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## **Response to the Department of Social Services on improving outcomes for people with disability under the National Disability Strategy and the National Disability Insurance Scheme**



**18 December 2020**

### About Queenslanders with Disability Network (QDN)

Queenslanders with Disability Network (QDN) is an organisation of, for, and with people with disability. The organisation’s motto is “nothing about us without us”. QDN operates a state-wide network of over 2,000 members and supporters who provide information, feedback and views from a consumer perspective to inform systemic disability policy and disability advocacy.

QDN also operates 21 Peer Support groups across a range of metropolitan, regional and rural and remote locations in the state, run by people with disability for people with diverse disabilities. members and supporters who provide information, feedback and views from a consumer perspective to inform systemic disability policy and disability advocacy.

QDN undertakes a range of work activities and projects as outlined on QDN’s web-site and detailed in our latest [2019-2020 Annual Report](https://qdn.org.au/wp-content/uploads/2020/10/QDN-Annual-Report-2019-20_web.pdf). Our systemic advocacy work encompasses a range of responses – from community campaigns, formal submissions, evidence to commissions and inquiries, and membership of roundtables and working groups around national, state and local government legislative and policy initiatives.

QDN’s work is focused on the rights and full social and economic inclusion of people with disability, along with areas of key importance identified by Queenslanders with disability – the National Disability Insurance Scheme (NDIS), improving mainstream services that people with disability rely on every day, including health, housing employment and transport, and most recently the impact of COVID-19.

### Overview

QDN welcomes the opportunity to provide feedback to the Australian Government Department of Social Services on measuring improved outcomes for people with disability under the National Disability Strategy and the National Disability Insurance Scheme. QDN acknowledges that the NDS is part of a broader and changing policy landscape that includes the introduction and implementation of the National Disability Insurance Scheme (NDIS) from 1 July 2013, the review of the National Disability Agreement (NDA) in 2018 by the Productivity Commission, and the endorsement of the National Disability Strategy 2010-2020 (NDS) in February 2011. The proposed NDS Outcomes Framework will provide an overarching architecture for states, territory and local governments to develop their disability plans, data and reporting systems to ensure they respond to the NDS and feed into the accompanying outcomes framework. In Queensland, there will be opportunity with the development of the next All Abilities Queensland Plan to consider the inclusion of more detailed measures so that individual departmental disability service plans can allow the collection of data to demonstrate progress with delivering on the Queensland Government’s vision to help build an inclusive Queensland for all Queenslanders, so the one in five Queenslanders with disability can thrive and reach their full potential as equal citizens.

QDN acknowledges that, over the past three decades, all levels of government have been working towards improving outcomes for people with disability and delivering more inclusive communities.

***“We would like to make sure that the metrics and framework is suitable for all Australia, all populations of people with disability, from all backgrounds.”***

***(QDN member consultation - November 2020)***

The cross-jurisdictional and cross-portfolio responsibilities of governments for ensuring good outcomes for people with disability are clearly expressed in the 2008 United Nations Convention on the Rights of Persons with Disabilities (CRPD). The CRPD provides the framework for Australia’s international obligations across all levels of government. QDN believes this needs to underpin all agreements, strategies and reporting frameworks in order to deliver more inclusive lives of people with disability.

QDN acknowledges and supports the proposed vision for “An inclusive Australian society that enables people with disability to fulfil their potential as equal members of the community.” It is complementary to QDN’s vision that is “people with disability are active and valued citizens” and QDN’s mission that is “empowering people with disability to be fully included as citizens in the social and economic life of the community.”

***“The outcomes framework needs to focus on maximum outcomes rather than bare minimums, particularly in relation to employment goals and strategies.”***

***(QDN member – consultation November 2020)***

QDN is conscious also of the outcomes and measures developed by the NDIA to cover the Individual Capacity Building Program, the Organisational Capacity Building program, and the Information, Linkages and Capacity Building Program focusing on individual outcomes and capacity building, both for people with disability and the organisations that support them. The data collected through these processes link directly to the domain outcomes in the proposed outcome framework, so mapping the range of data sources and how they interact would be a useful addition to the visual framework at Attachment A of the draft framework.

