

Submission to Department of Human Services about the draft State Disability Inclusion Plan 2025-29

[**5 June 2025**]

About the Submitter

JFA Purple Orange is an independent, social-profit organisation that undertakes systemic policy analysis and advocacy across a range of issues affecting people with disability and their families.

Our work is characterised by co-design and co-production and includes hosting a number of user-led initiatives.

Much of our work involves connecting people with disability to good information and to each other. We also work extensively in multi-stakeholder consultation and collaboration, especially around policy and practice that helps ensure people with disability are welcomed as valued members of the mainstream community.

Our work is informed by a model called *Citizenhood*.

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# Summary and recommendations

We recommend:

**Recommendation 1: The State Government should use the Model of Citizenhood Support to inform the design of the State Plan and measure its impact.**

**Recommendation 2: The State Government should review and strengthen the State Plan’s outcomes framework to ensure it gives effect to the South Australian Government’s obligations under the UNCRPD to respect, protect and promote the rights of people with disability.**

**Recommendation 3: The State Government should review and strengthen the State Plan’s outcome framework to ensure it gives effect to the South Australian Government’s commitments under the ADS.**

**Recommendation 4: The State Government should amend the State Plan to ensure it aligns with the recommendations of the Disability Royal Commission, particularly with respect to moving away from segregation (e.g. in housing, education, employment) as this can lead to violence, abuse, neglect and exploitation of people with disability.**

**Recommendation 5: The State Government should develop a time-bound roadmap for implementing the Disability Royal Commission’s recommendations and ensure that the State Plan aligns with this. The State Government should report on DRC implementation in each State Plan annual report.**

**Recommendation 6: The State Government should adopt a robust co-design process when revising the Plan, working with the Disability Minister’s Advisory Council that was established for this purpose pursuant to the *Disability Inclusion (Review Recommendations) Amendment Act 2024* (SA).**

**Recommendation 7: The State Government should amend the State Plan to include a priority area on ‘collaboration, consultation and co-design’ in each of the five Domains. This should be accompanied by additional measures, such as: ‘total number of co-design processes undertaken to make decisions on matters affecting people with disability’ and ‘total number of people with disability represented on co-design groups to make decisions on matters affecting people with disability.’**

**Recommendation 8: The State Government should amend the State Plan to include an outcome on building the skills and capacity of all state authorities to undertake robust co-design processes with the disability community.**

**Recommendation 9: The State Government should revise the State Plan to ensure inclusive, respectful and rights-based language is used throughout. Adopting a co-design process to revise the draft Plan would ensure that decisions on language are made by people with lived experience of disability, reducing the risk of inappropriateness and offence.**

**Recommendation 10: The State Government should amend the State Plan Outcomes Framework to include measures that require inter-agency collaboration (e.g. policy or legislative reform) where this would strengthen progress towards outcomes.**

**Recommendation 11: The State Government should amend the State Plan to:**

* **Acknowledge that Foundational Supports will be rolled out within the life of the Plan;**
* **Commit the State Government to updating the Plan through a co-design process once Foundational Supports has been designed, to ensure they align; and**
* **Set out a State Government commitment to implementing the Plan in a way that strengthens the rollout of Foundational Supports and provides the best possible support to people with disability who cannot access the NDIS or who need help that the NDIS cannot provide.**

**Recommendation 12: The State Government should co-design a rights-based vision statement to be included in the State Plan.**

**Recommendation 13: The State Government should amend the State Plan to include high-level commitments that apply to all state authorities, as well as reporting requirements and accountability measures. These should cover cross-cutting issues such as involvement of people with disability in decision-making; accessible communication and information; universal design; intersectional approaches; inter-agency collaboration; procurement policies; employment of people with disability; and effective data and reporting.**

**Recommendation 14: The State Government should rework the introductory part of the State Plan section, ‘A spotlight on our seven Priority Groups’ to incorporate a more sophisticated, nuanced understanding of intersectionality that recognises the compounding barriers faced by people with intersecting identities.**

**Recommendation 15**: **The State Government should revise the descriptions of all seven priority groups in the State Plan through a co-design process with representatives from each priority group. The descriptions should be rights- and strength-based, with a focus on the barriers experienced by these groups as a result of their intersectional identities.**

**Recommendation 16:** **The State Government should revise the State Plan Outcomes Framework to include outcomes and measures that relate to the specific barriers faced by the seven Priority Groups. These should be co-designed with representatives from each priority group.**

**Recommendation 17: The State Government should revise the State Plan by deleting references to ‘vulnerability’ or the ‘significance’ of a person’s disability (in the description of the Priority Group ‘people with significant intellectual disability or who have high levels of vulnerability due to disability’). Alternatives could include ‘people with intellectual disability or people who experience particularly acute barriers to access and inclusion’ or ‘people with intellectual disability or people with disability from particularly marginalised groups.’**

**Recommendation 18: The State Government should amend the headings of the State Plan’s five Domains as follows:**

1. **Inclusive homes and communities (instead of ‘Access’)**
2. **Education and Employment (instead of ‘Opportunity’)**
3. **Personal and Community Support (instead of ‘Support’)**
4. **Health and Wellbeing (instead of ‘Wellbeing’)**
5. **Safety, Justice and Rights (instead of ‘Justice’)**

**Recommendation 19: The State Government should review each outcome in the State Plan to ensure they are specific enough to drive meaningful change. Where appropriate, outcomes should be framed as specific, ambitious targets with a timeframe.**

**Recommendation 20: The State Government should strengthen and expand the measures included in the State Plan, to ensure they enable clear measurement of progress towards the relevant outcomes. Where appropriate, the State Government should add measures that capture qualitative data about the personal experiences of people with disability.**

**Recommendation 21: The State Government should expand the outcome for Priority Area 1, under Domain 1, to include ‘events’, not just ‘communities.’ Greater context should be provided in the introduction to Domain 1 about what best practice inclusive event management involves, including reference to the Accessible Events Checklist.**

**Recommendation 22: The State Government should change the wording of Priority Area 2 from ‘understanding and acceptance’ to ‘inclusive communities’ or ‘inclusive community attitudes.’ The outcome should shift its focus from awareness and understanding of barriers to improving community attitudes. For example, ‘The South Australian community understands disability inclusion and demonstrates inclusive attitudes and behaviours.’**

**Recommendation 23: The State Government should amend measure 2.1, under Domain 1, from ‘total number of activities undertaken to promote and profile disability inclusion in the South Australian community’ to ‘total number of activities undertaken to promote disability inclusion and improve community attitudes towards people with disability in SA.’**

**Recommendation 24**: **The State Government should add measures under Priority Area 2, Domain 1, regarding 1) the number of activities undertaken to promote disability inclusion and improve attitudes towards people with disability within state authorities and 2) the impact these have had on the knowledge, confidence and attitudes of staff.**

**Recommendation 25: The State Government should add an additional measure under Priority Area 5, Domain 1, to capture the direct experiences of people with disability in finding accessible information.**

**Recommendation 26: The State Government should add an additional measure under Priority Area 6, Domain 1, to assess how many people with disability who use access taxis are able to get where they need to go safely and on time.**

**Recommendation 27: The State Government should amend measures 3.2. and 3.3 by breaking them into separate measures, as follows:**

* **Total number of new state authority developments (including buildings, spaces and infrastructure) that incorporate universal design principles;**
* **Total number of new housing developments that comply with the Livable Housing Design Standard under the National Construction Code 2022, without the use of concessions; and**
* **Total number new housing developments that comply with the Voluntary Livable Housing Design Gold Standard under the National Construction Code 2022.**

**Recommendation 28: The State Government should amend the introduction to Domain 1 to emphasise the need for more safe, affordable, accessible housing options for people with disability so they have a genuine choice about where to live and with whom.**

**Recommendation 29: The State Government should include outcomes and measures in the State Plan on providing early support to prevent homelessness, whilst also improving responses to homelessness amongst people with disability. Proposed outcomes could include:**

* **People with disability at risk of homelessness receive early support with a view to preventing homelessness.**
* **People with disability who are homeless or at risk of homelessness can access disability-informed and responsive homelessness/housing services and support, and suitable (and accessible) emergency and crisis accommodation as required.**

**Recommendation 30: The State Government should include outcomes and measures in the State Plan on phasing out segregated housing and forced shared living arrangements and investing in a range of alternative accessible housing options.**

**Recommendation 31: The State Government should reword the ‘What we want’ section in Domain 2 to replace ‘A South Australia where all people with disability benefit from inclusive education experiences…’ to ‘A South Australia where all people with disability have genuine access to mainstream inclusive education...’**

**Recommendation 32: The State Government should co-design the State Plan’s outcomes and measures with respect to inclusive education, alongside students with disability and their families, disability advocacy and peer/representative bodies, the Department for Education and other relevant stakeholders.**

**Recommendation 33: The State Government should amend the State Plan to include measures regarding the number of segregated schools, the number of segregated classrooms in mainstream schools, and the number and proportion of students with disability receiving an education in each of these segregated settings. This should be coupled with an outcome that sets an ambitious, timebound target for the implementation of a fully inclusive education system, whereby all children can attend their local mainstream school and learn alongside their peers.**

**Recommendation 34: The State Government should amend the State Plan to include a measure regarding the number of students with a disability receiving an education in mainstream schools.**

**Recommendation 35: The State Government should amend the State Plan to include measures about the extent to which available funding and resources are meeting the needs of students with disability.**

**Recommendation 36: The State Government should amend the State Plan to include a measure about the number of initiatives supporting high school students with disability to transition to higher education and/or employment.**

**Recommendation 37: The State Government should amend the State Plan to include additional measures (and targets) with respect to overall employment outcomes for people with disability. This could include an increase in the employment rate of people with disability, a reduction in the unemployment gap, and the decline in the number of people with disability working at Australian Disability Enterprises.**

**Recommendation 38: The State Government should amend Priority Area 4 in Domain 2 to: ‘Access to inclusive employment opportunities.’ The following outcome should be added: ‘All state authorities are inclusive and accessible employers for people with disability.’ The focus of measure 4.2 should shift to ensuring that workplace culture, policies, processes, practices and physical environment are inclusive and accessible.**

**Recommendation 39: The State Government should change the wording of Priority Area 5, Domain 2, from ‘Supportive environments’ to ‘Inclusive environments.’ Amendments should also be made to measures 5.1 and 5.2, to specify that they both apply to all state authority workplaces and learning environments.**

**Recommendation 40: The State Government should amend the State Plan to include a target for the employment of people with disability in the South Australian public service of at least 8%.**

**Recommendation 41: The State Government should amend the State Plan to include an additional measure on the number of initiatives that build the capacity of mainstream businesses/organisations to become more inclusive employers.**

**Recommendation 42: The State Government should amend the State Plan to add an additional measure under Priority Area 4 in Domain 2 on how many people with disability are represented on government boards or in parliament.**

**Recommendation 43: The State Government should revise the State Plan to include an outcome and measure related to the number of state authorities that have a standing advisory group of people with disability, and the number of matters on which they have provided advice.**

**Recommendation 44: The State Government should amend the State Plan, under Priority Area 1 of Domain 3, by adding qualitative measures that assess whether people with disability find community supports and services to be inclusive, accessible and responsive to their needs.**

**Recommendation 45: The State Government should place all outcomes and measures related to independent advocacy under Domain 3 of the State Plan.**

**Recommendation 46: The State Government should refer to ‘independent advocacy’ throughout the State Plan, rather than simply ‘advocacy.’**

**Recommendation 47: The State Government should amend the outcome for Priority 2, Domain 3 to ensure it is worded in a strength-based way and reflects the need for different types of advocacy. For example, ‘The rights of people with disability are adequately protected and promoted through individual, independent advocacy; representative/peer group advocacy; and systemic advocacy.’**

**Recommendation 48: The State Government should amend Domain 3 of the State Plan to include outcomes and measures on met and unmet demand for independent advocacy services for people with disability. This could include the number of people with disability on waiting lists for advocacy services, number of services available, number of clients supported and number of people unable to access services when needed.**

**Recommendation 49: The State Government commit to independent advocacy funding, in line with the New South Wales model. This should include three funding streams for organisations to provide individual, representative/peer group, and systemic advocacy. The State Government’s commitment could either be written into the State Plan itself or could be announced as a separate measure to support implementation of the State Plan.**

**Recommendation 50: The State Government should ensure independent advocacy services are available across the whole state and specialist services for groups such as First Nations people, people from culturally and linguistically diverse backgrounds, people in closed systems, and people with complex communication needs are funded in all three streams.**

**Recommendation 51: The State Government should revise the introductory text to Domain 4 to include more context about the specific health needs that people with disability may experience.**

**Recommendation 52: The State Government should revise Priority Area 1, under Domain 4, to include an additional measure that captures whether people with disability find health infrastructure inclusive and accessible.**

**Recommendation 53: The State Government should add a new measure to the State Plan under Priority Area 3, Domain 4, relating to whether people with disability feel that health supports are meeting their needs.**

**Recommendation 54: The State Government should reword Measure 3.2, under Domain 4, to align with the outcome of meeting the needs of people with disability. It should focus not on whether procedures and guidelines ‘recognise people with disability,’ but whether they uphold the rights of people with disability, address the barriers they face, and respond to their needs.**

