



people with
disabilities
western
australia

IDAP Submission

People with Disabilities WA

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Foreword

This submission to the federal [Department of Health, Disability and Ageing](#)'s comments on the proposed replacement of the Australian federal [National Disability Advocacy Program](#) established 1980s, with the national Individual Advocacy program in 2026.

The submission is presented by [People with Disabilities WA](#) and draws on our staff's strong professional and lived experiences as advocates and people with disability living in Australia and Western Australia.

It was considered collaboratively by PWdWA and Sussex Street Community Law Service and its lived experience advocate and lawyer Dr Rita Kleinfeld-Fowell, Head of Disability Practice, and Sussex Street CEO, Zoe O'Neill. We have provided our response separately but in tandem to maintain our communities' respective individual and distinct voices.

People with Disabilities WA has been running for 45 years and has been funded for its individual and systemic advocacy efforts for many years under the NDAP national program. This allows the busy disability advocates to work in the federal social services space, commenting on and helping people advocate for improvements to the services they receive under initiatives such as Services Australia's [Centrelink program](#) and the National Disability Insurance Agency–managed [National Disability Insurance Scheme](#).

PWdWA staff and board members, advocates, clients and members have years of practice in navigating community life in Australia and abroad for people with disabilities. Our authors draw on this experience and disability community feedback to present this submission to you, highlighting the strengths, weaknesses, opportunities and threats from moving Australia from the NDAP program to IDAP.

Our organisation aims to share what we believe our federal government can do to honour and respect people with disability in its reform efforts, and how to involve disability leadership throughout the transformation from NDAP to IDAP as the government, hopefully, fully co-designs the reform with our community.

PWdWA is proud to contribute to this important community consultation opportunity, reflecting our commitment to addressing discrimination, supporting people with disability, and advocating for systemic change through community and legal-based approaches.

We urge you to remember our long-running philosophy, [Nothing About Us Without Us](#) in everything you do.

—PWdWA Systemic Advocate Amanda Ellis and CEO Kat Johns

Acknowledgements

Acknowledgement of Country

We acknowledge Aboriginal and Torres Strait Islander peoples as the traditional custodians of Australia and acknowledge their continuing connection to land, sea and community. We acknowledge the traditional owners of the lands we live and work on, the Whadjuk and Noongar people, the Ngarluma, Yindjibarndi, Mardudhunera and Yaburara people, and the Wangkatha people, and pay our respects to elders past and present. Some of us come from afar, others from near and here, and acknowledge our deep gratitude at our shared access to these lands that were never ceded. Always was, always will be. We also pay our respects to all First Nations people reading this submission and acknowledge the contribution you make to advocacy across the globe.

Acknowledgement of lived experience

We are a disabled people's organisation that consists of people with disabilities who advocate for individual and systems change in our community. We pay respect to all people with disability and all people with lived experience of disability reading this submission. We and acknowledge the awareness, sensitivity and deeply valuable lessons you have learned that you can share with the Australian community in your individual and group submissions to this community consultation and in co-designing Australian laws and policy to help our community leaders improve the lives of people with disability in our country.

Acknowledgement of opportunity

PWdWA thanks DHDA and the Australian Government for the opportunity to provide our comments for the consultation into how our nation can better introduce its proposed transition to the IDAP program. We encourage all federal politicians and national governments officers to always co-design all policy and legislation about us with us. Thank you.

About People with Disabilities WA

Since 1981 People with Disabilities WA has been Western Australia's peak disabled people's community organisation representing the rights, needs and equity of all residents with physical, intellectual, neurological, psychosocial or sensory disability.

PWdWA is a member-based organisation that serves the disability community in WA with individual and systemic advocacy services. The organisation provides access to information, and independent individual and systemic advocacy support with a focus on the community's most vulnerable people.

Providing support for people accessing national, state and local services, PWdWA is run by and for people with disabilities. The organisation has many lived experience advocates in staff and management and on its board. The team aims to amplify the voices of all people with disabilities in Western Australia and empower them to live their best lives in the community.

