



**PEOPLE WITH DISABILITY
AUSTRALIA**

**A voice
of our
own**

Budget measures for long-term accessible, inclusive and equitable reforms for people with disability

Pre Budget Submission to the Australian Treasury for the
2025 26 Federal Budget

JAN
2025

Copyright information

Budget measures for long-term accessible, inclusive and equitable reforms for people with disability: Pre-Budget Submission to Australian Treasury for the 2025-26 Federal Budget

First published in 2025 by People with Disability Australia Ltd.
Suite 10.01 Centennial Plaza | Level 10, 300 Elizabeth Street Surry Hills, New South Wales, Australia 2010

Email: pwd@pwd.org.au

Phone: +61 2 9370 3100 Fax: +61 2 9318 1372

URL: www.pwd.org.au

Typeset in Arial 12 pt and VAG Rounded 26 and 16 pt

© People with Disability Australia Ltd. 2025

The moral rights of the authors have been asserted.

National Library of Australia Cataloguing-in-Publication data:

Creator(s): People with Disability Australia

Title: Budget measures for long-term accessible, inclusive and equitable reforms for people with disability: Pre-Budget Submission to Australian Treasury for the 2025-26 Federal Budget.

All rights reserved. Except as permitted with the *Australian Copyright Act 1968* (for example, a fair dealing for the purposes of study, research, criticism or review), no part of this book may be reproduced, stored in a retrieval system, communication or transmitted in any form or by any means without prior written permission. All inquiries should be made to the publisher at the address above.

Suggested citation:

People with Disability Australia (2025) *Budget measures for long-term accessible, inclusive and accessible reforms for people with disability: Submission to the Australian Treasury for the Federal Budget 2025-26*, Sydney, Australia.

ISBN 978-1-7635915-2-3



Table of Contents

Copyright information	2
About PWDA	4
Introduction	5
Recommendations	6
Budget measures to enable equity, inclusion and access for people with disability	13
Economic Justice	13
Social and affordable housing	13
Jobseeker, Disability Support Pension and Commonwealth Rent Assistance	15
Inclusion and access	17
Ecosystem of supports	17
Governance	18
Advocacy	18
Eliminating restrictive practices	19
Supported decision-making	20
Human rights and disability discrimination	21
Genuine codesign	22
Conclusion	22
Appendix A: Analysis of cost-benefit of priorities	23

About PWDA

[People with Disability Australia](#) (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

We have a vision of a socially just, accessible and inclusive community in which the contribution, potential and diversity of people with disability are not only recognised and respected but also celebrated.

PWDA was established in 1981, during the International Year of Disabled Persons.

We are a peak, non-profit, non-government organisation that represents the interests of people with all kinds of disability.

We also represent people with disability at the United Nations, particularly in relation to the United Nations Convention on the Rights of Persons with Disabilities (CRPD).

Our work is grounded in a human rights framework that recognises the CRPD and related mechanisms as fundamental tools for advancing the rights of people with disability.

PWDA is a member of [Disabled People's Organisations Australia](#) (DPO Australia), along with the First People's Disability Network, National Ethnic Disability Alliance, and Women with Disabilities Australia.

DPOs collectively form a disability rights movement that places people with disability at the centre of decision-making in all aspects of our lives.

The work of PWDA embraces the 'Nothing About Us, Without Us' motto of the international disability community and Disabled Peoples' International, the international organisation representing national organisations of people with disability in over 130 countries.



Introduction

The year of 2024 set the stage for government response to the landmark reform processes that concluded in 2023, namely, the [Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#) (Disability Royal Commission) and the [Independent Review of the National Disability Insurance Scheme](#) (NDIS Review).

In July 2024, the Australian Government responded simultaneously with all state and territory governments to the Disability Royal Commission. PWDA and our fellow Disability Representative Organisations (DROs) were disappointed by the lacklustre response.¹

The disappointment was exacerbated later in 2024 by the legislative amendments to the *National Disability Insurance Scheme Act 2013* relating to the NDIS Review.²

Therefore, in this budget submission we propose commitments to reestablish trust with the 5.5 million Australians with disability³, with budgetary measures that invest in:

- Ensuring **economic justice**, in the context of cost-of-living and housing crises disproportionately impacting people with disability
- Enabling **inclusion and access** to supports and services, in the context of reforms to the NDIS and supports that sit outside the NDIS
- **Protecting human rights** and **addressing disability discrimination**, in the context of the Human Rights Framework and proposed Human Rights Act and *Disability Discrimination Act 1992* reforms
- Investing in **genuine codesign**, rather than tokenistic consultation

¹ People with Disability Australia (2024, 31 July). *Media Statement from Australia's Disability Representative Organisations regarding Government Response to Disability Royal Commission today Wednesday 31 July* [Press release]. <https://pwd.org.au/government-response-to-violence-against-people-with-disability-deeply-disappointing/>

² People with Disability Australia (2024, 22 August). *PWDA "Devastated" at the Passage of the NDIS Amendment Bill* [Press release]. <https://pwd.org.au/pwda-devastated-at-the-passage-of-the-ndis-amendment-bill/>

³ Australian Bureau of Statistics (2024). *Disability, Ageing and Carers, Australia: Summary of Findings*. <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>

Recommendations

Economic Justice

Recommendation 1: The Australian Government provides adequate funding for the oversight and review of targeted action plans under Australia's Disability Strategy 2022-32, including the Inclusive Homes and Communities Targeted Action Plan.

