

## **Tauākī Pānga: Whakatere Āheinga**

### **He Kupu Whakarāpopototanga**

Ko tēnei tātaritanga e hāngai ana ki ngā itinga i roto i ā mātou ture, kaupapa here hoki, e mea ana kāore mātou i te whakapai ake kia tika ngā āheinga, kia wawe rānei kia tika ngā āheinga e taea ai e ngā tāngata whaikaha te kuhukuhu ōrite ki ētahi atu ki roto i ngā pāpori, ahakoa he mōtika nōna. Ko ngā whakaritenga mohoa noa nei kāore i te eke i roto i te māiatanga o ngā kaupapa here, o te hoahoa pūnaha, o ngā tukunga ratonga e matea ana ki te whakatutuki i te āheinga ki te pāpori e whai wāhi ai ngā tāngata whaikaha (me ētahi atu e pīrangī āheinga) ki ngā papa, ki ngā wāhi, ki ngā rawa, ratonga hoki e matea ana i runga i te ngāwari me te amaru.

Me tomo atu te Kāwanatanga i te mea kāore te pūnaha o nāiane me ōna panonitanga i te eke. Karekau a Aotearoa e whai anga motuhake e tautuhi ai, e ārai ai, e whakakore ai ngā taupā ki ngā āheinga, huri noa i ngā kōpaki kāwanatanga, huri noa i ngā rāngai tūmatanui, tūmataiti hoki, ki te whakaaweawe panonitanga i roto i te pāpori nui tonu.

Ahakoa ētahi painga i roto i ngā tau 20 kua pahure, e mate ana te pūnaha o nāiane ki te whakatika kia pai ngā take āheinga i roto i te wā tika, i te mārāma hoki. Hei tauira, ko ngā taunaki matua a Te Kāhui Tika Tangata mō ngā panonitanga, kāore anō kia whakatinanatia, ā, kāore hoki mātou i whakahoki i ngā karanga kia whakahoungia ngā pae hanga whare (he taunaki nā te Independent Monitoring Mechanism). E kitea tonutia e mātou ngā hē nā te korenga o ngā āheinga:

- he nui rawa ngā hua ngoikore mō ngā tāngata whaikaha i ā ngā tāngata kāore e whaikaha, ā, he nui ake hoki te whakapaunga kaha o ngā tāngata whaikaha ki te whakatutuki i ngā hua ōrite ki ētahi atu (mārakerake ana ki roto i ngā hua katoa, pērā i te mātauranga, whiwhi mahi, whiwhinga moni, whai whare, pāporitanga me te hauora)
- kua waiho noa ki ngā tāngata whaikaha ki te amuamu mehemea ka rongō i te whakatoihara, kāore anō rānei mātou kia eke ki ā mātou pae tutuki – kore kore rawa he kawenga ki te tiaki i raro tonu i te ture
- hinga ana te Karauna ki te whakamana i ngā herenga i raro i Te Tiriti o Waitangi mō ngā tāngata whaikaha
- ngā tauira o ngā āheinga ōhanga, pāpori hoki i mahue, tērā pea ka angitu mehemea he wāhi āheinga a Aotearoa (kia whakaitia te koremahi mō ngā tāngata whaikaha, kia whakaitia hoki te utu mō te koremahi mā te whakaiti i ngā utu toiora me te hāpai i ngā hua ōhanga mā te moni whiwhi mai i ngā tāngata whaikaha me ō rātou whānau).

He momo, he uua tēnei mea te āheinga, ā, ka tū ngā taiapa ki te kuhukuhu ki ngā wāhanga katoa pērā i te hanganga, waka whenua, mōhiohio, ratonga, mātauranga me te hauora. Ko ētahi o ēnei taiapa e whakawhiti kōpaki ana; hei tauira, ko ngā āheinga waka whenua mō te tangata whaikaha ki te toro atu ki tō rātou wāhi mahi (me mātua āhei ana), engari, me huhua te whakaputa o ngā mōhiohio e pā ana ki tērā waka whenua. Ki te whakapaetia ngā āheinga, me aro ki te katoatanga.

