



# Report

**Date:** 28 February 2020

**Security Level:** IN CONFIDENCE

**To:** Hon Carmel Sepuloni, Minister for Disability Issues

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## Paper One: Accelerating Accessibility Cover Report

### Purpose of the report

- 1 This report, the first in a series of four, provides an overview of our work on the potential approaches to accelerating accessibility, and seeks agreement to the timing to progress a legislative framework (if this is your preferred option), key concepts for the framework, and whether and how to set targets for accessibility.
- 2 This report should be read in conjunction with the three attached papers which provide more detail on the following areas:
  - Paper Two: Accelerating accessibility - Problem, objectives and system framework
  - Paper Three: Accelerating accessibility – Domains and standards
  - Paper Four: Accelerating accessibility - Institutional arrangements

### Executive summary

- 3 In December 2018, Cabinet agreed to commence the design of an approach to achieve a fully accessible New Zealand, in collaboration with key stakeholders [CAB-18-MIN-0591].
- 4 Stakeholders in particular disabled people have called for more to be done to improve accessibility in New Zealand, so they can fully enjoy their rights and participate in society on an equal basis as others. Accessibility also brings broader social and economic benefits to New Zealand society.
- 5 We have considered several options to accelerate accessibility in New Zealand (refer to paper two for more detail of these options):
  - Cabinet mandated accessibility work programme
  - review and amend existing legislation related to accessibility
  - a new legislative framework.
- 6 Reviewing and amending all legislation related to accessibility is the least preferred option as it would be a lengthy process that could potentially stall in the future.
- 7 While a Cabinet mandated programme would achieve most of the objectives and benefits of a legislative option, on balance our preferred approach is a new legislative accessibility framework because it sends a strong signal about the value of and commitment to accessibility, gives more certainty over the long term, and provides for compliance and enforcement mechanisms.
- 8 The new legislative accessibility framework would provide for a policy work programme, awareness raising and training, establishment of advisory councils to make recommendations in areas of accessibility (from developing new standards or review of existing laws to operational and process change) and establishes provisions

to allow for the creation of regulatory systems for areas of accessibility where none exist (papers two provides more detail on the proposed framework and paper three provides more detail on standards development).

- 9 The preferred approach provides the flexibility to implement a progressive approach over-time so that Governments can set priorities to resource accessibility measures. However, this flexibility does trade-off against the prescription and certainty of a more detailed framework and relies on continual approval and investment by future Governments. This risk could be mitigated by cross-House consultation.
- 10 The flexibility gives obligated parties the time to develop, understand and adopt efficient or innovative approaches to meeting regulatory obligations. International jurisdiction experience show that a highly prescriptive and detailed approach has stretched beyond the ability of obligated parties to implement and comply with the legislation and diverted attention from improvements and progress to compliance and cost.
- 11 Cabinet requested that we develop a common understanding of the concept of accessibility. We propose that the concept of accessibility (in line with the concept under the Convention on the Rights of Persons with Disabilities (CRPD)) is set out in legislation and describes accessibility as the prevention and removal of barriers, so disabled people can independently access public spaces, built environments, goods, products or services they need to fully participate and be included in society. Accessibility would be further defined in the context of accessibility standards, e.g. what does an accessible bus look like.
- 12 Another key concept important to the framework we explored was what group/s the framework should focus on. We propose that the framework's focus is disabled people with the definition of disability in alignment with the CRPD, acknowledging that explicit in this, is that accessibility will bring benefits to a range of other groups, e.g. older people and people with children.
- 13 Accessibility domains are a key element within a proposed accessibility framework for New Zealand. We propose any framework includes domains in line with the CRPD.
- 14 Discussions with stakeholders have raised questions on whether and how to set accessibility targets within the framework. Our preferred approach would be to provide for review periods of the accessibility framework in legislation. A lack of data on accessibility makes it difficult to set meaningful targets at this stage. Access Alliance's preference is to set targets in legislation but understand the difficulty of doing so at this stage. As a middle ground they have advised that they would be happy for review periods of the accessibility framework to be set in legislation.
- 15 If Cabinet agreed to the proposal for a new legislative accessibility framework, it is feasible to introduce legislation by the end of 2020 and would meet stakeholder expectations, but this brings risk.
- 16 It is not feasible to have in place the institutional arrangements to implement and administer the framework by the end of 2020 as further work is needed to finalise the form of and funding for these arrangements. Successful implementation and administration of the framework to accelerate accessibility is dependent on the level of resource available to support the institutional arrangements and delivering core components such as awareness raising.
- 17 Alternatively, an in-principle agreement to the accessibility framework could be sought from Cabinet in April 2020. This would allow time to report back in more detail on institutional arrangements and funding to provide more assurances for implementation and administration of the framework. A delay in the drafting and introduction of the accessibility legislation will not meet Access Alliance expectations for timing but they have expressed that are committed to ensuring the proposal is successful as it can be.
- 18 Accelerating accessibility in New Zealand is a significant and complex task as accessibility touches all New Zealand society. As such, accelerating accessibility will

