# Building a stronger foundation

## VCOSS Submission to the National Disability Advocacy Framework 2022-2025

**July 2022**

The Victorian Council of Social Service is the peak body for Victoria’s social and community sector, and the state’s premier social advocacy body.

We work towards a Victoria free from poverty and disadvantage, where all people and communities are supported to thrive. We champion wellbeing and inclusive growth.

VCOSS supports and advocates on behalf of its members. We respect the unique perspectives of people with experience of poverty or inequality, and seek to strengthen and elevate their voices.

VCOSS is independent and impartial.

We are not affiliated with any political party.

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VCOSS acknowledges the Traditional Owners of Country and pays respects to Elders past and present, and to emerging leaders.

We conduct our business on sovereign, unceded Aboriginal land.

This document was prepared on the lands of the Kulin Nation.

# Contents

# Executive summary

The Victorian Council of Social Service (VCOSS) welcomes the opportunity to provide input to the development of the National Disability Advocacy Framework 2022-2025.

VCOSS is the peak body for social and community services in Victoria. Our members include charities, peak bodies, frontline service groups, advocacy organisations and individuals passionate about the development of a sustainable, fair, and equitable society.

VCOSS is also the auspice organisation for the Disability Advocacy Resource Unit (DARU), which is jointly governed by VCOSS and Disability Advocacy Victoria (DAV). DARU, funded by the Victorian Government through the Office for Disability, supports Victoria's 28 disability advocacy organisations with information, learning and development, and projects that strengthen the capacity of the state-funded sector.  DARU organises forums that enable the sector to have a coordinated approach to issues of concern, and VCOSS provides complementary support by assisting the sector to produce collaborative systemic advocacy – for example, joint policy submissions to government, such as this submission on the National Disability Advocacy Framework 2022 – 2025.

This submission is made by VCOSS on behalf of Victorian disability advocacy organisations who are part of our 'Empowered Lives' network.

It is particularly informed by the insights and experiences of the following Empowered Lives members:

- AMIDA
- Blind Citizens Australia
- Barwon Disability Resource Council
- Disability Advocacy Network Australia
- Disability Advocacy Victoria
- Melbourne East Disability Advocacy
- Rights Information and Advocacy Centre
- Youth Disability Advocacy Service.

Victorian organisations have a strategic interest in the next National Disability Advocacy Framework given that:

- The Framework is a shared commitment to disability advocacy between the Commonwealth, state, and territory governments to ensure there is access to advocacy services for all people with disabilities nation-wide. Our members welcome this commitment but note that the current state of play is that access to advocacy – a key safeguard – is not currently assured. This submission identifies several areas that require Commonwealth and State investment and/or national reform in order to deliver on the Framework's espoused commitment.
- The 2022-25 Framework will be a key enabler for the implementation of Australia's Disability Strategy 2021-2031.

VCOSS agrees that there is a need to review and revise the National Disability Advocacy Framework. This consultation process provides an opportunity to update the framework to be more specific, ambitious, and reflective of the continually evolving disability environment.

This submission is framed around the following five guiding questions:

- Do you believe the new NDAF encompasses your vision of advocacy? If not, what changes are required?
- Are the principles of the NDAF appropriate for guiding the delivery of advocacy for people with disability in a changing disability environment, including in the context of the NDIS? If not, what changes are required?
- Are the outcomes of the NDAF clear and achievable? Should different ones be included? If so, what should be included?
- Are the responsibilities, reform, and policy directions of the NDAF relevant or should different ones be included?
- Does the NDAF identify what is needed in the current and future disability environment? If not, what changes are required?

# Vision

**Recommendations**

Strengthen language in the objective of the framework to reflect the right to effective disability advocacy.

Acknowledge the diversity of advocacy approaches by referring to and adding specific definitions for family, citizen, and legal advocacy.

Recognise the value of self-advocacy groups and demonstrate a commitment to ongoing funding for these groups.

Create the conditions for governments to deliver on the promise of the new Framework by securing a commitment by the Commonwealth, States and Territories to:

- Enshrine the right to advocacy in relevant legislation.

- Provide adequate and secure Commonwealth, State and Territory funding for disability advocacy organisations, that enables agencies to meet advocacy demand and retain staff.

- Take national action on two key systemic drivers of demand: problems with the NDIS and problems with the Disability Support pension.

VCOSS is pleased that the proposed framework is underpinned by a person-centered and rights-based approach whereby the rights of people with disability and their individual needs and aspirations are reflected in policy and program design.

