



Scan for
NZSL name



Visual description: A purple Whaikaha - Ministry of Disabled People logo. On the left is a QR code and underneath the words 'scan for the NZSL name'.

Feedback Form

The Ministry of Disabled People – Whaikaha is consulting on the draft New Zealand Disability Strategy 2026-2030.

We welcome your feedback and comments on the draft strategy. There are four sections. You can complete the whole form or the sections that are of most interest to you. Please complete section 1: About you.

Once you have completed the form please:

- email to disabilitystrategy@whaikaha.govt.nz
- post free of charge to:

New Zealand Disability Strategy Consultation
Whaikaha – Ministry of Disabled People
Reply paid 262204
PO Box 1556
Wellington 6140

Section 1: About You

1. Are you giving feedback as **(Please select by putting X next to the option that applies, or removing the options that don't apply)**:

- ☐ Yourself
- ☐ Someone else
- ☐ A group
- ☒ An organisation

2. What is the name of the group or organisation you are submitting feedback on behalf of? **(please write your response below)**

Volition Solutions Limited.

Volition is a social enterprise on a mission to empower everyone to be a decision maker in their own life. We achieve this through developing accessible technologies for greater self-determination of disabled people.

Please complete the following questions as though you are the person you are completing the form for.

3. Do you identify as a disabled person? **(Please select by putting X next to the option that applies, or removing the option that doesn't apply):**

☐ Yes

☒ No

4. Do you identify as tāngata whaikaha Māori? **(Please select by putting X next to the option that applies, or removing the option that doesn't apply):**

☐ Yes

☒ No

5. If yes to question 3 or 4, what types of impairment or lived experience apply to you? **(Please select by putting X next to all that apply, or listing all that apply)**

☐ Physical

☐ Hearing or auditory

☐ Visual

☐ Speech

☐ Learning, cognitive or neurological

☐ Other:

6. Are you a carer or family member of a disabled person? **(Please select by putting X next to the option that applies, or removing the option that doesn't apply):**

- ☒ Yes
☐ No

7. What is your age group? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- ☐ Under 15 years
☐ 15–29 years
☒ 30–44 years
☐ 45–64 years
☐ 65–74 years
☐ 75 years or over

8. What is your gender? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- ☐ Male
☒ Female
☐ Another gender
☐ Prefer not to answer

9. Which ethnic group(s) do you belong to? **(Please select by putting X next to all that apply, or listing all that apply)**

- ☒ New Zealand European
☐ Māori
☐ Samoan
☐ Cook Islands Māori
☐ Tongan
☐ Niuean
☐ Chinese
☐ Indian
☐ Other:

Section 2: Vision and Principles

The strategy will have a vision. This is a statement describing the future that disabled people want to achieve through the strategy.

The **proposed vision** is:

New Zealand is an accessible and equitable society for disabled people and their whānau – a place where disabled people thrive, lead and participate in all aspects of life.

10. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with the following statements about the **vision**?
(Please select by putting X next to the option that applies, or removing the options that don't apply):

- The **vision** is clear and easy to understand.
 - ☐ Strongly disagree
 - ☒ Disagree
 - ☐ Neither agree nor disagree
 - ☐ Agree
 - ☐ Strongly agree
- The **vision** aligns with the values and aspirations of disabled people.
 - ☐ Strongly disagree
 - ☐ Disagree
 - ☐ Neither agree nor disagree
 - ☒ Agree
 - ☐ Strongly agree
- I feel confident the **vision** will lead to meaningful change.
 - ☐ Strongly disagree
 - ☒ Disagree
 - ☐ Neither agree nor disagree
 - ☐ Agree
 - ☐ Strongly agree

11. Do you have any further comments or suggestions about the **vision? (please write your response below)**

- The vision has complex sentence structure and word choice. The vision itself should exemplify accessibility and not just espouse it.

Recommendation:

That the standard version of the vision be drafted following the principles of Easy Read, not just have an Easy Read alternate format available.