Introduction

Individual Advocacy was established in WA by PWdWA and a small grouping of similar Disabled People's Organisations (DPO's). At the time, DPO's were seen as valuable by government, as there was an agenda of inclusion, and advocacy was peer based, and included systemic advocacy. Over time, individual advocacy programs have moved more towards service provision, and less about peers supporting peers. We value the fact that a profession does exist, and that people with disability can be confident that advocates are experienced, there is a level of expectation, but there is a tipping point at which the authenticity is lost, and we strongly recommend addressing this balance, via engagement with DPO's and the valuing of us, as orgs that can meet that balance. We are both 'generalist' and 'specialist' and it makes little sense to us to divide the two, since our organisation only has both of these strongly centred.

Systemic advocacy funding has been shelled out of federal and state funding schemes in the recent past, leaving state and federal disabled people's organisations like ours struggling to advocate nationally while still managing our individual advocacy caseloads. It was concerning to us when the Australian Government proposed a rebrand or replacement of the National Disability Advocacy Program with what's currently expected to be called the Individual Disability Advocacy Program. We wondered if we'd lose all systemic funding, and even though we currently only have 10% contribution to Systemic work, we value this, and we recommend strongly that this is increased to at least 25%, this is because the only way to make the pathways stronger for people with disability, and therefore advocates who support us individually, is to have systemic advocates working alongside.

Disabled people's organisations, and individual people with disability, have a long history of establishing, leading and delivering advocacy to their peers in the community. It was disappointing that the IDAP consultation and related

framework has very little meaningful reference to DPOs or disabled leadership in the delivery of advocacy. PWdWA prides itself on having disabled leaders and advocates to ensure a peer-based experience and lived experience expertise, in addition to expert advocacy skills.

We acknowledge the Disability Royal Commission our community vigorously participated in has proposed greater and more proper federal funding under NDAP. We know this must be implemented to help ensure people with disability have their international human rights upheld. However, the changes we expect to see with the introduction of IDAP from the currently proposed mid-2026 introduction date of 1 July 2026 may look significantly different from that imagined by the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability.

Nationally and internationally, the disability community has campaigned for Nothing About Us, Without Us philosophy. In Australia that core belief in disability community co-design translates to a deep commitment to the international human rights found in the Convention on the Rights of Persons with Disabilities, and choice and control embedded into everything that affects us.

Choice and control is not just an old value to be discarded at whim by the National Disability Insurance Agency and supporting agencies. It is a core value that must be retained and properly defined in legislation introduced and upheld by the Australian Parliament and the NDIS Act rules and guidelines implemented by the agency. Our NDAP or IDAP program must allow us to advocate for people with disability in this space, and tackle the rigid expectations and barriers that impede people with disability to live full lives in the community, supported by government and the organisations that provide us with vital services and community access, such as support providers and employers.

NDAP's successor IDAP must fund advocacy organisations to continue to operate in this space, including with the diabolically unfair and demoralising

international and external appeals and Administrative Appeals Tribunal regime we have federally.

We worry that the introduction of IDAP will coincide with the closing of any appeals to federal decision-making on NDIS plans and leave our community underfunded and bereft, with algorithmic computer-prepared plans or no coverage at all to meet their support needs.

We note the IDAP proposal has an increasingly strong focus on regional and regional area support. While we operate in these areas and strongly believe in supporting our disability community in the regions, we'll tell you the truth. The bulk of our disability community with severe and significant disability live in metropolitan areas to get better service support. Organisations such as ours that serve people disability in the regions *and* in metro areas cannot be left out of funded national reforms. Disability community numbers are largely metro-centred, just like the whole community where 70 per cent of Australia's residents live in metro areas. We can serve regional and metro communities from both our regional and metro bases, to deliver services with economies of scale.

Like many of our peers in the WA federal disability advocacy space, advocates at PWdWA have had to close our books to new AAT NDIS appeals. Our collaborator Sussex Street and its legal peers at [Legal Aid Western Australia](#) are also struggling to respond to AAT appeals advocacy requests.

