NEDA

NATIONAL ETHNIC DISABILITY ALLIANCE

Submission

Department of Social Services

National Ethnic Disability Alliance (NEDA): Submission in Response to Consultation on Proposed Foundational Supports

December 2024

Publishing Information:

© National Ethnic Disability Alliance, December 2024

© This work is copyright. Apart from any use as permitted under the Copyright Act 1968, no part may be reproduced without written permission from the National Ethnic Disability Alliance (NEDA). All possible care has been taken in the preparation of the information contained in this document. NEDA disclaims any liability for the accuracy and sufficiency of the information and under no circumstances shall be liable in negligence or otherwise in or arising out of the preparation or supply of any of the information aforesaid.

Contact for this Submission:
Samara Rodway
CEO, National Ethnic Disability Alliance
Email: samara@neda.org.au

Acknowledgement

The National Ethnic Disability Alliance (NEDA) acknowledges the traditional owners of the lands on which we live, work and play, and acknowledge their continuing connection to land, waters and community. We pay our respects to Aboriginal and Torres Strait Islander cultures and to Elders past and present.

About Us

NEDA is a national Disabled People's Organisation (DPO) governed by and constituted of Culturally and Linguistically Diverse (CALD) people with disability.[1] The key purpose of NEDA is to promote, protect and advance the human rights and freedoms of all people with disability from CALD backgrounds, including, but not limited to, those on temporary visas, and from refugee and asylum seeker backgrounds.

NEDA's membership is made up of CALD people with disability. Our state and territory member organisations are either CALD DPOs, CALD disability advocacy organisations or community-led disability advocacy organisations with a demonstrated history of working in partnership with CALD people with disability and their communities.[2]

NEDA is a founding member of Disabled People's Organisations Australia (DPO Australia), an alliance of four national DPOs. NEDA receives funding from the Department of Social Services (DSS).

Introduction

The National Ethnic Disability Alliance (NEDA) thanks the Commonwealth Department of Social Services (DSS) and The Social Deck for the opportunity to consult on the proposal and development of Foundational Supports.

NEDA's consultation process to inform this submission has included three focus groups conducted in partnership with The Social Deck and DSS and an online survey. These efforts aimed to gather insights from people with disabilities from CALD backgrounds, their families and carers, to ensure the design of Foundational Supports reflects the unique needs and experiences of these communities.

NEDA recognises the potential of Foundational Supports to provide long-term funding for critical services such as information dissemination, capacity building, peer support and decision-making assistance. We view this as an opportunity to create a system that improves the lives of people with disabilities from CALD backgrounds, addressing intersectional barriers and advancing equity. However, we express concerns about several issues that must

[1] National Ethnic Disability Alliance (NEDA), *Governance/Board*, NEDA website, http://www.neda.org.au/about-us/council-board
[2] National Ethnic Disability Alliance (NEDA), *Membership Organisations*, NEDA website, https://neda.org.au/membership-organisations/

be addressed to maximise the effectiveness, accessibility and safety of Foundational Supports.

People with disability from CALD communities face unique and intersecting challenges when navigating the National Disability Insurance Scheme (NDIS) and other mainstream services. These challenges include limited access to culturally safe healthcare, language barriers, and difficulties navigating complex systems. Refugees and asylum seekers on temporary or no visas often face additional systemic barriers, such as ineligibility for public health and social support systems and the high costs of obtaining necessary evidence for disability support. Ensuring Foundational Supports are designed to address these gaps is essential for achieving equity.

Many in our communities are understandably distressed by the current uncertainty. The introduction of evolving NDIS legislation has raised concerns that the Government is moving too quickly to implement aspects of the Review without first establishing Foundational Supports.

As part of the engagement process, NEDA welcomed the opportunity to conduct three focus groups in partnership with The Social Deck and DSS. We also launched a survey to gather insights from people with disability from CALD backgrounds, their families and carers to shape Foundational Supports that genuinely meet the needs of the communities they are intended to serve. However, the timeframe and turnaround for these consultations—both at the community and strategic levels—pose challenges to achieving meaningful engagement.

NEDA remains committed to working with the Government to realise a vision for Foundational Supports that empowers people with disability to navigate systems as whole individuals, interconnected with community and culture and free from discrimination. We look forward to ongoing advisory and co-development throughout these reforms to advance intersectional disability rights in Australia.