### **He RIA tēnei e tāpae ana i tētahi anga hou ki te whakautu i ngā itinga matua o nāiane, ā, kia māia hoki ngā huringa**

He RIA tēnei e tāpae ana i tētahi anga ture hou kia nahanaha te tautuhi, te ārai, te whakakore taupā āheinga ki ngā wāhanga katoa o te oranga. Kotahi atu ki te whakatika i ngā itinga i roto i tā mātou anga ture, kaupapa here hoki, e whakaatuhia ana ināiane te pōturi me te whāiti o ngā panonitanga mō ngā tāngata whaikaha ki te kuhukuhu ki roto pāpori e ōrite ana ki ētahi atu.

## **Regulatory Impact Statement: Accelerating Accessibility**

### **Executive Summary**

This impact analysis is aimed at addressing limitations in our current legal and policy framework that mean we are not improving accessibility to the extent or pace needed to ensure disabled people can participate in society on an equal basis with others, as is their right. Current arrangements are falling short in providing the credible policy, system design, and service delivery needed to achieve an accessible society, where disabled people (and others with access needs) can access the places, spaces, goods and services they need, with ease and dignity.

Government intervention is required because the current system is not delivering a desirable level of change. New Zealand does not have a dedicated framework that can systematically identify, prevent and remove accessibility barriers across government portfolios, across the public and private sector, and influence wider societal change.

Despite some positive improvements over the last 20 years, the current system is not addressing systemic accessibility issues in a timely or comprehensive manner. For example, key recommendations for change by the Human Rights Commission have still not been fully implemented,<sup>1</sup> and we have not acted upon longstanding calls to reform areas such as building standards (an Independent Monitoring Mechanism recommendation).<sup>2</sup> We are still seeing harm caused by a lack of accessibility in:

- disproportionately poorer outcomes for disabled people than non-disabled people, and disabled people having to spend more to achieve the same outcomes as others (persistent gaps can be seen in all outcome areas, including education, employment, income, housing, social participation, and health)
- disabled people being left with the obligation to raise a complaint if discrimination is experienced or what standards we have are not being met – there is no positive duty to provide for reasonable accommodations under the law
- the Crown failing to meet its obligations under Te Tiriti o Waitangi for tāngata whaikaha
- examples of missed economic and social opportunities that could be realised from a more accessible New Zealand (e.g. to reduce unemployment for disabled people, reduce the cost of unemployment through reduced welfare payments, and lift economic benefit through increased revenue from disabled people and their whānau).

Accessibility by its nature is complex and all-encompassing, with barriers to participation occurring in all key areas of life, such as the built environment, transportation, information, services, education and health. Many of these barriers also cross portfolio areas; for example, accessible transport is required for a disabled person to access their place of work (which in turn must be accessible) but information about that transport also needs to be provided in accessible formats. Improving accessibility requires a holistic approach.

### **This RIA is proposing a new framework that can address key limitations in our current settings and provide for enduring change**

This RIA is proposing a new legislative framework to systematically identify, prevent and remove accessibility barriers in all areas of life. It is aimed at addressing limitations in our current legal and policy framework that are resulting in an insufficient pace and extent of change to ensure disabled people can participate in society on an equal basis with others.

Engari, ki te whakatika i tētahi raru whānui, pēnei nei, me huhua ngā whakautu ki te puta he panonitanga. Ko te anga ā-ture e tāpaetia nei e tēnei RIA, ehara i te anga toa e tutuki ai ngā raru āheinga, ā, kia kua hoki e kīia ia 'he rongoa toa'. Ko te ture tētahi whakautu, engari me mōhio hoki ki ētahi atu āhuratanga e hāngai ana, pērā i te mātauranga, whakatairanga, whakangungu, hui katoa ka whai pānga atu ēnei ki te itinga o ngā āheinga. He mea tuatahi te taha ture, ā, tāria te wā ka whakautua ērā atu i te wā heke.