**Recommendation 55: The State Government should revise Priority 3, Domain 4, to include a measure that captures whether supports and pathways are meeting the needs of people with disability.**

**Recommendation 56: The State Government should reframe second Outcome under Domain 4 to shift away from knowledge and understanding to accessibility and responsiveness. For example, ‘Our healthcare system is inclusive and accessible and responds to the needs of people with disability.’**

**Recommendation 57: The State Government should add a new measure to Outcome 2, under Domain 4, which captures the perspectives of people with disability as to whether the healthcare system is inclusive, accessible and responsive to their needs.**

**Recommendation 58: The State Government should revise the State Plan to include a priority area (with an outcome and measures) about growing the health and disability workforce, particularly in regional areas.**

**Recommendation 59: The State Government should revise the State Plan to include a measure on initiatives to build the capacity of staff working in health (including mental health), such as disability inclusion training.**

**Recommendation 60: The State Government should acknowledge recommendations of the Disability Royal Commission into Violence, Abuse, Neglect and Exploitation Against People with Disability under Domain 5 and commit to implementing its recommendations.**

**Recommendation 61: The State Government should amend the State Plan by expanding all outcomes and measures relating to the criminal justice system in Domain 5 to also include the civil law system. These should cover targeted knowledge, understanding and upholding rights; access to adequate support and advocacy; and consultation, collaboration and co-design with respect to all areas of reform.**

**Recommendation 62: The State Government should expand the first outcome under Domain 5 as follows: ‘Emergency responders and all actors within the criminal justice system understand and support people with disability and uphold their rights throughout all stages of the justice process.’**

**Recommendation 63: The State Government should revise the State Plan Domain 5: Justice to include a broad definition of ‘the criminal justice system’ that encompasses all relevant actors (including police, advocates, lawyers, and courts).**

**Recommendation 64: The State Government should add additional measures under Priority Area 1, capturing whether people with disability feel that a) justice and legal workers understand disability and are inclusive in their interactions with people with disability and b) emergency responders are equipped with the knowledge and skills to confidently support people with disability.**

**Recommendation 65: The State Government should revise Domain 5 to include an outcome and measure on disability inclusion training, developed and delivered by people with disability, for all actors in the justice system (police, courts, corrections etc) as well as emergency services.**

**Recommendation 66: The State Government should expand Outcome 5 to ‘People with disability can access effective, inclusive and responsive safeguarding supports and services.’**

**Recommendation 67: The State Government should include outcomes and measures in the State Plan on preventing (and improving responses for people who have experienced) domestic, family and sexual violence. Measures should assess progress with respect to each Priority Group.**

**Recommendation 68: The State Government should amend the State Plan to include a measure about the extent to which DRC recommendations regarding domestic, family and sexual violence have been implemented.**

**Recommendation 69: The State Government should amend Measure 5.3 to remove the term ‘to support safeguarding,’ so the measure reads as follows: ‘Total number and type of authorised and unauthorised restrictive practices used.’**

**Recommendation 70:** **The State Government should include an outcome on reducing the number of parents and children with disability involved in child protection processes, and the number of children with disability in out of home care. Measures could include how many parents with disability are engaged with the child protection system; how many children with disability are involved in child protection processes; and the proportion of children with disability involved in child protection processes that are placed in out of home care.**

**Recommendation 71: The State Government should include an outcome in the State Plan on the accessibility and inclusiveness of information and support available for families engaged in the child protection system. Measures should include the number of information sources available in a range of accessible formats, including Easy English; the number of inclusive support services available for parents with disability; and the proportion of people with disability reporting that they were able to access inclusive information and support.**

**Recommendation 72:** **The State Government should include an outcome in the State Plan on increasing the skills, knowledge and understanding of staff working in family support and child protection with respect to supporting parents and children with disability, including those with intersecting identities. A measure should be included on the number and proportion of family support and child protection staff receiving training on disability inclusion and intersectionality.**

**Recommendation 73: The State Government should expand Outcome 2, under Domain 5, to: ‘The safety and rights of people with disability during emergencies are prioritised.’ The accompanying measures should be expanded to consider the effectiveness of resources, supports and systems from the perspective of people with disability.**

**Recommendation 74: The State Government should adequately resource the State Plan to ensure that state authorities can fully implement their obligations to co-design, consult, implement and report in a way that ensures genuine outcomes for people with disability as intended by the legislation.**

**Recommendation 75: The State Government should amend the State Plan to commit the State Government to establishing a Grants SA funding stream open to local Councils to provide financial assistance for implementing DAIP actions, such as modifications to buildings or websites, training for staff, and support to set-up and run local advisory or co-design groups to draw on the experiences and insights of the disability community.**

**Recommendation 76: The State Government should commit specific resources to DAIP implementation in regional areas, particularly with respect to accessibility upgrades.**

**Recommendation 77: The State Government should consult with state authorities about which support and guidance they need to develop and implement strong, action-oriented, outcomes-focused DAIPs. The State Government should invest adequate time and resources into providing the support and guidance requested.**

**Recommendation 78: The State Government should work with an Implementation Advisory Group of people with disability (such as the Disability Minister’s Advisory Group) to oversee implementation and review of the State Plan and provide advice and guidance to State Government.**

**Recommendation 79: The State Government should develop mechanisms to ensure that the State Plan can have emerging issues added and addressed in real time.**

**Recommendation 80: The State Government should consider developing an interactive dashboard, updated quarterly or biannually, to monitor and view progress on State Plan implementation in real time.**

# Introduction

JFA Purple Orange (JFAPO) welcomes this consultation into South Australia’s draft State Disability Inclusion Plan 2025-2029 (‘the Plan’). We recognise the considerable work that has gone into its development and we are grateful for the opportunity to provide feedback. We hope our recommendations provide clear, practical guidance on how the Plan could be further strengthened.

Our submission will begin by presenting our Model of Citizenhood Support, which we believe could serve as a useful lens with which to review the draft Plan. We will then set out key components of the legal and policy framework that underpin the Plan and should inform its implementation. These comprise the United Nations Convention on the Rights of Persons with Disability (‘the UNCRPD’), *Australia’s Disability Strategy 2021-2031* (‘ADS’)and the final report of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (‘the DRC’).

We will suggest some overall considerations for the Department for Human Services (‘DHS’) to keep in mind when reviewing the draft Plan: the need for a stronger overall commitment to co-design; the importance of using inclusive, respectful language; the need for inter-agency collaboration to maximise the impact of the Plan; and the pending introduction of Foundational Supports by the Commonwealth Government.

We will then suggest introducing two new sections towards the start of the Plan: a vision statement and high-level commitments for all state authorities. The idea behind a vision statement (co-designed alongside people with disability) is to ensure that all state authorities have a clear, shared understanding of what they are working towards. It would also be helpful for the disability community to understand what is driving the actions of state authorities in this space.

We suggest adding high-level commitments in the Plan, as there are multiple cross-cutting considerations that all state authorities should have in mind when developing and implementing all aspects of their Disability Access and Inclusion Plans (‘DAIPs’). It does not make sense to slot each of these within the five Domains, as they apply across them all. Our suggested high-level commitments are: involvement of people with disability in decision-making; accessible communication and information; universal design; intersectional approaches; inter-agency collaboration; procurement policies; employment of people with disability; and effective data and reporting.

It is critical to use inclusive and respectful language and terminology throughout the Plan. We have some concerns with the descriptions of the Priority Groups, as well as the names of the Domains. We will therefore make some suggestions as to how these could be reframed using a rights- and strengths-based approach.

Finally, we will explore each of the Domains in detail, offering suggestions as to how the outcomes framework could be strengthened. The outcomes framework must be strong if the intent of the Plan is to be realised. In working through the Domains, several themes emerged. Firstly, many of the outcomes lack ambition. For example, they refer to key stakeholders having knowledge about disability, but do not call on state authorities to take meaningful action to improve accessibility and inclusion. The first State Plan should have already led to increased knowledge and understanding about disability inclusion. This second Plan should go beyond knowledge to action.

Secondly, the Plan does not include qualitative measures that capture the perspectives and experiences of people with disability. It is disappointing that the Plan proposes to measure progress in achieving more inclusive attitudes, services, policies and practices without asking people with disability themselves. The mere presence of a policy or service, and even its use by the disability community, does not give any insight into its quality, inclusiveness or impact.

Thirdly, critical gaps remain in the draft Plan in respect to the DRC’s vision of a society free from violence, abuse, neglect and exploitation against people with disability. Concerningly, the Plan is silent on ending segregation in all its forms, including in education, housing and employment. The final report of the DRC signalled a genuine shift in disability policy and a real step forward for Australia to create an inclusive society free of stigma, abuse and segregation. However, the disability community is yet to see any real action or solid commitment from state and territories or the Commonwealth Government. We sincerely urge DHS to review the DRC’s recommendations as they relate to South Australia (“SA”) and incorporate these into the Plan. Failing to do so would take us backwards, rather than paving the way forward.

We are regularly contacted by local Councils and State Government Agencies to provide advice and support with developing and implementing their DAIPs, both directly and through a JFA Purple Orange-led Community of Practice for Councils that promotes inclusive employment. These conversations have strongly indicated that individuals within Councils and State Government Agencies are eager to develop strong, meaningful DAIPs that will result in positive outcomes for people with disability. However, we are often told (particularly with respect to Councils) that drive and commitment from internal leadership is lacking. Further, responsibility for access and inclusion often sits with one or two individuals who work quite separately from the rest of their Council/Agency. In order to secure commitment from Council and State Government staff at all levels and across all teams, it is vital that the State Plan models strong leadership, provides clear guidance, requires concrete commitments in all DAIPs, and holds state authorities accountable for achieving progress.

Please note that we refer throughout the submission to recent amendments to the *Disability Inclusion Act 2018* (SA). These amendments are not yet reflected in the Act itself, as while the *Disability Inclusion Review Recommendations Amendment Bill 2024* (SA) passed both Houses of Parliament, it is still awaiting assent. This is just a formality, so it is important that these amendments are reflected in the Plan. JFA Purple Orange are proud to have worked with all political parties to secure many of these amendments; we therefore have detailed understanding of their origins and purpose.

# Citizenhood

The Model of Citizenhood Support[[1]](#footnote-1) sets out a framework for how people can be supported to build their chances of a good life and maximise their *Citizenhood*. A good life largely depends on the availability of life chances – the assets and opportunities available to a person. Based on this Model, the purpose of the Plan should be to build the life chances of people with disability, so they are enabled to take up, or remain in, valued roles in mainstream community life that are contributory, meaningful, and fulfilling. The Model asserts that our life chances comprise four different, interrelated, types of assets we can call upon, termed the Four Capitals. We believe these provide a sound framework to underpin the Plan, as well as outcome measures to ensure accountability for impact and a genuine return on investment. Below, we give a brief summary of each of the Four Capitals.

1. **Personal Capital**

The first of the Four Capitals refers to the person’s belief in their own value, their gifts, their capacity to grow, to take up valued roles, to see hope in their future, to have jurisdiction over their own decisions, and take purposeful actions. It is Personal Capital that gives you the belief to apply for a job, to ask someone out on a date, to create a sense of home, to take care of your health, and to take a chance on the things that are important to you.

We argue this should be a central outcome for the Plan. Given the tyranny of low expectations that have dogged the disability community for generations, the Plan should enable people with disability to reclaim their right to a fair go at what life has to offer, imagine their valued place in mainstream community life, and see themselves for their strengths and gifts and not for their deficits. This can be measured easily using a few variables that capture how people see themselves and how it changes over time.

1. **Knowledge Capital**

The second of the Four Capitals refers to a person’s knowledge and skills. It contemplates how a person is supported to make the best use of the skills and knowledge they have, and how they are supported to grow new skills and knowledge. The Plan includes a ‘capacity-building’ element, particularly under Domain 3: Support. Often capacity building has a therapeutic character (to be clear, we are not referring to genuine therapy supports here, but other types of supports that can take on a therapeutic character). These can be very important investments, but only if we contemplate how the benefit might be understood. Therefore, we argue investment in such endeavours can best be measured by the extent to which it grows authentic Knowledge Capital that moves people closer to assuming valued roles. Otherwise, capacity-building supports are at risk of becoming too focused on trying to fix a person’s disability instead of trying to address the consequences of disability. Outcome measures based on Knowledge Capital in support of Citizenhood can provide clarity on this.

Meanwhile, it is not unusual for people with disability receiving service provision to lose skills and knowledge. For all of us, the retention of our skills and knowledge is supported by us *using* our skills and knowledge. Unfortunately, it is not unusual in disability services for the service staff to do things *for* the person rather than *with* the person. This is often because it is quicker and more convenient. So, again hopefully with the best of intentions, the service provider inadvertently erodes what the person knows and can do by not giving the time and attention to supporting the person to be centrally involved in those things.

Translating this into outcome measures, DHS might contemplate how to measure the extent the Plan converts into the growth in, and defence of, knowledge and skills that can maintain and enhance people with disability’s knowledge and skills and support them in the take up of valued roles.

1. **Material Capital**

The third of the Four Capitals refers to the tangible things in a person’s life. It includes the things a person has, owns, or is in control of, and also the public things the person can access, like public transport, shopping malls, beaches, community clubs, employment, education, and so on.  The Plan does acknowledge these things, particularly in Domain 1: Access, Domain 2: Opportunity and Domain 4: Wellbeing.

