



PARENTS OF VISION IMPAIRED (NZ) INC

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Providing a community to support parents of children with vision impairments

18 August 2025

Committee Secretariat
Governance and Administration Committee
Parliament Buildings
Wellington

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Tēnā koe,

Please find attached a submission from Parents of Vision Impaired NZ on the *Public Service Amendment Bill*.

We would like to speak to this submission.

Ngā mihi,

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ABOUT PARENTS OF VISION IMPAIRED NZ

Parents of Vision Impaired NZ (PVI) is a registered charity which supports parents who have blind, low vision, or vision-impaired children. There is no cost to enrol, and we provide a supportive community for parents who are overcoming challenges every day. We offer parents advice, information, and opportunities to meet other parents. We publish a quarterly newsletter (eVision) and have a members-only Facebook page for families and whānau to share information and to network. PVI also runs an annual conference which allows parents and whānau to get together face to face for a longer time to talk, listen and learn in a social setting. PVI takes an active part in the disability sector through making sure that the voice of visually impaired children and their parents is heard in consultations with government, schools, local councils, and other organisations.

ABOUT THE BILL

This bill amends the Public Service Act 2020 to drive improvements in public service performance, create more stability, and ensure that the public service efficiently and effectively delivers value for money.

PVI'S APPROACH

PVI takes a whole of life approach with the understanding that disabled children and whānau should have a say about outcomes that affect them. In doing so, we draw on key components of the following:

New Zealand Bill of Rights Act (1990). This Act states that everyone has the right to be free from discrimination from government and state officials, including with regards to education and on the grounds of disability.

Aotearoa New Zealand is a signatory to several United Nations conventions. As such, governments are required to undertake all appropriate legislative, administrative, and other measures for the implementation of the rights as recognized in the following relevant conventions:

- **United Nations Convention on the Rights of Persons with Disabilities (UNCRPD):**
- **United Nations Convention on the Rights of the Child (UNCRC).**

NZ Disability Strategy (2016-2026)ⁱ is the Government's primary vehicle for implementing the UNCRPD and includes the NZ Disability Action Planⁱⁱ.

Enabling Good Lives Principlesⁱⁱⁱ. These were developed in conjunction with disabled people and families. EGL is a foundation and framework to guide positive change for disabled people, families, communities and governance structures. The **eight principles** are:

- *Self-determination:* Disabled people are in control of their lives.
- *Beginning early:* Invest early in families and whānau to support them; to be aspirational for their disabled child; to build community and natural supports; and to support disabled children to become independent, rather than waiting for a crisis before support is available.
- *Person-centred:* Disabled people have supports that are tailored to their individual needs and goals, and that take a whole life approach rather than being split across programmes.
- *Ordinary life outcomes:* Disabled people are supported to live an everyday life in everyday places; and are regarded as citizens with opportunities for learning, employment, having a home and family, and social participation - like others at similar stages of life.
- *Mainstream first:* Disabled people are supported to access mainstream services before specialist disability services.
- *Mana enhancing:* The abilities and contributions of disabled people and their families are recognised and respected.
- *Easy to use:* Disabled people have supports that are simple to use and flexible.
- *Relationship building:* Supports build and strengthen relationships between disabled people, their whānau and community.

OUR SUBMISSION

While we acknowledge the importance of improving public service efficiency and accountability, we are concerned that several amendments may **adversely impact disabled people and their families** if not addressed.

OUR CONCERNS

Equity, Inclusion, and Participation

The Public Service Amendment Bill 2025 proposes removing explicit references to diversity, equity, and inclusion from the Public Service Act 2020, asserting that these obligations are covered by other legislation. While these principles still exist in laws such as the Human Rights Act and Equal Pay Act, their removal from the central Act risks reducing the visibility and prioritisation of disability issues across agencies^{iv}.

Disabled people and their families face reduced assurance that accessibility, reasonable accommodations, and inclusive practice will be embedded across public services. The narrowed purpose statement focuses on supporting government policy, delivering efficient services, meeting New Zealanders' needs, and acting lawfully, while removing references to "active citizenship" and the "long-term public interest." This shift moves towards marginalising disabled communities in decision-making processes, reduces the commitment to co-design, and narrows opportunities for meaningful participation^v.

