Appendix 2: Summary of key consultation themes on the draft New Zealand Disability Strategy

The Ministry of Disabled People – Whaikaha undertook public consultation on the draft New Zealand Disability Strategy over about 6 weeks between 19 August and 28 September 2025. The Ministry used a range of feedback methods to support participation, including an accessible feedback form, alternate formats, options to provide feedback by email and video, and online and in-person meetings held by the Ministry or led by community groups.

In summary, feedback received through consultation included:

- Around 900 participants who attended a total of 47 online and in-person consultation sessions
- 110 submissions/feedback documents were received via email
- 451 responses were received via an accessible survey and feedback forms.

The survey and submissions provided different insights. Respondents in the survey were asked to rate proposals in the draft Strategy on a 5-point scale, with 1 being strongly disagree and 5 being strongly agree. Respondents also had the option of providing qualitative feedback in the survey or via submissions and in consultation meetings.

Overall themes of feedback on the Strategy

While submitters appreciated the intent and vision of the Strategy, especially its focus on inclusion, equity, and lived experience, many submitters expressed a lack of confidence in the strategy to improve the lives of disabled people, particularly within the 5-year timeframe.

Submitters called for the document to be simpler, and for clearer, measurable actions. Some submitters suggested that the actions in the outcome areas lacked specificity, there was a need to make the goals clearer, and there were too many actions to complete in 5 years.

Some submitters called for more explicit collaboration among government agencies and a governance structure to oversee the progress. Others called for clearer alignment between the Strategy's actions and the recommendations of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and related mechanisms.

Enabling Good Lives was raised as a gap

The strongest theme of feedback was the desire to see the Strategy embrace the Enabling Good Lives (EGL) principles as these were designed by and for the disability community, and emphasise self-determination.

Submitters raised transport, disability support, and equity of supports for different groups as key gaps in the Strategy

Many submitters raised the importance of transport to participation and better outcomes for disabled people and asked for it to be included as a priority outcome area. Transport was also specifically mentioned as a barrier to good outcomes in employment, education and health.

Some submitters, including the Disabled People's Organisations Coalition and the Health and Disability Commissioner, suggested that disability support services (DSS) should be part of the Strategy, and some also asked for the national rollout of an EGL approach to DSS.

Many submissions gave feedback about the inequities in the support that disabled people receive depending on whether the support is funded by ACC, DSS or the health system (long-term chronic health conditions). There was strong support for a unified system where support available does not depend on the type or cause of impairment.

The Strategy should reflect different groups of disabled people, people with higher support needs, and family and carers

Another concern raised was that the draft Strategy does not reflect the diversity of groups within the disability community. A common criticism was that the Strategy does not account for people who require higher levels of support and/or cannot advocate for themselves.

Submitters also recommended that the Strategy should better acknowledge the important role of whānau, carers, and community organisations.

Measurable actions, effective monitoring and clear accountability are critical

Overall, submitters expressed a sense of frustration, scepticism, and urgency. Submitters expressed concern that without measurable indicators and independent oversight, the Strategy risks becoming another well-meaning document with little real-world impact for them.

Submitters suggested that these concerns would be mitigated by providing more specific and measurable actions, indicators and measures at the system level. They also asked how the Strategy will be monitored, and how agencies would be held to account for delivery within the Strategy's timeframes.

Māori and tāngata whaikaha Māori submitters focused on the need for Māori-led solutions and partnering with Māori in implementation, and the importance of whānau at the centre, rather than individuals

Māori submitters supported many of the concerns raised by other submitters and also raised some distinct points. Of submissions received from tāngata whaikaha Māori and Māori people and organisations, high-level overall themes included:

- A desire to see the aspirations of the strategy transformed into meaningful action which respond to the needs of tāngata whaikaha Māori, Māori and their whānau.

- There is some hope in the overarching vision of the strategy, but low trust and confidence that it will be delivered and implemented in five years.

- Tāngata whaikaha Māori and Māori submitters want to see Māori-led solutions prioritised to address inequities – submitters reference the compounding disadvantage that tāngata whaikaha Māori experience, including at the intersections of systemic racism and ableism.

