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National Disability Advocacy Program
Department of Social Services
PO Box 7576
Canberra Business Centre ACT 2610

Submitted online via DSS Engage

Review of National Disability Advocacy Program

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing Australians from culturally and linguistically diverse (CALD) backgrounds. We work to promote fairness and responsiveness to our constituency in the delivery and design of government policies and programs. At the heart of FECCA's work is promoting multiculturalism, embodied in equitable policies and non-discriminatory practices for all Australians, regardless of their cultural, linguistic, ethnic, racial or religious backgrounds. Towards this end, FECCA strives to ensure that the needs and aspirations of various cohorts of Australia's CALD population are heard by policy and decisions makers, as well as the broader public. FECCA continues to work with organisations that advocate for people with disabilities from CALD backgrounds, including the National Ethnic Disability Alliance (NEDA).

In July 2015, FECCA made a comprehensive submission to the National Disability Advocacy Framework which addresses a large number of concerns raised in the current National Disability Advocacy Program (NDAP) discussion paper.¹ This submission should be read in conjunction with Annexure 1.

FECCA is pleased to note that the Discussion Paper specifically clarifies that in addition to the six focus advocacy areas, agencies will be funded to specialise in providing advocacy support to *inter alia* people from diverse cultural and linguistic backgrounds. This ensures that tailored supports are provided to more vulnerable and marginalised cohorts. It is vital that the NDAP specifies as to what additional supports would be provided to organisations working with the marginalised communities.

¹ Annexure 1, FECCA's submission for the National Disability Advocacy Framework.

FECCA also supports an advocacy framework that is based on human rights of a person with a disability and their individual needs.

Funding model

Currently, responsibility for funding disability advocacy services is shared between the Commonwealth and the State and Territory Governments with the exception of South Australia.² Individuals with disability and their family members and carers immensely benefit from receiving advocacy services at appropriate times. The inconsistencies of funding models adopted by different State and Territory Governments may disadvantage certain cohorts, thus, a nationally consistent framework must be established with uniform guidelines and principles to ensure equality of access to advocacy services.

The discussion paper further elaborates that depending on the next steps of the review, certain organisations may need to consider changes in structure, partnerships, service delivery, target groups and coverage.³ FECCA recommends that changes in relation to service delivery include mandatory training on cultural understanding and sensitivity.

As highlighted in our previous submission (annexure 1) funding provided for one or two models of advocacy may hinder the ability of organisations to deliver services, as one person's situation may require several models of advocacy. Due to the capacity and strain on existing providers, advocacy services rightfully prioritise advocacy for those in crisis situations such as homelessness, neglect and abuse which may result in delaying service delivery for people who require assistance with other areas such as navigating the disability support system, identifying and obtaining assistance with regards to employment opportunities and other non-crisis related advocacy needs. A funding model based on compartmentalising advocacy models could potentially be futile as situations that call for advocacy are intertwined.

It is also important to note that some individual advocacy needs are often short-term and one off occurrences. Thus, it is important for the advocacy services to build capacity of individuals to become effective and efficient self-advocates.

In addition, the peer-led advocacy model - both at individual and systematic level - can largely benefit people with disability and their carers from migrant and refugee backgrounds to address issues they experience in accessing services and community participation. The peer-led advocacy model has been found to be an effective approach in advocating for people with disability and people with mental health issues.

A research found clients involved in a peer-led program that empowered mental health consumers increased their assertive/advocacy skills.⁴

The NSW based, Diversity and Disability Alliance currently runs a successful self-funded peer-led advocacy program. A similar model can be adopted with adequate funding and resources to empower people from marginalised backgrounds to advocate for themselves on needs and issues in accessing the NDIS, other disability supports and mainstream services.

² Department of Social Services, *Review of the National Disability Advocacy Program* (April 2016), 2.

³ Ibid 3.

⁴ Carolyn C. Clarke, Karen K. Paraska, *Health Promotion for Nurses: A Practical Guide* (2012), 207.

Improving access for people from CALD backgrounds

FECCA is pleased that the discussion paper identifies and acknowledges social isolation, communication difficulties, and lack of culturally appropriate or accessible supports as key barriers for people from CALD backgrounds in accessing advocacy supports.

The NDAP must identify the contributions made by community organisations, community members and family members on behalf of people with disability, especially within migrant and refugee communities. There are risks associated with informal advocacy as these individuals are not properly trained to provide such services. Thus, it is vital that appropriate advocacy mechanisms are in place to assist people with disabilities, their carers and family members as well as the communities as a whole.