- Generally speaking it is sufficiently broad and aspirational to capture and reflect the values and aspirations of disabled people.
- It holds merit when viewed in isolation, as a stand-alone vision articulated in 2025.

When viewed in relation to the visions articulated in previous disability strategies however, there appears to be a glaring omission, most notably the emphasis on society's collective responsibility and action.

Compare with the 2016 – 2026 strategy's vision: "New Zealand is a non-disabling society – a place where disabled people have an equal opportunity to achieve their goals and aspirations, and all of New Zealand works together to make this happen."

- The vision should acknowledge the centrality of choice and control in wellbeing.

Recommendation:

In the current phrasing of the vision this could be included as "New Zealand is an accessible and equitable society for disabled people and their whanau – a place where disabled people thrive,

lead and participate in all aspects of *living a good life of their choice.*”

Principles are the key values, ideas and commitments that underpin this strategy. The principles will help make sure the strategy reflects the things that are important to disabled people.

Seven **principles** have been proposed for the strategy. These are summarised below.

Accessibility

Fundamental to participation and inclusion. Accessible environments and services benefit everyone, not just disabled people.

Choice and control

Recognises that disabled people are experts in their own lives, and have the same right to self-determination as everyone else.

Equity, cultural inclusion and intersectionality

Acknowledges that disabled individuals have their own unique identities, and belong to diverse whānau, communities, and cultures.

Human rights

Anchor the strategy to international human rights frameworks, including the United Nations Convention on the Rights of Persons with Disabilities, the United Nations Declaration on the Rights of Indigenous Peoples, the United Nations Convention on the Rights of the Child, and the Universal Declaration of Human Rights.

Participation and inclusion

Recognises disabled people’s right to be active members of their communities and cultures in all aspects of life.

Respect and dignity

Emphasises that everyone deserves to be treated with respect, and acknowledges that societal attitudes can be a significant barrier for disabled people.

The Treaty of Waitangi | Te Tiriti o Waitangi

Establishes the relationship between Māori and the Crown, recognising the unique position of Māori as tāngata whenua, and ensuring partnership, participation and protection for tāngata whaikaha Māori.

12. On a scale from 1 (not at all important) to 5 (very important) how important is each of the following **principles**? (**Please select by putting X next to the option that applies, or removing the options that don't apply**):

- Accessibility

- ☐ Not at all important
- ☐ Not important
- ☐ Neutral
- ☐ Important
- ☒ Very important

- Choice and control

- ☐ Not at all important
- ☐ Not important
- ☐ Neutral
- ☐ Important
- ☒ Very important

- Equity, cultural inclusion, and intersectionality

- ☐ Not at all important
- ☐ Not important
- ☐ Neutral
- ☐ Important
- ☒ Very important

- Human rights

- ☐ Not at all important
- ☐ Not important
- ☐ Neutral
- ☐ Important
- ☒ Very important

- Participation and inclusion

- ☐ Not at all important
- ☐ Not important
- ☐ Neutral
- ☐ Important
- ☒ Very important

- Respect and dignity

- ☐ Not at all important
- ☐ Not important
- ☐ Neutral
- ☐ Important
- ☒ Very important

- The Treaty of Waitangi | Te Tiriti o Waitangi

- ☐ Not at all important
- ☐ Not important
- ☐ Neutral
- ☐ Important
- ☒ Very important

13. Is there anything you would like to add or remove from the list of **principles**? **(please write your response below)**

- Including Human Rights and The Treaty of Waitangi alongside the principles of Accessibility, Respect and Dignity, Participation and Inclusion, Choice and Control and Intersectionality is misrepresentative.

Human Rights and the Treaty of Waitangi are foundational and binding legal obligations upon the State. The other principles are values that should be consistently applied to give effect to the realisation of these obligations, and to the strategy itself.

They are similar only being crucial to the success of the strategy.

Recommendation:

That Human Rights (specifically the UNCPRD) and Te Tiriti o Waitangi be removed from the list of principles, and alternatively be referenced in the strategy as the foundational framework upon which the strategy is built, and which the other principles seek to enact.