need to be progressively realised and over time there will likely be significant costs government, the private sector and potentially civil society.

- 19 The costs will include costs to Government to implement and administer the proposed framework, including funding required to establish and operate the institutional arrangements and the advisory councils' processes and compliance costs for obligated parties in the public and private sectors. As an indication of cost, the 2017 budget estimates for the Accessibility Directorate that administers the Accessibility for Ontarians with Disabilities Act (AODA) was NZ\$16m. Further work is needed to establish costs in New Zealand.
- 20 Costs to accelerate accessibility need to be balanced with the full participation of disabled people and others with accessibility needs, and the social and economic benefits full participation brings to New Zealand society.
- 21 If you want to proceed with seeking agreement to draft and introduce legislation by the end 2020, we recommend consultation with key Ministers ahead of circulating a draft Cabinet paper.

## Recommended actions

It is recommended that you:

- 1 **Note** that in December 2018, Cabinet agreed to commence the design of an approach to achieve a fully accessible New Zealand, in collaboration with key stakeholders
- 2 **Note** that Ministry of Social Development officials considered several options to accelerate accessibility in New Zealand including:
  - Cabinet mandated accessibility work programme
  - review and amend existing legislation related to accessibility
  - a new legislative framework
- 3 **Note** that Ministry of Social Development officials' preferred option is new legislative accessibility framework that provides for a policy work programme, awareness raising and training, establishment of advisory councils to make recommendations in areas of accessibility (from new standards or review of existing to operational and process change) and establishes provisions to create regulatory system for areas of accessibility where none exist
- 4 **Note** that Ministry of Social Development officials were asked to develop a common understanding of the concept of accessibility
- 5 **Agree** that any proposed framework will set accessibility as a high-level concept with a focus on the prevention and removal of barriers for disabled people and accessibility will be further defined in the context of accessibility standards  
**Agree/Disagree**
- 6 **Agree** that any proposed accessibility framework will focus on disabled people, acknowledging that explicit in this, is accessibility will bring benefits to a range of other groups, particularly older people  
**Agree/Disagree**
- 7 **Note** that discussions with stakeholders have raised questions on whether and how to set accessibility targets within the framework and Ministry of Social Development

officials' preference is to provide for review periods of the accessibility framework in legislation

8 **Agree** to provide for review periods in any accessibility framework

**Agree/Disagree**

9 **Note** that it is feasible to introduce accessibility legislation by the end of 2020, but it is not feasible to have in place the institutional arrangements that are critical to the success of the implementation and administration of the proposed accessibility framework

10 **Note** that introducing legislation ahead of institutional arrangements risks successful implementation and administration of the proposed accessibility framework

11 **Note** that a delay in introducing legislation by the end of 2020 will not meet Access Alliance's expectations but they have noted with Ministry of Social Development officials that they are committed to ensuring success of the proposal

12 **Note** that an in-principle agreement to the accessibility framework could be sought from Cabinet in April 2020 to allow time to report back in more detail on institutional arrangements and funding

13 **Agree** to seek Cabinet agreement to a proposed framework with advice on institutional arrangements to be developed simultaneously with drafting of legislation (if legislation is the preferred option)

**Agree/Disagree**

or

14 **Agree** to seek an in-principle Cabinet agreement to a proposed framework and report back on the detail and funding for the institutional arrangements at a later date

**Agree/Disagree**

15 **Note** that there will likely be significant costs over-time to accelerate accessibility across government, the private sector and civil society but these costs need to be balanced with the social and economic benefits of full participation in society by disabled people and others with accessibility needs

