



Submission to the Department of Social Services (DSS) on  
the Review of the National Disability Advocacy Framework, (the Framework)

Thank you for the opportunity to provide a submission for the review of the DSS's Framework. The following is the result of the team work of DAN's Framework sub-committee with the endorsement of the Board of Management.

The Disability Advocacy Network Inc (DAN) is based in Wagga Wagga and is funded solely by DSS (no State Government funding since its inception in 1992), to provide only the Individual model of advocacy. DAN provides support, information, advocacy, and consumer training for people who have a disability, their families and carers in the Riverina & Murray, South West Slopes, Southern Tablelands, and Central Murrumbidgee regions. (Major towns include Wagga Wagga, Griffith, Leeton, Narrandera, West Wyalong, Temora, Young, Tumut and Cootamundra).

DAN's responses to the consultation questions are as follows:

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

DAN believes that the current Framework reflects the rationale of disability advocacy work. However, our vision of disability advocacy under the NDIS environment is that everybody with a disability, with or without an NDIS package, will receive advocacy support FREE of charge and quite independent of the NDIS. DAN believes that this should be stated under the principles of advocacy. DAN also believes that future advocacy funding must reflect the advocacy levels required under the new Framework.

**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?**

No. Although the principles of the Framework are appropriate for guiding the delivery of advocacy for people with disability in a changing disability environment, they do not go far enough.

The following matters must also be addressed:

- The face-to-face delivery of advocacy service.
- Independent and free from any conflict of interest delivery of advocacy service. It should thus be funded outside of the National Disability Insurance Scheme, to ensure its complete independence.

- The provision of advocacy service for people with disabilities who are not eligible for participation in the NDIS

Although the Framework document provides that advocacy should be free of conflict of interest, our submission is that advocacy service should be a stand-alone service and not part of a larger service provider such as Mission Australia or Intereach (examples only). Advocacy provision for people with disabilities must not be allowed to be subsumed by larger organisations whose primary considerations are the provision of general disability services to people who are recipients under the NDIS.

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

Yes, all the outcomes of the Framework are still relevant, however, we believe that they should also include: 'People with disability are to be offered self - advocacy training based on an individual's needs and capacity,' in order to maximise the effectiveness of choice, decision making, participation, etc. in the NDIS environment. To be able to provide this training, sufficient funding should be provided by DSS to all advocacy agencies, not just self-advocacy agencies. Local advocacy agencies know the culture of local service users better than agencies based in metropolitan cities.

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

Yes. We believe the outputs of the Framework are still relevant. DAN believes that specific framework outcomes and outputs should be developed against the various advocacy models and that adequate levels of funding are provided to ensure that they are measurable and can be effectively delivered in a cost effective and yet accountable way.

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

Currently yes, however, we aren't sure about the future disability environment. Our service hasn't experienced any systemic issues relating to NDIS provision and there hasn't been any acknowledgement of who will do what in relation to any NDIS hiccups, given that DAN is funded to provide the individual advocacy model only.

We believe that the need for advocacy support will be even greater once the NDIS is fully rolled out in DAN's funded service areas. Furthermore, people who have a disability who don't meet the requirements of the NDIS will still have the same desires to improve their living conditions as those in their community who have been accepted in the NDIS, ie., they will still require changes to their living conditions, such as different residential preferences, having modifications made to their homes, obtaining additional mobility aids in order to live independently, acquiring open employment, attending different day programs, etc etc.

DAN recommends strongly that the existence of locally based independent advocacy agencies is a must, especially for regional centres and remote towns. Local agencies have the knowledge of local issues and services.

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

DAN's overall comment is that although the Framework is by its very nature a general overview, it contains too many statements of principals that have very broad application. In our opinion, the Framework needs to be much more specific with greater reference to the NDIS.

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