Through QDN’s state-wide member network, QDN members continue to raise the issues and challenges they face accessing mainstream services such as health, housing, transport, employment, education, sport etc. Some believe that this is being exacerbated by the introduction of the NDIS and the poor delineation of responsibility between individual specialist disability support and mainstream service delivery.

QDN also notes that it is vital that outcomes for people with disability are measured, monitored and reported on to ensure that the NDS and the NDIA deliver the positive impacts and improvements which is their intention, and that there are goals linked to specific actions and outcomes that are measurable and can be reported on. QDN supports the establishment of an outcomes framework so there is a dedicated focus on measurement of outcomes and believes this requires a clear articulation of each of the governments’ roles and responsibilities in achieving the outcomes and meaningful change within a combined approach. Each level of government has a responsibility for delivering accessible, affordable, safe and quality services for all people with disability.

While the NDIS focuses on specialist disability supports, there remain problematic interface issues with mainstream services and challenges for Australians with disability in accessing these services. An outcomes framework needs to be underpinned by stronger alignment with the CRPD, providing greater accountability in ensuring that all levels of governments deliver on their CRPD obligations. Whilst Australia regularly reports on its obligations to this international instrument, consideration could be given to how more detailed data could be integrated as part of the accountability, measurement and reporting framework.

The Office of the United Nations High Commissioner for Human Rights publication *Human Rights Indicators* acknowledges the recognition of indicators for realising human rights and provides a guide for using them systematically. The need to place people at the centre of policy development, and for policy management, human rights and statistical systems to be aligned with each other in order to promote people’s well-being is at the core of this approach. QDN supports the approach outlined in this document in terms of the limitations of indicators and data, and that they should not be regarded as a substitute for more in-depth and qualitative assessments.

### Outcomes Frameworks

QDN provides the following feedback in response to the discussion paper seeking feedback on the following:

* the different elements in draft structure for the Outcomes Frameworks
* best implement the Outcomes Frameworks to enable governments and stakeholders track the effectiveness of the Strategy and the NDIS
* what else should be considered when we are monitoring and measuring the impact of activities on people with disability.

### Elements

QDN supports the six outcomes areas under the current Strategy as the most appropriate areas for retention in the next strategy going forward, and an outcomes framework for measurement of those outcomes, along with measurement of NDIS outcomes for participants. We note that the six Domains in the draft Outcomes Framework are the same as the six broad outcome areas the current National Disability Strategy is structured around.

QDN sees that critical to the effective implementation of the strategy is building the capacity of people with disability and their families and carers to understand the roles and responsibilities and the required accountability so they can act from an informed place to measure impact, change and outcomes.

Additionally, QDN sees that it is important that there is a nationally consistent approach to identifying and recording data related to disability and the definition of disability as this will be important in reporting on individual/person level data vs population level data.

There needs to be consistency across each of the domains that measure concrete outcomes vs aspirational goals and measurements that can be subjective. At the moment, there is a mixture across the ‘sub-outcomes’ and QDN recommends that there is consistency across each domain. QDN also suggests that the use of ‘sub-outcome’ is removed and is alternatively named to reflect the person-centred focus.

QDN sees that it is critical that the elements of the NDS Outcomes Framework include:

* Co-design with people with disability, from the planning, design, development, review and reporting on outcomes
* Indicators must reflect and align with the Convention on Rights of People with Disability and the Articles that define behaviour and outcomes
* Approach to the framework and therefore reporting that enables how things are improving, how things are getting worse and how things are staying the same
* Social determinants of health and well-being as an important consideration in the indicators and measures
* An approach that clearly measures progress in relation to people with disability in comparison with population level data for people without disability to ensure progress is being made
* Public reporting at Commonwealth, State/Territory and Local level is required to ensure accountability and visibility to the whole population
* Consistency of wording and framing of outcomes measures to all be positively framed and consistent in language
* Stronger focus and clearly defined outcomes to measure leadership of people with disability and their contributions
* Consideration of the use of the word ‘equitable’ alongside ‘accessible’ as an outcome measure to ensure there are changes and adjustments made to the way services are delivered that may be differently interpreted to ‘accessibility’ measures.