- Tāngata whaikaha Māori and Māori submitters call for increased funding and resourcing to kaupapa Māori services and supports across the priority areas. There is a strong belief in the success of te ao Māori and mātauranga Māori-informed services, information and care.

- There is strong belief that engagement and partnership with Māori (including hapū and iwi) is integral in the development, implementation and monitoring of the strategy, underpinned by Te Tiriti o Waitangi.

- There is too much focus on the individual with the disability in the draft strategy (person-centred). Tāngata whaikaha Māori and Māori submitters wished to see whānau and communities at the centre, including hapū and iwi.

- Tāngata whaikaha Māori submitters echoed concerns from all submitters regarding inequities in supports funded by DSS compared to ACC, with particular concern about the need for whānau navigation roles to support tāngata whaikaha Māori and whānau to navigate complex systems and access services.

- Some submissions also raised concerns about the lack of a specific action plan for tāngata whaikaha Māori.

- Other themes of feedback from tāngata whaikaha Māori and Māori included – the potential of rongoā Māori, the importance of support to access to te ao Māori, and concerns about Māori data sovereignty.

Key themes in feedback from Pacific communities were focused on awareness of what supports are available, culturally centred approaches, and the need to build Pacific provider capacity and capability

Of submissions received from Pacific disabled people and communities, high-level overall themes included:

- Pacific families living with disability operate within their cultural norms, meaning they are less likely to reach out to mainstream services for help. This means that awareness about what supports are available is crucial to those families' wellbeing, and the wellbeing of disabled people within those families.

- Pacific communities can take ownership of what's best for them when interventions and resources are culturally centred, in a way that includes and reflects community voice.

- It is important to create an awareness among mainstream providers of the skills of Pacific providers, and to build Pacific provider capacity and capability, so that services are fit for purpose for Pacific communities.

Vision

The draft Strategy included an overarching vision and principles to set clear expectations about what it aims to achieve, and to guide the work of government and non-government. The Ministry consulted on the following proposed vision: '*New Zealand is an accessible and equitable society for disabled people and their whānau – a place where disabled people thrive, lead, and participate in all aspects of life*'.

Respondents were asked about the vision in the survey and 69% of respondents agreed or strongly agreed that the vision aligns with the values and aspirations of disabled people. However, only 27% agreed or strongly agreed that they were confident that the vision would lead to meaningful change.

While submitters appreciated the intent and vision of the Strategy, especially its focus on inclusion, equity, and lived experience, some considered it lacks direction and does not set clear responsibilities for government and society.

Many submitters called for clearer alignment between the Strategy's actions and the recommendations of the UNCRPD and related mechanisms.

Principles

The draft Strategy proposed 7 principles for public consultation, which outline the key values and commitments that underpin the Strategy: Accessibility, Choice and Control, Equity, Cultural inclusion and intersectionality, Human rights, Participation and inclusion, Respect and dignity, and the Treaty of Waitangi (te Tiriti o Waitangi).

The survey asked people to rate the importance of each principle. There was a high level of support in the survey for the proposed principles but the strongest theme of feedback on the principles was, as discussed earlier, the desire to see the Strategy embrace the EGL principles. The call for inclusion of EGL principles was supported by a range of disability community representative groups and organisations.

There was also feedback regarding:

- the need to hold agencies accountable for the principles;
- the absence of financial support to realise the principles (both funded services and other financial support for disabled people and whānau);
- the absence of principles that reflect the lives of disabled people with higher and more complex needs, and the safety of their carers. Submitters recommended adding a reference to supported decision-making under the Choice and Control principle;
- that the principle of "Equity, cultural inclusion and intersectionality" is jargon and not well understood;
- that the roles of whānau and carers, business, local government, hapū, iwi, and broader society need to be considered in the principles;
- the strategy is individually framed as opposed to considering disabled people in the context of their whānau / family;

- a whole of life approach or beginning early principle should be included;

- accessible language and assistive technology needs to be included in the definition for accessibility; and

- a number of disability groups raised that "control" in the "choice and control" principle can be seen negatively by some members of the disabled community. They recommended the use of "self-determination".