There are two important things that could be used to assess success in building Material Capital. The first is the extent to which the Plan can defend and advance people with disability’s *personal* Material Capital. For example, does the goal or action assist the person to move away from poverty (the relative absence of *personal* Material Capital) into waged employment where the person has disposable income on the same basis as most non-disabled Australians?

The second is the extent to which goal or actions assists a person to use mainstream community resources – *public* Material Capital – on the same basis as most non-disabled Australians. This should not be as a ‘community tourist’ or in isolation. Often service providers take people into the community but do not support genuine participation or interaction. A person might be taken to a café and sit in the corner while a support worker transacts the order and is the only one to speak to staff or other customers present. As such, the person can be said to be *in* the community but is not a genuine *part* of community life. These are all elements that can be measured in the Plan, with the goal of increasing social and economic participation.

1. **Social Capital**

The fourth of the Four Capitals refers to the people in our lives. As humans we are interdependent, we give and we take, we live in community where we take up roles that bring value to others, and in turn we gain value from the roles others take up. But Social Capital is not just a marketplace of mutual utility. Social Capital is about the relationships that have importance in our lives. In the many workshops JFA Purple Orange has run over the years exploring the nature of a good life, themes like *family* and *friends* always feature prominently. This taps into the importance of what it means to *belong*, and this sense of belonging is at the heart of social participation.

The Plan should both assist people with disability to retain connection with the people in their lives who are important to them, and to enable them to make new social connections, particularly if the person with disability has low Social Capital. This is important because many people with disability will likely have levels of Social Capital where the only people in their lives, other than core family and service providers, might be other people with disability. It is a cliché of otherness to assume that the only friends a disabled person can have are other disabled people.

Outside of family, the most meaningful relationships in our lives – partners, best friends, close friends, sincere acquaintances – begin with meeting each of these people for the first time. If that first encounter does not happen, nothing else can follow. This can be a key outcome measure for the Plan; the extent to which it assists people with disability into new connections and relationships, thereby growing their Social Capital.  To explore the Four Capitals in greater detail, please access the full Model of Citizenhood Support paper [here](https://purpleorange.org.au/what-we-do/library-our-work/model-citizenhood-support).

1. **Embedding Citizenhood in the Plan**

We strongly believe governments can initiate a fresh approach in the Plan by using the Citizenhood framework to measure outcomes based on quantifying the extent to which they are advancing the Four Capitals and supporting people with disability into valued roles in community and economic life. A set of example measures are set out in Section 10 of the 2013 edition of the Model of Citizenhood Support available [here](https://purpleorange.org.au/what-we-do/library-our-work/model-citizenhood-support).

**Recommendation 1: The State Government should use the Model of Citizenhood Support to inform the design of the State Plan and measure its impact.**

# The legal and policy framework

## The UNCRPD

The current draft Plan states that ‘In South Australia, the *Disability Inclusion Act 2018* (SA) is our vehicle to ensuring the principles outlined in the UNCRPD underpin the development and delivery of policy relating to people with disability’[[2]](#footnote-2). Indeed, the *Disability Inclusion Act 2018* (SA) was amended in 2024 to specifically require the State Plan to contain provisions ‘setting out whole of Government policies and strategies for giving effect to the principles and purposes of the UNCRPD, as well as any other relevant international human rights instruments affecting people with disability’[[3]](#footnote-3).

Whilst the *Disability Inclusion Act 2018* (SA) furthers the principles and purposes of the UNCRPD, it does not specifically give effect to the SA Government’s obligations pursuant to the Convention. We believe that the Plan should be the vehicle for upholding the rights of people with disability under the Convention, with respect to the each of the topics it addresses (e.g. education, employment, health, safety, access to supports, physical accessibility, justice and rights etc).

**Recommendation 2: The State Government should review and strengthen the State Plan’s outcomes framework to ensure it gives effect to the South Australian Government’s obligations under the UNCRPD to respect, protect and promote the rights of people with disability.**

## Australia’s Disability Strategy

The draft Plan also comprises SA’s primary response to *Australia’s Disability Strategy 2021-2031.* The outcomes it seeks to achieve, therefore, should reflect – and further – the agreed national priorities. As discussed below, the Plan is organised around five key ‘Domains’ which are somewhat linked to the seven outcome areas of the ADS. We will explore this further below, calling for even greater alignment. Not only would greater alignment result in more consistency, it would also bring about practical benefits as common goals and indicators allow for comparable measurement, shared learning between jurisdictions, and a coordinated push on national priorities.

The current Plan lacks the clarity of vision, leadership, commitment to inter-agency collaboration and precision of measurement necessary for strong government accountability. The ADS’s embrace of genuine co-design, too, is not adequately reflected in the Plan.

**Recommendation 3: The State Government should review and strengthen the State Plan’s outcome framework to ensure it gives effect to the South Australian Government’s commitments under the ADS.**

## The Disability Royal Commission

The DRC also provides important context for the Plan. It is vital that its findings and recommendations are meaningfully reflected in the Plan, to ensure they are acted upon by all state authorities.

We are pleased to see that the Plan contains references to the principles of choice, control and freedom from abuse. It also somewhat supports measures to strengthen safeguards in supports and services (like promoting zero tolerance of abuse in disability care settings and improving incident responses). This is in line with the DRC broad vision of reducing violence, abuse, neglect, and exploitation. However, critical gaps remain in fully realising the DRC’s vision of a society free from violence and discrimination against people with disability. A major gap is the absence of any commitment to end or move away from all forms of segregation that can lead to violence, abuse, neglect and exploitation.

The DRC was clear that many instances of violence, abuse and neglect occur in segregated environments (e.g. institutional residences or ‘group homes’, ‘special’ schools, and sheltered workshops or employment settings[[4]](#footnote-4)) and recommended a staged transition away from these models over time[[5]](#footnote-5). Over many generations, Australia has intentionally built arrangements that segregate many people with disability in housing, education and employment, making them vulnerable to harm. The Plan does not directly address, for example, the future of large congregate care settings or whether South Australia will move toward individualized community living arrangements (though it does encourage inclusive housing development). Nor does it indicate any commitment to shifting away from segregated school systems, group homes, or segregated employment settings (‘Australian Disability Enterprises.’). It is time that we unite to undo these settings, and this must start with genuine leadership from all tiers of government. This will be addressed in more detail when we consider the Plan’s outcomes framework below.

**Recommendation 4: The State Government should amend the State Plan to ensure it aligns with the recommendations of the Disability Royal Commission, particularly with respect to moving away from segregation (e.g. in housing, education, employment) as this can lead to violence, abuse, neglect and exploitation of people with disability.**

When the state and federal governments released their responses to the DRC in late 2024, we, alongside the disability community, were exceptionally disappointed by the lack of urgency, commitment and specificity. There needs to be a time-bound roadmap for implementing the DRC recommendations, and this must align with implementation of the Plan. While the SA Government has indicated it will have a separate reporting process for DRC recommendations, ideally these processes should inform and support each other. It might be beneficial for the Plan’s annual report to include a section on implementation of DRC recommendations that are relevant to SA, to explicitly bridge the two. This would increase transparency, accountability and confidence, and reinforce that the Plan is part of the broader reform agenda stemming from the DRC.

**Recommendation 5: The State Government should develop a time-bound roadmap for implementing the Disability Royal Commission’s recommendations and ensure that the State Plan aligns with this. The State Government should report on DRC implementation in each State Plan annual report.**

# Overall considerations

## Co-Design

In mid-2024, following a statutory review of the *Disability Inclusion Act 2018* (SA), JFA Purple Orange worked extensively and collaboratively with all sides of politics to achieve bipartisan support for amendments to the Act. Perhaps the most significant amendment was the formal embedding of co-design and consultation. This was a direct realisation of JFA Purple Orange’s recommendation back in 2019 that co-design (not just consultation) be a requirement for developing the State Plan. It is an example of the system responding to feedback that “nothing about us without us” must be the rule, not the exception.

This amendment explicitly requires the Minister to “seek the views of people with disability”[[6]](#footnote-6) in the operation of the Act and in developing or reviewing the State Plan. It also mandates that the Minister establish a committee to advise on the Plan’s preparation and review, “taking into account the principles of co-design”[[7]](#footnote-7). We are disappointed that the body established for this purpose – the Disability Minister’s Advisory Council – was not given a meaningful opportunity to advise on the draft Plan and was certainly not involved in any co-design process. We strongly advise the State Government to adopt a robust co-design process when revising the Plan, working with the Disability Minister’s Advisory Council.

The *Disability Inclusion Act 2018* (SA) s9(1) was also amended to include the following principle, which is to be observed in the operation, administration and enforcement of the Act: ‘people living with disability from a range of lived experiences, and their families and representatives, have a right to participate in the design and delivery of inclusive policies and programs including, as appropriate, through co-design, consultation or other processes.’ This extends beyond the development of the Plan itself, to also include the development and implementation of DAIPs.

The DRC also underscored the importance of involving people with disability in all policy design affecting them[[8]](#footnote-8), so SA’s legislative changes are very much aligned with that ethos. Co-design also aligns with Australia’s obligations under Article 4 (3) of the UNCRPD.

**Recommendation 6: The State Government should adopt a robust co-design process when revising the Plan, working with the Disability Minister’s Advisory Council that was established for this purpose pursuant to the *Disability Inclusion (Review Recommendations) Amendment Act 2024* (SA).**

### Stronger commitment to co-design

While there are references to people with disability participating in working groups and committees in the Plan, and phrases such as “being involved in”, “informed by” or “consulted with” are included, co-design is not specifically mentioned.

‘Collaboration and consultation’ are included as Priority Areas under Domains 1 (Access) and 5 (Justice). We strongly suggest expanding these to ‘collaboration, consultation and co-design.’ We then suggest adding two further measures: ‘total number of co-design processes undertaken to make decisions on matters affecting people with disability’ and ‘total number of people with disability represented on co-design groups to make decisions on matters affecting people with disability.’

We also suggest including this Priority Area (‘collaboration, consultation and co-design’) and the suggested additional measures to Domains 2 (Opportunity), 3 (Support) and 4 (Wellbeing). People with disability must be included in decision-making with respect to *all* matters that affect their lives, across all five Domains. For this reason, we have also suggested below (under ‘High-level Commitments’) that the Plan include an overarching commitment for all state authorities to involving people with disability in decision-making.

**Recommendation 7: The State Government should amend the State Plan to include a priority area on ‘collaboration, consultation and co-design’ in each of the five Domains. This should be accompanied by additional measures, such as: ‘total number of co-design processes undertaken to make decisions on matters affecting people with disability’ and ‘total number of people with disability represented on co-design groups to make decisions on matters affecting people with disability.’**

### Capacity-building in co-design

It is critical not only that the Plan makes a strong commitment to co-design, but also that all state authorities are equipped with the skills and resources to undertake co-design processes that genuinely include people with disability in decision-making. We are concerned that many of the processes that governments currently refer to as co-design fall well short of best practice and do not include active involvement of people with disability in decision-making. We were disappointed to learn that despite the legislative changes mentioned above, even the draft Plan itself was not co-designed.

The SA Government must invest in capacity building in co-design for all state authorities. This will improve the quality of DAIP development and implementation and will help to ensure that the actions taken by state authorities respond effectively and appropriately to the needs of the local disability community.

DHS (and other state authorities) may find our *Guide to Co-Design with People Living with Disability*, which was itself co-designed, helpful in considering the essential steps required in undertaking genuine co-design processes. It is available via our [website](https://purpleorange.org.au/what-we-do/library-our-work/guide-co-design-people-living-disability).

**Recommendation 8: The State Government should amend the State Plan to include an outcome on building the skills and capacity of all state authorities to undertake robust co-design processes with the disability community.**

## Language use throughout the Plan

While it is pleasing to see mention of person-first language and the Social Model of Disability in the Plan, some of the language used should be amended to better reflect the contemporary preferences of the disability community. There are also instances of non-inclusive language use that could be interpreted as disrespectful in the Plan - these must be addressed before the Plan is released.

For example, under Domain 1: Access, the introduction states that ‘People with disability are ever present in our community but most do not enjoy full participation in it.’ Although this could intend to convey the need for increased access and inclusion and reduced segregation, it could also be interpreted as othering: people with disability are ever present, but not a part of the community. This could be amended to something like, ‘While one in five Australians have a disability, many experience barriers to full participation in their communities.’

Another concerning example of language use is the reference to ‘understanding and acceptance’ in Domain 1, Priority Area 2. The notion of ‘acceptance’ of people with disability is offensive and does not align with the goals of inclusion. This is also not an ambitious outcome – we must go beyond ‘understanding’ to making changes that result in greater inclusion. We suggest replacing this Priority Area heading with ‘inclusive attitudes.’

Another example sits within the introductory text to Domain 4 (Wellbeing): ‘[t]here is a belief that health professionals hold the same beliefs and misconceptions about disability as the rest of the community.’ This implies that while the disability community believes this to be true, this is not necessarily the case. We suggest rephrasing this as ‘Some health professionals hold the same beliefs and misconceptions.’

Further examples of inappropriate language use are provided when we discuss the Outcomes Framework below.