Efficiency, Performance, and Delegation

The Bill emphasises value for money and efficiency, which, while important, could disproportionately affect specialist or tailored supports relied on by disabled people and families. Services that are complex, person-centred, or resource-intensive – notably, disability supports, communications, and accessibility – become harder to justify under a narrow efficiency framework^{vi}. The Bill also expands delegation powers for chief executives, allowing them to assign responsibilities to contractors' employees. Increased reliance on contracted providers leads to inconsistent service provision and patchy quality. It also weakens direct accountability for accessibility and disability rights obligations, making it harder for families to ensure safe, equitable, and responsive public services^{vii}.

Accountability, Leadership, and Digital Accessibility

The Bill introduces mechanisms for annual misconduct reporting and regular long-term insights briefings, which could improve transparency in service delivery, including disability-related services. However, these briefings are controlled by central government, meaning disabled voices may not be centred, included or even prioritised in determining topics or outcomes. Strengthened leadership roles across finance, digital, and HR functions have potential to improve consistency across agencies, but without explicit mandates for accessibility and universal design, digital exclusion and workplace barriers may persist^{viii}. Mandatory accessibility standards are critical to ensure vision-impaired users can access online services and information fully^{ix}.

Emergency Planning and Inclusion

Amendments to civil defence and business continuity provisions could enhance protections for disabled people during emergencies, a group historically at greater risk^x. However, without explicit reference to disability-inclusive emergency planning, disabled people and their families could once again be overlooked during crises^{xi}. Ensuring that emergency planning is inclusive, and that disabled communities have input into priorities, is essential to safeguard their rights and well-being.

THE BILL AND THE UNCRPD

Relevant UNCRPD articles:

- *Article 3: Principles of participation, inclusion, equality* – Establishes the fundamental principles guiding all CRPD implementation, ensuring that disabled people are treated equally, included in society, and actively participate in decisions affecting their lives.
- *Article 4: Obligations of States to protect and promote rights* – Requires States to adopt legislation, policies, and measures to guarantee the human rights of disabled people and to eliminate discrimination in all areas of life.
- *Article 19: Living independently and being included in the community* – Affirms the right of disabled people to live independently, choose their place of residence, and access community services and support to fully participate in society.
- *Article 29: Participation in political and public life* – Ensures disabled people can take part in political and public activities, including voting, holding office, and engaging in civic decision-making on an equal basis with others.
- *Article 31: Statistics and data collection for monitoring rights* – Obligates States to collect accurate data and statistics on disabled people to monitor the implementation of rights and inform evidence-based policies and programs.

The proposed Bill upholds aspects of transparency and accountability (annual reporting on misconduct, long-term insights briefings) and could support better monitoring and data-informed policy (Article 31).

The proposed Bill does **not** uphold Articles 3, 29. The removal of explicit equity, diversity, and inclusion commitments weakens the public service's obligation to actively promote non-discrimination and participation, including against people with disabilities.

The proposed Bill does **not** uphold Articles 3, 19. The narrowed purpose statement and efficiency focus works to undermine citizen participation and co-design of services.

The proposed Bill does **not** uphold Articles 4, 19. Delegation to contractors without explicit accountability for accessibility and disability reduces effective rights protection.

THE BILL AND THE NZ DISABILITY STRATEGY:

The Strategy's vision is for New Zealand to be a **non-disabling society**. Key goals include upholding disabled people's human rights, participation in society, and achieving positive outcomes. The refreshed strategy includes employment as a key outcome, with a goal of providing employment opportunities for disabled people. The proposed Bill upholds strengthened leadership structures and reporting mechanisms could indirectly support better oversight of service delivery.

The proposed Bill does **not** uphold equity and inclusion, weakening public services and removing accountability for actively embedding the Strategy (including the refreshed strategy). Efficiency-driven mandates place pressure services to cut or streamline supports, meaning that participation and quality outcomes for disabled people are often the first to go. The extremely limited references to engagement with disabled people risk failing the emphasis on co-design and user voice.

THE BILL AND ENABLING GOOD LIVES PRINCIPLES:

Relevant EGL Principles:

- *Self-determination*: Disabled people make choices about their lives.
- *Person-centred approaches*: Tailored supports, not "one-size-fits-all."

- *Easy to use*: Disabled people have supports that are simple to use and flexible.
- *Relationship building*: Supports build and strengthen relationships between disabled people, their whānau and community.

The Bill's reporting and insight mechanisms could provide opportunities for data to inform better, person-centred services.

