



Australian Federation of
Disability Organisations

Canberra - Sydney - Melbourne

Phone (free call): 1800 219 969

Or (02) 6198 3361

Email: office@afdo.org.au

Website: www.afdo.org.au

ABN: 25 105 510 898

16 June 2021

Senator the Hon. Anne Ruston,
Minister for Families and Social Services
Minister for Women's Safety
By email

CC: Andrew Seebach, Branch Manager Carer and Payments - DSS

Dear Minister,

RE: Process for the Review of the Impairment Tables - Disability Support Pension

We write to you regarding the recently announced Review of the Impairment Tables by the Department of Social Services for the Disability Support Pension.

The Australian Federation of Disability Organisations welcomes the announced Review and the invitation extended to us by Mr Andrew Seedbach, Branch Manager Carer and Payments, to make a Submission, which we intend to do.

AFDO participates in many engagement mechanisms with Services Australia, including the Civil Society Advisory Group and the Disability Peaks Meeting.

We note that the Department of Social Services has indicated that a major review of the Impairment Tables was conducted in 2011 and that "the Impairment Tables are functioning as expected."¹ It has been ten years since the previous Review, and in that time, much has changed for people disability including understanding and expectations of economic participation and the adoption of the social model of disability as described in the Convention on the Rights of People with Disability and the introduction of the National Disability Insurance Scheme (NDIS).

AFDO and other sector organisations are concerned about the currently limited focus on functionality of the Impairment Tables given the time since the last Review and the changes that have taken place in the lives of people with disability who are DSP recipients or seek to apply to become DSP recipients.

We note, for example, that the Review Discussion Paper only includes data during the period these tables have been in operation. This fails to assess the impact and process of the revised impairment tables, given no comparable data is included before the commencement of the new subordinate legislation.

¹ Department of Social Services: Impairment Tables Review Issues Paper 2021

In 2020, AFDO wrote to Mr Seebach, along with other Welfare and Disability Peaks advising him of expectations regarding the process for the Review of the Impairment Tables. Two key pieces of advice regarding the process for the Review of the Impairment Tables that were consistent from the Sector being:

1. Any consultation process facilitates speaking directly with people with disability as well as seeking engagement from populations particularly affected by the Impairment Tables such as people with psycho-social impairments, people with chronic pain and First Nations Australians with disability.
2. An independent advisory committee guide the process for the Review of the Impairment Tables made up of representatives from the Department of Social Services, people with clinical expertise in the different Impairment Tables, people with disability and lived experience of the DSP and their community representatives.

AFDO and the sector organisations who endorse this letter (shown below) are seeking to discuss the following matters with you in a face to face meeting:

1. The consultation process and how this will directly consult and involve people with disability and affected populations.
2. The need for the Review to be guided by independent advice from:
 - a. Professionals with relevant clinical expertise on the impairments included within the table,
 - b. Lived experience of the DSP Impairment Table assessment processes, and
 - c. Representatives of civil society organisations who directly support and represent people through their DSP application process.

I look forward to discussing this request with your office and establishing an appropriate meeting time for the group,

Kind regards,

Ross Joyce
Chief Executive Officer

For and on behalf of the following Organisations;