QDN provides the following specific comments on each domain area and proposed outcomes/indicators:

|  |  |
| --- | --- |
| **Domain** | **QDN Comment** |
| Inclusive and accessible communities | QDN would recommend that a measure is also put in place for rights, choice, inclusion and control for housing that includes outcomes that reflect the following key principles   * People can make informed decisions about their housing choices * Built and natural environments are built to universal design standards * People can live in their own home and it is respected as their home, not as someone else’s workplace * People can visit other people’s homes and access private housing because it is designed and built to universal design standards * Transport measures need to align with minimum legislative standards of accessibility rather than have navigation as a measure |
| Economic security | QDN would recommend that as well as employment opportunities there is a specific measure named that reinforces ‘getting a job’.  Self-employment could be added to example indicators |
| Health and well-being | QDN recommends that health literacy and health prevention are both identified as a sub-outcomes and example indicators that includes   * I can access information that I need in the way that I need it to make informed decisions about my healthcare and well being * I can access health prevention services |
| Rights, protection, justice and legislation | QDN recommends that access to inclusive disaster planning, response and recovery is includes as a sub-outcome measure to link with the indicator of disability-inclusive disaster planning  QDN also recommends that a measure for inclusive disaster preparedness can include   * Local Government and Disaster Management services with disability inclusive plans * Disability and Community Services that have Disaster Business Continuity Plans that include their clients/participants to have individual disability disaster plans in place   With regard to access to justice and protection, QDN recommends that example indicators can also include reporting from Courts, Police, Corrections for both victims and offenders within the systems.  Access to advocacy support should be included in this domain. |
| Learning and skills | QDN recommends that this section also includes reporting on segregated educational settings as well as inclusion in mainstream settings to transition and change to inclusive education can be measured, as well as detail on supports students are receiving in educational settings. |
| Personal and community support | QDN recommends that some of the measures need to include whether services received are those that are most appropriate eg, Measurement of people with disability still receiving aged care supports when eligible for disability supports, and impacts where there are no supports in place. |
| Community attitudes | QDN acknowledges the challenges in measuring and reporting in this area and the subjectivity of data and perceptions. |

### Implementation

QDN supports specific measurable goals against a newly created outcomes framework, that are created in consultation with people with disability and are routinely measured by Commonwealth, State/Territory and Local Governments and reported publicly on an ongoing and regular basis.

Given the transformational change involved in national reforms such as the NDIS and NDS and the touch points for disability across multiple portfolios, QDN supports mechanisms which give a central governance structure and focus on disability within Commonwealth and State/Territory Governments. As noted in the Senate Standing Committee on Delivery of Outcomes under the National Disability Strategy 2010-2020 to Build Inclusive and Accessible Communities, consultation and coordination were seen as barriers to progress under the strategy, requiring increased levels of consultation around the establishment of goals, implementation plans and evaluation strategies. A centralised and linked structure with accompanying outcome measures and reporting would ensure co-ordinated linking across disability national reforms and related National Agreements. These central agencies should also ensure specific engagement and representation by people with disability within dedicated advisory and monitoring bodies to inform the planning, design, delivery and implementation of these national policy mechanisms, and their associated outcomes.

***“Data collection strategies need to be improved, and this is a shared responsibility between States and Commonwealth – this should be a goal in the Outcomes Framework.***

***The data from the NDIS is only 10% of the population of the demographic that needs to be reported on.” (QDN member consultation - November 2020)***

The Queensland Government has acknowledged the need for the involvement of people with disability in the development of the next All Abilities Queensland Plan, which is the State disability plan, by establishing an All Abilities Queensland Working Party consisting of at least 50% people with disability. QDN strongly endorses this approach as evidence of the ‘Nothing about us without us’ philosophy, which we would like to see embedded throughout planning and development processes at all levels of government.

Data gathered should be utilised in conjunction with peer led co-designed consultation and input –

“***The thing that is missing is peer-led co-design, and this needs to feature in all of the domains. The NDIS has given some ways of gathering feedback, but co-design needs to be front and centre, whether it is setting up more consultation councils, focus groups or other structures, it is crucial to establish. This would allow voices from outside government to be heard.” (QDN member consultation - November 2020)***

QDN members identified that people with disability need to be part of the governance mechanisms and this could be achieved through inclusion of disabled person organisations in the governance strategy. QDN believes that an important part of measuring performance is that the end-users of the service are involved in the reporting and evaluation of output and outcome measures. Consideration of structures similar to New Zealand and the reporting, monitoring and review of outcomes by people with disability and disabled person organisations that sit outside Government should be given. QDN supports that disability policy, practice and research should continue to be strongly informed by the voice and experience of people with disability.