**Recommendation 9: The State Government should revise the State Plan to ensure inclusive, respectful and rights-based language is used throughout. Adopting a co-design process to revise the draft Plan would ensure that decisions on language are made by people with lived experience of disability, reducing the risk of inappropriateness and offence.**

## Inter-Agency Collaboration

Generational reforms – the kind the DRC and the disability community have been calling for and we hope the Plan can help to deliver – require sustained political will. Issues of importance for the disability community often cross portfolio boundaries, requiring multiple ministers and agencies to cooperate. The DRC spoke of how governments need to improve how they coordinate disability-related reforms (given how many agencies are involved).[[9]](#footnote-9)

We suggest below that ‘inter-agency collaboration’ be included in the Plan as a high-level commitment for all State Government Agencies. We also suggest adding specific measures to the Plan that require State Government Agencies to work together (e.g. state-wide policy or legislative reform) where this would strengthen progress towards outcomes.

**Recommendation 10: The State Government should amend the State Plan Outcomes Framework to include measures that require inter-agency collaboration (e.g. policy or legislative reform) where this would strengthen progress towards outcomes.**

## Foundational Supports

The DRC heard from people who fall through cracks, such as those who are ineligible for the NDIS but still need help at home or in the community, or people exiting jail or institutional care without adequate supports. The Plan speaks generally to no one being ‘left behind’ but is short on specifics for these scenarios.

There is no mention of Foundational Supports within the Plan. Foundational Supports will play an essential role in ensuring the availability of accessible and inclusive disability supports for everyone, whether they have access to the NDIS or not. Given the key role state governments will play in the delivery of these supports, beginning at the end of this year, this responsibility should be mentioned in the Plan.

While we understand further work is being undertaken on designing Foundational Supports for individuals who cannot access NDIS or who need help that NDIS does not provide, we believe this must be acknowledged in the Plan. When the design of these supports is finalised, the Plan may need to be updated. We are supportive, of course, of Foundational Supports and have consistently asserted that governments must restore or maintain programs in areas like housing support, community transport, and therapy, rather than assuming ‘NDIS does it all’.

While we don’t envy the State Government’s task of designing a Plan while so much uncertainty remains, it is important that the Plan provides some information about the upcoming introduction of Foundational Supports as this will affect its implementation.

**Recommendation 11: The State Government should amend the State Plan to:**

* **Acknowledge that Foundational Supports will be rolled out within the life of the Plan;**
* **Commit the State Government to updating the Plan through a co-design process once Foundational Supports has been designed, to ensure they align; and**
* **Set out a State Government commitment to implementing the Plan in a way that strengthens the rollout of Foundational Supports and provides the best possible support to people with disability who cannot access the NDIS or who need help that the NDIS cannot provide.**

# Vision Statement

Including a vision statement at the start of the Plan would help to set a strong agenda and clear direction as to where SA is headed in terms of disability inclusion. This would be valuable both for state authorities and the South Australian disability community.

It is vital that a vision statement builds on the social model of disability and takes a strength- and rights-based approach. It should reflect the benefits of achieving a more inclusive and accessible community for everyone, not just people with disability.

A vision statement for the Plan should be developed by people with disability. We recommend bringing together a co-design group of people with diverse experiences of disability and their supporters, including advocacy and peer/representative bodies, to draft the statement.

**Recommendation 12: The State Government should co-design a rights-based vision statement to be included in the State Plan.**

# High-level commitments

The draft Plan provides an outcomes framework which requires specific state authorities to take action and report on measures with respect each outcome. While some of these priority areas are specified as applying to all state authorities, we believe that the Plan would be strengthened by including some additional high-level commitments that all state authorities must fulfil. These could be set out early in the Plan, to make it clear that they apply to the interpretation and implementation of the entire Plan.

We have identified a list of cross-cutting topics that relate to all state authorities across one or more Domains. State authorities are already obligated to address some of these pursuant to the *State Disability Inclusion Act 2018* (SA).[[10]](#footnote-10) All of these proposed commitments would serve as a valuable lens for state authorities to use when developing and implementing their DAIPs. Our proposed high-level commitments include:

1. **Involvement of people with disability in decision-making**

All state authorities must involve people with disability in decision-making on matters that affect their lives, including through co-design processes. This includes decision-making about laws, policies, services, processes and projects.

1. **Accessible communication and information**

All state authorities must ensure that everyone can understand the information they provide, both internally and externally. This involves writing in clear and simple language; using accessible and inclusive communication methods; providing information in multiple formats (such as Easy English, large print, audio, hard copy etc); and incorporating assistive communication technologies.

1. **Universal design**

All state authorities must use universal design principles when designing (or making changes to) the built environment, facilities, services and events. This helps to ensure universal access for all, not only people with disability.

1. **Intersectional approaches**

All state authorities must commit to better understanding how different aspects of a person with disability’s identity can intersect, leading to unique forms of discrimination and marginalisation. All state authorities must include actions in their DAIPs that will address these forms of intersectional discrimination and marginalisation.

1. **Inter-agency collaboration**

All State Government agencies must collaborate across government, where relevant, to achieve the outcomes of the State Plan. This would help to ensure a consistent approach and reduce complexity for people with disability who need to engage with multiple service systems.

1. **Procurement policies**

All state authorities must develop and implement policies that promote disability access and inclusion when procuring goods and services and awarding grant funding. For example, they could require businesses/organisations to have a Disability Action Plan; to employ a certain percentage of people with disability; to demonstrate they are providing employment opportunities for people with disability in open, inclusive and accessible settings; or to meet accessibility standards.[[11]](#footnote-11)

1. **Employment of people with disability**

All state authorities must strengthen their policies and practices to ensure their workplaces are accessible and inclusive for all, and build staff capacity in disability access and inclusion. All state authorities must also commit to an employment target of at least 8% for people with disability (see discussion below under Domain 2).

1. **Effective data and reporting**

All State Government agencies must undertake robust data collection and reporting pursuant to the State Plan Outcomes Framework. This is essential to monitoring progress and informing future action.

In setting high-level commitments for all state authorities, it is important for the Plan to include accountability measures to ensure these are acted upon. State authorities should be required to report against progress made against each commitment.

**Recommendation 13: The State Government should amend the State Plan to include high-level commitments that apply to all state authorities, as well as reporting requirements and accountability measures. These should cover cross-cutting issues such as involvement of people with disability in decision-making; accessible communication and information; universal design; intersectional approaches; inter-agency collaboration; procurement policies; employment of people with disability; and effective data and reporting.**

# Intersectionality

We welcome the seven Priority Groups listed in the draft Plan, recognising that the *Disability Inclusion (Review Recommendations) Amendment Bill 2024* (SA) explicitly requires the Plan to set out strategies to ensure that the needs of these groups are properly addressed. In our view, this requirement means that the Plan’s outcomes framework must focus not only on people with disability generally, but also on addressing the specific barriers faced by people from each Priority Group.

We are concerned that the section of the Plan, ‘A spotlight on our seven Priority Groups’ does not include sufficient emphasis on – nor present a sophisticated, nuanced understanding of – intersectionality. For example, when explaining why each of the Plan’s seven priority groups were selected, the only point made with respect to people from culturally and linguistically diverse (CALD) backgrounds is that ‘cultural perceptions, language and other differences can influence understanding and attitudes of disability *by CALD people with disability* [emphasis added].’ This focuses exclusively on CALD people with disability themselves, perpetuating negative stereotypes about knowledge and attitudes towards disability within CALD communities. It does not consider the barriers and issues faced by CALD people with disability with respect to the attitudes and knowledge of the wider population. We recently undertook research into this topic with the CALD disability community across Australia, to inform a community attitudes survey undertaken pursuant to Australia’s Disability Strategy. This confirmed the complexity of the issues faced by CALD people with disability.

We have similar concerns about the simplicity of the descriptions provided for the other six priority groups. These do not sufficiently capture the complexity of the compounding barriers and issues people belonging to these groups face as a result of their intersecting identities. Nor are they drafted in a consistent way, with a clear focus on intersectional disadvantage (some are statements of fact, others are statements of rights, others are observations as to issues faced). There is also no recognition of the fact that people with disability may face additional barriers due to intersectional identities that go beyond the seven Priority Groups (e.g. older people with disability).

We recommend that the description of each Priority Group be revised through a co-design process with lived experience representation from that group.

**Recommendation 14: The State Government should rework the introductory part of the State Plan section, ‘A spotlight on our seven Priority Groups’ to incorporate a more sophisticated, nuanced understanding of intersectionality that recognises the compounding barriers faced by people with intersecting identities.**

**Recommendation 15**: **The State Government should revise the descriptions of all seven priority groups in the State Plan through a co-design process with representatives from each priority group. The descriptions should be rights- and strength-based, with a focus on the barriers experienced by these groups as a result of their intersectional identities.**

We are concerned that beyond the section ‘A spotlight on our seven Priority Groups’, there is little mention throughout the Plan of how the barriers faced by these priority groups should be addressed by State authorities, and how progress should be measured. There is therefore a risk that these priority groups will be overlooked, or referred to in a tokenistic way, when state authorities develop their DAIPs. Nor does the Plan identify the specific issues and barriers faced by members of the various Priority Groups, such as the prevalence of domestic, family and sexual violence (which has a disproportionate impact on women) or issues related to the child protection system (which disproportionately impacts children and families).

Our recommendation above to include ‘intersectional approaches’ as a high-level commitment for all state authorities goes some way in addressing our concerns, as it would require state authorities to consider all priority areas, and subsequent actions in their DAIPs, through the lens of intersectionality (and the seven Priority Groups). However, it is also important that there are specific references to these priority groups in the outcomes framework to ensure that they are genuinely treated as priorities.

Measures that require state authorities to report on a ‘total number of people with disability…’ could require another layer of reporting with respect to each priority group. For example, Domain 1, Priority Area 7, requires reporting on the ‘total number of people with disability serving on committees and working groups…’ An additional measure could be added, such as ‘total number of people with disability from each priority group serving on committees and working groups.’

**Recommendation 16:** **The State Government should revise the State Plan Outcomes Framework to include outcomes and measures that relate to the specific barriers faced by the seven Priority Groups. These should be co-designed with representatives from each priority group.**

We recognise that the terminology used to describe the Priority Groups is derived from the *Disability Inclusion Act 2018* (SA) and the *Disability Inclusion Review Recommendations Amendment Bill 2024* (SA). However, we are concerned about the language used to describe the following group: ‘people with significant intellectual disability or who have high levels of vulnerability due to disability.’ We suggest avoiding reference to ‘vulnerability’ or the ‘significance’ of a person’s disability, as this is disempowering for people with disability and does not align with a strengths-based approach. Further, this description attributes the barriers (‘vulnerability’) experienced by people with disability to their disability, rather than systemic issues. Alternatives (that still align with the legislation) could include ‘people with intellectual disability or people who experience particularly acute barriers to access and inclusion’ or ‘people with intellectual disability or people with disability from particularly marginalised groups.’

**Recommendation 17: The State Government should revise the State Plan by deleting references to ‘vulnerability’ or the ‘significance’ of a person’s disability (in the description of the Priority Group ‘people with significant intellectual disability or who have high levels of vulnerability due to disability’). Alternatives could include ‘people with intellectual disability or people who experience particularly acute barriers to access and inclusion’ or ‘people with intellectual disability or people with disability from particularly marginalised groups.’**

# Domains

We assume that the decision to name each Domain with one word was a stylistic choice. However, we are concerned that reducing such complex topics to one word is an oversimplification that fails to capture the breadth of the issues that each Domain should cover. It is important that each Domain name gives a clear indication of the issues it addresses. At first glance, it appears that the Domains do not cover topics like inclusive attitudes, health, safety, rights, housing, education or employment, which is problematic.

We suggest renaming the Domains to better reflect what they cover, and to better align them with the outcome areas of Australia’s Disability Strategy, the findings of the DRC and the State Government’s obligations under the UNCRPD.

Australia’s Disability Strategy has seven outcome areas and the draft Plan has five. We have combined ‘employment and financial security’ and ‘education and learning’ under the heading, ‘education and employment.’ We believe ‘community attitudes’ can be covered under ‘inclusive homes and communities’.

**Recommendation 18: The State Government should amend the headings of the State Plan’s five Domains as follows:**

1. **Inclusive homes and communities (instead of ‘Access’)**
2. **Education and Employment (instead of ‘Opportunity’)**
3. **Personal and Community Support (instead of ‘Support’)**
4. **Health and Wellbeing (instead of ‘Wellbeing’)**
5. **Safety, Justice and Rights (instead of ‘Justice’)**

# Outcomes Framework

We note that DHS has taken a different approach to structuring the draft Plan, compared to the first State Plan. The current draft includes an outcomes framework, rather than specifying actions that certain state authorities will take. While we understand why this change has been made, the removal of actions in the plan has given rise to some concern within our organisation and the disability community that the Plan lacks leadership and commitment.

We think it would be useful for Plan to include some commentary on why this change has been made and how the new outcomes framework approach is expected to provide better outcomes than the previous approach. We also think that the inclusion of the high-level commitments we have suggested earlier will help to alleviate these concerns.

This section provides our suggestions around how the proposed outcomes framework could be strengthened to further mitigate against these concerns.