I tirohia e MSD ngā whiringa whakahaere e tutuki ai te wāhi ki ngā kaupapa here me te whakatutuki i ēnei whāinga:

- Whakakōrero i ngā reo o ngā tāngata whaikaha
- Whakapai ake i te hautūtanga, i te pūrongo, i te whakahaere kia ārai, kia aukati hoki i ngā taupā
- Whakarite tikanga kia māia, kia mārama, kia hāngai kia kitea ngā taupā me ngā ara ki te whakakore ināianei tonu nei me te wā heke
- He ngāwari, he kauneke
- Hurihia ngā waiaro ki ngā taupā āheinga mā te whakatupu mātauranga me te mōhiotanga mō ngā āheinga, mō tōna whakahirahiratanga hoki
- Whakauru i Te Tiriti o Waitangi

## **I whakaarotia e mātou ngā whiringa e whā hei whakatika i te raru**

**Whiringa Tuatahi – whakapūmau i te nāianei** – kāore he ture āheinga matua; ka waiho kē mā ngā ture mōtika e whakatika ai te whakatoihara, me ngā whakahaeretanga e rua e pākarukaru ana ki ētahi wāhanga. I tēnei wā, kāore i te tika ngā whakahaere, he rangirua, he tukituki, ā, kāore i te akiaki i ngā whanonga pai. Ko te nuinga o te wā, kāore e whai wāhi ngā tāngata whaikaha, ā, kua roa e karanga ana kia whakarerekēhia.

**Whiringa Tuarua – he hōtaka mahi mātau ka whakaaetia e te Kāhui Minita** – kāore he ture āheinga matua, engari ka whakanui ake i te reretahi mā te whakahau hōtaka mahi i whakaaetia e te Kāhui Minita. He autai tēnei whiringa i runga i ngā paearu pai i te mea ka tere whakatū, ka ngāwari hoki te utu. Engari, ki te pēnei, ka hinga ko te māiatanga, ko te huringa, ko te hautūtanga, ko te pūrongo i te Kāwanatanga me te pono ki ngā panonitanga mō ngā tāngata whaikaha, kāore e tautokohia e rātou.

**Whiringa Tuatoru – he anga ā-ture whakamana** – he ture e whakamārama ana i te hautūtanga, i te hanganga me ngā tukanga mō ngā panonitanga. Ka whakaritea i runga i tētahi tauākī whāinga mārama, he mātāpono, he mahinga, he tūranga me ngā āhuratanga pūrongo, kia taea ai te kī, e tautuhi ana, e ārai ana, e aukati ana ngā taupā i te wā. **Ko tēnei tā mātou whiringa e taunakihia ana.**

**Whiringa Tuawhā – he ture matua** – he whakahaere kē e taea ana te waihanga ture teina mō ngā pūnaha, herenga, ture hoki mō ngā rāngai whai pānga atu ki ngā āheinga. Kua taunga tēnei ara ki ngā wāhi o Kanata, ā, koinei hoki te tino mō te Access Alliance.

## **He aha mātou i pai ai ki te anga ā-ture whakamana**

I ngā aromatawai i ēnei whiringa, he mea tiaki te whakatū anga pēnei kia mārō huri rawa i ngā nohoanga Kāwanatanga, engari, he ngāwaritanga hoki tāna (ka ngaro ki te āta tuhi i te anga), he tukanga hoki ka whakahoungia i roto i te wā.

However, tackling a broad, large-scale problem such as this will require a range of responses to bring about change. The legislative framework proposed by this RIA does not and cannot fix all accessibility problems and should not be seen as a 'cure all'. Legislation is one response, but it should be seen as sitting alongside complementary measures, such as education, awareness raising, and targeted training, that can together address the broader issues resulting from a lack of accessibility. A legislative framework is a logical first step that will enable a range of other responses in future.