Critical to all of this is the access to funded independent individual and systemic advocacy for people with disability and their families and carers. Access to advocacy support is not noted in framework and we believe should be a ‘sub-outcome’ and example indicator. This also reflects some of the key findings and evidence emerging from the Disability Royal Commission and the importance of access to independent individual, citizen, and systemic advocacy.

### Other considerations - monitoring and measuring impacts

QDN identifies that it is important moving forward that the method for alignment of reporting data for the National Disability Strategy that is collected through a range of Australian Bureau of Statistics population surveys, data collected under National Agreements, and data available through the NDIS and a national consistent data collection approach to report on the indicators and outcomes of the strategy. Current reporting on the NDS occurs two-yearly, which is not regular enough to provide meaningful data to track progress on improvements in the lives of people with disability in Australia.

One QDN member proposed more disability related questions could also be included in the national Census to capture information to inform measurement of NDS outcomes, which could be included under census questions relating to outcomes framework domains such as health, education, employment and housing.

QDN members identified critical factors around measuring outcomes and reporting needs to include people with disability themselves. QDN members also identified that it is important that there are independent impartial monitoring mechanisms in place. The vital issue of how to obtain data from the more than 4 million Australians the Australian Institute of Health and Welfare reports as having a disability remains a question, rather than only the 413,000 active NDIS participants reported in the National Quarterly Performance Dashboard as at 30 September 2020.

QDN believes it is important that a strong national governance mechanism is in place for all Australians with disability, that supports and delivers objectives, outcomes, performance indicators, roles and responsibilities and policy actions for all levels of government.

***“The tools for measurement need to be robust, and need to be formulated by industry and in consultation with people with lived experience” (QDN member – consultation November 2020***

Given the provision of services and supports for people with disability through mainstream services and the NDIS, it is critical that , as mentioned previously, an overarching National Disability Agreement and National Disability Strategy between State/Territories, Local governments and the Commonwealth is in place to measure progress and report on outcomes of specific performance indicators relating to the domains in the proposed Outcome Framework to drive meaningful change on the ground for people with disability.

***“There needs to be more done to build trust of the data that is produced. This trust building is crucial, and data needs to be reported on accurately.” (QDN consultation - November 2020)***

Additionally, the issue of data and data collection was raised by QDN members. Data needs to be captured from all parts of community and there is acknowledgement that whilst Government services deliver a range of mainstream services and supports, the non-government sector plays a critical role and must be included in the implementation, monitoring and measurement of outcomes. QDN acknowledges the work being undertaken around the National Disability Data Asset (NDDA) and sees nationally consistent data as a critical step in being able to measure and then therefore improve outcomes for Australians with disability. Data sets which can be shared in order to better understand the life experiences and outcomes for people with disability with Australia will be highly beneficial.

***We are concerned that the data collection is not accessible, so the figures may not accurately represent the situations, particularly for people experiencing many barriers.***

***Reporting back to the community also needs to be accessible for everyone in the community to access – this is our lives.” (QDN member – consultation November 2020)***

QDN would like to see longitudinal outcome data collected on people with disabilities’ whole-of-life aspirations, employment, community inclusion, self-determination, choice and decision-making, satisfaction with services and supports, and measures against inclusive and accessible communities, rights protections, economic security, personal and community support, learning and skills, and health and wellbeing which are in line with the principles and obligations of the CRPD.

Important consideration needs to be given to the mechanisms for collecting and reporting on the data, but key to driving change will be regular, public, accessible and transparent reporting of outcomes and QDN members recommend that this reporting is done annually. QDN recommends that there are requirements for Local, State/Territory and Commonwealth Governments to inform and input into reporting. It is also vital that people with disability can contribute their experiences so there is evidence of what is occurring in people’s lives and measure the outcomes in a real sense.

***“Statistics and reporting are great but if nothing is done, if targets aren’t met or the reporting is so infrequent it is irrelevant and then it is pointless.” (QDN member survey October 2020)***

***“The disability sector needs a forensic analysis of how everything is working, put it all on the table and do a deep analysis – expand programs that are doing well, and really look at evaluations as tied to funding for services and providers” .” (QDN member consultation – November 2020)***

### Conclusion and Recommendations

QDN is pleased to provide feedback to the Department of Social Services in the development of the Outcomes Frameworks for Improving outcomes for people with disability under the National Disability Strategy and the NDIS. QDN’s submission has focused on a number of key issues that have been raised by members based upon their lived experience of disability.

