

12/06/2026

Committee Secretariat  
Social Services and Community Committee  
Parliament Buildings  
Wellington

## **Submission: Disability Support Services Bill**

Tēnā koe

Age Concern New Zealand (ACNZ) welcomes the opportunity to provide feedback on the *Disability Support Services Bill*.

Age Concern New Zealand has strong interest in this Bill as it seeks to outline the purpose and operation of Disability Support Services into the future. As an organisation that promotes the value, dignity and rights of older New Zealanders we are concerned about the potential impact for people with disabilities and older carers.

Some older people have lived throughout their life with a disability, while others develop a disability later in life. Typically, increasing age comes with growing rates of disability and health need in the over 65 age group. Forty-six percent have mobility problems, 28% agility problems, 11% have sight issues and 10% have trouble remembering. <sup>1</sup>

Among over 75-year-olds, 21% have ischemic heart disease, 11% have diabetes, 52% have arthritis and 15% have a mood or anxiety disorder. Most older people that receive home and community support services are over 75, with 50% of the over 85 group living at home receiving home and community support.

Aotearoa New Zealand has an increasing number of older people, with the number of people aged 65+ expected to increase to 1.2 million within the next decade. <sup>2</sup> This has implications for health and social policies, including disability support services.

Older New Zealanders may have a family carer while others are themselves the carer supporting a family member. Some have cared for a disabled child into adulthood and are anxious about what who will care for their disabled loved one when they are unable to do so

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<sup>1</sup> [https://www.tewhātuora.govt.nz/assets/Publications/Health-status-reports/HNZ-TWO-Health-Status-Report\\_FULL.pdf](https://www.tewhātuora.govt.nz/assets/Publications/Health-status-reports/HNZ-TWO-Health-Status-Report_FULL.pdf)

<sup>2</sup> <https://www.officeforseniors.govt.nz/better-later-life-strategy>

any longer. Older carers have provided a valuable service to their family and community for which they deserve respect and acknowledgement and tangible support.

Age Concern New Zealand wants to see all people with disabilities and their carers, including those aged 65+, receiving the disability support services they need, so they can live independent, healthy and connected lives.

Our feedback on the *Disability Support Services Bill* is based on insights from our mahi with New Zealanders aged 65 and above. It is also informed by research data and our participation in sector partnerships.

## About Age Concern New Zealand

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Age Concern New Zealand is a trusted charity working in local communities throughout Aotearoa New Zealand to support older people, their friends and whānau. We have 28 local Age Concerns operating in 38 locations throughout the country and a national office based in Wellington.

Our strategic goal is:

*Every older person feels connected, has positive choices and can age well.*

Our values of Dignity. Wellbeing. Equity and Respect for older people are our guiding lights and underpin everything we do.

Our core services include advocacy and public awareness, social connection, health promotion, elder abuse and neglect prevention, and providing support through expert information, advice and referrals.

We are active and vocal on relevant issues and work to ensure older people stay connected with their family, friends and community. We inform government and other national bodies on issues of concern for older people.

Local Age Concerns are the first port of call for older people living in their community, providing a range of services and social activities to meet their needs.

## Our Comments

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1. We support the development of a legislative framework for the provision of disability support services to improve transparency, consistency, fairness and sustainability. Developing a workable and effective framework can only be achieved if a fair and inclusive approach is used where government works alongside those with a disability, the wider disability sector, iwi Māori, health and social services and communities.

2. The Disability Support Services Bill has been introduced hastily and with tight timeframes for submissions. We are particularly concerned as the Regulatory Impact Statement for the Bill states clearly that there was no consultation prior to the bill being introduced. We are concerned about the speed at which this significant Bill has been introduced and processed.
3. We do not support provisions in the Bill for the Minister to create Ministerial programmes and Ministerial directions thus creating secondary legislation. There are risks around oversight of these programmes and directions, and the scope is too broad and undefined. These provisions will create uncertainty for disabled people and their families/whānau as programmes and directions can be made without further consultation.
4. We are concerned that there is no mention of the United Nations Convention on the Rights of Persons with Disabilities in the Bill, yet New Zealand is a signatory to this convention which outlines the country's obligations to disabled people.
5. The Bill makes no mention of Te Tiriti o Waitangi which requires proactive government engagement with Māori, which has not occurred in preparing this new legislation.
6. The Enabling Good Lives approach and principles were collaboratively developed and are widely embraced by the disability sector, yet it is not mentioned in the Disability Support Services Bill. We would like to see it referenced as it supports a social model and perspective on disability.
7. The Bill emphasises the responsibilities of family carers but is not as clear in its assurances that disability support services will be available to the disabled person and their carer into the future. Parts 1 and 2 in the Disability Support Services Bill appear to signal that the family of disabled people may need to exhaust their own resources before any disability support may be provided - if not immediately, then in the future. We are concerned that the definitions of a family member and the decision criteria for eligibility do not address the risks and assumptions around family functioning, relationships and economic abuse patterns, especially elder abuse. The decision criteria will allow income-based and asset-based assessments - significant change that would pose a risk to well-being. Consultation on the decision criteria requires more transparency and sufficient time for comment.

## Our Recommendations

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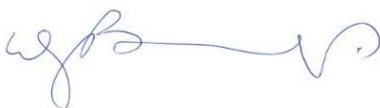
1. The Disability Support Services Bill is not passed as it currently stands. Substantive amendments need to be made before it becomes law.
2. The Disability Support Services Bill needs to reference and align with several key documents to ensure equity, wellbeing and participation for disabled people, tāngata whaikaha Māori and their families/whānau:
  - a. The United Nations Convention on the Rights of Persons with Disabilities
  - b. The Enabling Good Lives vision, approach and principles.
  - c. Te Tiriti o Waitangi
3. The removal of clauses that allow the Minister to create Ministerial programmes and Ministerial directions as secondary legislation. These provisions give the Minister wide-ranging powers that bypass consultation processes.
4. Strengthen recognition, support and protection for family carers (including older carers) in the Bill and ensure they will have the on-going tangible support they need such as access to respite, financial support and well-being programmes and resources.
5. The removal of clauses that open the door to introducing means testing as eligibility for Disability Support Services in the future.

## Closing Comment

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Thank you again for the opportunity to provide feedback on the *Disability Support Services Bill*. We look forward to hearing the outcome of the consultation process and working alongside the sector to ensure people with disabilities can live their best lives.

Nāku noa, nā,



Karen Billings-Jensen  
Chief Executive  
Age Concern New Zealand