Developing a culturally aware and sensitive workforce, including those providing disability advocacy is vital in assisting people from migrant and refugee backgrounds. There is little clarity in relation to provision of language services in general.

The discussion paper is silent as to whether the age of a person with a disability will be a bar to access advocacy services under the NDAP. The Productivity Commission report 'Caring for Older Australians' discusses the intersectionality between disability and aged care sectors at length and specifically states that, the Commission strongly advocates that adequate care and support should be available *in both the disability care and aged care systems* [emphasis added].⁵ The report further recommended the establishment of an Australian Seniors Gateway Agency that caters for diversity by:

- ensuring all older people have access to appropriate information and assessment services
- facilitating access for people with language and cultural needs through the development of specific hubs for older people from diverse backgrounds that have limited English skills and require access to bi-lingual staff (recommendation 11.2).⁶

Considering this recommendation, FECCA encourages adopting a coordinated approach whereby organisations specialising in providing advocacy services for people from non-English speaking backgrounds receive additional funding to account for the cost of language services, staff training and other associated costs. In the absence of an organisation working specifically with people from diverse backgrounds, such additional funding should be provided to organisations with a proven track record of working with this particular cohort.

Building collaborations with multicultural communities and networks through multicultural settlement services, across aged care, health, employment, education and disability have been found to be effective advocacy strategies that improve access of the people from CALD backgrounds to advocacy services. These networks across sectors can facilitate effective channels of communication to reach these communities in a culturally appropriate manner.

⁵ Productivity Commission Inquiry Report, *Caring for Older Australians*, No 52, 28 June 2011.

⁶ Ibid p 68.

Improving the advocacy database and coordination on systemic issues

Clear and accurate data is vital in designing services and developing service delivery strategies. FECCA and the other sector organisations have constantly raised the concern that data collection mechanisms are not adequately equipped or designed to capture data on Australia's diversity.

This will require a consistent and coordinated whole of government approach and better coordination between agencies, including the Australian Bureau of Statistics (ABS), Department of Immigration and Border Protection (DIBP) and disability sector organisations.

The National Aged Care Alliance (NACA) is an effective structure that develops policies, shares information and works in collaboration to bring about positive changes. NACA is a forum of peak national organisations in aged care, including consumer groups, service providers, unions, and health professionals, working together and engaging closely with government agencies to design a more positive future for aged care in Australia. A similar structure can be established to improve coordination on systemic issues in relation to delivery of advocacy services.

The interface with the NDIS and other frameworks

People with disability who are eligible to receive supports under the NDAP will require specific assistance, especially in relation to navigating the consumer focussed services that are designed to provide more choice and control to the end users. There is little clarity in relation to the interface between the Information, Linkages and Capacity Building Framework (ILC framework) and funding advocacy services under the NDAP. As elaborated above, people with disability over 65 years of age and are not in receipt of NDIS will also need to access disability advocacy services in order to obtain disability specific services. This Discussion Paper is silent on the intersectionality between the NDAP and the Aged Care Advocacy Services. Thus, there needs to be more clarity in terms of these different interfaces and how advocacy services will utilise funding and other resources to assist individuals with diverse needs.

A number of processes and frameworks providing various types of supports to people with disability are currently undergoing review processes including the National Disability Advocacy Framework, National Disability Employment Framework, the NDIS Quality and Safeguarding Framework and the like which are all interconnected. Hence, it is arduous to comment on the interface between the NDAP and the NDIS, when there is little clarity as to how the other interfaces will operate in practice and the services that will be delivered under each of these separate processes.

Understanding and improving access to justice

Access to justice is a real concern for people with disability, especially if they have conditions that limit the ability to communicate. These disadvantages are compounded for people with disability from various ethnic backgrounds due to stigma and cultural barriers around certain forms of abuse and limitations in relation to language and digital literacy and access. Lack of awareness about complaints mechanisms is also a limitation in terms of access to justice. FECCA highlighted these concerns in the NDIS context in the submission

to the NDIS Quality and Safeguarding Framework, including the need to ensure that people from CALD backgrounds understand and are familiar with complaint mechanisms and procedures.