To inform the development of the Outcomes Framework, QDN recommends the following be included:

* Human rights focus underpinned by the CPRD, and alignment with [United Nations Human Rights indicators](https://www.ohchr.org/EN/Issues/Disability/Pages/SDG-CRPDindicators.aspx#Indicators) to enhance human rights implementation and measurement
* Inclusion of requirements to implement and report on National Disability Strategy and NDIS outcomes in the National Disability Agreement and other Commonwealth/State/Territory National Agreements across multi-jurisdictional portfolios such as health, housing etc.
* Inclusion of disability inclusive disaster risk reduction and inclusive emergency preparedness, response and recovery within Outcome 6 – Health and Wellbeing
* Inclusion of key outcomes to implement strategies and outcomes focused on the leadership of people with disability
* Investment and clear measurable outcomes to improve community attitudes and values about people with disability
* Investment in individual, systemic and citizen advocacy
* Improved data capture around people with disability and service provision to evaluate the effectiveness of the NDA and NDS, and outcomes experienced by NDIS participants.
* Strong national governance strategy and structure that is integrated with state/territory and local governance mechanisms to ensure the coordinated and coherent implementation of the strategy and outcome measures. This needs to include senior officials across the Government and non-government sectors as well as Disabled Person Organisations.
* Clear actions and plan to build the capacity of people with disability and the broader community to understand the NDS, the roles and responsibilities, and accountability so they can be informed to measure impact, change and outcomes
* Establishing of the outcomes framework as an independent and impartial monitoring mechanism that delivers an independent perspective on progress, outcomes and measurements and enables people with disability to provide feedback, input and contribute to measuring progress of outcomes
* dedicated centralised governance structure within the Commonwealth, State and Territory, and local governments to ensure the coordinated and coherent implementation of disability policy and programs
* A requirement for an annual report to be tabled publicly that is accessible and transparent and communicated effectively to people with disability, families and carers and the broader community. This reporting should include an Annual Progress Report informed by data from each local government authority, state/territory jurisdiction, and the Commonwealth Government that must include data and feedback from people with disability directly.
* Development of a regulatory legislative framework and policy mechanism that includes prescribed requirements for engagement plans that mandate the inclusion of people with disability in the development of policies, programs and services across all levels of Government and government funded services.

We note the importance of the National Disability Strategy in terms of providing the setting and environment for the success of the NDIS in terms of outcomes for participants – the two are inextricably related. If access, inclusion, education, employment, health and well-being and rights, protection, justice and legislation are not experienced by people with disability in their daily lives, it remains difficult for them to achieve the outcomes and benefits the NDIS can offer.

QDN looks forward to continuing to work with the Commonwealth Government, the Department of Social Services and all levels of Governments, industry, business and the broader community to ensure an inclusive Australian society that enables people with disability to fulfil their potential as equal members of the community.

**QDN – 18 December 2020**

### Appendix 1. QDN’s Value Statement on People with Disability

QDN’s work in providing feedback and input into systemic policy issues is based upon the organisation’s core values and the place of people with disability in an inclusive Australian society.

QDN believes that:

* all people with disability have a right to a place in the community and have contributions to make to community. This is as empowered, free citizens who are as valued, present, participating and welcomed as members of any dynamic and diverse society
* the place of people with disability in the community is not just about people with disability having a house in the community. Core to this is that they are welcomed in the community as ordinary citizens, where they are genuinely given opportunities to contribute and actively participate. People with disability need to be in communities where their individuality, their talents and their lived experiences of disability are recognised and acknowledged
* culturally and historically, people with disability are not afforded the same value, opportunities or access to community life
* any inclusion in community for people with disability is conditional and vulnerable to withdrawal
* many people with disability in Queensland are excluded from the most basic experiences of ordinary lives
* current exclusionary practices are unacceptable and must be challenged
* these issues affect not only people with disability but the whole community
* the responsibility is shared. It lies within government (federal, state and local) and the community at large, to ensure that people with disability have a place and are resourced to belong in community.