MSD looked at both regulatory and non-regulatory options that could effectively deal with the policy problem and meet the following objectives:

- Represent the voices of disabled people
- Enhance leadership, accountability and coordination to prevent and remove barriers
- Provide an enduring, clear and consistent methodology for systematically considering barriers and taking steps to remove them, now and in the future
- Be flexible and progressive
- Change attitudes towards accessibility barriers by building knowledge and awareness about accessibility and why it is important.
- Embed Te Tiriti o Waitangi.

### **We considered four possible options to address the problem**

**Option One - remaining with the status quo** – no dedicated accessibility legislation; instead there is a reliance on rights-based legislation to deal with discrimination, alongside a fragmented landscape of regulatory and non-regulatory measures in certain areas. The current framework lacks coordination, is confusing, inconsistent, and does not encourage good behaviour. All too often it excludes disabled people and there have been longstanding calls for change.

**Option Two - a comprehensive, Cabinet-mandated work programme** – no dedicated accessibility legislation, but increased coordination through a Cabinet mandated work programme. This is a viable option that meets efficiency criteria in that it could be established readily and relatively cheaply. However, this efficiency would come at the expense of having a strong, enduring mandate for change, and appropriate leadership and accountability to hold the Government to account and ensure changes for disabled people, who are unlikely to support it.

**Option Three - an enabling legislative framework** – legislation that sets out leadership, structure and process for change. It would be built around a clear purpose statement, and set out key principles, functions, roles and accountability mechanisms, to ensure that barriers are progressively identified, prevented and removed over time. **This is our recommended option.**

**Option Four - overarching legislation** – a separate regulatory regime that would have the direct ability to establish secondary legislation for codes, standards, and rules for all sectors as they relate to accessibility. This is a common approach in Canadian jurisdictions and is the preferred option of the Access Alliance.<sup>3</sup>

### **Why enabling legislation is our preference**

In assessing these options, we considered a key trade-off is in creating a framework that can endure across Government terms but has sufficient flexibility (which can be lost in an overly prescriptive framework) and mechanisms that can evolve over time.

Ko tā mātou e pai ai, ko te Whiringa Tuatoru, i te mea ka āta whakatau i ngā raruraru o te wā me te whakatutuki i ngā whāinga mō tētahi pūnaha āheinga ka kōkiri ki te āpōpō. Ka āhei te pūnaha ki te tautuhi, ki te whakakore, ki te turaki i ngā taupā e aukati ana i ngā tāngata whaikaha ki te kuhukuhu ki roto i ngā āhuatanga katoa o ō rātou hapori, pāpori hoki. He mahere hoki ki te waihanga, ki te whakatinana hoki i ngā whakaritenga ki te whakatairanga i te whakaurunga o ngā tāngata whaikaha me ētahi atu e matea āheinga ana. He rerekē te Whiringa Tuarua, ā, ki tā mātou whiringa he kaha te tohu, te whakahau hoki mō ngā panonitanga kia ū i roto i ngā nohoanga kāwanatanga. Ka taea te whakakanohitanga me te rangatiratanga o ngā tāngata whaikaha me te whakamaui i ngā tūhonotanga me ngā pūrongorongo i waenga i te kāwanatanga.

Ko te Whiringa Tuawhā te hiahia o te Access Alliance, engari ki a mātou, ko te kawenga whakahaere mō te waihanga pae āheinga kāore e tutuki pai i ngā taupā āheinga, i te mea ko ētahi o ēnei taupā kuhukuhu kei ngā wāhi, kei ngā kōpaki rānei kāore e tau ki ngā whakahau. Kua kitea hoki tēnei huarahi ki tawāhi, kāore e eke ngā hua.

### **Ko te tauria hautūtanga māia tētahi mea whakahirahira mō te angitu**

Ko te tauria hautūtanga māia e here ana i te arotahi kia tika, kia mātua hoki te rongotanga i te reo o ngā tāngata whaikaha me ō rātou whāmere, whānau hoki hei kaiārahi, kaitohutohu, tautōhito oranga, ki ngā mana whakahaere, tae noa ki te mātai i ngā mahi a te kāwanatanga. Engari, me taurite ēnei me te whakahau me ngā tūhonohonotanga ki te mahi tahi huri i te rāngai tūmatanui ki te āta whiriwhiri i ngā taupā āheinga, kei tau te haepapa ki te umanga kotahi.

