



## National Disability Services Victoria Submission to the Victoria State Disability Plan (2021-2025)

April 2021

### Overview

National Disability Services (NDS) is pleased to make a submission to inform development of the Victorian State Disability Plan (2021-2025). NDS recognises the critical role that the Victorian government plays in creating an inclusive and accessible community for all Victorians, including people with a disability. We welcome the considered and consultative approach that is being taken in developing a comprehensive and inclusive State Disability Plan (2021-2025).

### National Disability Services

National Disability Services (NDS) is the peak body in Victoria and Australia for non-government disability service providers, with over 280 members in Victoria and 1,080 members nationally. We provide information and networking opportunities to our members, and policy advice to State, Territory and Commonwealth governments. NDS has a diverse and vibrant membership, comprised of small, medium, and larger service providers that deliver direct and indirect support to people with disability. Our members collectively offer the full range of disability services, from supported independent living and specialist disability accommodation services to respite, therapy, community access, and employment. Our National Disability Practitioners (NDP) branch has over 15,000 individual members across all aspects of the disability workforce.

NDS is committed to the full implementation of the National Disability Insurance Scheme (NDIS), and to supporting Victorian service providers to thrive with high quality, person-centered supports. Importantly, we are also committed to seeing the National Disability Strategy fully implemented, so that it can achieve its potential as a guiding framework for a truly inclusive nation. At this time of discussion about the future sustainability and shape of the NDIS, it is timely to consider the initial picture of the Scheme which emphasised the building of mainstream and community-based supports for people with disability beyond those in receipt of NDIS plans. Responsibility for such investment lies largely with the state government, and we look to the State Disability Plan to drive such change, with robust, ambitious and measurable targets across all areas of government jurisdiction.

The COVID-19 pandemic has come on the tail of the transition of the Victorian disability sector to the NDIS. NDS has been working closely with disability service providers to deliver COVID-safe services and to determine what the Victorian community will look like in 2021-2025. Our collective aim is for ambitious targets to be funded to significantly improve the inclusiveness, accessibility, and opportunities for people with disability. We are using this submission as an opportunity to communicate some of our ideas with you.

## Introduction

NDS embraces the opportunity to contribute to the discussions that will inform the State Disability Plan (2021-2025). We support the focus on the following essential topics, that will support people with disability to live well into the twenty-first century.

1. Improving how we describe disability and disability inclusion in the next plan
2. Finding better ways to include people with disability in making the next plan
3. Strengthening the state disability plan outcomes framework
4. Introducing overarching approaches to strengthen government commitments under the new plan
5. Strengthening the NDIS and mainstream interface
6. Strengthening disability inclusion under the Disability Act (2006)

While we look forward to the new State Disability Plan, NDS also supports the development of initiatives within the outcomes framework, as described in the previous plan. The domains of, inclusive communities, health, housing and wellbeing, fairness and safety, and contributing lives are still relevant in a post COVID-19 environment. We also recognise the importance of universal design, accessible public transport and inclusive schools, acknowledging the achievements that have been made since the State Disability Plan (2017-2020). The development of new topics is critical to Victoria, a state that has embraced the NDIS and made significant improvements in recent years to transport, community access and choice and control of people with disability, but still has some milestones to achieve.

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## Submission

1. Introducing overarching approaches to strengthen government commitments under the new plan

NDS is calling for the State Disability Plan (2021-2025) to be aspirational and include targets that all levels of government commit to deliver. For people with disability to live well in Victoria, there need to be a raft of initiatives across justice, health, education, entertainment, and the workplace. The State Disability Plan (2021-2025) is an opportunity for Victoria to continue to build a framework to drive greater inclusion of people at every level and in every context in Victoria. The current work on infrastructure and housing strategies and jobs creation provides further opportunities to embed the needs of people with disability as a priority.

It is critical that the Victorian government commit to the National Disability Strategy and align the State Disability Plan to this national framework. We would like to see the state continue to advocate for the National Strategy to be supported with a detailed implementation plan with funded targets, and national reporting of progress.

2. Strengthening the state disability plan outcomes framework

As mentioned above, NDS supports the State Disability Plan Outcomes Framework as detailed in the State Disability Plan (2016-2020). We support the continuation of the domains; inclusive communities, health, housing and wellbeing, fairness and safety and contributing lives. We also support the identification of key priorities, that differ to those in the last plan that was released whilst the disability sector was being introduced to the NDIS. We propose that priority is given to community education about disability, prevention of abuse, health, universal design and accessible public transport.

NDS is concerned that if the State Disability Plan is held within the Department of Families, Fairness and Housing (DFFH), that this may not have the political leverage to drive other Departments to invest substantially in disability inclusion initiatives. We would like to see oversight of the Plan sit with the Premier's Department. Ideally, this would be accompanied by ambitious and funded targets, with reporting of progress to Parliament, similar to the Closing the Gap program.