With Thanks

We extend our gratitude to our members and community for their generous contributions to these forums. The insights of CALD people with disability, their families, carers and communities are instrumental to the development of Foundational Supports system that is intersectional and centred on the protection of human rights.

Specific Considerations for People with Disability from CALD Communities

The NDIS Review has acknowledged that Foundational Supports should be designed and delivered to meet the diverse needs of people with disability, including those from CALD backgrounds.[3] It suggests that the Foundational Supports system may need to prioritise funding for supports for intersectional groups, including CALD communities.

As the Foundational Supports system is designed, it is critical to recognise and address the additional barriers experienced by people from CALD communities. There is a risk that a 'more efficient' approach to delivering Foundational Supports could undermine the value of smaller, tailored programs and services that are particularly beneficial to CALD communities. It is particularly important to reach CALD people with disability as it is a cohort that is consistently under-represented in the NDIS, constituting only 9% of participants as of 30 June 2024.[4] Although there is no one definition of cultural and linguistic diversity, relevant data include[5]:

> *As of 10 August 2021, 3 in 10 (28%) people living in Australia were born overseas, around 1 in 4 (23%) Australians spoke a language other than English at home and 3% of Australia's population indicated that they did not speak English well, or at all.*

Non-NDIS general and targeted supports founded on universal access can assist in addressing this gap. This must occur alongside reform to identify and remove barriers to NDIS access for people from CALD backgrounds who are eligible for the Scheme.[6]

Challenges Identified:

- **Difficulties Defining and Understanding Foundational Supports**: Many individuals from CALD backgrounds face challenges in understanding the concept and scope of Foundational Supports, which hinders their ability to engage effectively in the design of the Foundational Supports system.[7]
- **Impact on Meaningful Input into Design**: The lack of clarity around Foundational Supports affects the capacity of CALD communities to provide meaningful input, leading to designs that may not fully address their unique needs.[8]
- **Inclusivity for Those Excluded from Accessing the NDIS**: It is essential to ensure that Foundational Supports are inclusive, accessible and beneficial for individuals

[3] Department of Social Services, *NDIS Review: Final Report* [online], 2023, available at: https://www.ndisreview.gov.au/final-report
[4] NDIA, *Quarterly report to disability ministers: June 2024* [online], available at: https://www.ndis.gov.au
[5] Australian Institute of Health and Welfare, *Culturally and Linguistically Diverse Australians Overview*, AIHW, Australian Government, https://www.aihw.gov.au/reports-data/population-groups/cald-australians/overview
[6] Ethnic Communities' Council of Victoria (ECCV), *NDIS Policy Issues Paper* [online], 2019, available at: https://eccv.org.au/wp-content/uploads/2019/07/ECCV-NDIS-Policy-Issues-Paper_final_27062019.pdf
[7] Department of Social Services, *NDIS Review: Final Report* [online], 2023, available at: https://www.ndisreview.gov.au/final-report
[8] Department of Social Services, *NDIS Review: Final Report* [online], 2023, available at: https://www.ndisreview.gov.au/final-report

excluded from the NDIS, including people on temporary or no visas. The NDIS Cultural and Linguistic Diversity Strategy, 2024-2028 emphasises the importance of outreach and accessible communications to connect with these communities.[9]

Addressing these considerations is vital to developing a Foundational Supports system that is equitable and responsive to the diverse needs of all people with disability, particularly those from CALD communities. Robust engagement with CALD communities, supported by research and culturally competent approaches, is necessary to ensure Foundational Supports meet the unique needs of culturally and linguistically diverse groups.[10] [11]

Engagement with CALD Communities

People with disability from CALD backgrounds must have opportunities to shape and design the development of Foundational Supports. It is critical that Foundational Supports address barriers often experienced by these groups, including language barriers and limited access to culturally safe services and supports. It is necessary to learn directly from these communities, understand their actual needs and identify practical solutions. NEDA is of the view that DSS should work closely with local communities, individual advocates and representative organisations to engage effectively with CALD communities in this reform.

Government must develop and implement Foundational Supports through meaningful consultation with CALD communities. DSS should partner with trusted and well-established multicultural and Disability Representative Organisations (DROs) to lead effective, safe, trauma-aware and healing informed community engagement.