  
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Julia Bergman  
General Manager  
Disability, Seniors and International Policy

28/02/2020  
Date

  
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Hon Carmel Sepuloni  
Minister for Disability Issues

1/03/2020  
Date

## Background

- 22 Under the Disability Action Plan 2019-2023, the Ministry of Social Development has responsibility for the action to accelerate accessibility. In December 2018, Cabinet agreed to commence the design of an approach to achieve a fully accessible New Zealand, in collaboration with key stakeholders. The design was to include developing a common understanding of what “fully accessible” looks like and exploring the feasibility of using legislation to provide for standards and codes for accessibility [CAB-18-MIN-0591 refers].
- 23 In July 2019, Cabinet noted your oral report back on progress of the work programme, which indicated support from stakeholders for a legislative mechanism. This report back noted that you would report further in April 2020 and that towards this the Ministry of Social Development (MSD), in partnership with the Access Alliance, would work to agree domains of accessibility; examine how other jurisdictions have approached legislating to mandate accessibility and identify the range of possible options for change, that can be a mix of legislative and other approaches.
- 24 In addition to the Access Alliance partnership, MSD officials have consulted with a range of government agencies<sup>1</sup> and organisations such as the DPO Coalition, the independent legal team funded by the New Zealand Law Foundation and the Whānau Ora Interface Group, on options to accelerate accessibility.

### Accessibility is a pre-condition to realising human rights

- 25 Article 9 of the CRPD clearly enshrines accessibility as the precondition for disabled people to live independently, participate fully and equally in society, and have unrestricted enjoyment of all their human rights and fundamental freedoms on an equal basis with others.
- 26 Accessibility also brings economic benefits to wider society, for example participation in employment by disabled people supports the New Zealand economy and research shows that leading companies who recognise the needs of diverse populations through accessible and universal design outperform their competitors and new markets open to them. It has been estimated that the disposable income of the 1 billion disabled people globally is US\$8 trillion.<sup>2</sup>
- 27 But disabled people experience multiple obstacles to full participation in society because information, products and services are not always accessible. While accessibility has benefits reaching beyond disabled people, e.g. older people and people with children<sup>3</sup>, disabled people experience barriers to accessibility others can take for granted. More efforts to remove and prevent barriers whether in the built environment, transport or other areas is something disabled people have consistently

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<sup>1</sup> Department of Prime Minister and Cabinet, the Treasury, State Services Commission, Ministry of Business Innovation and Employment (Standards NZ), Department of Internal Affairs, Climate Change Commission, Office for Disability Issues, Office for Seniors, Ministry of Justice, Human Rights Commission.

<sup>2</sup> Return on Disability, 2016 Annual Report: The Global Economics of Disability, The Return on Disability Group.

<sup>3</sup> For example, curb cuts and power-assisted doors also benefits a parent pushing a child in a stroller.

called for to ensure their full participation on an equal basis as others. Refer to paper two for further detail on the problem definition.

### **Accelerating accessibility is a significant and complex task**

- 28 In New Zealand, accessibility issues are interconnecting and cross many agencies and sectors. Each agency and sector have varying roles and responsibilities and varying levels of responsiveness and progress toward accessibility. This has resulted in a fragmented regulatory system and a lack of co-ordination and leadership across accessibility, making for slow progress, limited systemic change, ad-hoc and inconsistent information, advice and responses to accessibility (paper two provides more detail on the problem and issues outlined below).
- 29 More is needed to improve the collection of accessibility data to inform systemic change and priorities, set meaningful accessibility targets and track progress toward accessibility. While data is collected in some areas by agencies it is insufficient to inform, accelerate and track change in the system. The recent, National Local Authority Accessibility Survey conducted by the Office for Disability Issues [REP/20/1/009 refers] suggests there is room for improvement in the collection and use of accessibility data across local authorities in New Zealand.
- 30 Additionally, compliance mechanisms are individual based and do not help to understand what is happening at a system level and exemptions, loopholes and limited compliance and enforcement mechanisms do not incentivise or compel accessibility measures. The lack of incentives or compulsion in the system means individuals and organisations can opt out or not prioritise accessibility.
- 31 For individuals and organisations who want to be accessible, the issues outlined above create confusion and a lack of awareness and knowledge of practical measures that can be taken. The National Local Authority Accessibility Survey indicated that local authorities have a high interest and need for more guidance from central government [REP/20/1/009 refers].
- 32 Ultimately, it means disabled people and others with accessibility needs cannot always access the information, goods and services they need to fully participate in society on an equal basis as others.