Health

We received 349 responses to the health outcome area in the survey. Overall, there was a high level of support for the goal and success descriptions for health, with at least 84% of survey respondents agreeing or strongly agreeing with each statement.

The quantitative survey results also show strong support for the actions, with each action having at least 88% of respondents either agree or strongly agree.

Disabled people should have as much choice and self-determination as possible relating to how they and their family/supporters make health decisions

Many submissions called for the importance of family/supporters of disabled people in health settings to be explicitly stated in the strategy. Family provide critical supports for many disabled people, especially those with high or complex needs.

Preventative healthcare, rehabilitation and Article 26 of the UNCRPD

A variety of submissions have identified that the Strategy does not cover habilitation and rehabilitation, which are important. Submitters recommended referencing Article 26 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), which covers habilitation and rehabilitation to enable disabled people to maintain maximum independence and ability to participate in all aspects of life.

Linked to this, a few submissions highlighted that programmes targeting prevention, screening, and early detection of health issues should be included.

Transitions from paediatric to adult health supports can be a difficult change

Several submissions described challenges about continuity of care, especially when a young disabled person is interacting with multiple health services. People raised concerns about transitions from paediatric to adult health support, including that there is no navigation or coordination support once young people have moved to adult health services.

The health system is often inaccessible and difficult to navigate, resulting in unmet health needs for disabled people

An overarching theme of feedback on the health outcome area was the challenges in dealing with a system that is often deeply inaccessible (both as a patient and to train and become employed as a health care worker). People highlighted personal challenges in interacting with services that did not meet their access needs.

Many submitters said the system is complex and difficult to navigate. They raised challenges in understanding their entitlements and what services are available in the

health system, and how to access them, noting that the health sector often works in silos.

Submitters also raised ongoing concerns about long waitlists and difficulty accessing diagnoses, and highlighted the importance of timely and early intervention. People noted the impact of long wait times which for some disabled children and disabled people can lead to preventable progression of health conditions, as well as behavioural and mental health challenges.

Include reference to relevant government strategies

Some submitters suggested other government commitments and strategies are specifically referenced in the Disability Strategy. These include the Health of Disabled People Strategy, the Rare Disorders Strategy and the State of Caring in Aotearoa Report.

There needs to be a stronger focus on preventative healthcare as well as accessibility and inclusion in society to support long-term health and wellbeing

Submitters raised the importance of measures to prevent health issues and support early intervention, so that disabled people can have the highest standards of health possible.

Several submitters raised the importance of an accessible built environment and society in supporting long-term health and wellbeing, such as participation in physical activity or involvement in community and cultural events.

Mental health was raised in a number of submissions

Submitters asked for mental health and addiction services to be explicitly included in the health outcome area. Urgent calls were made to reduce barriers, increase service capacity and ensure services are fully accessible to disabled people and their families.

Current health and disability supports are inequitable and there should be a unified system for disabled people

A strong and persistent concern of submitters were health system inequities. People noted health supports are inequitable depending on the region healthcare is provided in.

Many submissions raised the inequities between the health pathways of disabled people supported by ACC, DSS and through long-term chronic conditions. There is strong support for a unified system where type or cause of impairment does not result in inequitable supports.

People raised the importance of access to specific health services, such as stroke support and oral health care

Some submitters sought improvements to specific services, such as:

- Better access to oral health care – noting the need for disabled people, particularly disabled children, to be prioritised for good oral health care as an overall health and preventative measure

- Access to stroke recovery support services, as a major life transition point for people who experience stroke and may have other related ongoing healthcare needs.

Implementation & accountability

Submitters repeatedly raised concerns that the actions are too passive in nature and would not lead to meaningful change. Submitters wanted stronger implementation mechanisms, specific accountability, and higher levels of integration across all services.

Employment

We received 296 survey responses to the employment outcome area. There was strong support for the goal and success description for employment; with each having 85% of respondents agree or strongly agree.

The survey results also show high levels of agreement for the proposed employment actions, with Action 5 (to improve accessibility and inclusion in employment life cycles for disabled people) receiving the strongest support – 91% of respondents either strongly agreed or agreed with this action.

