



Australian Federation of
Disability Organisations

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30 October 2023

Ms. Annabell Fenton
Stakeholder Engagement - National Autism Strategy
Department of Social Services
Via email to: annabell.fenton@dss.gov.au

Dear Annabell,

Re: Feedback to Inform the Development of a National Autism Strategy

I am writing in response to the Department's discussion paper entitled, '*Developing the National Autism Strategy*', which was published in September this year. I understand the deadline for submissions responding to this discussion paper has passed, however, it is critical that AFDO takes the required time to ensure it represents the needs and concerns of our members in all aspects of our work. As such, we needed to speak to our four relevant member organisations concerning Autism, to gauge their thoughts on the discussion paper prior to being able to respond.

We convened a meeting with representatives from the following AFDO member organisations:

- Autism Aspergers Advocacy Australia (A4)
- Amaze
- Aspergers Victoria
- South West Autism Network (SWAN)

I have included several key points below, based on the discussion that took place during this meeting:

- AFDO member A4, the DSS funded national peak body for people with Autism, advised that, despite their continued advocacy, they have not been approached directly by the Department regarding the development of the National Autism Strategy. This appears to be a significant oversight and we request the Department engage more meaningfully with A4 as the national peak, and other key disability representative organisations as the Strategy is being developed.

- We would also like to have seen the discussion paper do more to build on the findings and on the 81 recommendations that came out of the recent Senate Select Committee on Autism's Inquiry into Services, Support and Life Outcomes for Autistic People. Autistic people and their representative organisations have already allocated significant resources to that Inquiry and had provided their input as part of its process. We would recommend that the Strategy should utilise the implementation of the recommendations that came out of this body of work.
- Considering the above, we were frustrated that our members and the wider autism community, had been asked to provide input again with many of the issues raised in the discussion paper having already been canvassed and responded to in detail in the Senate Inquiry and which should have been taken into account in the drafting of this discussion paper.

This was made more problematic given the extremely short period of time in which they were allowed to provide feedback. Given the scope of the national Strategy, a 3-month consultation period would have been more appropriate. This would have enabled our members to undertake more meaningful consultation with people with lived experience at the grass roots level.

- We fail to understand why this Strategy is still not being developed as an associated plan underneath Australia's Disability Strategy 2021-31. The Department must clarify how the National Autism Strategy will intersect with *Australia's Disability Strategy 2021-31*, and other relevant strategies such as the National *Disability Employment Strategy*.
- We would like to see specific measures relating to autism incorporated into the targeted action plan on awareness-raising that exists underneath Australia's Disability Strategy 2021-31. Autism requires specific attention because it exists on a spectrum and is also an invisible form of disability.
- It must be acknowledged that autism exists on a spectrum and there is no one-size fits all approach. To be effective, an autism strategy will need to incorporate measures to meet the needs of people along the entire spectrum – including those with the highest support needs.
- In line with the above, the issue of diagnosis was not raised in the discussion paper and we would recommend that this area must be considered and covered in the final strategy.
- Whilst we were pleased to see the issue of intersectionality addressed in the discussion paper, it also needs to include consideration of dual diagnosis. For example, the strategy should explore the crossover between autism and ADHD, intellectual disability, depression, and anxiety etc.
- Once adopted and in terms of reporting on progress with the Strategy, we recommend annual reporting, with a report being tabled in Parliament on or near World Autism Day each year.

- We would recommend the Government commit to the establishment of a separate National Centre of Excellence in autism, drawing on the structure and functions of the National Centre of Excellence for Intellectual Disability. This based on the numbers of those now diagnosed compared to the total population and the need to ensure that the autism community is provided with greater opportunities for inclusion and awareness.
- We support the development of a National Roadmap to Improve the Health and Mental Health of Autistic People. We would also like to see Government prioritise the development of a separate autism healthcare capability framework that includes clear targets, outcomes and measures for accountability. We recommend that this framework should then be reviewed every three years.
- Employment is a critical issue in the Autism space. Some Autistic people are very well suited to certain fields and are highly sought after and employable. Others who are on different areas of the spectrum including non-verbal, are typically bullied, harassed, and traumatised. Schools tend to deal with this better than employers with autistic people experiencing some of the worst employment outcomes of any cohort.
- Issues relating to the employment of Autistic people were never captured under Australia's Disability Strategy 2021-31, so it is critical that they are adequately addressed under the National Autism Strategy. If you set targets for a spectrum disorder such as Autism, experience with disability employment shows, that employers will pick "easy wins" and will not focus on the people with the highest support needs. Greater innovation and detailed consideration is needed to drive improved outcomes in this area.

The points raised above reflect some of our high-level thoughts on the proposed Strategy. We would all be open to discussing this feedback with you or one of your colleagues in greater detail and look forward to being involved in the next stage of consultations.

Should you have any further questions, please do not hesitate to get in touch. You can contact our Senior Systemic Advocate, Lauren Henley on 0493 623 709, or at lauren.henley@afdo.org.au or myself as shown below.

Kind regards,



Ross Joyce
Chief Executive Officer

"As CEO, I am living and working remotely at times on Wadawurrung and Dja Dja Wurrung Country, as well as Wathaurong Country and Wurundjeri Country and pay my deep respects"

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