However, to fully encapsulate our vision of advocacy, the framework should be amended to reflect the following themes.

## The right to advocacy

The objective of the framework should be strengthened to state that people with disability have the right to disability advocacy if they choose, rather than simply stating people with disability have access to advocacy.

This should be backed by legislative measures. Through the development of the framework, the Commonwealth should work with the States and Territories to secure a multi-lateral agreement to embed the right to advocacy in relevant Australian laws. This will make the framework more robust and provides an opportunity to strengthen its person-centered and rights-focused approach.

A multi-lateral agreement – rather than bespoke bi-lateral agreements – is important.  The National Disability Advocacy Framework presents a structure for Commonwealth, state, and territory governments to align their advocacy services and standards to improve outcomes and access for people with disability, irrespective of which jurisdiction they live in.

Enshrining the right to disability advocacy would be a tangible expression of Australian governments' shared commitment to truly protecting the rights of people with disability.

This move would be consistent with the United Nations Convention on the Rights of Persons with Disabilities, which Australia ratified in 2008.

Subsection 1 of article 16 of the United Nations *Convention on the Rights of Persons with Disabilities* says that:

> *"States Parties shall take all appropriate legislative, administrative, social, educational and other measures to protect persons with disabilities, both within and outside the home, from all forms of exploitation, violence and abuse, including their gender-based aspects."*

## Long-term funding for disability advocacy

Disability advocacy plays a unique role in empowering people with disability, as well as their families and carers, to assert their human and legal rights, communicate their needs and then meet them[1]. Advocates also play a vital role in identifying and reporting systemic issues and preventing future cases of violence, abuse, or neglect.

However, the advocacy sector is struggling to respond to the needs of every person with a disability who requests – or is referred for – advocacy, as it is not adequately resourced to meet growing demand and deliver quality services to all those who require advocacy. A fully funded disability advocacy sector that can provide timely and effective support is a core component of our vision for advocacy.

The 'Responsibilities, Reform and Policy Directions' section of the draft framework **does** include a commitment to *"Ensuring the funding of disability advocacy is transparent, equitable, and accountable, and geographical coverage and service gaps are identified and addressed"*. This is a good start, however, there needs to be explicit recognition of the need for the sector to be **adequately** funded to meet demand and to satisfactorily resolve matters. VCOSS notes that there have been projects in several jurisdictions that seek to improve access to disability advocacy and provide a better "client experience" by examining opportunities to improve intake to disability advocacy services. While there is always room for enhancement to processes, and these projects are welcome, VCOSS's position is that the principal solution to improving access is to provide the sector with adequate and secure funding.

A VCOSS-commissioned review of National Disability Advocacy Program (NDAP) and Victorian Disability Advocacy Program (VDAP) funded organisations in Victoria found that, in order for the disability advocacy sector to perform its essential role in safeguarding people's rights and overcoming barriers to their inclusion and participation in the community, governments must: strengthen the sector's foundations by providing an increased level of core funding that reflects the quantum of demand and complexity of cases; ensure annual funding indexation is sufficient to address cost increases, particularly in a high-inflation environment; and provide greater funding certainty via longer-term contracts (VCOSS advocates for seven years, as recommended by the Productivity Commission review of funded community services).

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[1] Disability Advocacy Resource Unit (DARU), What is disability advocacy? https://www.daru.org.au/wp/wp-content/uploads/2011/12/What-is-disability-advocacy_final-June-2016.pdf

These measures would also deliver productivity dividends – for example, better long-term planning, less staff turnover, a reduction in funded vacancies in the sector and greater organisational investment in workforce development. VCOSS also advocates for additional resources for innovation and partnerships, to enable healthy growth and future success for the sector as part of our vision[2].

Research undertaken for VCOSS has found that demand for disability advocacy has increased significantly since the introduction of the NDIS. NDIS-related issues are more time intensive and complex than other requests for advocacy and many advocacy organisations report that under current funding arrangements, they lack the resources needed to meet this increased demand[3].

This research also highlighted that some resource-constrained advocacy organisations are, in some circumstances, having to shift focus to the provision of information and one-off advice, rather than providing "true advocacy".

VCOSS observes that, while there is a clear role for information services (sometimes referred to in the sector as "little advocacy") – and this kind of intervention can support self-advocacy – it is a distinctly different type of support or service and, for people with disability who require individual advocacy, this kind of substitution can lead to lower levels of satisfaction and poorer outcomes for people with disability who need a comprehensive advocacy response.

