

28 March 2019

The Hon Paul Fletcher, MP  
Minister for Families and Social Services  
Parliament House  
Canberra  
Australian Capital Territory 2600

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cc: [Sarah.Henderson.MP@aph.gov.au](mailto:Sarah.Henderson.MP@aph.gov.au)

Dear Minister Fletcher,

**Re: Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability – Terms of Reference**

The Royal Australian College of General Practitioners (RACGP) is Australia's largest medical organisation, representing more than 40,000 members who provide more than 154 million general practice services each year to more than 24 million Australians. The RACGP welcomes the comprehensive and far-reaching Terms of Reference for the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability's (Royal Commission's) draft.

The RACGP recommends the Royal Commission's Terms of Reference could be strengthened by having a specific focus on:

1. Assessment of disability

- The assessment of disability under the *Social Security Act 1991*; specifically, the *Social Security (Tables for the Assessment of Work-related Impairment for Disability Support Pension) Determination 2011*
- The use of government-contracted doctors and disability support pension for the assessment of disability with Centrelink.

**Rationale:** The current assessment of disability is lengthy, and genuine applicants often experience long delays in accessing government support.

2. The systems for identifying people with disability and the appropriateness and accessibility of support services

- Evidence based screening systems for the identification of children with disabilities early in life and early intervention services

- Availability of experts in communication skills to work on developing these skills for people with intellectual disability.

**Rationale:** Delays in identifying people with disability and lack of access to appropriate early intervention services can cause more entrenched problems in later life.

3. Appropriate remuneration for people with a disability in the workforce
  - Possible incentives for workplaces that support people with disabilities
  - Protection of financial assets and income of people with a disability from misuse.

**Rationale:** People with disability work in different roles, and bring a range of skills, qualifications, talents and experience to business; therefore, they should be appropriately remunerated. They can also be vulnerable to manipulation.

4. The potential conflicts of interest with non-governmental organisations (NGOs) that both provide services to National Disability Insurance Scheme (NDIS) participants and are support coordinators for the NDIS participants.

**Rationale:** Appropriate governance needs to be in place to ensure participants have genuine choice and resolve issues that arise in service delivery.

5. The importance and need to uphold and remind the community of the United Nation Convention on the Rights of Persons with Disabilities (Convention).

**Rationale:** Australia was one of the first countries to ratify the Convention, and the importance of the Convention's principles must be upheld.

General practitioners (GPs) can contribute positively in the care of people with disabilities. GPs provide long-term holistic care, and will be cognisant of signs of abuse and neglect that a person with disability may experience.

The RACGP welcomes the opportunity to provide further feedback and looks forward to actively participating in the Royal Commission. If you have any further queries please contact Mr Stephan Groombridge, Manager, eHealth and Quality Care on (03) 8669-0544 or at [stephan.groombridge@racgp.org.au](mailto:stephan.groombridge@racgp.org.au)

Yours sincerely



**Dr Harry Nespolon**  
President