Existing mainstream consultations have shown insufficient direct engagement with CALD communities, and publicly available reporting lacks disaggregated demographic data for these groups, exacerbating the issue. We note that partnered consultations have occurred successfully, but these have been limited in scope and conducted within short timeframes. This has limited opportunities for in-depth information gathering and data collection on the needs of these communities. These barriers risk widening existing gaps in data and understanding of how people with disability from CALD, refugee and asylum seeker backgrounds access, navigate and experience the NDIS, as well as non-NDIS and mainstream disability and health supports.

---

[9] NDIA, *Cultural and Linguistic Diversity Strategy 2024–2028* [online], available at: https://www.ndis.gov.au/about-us/strategies/cultural-and-linguistic-diversity-strategy

[10] Hirsch, A., Khanlou, N., & Parnis, D., *The changing face of disability and refugee services and policy in Australia: Implications for social work* [online], available at: https://research-repository.rmit.edu.au/articles/journal_contribution/The_changing_face_of_disability_and_refugee_services_and_policy_in_Australia_Implications_for_social_work/27520428

[11] Flinders University, *Facilitators to Successful Service Engagement of People with Disabilities from Culturally and Linguistically Diverse Backgrounds* [online], 2021, available at: https://flex.flinders.edu.au/file/b27b78a6-3f6c-43f6-86ad78f11e9c5904/1/Thesis%20Facilitators%20to%20Successful%20Service%20Engagement%20of%20people%20with%20Disabilities%20from%20Culturally%20and%20Linguistically%20Diverse%20Backgrounds.pdf

Ensuring full and proper engagement with CALD communities aligns with the National Disability Insurance Agency's (NDIA) Cultural and Linguistic Diversity (CALD) Strategy 2024–2028. The Strategy, co-designed with over 800 individuals from CALD backgrounds—including participants, families, carers and sector representatives—emphasises the importance of collaboration with CALD communities to ensure the NDIS is accessible and responsive to their needs.[12]

Additionally, the Foundation House *Exploring barriers to engagement: People from refugee backgrounds and disability services* report highlights the necessity of providing genuine opportunities for people from refugee backgrounds with disabilities to contribute to consultation processes.[13] Effective service development requires active involvement from refugee and disability communities to address the specific barriers they face.[14]

By ensuring continuous co-development with people from CALD, refugee and asylum seeker backgrounds, Foundational Supports can be designed to be more inclusive and effective, directly reflecting the insights and needs of the communities it serves.

Recommendation 1: People with disability from CALD backgrounds must have ongoing opportunities to co-develop the overarching frameworks of Foundational Supports and co-design these supports at the service delivery level.

Universal Access

Foundational Supports present an opportunity to address the unmet needs of communities not covered by the NDIS. An equitable non-NDIS system must include individuals from refugee backgrounds on temporary or no visas, as well as those who have self-identified as having a disability but have not yet been able to gather sufficient evidence through the healthcare system to support their claim, which can often be costly.[15]

As noted above, CALD people with disability are consistently under-represented in the NDIS recipient population, constituting only 9% of participants as of 30 June 2024. Non-NDIS general and targeted supports founded on universal access can help address this gap. This must occur alongside reforms to identify and remove barriers to NDIS access for people from CALD backgrounds who are eligible for the Scheme.[16]

Barriers to access, lack of cultural safety, and inadequate or unsafe service provision have maintained the exclusion of CALD communities from NDIS, non-NDIS, and mainstream

[12] NDIA, Cultural and Linguistic Diversity Strategy 2024–2028 [online], available at: https://www.ndis.gov.au
[13] Foundation House, *Exploring barriers to engagement: People from refugee backgrounds and disability services* [online], 2023, available at: https://www.foundationhouse.org.au
[14] AMPARO Advocacy, Improving outcomes for CALD communities in the NDIS [online], 2021, available at: https://www.amparo.org.au/wp-content/uploads/2021/03/AMPARO-report-for-CALD-NDIS-hr-003.pdf
[15] AMPARO Advocacy, *Improving outcomes for CALD communities in the NDIS* [online], 2021, available at: https://www.amparo.org.au/wp-content/uploads/2021/03/AMPARO-report-for-CALD-NDIS-hr-003.pdf
[16] Foundation House, *Exploring barriers to engagement: People from refugee backgrounds and disability services* [online], 2023, available at: https://www.foundationhouse.org.au

supports. These systemic issues are compounded by inequities within healthcare and social support systems.[17] Due to long-standing inequity, Foundational Supports must not only include CALD communities; governments must address inequity proactively through co-design, ongoing consultation, and community partnerships. This approach ensures universal, fair, and equitable access at every stage of support.[18]

Recommendation 2: Foundational Supports, including targeted Foundational Supports, must be available to all people with disability, including those who are currently not covered by the NDIS.