We need more funding in the coming years to help people with disability push back against the deeply unfair and unsuitable plans we are expecting from its computer and algorithmic NDIS planning framework that's likely to result in more people being cut off from the NDIS, or having their plans cut or run with services that don't suit them or can't be accessed. To let this situation pass by without adequate support in IDAP or no mechanism for appeal would be deeply unsettling and problematic. People will die. It is important that we get IDAP right

and that it is also not paired with deeply disturbing NDIS changes that will distress and harm our community.

The disability-advocacy funding insecurity that nationally active DPOs and disability representative organisations such as ours face has a deep impact on our workforce. Our staff struggle to get mortgages and permanent affordable housing. They struggle to maintain full-time ongoing long-term employment at DROs because they have short contracts that coincide with DAP-funding periods. This results in heavy staff turnover and long periods of induction of staff in new organisations while older advocates with longer tenure struggle with ginormous caseloads and rapidly increasing requests from acrimonious legal counsel with unlimited grants of aid. It's a situation that cannot continue and must be countered by long-term funding commitments through IDAP that allow us to build a vibrant, well-trained psychologically safe workforce that can also advocate for systems change.

Our organisations value and include people with lived experience of disability, and respect and promote disability leadership among our ranks. We must be funded to continue our disability leadership on a long-term basis, so we can continue to support the many people with disability who come to us, and add in support for the many people in our community who have been unable to get support over the past decade of ongoing changes to the NDIS and the Services Australia space.

Our advocates are advocates with disability, bringing important lived experience to their knowledge how to advocate and what to seek. We are diverse and independent. We are in rural and regional areas and experience intersecting disability discriminate. And yet we are viewed as mainstream, and we are. We are worried we will miss out on funding dollars to small organisations with niche but still-very-important missions with less experience than us in serving the Western Australian community. If the government wants to massively

increase the DAP-funded advocacy organisations, then it needs consortium managers of organisations like ours that have strong relationship with DSS and DHDA and can deliver funding, support and mentoring to really reach the community. Massively increasing funded org numbers, where orgs are funded directly will result in less people served in our community, not more.

The government funding and grants that the federal government will introduce with IDAP must serve our community and we are best placed to continue to co-design disability advocacy reforms with you. Please involve us and our peer disability advocacy organisations in your continual efforts to design a fair and workable IDAP reform. We enjoyed working with the Disability Advocacy Network Australia on the first round on consultation on this reform but we were concerned that some of the changes you suggested that we did not want, were attributed to us in your consultation paper. This not consultation. Our insistence on valuing disability leadership was also missing. This is not okay. True community consultation and disability co-design is about us, with us. You must do better and hear our voices as we give you meaningful feedback in your proposed structure in the following pages and repeat what we have told you in person at DANA-facilitated workshops.

We want the reforms to meet our expectations and make the DAP program better funded and much better at supporting our community.

We encourage the Australian Government, DSS and DHDA to both hear people with disability's recommendations, and respect the professional advocacy experience we bring to the table, to make get IDAP right by trusting our community, building its capacity and making a collective impact with disability advocacy through making truly supportive IDAP reforms.

Nothing About Us Without Us.

Response to the questions in the consultation paper

1. After reading the ‘What we’ve heard so far’ section of the Consultation paper, do you think it sounds right? Please comment (optional).

After reading the ‘What we've heard so far’ section of the November 2025 consultation paper, [A new Commonwealth individual disability advocacy program](#) we back some of the views you’ve chosen to share with us. Others could benefit from more specificity. The omissions need to come right back in, and any misrepresented feedback re-clarified.

Like Sussex Street, we note there appears to have been limited opportunity to test the government and consultants’ pre-synthesised insights back with participants to ensure they were not misconstrued, oversimplified, or taken out of content.

PWdWA had expected to see explicit mention of disability-led advocacy and lived experience workforce development in the consultation paper, so this was a concerning omission in the paper’s ‘What we’ve heard so far’ section which had a profound lack of focus on disabled leadership and the critical prioritisation of a disabled advocacy workforce. This glaring absence contradicts the fundamental principle of “Nothing About Us Without Us” and fails to reflect the extensive feedback provided by the disability community, including our clear contributions during the [Disability Advocacy Network Australia consultations](#).

