

26 October 2006

Anthony Bartolo
Department of Families, Community Services and Indigenous Affairs
GPO Box 9820
SYDNEY NSW 2001

Dear Anthony,

I am writing in response to the Enhancing the National Disability Advocacy Program Consultation Paper and the Final Report of the Evaluation of the Program. I have 15 years involvement in advocacy organisations throughout Australia in both paid and unpaid capacities. Additionally I have been involved in the establishment of new advocacy organisations and the evaluation of existing advocacy groups. My expertise and long history with advocacy in Australia means I am able to provide sensible advice to the Government around advocacy at this time.

It is imperative that the Australian Government is fully aware that the evaluation of the NDAP by Social Options is extremely flawed and demonstrates an almost non-existent understanding of advocacy. *For example the evaluation claims that advocacy agencies should be provided with principles. Given that advocacy principles have been around since the introduction of advocacy and discussed in every report or paper written about advocacy it is extremely distressing that they have been ignored by these consultants.*

Given that the report is not accurate it has resulted in proposals outlined in the Consultation Paper which are equally flawed and therefore not in the best interests of people with disability who need good, strong, independent advocacy. *For example the Consultation Paper provides statistics which attempt to prove that a disproportionate amount of money goes to systems advocacy. However the statistics when taking into account the different forms of individual advocacy prove that currently the NDAP is spending 80% on individual advocacy and 20% on systems. This distribution is actually reasonable and there is no reason to ask for redistribution.*

Therefore it is in the Government's interest to destroy the Evaluation by Social Options and the Consultation Paper and reestablish good relationships directly with existing advocacy organisations in order to work together towards a stronger advocacy program in Australia.

Will the reform plan help to improve the effectiveness and efficiency of the program?

No. It will weaken advocacy, destroy existing relationships, and create an "unmet needs" list that government will be having to deal with for decades to come. There will never be enough advocacy for individuals which is why there is a need for a diversity of advocacy models including those which look at advocacy for groups of people and the involvement of unpaid advocates.

The current diversity of advocacy responses enable a wide range of potential advocates for vulnerable people. Just as there is not one response to the housing needs of people there should not be one response offered as a means of protecting and promoting the welfare and rights of people with disabilities. If we are sincere in our efforts to ensure that people are safe and have decent lives then we must support people with disabilities, family members and citizens to take on individual advocacy roles. But that is not enough, we also need to ensure that the issues that people have in common with the structures, practices and attitudes of society and systems are advocated around at the systems level.

The cornerstone of effective advocacy is independence. This is so that the loyalty of the advocate is with the person/people with disability. Advocacy organisations and the NDAP need to ensure that this cornerstone and key principle is at the core of any decisions made about the future of the program. Therefore the proposals to combine different forms of advocacy, introduce standardised procedures, one stop shops, peak bodies doing advocacy, referral model, a hotline and external priority setting will lead to great compromises and therefore greater conflicts of interest for advocacy.

One possible improvement for the NDAP which increases the independence of funded advocacy is the move to the Attorney General's Department. This is consistent with minimising conflicts of interest which is part of the definition of advocacy.

Is the Government and Department aware of the efforts advocacy groups (particularly in Queensland) have made to work with both the State and the Commonwealth to develop ways of measuring quality and reporting of activities? Additionally advocacy organisations in Queensland have been developed out of an advocacy development plan and are part of a Combined Advocacy Groups Queensland which meets regularly with each other and with government. Advocacy groups have bent over backwards to ensure that they are providing principled advocacy. I personally have been involved in evaluating a number of advocacy programs and have been evaluated while working for advocacy organisations an additional three times. All these evaluations have been initiated and in many cases paid for by the advocacy organisations themselves. Citizen Advocacy has its own evaluation tool and Combined Advocacy Groups Queensland have developed a guide for all forms of advocacy.

Combined Advocacy Groups Queensland recently worked with the state government to develop performance indicators for the state funded advocacy groups. This was not difficult as advocacy groups wish to remain accountable and are more than willing to be transparent about their practices. There is a total lack of acknowledgement in the Evaluation or Consultation Paper of this enormous contribution to the quality of advocacy that organisations and individuals have given. Neither have there been any lessons drawn from this expertise evidenced in the proposals.

What other things can be done?

1. First and foremost the Government must NOT introduce the proposals as outlined in the Consultation Paper. The Government would also improve their standing with the community if the Social Options Evaluation was acknowledged as flawed and unhelpful.
2. The Department needs to talk directly with advocacy organisations and work together with them and the state to develop a framework for advocacy based on advocacy principles.

3. Combined Advocacy Groups Queensland should be invited to share how they work so that other states who wish to develop a similar model can be encouraged to do so.
4. Leaders within the NDAP need to have a deep understanding of advocacy, including a history of the advocacy movement in Australia, as well as connections to people with disabilities. Selection criteria for all new positions within the NDAP need to include demonstration of advocacy knowledge and community members need to be involved in the selection of senior staff.
5. More funding needs to be provided to ensure that state plans, having been developed with advocacy organisations and the Dept, are able to be carried out.
6. Advocacy evaluations initiated by organisations need to be encouraged and supported. This self imposed culture of continuous improvement should be celebrated as more effective than minimum standards could ever be.
7. Gatherings, either state or federal, of advocacy groups should be funded as a mechanism for sharing of information and best practice.

Are the refinements to the Disability Services Standards and new Key Performance Indicators right?

The difficulty with any form of standards and quality assurance systems is that they are generalised and based on minimum standards. Therefore it doesn't really tell us whether the advocacy is "quality". The only way to demonstrate quality would be to have performance indicators related to advocacy principles.

I recommend the NDAP use a similar process to the one used by Disability Services Queensland and Combined Advocacy Groups Queensland to develop KPIs for state standards, which involved good old fashioned talking together and working out what made the most sense.

As I am responding as an individual I do not have the time to write about each issue in the Consultation Paper and Evaluation Report. However I would be more than happy to speak with you and anyone within the NDAP or Commonwealth Government to provide greater detail.

The positive future of independent advocacy is at grave risk if the proposals go ahead. I urge you to make the strongest recommendation possible to start again by talking with those who have the history, knowledge and expertise in advocacy to make sound recommendations.

Yours sincerely,

Sandra Kalms