## More specific, ambitious outcomes (with targets)

If the current Plan does not include actions, it is imperative that the outcomes framework is strong, clear and ambitious enough to motivate state authorities to commit to meaningful actions in their own DAIPs. As it stands, we are concerned that many of the outcomes in the draft Plan are too general to drive concrete change within and beyond government. Many are phrased as increasing or improving metrics without setting specific numerical targets.

The 2024 consultation report that informed the draft Plan notes that ‘respondents called on both State Government and local councils to be ‘ambitious’ in their targets and ensure steps are taken to demonstrate meaningful improvements across the life of the next State Plan and move away from terminology that does not drive action and change.’[[12]](#footnote-12)

Where applicable, we suggest including specific targets for each Priority Area, so that state authorities know what to strive for and there is something concrete to measure their achievements against. Examples could include ‘reduce the employment gap by X% by 2029’ or ‘100% of new public infrastructure projects to meet universal design standards by 2029’. Clear, targeted outcomes would drive stronger accountability.

**Recommendation 19: The State Government should review each outcome in the State Plan to ensure they are specific enough to drive meaningful change. Where appropriate, outcomes should be framed as specific, ambitious targets with a timeframe.**

## Stronger measures

Most of the outcomes are coupled with only one or two measures, which does not always suffice to address the multi-faceted actions needed to achieve each outcome. Further, there are several measures that refer to a number, rather than a proportion. In our view, most of these numbers do not provide a meaningful measure and we therefore suggest changing these to a proportion. For example, measuring the “total number of inclusive and accessible events, both internal and external, with 50+ people following best practice event management” is not a meaningful measure of the outcome “people with disability are actively participating in accessible and inclusive communities.” The more meaningful measure would be the proportion of events, and then this should be measured against a target. We suggest DHS review each of the outcomes to assess whether the proposed measures will genuinely reflect progress and stimulate positive change.

A reliable way of measuring progress towards accessibility and inclusion is to seek the views of people with lived experience. We therefore recommend adding more measures that reflect the personal experiences of people with disability. At present, we recognise that the Outcomes Framework is limited to collecting quantitative data. We suggest expanding this to include qualitative data from people with disability, which could be captured through surveys, focus groups etc.

**Recommendation 20: The State Government should strengthen and expand the measures included in the State Plan, to ensure they enable clear measurement of progress towards the relevant outcomes. Where appropriate, the State Government should add measures that capture qualitative data about the personal experiences of people with disability.**

# Domain 1: Access (‘Inclusive Homes and Communities’)

As stated previously, we suggest that this Domain be renamed ‘Inclusive Homes and Communities’.

The Plan’s approach to accessibility addresses transportation, the built environment, and the principle of universal design. The main work ahead lies in implementation: updating older infrastructure, ensuring rural areas aren’t left behind, and moving from basic compliance to truly user-centred design. With continued, but more genuine, co-design and monitoring (possibly via the annual reports and an advisory committee), SA can make steady progress towards the goal that the entire community – every building, street, service, and digital space – is accessible to all. This will take time, but the Plan sets a strong foundation to build upon.

The Plan’s community inclusion outcomes broadly align with some of what South Australians with disability say they need: more accessible and welcoming events, cultural activities, sports, and community groups. The main area where work continues is in transforming attitudes and embedding a culture of inclusion so that accessibility is automatic and people with disability are actively included, not just accommodated. Achieving that is a gradual process – involving education, visibility, and interaction – but it will never be achieved without clear direction, expectations or accountability.

## Inclusive events

The Plan only includes one measure regarding inclusive event design and management. The Plan will measure how many major events and festivals have “best practice event management” but does not specify what this means. The consultation to inform the draft Plan included examples of success – e.g., having “quiet hours” at community events for neurodivergent attendees or beach wheelchairs and ramps at some beaches. One concrete initiative that came from the first Plan was the development of an Accessible Events Checklist (with input from JFA Purple Orange) to guide organisers. The new Plan could reinforce usage of that tool and commit to promoting it to more private event organizers, not just government-run events.

Sports and recreation should also be a major focus of inclusive design and management. The consultation to inform the draft Plan acknowledged that despite some “all-abilities” programs, many clubs and sporting activities are still not truly inclusive. Barriers include not just physical access (e.g. inaccessible sports facilities) but also social and financial barriers (like clubs not knowing how to include a person with disability, or the cost of participation). The consultation feedback suggested a few strategies: training for clubs and associations on disability inclusion, emphasising the benefits of inclusive clubs, expanding subsidies (like the Sports Voucher program) to cover more activities or older ages, and ensuring sports venues meet accessibility standards. The Plan only vaguely refers to promoting disability awareness and inclusion, without any detail regarding how.

**Recommendation 21: The State Government should expand the outcome for Priority Area 1, under Domain 1, to include ‘events’, not just ‘communities.’ Greater context should be provided in the introduction to Domain 1 about what best practice inclusive event management involves, including reference to the Accessible Events Checklist.**

## Community Education and Awareness

Changing deep-seated attitudes and culture can be frustratingly slow. The Plan outlines structural and practical changes (which are necessary), but the more nuanced gap is ensuring a genuine culture of inclusion. For example, it is possible to have all the physical adjustments at an event, yet if staff or other patrons are not welcoming, a person with disability might still feel excluded. Some people with disability report feeling like they’re tolerated as an afterthought, not truly included. Overcoming this requires ongoing community education and exposure.

The draft Plan does not explicitly refer to changing community attitudes. It refers rather to ‘understanding and acceptance’ (issues with this terminology are set out above in relation to language use in the Plan) and seeks the following outcome: ‘The South Australian community is aware of and understands the barriers to access and inclusion for people with disability.’ In other jurisdictions, instead of focusing simply on awareness of barriers, plans say they will break them down,[[13]](#footnote-13) “develop positive community attitudes and behaviours”[[14]](#footnote-14) and “build capacity across the community”. [[15]](#footnote-15) The language in the South Australian plan is disappointing and must be strengthened to make it clear that the government is serious about improving community attitudes.

It is also important that the Plan focuses not only on increasing understanding of disability inclusion and improving attitudes in the wider community; it must include specific measures with respect to state authorities.

**Recommendation 22: The State Government should change the wording of Priority Area 2 from ‘understanding and acceptance’ to ‘inclusive communities’ or ‘inclusive community attitudes.’ The outcome should shift its focus from awareness and understanding of barriers to improving community attitudes. For example, ‘The South Australian community understands disability inclusion and demonstrates inclusive attitudes and behaviours.’**

**Recommendation 23: The State Government should amend measure 2.1, under Domain 1, from ‘total number of activities undertaken to promote and profile disability inclusion in the South Australian community’ to ‘total number of activities undertaken to promote disability inclusion and improve community attitudes towards people with disability in SA.’**

**Recommendation 24**: **The State Government should add measures under Priority Area 2, Domain 1, regarding 1) the number of activities undertaken to promote disability inclusion and improve attitudes towards people with disability within state authorities and 2) the impact these have had on the knowledge, confidence and attitudes of staff.**

## Communications and information

The two measures listed in the Plan will provide information about the number of accessible resources developed, and the number of accessible communications services provided. However, these do not fully respond to the outcome: ‘people with disability can find the information they need in the format(s) they need it in.’ We suggest adding another measure that relates to the direct experiences of people with disability in finding accessible information.

**Recommendation 25: The State Government should add an additional measure under Priority Area 5, Domain 1, to capture the direct experiences of people with disability in finding accessible information.**

## Transportation

The outcome with respect to transportation is: ‘people with disability can get to where they need to go safely.’ We are pleased to see there is a measure related to how many people with disability are able to access public transport. However, there is no such measure with respect to access taxis. The issues related to access taxis are complex and cannot be measured according to the number of accessible taxis available (as per measure 6.3). While this number is important, it is vital to capture the experiences of people with disability who need to use access taxis to assess whether they are, indeed, able to ‘get to where they need to go safely at the time they need to be there’ (outcome 6).

**Recommendation 26: The State Government should add an additional measure under Priority Area 6, Domain 1, to assess how many people with disability who use access taxis are able to get where they need to go safely and on time.**

## Universal design and the National Construction Code

We support the outcome for Priority Area 3: Universal Design. However, we believe the measures could be strengthened to be more ambitious and adequately represent policy and regulatory requirements made by the State Government under the National Construction Code 2022.

Measure 3.2. refers to the ‘total number of public-facing government buildings that are built or modified to enhance usability. For example, compliance with the current National Construction Code.’ Measure 3.3. refers to the ‘total number of new developments that incorporate Universal Design and/or the Livable Housing Design Guidelines within the National Construction Code.’ We strongly suggest redefining and separating these measures, as compliance with the National Construction Code is mandatory for all new residential homes and should not merely be listed alongside universal design as an ‘and/or’. Universal Design principles on the other hand, should be applied to all state authority developments, including but not limited to new buildings and infrastructure (internally and externally facing - people with disability are not only accessing these buildings as members of the public, they **are** part of the internal environment, for example public employees).

As of 30 October 2024, all new residential homes are required to be built to the National Construction Code 2022 Livable Housing Design Standard, with an 18-month review period where certain residential sites can be eligible for blanket concessions. The National Construction Code 2022 also states that adherence to the Livable Housing Design Standard Gold Level is voluntary for new residential developments. It is important that these are represented in the Outcomes Framework.

**Recommendation 27: The State Government should amend measures 3.2. and 3.3 by breaking them into separate measures, as follows:**

* **Total number of new state authority developments (including buildings, spaces and infrastructure) that incorporate universal design principles;**
* **Total number of new housing developments that comply with the Livable Housing Design Standard under the National Construction Code 2022, without the use of concessions; and**
* **Total number new housing developments that comply with the Voluntary Livable Housing Design Gold Standard under the National Construction Code 2022.**

## Housing and Homelessness

Access to safe, secure and suitable housing is essential to wellbeing and is a fundamental human right[[16]](#footnote-16). The draft Plan does not place significant focus on the need for more accessible housing options for people with disability. Given the current housing crisis, we believe this should be included in the introductory text to Domain 1. The State Government could draw on the language used in the ADS: ‘Access to affordable, safe and long-term housing underpins a person’s sense of home and their ability to participate in their communities. For people with disability to have choice about where to live and with whom, a range of housing options are required, including public and community housing, private rental and home-ownership.’

People with disability experience poverty, low incomes, barriers to employment (thus also financial and/or housing insecurity[[17]](#footnote-17)) and homelessness at a higher rate than people without disability[[18]](#footnote-18). Homelessness has profound impacts for health and wellbeing, and prevention of homelessness may at times require cross-government action/collaboration. Cross-government work on this topic would align with Australia’s Disability Strategy Policy Priority 7, under Inclusive Homes and Communities.

**Recommendation 28: The State Government should amend the introduction to Domain 1 to emphasise the need for more safe, affordable, accessible housing options for people with disability so they have a genuine choice about where to live and with whom.**

**Recommendation 29: The State Government should include outcomes and measures in the State Plan on providing early support to prevent homelessness, whilst also improving responses to homelessness amongst people with disability. Proposed outcomes could include:**

* **People with disability at risk of homelessness receive early support with a view to preventing homelessness.**
* **People with disability who are homeless or at risk of homelessness can access disability-informed and responsive homelessness/housing services and support, and suitable (and accessible) emergency and crisis accommodation as required.**

## Addressing segregation in “group homes”

The State Plan should commit the State Government to ensuring that all people with disability can access inclusive ordinary housing options within the term of the Australia’s Disability Strategy 2021-2031. This requires ceasing to fund new group houses and group house arrangements, and co-designing a plan with residents and other stakeholders to replace group houses with alternative inclusive options and support for existing residents to make genuine informed choices about where and with whom they want to live. This will require a commitment across the State Government to invest in a range of alternative accessible housing options, providing genuine choice and ordinary living arrangements.

**Recommendation 30: The State Government should include outcomes and measures in the State Plan on phasing out segregated housing and forced shared living arrangements and investing in a range of alternative accessible housing options.**

## Accessibility in the private sector

While the Plan encourages state authorities to comply with accessibility standards and universal design, not all private sector entities are obliged unless covered by federal law (like the *Disability Discrimination Act 1992* (Cth)). The Commission noted that compliance with accessibility standards across Australia is uneven. SA could consider stronger state-level requirements or incentives. For instance, it might tie grant funding or event permits to accessibility criteria (e.g. a festival must submit an accessibility plan to get government funding). Or it could expand programs that recognize and reward businesses that excel in accessibility (kind of like an “accessibility rating”). We recommend including such measures in the Plan to ensure broader uptake of accessibility beyond government-owned assets. We have also recommended the inclusion of a high-level commitment with respect to procurement above.

**Recommendation 31: The State Government should add an additional measure under Domain 1 regarding how many State Government contracts and grants awarded were dependent on compliance with accessibility standards.**

# Domain 2: Opportunity (‘Education and Employment’)

As stated previously, we suggest that this Domain be renamed ‘Education and Employment’.

There is a need for strong commitment in Domain 2 to transformative change – including ending segregated education and employment for people with disability. Achieving these critical changes will require leadership and sustained effort beyond the life of the Plan, along with national collaboration. But if we are truly to achieve genuine inclusive employment and education across SA, the Plan must make a solid commitment now.