### **We have considered several options to accelerate accessibility**

- 33 We have explored international jurisdictions; approaches to accessibility, including Canada, Australia, and the United Kingdom. This exploration has demonstrated that an off-the-shelf solution will not achieve accelerated accessibility in New Zealand. Countries such as Canada who have had provincial accessibility legislation in place since 2005 and federal legislation since 2019, still have a way to go and continue to learn about what works for accessibility.
- 34 We have considered several options to accelerate accessibility in New Zealand (refer to paper two for more detail of these options):
  - Cabinet mandated accessibility work programme
  - review and amend existing legislation related to accessibility
  - a new legislative framework.
- 35 We have ruled out the option to review and amend existing legislation as it would be a lengthy process that could potentially stall in the future.
- 36 While a Cabinet mandated programme would achieve most of the objectives and benefits of a legislative option, on balance our preferred approach is a new legislative accessibility framework because it:

- sends a stronger signal than a Cabinet mandate to disabled people and wider society that accessibility is valued and not a nice to have
  - provides the certainty and longevity needed to accelerate accessibility over the long term
  - provides for a regulatory system, including compliance and enforcement measures (cannot be done via Cabinet mandate) where none currently exists for specific domains of accessibility, e.g. website standards.
- 37 The new legislative accessibility framework would establish a policy programme and enable the establishment of regulatory systems for areas of accessibility where none currently exist. More specifically the proposed framework would provide for:
- awareness and training to support individuals and organisations to accelerate accessibility
  - standard development within accessibility domains, this would include the review of existing or creation of new standards and codes
  - Ministerial appointed advisory councils to develop recommendations for accelerating accessibility in specific domains, e.g. transport or the built environment
  - reporting and monitoring mechanisms to measure progress of the system and where change is needed
  - compliance and enforcement mechanisms to ensure compliance with the legislation.
- 38 Paper two and the attached A3 provides detail of how the framework would work.
- 39 Paper three provides more detail on standards and domains. Our preferred approach to domains is a mixed approach that specifies a few domains at the outset, for example domains in line with accessibility domains in the CRPD, with flexibility to designate and prioritise further domains as progress is made.
- 40 If Cabinet agreed to the proposal for a new legislative accessibility framework, it is feasible to introduce legislation by the end of 2020 and would meet stakeholder expectations, but this brings risk.
- 41 It is not feasible to have in place the institutional arrangements to implement and administer the framework by the end of 2020 as further work is needed to finalise the form of and funding for these arrangements. Successful implementation and administration of the framework to accelerate accessibility is dependent on the level of resource available to support the institutional arrangements and delivering core components such as awareness raising.
- 42 If legislation was to be introduced by the end of 2020, work on the institutional arrangements would run in parallel to drafting of the Bill (paper four provides further detail).
- 43 Alternatively, an in-principle agreement to the accessibility framework could be sought from Cabinet in April 2020. This would allow time to report back in more detail on institutional arrangements and funding. This approach would provide more certainty around costs and funding and assurances for implementation and administration of the proposed accessibility framework. A delay in the drafting and introduction of the accessibility legislation will not meet Access Alliance expectations.

*We propose to state full accessibility as a concept in the accessibility framework*

- 44 The Ontario experience has highlighted the importance of individuals and organisations understanding what is meant by accessibility, so they can apply it in a

practical and tangible way to ensure their products, services or spaces can be accessed and used. Criticisms<sup>4</sup> of the Accessibility for Ontarians with Disabilities (AODA) have been that individuals and organisations struggle with these basic concepts making it difficult to make progress.