The Bill does not uphold / risks undermining self-determination: Efficiency and cost-focused framing may conflict with choice and tailored supports, undermining self-determination. Delegation to contractors without clear inclusion standards weakens person-centred delivery. Narrowed public service purpose and removal of inclusion references reduces opportunities for co-design and engagement necessary for designing services that are easy to use and relationship building practice.

By failing to integrate these frameworks, the Bill risks reversing decades of progress toward inclusive, responsive governance. Embedding the NZ Disability Strategy and EGL principles into the Bill is essential to honour New Zealand's legal and ethical obligations toward disabled people.

RECOMMENDATIONS

PVI recommends the following changes or safeguards in the Bill:

- Restore explicit references to diversity, equity, and inclusion in the Public Service Act, with specific attention to disability rights and accessibility.
- Include an explicit requirement for meaningful consultation with disabled people and families in policy development and service design.
- Mandate accessible digital services and communication across all public service agencies.
- Ensure that efficiency and performance frameworks do not undermine the quality or availability of specialist services for disabled people.
- Embed inclusive emergency planning obligations for disabled people in civil defence and continuity planning.
- Strengthen accountability for contracted services, ensuring all providers meet accessibility and inclusion standards.

FINAL COMMENTS

Parents of Vision Impaired urges the Government to ensure that the Public Service Amendment Bill strengthens rather than weakens the public service's role in supporting disabled people and families. Policies and services must be inclusive, accountable, and accessible, so all New Zealanders, including those with vision impairments, can participate fully in society.

Any reforms must prioritise inclusion, accessibility, and adequately funded local decision-making to protect the rights and wellbeing of disabled New Zealanders.

ENDNOTES

ⁱ Office for Disability Issues. *New Zealand Disability Strategy*. Accessed from: <https://www.odi.govt.nz/nz-disability-strategy/>

ⁱⁱ See <https://www.odi.govt.nz/disability-action-plan-2/>

ⁱⁱⁱ See <https://www.enablinggoodlives.co.nz/about-egl/egl-approach/principles/>

^{iv} Albom, S., & Grayman, J. H. (2025). A Comparative Analysis of Disability Policies in Aotearoa New Zealand and the United Kingdom Through the Lens of the Capability Approach. *Journal of Human Development and Capabilities*, 26(3), 1–20. Retrieved from <https://www.tandfonline.com/doi/full/10.1080/19452829.2025.2502023>

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- ^v Human Rights Commission. (2023). Report finds disabled people among those who experience persistent disadvantage. Retrieved from <https://www.whaikaha.govt.nz/news/news/report-finds-disabled-people-among-those-who-experience-persistent-disadvantage>
- ^{vi} MacNeill, P. J. (2023). Employment opportunities for disabled people in the New Zealand disability sector. Retrieved from <https://mro.massey.ac.nz/bitstreams/a5e84480-e122-45f6-88a4-cf528816dadd/download>
- ^{vii} Smith, M., Blamires, J., & Click, M. F. (2022). The Impact of Policies and Legislation on the Structure and Delivery of Support Services for Children with Cerebral Palsy and Their Families in Aotearoa New Zealand. *Nursing Praxis in New Zealand*, 38(1), 1–10. Retrieved from <https://www.nursingpraxis.org/article/38925-the-impact-of-policies-and-legislation-on-the-structure-and-delivery-of-support-services-for-children-with-cerebral-palsy-and-their-families-in-aotearoa>
- ^{viii} New Zealand Government Digital Services. (2025). Accessibility and GenAI. Retrieved from <https://www.digital.govt.nz/standards-and-guidance/technology-and-architecture/artificial-intelligence/responsible-ai-guidance-for-the-public-service-genai/customer-experience/accessibility>
- ^{ix} Blind Low Vision NZ Accessibility Guidelines. Retrieved from <https://blindlowvision.org.nz/resources/accessibility-guidelines/>
- ^x Civil Defence Emergency Management. (2013). Including People with Disabilities. Retrieved from <https://www.civildefence.govt.nz/assets/Uploads/documents/publications/guidelines/information-series/13/13-disabilities/is-13-13-including-people-with-disabilities.pdf>
- ^{xi} Bay of Plenty Civil Defence Emergency Management Group. (2015). Disaster Preparedness for People with Disabilities. Retrieved from <https://www.bopcivildefence.govt.nz/media/1168/disaster-preparedness-for-people-with-disabilities.pdf>