Development of Culturally Inclusive Programs

All programs funded through Foundational Supports must prioritise cultural inclusivity to ensure they meet the diverse needs of people with disability from CALD backgrounds. This includes designing both mainstream programs and CALD-specific initiatives. CALD-specific programs for Foundational Supports might include, but should not be limited to, delivery through settlement services, in-language supports, community-led self-advocacy and peer-support initiatives.[19]

Cultural responsiveness is fundamental to equitable access to the NDIS and the broader disability support system. NEDA supports the Ethnic Communities' Council of Victoria (ECCV) recommendation that the NDIA and disability service providers improve their cultural responsiveness and adequately fund multicultural disability service providers to ensure consumers from culturally diverse backgrounds have equal opportunities to exercise choice and control over their lives.[20]

CALD communities face unique barriers to accessing disability supports, including limited access to culturally responsive services, a lack of in-language resources and systemic inequities.[21] While investment in offering services to CALD communities is a necessity, there is also a need for programs to address barriers by building the skills, knowledge and confidence of individuals within CALD communities to advocate for their needs and navigate the disability support system.[22] By way of example, initiatives such as settlement services

[17] Settlement Services International, *Still outside the tent: Cultural diversity and disability research in Australia* [online], 2023, available at: https://www.ssi.org.au
[18] Victorian Refugee Health Network, *Submission to the Inquiry into Early Childhood Engagement of CALD Communities* [online], 2023, available at: https://refugeehealthnetwork.org.au
[19] Refugee Council of Australia, *Submission to the NSW Parliamentary Inquiry into Settlement Services* [online], 2019, available at: https://www.parliament.nsw.gov.au/lcdocs/submissions/61875/0346%20%20Refugee%20Council%20of%20Australia%20ORIGINAL.pdf
[20] Ethnic Communities' Council of Victoria (ECCV), *NDIS Policy Issues Paper* [online], 2019, available at: https://eccv.org.au/wp-content/uploads/2019/07/ECCV-NDIS-Policy-Issues-Paper_final_27062019.pdf
[21] University of Melbourne, *NDIS Utilisation Report: CALD-specific Findings* [online], 2020, available at: https://disability.unimelb.edu.au/__data/assets/pdf_file/0006/4817643/NDIS-Utilisation-Report-CALD-specific-findings1.pdf
[22] Foundation House, *Exploring Barriers and Building Advocacy: Supporting People with Disability from CALD Communities* [online], 2020, available at: https://foundationhouse.org.au/wp-content/uploads/2020/02/FINAL_FDH0126_DISABILITY-REPORT-2019_A4_online.pdf

play a critical role in addressing the needs of people from refugee, asylum seeker and and newly arrived migrant backgrounds with disability.[23]

Foundational Supports must align with the NDIA *Cultural and Linguistic Diversity (CALD) Strategy 2024–2028* (the CALD Strategy). The CALD Strategy highlights the importance of culturally inclusive and responsive supports, advocating for programs that reflect the lived experiences of CALD participants and foster meaningful engagement with these communities.[24]

Recommendation 3: All programs funded through Foundational Supports must be informed by an analysis of how the program will support people with disability with intersectional experiences, including groups from CALD and non-resident backgrounds.

Specific Funding Streams

NEDA recommends the Australian Government establish specific funding streams to support new and existing grassroots and community groups that connect people with disability from CALD backgrounds with local programs led by organisations and individuals at the intersection of cultural and linguistic diversity and disability.