Recommendation 2: The Australian Government takes leadership through the Disability Reform Ministerial Council (DRMC) to ensure national consistency in implementation of the National Construction Code. All state and territory governments must commit by 1 July 2025 to full implementation of the Livable Housing Design Standard, noting the lack of full implementation in either NSW or Western Australia.

Western Australia cited in their formal response to the Disability Royal Commission that they have not yet adopted this standard, although both Western Australia and NSW cited in their respective responses that they apply standards, where possible, to new builds.

The current NSW and incoming Western Australian governments must commit to adopting the standard for both legacy and new housing stock.

Recommendation 3: The Australian Government commits to increasing the maximum threshold of the Commonwealth Rent Assistance (CRA) by 60%⁴, especially for CRA recipients with disability with respect to the lack of availability of accessible rental properties and the incurred additional expenses in renting in proximity to local community for access to health, disability and other services, and public transport.

⁴ The Australian Council of Social Services (ACOSS) has advocated for a 60% increase based on evidence of material deprivation experienced by people in Australia receiving payments including JobSeeker, the Commonwealth Rent Assistance (CRA) and other payments. Australian Council of Social Services (2024, 27 November). *People receiving JobSeeker five times more likely to experience multiple deprivation: New report* [Press release]. https://www.acoss.org.au/media_release/people-receiving-jobseeker-five-times-more-likely-to-experience-multiple-deprivation-new-report/

Budget impact: \$2.37 billion⁵

Recommendation 4: The Australian Government commits to increasing Jobseeker by \$82/week by 1 July 2025, to support people with disability experiencing disproportionate economic disadvantage due to the cost-of-living and housing crises.

Budget impact: \$3.15 billion.⁶

Recommendation 5: The Australian Government provides lifelong access to the Disability Support Pension by permitting people to achieve the 20 points requirements across multiple tables for access eligibility by 1 July 2025.⁷

Budget impact: None.

Recommendation 6: The Australian Government adopts Recommendation 9 of the Economic Inclusion Advisory Committee 2024 Report⁸ to: 'relax work limit rules on payments to encourage and enable workforce participation, particularly for people who have fluctuating or episodic conditions or caring responsibilities, including by: a. Removing the 30 hour per week limit for DSP recipients.'

⁵ Based on [Australian Institute of Health and Welfare \(AIHW\) data](#) released in July 2024, there were 1.3 million people receiving Commonwealth Rent Assistance (CRA). Out of these, 1 in 5 (20%) were in receipt of the Disability Support Pension. [Additional data from the AIHW](#) states that 270,000 units of DSP and CRA were being issued in June 2022. Using the proposed amount of a 60% increase to the maximum threshold for the CRA proposed by ACOSS, the approximate budget impact is calculated by multiplication of the number of recipients receiving both payments, the 60% increase added to the [current single weekly payment](#) (\$105.6 x 1.6 = \$168.96) and 52 weeks a year.

⁶ As per [Australian Institute of Health and Welfare \(AIHW\) data](#) released in March 2023, there were 740,800 people over age 16 receiving Jobseeker. Using the [proposed amount by ACOSS of \\$82/week](#), the approximate budget impact is calculated by multiplication of the number of recipients, the proposed increase, and 52 weeks a year.

⁷ PWDA recommended this in our previous Federal budget submission. Further, we note the [Government Response to the Inquiry into Purpose, Intent and Adequacy of the Disability Support Pension](#) tabled in November 2024, that the Australian Government did not accept Recommendation 2 made by the Committee to this effect.

⁸ Australian Government Department of Social Services (2024) *Economic Inclusion Advisory Committee 2024 Report*. <https://www.dss.gov.au/committees/resource/economic-inclusion-advisory-committee-2024-report>

Inclusion and access

Recommendation 7: Australian, state and territory governments commit to:

- Prioritising cohorts who are already experiencing the gap in services and support outside the NDIS, including those in thin market areas including regional, remote and rural regions, and to meet diverse needs for people with intersecting identities. There needs to be clear remedial actions for people with disability, including children, who have already lost supports through the NDIS due to eligibility re-assessments⁹
- Not implementing Foundational Supports prior to implementing nationally consistent Foundational Supports Standards which are genuinely codesigned and coproduced with people with disability and their representative organisations. A Council should be established to oversee development and implementation of the Standards
- Pilot testing of Foundational Supports that involves codesign with people with disability and their representative organisations to refine service of Foundational Supports prior to full national implementation
- Equitable rollout of Foundational Supports after pilot testing that does not result in location lottery for service delivery, creating a continuation of the thin market of service delivery being experienced in regional, rural and remote areas. Participants must not be disadvantaged due to their locality
- Not cutting the funding of the NDIS to fund Foundational Supports. It is essential that the integrity of the NDIS, centring participant autonomy and agency are prioritised when making funding decisions about how the NDIS fits within a broader disability supports ecosystem