- 45 When looking across other jurisdictions for definitions of accessibility, we found varying definitions. But in common across all definitions was that accessibility is about the prevention and removal of barriers and designing products, services, devices and environments in a way they can be independently reached, entered or used; easy to obtain or use; and easily understood. This understanding is in line with the CRPD.
- 46 The stakeholder consultation undertaken in 2019, found that accessibility means different things to different people, depending on their sector and their personal experience. We also consider accessibility to be an ever-evolving concept, i.e. as changes in society occur so will accessibility needs and requirements for individuals. All of this makes it difficult to define what fully accessible is in a way that meets the understanding and experiences of all, and in way that captures it overtime.
- 47 We propose accessibility is stated as a concept about the prevention and removal of barriers, so people can independently access public spaces, built environments, goods, products or services they need to fully participate and be included in society. This then allows accessibility to be described in context within specific standards. We see more value and practical application in defining accessibility in the context of domains of accessibility, e.g. what does accessibility look like for buses or houses.

*We propose that the accessibility programme of work focuses on disabled people*

- 48 Acknowledging that explicit in this, is that accessibility will bring benefits to a range of other groups, e.g. older people and people with children. For the definition of disability, we propose that any definition should be in line with the CRPD meaning, i.e. disability is an evolving concept and includes people who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

*Consideration is needed on if and how accessibility targets and goals are set*

- 49 Some stakeholders have told us they would like to see deadlines for accessibility set in legislation or as an aspirational policy goal. Others consider that targets should be set on a domain by domain basis.
- 50 In Ontario, the setting of a deadline in legislation has created unrealistic expectations that have been difficult to meet, e.g. Ontario is a long way off the 2025 legislative deadline for accessibility. There has also been criticism that Ontario has gone too fast too soon which has created confusion for obligated parties about accessibility and has not allowed the time for them to understand and implement their responsibilities<sup>5</sup>. Similar issues have arisen in Manitoba and Nova-Scotia. Standards are developed at a pace of one and half to two years, so it can take up to 10 years to have five standards in place.

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<sup>4</sup> Listening to the Ontarians with Disabilities, Report of the Third Review of the Accessibility for Ontarians with Disabilities Act, 2005, The Honourable David C. Onley, Reviewer, January 2019.

<sup>5</sup> Listening to the Ontarians with Disabilities, Report of the Third Review of the Accessibility for Ontarians with Disabilities Act, 2005, The Honourable David C. Onley, Reviewer, January 2019.



- 51 Due to the issues experienced by other jurisdictions in setting unachievable legislative targets and the limited accessibility data and information in New Zealand, we consider it is not feasible or practical to set meaningful targets for accessibility at this stage.
- 52 Access Alliance's preference is to set targets in legislation but understand the difficulty of doing so at this stage. As a middle ground they would be happy for review periods of the accessibility framework to be set in legislation.
- 53 To this end, our preferred approach would be to provide for in legislation review periods of the accessibility system with the purpose being understand how well the system is working (paper four provides more detail on monitoring and reporting). We can provide further advice on the timing of the reviews if you wish to take this approach.

### **Accelerating accessibility will require long-term commitment and there will be costs**

- 54 Accessibility touches all areas of society and cannot be achieved all at once in the short term. As an example of the need to take a progressive approach over the longer term, paper three discusses the time taken in other jurisdictions to develop standards has been up to five years. However, in the short term there are some practical and tangible steps that can be taken, including introducing a legislative framework to build the momentum to accelerate accessibility.
- 55 There will be costs for Government to implement and administer the proposed framework, including funding required to establish and operate the institutional arrangements and the advisory councils' processes and costs over-time to implement any agreed recommendations. Over-time there would also be costs to local government, the private sector and businesses, and potentially civil society.
- 56 At this stage we are not able to provide certainty of detailed costs of the potential changes and recommendations that may be proposed by the advisory councils in specific domains. These costs will not be known until the relevant advisory council has developed their proposals, as this a collaborative process and depends on phasing.
- 57 Ontario Canada does provide some information on cost. The budget estimates for 2017 for the Accessibility Directorate that administers the Accessibility for Ontarians with Disabilities Act (AODA) is \$CA15.1m (NZ\$16m). Further work is needed to establish costs in New Zealand.
- 58 Costs of accessibility need to be balanced with the economic, fiscal and social benefits costs of doing nothing, e.g. participation of disabled people in the labour market, disabled people tell others about accessible businesses and do not return to those who are not, and we know designing for accessibility in the first instance is more cost-effective in the long run.
- 59 In the short term, we could consider piloting the process for advisory councils to develop recommendations. We have had initial discussions with the Ministry of Business, Innovation and Employment and there is potential to use the Better Rules – Better Outcomes approach to pilot a small area within a domain, this would include testing the approach to developing recommendations and identifying costs. The Better Rules–Better Outcomes approach involves a multidisciplinary team, containing experts in policy, legal, business rules, drafting, and service design working together to develop policies and rules.