Recommendation:

We also recommend that the strategy adopts the Enabling Good Lives principles which have already been developed and endorsed by the disability community.

14. Do you have any further comments or suggestions on the proposed **principles**? **(please write your response below)**

Section 3: Priority Outcome Areas

The strategy has five priority outcome areas: education, employment, health, housing and justice.

Each area has a goal, a description of what success means, a case for change, and a set of proposed actions to which the Government will commit to achieve success for disabled people.

You can provide feedback on all priority outcome areas or those of most interest to you.

Education

The **goal** for education is:

Every learner is supported to attend, participate and progress in education. There is a high expectation that all learners – including disabled learners – will achieve their potential in the education setting of their choice.

15. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with the **goal** for education? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

Summary of **what success in education means:**

Educators plan for diverse learners to succeed. The education system has high expectations for all disabled learners, focusing on their strengths and aspirations. Learning support is responsive, timely and effective, easy to navigate, and delivered by a skilled workforce. Early intervention happens at the right time and is effective.

Kaupapa Māori education settings have access to the right resources delivered by a capable workforce. Data is gathered to support and understand the progress of learners. Tertiary education providers are supported to implement disability action plans, with progress monitored.

16. On a scale (strongly disagree) to 5 (strongly agree) how much do you agree with the description of **what success in education means?** **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- ☒ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☐ Strongly agree

17. Do you have any further comments or suggestions on the **goal** or the **description of what success means?** (please write your response below)

- All of the descriptions of what success in education means are focused on inputs and outputs, rather than outcomes. They relate to changes in the education and learning support systems, rather than to greater participation, success, and satisfaction of learners.

The descriptions are therefore not bold, ambitious or specific enough in stating what success for disabled in education looks like.

Recommendation:

That the strategy rewrites the definition of success in education to focus on outcomes for disabled learners. Suggested outcomes could include:

- o An increase in the number of disabled learners attaining qualifications
- o An increase in the number of disabled learners staying in school to a certain age (targeting early leavers)
- o A decrease in the number of disabled learners staying in secondary school past a certain age (targeting failure to transition)
- o An increase in the number of disabled learners in tertiary settings

Of note: this is the only priority outcome area that makes this error in its definition of success. All other priority outcome areas define success in terms of the outcomes for disabled people.

In the draft New Zealand Disability Strategy there are **9 proposed education actions**.

18. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with each action? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- **Action 1:** Invest \$266 million to expand early intervention services to support the identification of learning support needs early in a child's life and reduce wait times for assessments and services.

☐ Strongly disagree
☐ Disagree
☐ Neither agree nor disagree
☐ Agree
☒ Strongly agree

- **Action 2:** Explore new options for targeted and specialised support and provisions to reduce wait times using private providers and non-government organisations (NGOs).

☐ Strongly disagree
☐ Disagree
☐ Neither agree nor disagree
☐ Agree
☒ Strongly agree

- **Action 3:** Make improvements to the learning support system so it is easier to navigate for educators, families and learners through: funding all schools with Year 1-8 students for a Learning Support Coordinator; and by reducing the complexity and accessibility of the application process.

☐ Strongly disagree
☐ Disagree
☐ Neither agree nor disagree
☐ Agree
☒ Strongly agree

- **Action 4:** Invest funding in additional learning support classrooms to provide choice for parents.

☐ Strongly disagree
☐ Disagree
☐ Neither agree nor disagree
☒ Agree
☐ Strongly agree

- **Action 5:** Work with the Ministry of Disabled People - Whaikaha to develop improvements in teacher training and guidance that support teachers to meet the needs of disabled students.

☐ Strongly disagree
☐ Disagree
☐ Neither agree nor disagree
☐ Agree
☒ Strongly agree

- **Action 6:** Work with the Ministry of Disabled People - Whaikaha to explore opportunities to improve accountability for schools through reporting on learning and achievement outcomes for disabled learners.

