



16 January 2024

Commonwealth Disability Royal Commission Taskforce  
GPO Box 9820  
Canberra ACT 2601

By email: [DRCResponseConsultation@dss.gov.au](mailto:DRCResponseConsultation@dss.gov.au)

Dear Taskforce,

**Amaze submission to consultation on Disability Royal Commission response.**

Amaze works to build acceptance and understanding of autism in communities, educational settings, organisations and businesses, and wider society. Informed by evidence, experts and lived experience, we influence policy change for Autistic people and provide independent, credible information and resources to individuals, families, professionals, government, and the wider community. We are closely connected with the community through our national Autism Connect helpline, peer support networks and capacity building initiatives.

**We applaud the Disability Royal Commission for its dedicated and exemplary work and in principle, we support each of its unanimously agreed recommendations.** Informed by evidence and lived experience, these recommendations have the capacity to drastically change the lives of people with disability across Australia. We also acknowledge the bravery of all people with disability who shared their stories and ideas with the Commission, as well as acknowledging those who were unable to do so.

**Our submission asks that the Australian Government:**

1. Lead its reforms with a Disability Rights Act.
2. Apply an 'autism lens' to the reform process (i.e., disaggregated targets to increase the proportion of Autistic employees in the public service).
3. Establish an Autism Healthcare Framework and Centre for Excellence.
4. Take an evidence-informed approach to inclusive education, housing and employment prioritising the building of a skilled workforce.
5. Establish a Disability Reform Implementation Council to oversee an integrated response to both the NDIS review and DRC recommendations.

## **1. Lead the reforms with a Disability Rights Act.**

As a first step, and to drive the comprehensive reforms recommended by the Commission, we support the co-design of a Disability Rights Act. As recommended by the Commission, this Act should create a legislative framework for proactive and positive actions towards inclusion and long-term systemic change. It should also ensure that the perspectives and voices of all people with disability, including Autistic people and their families are at the centre of all policy and programs that impact them (and the reform process). Co-design of the Act, and all future policy and programs, must be undertaken in collaboration with a wide and diverse range of people with different lived experiences to ensure that varying perspectives and experiences are accounted for in the development of the reforms.

To ensure a sustained commitment by Australian Governments to a National Autism Strategy, that sets ambitious targets and dedicated actions to improve the lives of Autistic people and their families, consideration should be given to embedding the Strategy in the Disability Rights Act. The Act could provide a clear framework regarding the Strategy's visions, principles, timeframes, periodic review and co-design requirements (including for implementation, evaluation and review). Learnings may be taken from other jurisdictions. See for example, England's *Autism Act* (2009) which makes it mandatory for the English Government to have an autism strategy and review it every 5 years.

## **2. Apply an 'autism lens' to the reforms.**

Evidence provided to the Commission highlighted many of the unique barriers to accessibility and inclusion experienced by Autistic people, poor outcomes across multiple domains and the frequent need for autism specific solutions. This echoed the Senate Select Committee on Autism's [Services, support and life outcomes for Autistic Australians report \(2022\)](#) which found that disability wide reforms have not always benefited Autistic people and recommended the co-design of a National Autism Strategy (NAS), now under development.

To build an understanding of where autism specific solutions may be required, we recommend the Government tap into the NAS's current development. It is vital that reforms flowing from the Commission's recommendations and the NAS are integrated and not siloed. The Strategy's current development also provides a valuable opportunity for experts, including people with lived experience in the Strategy's Oversight Council and working groups to work with Government on how the Commission's recommendations can strengthen the strategy and improve government policy for Autistic people more broadly.