## Language use with respect to education

Some of the language used with respect to education could be interpreted as reinforcing low expectations of people with disability. For example, education is described as an opportunity ‘to imagine and create an alternative future.’ This implies that people with disability have inherently negative future prospects that need to be reimagined. Education could rather be described as an opportunity ‘to imagine and create a positive future.’

The overall goal of Domain 2 refers to people with disability benefiting from ‘inclusive educational experiences’. This is particularly concerning given recent announcements by the State Government of funding for ‘special’ education programs.[[19]](#footnote-19) Children with disability have a right to an inclusive education, not potentially transitory experiences of it.

In the Consultation Paper, South Australians with disability and their families shared mixed experiences with respect to education: some noted improvements in recent years, while others pointed out ongoing issues like lack of teacher training, inconsistent support between schools, and exclusionary practices (such as suspensions and segregation into special classes).[[20]](#footnote-20) It is vital that the Plan not only acknowledges the right of children with disability to an inclusive education, but also gives effect to this right through strong outcomes and measures.

Whilst there are many conversations playing out in the public domain about whether segregated education settings should exist, the reality is that those choosing segregated settings are doing so because most mainstream schools are not genuinely inclusive and they feel they have no choice. We hear of families shifting their children from school to school, in search of an inclusive learning environment. Some end up resorting to homeschooling, as they lose faith in the system.

**Recommendation 31: The State Government should reword the ‘What we want’ section in Domain 2 to replace ‘A South Australia where all people with disability benefit from inclusive education experiences…’ to ‘A South Australia where all people with disability have genuine access to mainstream inclusive education...’**

## Inclusive education

Under Domain 2: Opportunity, the second outcome is ‘Children with disability have access to inclusive education.’ This is a highly critical outcome which relates to the State Government’s obligations pursuant to the UNCRPD and Australia’s Disability Strategy. It also aligns with the recommendations of the DRC. Yet there is only one measure listed: ‘Total number of children and young people with disability engaged in education.’ It is not clear what it means for a child to be ‘engaged in education,’ and whether this goes beyond enrolment. We hear of too many students with disability who are enrolled in school but are not receiving the support they need to receive a truly inclusive education. It also does not account for the number of school refusals. This single measure therefore does not give effect to the outcome.

We suggest co-designing this outcome and the accompanying measures alongside students with disability and their families, disability advocacy and peer/representative bodies, the Department for Education and other relevant stakeholders. The types of measures that could be listed include:, number of school refusal days, learning aides available, alternative teaching methods applied, exclusionary practices used, barriers to enrolment encountered etc. Some measures should capture the experiences and impressions of students or family members themselves.

**Recommendation 32: The State Government should co-design the State Plan’s outcomes and measures with respect to inclusive education, alongside students with disability and their families, disability advocacy and peer/representative bodies, the Department for Education and other relevant stakeholders.**

## Ending segregation in schools

With respect to education, there is a glaring gap between the contents of the Plan and the DRC’s vision of phasing out segregated education (which aligns with the UNCRPD). The DRC, in landmark Recommendation 7.14e, suggested a 20-year transition toward fully inclusive education (with a target to phase out most segregated ‘special’ schools by 2051). The Plan does not explicitly address whether segregated schools will continue indefinitely or be phased out as mainstream education settings move towards genuine inclusion.

Currently, SA still has a network of segregated schools and units, and the State Government recently announced even greater funding towards segregated options within mainstream schools. We are therefore concerned the State Government is not heeding the DRC’s call or complying with its international obligations with respect to inclusive education.

**Recommendation 33: The State Government should amend the State Plan to include measures regarding the number of segregated schools, the number of segregated classrooms in mainstream schools, and the number and proportion of students with disability receiving an education in each of these segregated settings. This should be coupled with an outcome that sets an ambitious, timebound target for the implementation of a fully inclusive education system, whereby all children can attend their local mainstream school and learn alongside their peers.**

**Recommendation 34: The State Government should amend the State Plan to include a measure regarding the number of students with a disability receiving an education in mainstream schools.**

## Funding for inclusive education

Another gap in the draft Plan relates to funding for inclusive mainstream education. Participants during the consultation that informed the draft Plan wanted “greater accountability in the way funding is utilised”[[21]](#footnote-21) and transparency to ensure resources for inclusive education are reaching the students intended. The Plan acknowledges the need for efficient use of resources, but if schools continue to struggle with funding or if adjustments are not adequately resourced (for example, if a student needs an aide or adaptive tech and this is delayed due to budget), then inclusion suffers. The Department for Education has an Inclusive Education Support Program (IESP) funding model; making sure that model is fair, responsive and adequate is critical. To support this, we believe that the Plan should monitor whether resource allocation is meeting needs. In the past, we have pointed out issues with how funding mechanisms incentivise or disincentivise inclusion.

**Recommendation 35: The State Government should amend the State Plan to include measures about the extent to which available funding and resources are meeting the needs of students with disability.**

## Targeted transition supports

One of the priority areas in the Plan is ‘targeted transition supports.’ Transitions and pathways in education were identified as pain points in the consultation that informed the draft Plan.[[22]](#footnote-22) Students with disability often face barriers during key transitions – entering school, moving from primary to high school, and transitioning from school to post-school life (whether tertiary education, vocational training or employment). Participants in the consultation stressed that tailored transition planning and connections to further opportunities are needed.

The current measures relate to opportunities for students with disability post-school (e.g. volunteering, higher education, apprenticeships and employment) but do not mention the actual transition into these opportunities. In our experience, transition support is critical. For example, JFA Purple Orange delivers workshops for high school students about their options post-school. The Plan should encourage relevant state authorities to undertake initiatives that support this transition, as it can be a difficult time for students with disability.

**Recommendation 36: The State Government should amend the State Plan to include a measure about the number of initiatives supporting high school students with disability to transition to higher education and/or employment.**

## Ending segregated employment

The most glaring gap with respect to employment is the lack of commitment to moving away from segregated or underpaid employment options, such as Australian Disability Enterprises (ADEs). The DRC, in Recommendation 7.15, recommended phasing these out in favour of open employment. The Plan does not directly mention ADEs or any plan to transition away from them. ADEs are funded by the Commonwealth, but states can influence the landscape by facilitating transition programs or by committing to not use ADEs in their procurement supply chains, for example. The phasing out and ending of ADEs is crucial to achieving genuine employment equity.

This area will require national coordination. SA’s Plan supports “meaningful employment,” which could imply preference for mainstream jobs at fair pay, but it stops short of committing to “phase out segregated employment settings” or “support the transition to full waged employment in mainstream settings”. In practice, further work is needed to create pathways for current ADE workers to move into open employment and to ensure new jobseekers aren’t channelled into segregated paths.

The Plan’s success on employment will partly be measured by metrics like an increase in the employment rate of people with disability, a reduction in the unemployment gap, and a decline in use of ADEs as better options emerge. Monitoring those indicators is crucial, and the Plan’s alignment with ADS means those figures will be tracked publicly. Interstate, for example, the Victorian plan explicitly refers to transitioning people with Down Syndrome or intellectual disability into meaningful mainstream employment, through the Impact 21 initiative.[[23]](#footnote-23)

**Recommendation 37: The State Government should amend the State Plan to include additional measures (and targets) with respect to overall employment outcomes for people with disability. This could include an increase in the employment rate of people with disability, a reduction in the unemployment gap, and the decline in the number of people with disability working at Australian Disability Enterprises.**

## Inclusive employment practices

Given the prevalence of barriers to employment for people with disability, it is important for the Plan to commit state authorities to improving their own inclusive employment policies and practices.

We are pleased to see that the Plan will measure the use of inclusive recruitment and retention processes among state authorities. However, we believe there should be an additional outcome that places the onus more firmly on state authorities (rather than focusing on people with disability having opportunities, which is rather passive). We suggest adding an outcome such as, ‘All state authorities are inclusive and accessible employers for people with disability.’

We also suggest expanding measure 4.2 (or breaking it into more than one measure) to capture progress towards this outcome. At present, 4.2 refers to the provision of ‘access and support for people with disability,’ which does not fully align with the Social Model of Disability. The focus should shift to ensuring that workplace culture, policies, processes, practices and physical environment are inclusive and accessible.

Priority Area 4 could also be reframed as ‘Access to inclusive employment opportunities.’

**Recommendation 38: The State Government should amend Priority Area 4 in Domain 2 to: ‘Access to inclusive employment opportunities.’ The following outcome should be added: ‘All state authorities are inclusive and accessible employers for people with disability.’ The focus of measure 4.2 should shift to ensuring that workplace culture, policies, processes, practices and physical environment are inclusive and accessible.**

## Inclusive education and workplace environments

Priority Area 5 is ‘Supportive environments.’ We recommend changing this language to ‘Inclusive environments’, as this aligns with the social model of disability. While the outcome is ‘[p]eople with disability have access to a supportive place to learn and earn,’ there are no measures related specifically to workplaces. In fact, measure 5.2 (‘Total number of adjustments made to support people with disability to have equal opportunities for grown and success’) does not specify which setting it applies to. We recommend amending measures 5.1 and 5.2 to specify that they both apply to all state authority workplaces and learning environments.

**Recommendation 39: The State Government should change the wording of Priority Area 5, Domain 2, from ‘Supportive environments’ to ‘Inclusive environments.’ Amendments should also be made to measures 5.1 and 5.2, to specify that they both apply to all state authority workplaces and learning environments.**

## Public sector employment target

The State Government is legally obligated to set a target for public sector employment in the Plan.[[24]](#footnote-24) This should be ambitious, going beyond the 3% target set in the SA Public Sector Diversity and Inclusion Strategy. Drawing on the targets of other states/territories and the Commonwealth Government, we propose at least 8% by 2029. This is a modest target, given 1 in 5 South Australians has a disability.

**Recommendation 40: The State Government should amend the State Plan to include a target for the employment of people with disability in the South Australian public service of at least 8%.**

## Supporting mainstream employers

The Plan should also encourage state authorities to support initiatives by other mainstream employers that will achieve positive employment outcomes for people with disability (e.g. initiatives that build the capacity of employers in disability inclusion). We have seen positive examples of this by local Councils, such as the provision of training on inclusive employment.

**Recommendation 41: The State Government should amend the State Plan to include an additional measure on the number of initiatives that build the capacity of mainstream businesses/organisations to become more inclusive employers.**

## Representation in leadership

People with disability are still under-represented in leadership roles in community organisations, on boards, and in elected office. The Plan (in Domain 2, area 4) will measure the number of public sector employees in leadership positions. However, outcomes in this space can take time. Tracking how many people with disability are on government boards or in parliament over time could also be an indicator of change. Currently, only a small number of South Australian Members of Parliament have openly identified as having disability. Bolstering leadership representation is a longer-term goal, and it is essential that the Plan sets the stage now.

**Recommendation 42: The State Government should amend the State Plan to add an additional measure under Priority Area 4 in Domain 2 on how many people with disability are represented on government boards or in parliament.**

## Disability Advisory Groups

A number of state authorities, particularly local Councils, have established standing advisory groups of people with disability to support with the development and/or implementation of their DAIPs. The Minister for Human Services is one such example. Advisory groups can be a valuable way of ensuring that people with disability are involved in decision-making on matters that affect their lives. However, it is important that these Advisory Groups do not become an avenue for the state authority to simply brief people with disability on actions they are taking; it must ensure decision-making lies with the Advisory Group. We recommend including an outcome and measure on this. This could be included in Domain 1 or

**Recommendation 43: The State Government should revise the State Plan to include an outcome and measure related to the number of state authorities that have a standing advisory group of people with disability, and the number of matters on which they have provided advice.**

# Domain 3: Support (‘Personal and Community Support’)

As stated previously, we suggest that this Domain be renamed ‘Personal and Community Support’.

One of the clearest messages from the DRC was that governments must not abdicate their responsibility for providing non-segregated mainstream supports for people with disability, even with the NDIS in place. People with disability need a *coherent ecosystem* of support: individualised NDIS-funded services for those eligible, plus inclusive mainstream services and community-based supports for everyone. Domain 3, which addresses mainstream and community supports, is therefore highly important.

## Experiences of people with disability

The first outcome under Domain 3 is: ‘people with disability can access the community supports and services they need.’ While we welcome the proposed measures for this outcome, we believe it is important to capture the perspectives of people with disability themselves. The mere existence of initiatives, platforms and systems does not help to measure whether these are inclusive, accessible and responsive to need. Even the number of supports and services accessed does not capture the number of people who are unable to access these or provide insight into the quality of these supports and services.

**Recommendation 44: The State Government should amend the State Plan, under Priority Area 1 of Domain 3, by adding qualitative measures that assess whether people with disability find community supports and services to be inclusive, accessible and responsive to their needs.**

## Independent advocacy

‘Support and advocacy’ is currently included as a priority area under Domains 3 (with respect to accessing advocacy services) and 5 (with respect to accessing support in the criminal justice system). JFA Purple Orange recommends addressing advocacy in one location under Domain 3. We advise keeping ‘support’ as a Priority Area under Domain 5, as this could relate to other types of support (such as Communication Partners).

**Recommendation 45: The State Government should place all outcomes and measures related to independent advocacy under Domain 3 of the State Plan.**

### Language use

The draft Plan currently refers simply to ‘advocacy.’ We recommend referring more specifically to as ‘independent advocacy’, in recognition of the fact that all advocacy services need to be independent from government and service providers to avoid conflicts of interest or the appearance of bias.