☐ Strongly disagree
☐ Disagree
☐ Neither agree nor disagree
☐ Agree
☒ Strongly agree

- **Action 7:** Support kaupapa Māori settings, within the existing Education budget, to access the resources, knowledge and capability to deliver high quality kaupapa Māori educational programmes that meet the needs of disabled ākonga (students) in a kaupapa Māori setting.

☐ Strongly disagree
☐ Disagree

- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

- **Action 8:** Work with the Ministry of Disabled People - Whaikaha to explore opportunities to identify disabled learners in education data collections.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

- **Action 9:** Continue implementation of the Tertiary Education Commission (TEC) mechanism for reviewing provider progress in implementation of disability action plans (which will be integrated into Investment Plans from 2027). The TEC will consult with disabled student representative groups, including the National Disabled Students' Association, on how the mechanism will be implemented.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

19. Do you have any further comments or suggestions on the proposed **actions**? **(please write your response below)**

- These actions are specific and measurable.

Employment

The **goal** for employment is:

Disabled people will have meaningful career opportunities, equal to non-disabled people, and be valued the same way. Disability-confident employers will recognise disabled people's talents and will provide accessible and inclusive workplaces throughout the employment lifecycle.

20. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with the **goal**? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☒ Agree
- ☐ Strongly agree

Summary of **what success in employment means**:

Disabled people have meaningful career, employment and self-employment opportunities, equal to non-disabled people. They have the right resources and support, and confidence their employer can help them to thrive at work, whether they are urban or rural, in a workplace or working remotely. Better work outcomes give disabled people more economic security, dignity, self-determination and choice.

21. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with the description of **what success in employment means**? **(Please select by putting X next to the**

option that applies, or removing the options that don't apply):

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☒ Agree
- ☐ Strongly agree

22. Do you have any further comments or suggestions on the **goal** or the **description of what success means? (please write your response below)**

In the draft New Zealand Disability Strategy there are **6 proposed employment actions** to reach the goal.

23. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with each **action**?

- **Action 1:** Work to centralise, and make accessible, information and guidance for disabled people to identify and pursue job pathways matched to their skills and interests.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☒ Agree
- ☐ Strongly agree

- **Action 2:** Review specialist employment supports to improve employment outcomes, in consultation with disabled people.

- ☐ Strongly disagree
- ☐ Disagree

- ☐ Neither agree nor disagree
- ☒ Agree
- ☐ Strongly agree

- **Action 3:** Work with disabled people, employers and employer networks to develop mentorship programmes connecting disabled people with successful disabled professionals or employers to provide guidance and support in navigating their careers.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☒ Agree
- ☐ Strongly agree

- **Action 4:** Partner with disabled people and support providers to create a centralised, accessible repository of practical information and resources for employers and employer networks so they can support disabled people throughout the employment lifecycle and to share knowledge and success stories.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☒ Agree
- ☐ Strongly agree

- **Action 5:** Partner with disabled people, employers and employer networks to improve accessibility and inclusion in employment lifecycles for disabled people. This includes promoting and enabling the design of jobs and workplaces to support:
 - inclusion of disabled people
 - flexible working arrangements and reasonable accommodations
 - assessing the accessibility of workplaces.

- ☐ Strongly disagree
- ☐ Disagree

- ☐ Neither agree nor disagree
- ☒ Agree
- ☐ Strongly agree

- **Action 6:** Implement a targeted, ongoing awareness campaign publicising guidance and resources for employers and employees on accessibility and inclusion, relevant data and reports, and highlighting the positive impact disabled people have had on workplaces. This action will support employment action 4.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☒ Agree
- ☐ Strongly agree

24. Do you have any further comments or suggestions on the proposed **actions**? **(please write your response below)**

- Any consideration of success in employment must also consider success in compensation, and the need to abolish minimum wage exemptions

Health

The **goal** for health is:

Disabled people will achieve the highest possible standard of health and wellbeing. They will decide what this means for themselves and their whānau.

25. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with the **goal**? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree

- ☒ Agree
☐ Strongly agree

Summary of **what success in health means**:

The health system enhances quality of life for disabled people.