Disabled people should have choice and control about how they participate in the workforce, and the Strategy should consider issues related to material hardship

Feedback underscored that while many disabled people are strongly motivated to work, they should have choice and control in how they participate in the workforce. Employment also may not be the goal for every disabled person, and success looks different for individuals (e.g. working full or part-time or volunteering are all meaningful pathways). Some submitters suggested the Strategy should specifically support volunteering and mentoring as job pathways.

Some submitters questioned the inclusion of employment as an outcome area, given many disabled people cannot work. Many submissions suggested that employment should be replaced with a financial security outcome to cover assistance for people who cannot work. The Human Rights Commission called for a focus on addressing material hardship.

To support disabled people to participate in the workforce, there were suggestions to review the benefit abatement rates so that disabled people who receive benefits are not worse off if they take up work, and better supports and resourcing for disabled people to find and retain employment.

Eliminating discrimination by employers should be a focus

Discrimination against disabled people by employers, and in society, was identified as an entrenched barrier to disabled people's employment, and many submitters called for mechanisms to hold employers to account for discriminatory attitudes or actions.

One suggestion was to develop legislation to set out minimum accessibility standards for employers. Another point raised was that many disabled people lack the knowledge of their legal rights and/or the resources to pursue legal action in a personal grievance process, and that this process takes a long time. This current system also does not support disabled people who face discrimination in the job seeking/pre-employment stage.

Disabled people should be supported to transition into employment

Many submissions, including several disability sector groups, commented that a key gap in the Strategy is support for school-to-work transitions for disabled young people. There were strong calls to support better transitions with suggestions including the addition of actions relating to job placement and better advice and supports for young people. Some submitters also noted that employment support, training and long-term job coaching for disabled young people also acts as respite care for carers and/or parents.

Some submitters also raised the importance of support during other transitions, particularly for disabled people moving from unemployment into employment, as well as re-employment and career change.

The need to change employer perceptions about the cost of employing disabled people

Respondents said that employers seem to perceive providing workplace accommodations for disabled people as burdensome and costly. Some submitters supported the Strategy's actions on educating employers on the benefits of employing disabled people and how to provide appropriate accommodations, and centralising resources and tools for employers and employees to make them more visible and accessible.

Remove employment laws which are a barrier to disabled people's employment

Submitters sought changes to employment conditions they viewed as enabling the exploitation of disabled people, including the 90-day trial period and minimum wage exemption. Several disability sector groups recommended removing the minimum wage exemption, and one submitter said that minimum wage exemptions contradict the Strategy's goal for employment of valuing disabled people equally.

The Government should lead by example in disability employment

Several submissions called for the Government to set standards for creating inclusive and equitable practices in public sector recruitment and procurement. Some submitters recommended the public sector should have targets for recruiting disabled people.

Some submitters also raised concerns about the Public Service Amendment Bill, which will repeal diversity and inclusion provisions from the Public Service Act 2020. They considered that this contradicts the Strategy's goal and was a setback for the employment of disabled people in the public service.

We need to collect better data on the needs and outcomes of disabled employees

Several submitters, including some neurodiversity groups, highlighted the need to ensure we have better information and data on the needs of disabled people in the workplace so employers understand and can support those needs. Submitters also recommended we should track information about the employment outcomes of disabled people to inform government actions. Another submission suggested that major employers should regularly publish disaggregated data on disabled workforce representation, accommodation requests granted, and retention rates.

Transport to work for disabled people is a key barrier

Many individual and group responses identified access to transport as a practical barrier to employment, and that there are particular geographic inequities in employment in regional areas where travel to work is difficult. One submitter added that the prices for public transport and modified vehicles are also barriers.

The needs of specific groups of disabled people, such as neurodivergent people, disabled women, disabled older people who continue to work, and carers who look to re-enter the workforce should be highlighted

Many submissions raised that the employment outcome area does not sufficiently capture disabled people with higher or more complex support needs or recognise the distinct challenges faced by neurodivergent individuals.

Some submissions highlighted that New Zealand has an aging population and increasing numbers of people continuing to work beyond 65 years of age. They considered the Strategy should include disability supports and accommodations for disabled older people who continue working.

