

24 July 2015

To whom it may concern

Macarthur Disability Services (MDS) is pleased to provide a response to the review of the National Disability Advocacy Framework.

Macarthur Disability Services is a not for profit community organisation that has been providing services for people with a disability since living in the South West Sydney, Macarthur and Wingecarribee regions since 1983. Since its establishment, MDS has been a provider and involved in both individual and systemic advocacy with people with a disability and currently receives funding from the NSW Government to provide an Information and Advocacy service.

This response to the review of the National Disability Advocacy Framework is informed by years of experience of provide advocacy and working alongside individuals requiring advocacy.

Macarthur Disability Services Response

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

Response

MDS believes the current Framework aligns with our organisational vision to uphold the rights of people with a disability. MDS has embedded a rights based approach into its strategic plan and day-to-day operations. Advocacy is viewed as a key component of ensuring each individual's rights are being met and also as a way of empowering people to have their voice heard on issues that are important to them.

MDS works alongside people with a disability to build their capacity to become self-advocates wherever possible. This aspect of advocacy is particularly important in the context of the NDIS as people with a disability gain confidence to talk about their dreams and goals in assessment, plan development and review.

Systemic advocacy will still be required to ensure that people with a disability are included in all aspects of society and realise their citizenship rights. Whilst the NDIS promotes individual choice and inclusion, MDS believes that there will be instances where systemic advocacy is necessary to continuously challenge systems that work to exclude people with a disability either directly or indirectly. Systemic advocacy will underpin the objectives of the NDIS.

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?

Response

MDS supports the principles of the Framework. In particular, MDS believes that point 10 (d) 'Disability advocacy promotes leadership and capacity building by people with disability', is especially important in the context of the NDIS. People with disability should be supported and encouraged to take leadership in all aspects of their lives as much as possible. This also means exercising leadership and both an individual and systemic level.

One inclusion into the principles that MDS recommends is a focus on ensuring timely responses to people with disability requiring individual advocacy. It is the experience of MDS that people with a disability often require advocacy to address crisis or situations when a person is at imminent risk of harm. Whilst MDS acknowledges that the NDIS will reduce the likelihood of people finding themselves in crisis, MDS believes there will be circumstances that may require an immediate response. Additionally, MDS has also encountered people with disability that had approached advocacy services and had been turned away or told to wait up to 2 – 4 weeks before assistance could be provided.

Building timely responses into the guiding principles will highlight the necessity for advocacy action when it is needed.

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

Response

Overall, MDS believes that the current outcomes are still relevant. However MDS recommends the inclusion of a stronger reference to leadership and capacity building as an outcome as people with disability move towards realizing their full potential through take up of the NDIS. Inclusion of leadership and capacity building would also link the promotion of leadership and capacity building to the underpinning guiding principles of both the National Disability Advocacy Framework and the NDIS Information, Linkages and Capacity Building Framework

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

Response

The current outputs contained within the current Framework are supported however MDS also recommends the addition of disability advocacy strategies and action that increase capacity building with people with disability and at a community level.

The addition of capacity building as an output will emphasize the responsibility of advocacy providers to engage people with disability in capacity building strategies that build on their

existing strength. It will also provide additional evidence based data that links the important role advocacy will play in the future implementation and success of the NDIS and link outputs to related outcomes of the Framework.

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

The current Framework provides a sound foundation to support the current and future disability environment. In particular the reference to the National Quality Framework emphasises the importance of including quality into all aspects of service provision and support for people with a disability.

Additionally, the inclusion of data collection remains an important aspect of the Framework to provide a quantitative picture of take up of individualised funding packages. However, with regard to the latter, MDS recommends inclusion of qualitative data collection methodology to enable a clearer examination of whether people feel they are better off through advocacy and its linkage to full involvement in NDIS decision making. MDS notes the inclusion of a movement towards outcome based reporting in the current Framework. A stronger emphasis on qualitative data collection along with quantitative methodology within Framework would enable collection of data that meets the aim of transparency and accountability across the current and future disability environment.

MDS believes that advocacy must be ongoing, not just at the initial NDIS assessment and plan development stages. Advocacy will also be required at plan review to enable people with disability to have a say about goal changing and associated activities. Advocacy will also be required in situation when people are not happy with any aspect of plan implementation.

Abuse and neglect are unfortunately issues that MDS regularly provide assistance. MDS recommends that a greater emphasis is placed within the Framework on the use of advocacy to support people experiencing abuse and/or neglect. MDS acknowledges the reference to the United Nations Convention on the Rights of Persons with Disabilities, however MDS believes and recommends that a more clearly articulated reference to the prevention of abuse and neglect be added to the Framework. A greater understanding of the vulnerability of people with disability should be facilitated via advocacy that is also embedded into the implementation of the NDIS.

6 Additional Comments

MDS welcomes the review of the National Disability Advocacy Framework. The implementation of the NDIS will require advocacy support for people with a disability as they navigate their way through the NDIS system.

The current Framework references the following statement from National Disability Agreement:

‘Governments agreed to consider improvements in administration of advocacy services, with a focus on improving service delivery and access to advocacy services for people with disability . Responsibility for funding advocacy services will be reviewed in this process’

This statement highlights Government agreement to improving access and review of responsibilities for funding. Moreover, the initial intent of the Framework was a nationally consistent approach to both individual and systemic advocacy. MDS believes that this has been achieved to some extent

and has welcomed the current funding programs that support advocacy, however wishes to raise a concern that a more committed and consistent approach to funding advocacy support will be required to ensure successful implementation of the NDIS. MDS recommends a stronger reference to a committed provision and review of adequate funding from both Commonwealth and State governments be built into the Framework.

Summary of Recommendations

1. Recommendation: inclusion into the principles a focus on ensuring timely responses to people with disability requiring individual advocacy
2. Recommendation: the inclusion of a stronger reference to leadership and capacity building as an outcome
3. Recommendation: within the outputs inclusion of the addition of disability advocacy strategies and action that increase capacity building with people with people with disability and at a community level
4. Recommendation: inclusion of qualitative data collection methodology to enable a clearer examination of whether people feel they are better off through advocacy and its linkage to full involvement in NDIS decision making.
5. Recommendation: that a more clearly articulated reference be added to the Framework to the prevention of abuse and neglect.
6. Recommendation: a stronger reference to a committed provision and review of adequate funding from both Commonwealth and State governments be built into the Framework.

Once again thank you for the opportunity to comment. If any person wishes to discuss this response please contact either Lynne Bennett (General Manager Operations) or Julie Deane (Director, Community Mental Health and Training) on telephone (02)4621 8400.

Yours faithfully

A handwritten signature in black ink that reads "Lynne Bennett". The signature is written in a cursive style with a large initial "L".

Lynne Bennett
General Manager Operations
Macarthur Disability Services Ltd