sector. Families and unpaid individuals who support people with disability need capacity building in this area.

In NSW, there is a significant need for Guardianship Law reform alongside capacity building for Supported Decision Making. The NSW set up a Guardianship Working Group in 2023 to advise the government on reform of the Guardianship Act. Rather than accept the Disability Royal Commission’s recommendation to do so, the NSW government responded it will only “closely consider” it.

Recommendation – Ensure ADS reporting supports accountability so that processes and funding be put in place to build capacity for Supported Decision Making and Guardianship Law reform in NSW.

ADS Community engagement

We support Draft Finding 5: For ADS to achieve its goals, it is critical that people with disability are genuinely involved in the design, implementation, and governance of ADS. We also agree with the recommendation from the Discussion paper that a Community Engagement Plan needs to be developed and implemented, in addition to the existing ADS engagement commitments. It is essential State based organisations such as Family Advocacy are involved as we have localised knowledge of what is happening on the ground as well as at the policy level.

Recommendation – Involve Family Advocacy and other disability advocacy organisations at the State level in the design and implementation of the engagement plan and fund them to deliver the engagement plan, where relevant.

Advocacy support

Throughout this process of disability reform and the ADS review, it is essential people are provided with increased access to individual advocacy to help navigate these changes, especially in regional and remote Australia where there is currently extremely limited access. It is essential advocacy organisations be adequately funded to ensure a person with disability has someone in their corner.

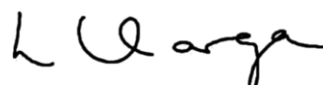
Recommendation – Ensure disability advocacy organisations are adequately funded to support people with disability to design and implement the proposed plans and changes to improve the ADS.

Thank you for the opportunity to provide this response. If you would like to discuss this submission, please contact Leanne Varga, Systemic Advocate and Campaigns Manager at leanne@family-advocacy.com or (02) 9869 0866.

Yours Sincerely



Cecile Sullivan Elder
Executive Officer



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