Some respondents noted that the ability of carers to work is not addressed, which is problematic for those who wish or need to work.

Many submissions also raised that disabled, Pasifika and Māori women experience higher pay gaps than other groups and this needs to be addressed.

There is a need to improve both the accessibility and consistency of employment services

Some submitters raised that access to government-funded employment services differs between regions, and there are limited or no support options in some areas. They raised that some disabled people have had to relocate if they, or their employers, needed to access specific services.

Another issue raised in several individual and group submissions is the inaccessible process to receive employment support, where many people are required to prove

their disability, and the need to simplify access to physical or financial resources to support workplace adjustments (reasonable accommodations) for disabled people in and looking for employment.

Education

The education outcome area received 317 survey responses. 86% agreed or strongly agreed with the education goal and 80% with the success description. Quantitative survey data showed that a high proportion of respondents agreed or strongly agreed with each of the proposed 9 actions.

Understanding learning outcomes and attendance data

Submitters noted that the education system requires reported learning outcomes, timely interventions and attendance data for every learner in the public education system.

Teachers need support to improve capability, and transition processes are a gap

Submitters commented on the lack of teacher capability to teach disabled learners. There was considerable respondent empathy for teachers and concern they are ill-prepared and under resourced to effectively teach disabled children.

There were many comments that transitions are not included in the draft Strategy. Effective transitions into and out of education as well as transitions between education settings are critical to successful learning outcomes.

Respondents described transitions within the education system as challenging and indicated that while transition should be a regular part of teacher practice, it is an area where there is a lack of knowledge, understanding and implementation skill across the sector. The most difficult transition is recognised as leaving school, where responsibility falls on families.

Boards of Trustees and all education leaders require understanding of disability culture and must be committed to implementation

Many respondents identified that schools are struggling to provide an inclusive education for disabled children and gave examples of practices that exclude disabled children.

People commented on the importance of effective school leadership and the role of the Board in setting expectations and supporting good teaching practice. It is important that Boards understand disability culture and their role, including their obligations under the Education and Training Act 2020.

Many respondents asked for training on disability theory, inclusion and legislative rights to be made mandatory for Boards and senior school leaders.

Māori and Pacific disabled learners face additional barriers and these require specific responses

Respondents commented on the fact that the inequitable outcomes experienced by disabled learners are significantly worse for Māori and Pacific disabled learners. Respondents identify the lack of culturally responsive interventions and low numbers of Māori educators with specialist education training as significant barriers to success for Māori learners.

There is limited availability of many of the supports needed to enable disabled learners to succeed

Many respondents identified systemic barriers to good education outcomes including the need for equity of access, resource, specialist therapy support, skilled teaching, cultural awareness, disability aware leadership, teacher's aide support, and relevant professional development.

Disabled learners need equitable access to specialist support

Respondents noted that disabled learners attending day specialist schools have much greater access to specialist support than disabled learners attending a mainstream school. They requested equitable access to specialists regardless of school setting.

There were concerns that Action 4 enables this ongoing inequity of access.

There is support for making the learning support system less complex and easier for families to navigate

Respondents were keen to see improvements in accessibility, particularly for families navigating a range of systems and processes without a guidance map or support. The ongoing resourcing scheme is frequently mentioned as one of the most complex parts of learning support.

The meaning of action 4 was not clear

Some respondents asked questions about what 'learning support classrooms' referenced in Action 4 meant. Submitters asked whether it meant fewer zoning restrictions, integrated specialist classrooms, or more segregated units.

The perspectives of young disabled learners show they want to be listened to

Young disabled learners said that being happy at school, having friends, learning alongside their classmates, having the appropriate help and the support of the specialist teacher were highly valued.

Some learners wanted close support from an adult, and teacher's aides were very valued while others preferred peer support and would seek adult help as needed. One person said "I need to learn how I learn".

Young disabled learners want to be listened to so they can be known and understood and be actively involved in all decisions that affect them.

Schooling is not working for all disabled learners

For some respondents, negative experiences of the school system has led them to home schooling, Te Kura or Alternative Education enrolment. Some respondents suggest greater investment in an alternative education system for learners who need a different approach to schooling.