For the record to be accurate and legitimate, the consultation summary must explicitly centre the community’s non-negotiable call for advocacy that is *by and for* people with disability. This means actively recognising and planning to fund disabled people’s organisations as the primary delivery partners and investing in the development of a professional, sustainable advocacy workforce comprised of people with lived experience. Peer-led advocacy is not merely a preferred model; it is evidence-based, builds inherent trust, and ensures

advocacy is informed by the real-world expertise that comes from navigating systems as a disabled person. This approach is aligned with our rights under the Convention on the Rights of Persons with Disabilities, particularly our right to participate fully in decisions affecting our lives.

The current summary's vagueness on this point risks enabling a future program where disabled people are merely passive recipients of services designed and delivered by others. This would perpetuate the very power imbalances and paternalism that advocacy seeks to dismantle. We urge you to revise this section to honestly state that the community has demanded a program built on the authority and leadership of people with disability ourselves. True co-design begins with accurately hearing and representing our core demands.

The Disability Royal Commission

PWdWA fully support the development of a new advocacy program, with a priority on 'by and for' people with disability, that implements key recommendations of the Disability Royal Commission. We know advocacy is important for ensuring people with disability can have their rights upheld in all aspects of human rights.

Like Sussex Street, we also believe "effective advocacy requires both individual and systemic approaches. People with disability undoubtedly face significant legal, administrative, and emotional barriers, particularly in high-stakes processes such as NDIS decision-making and appeals."

We acknowledge Sussex Street's valuable point that "advocacy must support a continuum of need, from capacity-building and supported self-advocacy through to direct representation for people who are most vulnerable."

Advocacy (both individual and systemic) enables people with disability to be able to utilise rights already awarded, and fight for further protections. The pathways to justice are complex and many PWD cannot navigate these alone.

The process of doing so can be stressful and anxiety-provoking. Having advocacy from a disabled person's organisation available is essential, as many people with disability feel most comfortable when they can engage with an advocate from a DPO, an org that is by-and-for people with disability.

We agree with Sussex Street, "Choice and control remain foundational principles of disability reform and must be reflected in advocacy program design. However, current demand far exceeds available advocacy capacity. This is most acute in NDIS appeals, where funding constraints have at times forced advocacy services to close their books, leaving people without access to representation. Without adequate and flexible resourcing, pathways to justice remain effectively inaccessible for many people with disability.

"In a service ecosystem where we endeavour to collaborate and refer vulnerable people to ensure a 'no wrong door' approach – capacity and funding for NDIS nation-wide means that there is inevitably a brick wall behind that door. There is no capacity for further advocacy for NDIS appeals matters anywhere in the system, and the demand is overwhelming."

Choice and control is a principle that has been campaigned for by disabled people for decades. Reforms such as the NDIS was based on this and, in an ideal world, it would be easy for PWD to have this in all realms but that's not how things are right now. PWD face exclusion from economic, social and civic societies, as well as abuse and lack of adequate supports. That's why our Royal Commission recommended more advocacy funding for people with disability.

The NDAP program has historically provided a low level of flexibility with regards to the balance between individual and systemic advocacy, but the community don't have such rigid expectations, for example sometimes community members expect that a particularly problematic barrier to justice should be addressed by advocacy organisations so that the justice pathway can be

accessed. For this reason, PWdWA recommends that the DAP advocacy program is more flexible and enabling of both I and S advocacy.

The Commission also made it clear that advocacy needs proper funding, and unfortunately the trend is that demand far outweighs supply, leaving many people without the help they need. This is particularly notable for NDIS appeals, where in WA there have been times where all the appeals advocacy orgs have had to close their books due to lack of funding. It can't stay like this.

Independent Review of the National Disability Insurance Scheme (NDIS Review)

The so-called Independent Review of the National Disability Insurance Scheme was deeply problematic. While the review's contribution is acknowledged, the proposal is not supported. Like Sussex Street, we highlight "the review's findings and recommendations were not supported or endorsed by those embedded in the disability sector and community, who identified significant flaws in the review process and outcomes."