Recommendations

- Provide additional resources and funding to advocacy providers who are working with people from migrant and refugee backgrounds in each State and Territory. In the absence of an advocacy service provider for CALD communities, the additional funding should be provided to organisations with ties to the local migrant and refugee communities.
- Identify creative models of funding to increase peer-led advocacy, building collaborations between cross-sector services and community organisations to empower people with disability from multicultural backgrounds.
- Educate people about the available avenues to access justice including the right to lodge complaints, complain procedures and frameworks in relation to protection of anonymity when lodging complaints or accessing justice.
- Adopt a coordinated and comprehensive data collection model to assess the effectiveness of the services delivered and make such data available to public in a timely manner.
- Clarify the interface between NDAP and other relevant support frameworks and advocacy services in other sectors.

Annexure 1

23 July 2015

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Submitted online via DSS Engage

National Disability Advocacy Framework

Introduction

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing Australians from culturally and linguistically diverse (CALD) backgrounds. We work to promote fairness and responsiveness to our constituency in the delivery and design of government policies and programs. At the heart of FECCA's work is promoting multiculturalism, embodied in equitable policies and non-discriminatory practices for all Australians, regardless of their cultural, linguistic, ethnic, racial or religious backgrounds. Towards this end, FECCA strives to ensure that the needs and aspirations of various cohorts of Australia's CALD population are heard by policy and decisions makers, as well as the broader public. FECCA continues to work with organisations that advocate for people with disabilities from CALD backgrounds, including the National Ethnic Disability Alliance (NEDA).

According to the *Survey of Disability, Ageing and Carers*, 4.2 million or 18.5% of Australians live with disability.⁷ More than 1 million people with disabilities in Australia are from CALD backgrounds.⁸ In other words, CALD people constitute close to one fourth of the total number of people with disabilities living in Australia. These individuals are often subjected to two fold discrimination based on their disability as well as their CALD background.

The assistance received through disability advocacy services significantly improves the lives of people with disability, especially when navigating through the government support systems, including the National Disability Insurance Scheme (NDIS/ the Scheme).

Considering these factors, FECCA commends the efforts of the Government to improve and make the advocacy services more accessible for people with disability and thanks the Government for offering this opportunity to provide feedback and recommendations on the current advocacy framework.

⁷ Australian Bureau of Statistics, *Survey of Disability, Ageing and Carers (2012)*.

⁸ National Ethnic Disability Alliance, *Disability Employment Services (DES) Consumer Engagement Project* (June 2014), 4, accessed at:
http://www.neda.org.au/images/reports/NEDA_DES_PROJECT_2014.pdf

Current advocacy framework in the NDIS environment

The NDIS is one of the most important social reforms in relation to welfare of people with disability in the recent history. The Scheme provides people with disability an invaluable opportunity to be independent and pursue their potential through an individually tailored and self-directed funding program. The NDIS creates a uniform system of disability services across Australia and increases the social and economic participation of people with disability.

FECCA reiterates that it is important for a government-funded disability advocacy body to remain separate and independent of the NDIS as recommended by the Productivity Commission in 2011. This structure will assist to avoid issues pertaining to bias and/or conflict of interest.

It is commendable that the current National Disability Advocacy Framework (the Framework) recognises and acknowledges that people with disability are experiencing multiple disadvantages based on ethnic and cultural backgrounds. However, this acknowledgment is not supported by outcomes and outputs detailed in the Framework. Given the absence of reference to multiple disadvantages based on ethnic and cultural backgrounds within the outputs of the Framework, it is arduous to achieve the objectives and outcomes stipulated therein. Considering the large proportion of CALD people with disability in Australia it is essential that the Framework revise the objective, outcomes and outputs to reflect the needs of this cohort.

The very first principle that guides the provision of advocacy for people with disability in Australia is that disability advocacy operate under the *United Nations Convention on the Rights of Persons with Disabilities* (CRPD) and Australia's other relevant international obligations. Article 30 of the CRPD stipulates that the state parties recognise the rights of a person with disabilities to engage in a cultural life. As a result, the principles of the Framework encompass the obligation to ensure that people with disability enjoy cultural rights on an equal basis with others.

Differentiating and discriminating people with disability based on their residential status are contrary to Article 5 and Article 28 of the CRPD, which protects equality and non-discrimination and the right to adequate standard of living and social protection respectively. Article 5 (iv) of the *Convention on Elimination of Racial Discrimination* (CERD) stipulates that state parties undertake to prohibit and to eliminate racial discrimination in all its forms and to guarantee the right of everyone, without distinction as to race, colour, or national or ethnic origin, to equality before the law, notably in the enjoyment of the [...] right to public health, medical care, social security and social services. Thus, any limitation or restriction on accessing services, including advocacy services, will be contrary to the protections guaranteed under these international instruments.