VCOSS notes that this is not something that sits comfortably with the sector – it has been concerning and stressful for Boards, executive leaders, and frontline advocates, and is compounding the problem of staff burnout. When organisations provide "little advocacy", it is often seen as a "forced choice" – that is, they are only doing so because the alternative is to leave people to languish on a waiting list for a comprehensive individual advocacy response or turn people away without a service at all.

In regard to information provision (or "little advocacy"), VCOSS also notes that, in the transition to the NDIS, there are policy and funding gaps in relation to the information services part of the broader advocacy eco-system, and this connects with our concerns about the lack of appropriate recognition and funding for self-advocacy groups and other user-led communities, such as parent and carer groups. The new National Disability

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[2] VCOSS, State of Inclusion: VCOSS submission to the Victorian State Disability Plan 2021-2024, 2020, p.50
[3] ibid. p. 8

Advocacy Framework provides an opportunity to affirm the role and value of self-advocacy, and to enable a new look at the broader policy and funding settings. VCOSS notes that the main source of funding for these groups is the ILC stream of the NDIS, however, this funding stream is non-recurrent, focused on discrete one-off projects and is structured as a competitive grants process that many of our members and partners experience as having high barriers to entry. It does not support the sustainability of small, self-advocacy groups.

VCOSS has also identified that crisis-driven demand for NDIS-related advocacy has put a squeeze on disability advocacy organisations' capacity to meet demand for advocacy related to mainstream services and systems, such as education, health, housing, justice and transport.

Further, we note that while services in Victoria have welcomed injections of 'boost funding' from our State Government in recent years, in recognition of the exponential growth in demand, including during COVID-19, the distribution of funding does not fall evenly, with larger organisations more likely to benefit the most[4]. Additionally, the drip-fed and short-term nature of this funding (and government funding generally) makes it difficult for organisations to deliver sustainable services and retain experienced staff.

## Diversity of approaches to advocacy

VCOSS is concerned that the framework is orienting away from recognising the diversity of approaches to advocacy. It is important that the current and future revisions of the framework do not dilute and minimise different approaches to advocacy in the sector. Just as the framework recognises individual, systemic, and self-advocacy, the framework should be amended to recognise and include specific reference to and definitions of family, legal and citizen advocacy as follows:

- *Family advocacy*: where parents and family members advocate on behalf of the person with disability for a particular issue[5].
- *Citizen advocacy*: where community volunteers advocate for a person with disability, such as an intellectual disability, over the long-term, supported by a Citizen Advocacy organisation[6].

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[4] VCOSS, State of Inclusion: VCOSS submission to the Victorian State Disability Plan 2021-2024, 2020, p.6

[5] National Disability Advocacy Program, Background https://www.dss.gov.au/our-responsibilities/disability-and-carers

[6] Disability Advocacy Resource Unit (DARU), What is disability advocacy? https://www.daru.org.au/wp/wp-content/uploads/2011/12/What-is-disability-advocacy_final-June-2016.pdf

- *Legal advocacy*: where a lawyer provides legal representation in the justice system, pursues positive changes to legislation, or gives legal advice to people with disability about discrimination and human rights[7].

The framework also needs to recognise that self-advocacy groups are vital to the advocacy eco-system and commit governments to resourcing and funding these groups accordingly.

We also note that the current definitions of advocacy in the framework lack nuance in that they tend to only recognise individuals seeking out advocacy instead of also recognising the important parallel work of self-advocacy groups. Research undertaken for VCOSS has found that these groups are a major source of information and advice and harness social connection and community partnership to build and maintain significant networks that work on local, state, and national issues of importance. This empowers people with disability by supporting them to build confidence and learn self-advocacy skills.

VCOSS and Empowered Lives members are concerned that the framework fails to explicitly recognise self-advocacy groups and their contribution to advocacy. The Framework’s silence on self-advocacy appears out of step with the interim report of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, which acknowledged the essential functions of self-advocacy and family advocacy in promoting rights awareness, greater autonomy and the recognition and reporting of abuse in group home settings:

> *“Independent advocacy and self-advocacy emerged as key factors in promoting the safety of people with disability living in group homes. If people with disability are aware of their rights and how to exercise those rights, they are more likely to recognise and report threats to their safety or wellbeing. The safety of residents is further protected when family members or other trusted supporters advocate on their behalf.”*[8]

As such, it is important the framework be changed to protect and steward the advancement of these groups by highlighting their importance and acknowledging the role of Australian governments in supporting access through the provision of adequate and sustained funding.

