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The Department of Social Services
Disability Advocacy Policy
GPO Box 9820
Department of Social Services
Canberra ACT 2601

104 Greenhill Road
Unley SA 5061

t: (08) 8373 8333

f: (08) 8373 8373

e: admin@purpleorange.org.au

w: www.purpleorange.org.au

By email: disabilityadvocacysecretariat@dss.gov.au

Dear DSS Engage Team,

Re: National Disability Advocacy Framework 2022-2025

Thank you for the opportunity to comment on the draft National Disability Advocacy Framework 2022-2025 ('the Framework'). We have enclosed a copy of JFA Purple Orange's policy position paper in relation to Advocacy, which we hope will be helpful. The paper was drafted in 2021 and identifies many themes and recommendations pertinent to this inquiry.

In addition to providing you with our Advocacy policy position paper, we would like to take this opportunity to comment on specific aspects of the Framework. These are set out below:

1. The Objective

1.1 If a person living with disability is unable to find the advocacy support they need in a timely way, they are likely to leave their issue(s) unresolved and at risk of escalating to a significant safeguarding issue. They may also turn to people they know and trust for advice when those people (while good intentioned) may not necessarily have the expertise and technical knowledge required to find the best solution. This can lead to misinformation, missed opportunities for action and lack of informed choice.

A lack of independent advocacy services can also result in service providers offering their own internal 'advocacy' services, resulting in conflicts of interest that pose safeguarding risks for the people living with disability involved.

Further, a lack of funded advocacy has reportedly resulted in a significant rise in fraudulent activities by providers.¹

¹ 'Disability Rights Now 2019, 'Australian Civil Society Shadow Report to the United Nations Committee on the Rights of Persons with Disabilities: UN CRPD Review 2019, footnote 31, available at <https://dpoa.org.au/wp-content/uploads/2019/08/CRPD-Shadow-Report-2019-English-PDF.pdf>.

With respect to the Objective, we believe it should be updated to include reference to *timely* and *independent* advocacy services. The new Objective would therefore read:

People with disability access *timely, independent* and effective disability advocacy that promotes, protects and ensures their full and equal enjoyment of all human rights, enabling full community participation and inclusion.

2. Outcomes

JFA Purple Orange supports the Outcomes proposed in the Framework and suggest the following changes:

2.1 We recommend numbering each Outcome to improve readability.

2.2 We also recommend updating the fourth outcome to include the word *timely* so that it reads:

Regardless of where they live, people with disability can access *timely*, quality and independent advocacy support.

2.3 We believe the following Outcome should be updated so that the words “have the opportunity to be” are removed. We believe it is appropriate for the Framework to be more ambitious than simply aiming to provide opportunities, but rather to aim for people living with disability to be actively involved in all aspects of their development. This Outcome would therefore read:

People with disability ~~have the opportunity to be~~ are actively involved in all aspects of the development, delivery and evaluation of disability and broader government policies, programs and services that impact them.

2.4 Community based groups, such as peer networks, play an important role in supporting people living with disability to understand their rights and how to effectively engage in disability advocacy. Given the reference to ‘community-based groups’ in the definition of self advocacy, we also recommend adding this new Outcome to the Framework:

People with disability are able to access community-based groups, such as peer networks, to support them to engage in disability advocacy.

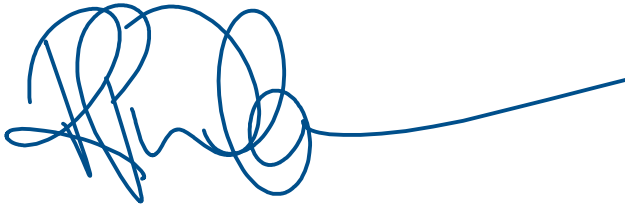
3. Implementation

31. The success of the Framework will hinge heavily on the yet-to-be-drafted disability advocacy work plan. As responsibility for the Framework rests across Commonwealth, state and territory governments, it is vitally important that each signatory is clear about its own responsibilities and what success (or failure) looks like in relation to the Framework’s implementation.

We recommend the work plan is co-designed by people living with disability, advocacy services and representatives from Commonwealth, state and territory governments. The work plan at a minimum should contain actions with specific timeframes and responsibilities.

Thank you again for the opportunity to provide feedback on the National Disability Advocacy Framework 2022-2025.

Yours sincerely

A handwritten signature in blue ink, consisting of several loops and a long horizontal tail extending to the right.

Robbi Williams
CEO, JFA Purple Orange