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ADS Branch: ADS Review
Department of Social Services
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Canberra, ACT 2601
ADSReview@dss.gov.au

To whom it may concern

Re: Review of Australia's Disability Strategy (ADS)

Anglicare Australia welcomes the opportunity to contribute to the Department of Social Services Review of Australia's Disability Strategy. It is vital that all levels of government understand the importance of Australia's Disability Strategy (the Strategy) and take appropriate action to integrate the Strategy into decision making and policy settings. As the Federal Government undertakes a number of critical reforms within the disability sector, it has never been more important that the Strategy is functioning and that we are doing the utmost to improve the lives of people with disability in Australia.

The discussion paper notes that Government has already received feedback highlighting the challenges faced in implementing the Strategy, and recommendations to address concerns. Further, the final report of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (Disability Royal Commission) recognised that there are flaws in the way the Strategy currently functions.

Anglicare Australia welcomed the Disability Royal Commission final report and supports many of its findings and recommendations. We have used the final report and other feedback on the Strategy's performance as a guide in developing feedback for this submission. In doing this, we have identified several areas of concern that would benefit from inclusion or greater consideration in the Strategy Review.

Targeted Action Plans

The Disability Royal Commission noted that the Strategy's Targeted Action Plans (TAP) were too narrow and limited in scope and focus, warning that the current approach was fragmented. The Draft Recommendations put forward in the discussion paper propose the development of new TAPs for three key areas though little explanation is given to indicate what greater national co-ordination for these TAPs would actually look like.

Draft Recommendation 1 calls for refining the mechanisms of the Strategy to support a coordinated approach, including restricting the maximum actions covered by a TAP. It is important that this further clarification is provided on how this would operate in practice. While restricting the number of actions covered by a TAP would certainly help streamline them, it cannot be that governments are left off the hook from addressing areas of potential reform simply because "they ran out of room." Nor does this address the Disability Royal Commission's concern that the TAPs are too limited in scope. If TAPs are to be effective in coordinating government reform work, then a balance must be found between broadening their scope and streamlining to prevent them becoming unworkable. Actions included in TAPs should be supported by clear and reliable mechanisms for measuring outcome and impact, this will ensure we are achieving meaningful change, and that government is accountable for TAP performance.

Human Rights

Anglicare Australia supports the use of a person-centered and rights-based approach when developing policy, programs and legislation which may impact people with disability. We support the development for a TAP focused on Safety, Rights and Justice for people with disability. However, additional work should also be undertaken to review how rights are embedded throughout the entire Strategy.

We note the Disability Royal Commission found that human rights were not consistently addressed throughout the Strategy, and recommended the Strategy give greater consideration to how it aligns with Australia international obligations. Namely, how our obligations under the United Nations Convention on the Rights of People with Disability are being fulfilled through the development and delivery of disability policy and programs across Australia. At current, the discussion paper does not have an explicit recommendation about reviewing the Strategy to ensure a harmonious approach to human rights and Australia's international obligations, is embedded throughout the entire Strategy.

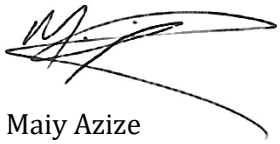
Further, the Disability Royal Commission recommended the implementation of additional human rights protections for people with disability. Aligning the intentions of the federal government on implementing these recommendations with an expansion and clarification of how this fits in with the Disability Strategy will be key to achieving a stronger outcome.

In recent weeks, Anglicare Australia submitted feedback to the Department of Social Services consultation on the new disability employment services model. In that submission we noted that the creation of a specialist cohort stream within the new model was at odds with the Guiding Principles of the Strategy.

As the Strategy points out, there is a risk that cohort categorisation reinforces incorrect assumptions about disability or frames needs through a deficit lens. While our submission supported the reforms to the disability employment services model, it was somewhat unclear how the reforms would operate and engage with the Strategy. We have called on government to work collaboratively with people with disability and the disability employment sector to manage risk and foster a culture of trust across disability services.

We would welcome the opportunity to expand on our recommendations, or further discuss our proposals in this area. Please do not hesitate to be in touch if you would like to discuss the issues raised in greater detail.

Yours sincerely



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