The framework also tends to orientate towards, and focus on, individual advocacy and does not sufficiently recognise systemic advocacy. Individual advocacy and systemic advocacy

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[7] Disability Advocacy Resource Unit (DARU), What is disability advocacy? https://www.daru.org.au/wp/wp-content/uploads/2011/12/What-is-disability-advocacy_final-June-2016.pdf

[8] Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, Interim Report, October 2020, p.253-354

are inextricably linked – systemic advocacy often stems from patterns or trends in individual advocacy cases. Systemic advocacy is vital to achieving purposeful and positive long-term change to problematic systems – systemic advocacy ‘wins’, such as changes to legislation, regulation, policies, or practice, can ultimately drive down demand for individual advocacy. As such, our vision for advocacy, which we wish to see reflected in the framework, includes well-resourced and valued systemic advocacy.

# Principles

**Recommendations**

Extend the principle of ‘Access to Supports’ to acknowledge the inherent rights of a person with disability to have access to decision support.

Include an additional principle around monitoring and addressing systemic issues.

VCOSS supports the principles of the National Disability Advocacy Framework as a whole and is pleased to see that the principle of justice confirms that disability advocacy is now inclusive of legal advice and representation. This is a timely and welcome change as data from disability advocacy organisations indicate that over four years from June 2012 to June 2016, requests for assistance with legal issues more than doubled[9].

Another positive change from the original framework is the shift in direction from the concept of ‘best interest’ to ‘will and preference’ under the principle of Access to Supports. Victoria has now laid legislative foundations to protect the inherent right of a person to make their own life decisions under the Guardianship and Administrative Act 2019. The Access to Supports principle should be extended to include an acknowledgment of the inherent rights of a person with a disability to have access to decision support within all statutory systems that provide health, legal, educational, and other essential services[10].

An additional principle that we would like added to the framework is around the monitoring and addressing of systemic issues. The disability advocacy sector observes that the lived experience of people with disabilities has been the subject of many reviews and inquiries – from the current national Royal Commission into Violence, Abuse, Neglect and Exploitation of People with a Disability, through to Parliamentary inquiries into people's experience of specific systems, and investigations conducted by statutory bodies, such as Ombudsmen, Commissioners and Auditors-General. Consistently, these inquiries and reviews occur in

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[9] Disability Advocacy Resource Unit (DARU), Disability Advocacy by the numbers, 2017, p.3

[10] KF Consulting, Disability advocacy and decision-support, 2021, p.11

isolation from each other and are dealt with in a siloed way by different agencies and levels of government.

Additionally, disability advocacy organisations' work on systemic advocacy is also siloed and not well known, because the sector has no formal mechanism for information sharing and no backbone support for collaboration on systemic issues.

The new principle proposed by VCOSS should acknowledge the need for a standardised system of recording systemic issues faced by people with disability so that they can be tackled in a more cohesive and effective manner. It is important that this reporting does not create a burden for the sector that outweighs the benefits of information sharing and applied learning. To this end, the framework should recognise that additional funding and resourcing would be required in order to monitor and record progress on systemic issues.

# Outcomes

**Recommendations**

Add a sub-section that focusses on how outcomes will be measured, reported and evaluated.

Recognise the need for commitment to fund and appropriately resource specialist individual advocacy services for Aboriginal and Torres Strait Islander people with disability and culturally and linguistically diverse (CALD) communities.

Include an outcome about building and increasing the capacity of people with disabilities to self-advocate and represent themselves.

Remove the word *'increased'* from outcome two.

Replace the word *'increased'* with 'broad' for outcome eleven.

Recognise the need to appropriately remunerate people with disabilities who are expressing their views and playing an active role in improving services and systems.

The outcomes presented in the framework are theoretically relevant and comprehensive but, as highlighted through this submission, it is only through continued investment in disability advocacy and self-advocacy, and a growing and skilled workforce that these outcomes will be truly achievable.

For the outcomes to be meaningful, more clarity is needed on how these outcomes will be measured, reported, and evaluated. The framework would benefit from an additional section that presents a clear plan for evaluating the outcomes and outline how Australian government's plan to support the achievement of these outcomes.

VCOSS is pleased to see the proposed framework include two outcomes that focus on Aboriginal and Torres Strait Islander people with disability and culturally and linguistically diverse (CALD) communities having access to culturally and linguistically appropriate, and culturally safe disability advocacy. However, it is important to recognise that these outcomes will only be achieved through a commitment in the proposed framework to fund and appropriately resource specialist individual advocacy services for these groups.