Housing

We received 305 survey responses about the housing outcome area. 91% of survey respondents agreed or strongly agreed with the goal and 91% agreed or strongly agreed with the success description for housing, although many noted in comments that the goal and outcomes currently feel out of reach.

Quantitative survey responses also showed a high level of support for all the housing actions, with support for Action 4 on improving housing modifications being the strongest. However, feedback also conveyed a range of concerns with the Strategy and actions as proposed.

There is an urgent need for affordable accessible housing

Submitters highlighted a severe shortage of accessible housing, sharing personal struggles in securing suitable homes in both private and social sectors, such as being unable to leave hospital due to the lack of appropriate housing options.

Many respondents called for more proactive government leadership, financial incentives, and integration of accessibility in early design stages to reduce long-term costs and ease pressure on systems like healthcare.

Submitters also recommended the Strategy include a stronger focus on affordability, with concern that poverty and high housing costs lead to homelessness, overcrowding, and deteriorating health outcomes for disabled people. Submitters pointed to regional disparities (in rural and underserved areas) in support and housing availability.

There should be mandatory requirements for accessible builds

Housing Action 6 - to create voluntary accessibility guidelines for residential dwellings – received the least support among the housing actions.

There was very strong feedback that voluntary guidelines are insufficient to address the shortage of accessible homes. Many submitters called for mandatory minimum accessibility standards in all new builds (aligned with Australia and a growing number of OECD countries), to future-proof housing.

Submitters emphasised that enforceable standards would enable accountability for councils and developers. Some called for government-imposed quotas and targets to ensure housing meets diverse and growing needs. Others expressed concern at the amount of new – particularly medium and higher density – housing which is inherently inaccessible by design.

The Strategy should also focus on the accessibility of social housing

Submitters called for greater emphasis on accessible social housing in the Strategy, particularly as some responsibilities for housing shift from Councils to Community Housing Providers. They emphasised that accessibility must extend to emergency housing and be supported by accessible communities and infrastructure like schools and transport.

There was strong support for improving the housing modification system

Action 4, focused on improving the housing modifications system, received the strongest support in the survey.

Many respondents shared their experiences of how delays and failings in the housing modifications system have adversely affected their lives. Submitters called for broader eligibility for housing modification, faster services, pre-emptive modifications, greater parity between ACC and DSS, and increased funding and flexibility, especially for modifying rental properties.

Safety should be a priority for accessible guidelines

Submitters emphasised that accessibility guidelines must prioritise the safety of disabled people and their whānau, particularly in emergencies given disabled people are at higher risk during natural disasters.

The Strategy should focus on whānau-centred approaches

There was support for prioritising Māori housing initiatives, including iwi and papakāinga developments, and ensuring whānau hauā are central to planning, decision making, and investment.

Some submitters recommended that success should not only be measured through system-level indicators, but also by the lived experiences and outcomes of tāngata whaikaha Māori and whānau.

The Strategy should include support for disabled people who are renting

Submitters highlighted the need for stronger support and protections for disabled people who are renting, noting barriers such as discrimination against disabled renters and restrictive accommodation policies. There was support for helping disabled people transition to home ownership, such as through rent-to-buy schemes.

The system is complex and hard to navigate

Many people shared that they found the housing system overwhelming and difficult to navigate. Submitters shared their experiences of struggling to access adequate – or any – support, lack of disability responsiveness by government agencies, and inaccessibility of information and forms.

The Strategy should encourage choice and control in housing

Many submitters recommended the Strategy include a greater focus on social supports and enabling greater choice and independence for disabled people in a range

of settings, whether living alone, flatting, or in support living arrangements or more formal residential care.

Others recommended the housing outcome should provide more for disabled people with high and/or complex needs and their whānau. There were also calls for a greater focus on the non-physical housing needs of disabled people, such as those who have intellectual, neurodivergent or sensory conditions.

Justice

We received 237 survey responses on the justice outcome area, with 110 from disabled people and tāngata whaikaha Māori. 89% of survey respondents agreed or strongly agreed with the proposed goal and 87% agreed or strongly agreed with the description for success.