Self-determination means disabled people can make informed choices and have their decisions respected. Tāngata whaikaha Māori are understood as part of a collective and can involve whānau in their health in the ways they want.

Accessibility, equity and inclusion are embedded throughout the health system, supported by a skilled and responsive health workforce.

This includes disabled people at every level. Better data is collected and used for system improvement.

26. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with the description of **what success in health means**? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- ☐ Strongly disagree
☐ Disagree
☐ Neither agree nor disagree
☒ Agree
☐ Strongly agree

27. Do you have any further comments or suggestions on the **goal** or the **description of what success means**? **(please write your response below)**

- Success in health should also describe an emphasis on prevention.
- While it is important for disabled people to define for themselves and their whānau what the highest possible standard of health

looks like, there is also some objective and universal indicators of health that could be considered. This is particularly relevant where a person's capacity or limited experience may result in having an overly low standard for their personal health.

- The description of success should also include wellbeing, since wellbeing is included in the goal.

In the draft New Zealand Disability Strategy there are **5 proposed health actions** to reach the goal.

28. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with each action? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- **Action 1:** Review and improve policies and practices, so the health journey is equitable, accessible and inclusive. This review will include all interactions with the health system, covering communication, information, technology, decision-making, service design and delivery, and the built environment.

Self-determination should be a key consideration of the review. This includes making tools for self-determination and supported decision-making standard practice in health care – especially for people with different communication, cognitive or psychosocial needs.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

- **Action 2:** Build health workforce capability to deliver services that are inclusive, culturally safe, and easy to navigate.

Building workforce capability includes increasing the proportion of disabled people across the health and disability workforce, through recruitment and workplace policies, inclusive and accessible work environments, and career development. It also includes embedding disability responsiveness and lived experience into health workforce training and ongoing professional development.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

- **Action 3:** Create opportunities to build disabled people's skills and knowledge to take up health system roles.

Government agencies will create opportunities to build the capability and capacity of disabled people to carry out health system roles. These roles will include health system design, consultation, monitoring, leadership, advisory and governance roles.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

- **Action 4:** Identify disabled people in national health data.

Identifying disabled people in data will make them more visible in the health system. It will enable better monitoring of population health outcomes and patient experiences.

- ☐ Strongly disagree

- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

- **Action 5:** Implement systems to enable disabled people to record their accessibility needs against their National Health Index.

Recording people's accessibility needs will mean these needs can easily be shared with health providers. Disabled people will not have to repeat their accessibility needs each time they engage with health services, and health providers will be better placed to plan and meet those needs.

Work to progress this action should be guided by disability community expectations and data sovereignty.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

29. Do you have any further comments or suggestions on the proposed **actions**? **(please write your response below)**

- This strategy and actions should be coordinated with the updated emphasis on supported decision making in health and disability services from the Health and Disability Commission following their recent review of the Code of Consumer Rights. In particular, their intention to develop guidance, education and resources on supported decision making aligns with Action 1 and Action 2.
- We echo the call from IHC Advocacy for a nationally funded annual health check for DSS funded adults with learning

disabilities. Their extensive research, data, and projections on the compounding benefits of annual health checks have evidenced the fiscal and societal benefits of this programme.

- In conjunction with Action 4, we likewise ask that Government acts now with the data set that currently exists to fund more analysis and insights on the health of disabled people. IHC Advocacy has taken community leadership in this area with the Data to Dignity Report and their work with the IDI, but this should be a Government funded work programme.
- Volition welcomes Action 5 to implement systems to capture accessibility needs against an NHI number. As a social enterprise using technology as an enabler, this is something that Volition has already built the infrastructure for. Government must consult with suitable agencies and experts to ensure appropriate and suitable commissioning and that there is no duplication of effort.

Housing

The **goal** for housing is:

Disabled people and their whānau will have affordable, healthy, secure and accessible homes that meet their needs.

30. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with the **goal**? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

A summary of **what success in housing means** is:

Disabled people have a range of suitable housing options in the community, so they can choose where they live. They enjoy secure tenure in housing, can move if they want, and do not experience delays accessing housing when leaving hospital inpatient care.