⁹ Morton, R. (11 Jan 2025). Exclusive: Children targeted in NDIS crackdown. *The Saturday Paper*. <https://www.thesaturdaypaper.com.au/news/health/2025/01/11/exclusive-children-targeted-ndis-crackdown>

- Developing clearer specification of how Foundational Supports will be funded at national, state and territory government levels, with clear articulation of where funding priorities lay within each jurisdiction both now and into the future.¹⁰

Budget impact for codesign and coproduction of Foundational Supports Standards: \$1 million; Foundational Supports pilot testing: Unknown.

Recommendation 8: The Australian Government adopts Recommendation 5.6 of the Disability Royal Commission for new governance arrangements for disability including a ministerial portfolio for Disability Inclusion.

Budget impact: \$108 million over 4 years.^{11,12}

Recommendation 9: The Australian Government enables long-term, sustainable support for advocacy that addresses unmet demand by increasing resources for individual advocacy for people with disability by:

- Providing ongoing investment for Disability Representative Organisations (DRO) funded by the Department of Social Services
- Provide ongoing investment for organisations funded under the National Disability Advocacy Program (NDAP).

¹⁰ Noting the [Independent Review into the National Disability Insurance Scheme's analysis](#) that the overarching framework for roles and responsibilities between the NDIS and other systems, the Applied Principles and Tables of Support (APTOS), 'has failed' and that they instead recommended a replacement with a multilateral schedule (action 2.6) under a new disability Intergovernmental Agreement (action 2.20) (pp.35-6).

¹¹ This would bring the current Social Services and NDIS portfolios under a single, federal ministerial portfolio; operational arrangements of associated departments including reporting lines may alter but otherwise would materially remain unchanged.

¹² Noting the investment made in New Zealand when Whaikaha (the Ministry of Disabled People) was established – the NZ government invested '[\\$107.859 million over four years to establish the new Ministry for Disabled People to strengthen the cross-government system and help transform services.](#)' This included recruitment of CEOs and Heads of Departments. Te Kāwanatanga o Aotearoa New Zealand Government (2022, 19 May). *Paving the way for better outcomes for disabled people* [Media release]. <https://www.beehive.govt.nz/release/paving-way-better-outcomes-disabled-people>

Budget impact: \$500k per annum for each DRO; \$43 million per annum for the NDAP.¹³

Recommendation 10: Australian, state and territory governments commit to elimination of restrictive practices through:

- Commissioning a longitudinal study by the National Disability Research Partnership (NDRP) of the impact of what is referred to as ‘positive behaviour support’ and other strategies to eliminate restrictive practices, with supports codesigned with people with disability and other stakeholders. This was recommended in the Australian Government’s Response to the Disability Royal Commission.
- The Australian Government takes national leadership in the development of a Roadmap and Joint Action Plan to eliminate restrictive practices, ensuring national consistency in legislative frameworks and subsequent actions taken by each state and territory. The Disability Reform Ministerial Council (DRMC) will be responsible for oversight of plan progress and implementation. The Roadmap and Joint Action Plan should be developed in genuine codesign with people with disability and their representative organisations, with finalisation by 1 July 2026. This extends the immediate ban on some restrictive practices outlined in Disability Royal Commission Recommendation 6.36 to enable the elimination of all restrictive practices.

Budget impact: Investment of \$1.2 million has already been made by the Australian Government to reduce and eliminate restrictive practices.¹⁴

Recommendation 11: The Australian Government provides additional investment for supports assisting people with communication support needs as a priority, enabling rights for people who face barriers to accessing supported decision-making and who are more likely to lack other informal safeguards in their lives.

Budget impact: \$500k

¹³ The budget cost is derived from Disability Advocacy Network Australia (DANA) in both their [Pre-Budget Submission 2023-24](#) and the [Speak Up! Advocacy campaign](#).

¹⁴ See the [Australian Government Response to the Disability Royal Commission \(November 2024\)](#), p.6

Recommendation 12: The Australian Government develops a Supported Decision Making Framework guided by the [Disability Royal Commission Research Report: Diversity, dignity, equity and best practice: A framework for Supported Decision Making](#), implementing all recommendations made within the report, with the caveat that people with higher support needs and their representative organisations are involved in codesign and coproduction at every stage of policy development.

It is critical that stronger connections are embedded within the Framework supports for people with high support needs, including communication support needs.

The Framework must be delivered by 1 July 2026.

