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**Submission to the
National Disability
Advocacy Framework**

July 2022

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About Anglicare Australia

Anglicare Australia is a network of independent local, state, national and international organisations that are linked to the Anglican Church and are joined by values of service, innovation, leadership and the Christian faith that every individual has intrinsic value. Our services are delivered in partnership with people, the communities in which they live, and other like-minded organisations in those areas. With a combined income of over \$1.94 billion, a workforce of over 11,000 staff and 6,000 volunteers, the Network delivers more than 50 service areas in the Australian community. Our services are delivered to over 474,00 people and reach close to 1.37 million Australians in total. In all, Anglicare services reach over 1 in every 19 Australians.

As part of its mission the Anglicare Australia Network “partners with people, families and communities to provide services and advocacy and build resilience, inclusion and justice.” Our first strategic goal charges us with reaching this by influencing “social and economic policy across Australia with a strong prophetic voice; informed by research and the practical experience of the Network.”

Contact

Kasy Chambers
Executive Director

Anglicare Australia
PO Box 4093
Ainslie ACT 2602
T: 02 6230 1775
anglicare@anglicare.asn.au

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Introduction

Anglicare Australia welcomes the opportunity to participate in the Department of Social Service's (DSS) consultation on the review of the National Disability Advocacy Framework (NDAF).

Through our services and advocacy, the Anglicare Australia Network partners with people, families and communities to build resilience, inclusion and justice. With a combined income of \$1.97 billion, a workforce of almost 19,000 staff and 8,000 volunteers, the Network delivers across more than 50 service areas in the Australian community, including disability services.

Independent advocacy improves the lives of many people with disability. It can enable people to live independently, manage their own lives, engage in decision-making, and fulfil their human rights. It can also be an important safeguard against abuse and neglect. A strong disability advocacy sector is a vital pillar of the disability support system and returns economic benefit that far outweighs its costs.ⁱ

The National Disability Advocacy Framework guides the operation of the National Disability Advocacy Program (NDAP), the Commonwealth's funding stream for disability advocacy, as well as the funding and policy oversight provided by state and territory governments for disability advocacy. The Draft Framework is comprehensive, and we thank DSS and participating state and territory governments for their work on the document.

The disability advocacy sector is chronically under resourced and unable to meet the demand from people with disability. Many disability advocacy services have been forced to close their books or maintain long waiting lists.

Not all disability advocacy is formally funded through the NDAF. Many people with disability self-advocate for themselves, and family members and friends frequently advocate on behalf of people with disability. With funding limited, some organisations provide advocacy services without formal advocacy funding, either as part of their day-to-day work with their clients, or by operating dedicated advocacy services. For example, Anglicare South Australia self-funds a team of advocates. Much of their work relates to accessing the NDIS, and helping to resolve issues for existing NDIS participants. They mostly work with people who have high and complex needs. They also assist people with disability to access education, financial counselling, and provide help dealing with Centrelink.

Other Anglicare agencies report they spend significant time supporting people in the development and review of NDIS plans, which can be time-consuming and demanding for people with disability. They also help and advocate for people ineligible for the NDIS, including those who previously received state disability services which have now shifted to the NDIS. There is no formal advocacy funding for this kind of work.

This submission makes a number of suggestions for improvements to the NDAF, to streamline quality and reporting requirements for the sector, and increase funding to better protect the human rights of people with disability.

Draft Framework

Refine the Objective

The Objective of the NDAF commits the Government to a “long-term” goal that “people with disability access effective disability advocacy that promotes, protects and ensures their full and equal enjoyment of all human rights, enabling full community participation and inclusion.” This wording updates a similar objective in the 2008 Framework, which also committed a “long-term” goal.

Anglicare Australia does not see any reason why this should be a long-term goal. The full and equal enjoyment of human rights for people with disability is not something that will be achieved immediately, however access to effective advocacy can be achieved in the short-term by better funding disability advocacy services to increase their capacity to respond to demand.

Recommendation

Anglicare Australia recommends removing “long-term” from the NDAF objective, in recognition that access to advocacy services and fulfilment of human rights should be an immediate priority.

Improve measurability and accountability

Anglicare Australia Network members and stakeholders reflected that the current NDAF is too broad, and should be more “outcome-oriented and measurable”.

The Draft Framework states that the new “Framework will be supported by a disability advocacy work plan which will drive the implementation of its objective, principles and outcomes.” It also commits the Commonwealth and state and territory governments to ensuring “the funding of disability advocacy is transparent, equitable and accountable, and geographical coverage and services gaps are identified and addressed.” This is a worthy goal, but it will be out of reach without a significant increase in funding to fill the gaps identified. It also fails to identify the mechanisms by which gaps will be identified, or funding will be made transparent. Clearer and more measurable actions are needed.

The 2008 Framework included reform and policy directions that committed parties to “improving the data collection for disability advocacy within the broader considerations and plans for the National Minimum Data Set...and...working towards outcome based reporting and evaluation of the disability advocacy sector to enhance transparency and accountability.”ⁱⁱ

Yet with the transition to the NDIS, the National Minimum Data Set ceased to exist. Little data is published about demand for disability advocacy services, or outcomes that are being achieved. Data collected from advocacy organisations often disappears into a “black hole” and is not analysed and published for use in planning, service design and policy analysis.