**Recommendation 46: The State Government should refer to ‘independent advocacy’ throughout the State Plan, rather than simply ‘advocacy.’**

The current advocacy outcome for Domain 3, Priority 2 states: ‘People with disability are provided with disability advocacy support when they’re unable to advocate for themselves.’ We suggest avoiding language that implies that people with disability are ‘unable to advocate for themselves’ and focusing rather on the support some people with disability may need to successfully advocate for themselves. People with disability may be able to self-advocate in some circumstances, or on some topics, but not others. This wording also does not represent the current complexity of some aspects of our state system, safeguarding mechanisms or reporting avenues. Nor does it reflect the need for representative/peer group advocacy and systemic advocacy. We therefore suggest this outcome should be rephrased, as set out below.

**Recommendation 47: The State Government should amend the outcome for Priority 2, Domain 3 to ensure it is worded in a strength-based way and reflects the need for different types of advocacy. For example, ‘The rights of people with disability are adequately protected and promoted through individual, independent advocacy; representative/peer group advocacy; and systemic advocacy.’**

### Data collection on advocacy

We endorse the DRC’s Recommendation 6.22 that all governments ‘improve data collection and reporting on met and unmet demand’ within their jurisdictions, and believe the Plan is the best vehicle to achieve this. For example, measures could be included that capture the number of people with disability on waiting lists for advocacy services, number of services available, number of clients supported and number of people unable to access services when needed. Relevant state authorities should work with other jurisdictions to ensure data collection is robust, comprehensive and nationally consistent.

**Recommendation 48: The State Government should amend Domain 3 of the State Plan to include outcomes and measures on met and unmet demand for independent advocacy services for people with disability. This could include the number of people with disability on waiting lists for advocacy services, number of services available, number of clients supported and number of people unable to access services when needed.**

### Advocacy funding

JFA Purple Orange urges the State Government to commit to providing adequate funding for independent disability advocacy services. The need for greater independent advocacy funding does not relate to just one of the Plan’s Domains: independent advocates can support people with disability to access any of their human rights across all five Domains of the Plan.

In its Final Report, the DRC emphasises that independent advocacy services are essential for upholding the human rights and wellbeing of people with disability.[[25]](#footnote-25) It recognises that all people with disability should have access to high-quality, well-resourced, independent advocacy services. Yet, the DRC found that existing advocacy programs are not meeting demand and therefore additional investments are needed.[[26]](#footnote-26) This is particularly the case in SA where successive governments have failed to fulfil their responsibility to fund independent disability advocacy adequately, or at all, since 2007.

We believe New South Wales (NSW) provides a sound model on which to base a SA approach to advocacy funding that can be implemented without any further delay. We have modelled this, using the Productivity Commission’s approach in its 2017 Report on NDIS Costs, at $3.3 million in 2025-26 – a modest investment relative to other areas of government expenditure. This should be accompanied by comprehensive data collection and reporting about demand and unmet need to calibrate the investment over time, noting that demand will be higher during the current period of significant changes including in the NDIS and the roll out of Foundational Supports. We have recommended above that the State Plan (Domain 3) could be the tool for collecting such data.

**Recommendation 49: The State Government commit to independent advocacy funding, in line with the New South Wales model. This should include three funding streams for organisations to provide individual, representative/peer group, and systemic advocacy. The State Government’s commitment could either be written into the State Plan itself or could be announced as a separate measure to support implementation of the State Plan.**

**Recommendation 50: The State Government should ensure independent advocacy services are available across the whole state and specialist services for groups such as First Nations people, people from culturally and linguistically diverse backgrounds, people in closed systems, and people with complex communication needs are funded in all three streams.**

# Domain 4: Wellbeing (‘Health and Wellbeing’)

As stated previously, we suggest that this Domain be renamed ‘Health and Wellbeing’.

Feedback provided during the consultation that informed the draft Plan painted a vivid picture of current shortcomings in healthcare: many South Australian medical facilities are physically inaccessible or lack adaptive equipment, and health professionals often operate under a “medical model” mindset and are unsure how to interact with patients with disability. Respondents noted that simple improvements – like consulting people with disability when designing new health facilities or having signage that clearly indicates accessible routes – could reduce the stress and barriers they face.

These suggestions align well with DRC recommendations that providers make reasonable adjustments and that disability awareness be embedded in professional training curricula. In fact, many consultation participants (including clinicians) suggested mandatory training on disability inclusion for all health and mental health professionals.

## Introductory text

In the introductory text to Domain 4, we suggest including more context about the specific health needs that people with disability may experience. At present, the draft Plan states that ‘[p]eople with disability require the same access to health care as all other South Australians,’ which does not reflect the fact that certain disabilities give rise to additional health needs. For example, some people with disability may be at increased risk of experiencing co-occurring health issues (e.g. people with Down Syndrome are at much higher risk of experiencing cardiac issues, Autistic people experience higher rates of Post Traumatic Stress Disorder, people with quadriplegia are at much higher risk of developing respiratory issues).

**Recommendation 51: The State Government should revise the introductory text to Domain 4 to include more context about the specific health needs that people with disability may experience.**

## Perspectives of people with disability

The first outcome under Domain 4 is that ‘our health infrastructure is accessible and inclusive for people with disability.’ This is a solid outcome, and the measure related to how many healthcare sessions are compliant following an audit is good. However, we suggest adding an additional measure that captures the perspectives of people with disability (whether they find health infrastructure inclusive and accessible). This is the most reliable way to measure progress.

**Recommendation 52: The State Government should revise Priority Area 1, under Domain 4, to include an additional measure that captures whether people with disability find health infrastructure inclusive and accessible.**

The third outcome relates to a coordinated approach to the provision of health supports ‘to meet the needs of people with disability.’ In order to track progress towards this outcome, there is a need for a measure relating to whether people with disability feel that health supports are meeting their needs.

**Recommendation 53: The State Government should add a new measure to the State Plan under Priority Area 3, Domain 4, relating to whether people with disability feel that health supports are meeting their needs.**

## Procedures and guidelines

Measure 3.2. captures the total number of procedures and guidelines that ‘recognise people with disability’. It is not clear what this means, and it is not sufficiently ambitious. We suggest reframing to focus on whether procedures and guidelines uphold the rights of people with disability, address the barriers they face, and respond to their needs.

**Recommendation 54: The State Government should reword Measure 3.2, under Domain 4, to align with the outcome of meeting the needs of people with disability. It should focus not on whether procedures and guidelines ‘recognise people with disability,’ but whether they uphold the rights of people with disability, address the barriers they face, and respond to their needs.**

## Quality of support and response

We are concerned that the measures under Priority Area 3 focuses only on numbers and not experiences. The Plan should capture progress with respect to the *quality* of coordinated support and responses between mental health and disability service providers, not just the number of agreements and patients accessing services.

**Recommendation 55: The State Government should revise Priority 3, Domain 4, to include a measure that captures whether supports and pathways are meeting the needs of people with disability.**

## Shifting from understanding to action

The second outcome under Domain 4 is a healthcare system that is ‘knowledgeable and understands the intersectionality and diversity of disability.’ The Plan should be more ambitious than this. We should aim beyond a system that understands disability, to a system that responds to the needs of people with disability in an accessible and inclusive way. We therefore suggest reframing this outcome and adding a measure that captures the perspectives of people with disability.

**Recommendation 56: The State Government should reframe second Outcome under Domain 4 to shift away from knowledge and understanding to accessibility and responsiveness. For example, ‘Our healthcare system is inclusive and accessible and responds to the needs of people with disability.’**

**Recommendation 57: The State Government should add a new measure to Outcome 2, under Domain 4, which captures the perspectives of people with disability as to whether the healthcare system is inclusive, accessible and responsive to their needs.**

## Capacity and resourcing

Capacity and resourcing are major issues with respect to health and wellbeing. Services will not be truly accessible without the required staffing and resources. For example, improving healthcare access might mean investing in accessible equipment or hiring specialist staff (like hospital disability liaison officers). The Plan acknowledges these problems but doesn’t specify how to fix them. SA should take further steps such as funding training programs or incentives to grow the health and disability workforce (particularly to attract workers to regional areas, where shortages are acute).

**Recommendation 58: The State Government should revise the State Plan to include a priority area (with an outcome and measures) about growing the health and disability workforce, particularly in regional areas.**

**Recommendation 59: The State Government should revise the State Plan to include a measure on initiatives to build the capacity of staff working in health (including mental health), such as disability inclusion training.**

# Domain 5: Justice (‘Safety, Justice and Rights’)

As stated previously, we suggest that this Domain be renamed ‘Safety, Justice and Rights’.

Importantly, this Domain must go beyond the criminal justice system to also cover civil law. Our proposed heading also aligns with the outcome areas of the ADS and would enable a wider range of topics to be covered such as safeguarding; restrictive practices; domestic, family and sexual violence; and child protection.

While the introduction to Domain 5 acknowledges that people with disability are more likely to experience violence, abuse, neglect and exploitation than the rest of the population, there is no mention of the DRC. The multi-year DRC was a highly significant process for the disability community, and this omission is glaring. We are pleased to see that there is a measure under Priority Area 5 on the proportion of DRC recommendations being addressed. However, this will only measure progress. We highly recommend that the State Government makes a clear commitment to implementing the DRC’s recommendations in the Plan.

**Recommendation 60: The State Government should acknowledge recommendations of the Disability Royal Commission into Violence, Abuse, Neglect and Exploitation Against People with Disability under Domain 5 and commit to implementing its recommendations.**

## Expansion to the civil law system

At present, Domain 5 includes commitments/outcomes that in essence relate to:

* Improving experiences with criminal justice laws and systems (priority areas 1, 3 and 4);
* responding to emergencies (priority area 2); and
* safeguarding (priority area 5).

Given the profound inequities that people with disability experience in relation to criminal justice systems[[27]](#footnote-27), we recognise why at present there is a criminal justice system focus. However, there are many areas of civil law in which people with disability can also encounter significant issues and barriers. There are also areas of civil law in which people with disability are unfairly over-represented, and/or experience barriers to access, and where action is urgently needed to ensure more equitable outcomes.

Areas of civil law practice that can strongly impact people with disability include:

* Equal opportunity, human rights and discrimination law;
* Employment and workplace rights;
* Housing and tenancy laws;
* Family law, and child protection;
* Mental health rights and laws;
* Guardianship and property;
* Restrictive practices; and
* Protection orders (in relation to family, domestic, sexual, workplace or other experiences of violence).

Given the above, people engaging with civil law policies and processes also need:

* To be interacting with staff with adequate levels of knowledge, understanding, supports and ability to uphold rights in civil law areas of practice;
* Barriers to accessing civil law information and processes to be addressed;
* Access to advocacy/support; and
* To be involved in design and delivery of policies, programs and laws relevant to them.

We therefore recommend that the Plan include civil law priority areas that mirror those already included with respect to criminal justice systems.

**Recommendation 61: The State Government should amend the State Plan by expanding all outcomes and measures relating to the criminal justice system in Domain 5 to also include the civil law system. These should cover targeted knowledge, understanding and upholding rights; access to adequate support and advocacy; and consultation, collaboration and co-design with respect to all areas of reform.**

## Strengthening disability justice outcomes and measures

The Outcome under Priority Area 1 calls for emergency responders and the criminal justice system to “understand and support” people with disability. We recommend this wording be strengthened, to extend beyond understanding and support to also require upholding the rights of people with disability throughout all stages of the justice process (including, if applicable, in detention).

Justice-related rights as outlined by the UNCRPD and relevant laws include:

* access to justice;
* non-discrimination (i.e. by ensuring reasonable adjustments are made);
* respect for individual autonomy, dignity and the freedom to make one’s own decisions (with support if required);
* safety including freedom from violence, abuse, neglect and exploitation; and
* access to advocacy and legal support etc.

The first two measures should also be strengthened with specific targets (a proportion or number), as well as adding additional measures to capture the perspectives of people with disability. Measure 1.1. relates to how many emergency responders ‘are equipped with the knowledge and skills to confidently support people with disability’ and Measure 1.2 relates to whether justice and legal workers are ‘disability confident and respond positively to people with disability.’ One of the most informative ways of measuring progress with respect to both measures would be to ask people with disability themselves.

We also suggest that the term “criminal justice system” be defined in the Plan to include police, advocates, lawyers, courts etc.

**Recommendation 62: The State Government should expand the first outcome under Domain 5 as follows: ‘Emergency responders and all actors within the criminal justice system understand and support people with disability and uphold their rights throughout all stages of the justice process.’**

**Recommendation 63: The State Government should revise the State Plan Domain 5: Justice to include a broad definition of ‘the criminal justice system’ that encompasses all relevant actors (including police, advocates, lawyers, and courts).**

**Recommendation 64: The State Government should add additional measures under Priority Area 1, capturing whether people with disability feel that a) justice and legal workers understand disability and are inclusive in their interactions with people with disability and b) emergency responders are equipped with the knowledge and skills to confidently support people with disability.**

## Training

While the first Priority Area under Domain 5 refers to certain personnel having knowledge, skills and confidence with respect to disability inclusion, we recommend including an additional measure specifically about training. During the consultation to inform the draft Plan, South Australians with disability reported frequent misunderstandings and prejudice in their interactions with police, prison officers, and first responders – for example, disability-related behaviours being mistaken for defiance, or people with cognitive disability not being seen as credible witnesses. In response, the Plan should commit to improving training and awareness for police, courts, corrections, and emergency services and restoring funding for Communication Partners. A *trauma-informed* approach and practical communication tools can ensure officials interact safely and fairly with people with disability.