Specialised programs/targeted Foundational Supports must be developed to provide information and advice, peer-support, capacity building, self-advocacy and decision-making support. These programs should be culturally safe and appropriate, enabling CALD participants to access services that meet their unique needs and empower them to navigate systems like the NDIS.[25]

An example of this approach is Disability & Diversity Victoria (DDV), an organisation that provides tailored community-based support and advocacy for CALD individuals with disability. DDV helps bridge the gap between cultural diversity and disability services, supporting individuals to access and navigate the NDIS. Such initiatives highlight the importance of grassroots programs in ensuring equitable service access.[26]

Those from refugees and asylum seeker backgrounds with disability typically face significant barriers to accessing supports, including a lack of interpreters, limited culturally responsive services, lack of trust in government and challenges meeting NDIS eligibility requirements.[27] The Refugee Council of Australia has emphasised that tailored settlement services and community programs play a vital role in addressing barriers and improving service access for

[23] Refugee Council of Australia, *Submission to the NSW Parliamentary Inquiry into Settlement Services* [online], 2019, available at: https://www.parliament.nsw.gov.au/lcdocs/submissions/61875/0346%20%20Refugee%20Council%20of%20Australia%20ORIGINAL.pdf
[24] NDIA, *Cultural and Linguistic Diversity Strategy 2024–2028* [online], available at: https://www.ndis.gov.au
[25] Harmony Alliance, *Women and Girls with Disability from CALD Backgrounds: National Consultation Report* [online], 2023, available at: https://www.harmonyalliance.org.au/wp-content/uploads/2023/12/CALD-WGwD-V3-ISBN.pdf
[26] Disability & Diversity Victoria, *Organisational Overview* [online], available at: https://www.ddvic.org.au
[27] Harmony Alliance, *Women and Girls with Disability from CALD Backgrounds: National Consultation Report* [online], 2023, available at: https://www.harmonyalliance.org.au/wp-content/uploads/2023/12/CALD-WGwD-V3-ISBN.pdf

newly arrived migrants, those on temporary visas, and people from refugee and asylum seeker backgrounds with disability.[28] Addressing these issues requires sustained investment in grassroots programs that meet the intersectional needs of these communities.

Recommendation 4: Government must recognise the importance of dedicated funding streams to support people with disability from CALD backgrounds by investing in current and emerging CALD and disability-led grassroots programs.

Targeted Communications

People with disability from CALD backgrounds face significant barriers to accessing and navigating disability supports, particularly during periods of transition, such as the introduction of new services and changes to existing supports or policy reforms. Strategic communication is essential to address these barriers, ensuring that messages are culturally appropriate and delivered through preferred community channels.

Information must be timely, accessible and available in multiple languages and formats, including plain language, audio recordings, Braille and Easy Read. Professional interpretation and translation services are critical at every stage to prevent language barriers from limiting access. Beyond translation, culturally sensitive delivery is critical to building trust, respecting community values and maintaining meaningful engagement with communities.[29]

Traditional channels, such as government websites or mainstream media, are often insufficient or ineffective for reaching CALD communities. Focus group participants emphasised the importance of local and trusted grassroots networks, such as in-language radio broadcasting, faith and community leaders and partnerships with community cultural groups.[30] These channels ensure that messages are not only delivered, but also understood and actionable, addressing the gap between accessing information and being able to use it effectively to navigate systems, find supports and self-advocate. The need for flexible and adapted communication was emphasised by the participants in the co-delivered NEDA and The Social Deck focus group sessions.

Timing is equally critical. Information must be circulated well in advance of changes, giving individuals, their families and carers ample time to understand adjustments and seek support if required. Regular, proactive updates from governments must be culturally safe, accessible and respectful and tailored to the diverse needs and expectations within CALD communities.

---

[28] Refugee Council of Australia, *Submission to the NSW Parliamentary Inquiry into Settlement Services* [online], 2019, available at: https://www.parliament.nsw.gov.au/lcdocs/submissions/61875/0346%20%20Refugee%20Council%20of%20Australia%20ORIGINAL.pdf
[29] AMPARO Advocacy, *Improving outcomes for CALD communities in the NDIS* [online], 2021, available at: https://www.amparo.org.au/wp-content/uploads/2021/03/AMPARO-report-for-CALD-NDIS-hr-003.pdf
[30] AMPARO Advocacy, *Improving outcomes for CALD communities in the NDIS* [online], 2021, available at: https://www.amparo.org.au/wp-content/uploads/2021/03/AMPARO-report-for-CALD-NDIS-hr-003.pdf

Digital literacy and digital communications also play an essential role in ensuring information accessibility and effectiveness.

A targeted communications strategy should empower people with disability from CALD backgrounds by equipping them with the knowledge and tools to advocate for themselves and supporting them to make informed decisions. Such a strategy must align with the Australian Disability Strategy and the CALD Strategy, ensuring consistency with broader policy frameworks.[31] [32]

By supporting cultural and linguistic diversity and leveraging trusted community channels, a well-designed cultural communications strategy can bridge gaps in access, increase trust and engagement, and support CALD communities through significant transitions.

