Submission to the NSW Reconstruction Authority

Disability Inclusion Action Plan 2026-2029

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1. Executive summary

NableU Community Systems Incorporated welcomes the opportunity to contribute to the NSW Reconstruction Authority's first Disability Inclusion Action Plan.

NableU is a NSW not-for-profit community association working to reduce barriers experienced by people with disability and neurodivergent people. Our work addresses accessibility, agency, cognitive equity, support coordination, community capability and the design of systems that enable meaningful participation.

We approach disaster inclusion as a practical systems problem.

A person may receive an emergency warning yet remain unable to act upon it. They may understand the danger but lack accessible transport. They may reach an evacuation centre but lose access to essential disability supports, communication technology, medication, equipment or the environmental conditions necessary to function safely.

During recovery, the same person may be required to navigate unfamiliar agencies, complete complex forms, repeatedly explain their circumstances and coordinate services that ordinarily operate independently.

Each system may appear accessible when examined separately, while the complete experience remains inaccessible.

Our central recommendation is that the Authority measure disability inclusion through the preservation and restoration of people's effective agency, safety, essential supports and capacity to participate throughout disaster preparedness and recovery.

We recommend that the Disability Inclusion Action Plan establish operational commitments across eight areas, with accountable owners, measurable outcomes and public implementation reporting.

2. The governing principle: accessibility under system disruption

Conventional accessibility measures often assume functioning infrastructure, predictable circumstances and sufficient personal capacity to navigate available services.

Disasters invalidate these assumptions.

Electricity, telecommunications, transport, accommodation, support workers, essential supplies and familiar routines can become unavailable simultaneously.

For people with disability, the loss of one supporting system may make several others unusable.

Disaster resilience planning should therefore examine the dependencies that enable a person to act, including the conditions under which those dependencies fail.

We propose the following principle:

A disaster inclusion system should remain usable, or provide an effective alternative, when the ordinary infrastructure and support relationships on which a person depends are disrupted.

This requires planning for physical, sensory, cognitive, executive-function, communication and psychosocial barriers. Disability type alone is insufficient to establish a person's practical support requirements.

3. Recommended actions

Recommendation 1 - Embed person-centred emergency preparedness across community planning

The Authority should build upon the existing Person-Centred Emergency Preparedness (P-CEP) framework and Disability Inclusive Emergency Management (DIEM) resources.

Community preparedness programs should help people identify their actual functional dependencies, preferred communication methods, essential support relationships and contingencies for sheltering in place, evacuating and recovering.

Individual preparedness plans should remain under the person's control wherever possible, with appropriate supported decision-making.

Plans should be portable and available in practical offline formats where needed.

Where information must be shared with emergency or recovery partners, its use should be purpose-specific, proportionate and subject to clear consent or other lawful authority.

Participation should not require enrolment in a compulsory disability registry.

Recommendation 2 - Make communications cognitively accessible and resilient

Accessible communication must extend beyond meeting digital or document formatting standards.

Information should be understandable, actionable and available through more than one channel.

Authority communications about preparedness, recovery assistance, accommodation, grants, community engagement and service changes should offer accessible written and non-digital alternatives, including plain language, Easy Read, Auslan and other appropriate formats.

A person who cannot reliably use telephone communication should not be excluded from services because a telephone call is the only available pathway.

Important communications should identify the required action, relevant deadline, available assistance and a clear route to obtain clarification.

The Authority should test its own public communications with people who experience cognitive, communication, sensory and executive-function barriers.

Where emergency warnings are delivered by other agencies, the Authority should work with those agencies to promote accessible and actionable communication.

Recommendation 3 - Establish practical continuity arrangements across agencies and support systems

Disaster recovery frequently requires coordination between emergency services, local government, health services, disability providers, the NDIS, transport operators, housing services and community organisations.

A person with disability should not be expected to independently resolve every gap between these systems.

The Authority should establish, within its recovery coordination responsibilities, clear interagency protocols for identifying and escalating interruptions to essential disability supports.

These protocols should address circumstances in which disability support workers are unavailable, accessible accommodation cannot be found, essential equipment becomes unusable, or medication and healthcare access are disrupted.

Each identified gap should have a responsible coordination pathway and a clear escalation point.

The Authority need not assume the statutory functions of other agencies. It should identify the responsible organisations, formalise appropriate referral and coordination arrangements, and test whether those arrangements function during disruption.

Recommendation 4 - Establish functional accessibility standards for recovery centres and accommodation

Recovery facilities should be assessed by whether people with different disabilities can actually use them.

Physical access is necessary, but insufficient.

Assessment should include accessible transport, communication support, sensory environments, quiet spaces, accessible toilets and personal care facilities, equipment charging and power continuity, assistance animals, and the ability to maintain essential support relationships.

Temporary accommodation arrangements should also account for functional needs, including accessible bathrooms, mobility, communication technology, medication storage, proximity to essential supports and predictable environments.

The Authority should incorporate appropriate accessibility requirements into the recovery services, facilities and accommodation arrangements it directly controls, procures or influences through funding.

Recommendation 5 - Reduce administrative burden throughout disaster recovery

Recovery processes often require people to make consequential decisions while experiencing displacement, distress, financial uncertainty or loss of ordinary supports.

Disability-related barriers can compound these demands.

The Authority should ensure that its recovery assistance and grant processes support accessible communication, reasonable adjustments, assistance with applications, appropriately authorised representatives, and alternatives where standard documentation cannot reasonably be obtained.

People should be able to understand the status of their application, outstanding requirements, reasons for decisions and available review pathways.

