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**Submission to DSS:
Review of the National Disability Advocacy Framework
July 2015**

About Clickability

Clickability is an Australian disability service directory that features ratings and reviews from the people who actually use the services.

Clickability was founded and is staffed by workers and consumers from the disability community.

For us, it's simple. Everyone deserves consumer rights. That's why we are working towards a **vision** of equality in consumer choice and control within disability support services. Our **mission** is to bring established techniques of promoting consumer choice and control into the disability sector.

We have written this submission because our work directly impacts and is impacted by advocacy in the disability industry, and it's important to us to be part of the conversation.

For more information, visit us at clickability.com.au or contact us at info@clickability.com.au

Jenna & Aviva



1. Do you believe the current Framework encompasses your vision of advocacy in the NDIS environment? If not, what changes are required?

Where the old Framework refers frequently to both human and citizenship rights, we see consumer rights as equally valuable under NDIS. We see a central role of advocacy in this new environment as developing a strong marketplace, which is responsive, equitable and transparent. Advocacy services should assist people with disability (PwD) and those who support them to become savvy consumers of both disability-specialised and mainstream services, a powerful means of self-advocacy and self- and community-safeguarding.

We see the following as integral to advocacy services under NDIS, and suggest they be reflected in the Framework:

- Well-funded, independently funded advocacy services
 - o This may include support for capacity-building within the advocacy organisations
 - o Potential for creative opportunities, collaborations and partnerships to fund advocacy
 - o Careful ethical and practical consideration of fee-for-service models of advocacy
 - o While independent, services must work closely in and around systems
- Clarity around the legal framework/s by which PwD will be protected, and clarity around the pathways to access these
- Promoting a risk-tolerant culture
 - o Stringent safeguarding and quality assurance have the potential to create a poorly-functioning market and in turn, a system which is just as disabling as previous block funding models
 - o Dignity of risk is important to both capacity-building and leadership
- Research, underpinned by emancipatory research principles, to support evidence-based practice in
 - o Supported decision-making
 - o Meeting informational needs
 - o Identifying and addressing service gaps
- Information
 - o Clear, simple and appropriate points of information about advocacy, decision-making and complaint resolution
 - o Clarity around whose responsibility it is to create and maintain this information
- Diversity
 - o In the range and roles of advocacy including systemic, group and individual
 - o Respecting this developing environment may contain some voices which are louder than others, and once again drawing on emancipatory research principles to ensure diversity is represented in group and systemic advocacy settings

2. Are the principles of the Framework appropriate for guiding the delivery of advocacy for people with disability in a changing disability environment, including in the context of the NDIS? If not, what changes are required?

While the Principles are still relevant, we encourage PwD's consumer role to be highlighted, including principles of emancipatory research and co-creation in the marketplace within the scope of strategic alliances. We also suggest that actions around ensuring privacy and confidentiality be reviewed in light of the new culture of competition that is emerging.

3. Are the outcomes of the Framework still relevant or should different ones be included? If so, what should be included?

While the Outcomes are still relevant, we encourage PwD's consumer role to be highlighted, including an outcome of consumer literacy. There should be clear accountability for PwD knowing their responsibilities, their rights and how to enforce them, and being aware of legal frameworks that exist to support them.

4. Are the outputs of the Framework still relevant or should different outputs be included?

We suggest adding an output of “Disability advocacy, individual and systemic, that promotes education around consumer rights, responsibilities, and processes.” As PwD are introduced to a new level of consumer rights, so too are they are to accountability and self-responsibility. While this change occurs, more supports are needed to provide the literacy that people need to become informed and savvy consumers, and must be made explicit within the Framework’s outputs.

We also feel that systemic advocacy services should also concern themselves with mainstream marketplace accessibility, and as such, we suggest updating the output, “Disability advocacy that promotes community education and awareness of disability issues and rights” to reflect this.

Lastly, we have a concern that the NDIS might further isolate the delivery of disability services from other important sectors, diluting responsibility for multi-faceted issues experienced by PwD. We believe that the delivery of advocacy in “a coordinated manner” should explicitly include supporting communication between disability, health, housing, transport and other government and non-government services, and that this should be reflected in the outputs.

5. Does the Framework identify what is needed in the current and future disability environment? If not, what changes are required?

For PwD to realise the Framework’s vision, advocacy within NDIS should focus on increasing the quality and transparency of the marketplace, and simultaneously the capacity of the mainstream community to be culturally and socially accessible to PwD.

We believe the Framework should highlight the points at which advocacy is likely to be required along the process of a person entering and continuing the NDIS process; for example

- Prior to and/or post initial assessment with the NDIA
- At the six month mark alongside participating service providers
- Prior to and/or post one-year assessment with the NDIA
- On recognition of a problem between two stakeholders that can’t be easily resolved
- For carers at the same points

Additionally, we think in the context of NDIS, the Framework should encourage proactivity of advocacy services to actively seek out PwD who are isolated.

6. Do you have any other comments, thoughts or ideas about the Framework?

The Framework needs to demonstrate the relevance, scope and role of advocacy within a world of personalised services in order to continue to work towards promoting accessibility through cultural change at an individual, systemic and social level. A key part of this will be the production of relevant, reliable information, with which we hope to assist.