Budget impact: \$1.6m

Human Rights and Disability Discrimination

Recommendation 12: The Australian Government establishes a national Human Rights Act, as per Recommendations 1 and 2 of the [Inquiry into Australia's Human Rights Framework](#). The development of the national Human Rights Act should consider Recommendations 4.1-4.21 made in the Disability Royal Commission response relating to a Disability Rights Act.

The national Human Rights Act must expressly incorporate immediate rights in the *United Nations Convention on the Rights of Persons with Disability* (CRPD), by individually listing each relevant CRPD right or by reference to incorporation of the CRPD into the legislation.

Budget impact: Unknown.

Recommendation 13: The Australian Government reforms the *Disability Discrimination Act 1992* in codesign with people with disability and their representative organisations. This includes updates to the associated Standards conducted separately, not concurrently, thereby rushing the process. These Standards are correlated and intersecting – there are co-impacts from the application of all Standards.

Disability Discrimination Act reform and modernisation should include:

- *Disability Standards for Education 2005*, noting the 2020 Review, with additional updates to support proposed desegregation in the Disability Royal Commission, namely Recommendations 7.13 and 7.14
- *Disability Standards for Accessible Public Transport (DSAPT) 2002* noting the 2022 Review and updates from the Aviation White Paper including the proposed Aviation Disability Standard¹⁵
- *Disability (Access to Premises – Building) Standard 2010*, which will be next reviewed in 2026
- Updates to reflect evidence-based best practice in emergency management to support people with disability.

Budget impact: \$6.9 million already designated for DDA reform and modernisation.¹⁶

Genuine Codesign

Recommendation 14: The Australian Government must commit to genuine codesign with people with disability and their representative organisations with respect to all budget measures that will lead to public consultations and reforms across all portfolios.

Genuine codesign means inclusion of people with disability and their representative organisations, translating the feedback that they provide into measurable, tangible actions at every stage of reform, from initial scoping to design, implementation and post-implementation monitoring and evaluation.

The Australian Government must demonstrate commitment by:

- Implementation of a Disability Reform Implementation Council with representatives comprising of people with disability and members from their representative organisations by 1 July 2025

¹⁵ See media release from Justice and Equity Centre (JEC) & PWDA: [Aviation Transport Standards welcomed, but need genuine co-design to work for people with disability](#)

¹⁶ See the [Australian Government Response to the Disability Royal Commission \(November 2024\)](#), p.6

- Establishing reasonable timeframes for reform implementation with respect to demands imposed from concurrent consultations.

Budget impact: Unknown.

Budget measures to enable equity, inclusion and access for people with disability

This submission focusses on four key priorities for focus in the 2025-26 Federal Budget to deliver societal equity, inclusion and access for people with disability. For information regarding economic costs and savings, additional information is in *Appendix A*.

Economic Justice

Social and affordable housing

People with disability have a right to access safe, affordable, secure and accessible housing as per the *United Nations Convention on the Rights of Persons with Disabilities* (CRPD) under Articles 9, 19 and 27.¹⁷ Housing is a cascading right – without it, all other human rights are impinged.

In the context of a cost-of-living and housing crisis, people with disability are being disproportionately impacted:

‘Worsening affordability is particularly problematic for vulnerable groups, including low-income households, single parents, young people, single pensioners, those fleeing domestic or family violence, people with disability, and First Nations Australians. Declining rental affordability

¹⁷ United Nations Convention on the Rights of Persons with Disabilities, December 13, 2006, <https://www.ohchr.org/en/hrbodies/crpd/pages/conventionrightspersonswithdisabilities.aspx>

correlates with an increase in homelessness’ (p.3, Australian Government – National Housing and Supply and Affordability Council).¹⁸

Budget recommendations made relating to housing therefore seek to prioritise people with disability in the federal responses to homelessness, social and affordable housing and accessibility. The recommendations correspond with Recommendation 9.11 of the NDIS Review Final Report that ‘all Australian governments should agree and publish a targeted action plan for housing under Australia’s Disability Strategy’ with an additional measure for ‘a commitment for all remaining jurisdictions to sign up to the Livable Housing Design Standards in the National Construction Code’ (NDIS Review panel, p.155).¹⁹

This recommendation is reinforced in the Disability Royal Commission Final Report, Recommendation 7.35 Increase the availability and supply of accessible and adaptive housing for people with disability through the National Construction Code.²⁰

PWDA welcomes the announcement in the Australian Government’s National Interim Update to the Disability Royal Commission released in December 2024, that three additional Targeted Action Plans (TAPs) will be developed under Australia’s Disability Strategy (ADS), including one for Inclusive Homes and Communities corresponding to Recommendation 7.34 Include homelessness in Australia’s Disability Strategy (Australian Government, Department of Social Services p.4).²¹

The Australian Government must budget for the oversight and review of the Inclusive Homes and Communities TAP to ensure it has maximum impact. This is especially