The housing sector meets accessibility needs, and the supply of accessible housing meets demand, with monitoring in place. Urban design and planning create accessible neighbourhoods. Suitable housing improves disabled people's outcomes and protects against harm, neglect, violence and abuse.

31. On a scale (strongly disagree) to 5 (strongly agree) how much do you agree with the description of what success in housing means? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

32. Do you have any further comments or suggestions on the **goal** or the **description of success**? **(please write your response below)**

- The description of success should include that disabled people are safe in their homes.
- With Human Rights as part of the foundational framework for the strategy (see earlier comments regarding the principles), success should also include the reduction or elimination of group homes.

In the draft New Zealand Disability Strategy there are **6 proposed housing actions** to reach the goal.

33. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with each action? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- **Action 1:** Develop, consult on, and make publicly available, clear definitions of accessible homes, describing the key features of different levels of accessibility (for example, from basic universal design through to fully accessible).

Clear definitions of accessible homes can support the development of voluntary guidelines for accessibility for residential dwellings (housing action 6).

- ☐ Strongly disagree
☐ Disagree
☒ Neither agree nor disagree
☐ Agree
☐ Strongly agree

- **Action 2:** Improve data matching between disabled people and social housing properties with accessible features that meet their needs and ensure disabled people and their whānau are prioritised to accessible properties. Data matching will both identify disabled people's housing needs and social housing that meets those needs.

- ☐ Strongly disagree
☐ Disagree
☐ Neither agree nor disagree
☐ Agree
☒ Strongly agree

- **Action 3:** Identify possible barriers to increasing supply of accessible houses in the private market and investigate opportunities to remove those barriers. Understanding barriers to the supply of accessible housing will help target potential interventions to improve supply.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

- **Action 4:** Review and explore ways to improve the housing modification system. Addressing inefficiencies in the housing modification system could reduce current problems: inaccessibility of homes, increased costs, and health and safety issues for disabled people, whānau and carers.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☒ Agree
- ☐ Strongly agree

- **Action 5:** Gather annual data on the housing-related needs of disabled people and compare this to what is being built in each region, to influence the housing market to build and make available more accessible housing.

Data will increase developers' awareness of the housing-related needs of disabled people and raise the profile of the demand for accessible homes.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

- **Action 6:** Develop voluntary national guidelines on accessibility for residential dwellings. Guidelines would be based on the definitions for accessible homes in housing action 1 and would set out best practice guidance for how to build accessible homes.

- ☒ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☐ Strongly agree

34. Do you have any further comments or suggestions on the proposed actions? **(please write your response below)**

- Our accessible housing crisis will not be solved with voluntary guidelines (Action 6). Guidelines should still be developed, but these should include requirements for the percentages of new builds that must meet the guidelines, and a regime for enforcement of such.
- There is an opportunity here for the substantial action to focus on the separation of housing from service provision.

Justice

The **goal** for justice is:

Disabled people's human rights and freedoms will be protected, and their disability rights will be realised. Disabled people will be treated fairly and equitably by the justice system. Justice system policies and practices will embed accessibility, inclusion and lived experience.

35. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with the goal? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

A summary of **what success in justice means** is:

Disabled children, young people and adults in care are safeguarded from abuse, neglect and violence. Disabled children and young people are supported to avoid the care and protection or youth justice systems.

Disabled people who interact with the youth justice or criminal justice systems have their rights and accessibility needs considered and get support to transition out. Those charged with an offence but unable to stand trial are treated consistently with the New Zealand Bill of Rights Act. Justice sector workforces have the skills to uphold disabled people's rights.

Disabled parents in Family Court will have equitable access to family justice services.

36. On a scale (strongly disagree) to 5 (strongly agree) how much do you agree with the description of **what success in justice means? (Please select by putting X next to the option that applies, or removing the options that don't apply):**

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☒ Agree
- ☐ Strongly agree

37. Do you have any further comments or suggestions on the **goal** or the **description of success? (please write your response below)**

- The State has an obligation to safeguard all disabled children, young people and adults, not just those "in care." This is included in article 12 of the UNCRPD, and human rights are part of the foundational framework for this strategy (refer to comments on the principles).