Recommendation 5: Government must commit to a targeted communications approach to ensure information about Foundational Supports reaches CALD communities and audiences.

Data and Evaluation

The NDIS Review called for the creation of an outcomes framework for Foundational Supports to track, measure, and report on outcomes for people with disability at national, state and local levels.[33] It is essential that this framework includes data capable of evaluating the experiences and outcomes of people from CALD backgrounds. Dedicated analysis is required to ensure Foundational Supports meets the needs of CALD communities and addresses any gaps in support and service delivery. Analysis should also include identifying unmet need, and the steps required to address and support people who are not accessing disability supports.

NEDA focus groups highlighted the need for open feedback channels, enabling people with disability from CALD backgrounds, their families and carers, to anonymously and safely share their experiences with services and supports. Such feedback should inform public information about the cultural competence and safety of services, while also providing pathways for people to seek additional assistance to obtain the support they need. Participants emphasised the importance of regular audits, ongoing opportunities for person-led monitoring and evaluation, and prompt responses to quality and safeguarding concerns raised through feedback, with a focus on continuous improvement.

Recommendation 6: In accordance with the NDIS review, Government must commit to co-develop of an evaluation framework for Foundational Supports that tracks, measures and reports outcomes for people with disability at a national, state and local levels.

---

[31] Australian Government, *Australian Disability Strategy 2021–2031* [online], available at: https://www.disabilitygateway.gov.au/strategy
[32] NDIA, *Cultural and Linguistic Diversity Strategy 2024–2028* [online], available at: https://www.ndis.gov.au
[33] Department of Social Services, *NDIS Review: Final Report* [online], 2023, available at: https://www.ndisreview.gov.au/final-report

Service Mapping and Gaps Analysis

The current lack of actionable research and evidence limits a fulsome understanding of the nuanced experiences of people with disability from CALD backgrounds, including those from recent migrant, temporary visa, refugee and asylum seeker communities. Without effective data collection, existing knowledge gaps will limit the design of new services and meaningful system reform.

Prioritising research as a building block in developing Foundational Supports is essential to the success of this reform. A strong evidence-base on how CALD communities use, and experience disability services and supports will enable design of programs that genuinely meet the diverse needs of people with disability.

The current lack of actionable research and evidence limits understanding of the diverse experiences of people with disability from CALD backgrounds. Without effective data collection, existing knowledge gaps will constrain the design of new services and meaningful system reform. Despite long-standing commitments to equity by Australian governments, a national audit of disability research recently concluded that people from CALD backgrounds are significantly under-represented in the evidence base.[34] [35]

Inconsistent data collection across health, development, and early childhood services further exacerbates the issue, hindering comprehensive analysis and informed decision-making.[36] A recent submission emphasised the lack of consistent data collection in these systems, limiting the ability to address inequities effectively.[37] The absence of reliable data limits the capacity to identify service gaps and understand how people with disability from CALD backgrounds navigate disability and mainstream supports.[38] [39]

Comprehensive service mapping and gaps analysis, supported by robust and consistent data collection, will provide a stronger evidence base on how CALD communities use and experience disability services and supports. This will enable the design of programs that genuinely meet the diverse needs of people with disability and promote equitable access to services.[40] There must be rigorous and co-developed data collection principles to ensure

[34] Settlement Services International, *Still outside the tent: Cultural diversity and disability research in Australia* [online], 2023, available at: https://www.ssi.org.au/wpcontent/uploads/2023/05/Still_outside_the_tent_Accessible.pdf
[35] Soldatic, K., *Cultural diversity and disability: From margins to mainstream* [online], Disability & Global South Journal, vol. 2, no. 1, 2015, available at: https://dgsjournal.org/wp-content/uploads/2012/06/dgs-02-01-06.pdf
[36] Franklin, M., *Enhancing data capacity for inclusive disability services* [online], 2021, available at: https://eprints.qut.edu.au/221765/
[37] Victorian Refugee Health Network, *Submission to the Inquiry into Early Childhood Engagement of CALD Communities* [online], 2023, available at: https://refugeehealthnetwork.org.au/wp-content/uploads/2023/06/VictorianRefugeeHealthNetwork_Submission_Inquiry_into-Early-Childhood-Engagement-of-CALD-Communities.pdf
[38] Refugee Council of Australia, *Barriers and exclusions: The support needs of refugees with disabilities* [online], 2019, available at: https://www.refugeecouncil.org.au/disability-report/16/
[39] AMPARO Advocacy, *Improving outcomes for CALD communities in the NDIS* [online], 2021, available at: https://www.amparo.org.au/wp-content/uploads/2021/03/AMPARO-report-for-CALD-NDIS-hr-003.pdf
[40] AMPARO Advocacy, *Improving outcomes for CALD communities in the NDIS* [online], 2021, available at: https://www.amparo.org.au/wp-content/uploads/2021/03/AMPARO-report-for-CALD-NDIS-hr-003.pdf

