



5 November 2015

Office for Disability Issues
P O Box 1556
Wellington

Tēnā koe

Re: Second consultation: Disability Action Plan Update

The New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on the Office for Disability Issues second consultation on the Disability Action Plan update.

NZNO has consulted its members and staff in the preparation of this submission, in particular our professional nursing, industrial, policy, research and legal advisers, Te Runanga, Regional Council and Board members and members of our specialist Colleges and Sections.

NZNO is largely supportive of the proposed updates to the action plan but would like the Office to note a number of points in regard to the Actions within the plan and other issues regarding these.

The Action plan, building on the National Strategy, launched in 2014 to acclaim within the disability sector and beyond is a fundamental step change towards meeting the *“implementation of the UN Convention on the Rights of Persons with Disabilities (CRPD) and the New Zealand Disability Strategy.”* As such, the absolute requirement for consultation and involvement of people with disabilities and their organisations (where led by disabled people themselves) is a cornerstone of the plan. The action plan is wide ranging – covering education, housing, social welfare support mechanisms and funding, accessible civic buildings, accessible public transport, and accessible and inclusive civic and political life.

A desire to “mainstream” education, housing and benefits – alongside access to education and employment to enable people with disabilities to fully partake of all aspects of life non-disabled New Zealanders take for granted – is a worthy aspiration: however, without detail on the mechanisms and funding to ensure people with disabilities are not further disadvantaged by lack of adequate support, it is unclear how the actions will actually be achieved. In particular, “mainstreaming” has the potential, in the name of treating all

equally, to lose specialist knowledge and skills built up in the sector. For example, the specialist skills of learning disability nurses have largely been lost to the sector.

There are also concerns from some in the education sector that the additional support and resources required to best provide for the needs of children and young people with learning difficulties and intellectual disability in mainstream schools has not / will not materialise; to the detriment of all.

The pilots and roll out of the Individualised Funding programme (IF evaluation report.pdf) indicate that from the perspectives of people with disabilities and their families at least, the improved flexibility and choice is working well and leading to more person-centred services and service delivery. The role of intermediate agencies, and of advocate/navigators was found to be critical.

Largely missing from all aspects of the larger disability model (the Strategy, the Action Plan, the Annual Review and the evaluation of the IF programme) however is **any** analysis of the implications for the disability and specialist workforce, or of the career pathways, adequate employment opportunities, educational and competency frameworks required to ensure that the needs of people with disabilities are well provided by safe and competent workers, and that the workforce is able to attract and retain the right calibre of worker to ensure continuity and sustainability.

NZNO would also like to register our concern regarding the time frames for consultation of both the first and second consultations. Two weeks is insufficient time to undertake a robust consultation process and we point the Office in the direction of the State Services Commission that recommends a realistic timeframe for consultation and the Ministry of Health who recommend a six week consultation period for public sector consultation: [http://www.moh.govt.nz/notebook/nbbooks.nsf/0/7DA9155B78CF5A05CC257A990002EE58/\\$file/consultation-guidelines-links.pdf](http://www.moh.govt.nz/notebook/nbbooks.nsf/0/7DA9155B78CF5A05CC257A990002EE58/$file/consultation-guidelines-links.pdf).

NZNO has the the following comments to make regarding specific points in the Action Plan:

Shared result: Increase employment and economic opportunities

NZNO note the removal of *point 1: increase the educational achievement of disabled children and adults*. While we accept this will move to a single agency led process, it is essential to ensure there is funding for extra support staff with the right skills.

2. Priority: Increase the number of disabled people who transition from school and from tertiary education into employment.

NZNO support this priority and note the need for ensuring access to support services in Tertiary education as well as school.

a) Improve transitions. Lead: Ministry of Education.

This will require coordination and support.

4. Priority: Increase the number of employers who are confident in employing disabled people, with the public sector taking a lead.