¹⁸ Australian Government, National Housing Supply and Affordability Council (2024). *State of the Housing System 2024*. <https://nhsac.gov.au/reports-and-submissions/state-housing-system-2024>

¹⁹ Commonwealth of Australia (2023). *Working together to deliver the NDIS: Independent Review of the National Disability Insurance Scheme Final Report*. <https://www.ndisreview.gov.au/resources/reports/working-together-deliver-ndis>

²⁰ Commonwealth of Australia (2023). *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disabilities: Executive summary – Our vision for an inclusive Australia and recommendations*. <https://disability.royalcommission.gov.au/publications/final-report-executive-summary-our-vision-inclusive-australia-and-recommendations>

²¹ Australian Government, Department of Social Services. *National Interim Update 2024: Government Response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability*. <https://www.dss.gov.au/responding-disability-royal-commission/australian-government-response-disability-royal-commission>

important given that the Australian Government has stated that it ‘will not prioritise different cohorts [in the National Housing and Homelessness Plan] in recognition of the large degree of intersectionality and diversity among individuals and households, but will acknowledge that some groups, including people with disability, face additional barriers’ (p.156).²²

See **Recommendations 1 and 2** (p.6).

Jobseeker, Disability Support Pension and Commonwealth Rent Assistance

The Final Report for the Cost of Living Inquiry, tabled in November 2024, highlighted the disproportionate impact of the current cost-of-living and housing crises on Australians with disability.

‘Australians are struggling to meet basic costs for food, shelter and heating/cooling, and small businesses are struggling to stay alive. As the committee learned, the cost of living crisis is disproportionately impacting the most vulnerable, including children and young people, people with disability and their families’ (Select Committee on the Cost of Living, p.81).²³

The Australian Council of Social Services (ACOSS) produced research in 2022 based on surveying people who are receiving JobSeeker and other payments revealing that the payments are inadequate in meeting the current cost of living and rental or housing markets. In their response they highlighted the increasing number of people with disability or chronic illness receiving JobSeeker instead of the Disability Support Pension (DSP), in response to tightening eligibility criteria for the DSP (ACOSS, p.13).

²² Commonwealth of Australia (2023). *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disabilities: Executive summary – Our vision for an inclusive Australian and recommendations*. <https://disability.royalcommission.gov.au/publications/final-report-executive-summary-our-vision-inclusive-australia-and-recommendations>

²³ Commonwealth of Australia (2024). *Select Committee on the Cost of Living: Final report*. https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Cost_of_Living/costofliving/Report

ACOSS continues:

*‘Not only does having an illness or disability limit people’s ability to find suitable paid work, but it also incurs higher living expenses due to medication, treatment and other extra costs. Furthermore, because the inadequacy of JobSeeker forces people to cut back on food, electricity, healthcare and social interaction, people’s health and wellbeing declines’
(p.13).*

Despite this evidence, the Senate’s Select Committee on the Cost of Living Inquiry’s final recommendations fell short of any measures that will tangibly assist people with disability to mitigate the impacts of the current economic conditions.²⁴

People with disability are penalised with pension reduction if they wish to increase work beyond 29 hours a week²⁵, which is a deterrent to provision of genuine social inclusion through economic participation, whilst impeding economic security for people with disability.

Further, it fails to alleviate the cost pressures associated with disability; people with disability need to increase their disposable income by 50% to achieve the same standard of living as people without disability (see Appendix A).

Therefore, PWDA recommends measures that address inadequate Commonwealth Rent Assistance (CRA), JobSeeker, and Disability Support Pension access criteria and weekly payment quantities.

See **Recommendations 3, 4, 5 and 6** (pp.6-7).

²⁴ Also see People with Disability Australia (2024, 18 November). *Paying the price’ Final Report a missed opportunity to alleviate cost of living crisis for people with disability* [Press release]. <https://pwd.org.au/paying-the-price-final-report-a-missed-opportunity-to-alleviate-cost-of-living-crisis-for-people-with-disability/>

²⁵ Services Australia (2025). *Working while you’re getting Disability Support Pension*. <https://www.servicesaustralia.gov.au/working-while-youre-getting-disability-support-pension?context=22276>

Inclusion and access

Ecosystem of supports

In response to the NDIS Review, reforms are imminent relating to the ecosystem of supports that exists for people with disability in Australia and they need investment to ensure they are rolled out in a way that meets the needs of Australians with disability. These reforms relate to Recommendations 1 and 2 from the NDIS Review regarding the development of Foundational Supports, improving the connection between mainstream services and the NDIS, and ensuring ‘fairness, balance and sustainability to the [entire] ecosystem.’²⁶

PWDA is concerned about the future ecosystem of supports operating inside and outside the NDIS for people with disability. PWDA’s Submission on Foundational Supports reflects our position that Foundational Supports need to prioritise upholding rights as per the CRPD, and be designed and implemented using genuine codesign with people with disability and our representative organisations.