## There are risks and trade-offs to be considered

- 60 You asked us to provide advice on the possibility of introducing legislation by the end of 2020. By necessity this means the introduction of a more prescriptive and detailed legislation is not feasible. This flexibility does trade-off against the prescription and certainty of a more detailed framework and relies on continual approval and investment by future Governments.
- 61 There may also be a risk that the flexibility of the framework does not provide the "teeth" to accelerate accessibility and does not meet expectations of some stakeholders. In any case on balance, and in the context of what we have learnt from international jurisdictions, we consider a more flexible approach is preferable.
- 62 Flexibility in the system will allow for a progressive approach over-time so that governments can set priorities to resource accessibility priorities and measures. It gives obligated parties the time to understand and adopt efficient or innovative approaches to meeting regulatory obligations. It also allows the ability to adapt to changes in society (e.g. technology).
- 63 International jurisdictions, like Ontario and the United Kingdom, have been criticised for going too far, too quickly, with very prescriptive and numerous standards across a range of areas, stretching beyond the ability of business to implement and comply. Attention has been diverted away from improvements in accessibility and towards compliance processes (in Ontario in particular) and the associated costs<sup>6</sup>.
- 64 Developing the institutional arrangements and seeking funding via Budget 2021 alongside the drafting process, creates the risk that if these arrangements do not receive enough (or any) funding then implementation of the framework will be compromised, and the pace of acceleration slowed. The level to which the institutional arrangements are resourced will be congruent to the speed of implementation of the framework and pace of accelerated accessibility.
- 65 The risks associated with the proposed accessibility framework could be mitigated to some degree through cross-House consultation and through seeking an in-principle agreement to the proposal, pending a report back on institutional arrangements and funding.

## Next steps

- 66 Discuss the four accelerating accessibility reports with Ministry of Social Development officials at the Disability Issues Agency meeting on 2 March 2020.
- 67 You are meeting with the Access Alliance on Thursday 5 March 2020. The Access Alliance have provided feedback on the proposal and they are generally supportive of the approach. The key issue they will likely raise with you is about the timing on introduction of legislation, if there is agreement to the proposal.
- 68 The Parliamentary Counsel Office has indicated it will need four to six months to draft a new bill. This timing means the earliest the draft bill could be introduced is the end of 2020.

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<sup>6</sup> Disability and legislation outcomes. A review of the social and economic impact of disability and accessibility legislation in New Zealand and selected jurisdictions. NZIER report to the Blind Foundation of New Zealand, December 2017

69 The timing for any drafting and introduction will also depend on decisions on which option to proceed with. Following a discussion with you on Monday 2 March on the options to accelerate accessibility in New Zealand, we will prepare a Cabinet paper and Regulatory Impact Analysis, if required, for your April 2020 report back to the Social Wellbeing Committee accordingly.

70 The following table provides an indicative timeframe to proceed to Cabinet in April 2020:

Task	Timeframe
Drafting of Cabinet paper	3-27 March
Departmental consultation	30 March-3 April
Ministerial consultation (and cross-party consultation if required)	6-17 April
Submit SWC paper	23 April 2020
SWC Committee	29 April 2020

71 As referred to above, you may also wish to engage with key Ministerial colleagues ahead of formal Cabinet paper consultation.

72 The Department of Prime Minister and Cabinet, Treasury, State Services Commission, the Ministry of Justice, Human Rights Commission, Department of Internal Affairs, Ministry of Business, Innovation and Employment, Office for Seniors and Office for Disability Issues have been consulted on these reports.

73 In the preparation of the Cabinet paper MSD officials will also consult with the Ministries of Health and Education, Department of Conservation and other agencies as relevant.

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# Recommended framework to accelerate accessibility

DRAFT – NOT GOVERNMENT POLICY

This proposed framework is guided by the following principles (identified in international jurisdictions):

- Progressive realisation
- Flexibility and future-proofing
- Universality
- Inclusiveness and capacity building
- Transparency, consistency and equity
- Ease of use