- There are varying interpretations of the word 'safeguarding,' so it is critical that a modern and holistic definition of safeguarding is included in the strategy that communicates that "safeguarding is a range of activities and responses that promote and protect human rights, wellbeing and culture, *and* prevent, reduce or eliminate harm, abuse and neglect."
- The equitable treatment of disabled people in the Family Court must extend beyond the experience of disabled parents, and include Family Court interactions where the disabled person is the "subject person."

Recommendation:

That the goal for Justice include the phrasing that disabled people are *identified*, treated fairly and equitably by the justice system.

In the draft New Zealand Disability Strategy there are **7 proposed justice actions** to reach the goal.

38. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do you agree with each action? (**Please select by putting X next to the option that applies, or removing the options that don't apply**):

- **Action 1:** Develop and implement a safeguarding framework for disabled people in long-term detention settings (such as prisons and youth justice residences) and Disability Support Services funded residential facilities. The framework will include preventing, reporting, responding, and safely removing disabled people from abusive situations.
- ☐ Strongly disagree
- ☐ Disagree
- ☒ Neither agree nor disagree

- ☐ Agree
- ☐ Strongly agree

- **Action 2:** Establish a cross-agency project to identify and address gaps in data and evidence about disabled people's experiences of crime, including for disabled people in residential and secure facilities, and experiences of cyberbullying.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☒ Agree
- ☐ Strongly agree

- **Action 3:** Develop a social investment plan for early intervention and support, to reduce the number of disabled children and young people entering the youth justice system.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

- **Action 4:** The Law Commission has been asked to undertake a review of the Criminal Procedure (Mentally Impaired Persons) Act 2003 (CPMIP). This review is expected to consider the CPMIP's relationship to other relevant legislation, such as the Intellectual Disability (Compulsory Care and Rehabilitation) Act 2003 and Mental Health (Compulsory Assessment and Treatment) Act 1992.

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

- **Action 5:** Review, as work programmes allow, the effectiveness of current protections for disabled people in family law, including adoption, guardianship and personal property rights, to identify gaps where strengthened provisions or support are needed. Any review should also consider supported decision-making and use of plain language in key justice sector legislation and processes. Consideration should be given to reviewing human rights legislation, as work programmes allow.

☐ Strongly disagree

☐ Disagree

☐ Neither agree nor disagree

☐ Agree

☒ Strongly agree

- **Action 6:** Integrate lessons from disability-specific safeguarding approaches into the development of the future state for multi-agency responses to family violence, to strengthen outcomes for disabled people experiencing violence and abuse. This includes supporting workforce capability to ensure a coordinated, safe and disabled-person centred response.

☐ Strongly disagree

☐ Disagree

☐ Neither agree nor disagree

☐ Agree

☒ Strongly agree

- **Action 7:** Develop and implement a plan to make the justice sector workforce more disability competent, including in the use of mana and trauma informed practices. This plan would include increasing recruitment and retention of disabled people and should consider mandatory professional standards.

☐ Strongly disagree

☐ Disagree

- ☐ Neither agree nor disagree
- ☐ Agree
- ☒ Strongly agree

39. Do you have any further comments or suggestions on the proposed **actions?** (**please write your response below**)

- Action 1: The principles for safeguarding disabled people and adults at risk that are inside detention settings should be the same as the principles for safeguarding disabled people and adults at risk that are outside of detention settings. As such, we recommend the application and extension of the existing Safeguarding Framework developed for application in the Mid-Central demonstration of Enabling Good Lives, to apply to all disabled people and adults at risk, in all residential settings (both private, faith and state based care settings, and detention settings).

There must also be explicit focus on reducing the number of disabled people who are held on remand.