Many people in the disability community have engaged in NDIS reform co-design and consultation processes in good faith on the understanding that NDIS changes will only occur when adequate foundational supports are in place. We call on the Government to uphold its end of the ‘deal’ and ensure the budget reflects the need for investment that enables equitable access in all locations to Foundational Supports, especially addressing barriers to services in thin markets in regional, rural and remote regions. Further, we call for investment for an inquiry to develop a nationally consistent Standard for Foundational Supports with an oversight Council, and pilot testing prior to national implementation. Finally, we want to ensure that NDIS funding is not withdrawn to implement Foundational Supports, with remedial actions taken for those who have already experienced a loss of funding.

²⁶ Commonwealth of Australia (2023). *NDIS Review: Recommendations and actions*. <https://www.ndisreview.gov.au/resources/reports/working-together-deliver-ndis/preface/recommendations-and-actions>

See **Recommendations 7** (pp.7-8).

Governance

Although the Australian Government's formal response merely noted the recommendation, PWDA reiterates our call for a Ministerial portfolio for disability inclusion to strengthen capacity to delivery disability inclusion on a broad scale across Australia (as per Disability Royal Commission Recommendation 5.6). This would enable disability-related policy being under the responsibility of a single department, cutting through existing silos between departments. This call was supported by over 65+ disability organisations.²⁷

The budgetary measure proposed is based on New Zealand's 4-year investment to create a Ministry of Disabled People.

See **Recommendation 8** (p.9)

Advocacy

Due to rapid, concurrent reforms across multiple systems impacting people with disability across Australia, it is crucial that advocacy organisations are appropriately funded to support people with disability, in both individual and systemic advocacy.

Understanding demand is a key factor in understanding what budgetary measures are needed for sustainability and resourcing for disability advocacy. Evidence supplied by Taylor Fry and the Centre for International Economics (CIE) to the Disability Royal Commission provides ample evidence of unmet demand.²⁸ Disability Advocacy Network Australia (DANA) responded to this data modelling, reiterating that while additional funding would be welcomed to address unmet need as per Recommendation 6.21 of the Disability Royal Commission, it is insufficient to address the magnitude of unmet demand, noting

²⁷ People with Disability Australia (December, 4 November). *An open letter to the Prime Minister, the National Cabinet and the Opposition Leader: Immediate actions required for Australians with disability in response to the Disability Royal Commission* <https://pwd.org.au/an-open-letter-to-the-prime-minister-the-national-cabinet-and-the-opposition-leader/>

²⁸ Vincent, J., McCarthy, D., Miller, H., Armstrong, K., Lacey, S., Lian, G., Qi, D., Richards, N., Berry, T. (2022). *Research Report - The economic cost of violence, abuse, neglect and exploitation of people with disability*. Taylor Fry. <https://disability.royalcommission.gov.au/publications/economic-cost-violence-abuse-neglect-and-exploitation-people-disability>

Recommendation 6.22 relating to improved data collection of unmet demand.²⁹ In fact, DANA states that ‘current data suggests that there is approximately twice as much demand for advocacy in comparison to supply’ (p.9).³⁰

See **Recommendation 9** (pp.9-10).

Eliminating restrictive practices

PWDA has systemically advocated for the complete elimination of restrictive practices for years. We reiterate a call for complete elimination of restrictive practices.

The Australian Government in their response to the Disability Royal Commission indicated support in principle for Recommendations 6.38, 6.39 and 6.40 relating to actions taken in relation to restrictive practices, citing support for the National Disability Research Partnership (NDRP) commissioning longitudinal research of the impact of what is referred to as ‘positive behaviour support’ and other strategies to reduce and eliminate restrictive practices (p.105). PWDA supports this proposal.

The National Interim Update released in December 2024 by the Australia Government did not shed any additional light on measures taken in relation to eliminating restrictive practices except to note that the NDIS Quality and Safeguards Commission (NDIS Commission) is working with La Trobe University to develop e-learning modules for support worker skills training, including focussing on reduction and elimination of restrictive practices (p.5).

PWDA urges the response to the federal budget to go further and implement recommendations whereby federal leadership drives the development of a roadmap and joint action plan with state and territory governments to eliminate restrictive practices.

See **Recommendation 10** (p.10).

²⁹ Disability Advocacy Network Australia. *Royal Commission: Analysing the recommendations on independent disability advocacy*. <https://www.dana.org.au/royal-commission-analysing-the-recommendations-about-independent-disability-advocacy/>

³⁰ Disability Advocacy Network Australia (2023). *Pre budget submission from the disability advocacy sector*. <https://www.dana.org.au/current-work/our-submissions/>

Supported decision-making

PWDA welcomes initiatives aimed at enabling supported decision-making across systems, however we call for federal leadership to develop a nationally consistent Supported Decision-Making Framework guided by principles (Disability Royal Commission Recommendation 10.30) that encourages supported decision-making across all government systems, including public-facing services and supports. This would be in line with the Disability Royal Commission's Research Report that examined a potential Supported Decision-Making Framework³¹ with the caveat that people with high support needs and communication support needs are prioritised and included at every stage of policy development.