**Recommendation 65: The State Government should revise Domain 5 to include an outcome and measure on disability inclusion training, developed and delivered by people with disability, for all actors in the justice system (police, courts, corrections etc) as well as emergency services.**

## Safeguarding

South Australia’s safeguarding systems for people with disability are difficult to navigate, particularly given different aspects of the system are scattered across multiple State Government Agencies.

The current outcome with respect to safeguarding (Priority Area 5) reads ‘People with disability can access safeguarding supports and services.’ We suggest expanding the focus to also include the effectiveness, inclusiveness and responsiveness of such supports and services.

**Recommendation 66: The State Government should expand Outcome 5 to ‘People with disability can access effective, inclusive and responsive safeguarding supports and services.’**

## Domestic, family and sexual violence

As reiterated by the DRC, women with disability are significantly over-represented amongst those experiencing domestic, family and sexual violence[[28]](#footnote-28). Prevalence can be higher again for those who experience additional intersectional barriers.

Given that effective change/responses may require action across State Government Agencies, we recommend that the Plan include outcomes and measures on improving prevention and responses to DFSV across service systems. Whilst there is concurrent work occurring via the South Australian Royal Commission into Domestic, Family and Sexual Violence, it is important that the Plan also focuses on preventing (and improving responses for people who have experienced) domestic, family and sexual violence.

**Recommendation 67: The State Government should include outcomes and measures in the State Plan on preventing (and improving responses for people who have experienced) domestic, family and sexual violence. Measures should assess progress with respect to each Priority Group.**

**Recommendation 68: The State Government should amend the State Plan to include a measure about the extent to which DRC recommendations regarding domestic, family and sexual violence have been implemented.**

## Restrictive practices

Measure 5.3 refers to the ‘Total number and type of authorised and unauthorised restrictive practices to support safeguarding.’ Restrictive practices do not serve to support safeguarding; rather, safeguarding protects against restrictive practices. We suggest removing this last phrase.

**Recommendation 69: The State Government should amend Measure 5.3 to remove the term ‘to support safeguarding,’ so the measure reads as follows: ‘Total number and type of authorised and unauthorised restrictive practices used.’**

## Family Support and Child Protection

A research report commissioned for the DRC cites evidence that parents with disability across Australia are over-represented as subjects of child protection processes.[[29]](#footnote-29)  Children with disability are also over-represented in out of home care. However, at present, there is insufficient data to measure the over-representation of either parents or children with disability in the child protection system. Additional work is also needed to ensure that the rights of people with disability (including people with intersecting identities) are upheld throughout their involvement in child protection processes.

Families with parents and/or children with disability (in contact or at risk of being in contact with the child protection system) often do not receive accessible and inclusive information, support and services. We have recommended above that all state authorities provide training opportunities for staff on disability inclusion. This is highly critical with respect to people working in family support and child protection, and training must be tailored to this specific context. Given the over-representation of parents with intellectual disability and First Nations families involved in (or at risk of becoming involved in) the child protection system, training must also cover intersectionality.

**Recommendation 70:** **The State Government should include an outcome on reducing the number of parents and children with disability involved in child protection processes, and the number of children with disability in out of home care. Measures could include how many parents with disability are engaged with the child protection system; how many children with disability are involved in child protection processes; and the proportion of children with disability involved in child protection processes that are placed in out of home care.**

**Recommendation 71: The State Government should include an outcome in the State Plan on the accessibility and inclusiveness of information and support available for families engaged in the child protection system. Measures should include the number of information sources available in a range of accessible formats, including Easy English; the number of inclusive support services available for parents with disability; and the proportion of people with disability reporting that they were able to access inclusive information and support.**

**Recommendation 72:** **The State Government should include an outcome in the State Plan on increasing the skills, knowledge and understanding of staff working in family support and child protection with respect to supporting parents and children with disability, including those with intersecting identities. A measure should be included on the number and proportion of family support and child protection staff receiving training on disability inclusion and intersectionality.**

## Responding to emergencies

We welcome the suggested outcome that ‘the safety of people with disability during emergencies is prioritised’. We suggest expanding this to ensure that both the safety and rights of people with disability are prioritised during emergencies (to ensure, for example, that safety is not prioritised at the expense of people’s dignity, autonomy and decision-making rights). We also recommend that the measures be expanded beyond the number of emergency resources/supports (and the number of systems in place to respond to diverse needs) to also consider the effectiveness of resources, supports and systems. This should be assessed by people with disability themselves.

**Recommendation 73: The State Government should expand Outcome 2, under Domain 5, to: ‘The safety and rights of people with disability during emergencies are prioritised.’ The accompanying measures should be expanded to consider the effectiveness of resources, supports and systems from the perspective of people with disability.**

# State Plan implementation

We commend the South Australian Government on the significant amount of work undertaken since the commencement State’s Disability Inclusion Plan (2019-2023) to ensure that State Government Agencies and local Councils adopted Disability Access and Inclusion Plans (DAIP). We take this opportunity to suggest ways in which the State Government could provide stronger, more impactful support with implementation of the new State Plan.

## Funding

While the initial State Inclusion Plan was responsible for instigating some meaningful change, we have been regularly advised, by state and local government counterparts and the disability community, that a lack of resources for implementation significantly hampered efforts to turn the good intentions contained in DAIPs into real outcomes. This can be a particular issue in regional areas. The Consultation Paper pointed out that regional and remote areas lag in accessibility: country towns often have council buildings or sports facilities that are not accessible, and limited funding to fix them.[[30]](#footnote-30) The Plan acknowledges this disparity and encourages regional improvements, but implementation will require targeted resources for those communities. It may be necessary for the State Government to provide grants or incentives to rural Councils to undertake accessibility upgrades (since their rate bases are smaller). Without dedicated funding, there is a risk that metro areas advance faster than rural ones, leaving an inclusion gap.

The impact of the next iteration of DAIPs will hinge heavily on the extent to which resources are available to all state authorities to implement actions contained in them. In the lead up to the 2022 State Election, we asked all parties to commit to ensuring resources would be available to state authorities to implement their DAIPs. We were advised by the State Labor Party that this would be seriously considered as part of the State Annual Budget Process. We strongly stand by this recommendation and urge the new Plan to commit to providing sufficient funding for the implementation of DAIPs by state authorities, to ensure good intentions turn into real outcomes.

**Recommendation 74: The State Government should adequately resource the State Plan to ensure that state authorities can fully implement their obligations to co-design, consult, implement and report in a way that ensures genuine outcomes for people with disability as intended by the legislation.**

**Recommendation 75: The State Government should amend the State Plan to commit the State Government to establishing a Grants SA funding stream open to local Councils to provide financial assistance for implementing DAIP actions, such as modifications to buildings or websites, training for staff, and support to set-up and run local advisory or co-design groups to draw on the experiences and insights of the disability community.**

**Recommendation 76: The State Government should commit specific resources to DAIP implementation in regional areas, particularly with respect to accessibility upgrades.**

## Resources and support

As noted above, JFA Purple Orange has been contacted on numerous occasions by local Councils and State Government Agencies seeking advice and support (sometimes through a formally contracted piece of work) on the development and implementation of their DAIPs. While DHS provided some guidance and support on implementation of the previous State Plan, more detail would have been helpful.

With respect to local Councils, the first State Plan saw all 68 councils produce DAIPs, which is a significant achievement. Few other states legislate local Council plans, making SA a leader in this respect. However, further work needs to be done to ensure consistency in quality: some DAIPs were very strong and effective, others much less so.

The situation with respect to State Government Agencies is similar, and the quality of DAIPs varies considerably. We have examined multiple DAIPs to identify good practice and support agencies to develop their own DAIPs. We have also been engaged to review the impact of previous DAIPS, with a view to informing the way forward.

There are some aspects of the draft Plan that state authorities will clearly require guidance on to implement effectively. For example, in Domain 2, measure 4.2. is ‘Proportion of State authorities using best practice inclusive recruitment and retention processes to provide equitable access and support for people with disability. For example, staff training and policy changes.’ It would be useful for DHS to develop clear guidance on what constitutes best practice inclusive recruitment and retention processes (JFA Purple Orange could assist with this, if required).

We recommend that DHS consult with all state authorities to ask which support and guidance they need to develop and implement their DAIPs. This might include measures such as written guidance, templates, instructional videos, a training workshop, or a Community of Practice. If the State Government is serious about strengthening access and inclusion through the State Plan, it is essential that there is an adequate investment of time and resources in supporting state authorities with their DAIPs.

**Recommendation 77: The State Government should consult with state authorities about which support and guidance they need to develop and implement strong, action-oriented, outcomes-focused DAIPs. The State Government should invest adequate time and resources into providing the support and guidance requested.**

## Implementation Advisory Group

At JFA Purple Orange, we advocate for co-design processes to span the duration of a project/policy etc. It is critical that people with disability are at the decision-making table with respect to the development of the State Plan, as well as its implementation and review.

We recommend that DHS work with an Implementation Advisory Group, comprising people with disability and advocacy/representative organisations, to oversee implementation of the Plan and provide advice and guidance to DHS. This group could also help to inform the support provided to individual state authorities on the development and implementation of their DAIPs.

**Recommendation 78: The State Government should work with an Implementation Advisory Group of people with disability (such as the Disability Minister’s Advisory Group) to oversee implementation and review of the State Plan and provide advice and guidance to State Government.**

# State Plan review

The *Disability Inclusion Act 2018* (SA) requires a review of the Plan at least every four years. If the SA Government commits to genuine co-design and ongoing feedback, as is now mandated and as we’ve recommended, the Plan should be a living document that can adapt. One potential gap is ensuring emerging issues are captured. For example, new technology (like AI, autonomous vehicles) could introduce new inclusion challenges or opportunities within the Plan period. The governance process needs to be nimble enough to incorporate such topics.

The Consultation Paper included feedback that updates should be easy to access and understand. Perhaps SA might consider interim updates or an online dashboard that is kept current. Currently, annual PDF reports are the main tool. An interactive dashboard updated more frequently (quarterly or biannually) could be an innovative step for accountability, allowing the public to see progress in near real-time. This is a possible area of further modernization.

**Recommendation 79: The State Government should develop mechanisms to ensure that the State Plan can have emerging issues added and addressed in real time.**

**Recommendation 80: The State Government should consider developing an interactive dashboard, updated quarterly or biannually, to monitor and view progress on State Plan implementation in real time.**

# Conclusion

We hope this submission provides useful guidance to DHS on how to strengthen the draft Plan in a way that will bring about meaningful change for South Australians with disability.

We have called for a vision statement, high-level commitments for all state authorities, more rights-based language, and a stronger outcomes framework with more ambitious outcomes and measures. Critically, we have called for the State Government to take a co-design approach to revising the draft Plan, in line with recent amendments to the *Disability Inclusion Act 2018* (SA).

We would be grateful for the opportunity to discuss this submission with DHS, and to support the State Government to establish and facilitate a robust co-design process to revise the Plan and support its implementation and review.

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3. (s8(2)). [↑](#footnote-ref-3)
4. Royal Commission into Violence, Neglect, Abuse and Exploitation of People with Disability, *Final Report*, Volume 1, p. 112. [↑](#footnote-ref-4)
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6. S 7A (1). [↑](#footnote-ref-6)
7. S 7B (1) a). [↑](#footnote-ref-7)
8. Royal Commission into Violence, Neglect, Abuse and Exploitation of People with Disability, *Final Report*, Volume 1, p. 16. [↑](#footnote-ref-8)
9. Royal Commission into Violence, Neglect, Abuse and Exploitation of People with Disability, *Final Report*, Volume 1, p. 184. [↑](#footnote-ref-9)
10. See *State Disability Inclusion Act 2018* (SA), Part 5, s16(3)(d). This section of the Act states that DAIPs must include strategies to support people with disability with respect to (1) access to build environs, events and facilities; (ii) access to information and communications; (iii) addressing the specific needs of people with disability in its programs and services; and (iv) employment. [↑](#footnote-ref-10)
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12. Department of Human Services, State Disability Inclusion Plan Consultation Report (2024), p6. [↑](#footnote-ref-12)
13. Northern Territory Disability Strategy Action Plan 2022–2025. [↑](#footnote-ref-13)
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23. *Inclusive Victoria State Disability Inclusion Plan 2022 -2206,* p.66. [↑](#footnote-ref-23)
24. *Disability Inclusion Review Recommendations Amendment Bill 2024* (SA) s8(1). [↑](#footnote-ref-24)
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26. *Ibid*, pp.285-289. [↑](#footnote-ref-26)
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28. Royal Commission into Violence, Neglect, Abuse and Exploitation of People with Disability, *Final Report*, Volume 8. Available online via:  [https://disability.royalcommission.gov.au/publications/final-repor](https://disability.royalcommission.gov.au/publications/final-report)t, accessed in April and May 2025. [↑](#footnote-ref-28)
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