### 3. Strengthening the NDIS and mainstream interface

NDS understands that the key to maximizing the effectiveness of NDIS plans is to ensure that there is flow between other government areas that are outside the scope of the NDIS. There is major room for improvement in the interface between disability services and each of the mainstream services, including health, education, justice, housing etc. Each of these areas needs targeted consideration of the barriers to access and inclusion, and then implementation of funded initiatives to drive change.

### 4. Prevention of Abuse

NDS is committed to a sector with zero tolerance of abuse towards people with disability. We are proud of our array of zero tolerance resources which we actively promote across the sector. There is concern that in recent years we are seeing a multitude of government compliance initiatives, and very limited investment in prevention. We would like to see a focus on changing community attitudes through education and advocacy measures, and a refresh of existing zero tolerance resources. Current community discussions on consent in intimate relationships and sexual harassment in the workplace are also relevant to people with disability.

### 5. Health

NDS knows that health equity does not exist between people with disability and other members of the Victorian community. Whilst we generally call for an improved interface between the disability and the health sector, we are also asking for the Comprehensive Health Assessment Program (CHAP) to be subsidised for use with all people with intellectual disability throughout Victoria. The aim of CHAP is to minimise the barriers to people with an intellectual disability accessing health care and screening services. The output of the CHAP is that adults with an intellectual disability undergo a comprehensive health assessment to assist doctors to make better diagnoses, prescribe appropriate treatments and ensure overall improved health outcomes. This is an evidence based and highly regarded tool, designed to address a critical issue of general health. In the past all people in Victorian government group homes were able to access CHAP assessments. This is now only subsidised for people in the transfer homes, a situation that we would like to see changed.

### 6. Universal Design

NDS recommends that universal design principles are applied to new buildings in Victoria, to ensure that they meet the current and future needs of Victorians. This includes the application of the Australian standards to enable physical access of all people in all new building developments. There needs to be an increase in the number of changing places toilet facilities that include hoists and change tables. These facilities are needed by people with complex disabilities in general areas e.g., parks, shopping centres and other buildings accessed by the public.

In addition to buildings and housing stock, NDS recommends that improvements are made to the communal access areas across Victoria. Pathways need to be even, well-signed, and have regular wheelchair access points. Car parks should have adequate numbers of well-positioned car

spaces, allocated only to people with disability. All theatres and buildings with fixed seating, need to have gaps in the seating so, that people in wheelchairs can access events and shows.

#### 7. Accessible Infrastructure

For people with disability to have equal access to facilities in the community, all government buildings will need to be compliant with contemporary accessibility standards. A higher application of the standards will result in people with disability and people with mobility issues having the same access to community services as other people, to the ultimate benefit of the Victorian community.

NDS applauds the introduction of accessible tram stops in Melbourne, that have benefitted people with mobility issues. We would like to see more accessible tram stops in Melbourne and regional areas be built in the next few years. This will ensure a safe viable tram network for all Victorians.

#### 8. Improving how we describe disability and disability inclusion in the next plan

NDS is aware of the importance of how people with disability and people with a psycho-social disability are described. Consistency of terms is important in eliciting the support of members of the community for the inclusion of people with disability in health, justice, entertainment, building design, education and workplaces.

NDS notes that effective government policy and positions are deeply informed by input from the community, and in this context, by people with disabilities and service providers. We have welcomed the consultations held in 2021 on the State Plan and look forward to ongoing consultative mechanisms which will ensure that government continues hearing the voice and views of people with disability and providers.

#### 9. Finding better ways to include people with disability in making the next plan

NDS engages in consultative practices with our membership and the broader disability sector. We believe that the State Disability Plan is stronger for the input of people who work in the sector as well as people with disability. For people with disability to have equal access to consultation processes, accessibility issues need to be considered. These include written documents in large print and braille, AUSLAN interpreters at forums, wheelchair accessible venues, as information written in Easy-English. Furthermore, we note that communication mechanisms are adapting, and increasingly people access information via social media, on their phones rather than through computers, and via podcasts and videos rather than through written material. NDS supports the use of advocacy and peak bodies to engage with cohorts of people, as such organisations have the credibility and reach to ensure effective engagement.

It is also noted that people will actively choose to be part of a consultation process, if it is apparent that the ideas that have previously been communicated have genuinely been incorporated. Suggestions will need to have ambitious targets and be funded as targeted projects.

For further information, please contact Simone Beyfus, [simone.beyfus@nds.org.au](mailto:simone.beyfus@nds.org.au)

Sarah Fordyce  
State Manager, Victoria

NDS

0447 441 505

[Sarah.fordyce@nds.org.au](mailto:Sarah.fordyce@nds.org.au)

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