PWDA additionally supports the call previously made by Inclusion Australia that budgetary measures addressing supported decision-making would ease guardianship challenges.³²

Inclusion Australia states that Recommendations 10.6 and 10.7 require universal decision-making supports for *all* people with disability using NDIS services, not merely people who have been deemed to require what has been referred to as 'positive behaviour support'. This reiterates our call for a Supported Decision Making Framework that is implemented across all government systems.

See **Recommendation 11** (p.10).

³¹ Bigby, C., Carney, T., Then, S-N., Wiesel, I., Sinclair, C., Douglas, J., & Duffy, J., (2023). *Diversity, dignity, equity and best practice: a framework for supported decision-making*. Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability <https://disability.royalcommission.gov.au/policy-and-research/research-program>

³² Inclusion Australia released this media release prior to the 2022 Disability Royal Commission sessions relating to guardianship. Inclusion Australia (2022, 18 November). *Invest in support for decision making to ease guardianship challenges* [Press release]. <https://www.inclusionaustralia.org.au/invest-in-support-for-decision-making-to-ease-guardianship-challenges/>

Human rights and disability discrimination

PWDA supports the Human Rights Framework developed by the Australian Human Rights Commission (AHRC), which includes the development of a national Human Rights Act.³³ The national Human Rights Act must expressly incorporate immediate rights in the *United Nations Convention on the Rights of Persons with Disability* (CRPD), by individually listing each relevant CRPD right or by reference to incorporation of the CRPD into the legislation.

In developing a national Human Rights Act, the Government should consider the Disability Royal Commission's proposed Disability Rights Act under Recommendations 4.1-4.21.

See **Recommendation 12** (p.10).

PWDA further supports amendments modernising the *Disability Discrimination Act 1992* (DDA) as per Disability Royal Commission Recommendations 4.23-4.34. We welcome the announcement of investment in reforms aimed at the modernisation of the DDA, with the caveat that genuine codesign occurs with people with disability and their representative organisations.

Further, we support the review of associated standards for education, transport, premises and encourage the inclusion of emergency management, acknowledging the co-impact for people with disability of all associated standards. The review and update for transport standards should include measures recommended for people with disability emerging from the Aviation White Paper, including an Aviation Industry Ombuds Scheme and aviation-specific disability standards.³⁴

See **Recommendation 13** (p.11).

³³ People with Disability Australia (2023). *A Human Rights Act for all: Submission to the Parliamentary Joint Committee on Human Rights' Inquiry into Australia's Human Rights Framework*. <https://pwd.org.au/submission-a-human-rights-act-for-all/>

³⁴ Commonwealth of Australia (2024). *Aviation White Paper: Towards 2050*. <https://www.infrastructure.gov.au/department/media/publications/aviation-white-paper-towards-2050>

Genuine codesign

We welcome the National Disability Insurance Agency's efforts to co-design reforms with people with disability and our representative organisations. We encourage the Government to extend its co-design commitment to other areas of disability reform, particularly those outlined in this submission. People with disability and their representative organisations must be centred in disability reform responses and subsequent actions, involved from design to implementation and post-implementation evaluation and monitoring processes. This will ultimately result in more informed and therefore efficient solutions, that can reduce costs in the long term.

See **Recommendation 14** (p.11-12).

Conclusion

The Australian Government has an ideal moment in disability advocacy history to take the leadership reins and drive significant, long-lasting reform to ensure Australians with disability can live in communities that are accessible, inclusive and equitable, with protected human rights.

PWDA strongly urges the Australian Government to implement our recommendations with federal budget measures that enable social justice, inclusion and access, human rights and elimination of disability discrimination, with genuine codesign cutting across all domains.

Appendix A: Analysis of cost-benefit of priorities

In responding to the Australian Treasury with our Pre-budget Submission, PWDA has developed the following analysis of economic cost versus saving when response is taken in relation to the priority areas identified in our submission.

Housing and homelessness

Population data relating to homelessness from Homelessness Australia published in October 2024 indicates that 300,000 people with ‘persistent, severe and complex psychosocial disabilities’ are homeless, with 31,000 at risk of homeless and another 2,000 located in institutional settings.³⁵

Meanwhile, data from the Australian Institute of Health and Welfare released in April 2024 indicates that only 25,900 Specialist Homelessness Service clients (9.5% of all clients or 1 in 10) had a disability. This means there is vast unmet need in homelessness services for people with disability.³⁶ This can be addressed through more social and affordable housing.