Foundational Supports consultations

Try suggesting a consultation about us with us. Foundational support proposals, like the latest iteration of independent assessments – the NDIS planning framework – are problematic and not centred on our community's needs and views. Back to the drawing board, please.

Individual advocacy feedback

“Individual disability advocacy services are valued. They provide trusted information and help people build skills.”

“Advocacy is an important safeguard. It helps people stay safe from harm.”

PWdWA supports a significant number of people who have guardianship orders, people who are subject to inappropriate restrictive practices and people who are facing abuse. Unsurprisingly, we agree advocacy is essential for safeguarding.

Like Sussex Street, we also know “Advocacy is obviously an important safeguard that helps people stay safe from harm (but) this insight ‘Advocacy is an important safeguard. It helps people stay safe from harm.’ doesn’t capture ... the depth and breadth of the advocacy required to keep people safe. The complexity and intersectionality of the issues people are facing requires significant time and resourcing to do well and for impactful outcomes to flow.”

“Advocacy services help people access support, uphold their rights and participate in their communities.”

Too right. Advocates and intake officers at PWdWA and Sussex Street regularly help people navigate systems to access supports. The funding rules for advocacy support are very rigid and navigation still isn’t funded, meaning referrals and help is often done by our organisations and others for free.

Upholding rights is the fundamental premise of advocacy and we agree that the DAP program needs to have a stronger focus on all aspects of human rights.

Like Sussex Street, we believe “successive governments and government bodies have developed systems that are now so complex to navigate, that they can often be completely out of reach for people already burdened by an extreme cognitive load of appointments, requirements and hurdles. Sussex Street are both advocates and system navigators. This part of the role we play is an

unfortunate side effect of large national services creating more barriers to entry rather than designing for soft landings.”

“People may need a professional advocate if they don’t have other support, need special knowledge or skills, or aren’t being listened to.”

Yup, we agree. We acknowledge Sussex Street’s passionate observation, “As a community legal service, we unfortunately see the levels of support required for people to navigate systems. On occasion our solicitors need to step in when even advocates can’t be heard, let alone carers and people with disabilities who have other natural supports. For those that have no-one in the corner, navigating the power imbalance can be insurmountable.”

“Advocacy services need to be stable and available long-term, so people can build connections.”

Too right. Federally there is a lack of stability in the way contracts have been implemented locally, leading to anxiety for our workforce, many of whom are disabled people. Unsurprisingly, this anxiety isn’t good for us being able to confidently assure PWD that we will be able to sustain long-term advocacy supports. Help us be here for the long term.

Sussex Street got it right when it said, “As a community legal service, we unfortunately see the levels of support required for people to navigate systems. On occasion our solicitors need to step in when even advocates can’t be heard, let alone carers and people with disabilities who have other natural supports. For those that have no-one in the corner, navigating the power imbalance can be insurmountable.”

The Australian Government needs to trust us to deliver disability advocacy well, help us and our sector build its capacity and make a strong collective impact with that advocacy.

“People should be able to talk to someone face-to-face if they want to.”

Yup, providing funding to enable more outreach (in person) would be ideal. Also, we already have advocates in regional WA but we want to be able to provide secure long-term and full-time positions in the regions. Help us out.

We note Sussex Street’s argument that “This is true as a principle, however especially in WA employing full-time advocates in the regions, particularly in areas like the Wheatbelt and Kimberley where mining and tourism has largely impacted on affordability and availability of housing, education and other services, requires genuine consideration of the pipeline and adequate resourcing and support structures required for this work.”

At PWDWA we remain committed to delivering well-funded regional advocacy in person and externally from across the state, but also know economies of scale matter, especially when our regional and metro intake team can consider people seeking advocacy for state services, as well as federal.

“Advocacy services need to be culturally safe.”

Advocacy by and for people with disability from a diversity of backgrounds, including First Nations people is important. Let’s get on the same page and build up federal disability advocacy so we can focus on cultural safety and collaboration. Nothing About Us Without Us.

We agree with Sussex Street that effective co-design can require “inclusive consortium models that bring together community legal centres, disability advocacy organisations, regional and metropolitan services, First Nations partners, and centres people with lived experience of disability to ensure reforms respond to the diversity of need in Western Australia.”

