

31/7/2015

VicRAN’s submission to the 2015 review of the National Disability Advocacy Framework

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

The Framework needs to acknowledge that while the rollout of the NDIS will significantly improve the quality of life for some, there will be large numbers of people with a disability who will not qualify for the scheme. It is anticipated the scheme will support up to half a million people. It is accepted that 18 percent of the Australian population experience some kind of disability, a higher percentage in Indigenous communities. There will be more than four million people outside of the NDIS whose need for advocacy will not be diminished by the rollout. On the contrary, the need will be greater as many services become increasingly NDIS focused. Anecdotally, already in trial sites, people seeking services are being knocked back because they are not “in” the NDIS. A person without a plan and package could find themselves isolated from the supports they need and more vulnerable than ever.

It is widely acknowledged that for those who do qualify for a plan and package, the support of an independent advocate throughout the application and implementation process is a great advantage. The Framework needs to emphasise the relevance and importance of advocacy for those engaging with the NDIS. It needs also to acknowledge that the NDIS is not a panacea for the myriad of challenges and obstacles faced by people with a disability, and that society will not suddenly become more rights focused and inclusive simply because of the NDIS. The rights and inclusion of people with a disability have always been the focus of independent advocacy, and this will remain the case.

In rural areas there is often little competition for the delivery of support services. Advocacy is important in monitoring the quality of services and helping people to make a complaint to the provider when things are not working, or take things to a higher level if the initial response is inadequate.

Whoever is responsible for the funding of advocacy needs to acknowledge that the effectiveness of the Framework and the National Disability Strategy relies upon the adequate funding of advocacy. The Framework needs to include a commitment to a CPI increase to funding each year as a minimum, just to keep pace with the increasing cost of living and wages.

Compulsory competitive tendering for advocacy funding would be a counter productive measure in this period of enormous change within the advocacy and wider disability sector, and is bound to have a detrimental effect on the level of service available to people with a disability as scarce resources within agencies are diverted to the tendering process.

Commonwealth and State funding bodies, and advocacy agencies, have invested considerable resources in the external auditing process. The results of these audits are testament to the quality of the work and the outcomes achieved by the advocacy sector, particularly in regards to the client interviews. The audit reports themselves reveal much about the effectiveness of advocacy, despite the under resourcing that exists in the sector. The return per dollar to the funding bodies from advocacy is not matched by any other type of disability support agency.

1. *Are the* [***principles***](#_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?*

The principles are comprehensive and well expressed. They would be enhanced by the following addition: “Disability advocacy exists for all people with a disability, regardless of the funded supports they have secured for their quality of life. In some cases disability advocacy may be the only support a person has.”

1. *Are the*[***outcomes***](#_Outcomes)*of the Framework still relevant or should different ones be included? If so, what should be included?*

The outcomes should include: *“*People with a disability receive FREE advocacy support that is suited to their individual circumstances and choices and does not rely on their eligibility for the NDIS”.

1. *Are the* [***outputs***](#_Outputs)*of the Framework still relevant or should different outputs be included?*

The outputs should include: “Disability advocacy that is adequately resourced, with allowances made for the additional costs involved in providing a service in rural and remote areas”.

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

The Framework needs to consider the possibility that the NDIS will create a two tier system, and that those who are not eligible will be no less in need of advocacy and other supports, particularly in the area of mental health. Advocacy needs to be for everyone.

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

The definitions of advocacy in the Framework are comprehensive and well explained. **However, the definition of advocacy in the NDAF discussion paper falls well short.**

It is bewildering to see “find employment and training” as one of the definitions. We understand that the Commonwealth Government invests many millions of dollars in an employment and job seeking network to perform this role. Advocates may inform their clients about where they can obtain this kind of assistance, but it is not the advocate’s role to put people into jobs or training programs. This has never appeared in any previous documents regarding advocacy definitions from Commonwealth Departments and should be removed from the definition in the discussion paper to avoid any confusion.