Anglicare Australia believes the NDAF include a commitment to publish data, including:

- Service demand, waitlist numbers, average waitlist times;
- Caseloads; and
- Types of cases (for example Tribunal appeals, assistance with Centrelink).

The monthly data provided for the Disability Employment Services is very helpful, and a similarly comprehensive dataset should be developed for disability advocacy services.ⁱⁱⁱ

In addition, the DSS Portfolio Budget Statement's reporting, while understandably high-level, could have its performance outcome measures for the NDAP updated. Currently, one of the two outcome areas relates to the extent to which people provided advocacy through the National Disability Advocacy Program experience improved choice and control to make decisions. The expected year end performance result for 2021-22 is that this was "partially on track".^{iv} This is an important metric, however we believe that a more useful performance measure will set a minimum threshold for the proportion of people who seek assistance from a funded disability advocacy service who are able to access advocacy services in a timely way.

Recommendation

Anglicare Australia recommends

- Improving disability advocacy data collection and publication, to better understand the demand for services and enable organisations to plan and design services to address gaps.
- Updating Portfolio Budget Statement performance measures to better reflect the number of people who are able to access advocacy services, and how many are turned away.

Supporting the delivery of Disability Advocacy

Boost funding for disability advocacy

Anglicare Australia Network members and stakeholders reported that demand for disability advocacy services outstrips the capacity of advocacy services to deliver, and the level of funding and coverage of disability advocacy service varies considerably across the states and territories.

Indeed, in 2019 the Productivity Commission's Review of the National Disability Agreement reported that "a clear theme of submissions was that advocacy services are at risk of being underfunded," and that state and territory funding for disability advocacy was inconsistent.^v

When the original Framework was adopted the NDIS was not in operation. NDIS appeals now occupy a substantial amount of the work undertaken by disability advocacy services. This work is time-consuming and expensive. The additional advocacy workload generated by the NDIS has not been adequately or fairly recognised by funding increases. Funding for disability advocacy services needs to better reflect this reality.

Additional funding should also be provided where delivery of services is more expensive, for example those that have a more decentralised population, or have a higher proportion of remote communities.

Capacity to undertake proactive outreach would help to engage marginalised and isolated people with disability. For example, some people have limited or no access to the internet or telecommunications. Others may have complex communication needs or severe intellectual disability, making it more difficult to gain information about their rights and entitlements or to contact advocacy services. They may require direct contact and engagement in order to receive assistance.

Recommendation

Anglicare Australia recommends increasing funding for disability advocacy to meet demand generated by the NDIS, and improve access for people in rural or remote communities or who experience barriers to accessing services.

Streamline reporting requirements

Current reporting requirements for disability advocacy organisations tend to focus on outputs, rather than outcomes, and place a high administrative burden on small organisations. The focus is largely on meeting contractual obligations, and data across funding sources is not well integrated or shared.

Reporting mechanisms for disability advocacy need to be coordinated and improved. Funded disability advocacy services currently report against the National Standards for Disability Services.^{vi} These Standards are better suited to the provision of care or other services than they are to advocacy.

It would be helpful to develop a set of standards aimed specifically at advocacy providers. The standards would replace existing reporting, rather than add additional workload for advocacy

services.

Recommendation

Anglicare Australia recommends working with disability services, independent advocacy organisations and people with disability to design national standards that are appropriate for the disability advocacy sector.

Strengthen community linkage role of LAC services

Local Area Coordination (LAC) services were originally envisaged as a mechanism to provide information and access to the NDIS as well as to a broader range of government services and other organisations, even for people who are not NDIS participants or are not eligible to be. Indeed, the NDIS website still notes that this is one of the roles of LACs.^{vii} Most LACs, however, primarily help with accessing the NDIS, and are less focused, if at all, on their community linkage function.

Anglicare Australia recommends that this important role of LACs be given more prominence. Some matters will not require the services of a formal advocacy provider and could be resolved with the help of an LAC. The advantage of this approach is that there is a solid network of LACs, and they specialise in helping people with disability. They would also be well placed to refer people to formal advocacy providers.

Recommendation

Anglicare Australia recommends enhancing the community linkage function of Local Area Coordination services.

Conclusion

Anglicare Australia appreciates the opportunity to comment on the draft NDAF, and to consider measures to strengthen the disability advocacy sector and better protect and promote the human rights of people with disability.

We look forward to continuing to engage with the Department of Social Services in the development of the framework and its implementation.

ⁱ Anne Daly, Greg Barrett and Rhian Williams (2017) [A cost benefit analysis of Australian independent disability advocacy agencies](#)

ⁱⁱ Australian Government (2008) [National Disability Advocacy Framework](#).

ⁱⁱⁱ Australian Government (2022) [Disability Employment Service Monthly Data](#).

^{iv} Commonwealth of Australia (2022) [Portfolio Budget Statements 2022-23 Social Services Portfolio](#).

^v Productivity Commission (2019) [Review of the National Disability Agreement](#).

^{vi} Australian Government Department of Social Services (2013) [National Standards for Disability Services](#).

^{vii} National Disability Insurance Scheme (2020) [Role of Local Area Coordination](#).