- a) *Government to take a lead in employing disabled people and providing paid internships. Lead: Office for Disability Issues.*

NZNO are pleased to see a lead being taken, but note that “costs” to the public sector (as would be the case for private) should be recognised in the initial parts of the scheme till employer confidence is built.

Shared result: Ensure personal safety

5. *Priority: Reduce barriers to disabled people making decisions to determine their own lives.*

- a) *Ensure disabled people can exercise their legal capacity, including through recognition of supported decision making. Lead: Office for Disability Issues.*

NZNO note that the provision of appropriately knowledgeable “navigators” to genuinely enable this is essential and recommend specific reference to this is included.

6. *Priority: Reduce the number of disabled children and adults who are victims of violence, abuse or neglect.*

NZNO recommend this become the highest priority in the Action Plan.

Shared result: Transform the disability support system

10. *Priority: Increase the capability of disability support service providers to be of service to disabled people.*

- a) *Develop and implement effective ways for disabled people and DPOs to provide feedback (both qualitative and quantitative) safely about the quality of services and support and to monitor, evaluate, and scrutinise and make providers accountable to funders for achieving outcomes. Lead: Ministry of Health.*

- b) *Ensure providers are responsive to disabled people and provide choice and tailoring of services. Explore how provider performance should be assessed, including through accreditation, provider performance measurement, and contract monitoring systems. Lead: Ministry of Health*

NZNO point out that neither of these actually increase capability. NZNO recommend the inclusion of reference to access to safe staffing, including staff with appropriate education and experience, and permanent well paid employment to increase continuity.

Shared result: Promote access in the community

11. *Priority: Increase government services’ responsiveness to disabled people.*

- c) *Increase access to health services and improve health outcomes for disabled people with a specific focus on people with learning/intellectual disabilities. Lead: Ministry of Health.*

NZNO note the importance of ensuring appropriate training and funding is present along with the importance of system navigators and translators. NZNO strongly support the inclusion of the new action points *h) Develop a framework for understanding the costs of disability and the mechanisms for meeting these;* and *i) Investigate how the Government can utilise the whānau ora initiative as an alternative option for disabled persons who prefer a whānau and community inclusive approach to government services.*

13. Priority: Promote disabled people participating in political and civic processes.

a) DPOs to complete a stocktake of what are the areas needing the most attention and which will make the biggest difference to promote disabled people participating in political and civic processes. ODI will convene a discussion with DPOs and relevant government agencies to discuss priorities from the DPOs stocktake and identify possible actions. Lead: DPOs.

NZNO notes DPOs need funding and support to do this important work: a theme for all the responses to this review. NZNO recommends one of the first action points for the plan should be regarding ensuring appropriate funding is available for implementation.

All of the above are crucial to fair and necessary access to services and everything else we need in life to be able to fully participate. NZNO agree with previous submitters that the actions are vague, with no measurable outcomes, work plans or timeframes. A stocktake without commitment to implement findings feels like another delaying tactic and hurdle. NZNO recommend we start with some of the obvious things that will help all people: improving access (physical, sensory, attitudinal) for people with disabilities also helps the elderly, those with prams and so on. Transport in particular is absolutely necessary for independence, travel to work, and access to services. The additional costs of wheelchair taxis to work can be prohibitive.

NZNO thanks The Office for Disability Issues for the opportunity to comment on the second consultation on the Disability Action Plan update.

Nāku noa, nā



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NEW ZEALAND NURSES ORGANISATION (NZNO)

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand. NZNO represents over 46,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment related matters. NZNO is affiliated to the International Council of Nurses and the New Zealand Council of Trade Unions.

NZNO promotes and advocates for professional excellence in nursing by providing leadership, research and education to inspire and progress the profession of nursing. NZNO represents members on employment and industrial matters and negotiates collective employment agreements.

NZNO embraces Te Tiriti o Waitangi and contributes to the improvement of the health status and outcomes of all peoples of Aotearoa New Zealand through influencing health, employment and social policy development enabling quality nursing care provision. NZNO's vision is *Freed to care, Proud to nurse.*