consistency with cultural norms and community expectations regarding respectful and safe engagement and data collection.

Recommendation 7: Government must fund comprehensive research, service mapping and gap analysis to better understand how people with disability from CALD backgrounds experience NDIS and non-NDIS services and supports, including mainstream healthcare and mental health services.

Public Health Partnerships

Effective Foundational Supports cannot be developed in isolation from the broader health system. Collaboration between disability and health agencies is critical to building cross-sectoral capacity. A fragmented approach or failure to engage with the public health sector risks undermining the success of this reform. The importance of cross-sector collaboration is well-documented, as integrated health systems can improve outcomes for people with disabilities by addressing systemic barriers and interdependencies.[41]

To date, there has been insufficient consultation and engagement with the health sector, despite the interdependencies between Foundational Supports and mainstream health and mental health services. To address the complex problem of the NDIS as a "Lonely Life Raft," Government must take considered action to integrate disability competence and capacity-building throughout the health system and across the life cycle.[42] Without this, while the raft may grow larger, it will remain just as isolated. Research emphasises that integrating disability perspectives into health planning is essential for reducing disparities and improving inclusivity across health and social care systems.[43]

NEDA consulted with our community to listen and gather experiences of non-NDIS disability supports among CALD and refugee communities. This was conducted through one survey and three focus groups. Qualitative analysis of survey and focus group responses identified health systems as a consistent and significant theme in discussions of disability support. Such consultation aligns with findings that inclusive health systems require ongoing dialogue with underrepresented groups to better address inequities.[44]

While General Practitioners were highlighted by survey respondents and focus group participants as a primary source of information on disability supports, community members also voiced concerns around limited access to prescriptions and culturally safe mental health care.

---

[41] Annual Reviews, *Integrated public health systems: Lessons learned* [online], vol. 24, 2003, available at: https://www.annualreviews.org/content/journals/10.1146/annurev.publhealth.24.100901.140844
[42] Samantha Parker, "Rip-off the Bone: Aussies Horror Find," *news.com.au*, Australian Government, https://www.news.com.au/finance/money/costs/rip-off-the-bone-aussies-horror-find/news-story/817f7da7f1cc82fc00150ea96f810dbd
[43] MDPI, Cultural competence in disability services: Addressing barriers [online], vol. 15, 2018, available at: https://www.mdpi.com/1660-4601/15/2/328
[44] Wiley Online Library, The role of community consultation in inclusive health systems [online], vol. 27, 2014, available at: https://onlinelibrary.wiley.com/doi/abs/10.1111/jar.12135

A NEDA staff survey respondent raised that bulk-billed appointments with specialist physicians would be beneficial for them:

"Free specialist and allied health appointments [should be available] so that each appointment, if lucky enough to afford one, does not feel as high stakes/stressful when the practitioner ends up being racist, sexist, ableist etc."

This highlights the urgent need for affordable, culturally safe health services that are free from discrimination based on disability, race, ethnicity, language or gender. Evidence supports this need, noting that cultural competence in health care delivery not only enhances equity but also improves overall health outcomes.[45]

Intersectional lived experience of disability means that the lived experiences of people with disability often involve multiple, overlapping aspects of identity that cannot be effectively addressed within the siloed boundaries of individual government departments or sectors. Effective collaboration and communication between the disability and health sectors is crucial to identifying gaps and establishing comprehensive, system-wide support.

Recommendation 8: The NDIA and DSS must collaborate with State, Territory, and Federal health departments and peak bodies to ensure that Foundational Supports, including targeted supports, is effective and sustainable.

[45] MDPI, Cultural competence in disability services: Addressing barriers [online], vol. 15, 2018, available at: https://www.mdpi.com/1660-4601/15/2/328