Ko te tauria hautūtanga angitu me whai mana, whai kaha hoki ki te whiriwhiri i ngā taupā āheinga whirinaki e whakawhiti kōpaki ana, me te whiriwhiri tika hoki i te hunga whaipānga e mahi ana (pērā i ngā hinonga karauna, i ngā kāwanatanga ā-kāinga) me ngā puringa ki te whakaputa i te huringa, kei tawhiti pāmamao i te rāngai tūmatanui.

Ko te kawenga o te hautūtanga ka pā ki ngā whakahaeretanga me ngā pūrongorongo ki te whakarato i te pūnaha. E whā ngā pou i roto i te tauria hautūtanga māia. He whānui ēnei mai i te waengapū kāwanatanga ki te tū motuhake, ā, e whai ake nei:

- **Whiringa Tuatoru (A): He umanga kāwanatanga**
- **Whiringa Tuatoru (B): He mana whakahaere motuhake i whakaaetia e te Kāhui Minita**
- **Whiringa Tuatoru (C): He hanganga pāhekoheko**
- **Whiringa Tuatoru (D): He Hinonga Karauna Motuhake mō te Āheinga**

I whakamātauhia ēnei tauria ki ngā paearu matua mehemea e taea ana e ēnei te:

- takoha kia tū māia te pou ki te whakaterere āheinga
- waha ngā reo o ngā tāngata whaikaha
- wero atu te kāwanatanga e pā ana ki ngā whāinga pae tawhiti
- āwhina ngā kaiwhakatau ki te mārāma pū ki ngā utu, ki ngā tūraru penihana, ki ngā piki, heke o ngā kaupapa here
- kōkiri ake ngā mahinga mō te āheinga, mō te mahi tahi me ngā Minita me ngā rāngai tūmatanui, tūmataiti hoki.

### **Ko te tauria māia rawa, ko te tauria e tuari ana i ngā haepapa ki waenga i ngā tāngata whaikaha, te ratonga tūmatanui me te Kāwanatanga**

Ko tā mātou tauria e whakaahua ana i tētahi whare hautūtanga hou me te āta whakataurite i te motuhaketanga me te mahi tahi ki te kāwanatanga.

He kōwhiringa tēnei e tū motuhake ana mā tētahi Mana Whakahaere e whakahaeretia ana e ngā tāngata whaikaha, me te tuku tohutohu motuhake, mōhiohio hoki i runga i ngā taupā e aukati ana i ngā tāngata whaikaha ki te whakatutuki i ō rātou mōtika ki te kuhukuhu pāpori.

Our preferred option is Option Three, as it can deal effectively with the problem at hand and meet objectives by creating a system that sets the future direction for accessibility. It will enable the systematic and progressive identification, prevention and removal of barriers preventing disabled people from fully participating in all aspects of their community and society. It also provides a framework for developing and implementing clear approaches to promote the participation of disabled people and others with accessibility needs. Unlike Option Two, it sends a strong signal and mandate for change and can endure across government terms. It provides for appropriate representation and ownership by disabled people, while retaining the connections and accountability within government. Option Four is the preference of the Access Alliance, however, our view is that a fully regulated approach structured around the development of accessibility standards is not going to be appropriate to address accessibility barriers, as many participation barriers are in areas or portfolios that do not lend themselves well to prescription. This approach has also not been shown to be effective overseas in delivering results.

### **An effective leadership model is critical for success**

An effective leadership model requires a focus on ensuring the effective, ongoing primacy of voice of disabled people, and their family and whānau, as leaders, advisors, lived experience experts, in formal governance, and in holding government to account. However, this needs to be balanced with the mandate and connections to work constructively across and within the public sector to effectively address accessibility barriers and prevent responsibility becoming siloed in one agency.