Where information can lawfully and appropriately be reused, unnecessary repeated disclosure should be reduced.

The design objective should be to minimise avoidable cognitive and administrative work while preserving appropriate verification, privacy and accountability.

Recommendation 6 - Establish continuing disability-led participation

Consultation during development of the Plan is valuable, but disability-inclusive emergency management also requires involvement during implementation and evaluation.

The Authority should establish structured, accessible and appropriately remunerated mechanisms through which people with disability can contribute to preparedness exercises, service assessments, community recovery planning and review of actual disaster experiences.

Participation should represent diverse disabilities, communication methods, regional circumstances and support arrangements.

Particular attention should be given to people who are frequently excluded from conventional consultation, including people with intellectual disability, neurodivergent people, people with significant communication support needs and people who cannot attend conventional meetings.

Representatives and advocates can contribute important expertise, while the preferences and experiences of people directly affected should remain central.

Recommendation 7 - Integrate disability inclusion into procurement, reconstruction and organisational capability

Disability inclusion should inform the Authority's ordinary operating decisions, rather than depend upon a separate accessibility initiative.

Relevant procurement, funded activities, community programs and reconstruction planning should incorporate proportionate accessibility criteria and mechanisms to verify delivery.

Staff and contractors should receive training appropriate to their responsibilities, including practical application of existing disability-inclusive emergency management frameworks.

The Authority should also provide accessible recruitment, workplace adjustments, training and career development for employees with disability, consistent with the broader requirements of a Disability Inclusion Action Plan.

The effectiveness of training should be assessed through demonstrated capability and practical outcomes, rather than attendance alone.

Recommendation 8 - Establish measurable outcomes and independently review progress

The Authority's existing disability-inclusive emergency management activities provide a useful starting point.

Its 2024-25 annual report describes DIEM training, disability-inclusive emergency planning forums and the identification of priority local government areas for expanded activity.

The new Plan should explain how these activities will lead to verifiable improvements.

We recommend that the Plan identify a responsible officer or business area, implementation timeframe, baseline and measurable indicator for each substantial action.

Appropriate indicators could examine the accessibility of recovery facilities and communications, availability of alternative service channels, time taken to resolve disability-related recovery barriers, continuity of essential supports, outcomes from disaster exercises, and evidence that identified problems have been corrected.

Measures should capture outcomes and unresolved barriers as well as activity.

Annual public reporting should identify completed actions, delayed commitments, barriers encountered and corrective work.

Independent assessment and direct feedback from people with disability should inform the review of progress.

4. Integration with existing disaster management frameworks

The Authority should explicitly connect its Disability Inclusion Action Plan with the NSW Recovery Plan, State Disaster Mitigation Plan, relevant Disaster Adaptation Plans and local preparedness and recovery arrangements.

The existing P-CEP, Disability Inclusive Disaster Risk Reduction and DIEM frameworks provide foundations for this work.

We do not recommend developing a competing framework where suitable nationally recognised resources already exist.

The three-year Plan should explain which established frameworks will be used, which additional responsibilities the Authority will undertake, and how the effectiveness of implementation will be demonstrated.

This approach also supports the four focus areas of the NSW Disability Inclusion Plan 2026-2029, especially creating safer communities and improving access to mainstream services through better systems and processes.

5. A practical three-year implementation approach

Year 1 - Establish the operational baseline.

Map existing disability-inclusive preparedness and recovery capabilities, identify responsibility gaps, conduct accessibility assessments, engage people with disability and publish baseline measures and implementation responsibilities.

Year 2 - Implement and test improvements.

Apply improved communication, recovery coordination, facility and administrative standards. Conduct realistic preparedness and recovery exercises with people with disability and relevant partner organisations. Document failures and corrective actions.

Year 3 - Demonstrate outcomes and institutionalise improvements.

Evaluate the practical outcomes, independently assess selected high-risk functions, publish implementation results and incorporate successful arrangements into continuing operational policies, procurement requirements and regional planning.

6. Closing position

The NSW Reconstruction Authority has an opportunity to establish disability inclusion as an essential part of effective disaster resilience.

The ultimate test is whether people with disability can understand their circumstances, make informed decisions, maintain essential supports, access recovery assistance and participate in rebuilding their communities when ordinary systems are under pressure.

NableU encourages the Authority to adopt a Disability Inclusion Action Plan that is operationally integrated, informed by lived experience, accessible by design and accountable for measurable improvements.

We welcome opportunities to contribute further to practical cognitive accessibility, participant-led planning, support continuity and the evaluation of inclusive systems.

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Supporting policy and evidence references

NSW Disability Inclusion Act 2014: Sections 12 and 13, covering disability inclusion action planning and implementation reporting.
https://legislation.nsw.gov.au/view/html/inforce/current/act-2014-41

NSW Disability Inclusion Plan 2026-2029: Whole-of-government disability inclusion priorities.
https://dcj.nsw.gov.au/community-inclusion/disability-and-inclusion/nsw-disability-inclusion-plan-2026-2029.html

NSW Reconstruction Authority Annual Report 2024-25: Disability-inclusive preparedness initiatives and existing recovery activities.
https://www.nsw.gov.au/sites/default/files/2026-01/nsw-reconstruction-authority-annual-report-2024-25.pdf

National Emergency Management Agency - Disability Inclusive Emergency Management: Toolkit, national research and implementation resources.
https://www.nema.gov.au/our-work/resilience/diem

UN Convention on the Rights of Persons with Disabilities: Article 11, concerning protection and safety in situations of risk and natural disasters.
https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-11-situations-of-risk-and-humanitarian-emergencies.html