



16 November 2023

## **Submission to the Department of Social Services re: A *Stronger, More Diverse and Independent Community Sector***

### **Introduction**

Inclusion Australia is the national Disability Representative Organisation representing the rights and interests of Australians with an intellectual disability and their families. Founded in 1954, our mission is to work to make sure people with an intellectual disability have the same opportunities as people without disability. Our policy team includes several policy officers with an intellectual disability and our policy and advocacy are directly shaped by people with an intellectual disability and their families.

Inclusion Australia's strength comes from our state members who use their combined experience and expertise to promote the inclusion of people with an intellectual disability. Our state members are:

- Developmental Disability Western Australia (DDWA) – Western Australia
- NSW Council for Intellectual Disability (CID) – New South Wales
- Parent to Parent (P2P) – Queensland
- South Australian Council on Intellectual Disability (SACID) – South Australia
- Speak Out Advocacy – Tasmania
- Victorian Advocacy League for Individuals with Disability (VALID) – Victoria

For more than two years we have had a Northern Territory branch of Inclusion Australia based in Darwin. Our work in the Northern Territory is informed by a Local Steering Group that includes representatives from advocacy and other territory-based organisations.

We are a proud member of the Australian Council of Social Service (ACOSS) and we work closely with the Disability Advocacy Network Australia (DANA). We strongly endorse these organisations' submissions in full.

We appreciate the opportunity to provide a submission on this important topic and welcome any further opportunity to discuss the issues raised in this submission in more detail.

## Summary of recommendations

1. Place people and communities who use community services at the centre of all planning, design, management and governance of the community sector
2. Remunerate and sustainably resource community sector organisations for ongoing engagement on public advisory groups, bodies and other authorities, and properly acknowledge and value expertise and capabilities
3. Ensure all funding arrangements reflect the full cost of service delivery and are determined in genuine partnership with the community sector
4. Increase standard contract lengths for community sector grants to at least five, and preferably seven years for most contracts, and 10 years for service delivery in remote Aboriginal and Torres Strait Islander communities, and ensure there are scheduled opportunities for government and community sector organisations to assess whether the contract adequately covers changing costs over time, including in the payment of indexation annually, to mitigate the financial risk to organisations.
5. Enable the Australian Bureau of Statistics to collect data on the full cost of social service provision and to separate community and healthcare sector data
6. Create inclusive and accessible ways for people with an intellectual disability to be included and valued in public advisory roles, including in reporting processes
7. Commit to systematically integrating inclusive practices—such as those designed in Inclusion Australia’s Towards Inclusive Practice project—as one mechanism for including people with an intellectual disability to engage with government in public advisory capacities.

## **Our feedback**

We strongly endorse both ACROSS and DANA's submissions to this consultation. There are some key recommendations we wish to reiterate in light of the specific challenges facing certain marginalised populations, such as people with an intellectual disability and their family members who we and our state members represent.

### **The need for specialist advocacy**

We are pleased that the Issues Paper acknowledges that different approaches to funding arrangements may be required to enable organisations to deliver services effectively to different cohorts, such as people with disability. We believe this is key to the effective and sustainable funding of Disability Representative Organisations (DROs), which play a substantial role in representing the rights and interests of people with disability across Australia.

Beyond funding arrangements, increased flexibility must also include:

- Ensuring our organisations maintain a diversified, inclusive workforce
- Allocating targeted resourcing for service design and delivery
- Increasing flexibility and length to funding arrangements that meet full service need, and that need is mapped through genuine consultation with sector organisations and service recipients
- Creating inclusive and accessible mechanisms for meaningful, ongoing engagement in government consultation or advisory processes.

We believe it is essential the Department recognises the importance of experienced, skilled, and trusted organisations to elevate the voice and participation of marginalised groups, so that policies and programs (i) are informed by lived experience, (ii) are effective and fit-for-purpose, and (iii) do not have unintended consequences.

People with an intellectual disability have few if any, ways of having their views and interests known by the government other than systemic advocacy. People with an intellectual disability are more likely to interact with multiple public systems, including specialist services, and face unique systemic barriers to an inclusive life—whether in terms of housing, employment, education, justice or health.

It is our firm conviction that governments need specialised systemic advocacy to dismantle those barriers and to help ensure policy and legislative changes are responsive and fit for purpose.

DROs with specialist expertise are central to this. Systemic advocacy for people with intellectual disability requires expertise that accounts for the need to develop leadership capacity and confidence with people who have been historically excluded and are still often extremely marginalised. It requires an understanding of specialised access and inclusion requirements, and a different way of working to ensure inclusion is genuine.

It involves mapping existing and emerging trends of issues with people who are often hard for governments to reach, providing direct assistance to people with complex support needs

to become involved, and delivering unique analyses to government that corporate consultants cannot offer.