A successful leadership model needs the mandate and ability to address intersecting accessibility barriers that cross portfolios, while dealing effectively with a range of stakeholders with competing interests (e.g. state-owned enterprises, local government), and varying levers to create change further the distance from the core public sector.

The approach to leadership will impact where functions and accountability for delivering the system sit. There are four structural options for an effective leadership model . These range from in-government options, to fully independent, as follows:

- **Option Three (A): Central government agency**
- **Option Three (B): Cabinet-mandated independent governance board**
- **Option Three (C): Semi-structural integration**
- **Option Three (D): Independent Crown Entity for Accessibility**

We assessed these models against key criteria of whether they can:

- contribute to creating an enduring architecture to accelerate accessibility.
- represent the voices of disabled people.
- hold government to account for progress towards long term objectives.
- help decision makers to fully understand the costs, benefits risks, and trade-offs of policy approaches.
- drive better coordinated action around accessibility, working constructively with Ministers, the public sector and the private sector.

### **The most effective model is one that shares responsibility between disabled people, the public service and Government**

Our preferred model creates a new leadership structure and carefully balances a level of independence with still being able to work constructively with government.

This option provides independence through an independent Governance Board, led by disabled people, and focused on providing independent advice and information on the barriers that prevent disabled people from realising their right to full participation in society.

Hei tēnei wā hoki, ka āta mātai i ā te kāwanatanga whakautu, tūhono anō hoki mā te Tumu Whakarae me te Minita ake. E taea ana e tētahi whakahaere kotahi huri i te kāwanatanga me ngā tikanga mō te taupā āheinga i te wā, ka tautuhi, ka whakakore, ka ārai. He huringa aroturuki, arotake hoki ka whakahaeretia e taea ana e te Poari te whakahoki kōrero e ahu pēhea ana te tū a ngā kaupapa here hou, o te nāianei hoki, ā, ka whakatupuria te pūnaha i roto i te wā.

Ko te anga ā-ture e tāpae nei, kāore e whakahuahua i ā te tangata mahi, kore mahi rānei. Engaringari, he tāpae kē i ā te kāwanatanga whāinga, ahunga kaupapa here me ngā whakaarotau mō te panonitanga, i roto tonu i ngā tukanga mārama, i te mana whakahaere hoki ki te whakatutuki i ngā mahi.

### **He utu ki te whakapai ake i ngā āheinga**

He utu, ināia tonu nei ki te whakatū pūnaha hou, me ngā utu hoki i roto i te wā ki ētahi rāngai i ā ngā taupā āheinga e whakaea ana. He uaua i tēnei wā kia mārama ki ngā utu katoa nā te mea, hui katoa, he whānui, he whāroa. Heoi, he hua ka puta i roto i te wā ki ngā rōpū huhua, pērā ki ngā tāngata whaikaha me ngā whānau, ki ētahi atu e matea āheinga ana, ā, haere ake nei, ki ngā pakihi hoki ka pakari ake me te mārama ki ngā whiwhinga ōhanga i roto i ngā mahinga āheinga. E whakapae ana ko ngā hua ka puta ka whai painga atu anō i ngā utu, engari kāore pea e pēnei ana mō tēnā tōpūtanga, mō tēnā tōpūtanga i roto i ētahi rāngai. Ko te whānui o ēnei utu kāore i te mōhiotia, ā, ka piki, ka heke rānei i runga i te whakataunga. Ko ngā mahi ki te turaki taupā kuhukuhu ka ea i te wā, ā, ka whakamahia hoki ngā taputapu, ngā puringa mō te aromatawai i ngā penihana, tūraru me ngā utu (pērā i te kēhi pakihi, RIA, CBA, whakataunga Kāhui Minita, whiringa hokohoko). He kōwhiringa mā tēnei kāwanatanga me ngā kāwanatanga e heke mai nei, me te mōhio anō hoki he iti ngā tautoko mō ngā tāngata whaikaha ki te waha i ngā utu e tutuki ai ngā hua ōrite o te tangata kāore e whaikaha ana.

