



24 March 2023

NDIS CALD Strategy 2023-2027

Joint submission of feedback: Inclusion Australia, National Ethnic Disability Alliance (NEDA) and Down Syndrome Australia

Inclusion Australia, the National Ethnic Disability Alliance (NEDA) and Down Syndrome Australia are pleased to contribute this joint submission of feedback to the NDIS Culturally and Linguistically Diverse (CALD) Strategy 2023-2027 (the Strategy).

We thank the NDIA for the opportunity to contribute and hope our recommendations assist in ensuring the priorities and goals of the Strategy—as well as the consultation process itself—are accessible and meets the needs of CALD people with disability, and particularly those with an intellectual disability.

About us

Inclusion Australia is the national Disability Representative Organisation representing the rights and interests of Australians with an intellectual disability and their families. Founded in 1954, Inclusion Australia's mission is to work to make sure people with an intellectual disability have the same opportunities as people without disability. It has state member organisations in New South Wales, Queensland, South Australia, Tasmania, Victoria and Western Australia, and a Northern Territory team based in Darwin.

NEDA is a national cross-disability Disabled Peoples' Organisation (DPO) governed by and comprised of people with disability from CALD backgrounds. NEDA works to protect and advance the human rights of all people with disability from CALD backgrounds.

Down Syndrome Australia was established in 2011 as the peak body for people with Down syndrome in Australia. Down Syndrome Australia's purpose is to influence social and policy change and provide a national profile and voice for people living with Down syndrome. Its vision is an Australia where people living with Down syndrome are valued, reach their potential, and enjoy social and economic inclusion.

Recommendations:

1. The Strategy must acknowledge and meet the needs of CALD people with an intellectual disability.

The information pack does not consider the experiences and needs CALD people with an intellectual disability as a cohort. The Strategy should give specific acknowledgement and consideration to CALD people with an intellectual disability —and investigate their experiences, expertise and needs to be embedded within the Strategy—to ensure culturally responsive disability services are available to all.

Given the Strategy is being codesigned with CALD people with disability, and presumably this includes CALD people with an intellectual disability, we recommend these stakeholders be engaged to consult specifically on the needs of CALD people with an intellectual disability and how their needs could be more meaningfully addressed by the Strategy.

In particular, the design and implementation of the Strategy can better meet the needs of CALD people with an intellectual disability by ensuring the following:

1.1 Provide Easy Read materials in all consultation processes in the development of the Strategy.

While the information pack outlining the learnings of the Discovery phase has been provided in Plain English and translated into 15 languages, there are no Easy Read materials available.

This means the current consultation process is not accessible to CALD people with an intellectual disability.

Priority solution 3: Accessible communications (page 2 of the information pack) highlights important considerations about the need for effective communication channels and formats.

We strongly recommend that the consistent provision of Easy Read materials be included in the goals of priority solution 3.

In addition, Easy Read materials should be provided in all future consultation processes in the development of the new CALD Strategy to ensure the expertise, views and experiences of CALD people with an intellectual disability are included. This will significantly strengthen the Strategy overall.

Easy Read materials should be provided in English as a minimum requirement, given that visuals alone can be very useful for people with an intellectual disability whose first language is not English. However, additional language translations of Easy Read should also be strongly considered.

Providing Easy Read materials would be very helpful in ensuring our community can engage in the consultation process and strengthen the Strategy overall through having the opportunity to contribute their expertise, views and experiences.

1.2 Ensure NDIS data captures people with an intellectual disability in CALD communities so that services can be more targeted and culturally responsive.

We are pleased to see Data listed as a priority solution that the Strategy will address to enable the provision of better information about NDIS participants from CALD backgrounds.

We recommend making an addition to the goals listed to include data on CALD people with an intellectual disability. This will give the NDIS a better understanding of their CALD participants in general and guide better targeted support services.

2. Include a mechanism for engaging with CALD families and communities to increase opportunities for NDIS participation for those who want it.

As is well known, NDIS participation from CALD people with disability is lower than expected. While the NDIS has seen a 12% increase in participants in the last 12 months, the number of CALD participants has remained stagnant in that time, between 9.1% and 9.3%, which is less than half of the stated benchmark of 18.9% (based on 2016 census data).¹

The Strategy should include a mechanism for establishing greater trust and connection to CALD communities to increase opportunities for CALD people with disability to access to the NDIS.

One mechanism for the co-design team to consider might be the National Community Connectors Program (NCCP). NEDA, as well as the Federation of Ethnic Communities' Councils of Australia (FECCA) have in the past recommended that the NDIA recommits to the NCCP and resume the program to increase support for CALD people with disability wanting to access the NDIS.²

The NCCP showed that the complexity of barriers faced by CALD people with disability can be overcome with culturally responsive navigation support. Further, a key learning from the NCCP was the importance of trust as a key driver in uptake of supports and services when people need them.³

The NCCP, or a similar program, should be included in the Strategy as a fully and sustainably resourced mechanism for increasing NDIS participation among CALD people with disability who wish to access the NDIS. This mechanism also needs to recognise various communities' preferences for communications and engagements—including face-to-face, at accessible/preferable community-centred venues, and including appropriate communication supports.