Employment provides a clear example of where autism specific approaches may be required. Autistic people experience some of the worst employment rates and outcomes of all people with disability. In 2018, the [Australian Bureau of Statistics](#) reported that only 38% of Autistic people of working age had a job, compared with 53% of all working age people with disability and 84% of people without disability. The unemployment rate for Autistic people was 34%, more than three times the rate for people with disability generally (10.3%) and almost eight times the rate of people without disability (4.6%). As recognised by the Senate Select Committee on Autism (2022), autism specific solutions are required. For example, while the Commission recommended disaggregated targets to increase the proportion of employees in the public sector with cognitive disability, the Government should also introduce disaggregated targets to increase the proportion of Autistic employees in the public service.

### **3. Establish an Autism Healthcare Framework and Centre for Excellence.**

A Healthcare Capability Framework is urgently needed to drive the education and training of healthcare professionals in autism. The Commission recommended expanding the scope of work on ‘an intellectual disability health capability framework’ for education and training to include autism specific content (recommendation 6.25). However, within its report, the Commission also recognised that it may be appropriate to prioritise a separate disability health capability framework relating to “autism and other cognitive impairments”. The Commission emphasised that if creating a separate Framework, co-design of the Framework should commence immediately and not be postponed until after the National Roadmap to improve the health and mental health of Autistic Australians has been developed (Volume 6, p.361).

Given findings by the Senate Select Committee on Autism (2022) that autism specific solutions are required for healthcare, and the extensive work currently being undertaken to co-design a National Roadmap to improve the health and mental health of Autistic Australians, we recommend that a separate Autism Health Capability Framework be prioritised and co-designed now, alongside the Roadmap’s development (utilising the Roadmap’s co-design processes, and its Working Group and Stakeholder Reference Group).

Similarly, while the Commission recommended expanding the remit of the National Centre of Excellence in Intellectual Disability Health to include autism and other forms of cognitive impairment (recommendation 6.30), we recommend co-designing a separate National Centre of Excellence in Autism to bring together experts, resources and research specifically on autism healthcare.

#### **4. Take an evidence-informed approach to inclusive education, housing and employment, prioritising the building of a skilled workforce.**

We strongly support the Commission's unanimously agreed recommendations for inclusive education, employment and housing. Fully implemented, these recommendations would vastly improve the lives of all people with disability, including Autistic people and their families.

The Commissioners were divided on the complex question of desegregation in education, housing and employment, including recommended timeframes. They all agreed that considerable change will be required to address current barriers to inclusion and make all mainstream settings fully inclusive.

In considering a response to these differing recommendations, an evidence-informed approach must be taken (informed by literature, data, modelling and lived experience). It's critical that priority also be given to the considerable investment and planning that will be required to build a workforce capable of supporting inclusion across each of these settings.

In relation to education, we support the priority development of a National Roadmap for Inclusive Education (including safe and quality education) that:

- prioritises a pathway for building a skilled workforce and infrastructure capable of supporting meaningful and rights-based inclusion;
- drives implementation and evaluation of consistent state and territory education reforms (in response to the Commission's unanimously agreed recommendations); and
- drives research, data collection and modelling to inform appropriate reforms to mainstream and non-mainstream or segregated schooling across Australia.

Similarly, significant employment reform, economic modelling and capacity building will be required to make open employment settings inclusive for all people with disability and commence a shift to the social firm model. We support the development of a National Inclusive Employment Roadmap that prioritises the building of a workforce capable of supporting inclusion and drives economic and programmatic modelling. It should also aim to drive and evaluate better pathways to work for people with disability, reforms to support inclusive work practices and supports for people with disability to move from ADE's to open employment (if they wish to do so).

#### **5. Immediately establish a Disability Reform Implementation Council.**

A Disability Reform Implementation Council is urgently required to drive and measure an integrated response to disability reform across Australia, including an integrated response to the Commission's recommendations and the NDIS Independent review.

**Amaze is ready to assist.**

Please contact me by email at [jim.mullan@amaze.org.au](mailto:jim.mullan@amaze.org.au) or by phone on [03 9657 1600](tel:0396571600) if we can assist by providing further information or answering any questions you may have.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jim Mullan'.

Jim Mullan  
Chief Executive Officer