### **He whakaaro kotahi nō te hunga whaipānga, engari kāore e kore ka tukituki ngā whakaaro**

E whakaae ana te hunga whaipānga ki te mate mohoa noa nei me ngā āhuetanga e pēnei ai. Engari, kāore anō kia āta wānanga kia mārama kehokeho ki ō ngā hunga whaipānga whakaaro, pērā i ngā whakaaro o ngā kaumātua, o ngā kaitiaki, o ngā Māori me te hapori pakihi, ki te whiringa e tāpae ana. Kua whakaritea tēnei mō te wāhanga mahi e whai ake nei, mō te titiro ki te whakatinanatanga o te pūnaha, ā, ka kōrero hoki ki ngā tāngata whenua, hapū, iwi me Māori me pēhea e whakatinana i Te Tiriti o Waitangi (Te Tiriti) i roto i te pūnaha hou, ā, ki hea hoki whakakaha ake ai.

Kāore e kore ka tukituki ngā whakaaro huri noa i te hunga whaipānga. Hei tauira, ko tā Access Alliance tū, kia whakatinanahia katoatia te whakahaerenga e waihangā ana i ngā pae āheinga ki roto i ngā rāngai katoa. Hei tauaro, he hunga whaipānga i roto i ngā pakihi iti, rāngai rōpū hapori rānei e āwangawanga ana ki te pitomata ka nui ake ngā whakahaere me ngā utu herenga e whai pānga ana ki ngā whiringa katoa.

At the same time, it can ensure government is responsive and connected through a responsible chief executive and Minister. It provides for collective coordination across government and a clear methodology to ensure accessibility barriers are, over time, systemically identified, removed and prevented. A cycle of monitoring and review will be provided for, so the Board can provide feedback on how well new and existing policies are performing, and the system can grow and develop over time.

The legislation framework recommended will not set out what people can and cannot do. Rather, it sets out the government's goals, policy direction, and expectations for change, with a clear process and governance to make that happen.

### **There are costs to improving accessibility**

There will be costs, both immediate in establishing a new system, but also flow-on costs over time in particular sectors, as barriers are progressively addressed. It is difficult at present to be clear about all costs, because accessibility in its totality is vast and all-encompassing. However, there will be benefits that accrue over time to a number of parties, including disabled people and whānau, others with access needs, and also, given time, to groups such as businesses that may be better positioned to realise the potential economic benefits of accessible practices. We are assuming that overall benefits outweigh the costs, but this may not be the case for individual organisations within particular sectors. The extent of these costs is unknown and will vary depending on the proposed solution .

Work to address participation barriers will need to be progressively realised and utilise existing tools and levers for assessing benefits, risks, and costs (e.g. business cases, RIAs, CBA, Cabinet decisions, procurement checks). There will be choices to be made by this and future governments on the extent to which costs should be met by government, disabled people, or other parties, noting that disabled people currently receive limited support in meeting the costs involved in reaching the same outcomes as non-disabled.

### **Stakeholders have a shared view on the problem, but views are likely to diverge on the solution**

Stakeholders have a shared view that there is a problem with the status quo and agree on the underlying causes. However, we are yet to undertake the level of engagement required for a clear view on what different stakeholders, including seniors, carers, Māori and the business community, think of the solution proposed. This is planned as part of the next stage of work that will look at implementation of the system, and will include consultation with tāngata whenua, hapū, iwi and Māori on how to give effect to Te Tiriti o Waitangi (Te Tiriti) in a new system, and where this should be reinforced.

It is likely there will be significant divergence of opinion across the full range of stakeholders involved. For instance, the Access Alliance favours a fully regulated approach structured around the development of accessibility standards in all sectors. On the other hand, there may be some stakeholders in the small business or community organisation sectors, that have concerns about the potential for increased regulation and associated compliance costs that would be inherent in any option.