

DSS Engage Team  
National Disability Advocacy Framework 2022-2025 submission process  
[disabilityadvocacysecretariat@dss.gov.au](mailto:disabilityadvocacysecretariat@dss.gov.au)

Dear DSS Engage

### **National Disability Advocacy Framework 2022-2025**

Thank you for the opportunity to make a submission to the consultation process for the National Disability Advocacy Framework.

Advocacy for Inclusion incorporating People with Disabilities ACT is a leading independent organisation delivering reputable national systemic advocacy informed by our extensive experience in individual advocacy and community and government consultation.

We provide dedicated individual and self-advocacy services, training, information and resources in the ACT.

As a Disabled People's Organisation, the majority of our organisation, including our Board of Management, staff and members, are people with disabilities. Advocacy for Inclusion speaks with the authority of lived experience. We are strongly committed to advancing opportunities for the knowledge and experiences of people with disabilities to be heard and acknowledged.

Advocacy for Inclusion operates under a human rights framework. We uphold the principles of the United Nations Convention on the Rights of Persons with Disabilities (CRPD) and strive to promote and advance the human rights and inclusion of people with disabilities in the community. Advocacy for Inclusion is a declared public authority under the Human Rights Act 2004.

AFI broadly supports the recommendations and priorities for the framework and for disability advocacy funding by the Australian Government and the States and Territories outlined by DANA. We offer some priorities and areas of emphasis as follows:

- **A time for continuity:** The National Disability Advocacy Program and its funded organisations have been subject to multiple reviews and reform processes for over a decade. Federally funded disability advocacy has, at times, been caught in a cycle of permanent review. Added to this the NDIS transition saw an extended period of uncertainty for advocacy organisations and a lack of clarity around funding responsibilities for advocacy. Advocacy

organisations have been supporting vulnerable people through a period of intense and chaotic disruption throughout the COVID19 pandemic. It is time to recognise that disability advocacy is a public good that holds intrinsic value as a tier 2 support for people with disability. Advocating against barriers, discrimination, poverty and supporting within situations of crisis. Advocacy is also required to meet Australia's obligations under CRPD. Funding and contract arrangements should be stable, adequate and provide continuity.

- **Respecting disability voice:** The framework should specifically emphasise and safeguard the intrinsic value of advocacy lead by DPO'S. To amplify and centre the voices of people with disability facing discrimination in discussions. It should include a shared commitment by Federal and State/Territory Government to guarantee consideration of the opinions and the independence of advocates.
- **Co-design:** We are looking to the NDAF to include a commitment to genuine co-design, community partnerships and two-way data sharing. Governments should recognise advocacy organisations as an asset in solving complex problems and implementing the Australian Disability Strategy and State and Territory strategies.
- **Data collection:** There needs to be a fresh approach to data collection and sharing that recognises the complex nature of advocacy support, the role of advocacy as a system saver, the need for red tape and reporting reduction as well as the potential for data sharing to inform good advocacy and government responses.
  - For instance, reporting on the life of an advocacy issue is problematic as it suggests advocacy issues have a linear beginning, middle and an end – in reality advocacy is about people with fraying complex lives and multiple difficult circumstances. Issues may not be 'solved' but advocacy may prevent a deterioration in a persons circumstances - advocacy is often a system saver which prevents people falling into acute care, hospital, corrections or homelessness. Data collection should be meaningful and nuanced.
  - Further there should be meaningful feedback and dialogue and sharing of data by funders with organisations. Feedback to funding partners should include issues identified across the program and information on how reporting provided by organisations is helping to shape government policy and address issues identified through advocacy.
- **Early intervention:** The framework should recognise the importance of allowing scope for early intervention and preventative advocacy. Current funding levels and demand for service mean advocates are always reactive providing an "ambulance at the bottom of the cliff". Better funding would mean more capacity to meet demand, but also to focus on areas we see the biggest barriers for people with disability and develop self-advocacy resources, information and rights based knowledge so people can better navigate complex systems. NDIS ILC helps in some of this area, but this mainly funds short term, specific projects and comes with an added layer of reporting.
- **Sector development:** The framework should provide a platform for sector development and continuous improvement. DRO, DPO and advocacy organisations should be adequately funded to build knowledge and participate in advocacy sector development and training. As issues become more complex

advocates need to be able to access training and education in the very service systems where people with disability are facing barriers.

AFI also notes the policy priorities identified in the framework. These are largely concurrent with ours. Priority areas of focus for AFI include justice and pathways from prison, supporting people with disability in the pandemic, accessible and affordable housing, inclusive education, NDIS navigation and poverty.

This submission should be read in conjunction with the DANA submission and we endorse its key conclusions:

- All governments must be encouraged to step up and fulfil their responsibility to the citizens of their jurisdictions and agree to strong commitments to disability advocacy to ensure there is access to advocacy services for all people with disability across Australia. Implementing these commitments would go a long way towards the Safety, Rights and Justice Outcome Area of Australia's Disability Justice Strategy: 'the rights of people with disability are promoted, upheld and protected, and people with disability feel safe and enjoy equality before the law'.
- The current inadequate funding levels, opaque and inconsistent data collection and lack of sector support and investment means that a meaningful right to access to independent advocacy is not currently the reality for all Australians with disability. All federal and state and territory governments need to undertake to invest in Australia's disability advocacy sector, taking a collaborative and coordinated approach to funding and administration that provides real certainty for organisations in planning activities and retaining staff. In some areas the sector will need to be expanded and better connected to meet the needs of specific groups experiencing intersectional disadvantage and discrimination.
- Actions need to occur in close consultation with the sector, with governments listening and responding to input and feedback from advocacy organisations and the people with disability they support.

Please feel free to contact me to discuss our submission on [REDACTED] or

[REDACTED]

Regards

(sent by email)

[REDACTED]

Head of Policy  
Advocacy for Inclusion  
8 July 2022