- Action 3: Is in line with the Enabling Good Lives principle of beginning early. All of the EGL principles are evident throughout the strategy, and should be explicitly identified as such.
- Action 5: The language of “review, as work programmes allow” facilitates inaction. There has been already been extensive review of the current ‘protections’ in family law through the Law Commission review of adult capacity law. Once published, their findings and recommendations can be extrapolated across all family law contexts. This plan should alternatively focus on tangible and measurable actions that are borne out of these reviews.

Rights and provisions for the ‘subject person’ to participate in court proceedings, including in giving evidence, should be strengthened.

- Action 6: There have been several safeguarding pilots, working groups, and initiatives to further the Safeguarding of Adults at risk in New Zealand. Learnings from previous work must be synthesized and incorporated into future work programmes.
- Action 7: Must include training of legal professionals, with particular emphasis on the development of professional standards for lawyers that are appointed to act for the 'subject person' under PPPR act. Their performance must be monitored and evaluated.

Section 4: Overall Comments

40. On a scale from 1 (strongly disagree) to 5 (strongly agree) how much do agree with the following statement? **(Please select by putting X next to the option that applies, or removing the options that don't apply):**

- The strategy will lead to meaningful change.
 - ☐ Strongly disagree
 - ☐ Disagree
 - ☒ Neither agree nor disagree
 - ☐ Agree
 - ☐ Strongly agree
- This response is largely based on the degree to which meaningful change has been achieved through previous strategies and action plans.

41. Is there anything else you would like to see in the strategy? **(Please select by putting X next to the option that applies, or removing the option that doesn't apply):**

☒ Yes

☐ No

42. If yes, please write your response below:

In addition to the additions already noted above:

- The strategy needs to have explicit acknowledgement of the role of families, whānau and carers in supporting the wellbeing of disabled people. Similarly the action plans should have explicit regard to supporting families, whānau and carers in these roles.
- The strategy must also including bind obligations across Government to ensure it survives the upheaval of a change of party in power.

43. Any other comments or suggestions? **(please write your response below)**

- This is the third disability strategy in New Zealand. Our strategies should be maturing in both approach and ambition, and yet the current strategy reflects substantially the same detail as former iterations. This may be an indicator of inefficient execution, or the whole endeavour being a tokenistic exercise.
- We believe that having a five year horizon for the realisation of actions and outcomes is wise, and will likely result in greater progress.
- We also commend the incorporation of the strategy and action plan into a single document. This is simple, practical, and we hypothesise, more effective.

- We express some caution about the alignment between Disability Strategy priority outcomes, and Government targets. The advancement of disability rights, accommodations, and wellbeing should be independent of political agendas and the regime of the day.

Disability Strategy	Health	Education	Employment	Housing	Justice	
Govt Target	Health	Education	Work	Housing	Law and Order	Environment

- We likewise acknowledge the politically influenced exclusion of a Tāngata Whaikaha Māori specific strategy or action plan. This seems to contradict the Strategy's principle of The Treaty of Waitangi, and the recognition of the unique position of Māori as tāngata whenua and as having a distinct voice to define success and wellbeing for themselves.
- The system and accountability for how Whaikaha will measure progress against the strategy is not thorough enough. The public consultation document should include a preliminary indication of which Government agencies are responsible for each action, but cross Government collaboration is also required on a large scale.
- The 5 or 6 key indicators that the Ministry has identified to support their measurement of progress should be circulated for public consultation with the broader strategy. By some interpretations, the descriptions of what success looks like for each priority are could themselves be considered indicators.
- Any dashboard that is built to visualise progress must be accessible to disabled people and updated in real time.
- Two matters of formatting:

- o The current placement of “The case for change” within each priority area feels disjointed. This information is relevant and important context, and if anything should come before the goal, descriptions of success, and actions. Placing it in the middle of the material disrupts the flow.
- o There is value in showing the corresponding success areas listed underneath each action, but there is also value in seeing each action listed under each success area. Cross referencing in this way helps to communicate which success areas are expected to have the most targeted focus and resource.

We are happy to discuss or clarify our response as needed.

This submission has been prepared by Erika Butters, Founder and CEO of Volition.

Erika.Butters@Volition.org.nz

027 359 6747