There was strong support for all justice actions, with the highest support being for Action 6 (multi-agency responses to family violence). However, qualitative responses raised issues with the scope and framing of some actions.

The justice system is inaccessible and hard to navigate

Many submitters raised concerns about accessibility for disabled people within the justice system, including physical and digital barriers, information access (e.g. communication assistance, NZSL interpreters, use of plain language), and sensory needs. The Ombudsman identified systemic accessibility issues across police, Corrections, and Court settings.

Early intervention and prevention are critical

Many submitters called for a strong focus on prevention and early intervention in the Strategy. They emphasised the need to provide early support for families and whānau caring for disabled family members who exhibit violent behaviours. Submitters felt this is critical to reducing the numbers of disabled young people entering the care and protection and youth justice systems.

There is a need for disaggregated and intersectional data

Pou Tangata, National Iwi Chairs Forum raised that while the Strategy acknowledges gaps and a lack of disability-specific data across justice settings, it does not explicitly set out a commitment to collecting and publishing disaggregated, intersectional data.

A safeguarding framework is urgently needed

There is strong support for a safeguarding framework (Action 1), although some submitters expressed concern that the scope of the proposed action is too narrow.

The Strategy should focus on prevention, rehabilitation and restorative justice

Several submitters felt the Strategy lacks focus on rehabilitation and restorative justice, calling for greater consideration of safer, non-custodial alternatives (such as rehabilitative programmes) that help people understand the factors behind their offending and reduce the risk of reoffending.

The justice sector workforce lacks disability responsiveness

Submitters strongly supported improving disability competence across the justice workforce. Submitters raised concerns such as that their support needs were overlooked in the Corrections system, that the Family Court is seen to prioritise efficiency over the best interests of disabled children, that inadequate Police training can lead to avoidable escalations, and that the credibility of disabled victims of abuse and violence is questioned when they disclose abuse.

Several submitters recommended the Strategy should include a requirement for Deaf cultural competency training to strengthen justice sector workforce disability competency.

There are some key elements missing that require focus

Many submitters recommended improved access to assessment and diagnostic services within the justice system, noting many autistic and neurodivergent people are undiagnosed despite being overrepresented in the justice system. Several submitters raised that the justice sector lacks recognition of undiagnosed disabilities and the need for accessible diagnostic pathways earlier in life to reduce the risk of justice system involvement.

Many also raised concerns that although tāngata whaikaha Māori are referenced, there is no explicit commitment to support Māori-led justice initiatives that uphold tikanga and mana motuhake for tāngata whaikaha Māori.

Several submitters suggested that the Strategy should more explicitly recognise disability-related components of abuse beyond decision-making capacity. Submitters also suggest that the Strategy should more explicitly recognise the importance of supported decision-making.

Several submitters also considered that the justice outcome area lacks recognition of child-to-parent violence and protections for whānau, people in prison with traumatic brain injuries, and healing from violence.

Proposed changes to the justice goal

The Tomo Mai Committee – which is a judicial committee focussed on making courts more inclusive and accessible (the Committee) recommended adding that disabled people should be supported to meaningfully participate in the justice system to the goal.

Changes to the description of success for justice

The Committee recommended replacing "consistently considered" where success measure (c) refers to disabled people's rights and needs, with "respected and upheld", to better reflect justice system obligations. The Ombudsman recommended replacing "considered" with "accommodated". One submitter suggested the success description should include safeguarding all disabled people.

Concerns about the framing of justice actions

Many submitters criticised the use of terms like "consider," "explore," and "develop" for lacking urgency and commitment. Some also raised concerns about conflating justice and safeguarding, recommending they be treated as separate and distinct outcome areas.

Action 4

Many submitters considered Action 4 (review of the Criminal Procedure (Mentally Impaired Persons) Act 2003 (CPMIP)) as already underway, making it seem unnecessary to include in the Strategy. They also called for a review and replacement of the Intellectual Disability (Compulsory Care and Rehabilitation) Act 2003.

Action 5

The caveat "as work programmes allow" in Action 5 was seen as vague, suggesting the action is not a priority.

Action 6

The Committee recommended revising Action 6 (multi-agency responses to family violence) to clarify what is meant by 'future state'.