In recognition of the importance of self-advocacy, the framework needs to include an outcome focused on building and increasing the capacity of people with disabilities to self-advocate and represent themselves.

Additionally, the language of certain outcomes needs to be changed as below:

Outcome two should be changed to:

> *People with disability enjoy choice, control, and wellbeing, exercise their right to make decisions, are involved in all decision-making processes that affect their lives and receive the support they need to make those decisions.*

The word ‘increased’ should be removed before the words ‘choice, control and wellbeing’. We do not support the use of the word ‘increased’ in this specific context, because we fear it inadvertently (negatively) acts as a qualifier.

Additionally, we advocate for Outcome eleven to be changed to:

> *There is broad community awareness of barriers to people with disability, the stigma associated with disability and the presence and value of advocacy supports.*

We prefer the word ‘increased’ is replaced with ‘broad’.

Outcome ten looks at people with disability as playing an active role in all aspects of the development, delivery and evaluation of disability and broader government policies, programs and services that impact them.  We agree that people with disability should be encouraged and supported to participate in the decision-making process – however, Outcome ten needs to be expanded to include a commitment to fairly remunerate people with disability for their time.

# Responsibilities, reform and policy directions

**Recommendations**

Include a commitment to

- Broadly publish data publicly so that data can be utilised to affect real and tangible change.

- Implement more nuanced and user-friendly reporting systems at state and national levels.

-Develop a shared reporting mechanism that acts as a central source of data and insights on outcomes relevant to the framework.

Include tangible plans to support development of the disability support workforce.

Add the word "adequate" in regard to the current statement about funding (i.e., the amended wording proposed by VCOSS is "Ensuring the funding of disability advocacy is adequate, transparent, equitable and accountable, and geographical coverage and services gaps are identified and addressed.")

To be meaningful, reform and policy directions in the framework need to be underpinned by strong commitment to increased and ongoing investment into the disability advocacy sector.

## Building awareness of disability advocacy and the rights of people with disability

VCOSS supports the proposed framework's commitment to build awareness across the disability sector and the broader community of the rights of people with disability and the importance of disability advocacy. It is important that the availability and types of advocacy are well promoted throughout the community. The first step towards accessing advocacy services is the knowledge that there are services available to engage with.

Additionally, disability rights awareness should be prioritised as a key feature in regular training for not only the disability sector, but staff across wider mainstream services and systems.

## Reporting & Data

The framework states that the Commonwealth, state, and territory governments are committing to the collection, use, and reporting of evidence-based data for administration and planning of disability advocacy and improvement of services systems. VCOSS and Empowered Lives members raised questions around how this data will be shared. In their experience, the quantitative or qualitative data arising from these reports is rarely published or publicised, and we do not know how it is used by funders. The framework could be improved to include a commitment to sharing this data publicly so that the data can be utilised to affect real and tangible change.

The framework should also be amended to highlight a commitment to implementing more nuanced and user-friendly reporting systems that are reflective of the complex environment disability advocates are operating in. For example, in Victoria, disability advocacy organisations funded by the Victorian Disability Advocacy Program report that data collection is often a repetitive, onerous, and time-consuming process. Smaller disability advocacy organisations, already struggling with increased demand for advocacy services, find it especially difficult to keep on top of the administrative burden of reporting[11].

Given the intersecting nature of many of the issues people with disabilities face, advocacy categories in reporting systems also need to be extended to include a wider remit of issues.

For example, in Victoria, the Victorian Disability Advocacy Program’s Quarterly Data Collection (QDC) form that has been in place until recently asks organisations to count the number of people provided with advocacy support on a number of advocacy issues, but this type of data capture does not provide a meaningful picture. For example, VDAP-funded services have not been able to show through data collection and reporting the complexity of cases – workers providing data have not been able to reflect the amount of work required if

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[11] Disability Advocacy Resource Unit (DARU), Disability Advocacy by the numbers: Data Integrity Supplementary Report, 2017, p.5

a person comes to a service with multiple advocacy issues, as only one presenting issue can be recorded.

More nuanced reporting systems should allow advocates to tick multiple boxes when dealing with intersecting and immerging issues.

VCOSS and Empowered Lives members also raised concerns that national and state reporting requirements are not complementary of each other. VCOSS recommends the framework be amended to include the development of a shared reporting mechanism that can act as a central source of data and insights on outcomes relevant to the framework. This would allow for deeper and more effective outcomes measurement.