The benefit in investing in eliminating homelessness through addressing the national shortage of social and affordable housing is the return-on-investment and benefit to all Australians, with the Give Me Shelter report revealing a cost-benefit analysis that ‘every \$1 the Australian community invests in social and affordable housing will deliver \$2 in benefits’ (p.3).³⁷

³⁵ Homelessness Australia (2024, 10 October). *Urgent expansion of services needed for people with psychosocial disabilities at risk of homelessness* [Press release]. <https://homelessnessaustralia.org.au/urgent-expansion-of-services-needed-for-people-with-psychosocial-disabilities-at-risk-of-homelessness/>

³⁶ Australian Government, Australian Institute of Health and Welfare (2024). *People with disability in Australia, Homelessness services*. <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/housing/homelessness-services>

³⁷ SGS Economics and Planning for Housing All Australian (2022). *Give Me Shelter: The long-term costs of underproviding public, social and affordable housing*. <https://housingallaustralians.org.au/what-we-do/give-me-shelter/>

Economic security, employment and government payments

In 2020, researchers analysed data to determine the economic cost of disability in Australia finding that ‘people with a disability need to increase their adult-equivalent disposable income by 50% (in the short-run) to achieve the same standard of living as those without a disability.’ They found that living standard correlated with income level. The researchers concluded that ‘increasing the income (e.g. through government payments) or providing subsidised services for people with a disability may increase their financial satisfaction, leading to an improved living standard.’³⁸

People with disability between the ages of 18-65 are less likely to be in the labour force than people without disability (53% comparative to 84%). Therefore, economic security from employment, despite the economic benefits to the economy³⁹ is not guaranteed for people with disability.

This is often driven by the level of educational attainment achieved by people with disability, which is lower comparative to people without disability for completion of year 12 (34% to 66%) and attainment of a bachelor’s degree or higher (17% to 35%).⁴⁰

Current data indicates that economic insecurity experienced by people with disability in Australia impacts their health and wellbeing with financial stress impacting measures like being able to provide meals or heating their home if needed.⁴¹

Financial stress also impacts rent and the ability to make mortgage repayments, leading to housing insecurity and risk of homelessness for some people with disability.

³⁸ Vu, B., Khanam, R., Rahman, M. et al (2020). The costs of disability in Australia: a hybrid panel-data examination. *Health Econ Rev* 10, 6.

<https://healtheconomicsreview.biomedcentral.com/articles/10.1186/s13561-020-00264-1>

³⁹ Australian Human Rights Commission (2021). *Economic and Business Benefits of Employing People with Disability*. <https://humanrights.gov.au/our-work/disability-rights/economic-business-benefits-employing-people-with-disability>

⁴⁰ Australian Government, Australian Institute of Health and Welfare (2024). *People with disability in Australia, Educational attainment*. <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/education-and-skills/educational-attainment>

⁴¹ Australian Government, Australian Institute of Health and Welfare (2024). *People with disability in Australia, finances*. <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/income-and-finance/finances>

Lifting government payments including Commonwealth Rent Assistance (CRA), JobSeeker and the Disability Support Pension can alleviate financial security, reduce housing insecurity and homelessness or risk of homelessness, and overall, lift the standard of living for Australians with disability.

The flow-on impact is the economic benefit generated by reducing impacts on the national health and mental health systems as people struggle with financial and emotional distress caused by the standard of living imposed upon them through financial and housing insecurity.

NDIS and the disability support ecosystem

Although reforms are taking place to change the system of supports that sit outside the NDIS, it is important to acknowledge the return-on-investment created by the NDIS and to caution against any Scheme cuts to aid the implementation of Foundational Supports.

In their March 2023 report, Per Capita cited that every dollar invested in the NDIS delivers an economic return of \$2.25, calling for more investment in the supports previously identified as Tier 2 supports.⁴²

Human rights and the cost of disability discrimination in the form of violence, abuse, neglect and exploitation

The Research Report commissioned by the Disability Royal Commission provided actuarial analysis of the annual and lifetime economic costs of violence, abuse, neglect and exploitation of people with disability in Australia. They found that:

- The cost of violence, abuse, neglect and exploitation that could be reliably measured was \$46 billion in 2021-22

⁴² Per Capita (2023). *Not a One-Stop Shop: The NDIS in Australia's social infrastructure*. https://percapita.org.au/our_work/not-a-one-stop-shop-the-ndis-in-australias-social-infrastructure/

- Indicative costs from other forms of over-representation in poor outcome areas, and under-representation in financial and social opportunities cost \$8.8 billion in 2021-22.⁴³

Therefore, the cost of not investing in human rights protections as per the CRPD and modernisation of the *Disability Discrimination Act 1992* (DDA) through reforms is too great, both for the personal freedom of people with disability and the ongoing national economic cost.

⁴³ Vincent, J., McCarthy, D., Miller, H., Armstrong, K., Lacey, S., Lian, G., Qi, D., Richards, N., Berry, T. (2022). *Research report: The economic cost of violence, abuse, neglect and exploitation of people with disability*. Taylor Fry. <https://disability.royalcommission.gov.au/publications/economic-cost-violence-abuse-neglect-and-exploitation-people-disability>