This will also help to gather meaningful information and experiences from CALD people with disability and their families and wider communities. CALD families with members with disability have told us about the multifaceted experiences they have, and establishing a sustainable and culturally responsive mechanism for gathering these stories will assist the NDIS in meeting the needs of CALD people with disability and continually improving services. This story, shared with us by a member of our community, offers an example of the complexities in peoples' experiences in relation to intergenerational understandings of disability:

¹ NDIS. Participant Data Q2 FY22/23. Retrieved from: <https://data.ndis.gov.au/explore-data>

² Federation of Ethnic Communities' Councils of Australia. *2023-24 Pre-Budget Submission*. Retrieved from: <https://fecca.org.au/wp-content/uploads/2023/02/FECCA-2023-24-Pre-Budget-Submission.pdf>; NEDA, PWDA and FECCA. *Joint Submission to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability: The Experiences and Perspectives of People with Disability from Culturally and Linguistically Diverse Backgrounds*. October 2021. Retrieved from: <http://neda.org.au/sites/default/files/2021-11/NEDA-CALDReport211102%20-%20Low%20Res.pdf>

³ Federation of Ethnic Communities' Councils of Australia. *2023-24 Pre-Budget Submission*. Retrieved from: <https://fecca.org.au/wp-content/uploads/2023/02/FECCA-2023-24-Pre-Budget-Submission.pdf>, p. 7.

The mother of a young girl with Down syndrome told us her mother (the child's grandmother) has never used the term Down syndrome with respect to her granddaughter – instead, she tells people her granddaughter has an extra chromosome. Some family members are using key word sign with the child, but her grandparents and other extended family refuse to learn and use it. Her grandmother often asks why there are so many people with disability in Australia. The child's mother explained that in their country in South East Asia, people with disability are hidden away, or were 30 years ago when their family moved to Australia.

The stories and experiences of CALD people with disability offer meaningful expertise that will assist in the continued improvement of services. The Strategy must include a sustainable mechanism for connecting with communities on their terms and facilitating ongoing consultation.

3. Recognise Early Childhood Intervention as a priority area to reach CALD people with disability.

We recommend that Early Childhood Intervention be considered as a key area for the CALD Strategy through which to target CALD families to increase participation in the NDIS for those who want it and create more culturally responsive services, given that a majority of CALD families with a family member with disability would be in this cohort. For example, children of migrant or refugee families who are born in Australia.

While there is still a gap between the expected and actual number of children with disability from CALD backgrounds in the NDIS—8% compared to the expected benchmark of 13.8%⁴—we can surmise that the gap is less than that of the adult population.

A focus on this area would also presumably allow for greater inclusion of children with an intellectual disability from CALD backgrounds: according to the 2018 ABS data, those aged 0-14 account for approximately 58.6% of people with an intellectual disability.⁵

Furthermore, NEDA has determined approximately 18,193 children aged 0 to 14 years with an intellectual disability are participants in the scheme.⁶ We could presume a similar trend exists for children with an intellectual disability from a CALD background born in Australia with a congenital disability, meaning this cohort would include a majority of overall CALD participants.

It should also be noted that the NDIS does not count CALD people born in Australia in their reporting. Allowing for this consideration, NEDA asserts that 12,200 CALD children 0-14 with a congenital disability, yet, using NDIS definition of CALD only 3,700 children in Australia.

We therefore strongly endorse using a definition of CALD that supports the collection of useful and accurate data that also captures CALD people who were born in Australia.

4. Streamline services for people who may be on different visa types

⁴ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. Transcript of Proceedings, Day 5, Friday 28 October 2022. page 349-351. Retrieved from: <https://disability.royalcommission.gov.au/system/files/2022-11/Transcript%20Day%205%20-%20Public%20hearing%2029%2C%20Melbourne.pdf>

⁵ ABS 2018, Brian Cooper, NEDA.

⁶ 30 June 2020 NDIA Report.

CALD people with disability have reported the confusing system navigation associated with different allowances based on different Visas. This should be taken into account in the Strategy to devise ways of streamlining services where possible and providing extra support for people to navigate these cross-agency issues.

Conclusion

We thank the NDIS for the opportunity to contribute and hope the recommendations provided assist in ensuring the priorities and goals of the Strategy—as well as the consultation process itself—are accessible and meets the needs of CALD people with an intellectual disability.

We welcome any further opportunities to consult on the Strategy, particularly where greater input from CALD people with an intellectual disability and their family members would be valuable.

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