Eligibility for the NDIS is limited to those who hold Australian citizenship, permanent residency or hold a protected special category visa, excluding many CALD people with disabilities who have a different visa status. Additionally, the NDIS is expected to support 460,000 individuals, approximately 11% of the 4.2 million people with disability in Australia. Thus, it is vital for government agencies to identify and promote programs to assist people with disability who are not eligible to participate in the NDIS.

CALD people with disability are considerably under-represented in the NDIS. This lack of engagement of CALD people in the NDIS was highlighted in the *NDIA Annual Report 2013-14*, where the National Disability Insurance Agency (NDIS/the Agency) resolved that improving interaction with CALD communities and Indigenous communities was a priority in

2014-15.⁹ However, according to the *National Disability Insurance Agency Quarterly Report to COAG Disability Reform Council, 31 March 2015*,¹⁰ the CALD engagement was only 4% in the current trial sites, which is an increase of only 1% since 30 September 2014.¹¹ This minimal participation within the NDIS could be a result of inadequate allocation of resources for advocacy services to engage people from CALD backgrounds.

Principles of the Framework and advocacy in a changing disability environment

Developments in technology, medical treatments and procedures, understanding of and education about various forms of disabilities positively impact people living with disabilities, their family members and carers. Advocacy services play a very prominent role in educating the public about these developments.

The Framework and advocacy service providers must understand different layers of identity without limiting the intersecting disadvantages to standard identity measures such as age and sex, as they should extend to ethnic, cultural, religious backgrounds and gender identity.

Social inclusion

The Productivity Commission recognised the importance to people of participation (not just in paid work, but in volunteering and social activities), relationships and of feeling connected to the community with regard to social inclusion.¹² Promoting the interests and wellbeing of people with disability and promoting full and valued inclusion as contributing and participating members of the community are principles contained in the Framework. These aims can be achieved through measures enhancing economic participation and social inclusion of people with disability.

There are numerous gaps in relation to economic participation of people with disability from CALD backgrounds, including, barriers to enter the workforce, lack of knowledge about employment services such as JobAccess, Disability Employment services and JobActive, limited access or lack of awareness of government supports such as the Disability Support Pension and mobility allowance.¹³

Long periods of unemployment affect the employability of people with disability from CALD backgrounds. Amartya Sen explains the importance of employment:

People not only 'learn by doing', they also 'unlearn' by 'not doing', that is, by being out of work and out of practice. Also, in addition to the depreciation of skill through non-practice, unemployment may generate loss of cognitive abilities as a result of the unemployed person's loss of confidence and sense of control. In so far as this leads to the emergence of a less skilled group — with merely a memory of good skill —

⁹ National Disability Insurance Agency 2013-2014 Annual Report, 23.

¹⁰ National Disability Insurance Agency, Quarterly Report to COAG Disability Reform Council (31 March 2015).

¹¹ National Disability Insurance Agency, Quarterly Report to COAG Disability Reform Council (30 June 2014) .

¹² *Deep and Persistent Disadvantage in Australia*, Productivity Commission (2013), 175.

¹³ See further : FECCA submission for the National Disability Employment Framework 2015, 2-4, at: <http://fecca.org.au/wp-content/uploads/2015/07/Submission-for-the-National-Disability-Employment-Framework1.pdf>

there is a phenomenon here that can lead to a future social exclusion from the job market.¹⁴

Considering the strong nexus between employment and social inclusion, it is recommended that the Framework place more emphasis on workforce participation of people with disability with a special reference to people with disability from CALD backgrounds.

Capacity building and self-advocacy

Capacity building is extremely important for people with disability, especially because self-advocacy is considered to be the most effective form of advocacy. Educating individuals about their rights and entitlements plays a vital role. For example, a man was recently found guilty of abusing a minor with disabilities.¹⁵ The victim reported the offence four years after the abuse after she learnt about physical and sexual abuse at school. This example clearly demonstrates the sensitivities involved in working with vulnerable groups of the society and the need to educate people with disability about their rights, who they can approach for assistance, and reporting and complaint mechanisms.

Achieving successful outcomes through self-advocacy is dependent upon the capacity of an individual to practice it through effectively representing themselves. However, language barriers, cultural attitudes, limited experience of using complex service models in Australia and negative experiences prior to resettlement such as trauma may limit the capacity of people from CALD backgrounds to become effective self-advocates. Hence, it is important for the Framework to recognise the various barriers to self-advocacy and address them accordingly.