## Investment into the disability workforce

A lack of career pathways, negligible opportunities for promotion and organisations' limited capacity to invest in the professional development of their staff[12] add to the challenge of retaining workers in the disability advocacy sector[13]. The framework stipulates a commitment from the Commonwealth, state, and territory governments to work together and support the capacity building of disability advocates.

This revision of the framework presents a timely opportunity for governments to not only 'support capacity building' but take a leadership role in significantly investing in the resourcing and nurturing of a strong disability workforce. The framework should articulate clear reform priorities in this area including the setting up and funding of a formal schedule for recognised training and professional development courses year on year.

This is critical to ensuring the growth of a thriving disability support workforce that is qualified and effective in delivering quality advocacy services.

VCOSS notes that in regard to professional development, the Victorian Government does provide support to VDAP-funded disability advocacy organisations via the Disability Advocacy Resource Unit (auspiced at VCOSS) and to self-advocacy groups via the Self Advocacy Resource Unit. VCOSS observes that the current funding arrangement enables DARU to be highly responsive to the sector's needs for non-accredited training. Should Australian governments take up VCOSS's proposal to establish and fund a formal schedule

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[12] KF Consulting, Disability advocacy and decision-support, 2021, p.8
[13] Empowered Lives, empoweredlives.vcoss.org.au p. 66

for recognised training and professional development courses annually, DARU and SARU would be ready-made vehicles for this work. VCOSS also reflects that, given the espoused commitment by Australian governments, via this revised national framework, to ensuring Australians with disabilities who need advocacy have access to advocacy no matter where they live, the Victorian resource unit model could be a best-practice model that could be adopted in jurisdictions where this supporting infrastructure is not already in place.

# The current and future disability environment

**Recommendations**

Establish disability advocacy as having a formal role in the disability services sector.

Commit to adequately funding advocacy across Australia.

State and Commonwealth governments should continue to have joint responsibility in funding advocacy programs.

A strong state/territory-based sector (state-based disability advocacy services and programs and a state-based sector) should be retained alongside a national sector and national funding steam (NDAP).

The framework and disability policy reform should be reflective and responsive to the advocacy needs of different diagnostic-specific groups.

## Strengthen the position of disability advocacy

One area in which the framework misses the opportunity to identify what is needed in the current and future disability environment, is the need for disability advocacy to hold a formal role and position within the wider disability services sector. The framework tends to treat disability advocacy as a siloed area within the wider disability services eco-system, and there appears to be no provision in the framework for advocates to have links to and interactions with regulators and other important bodies. It is important the framework formally position disability advocacy within the wider system so that there is formal recognition of the integral role advocates play.

The framework should commit to recognising and respecting disability advocates by giving them a formal role in the sector through either legislation or the State Disability Plan.

## Advocacy should be funded across Australia

Currently, the amount and type of advocacy available to people with disability differs between states and territories. It is important that all jurisdictions are adequately resourced so that all Australians with a disability have access to disability advocacy, including the different types of advocacy, no matter where they live.

VCOSS notes the need for funding to reflect the realities of demand and unmet need and the complexity and duration of advocacy cases.  Funding should also reflect the need for comprehensive, timely and quality support for NDIS and non-NDIS issues, including adequate funding for advocacy organisations to support people with disabilities bringing matters related to access to justice, health, education, housing and transport, and other areas such as child and family services, Child Protection, and out-of-home care.

## Advocacy should remain the joint responsibility of State and Commonwealth Governments

The framework rightfully identifies that state and Commonwealth governments should continue to have joint responsibility in funding advocacy programs. This is needed in both the current and future disability environment. A combined funding approach will allow for a greater level of oversight and more stable and complete coverage of services. It also gives disability advocacy the recognition it needs to be best utilised by people with disability as well as a greater level of independence.

On this note, while the framework does make reference to the independent nature of advocacy, the framework could do more to reiterate and recognise the importance of advocacy services remaining independent. Independence is a core principle of disability advocacy and its importance should be rightfully acknowledged within the framework.

## Recognise the unique needs of different diagnostic groups

Recent NDIS reforms have enabled us to get a clearer picture of different diagnostic groups within our communities and what unique needs these groups may have. It is important to ensure the framework and relating disability policy reform is reflective and responsive to the advocacy needs of different diagnostic specific groups such as people who have complex communication needs, autism, or multiple disabilities.

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