In our experience the voices and experiences of people with an intellectual disability, particularly those with complex needs, can be forgotten in cross-disability DRO environments. People with an intellectual disability and their family members experience unique systemic barriers and possess a high level of expertise through their lived experience. If supported through specialist advocacy organisations to participate in and lead systemic advocacy work, people with an intellectual disability and their family members can make a strong contribution to public policy and add immense value and efficacy to systemic work.

It is essential that the specific work of DROs is recognised by government in the context of the community sector, and are funded, consulted and partnered with accordingly.

### **Community-centred design and effective representation**

We strongly agree that to create meaningful working partnerships between government and the community services sector, the people and communities who use those services must be at the centre of all planning, design, management, and governance of the community sector.

We strongly agree with ACROSS' recommendation to:

“Create an ongoing commitment from Government to appropriately remunerate and resource community sector organisations for ongoing engagement on public advisory groups, bodies and other authorities, in order to properly acknowledge and value expertise and capabilities.”

This is crucial to create more meaningful working partnerships between government and the community sector. For us, this also means creating inclusive and accessible ways for people with an intellectual disability to be included and valued in public advisory roles.

When the Department designs its package of recommendations to government, it must acknowledge the barriers that currently exist that prevent people with an intellectual disability from sharing their expertise with government.<sup>1</sup>

We also strongly recommend the government strengthen its capabilities around inclusive engagement. In the long run, this means committing to systematic integration of inclusive practices—such as those articulated through our suite of tailored resources, the [Towards Inclusive Practice](#)<sup>2</sup> project. This will educate and inform government processes in general, and specifically support governments' work creating more accessible mechanisms for people with an intellectual disability to engage with government in public advisory capacities.

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<sup>1</sup> See, for example, our introductory guide for managers and policy makers engaging with people with an intellectual disability, available at: <https://www.inclusionaustralia.org.au/wp-content/uploads/2023/04/Guide-to-Inclusion-for-Policy-Makers.pdf>.

<sup>2</sup> The Towards Inclusive Practice project was funded by the Department of Social Services to provide practical advice to government on how to be more inclusive of people with an intellectual disability.

## **Funding that addresses real community need**

The process for determining funding arrangements for the community sector must reflect the full cost of service delivery, including the demand for services across the community. We agree with ACOSS that the Australian Bureau of Statistics should collect data on the full cost of social service provision and that it should separate data from the community sector from healthcare to provide a greater accuracy of sector-specific costs. These data should be used to inform planning for sector funding.

Additionally, determining the full cost of service delivery must be done in genuine partnership with the community sector—including with the recipients of community services, as well as those who *would be* service recipients if access was available to them.

ACOSS has recommended a comprehensive service needs analysis and demand mapping exercise to be conducted with the community sector and communities across Australia. We agree this detailed analysis, which places people and communities at its centre, is necessary to determine the full cost of service delivery and accurate arrangements for funding amount and length.

ACOSS has also recommended increasing standard contract lengths for community sector grants to at least five, and preferably seven years for most contracts, and 10 years for service delivery in remote Aboriginal and Torres Strait Islander communities. We endorse this recommendation in full and believe this would help to alleviate some of the impacts of funding uncertainty felt within the sector.

Many disability advocacy and peer support organisations, including Inclusion Australia and our members, are often reliant—in some cases solely—on ILC grants to fund their work. The insecurity and uncertainty of this can have widespread impacts, especially given that once the current three-year ILC funding finishes, there is no guarantee of anything further unless the organisation can formulate a new, innovative project and apply for another grant. This means that important work is often ceased after a grant period, and that time is spent developing new ideas to meet ongoing, established need. It is also dependent on the structure of grants programs, which often changes in line with changing government priorities.

Further, peer support and information services—which are vital to the effective functioning of other service systems—are not currently funded apart from through the ILC and have been neglected since the rollout of the NDIS.

This funding precarity puts enormous strains on the community workforce and takes away organisational capacity which is sorely needed for other aspects of service delivery. It contributes to workforce turnover and burnout and ultimately means that organisations often cannot effectively meet the full service needs of their communities over time.

In addition, developing the capacity of people with an intellectual disability takes time, planning and significant resources from both state and national organisations. This is not only necessary to meet the support needs of the people we work with and represent, but also to build trusting relationships in which people—who have often experienced significant marginalisation, exclusion, trauma and even violence, abuse, neglect or exploitation—feel safe and supported to share their experiences and build their skills in systemic advocacy and participate meaningfully in government consultation processes.

**We also know that involving people with an intellectual disability and their families and allies as early as possible in government planning processes leads to better solutions, more meaningful outcomes, and with more efficient spending for government.**

Longer and more flexible funding arrangements are therefore necessary given the time and resourcing required to do this work, as well as to support the ongoing broadening and maintaining of networks of people with an intellectual disability and their families.

In this vein, we also strongly agree with ACOSS' recommendation that during the life of longer-term contracts (e.g. 5+ years), there must be scheduled opportunities for government and community sector organisations to assess whether the contract adequately covers changing costs over time, including in the payment of indexation annually, to mitigate the financial risk to organisations.