In certain countries making complaints against services rendered by other agencies, especially government agencies, is not a cultural norm. Thus, any measures adopted to educate the public should involve a thorough discussion of the right to complain about services and what complaint mechanisms are available to them. An effective advocacy framework plays a key role in empowering individuals to be proactive self-advocates, assisting individuals to navigate through the services available to them and educating them of rights, entitlements and complaint mechanisms. To assist with individuals who may have limited English language proficiency, information should also be provided about how to access the government's Translating and Interpreting Service (TIS National). This information should be easy to find and understand. It is necessary for the Framework to elaborate more on what measures can be utilised to build capacity and self-advocacy.

It is imperative for the advocacy framework to focus more on capacity building, self-advocacy and other advocacy tools which are key mechanisms of self-advocacy. People with disability from CALD backgrounds, their family members and carers must have a clear understanding about what amounts to an invasion of privacy, abuse and neglect, rights and entitlements, which can be achieved through targeted education and awareness programs.

Community awareness of disability issues

Technological advancements and the increasing availability of social media platforms can be utilised sensibly to enhance community awareness of issues that are affecting people with

¹⁴ A. Sen, 'Social exclusion: Concept, application and scrutiny', Social Development Papers No. 1 (June 2000), Office of Environment and Social Development, Asian Development Bank, as quoted in *Deep and Persistent Disadvantage in Australia*, Productivity Commission (2013) , 19.

¹⁵ ABC News, 'Sydney Taxi Driver Osman Chamseddine found guilty of assaulting deaf schoolgirl' (28 May 2015), accessed at: <http://www.abc.net.au/news/2015-05-28/osman-chamseddine-taxi-driver-guilty-indecent-assault-charge/6487470>

disability. However, all necessary measures must be adopted to ensure that the advocacy groups consult the peak bodies representing people with disability in order to deliver the message in a sensitive and an effective manner.

Recognition of diversity

There is some ambiguity within the Framework in relation to the principle that recognises and respects diversity. According to the Framework, 'disability advocacy recognises and respects the diversity of people with disability'.¹⁶ The document does not provide the description of *diversity* within the context of the Framework. Thus, the principle could be interpreted to connote diversity among different ethnic, religious or cultural groups or on the other hand, it could mean vast spectrum of diverse disabilities such as hearing or vision impairments, physical disabilities and the like. FECCA recommends that the Framework provides a clear explanation of the scope of diversity comprising of both cultural diversity as well as the diverse range of disabilities.

Principles of the Framework in light of the NDIS

The NDIS funds reasonable and necessary supports that help a participant to reach their goals, objectives and aspirations, and to undertake activities to enable the participant's social and economic participation.¹⁷ Participants of the NDIS will be empowered to lead an independent life, engage with the community and pursue their potential.

Participants in the NDIS would immensely benefit from receiving assistance from an advocate at the planning stages, especially those from CALD backgrounds, who may experience language barriers and/or difficulties in understanding the complex processes. Advocacy services must extend beyond the initial stage of planning and provide assistance to the NDIS participants to identify most suitable service providers, change the chosen service provider if the participant is not satisfied with the services rendered and participate in community and cultural events to ensure that they are fully and actively engaged in the community.

Funding advocacy services

For many individuals from CALD backgrounds, Australian laws, regulations and processes are different to those in their country of origin and thus they may require additional assistance to understand the system. Numerous community organisations provide advocacy services for CALD people with disabilities including advocacy with regard to homelessness, abuse and domestic violence. These organisations however, do not specifically focus on or provide advocacy services specifically on the NDIS. In this context, there is a possibility of NDIS related advocacy matters receiving a low priority as opposed to the emergency advocacy requirements such as abuse, violence and homelessness. Thus, it is important to identify the needs for advocacy services and provide further resources to adequately assist people with disabilities with a range of issues.

The Framework should make provisions for ensuring that advocacy bodies should appreciate and understand the demographics, social and cultural sensitivities in different States and Territories. FECCA believes that it is important for the Government to sufficiently fund State and Territory based disability advocacy bodies and other community organisations to ensure that hard to reach vulnerable communities are properly assisted and heard in the decision making process.

¹⁶ National Disability Advocacy Framework, Principles, 2[10 (g)].

¹⁷ See further : <http://www.ndis.gov.au/document/1116>

Building cultural competency among advocacy service providers will assist them to effectively engage with CALD communities in both individual and systematic advocacy processes. Thus, it would be beneficial for these advocacy bodies to have bilingual or multilingual employees and budgetary allocations to provide cultural competency and sensitivity training to advocacy service providers.

Special considerations in relation to CALD people with disabilities

The Framework as a whole is subject to the provisions of the *National Disability Agreement (NDA)* and the *Intergovernmental Agreement on Federal Financial Relations* and should be read in conjunction with those Agreements and subsidiary schedules. The NDA between the Commonwealth and the States and Territories, provides the national framework and key areas of reform for the provision of government support to services for people with disabilities.¹⁸ The reform and the policy direction of the NDA provides that consideration will be given to strategies specific to Indigenous Australians, *those from culturally and linguistically diverse backgrounds* [emphasis added], and those living in regional, rural and remote communities.¹⁹ The language used in this context is relatively generic and does not impose a binding obligation on the States and Territories to adopt specific measures in relation to CALD people with disabilities with regard to reform and policy direction. FECCA recommends adopting clear strategies with measurable outputs and outcomes with regard to policy development in order to accommodate the needs of these vulnerable groups.

The importance of gathering specific data to understand and assess the effectiveness, accessibility and accountability of government services with regard to disadvantaged cohorts in the society has been highlighted by FECCA on a number of previous occasions. As per the NDA, subject to the development of the data and an agreed method of disaggregation, performance indicators will be disaggregated to show performance for people from CALD backgrounds with disabilities.²⁰ The language used in this context is overly flexible, creates ambiguity and does not impose a concrete obligation on the parties to take proactive measures to ensure that data gathered on performance indicators are reflective of the people from CALD backgrounds.

Participants in FECCA's community consultations have expressed that people with disability from CALD backgrounds often need special assistance when accessing services. They receive assistance through organisations designed to provide formal advocacy services as well as informal advocacy through family members, friends, relatives and/or community members. These individuals also act as the interpreters for CALD people with disability who experience language barriers. Although it is encouraging to see people with disability from CALD backgrounds receiving informal advocacy as opposed to not receiving any assistance, there are inherent risks in relying on informal advocacy. An informal advocate may lack specific knowledge and understanding about technical and complex government services which may mislead or misinform the recipient. Thus, it is important for the advocacy framework to educate CALD people with disability as well as their family members, carers, friends and the broader community.

¹⁸ The National Disability Agreement between the Commonwealth and the States and Territories, Intergovernmental agreement on Federal Financial Relations, accessed at: <http://www.federalfinancialrelations.gov.au/content/npa/disability/national-agreement.pdf>

¹⁹ *Ibid* 7

²⁰ *Ibid* 5

Lack of awareness of services and assumptions about costs attached to obtaining assistance of interpreters or advocacy services may impede people from CALD backgrounds from obtaining services that they are entitled to receive. Government agencies already working closely with the community organisations such as Centrelink can be utilised as a vehicle to reach out to the communities to educate them about the availability of advocacy services.

Recommendations

- Adopt measures within the Framework to adequately fund existing State and Territory based advocacy bodies to provide advocacy services to CALD communities, including advocacy services in relation to NDIS. Specific budgetary measures must be adopted to accommodate the costs attached to translating and interpreting services.
- Clearly recognise the importance of cultural sensitivities and cultural appropriateness of advocacy service delivery in the Framework to alleviate or minimise the barriers faced by people from CALD backgrounds in accessing government services including advocacy services.
- Encourage States and Territories, through the Framework and/or the NDA, to adopt specifically targeted strategies to address the advocacy needs of vulnerable segments of the communities including CALD communities. These targeted strategies must include provision of advocacy services for NDIS participants from CALD backgrounds.
- Develop joint reporting and data collection obligations with States and Territories within the Framework and the NDA to measure the performance and responsiveness of services with regard to CALD specific service delivery.
- Recognise the importance of employment in terms of economic and social participation of people with disability within the Framework and ensure that advocacy bodies adopt appropriate measures to assist CALD people with disability to overcome barriers in entering the workforce and promote community engagement.
- Place greater emphasis within the Framework on the importance of capacity building and self-advocacy among community groups that are facing multiple intersecting disadvantages.
- Focus on the importance of informal advocacy in the Framework, especially among CALD communities, and adopt measures to educate CALD community leaders, family members and carers of CALD people with disability about relevant services, rights and entitlements in general as well as in the context of the NDIS.
- Provide a clear explanation as to the scope of the term 'diversity' within the Framework as comprising of both cultural diversity as well as the diverse range of disabilities.