Cultural safety does need to be achieved with deliberate service design, workforce practices, and sustained relationships with communities, using a combined and flexible that is adaptive and localised in its approach.

2. To what extent do you agree or disagree with the aims in the ‘Our plan for a new program’ section of the consultation paper?

Hmm. There’s a section called “what we have heard from DRO’s” which doesn’t even once mention the importance of advocacy delivered by people with disability. This ignores the importance of disabled advocates stressed in the DANA consultations and paper. PWdWA recommends advocates with disability as being a central component in the reformed program.

Also uncool is that the plan-for-the-new-program section does not mention or emphasise systemic advocacy, and the rigid rules that make it hard for DPOs and other advocacy to undertake systemic work. This work is demanded by our community and advocacy orgs who are asking for flexibility and wanting SA to be funded properly to benefit us, with us.

The aims must of the new program must include disability leadership, systemic advocacy funding, and co-design with DPOs as measurable objectives”).

PWdWA fundamentally disagrees with the presentation and aims in this section, as they are based on a flawed and incomplete summary of community feedback.

The introductory subsection, “what we have heard from DROs,” egregiously omits any reference to the paramount importance of advocacy delivered by people with disabilities. This is not a minor oversight; it ignores the core testimony stressed in the Disability Advocacy Network Australia’s consultation report and the foundational “Nothing About Us Without Us” principle. An accurate and legitimate plan must explicitly name and prioritise *disability leadership* and the development of a *lived-experience advocacy workforce* as central, measurable objectives. The aims cannot be considered valid unless they commit to resourcing Disabled People’s Organisations as the primary deliverers of a peer-led model.

Furthermore, the entire “plan for a new program” fails to mention or emphasise *systemic advocacy*. This omission is glaring and unacceptable. Our community and advocacy organisations have consistently demanded flexibility and proper funding for systemic work, which is essential for tackling the root causes of injustice and preventing individual harm from recurring. The rigid rules of the current program actively hinder this vital work. Therefore, the stated aims must be expanded to include a dedicated, well-resourced commitment to systemic advocacy. This is not separate from individual advocacy but is its necessary complement, ensuring advocacy efforts create lasting change.

In summary, the current aims are inadequate. We can only agree with a revised set of aims that explicitly embeds: 1) disability leadership and a peer-based workforce, 2) robust, flexible funding for systemic advocacy, and 3) genuine co-design with DPOs as measurable, non-negotiable outcomes of the program.

3. To what extent do you agree or disagree with the list of activities we have identified to achieve these aims?

“Fund a diverse network of independent disability advocacy organisations nationwide, including access for rural and remote communities, people facing intersecting inequalities and people in segregated settings.”

Look, your aim doesn’t even mention people with disability. And diverse, what does that work even mean in this context? Your priority should be on funding disabled people’s organisations, or at least disability representative organisations employing very high numbers of people with disability in professional advocacy roles.

Rural and regional? PWdWA is across the state, we believe funding needs to ensure that each person has what they need the reality is most live in the city, but the regions are more disadvantaged, so how do we get this balance right? We

don't think moving funding from the city is appropriate, since waiting lists are high, but we would like to see additional funding in regional WA. PWdWA is based in Wheatbelt, Goldfields, Karratha and Peel, as well as having consortium partners in

Intersection inequalities. We're not all cis married white males with kids sitting in towers on St George's Terrace during working hours, going home to western suburbs mansions by the beach. In fact, none of us are us are that privileged. We have disability, we have families, we're gay, we're straight. We live in regional areas, we commute, we telecommute, we represent our community and we care. Don't leave us out because you perceive we're not diverse or intersectional enough because we represent all people with disability, all across the state. Intersectional lives matter. Metro and regional lives matter. This is who we are.

Segregation? Big topic. We need more choice and control. Nobody should be forced into a segregated setting, but some people may want to live with other PWD. There is a big difference between who choose segregate living and those who don't and there shouldn't ever be a model that supports a lack of choice. Our advocacy must support people's choice and also emphasise people should be able to choose how to spend the NDIS accommodation funding. We support choice, and we support PWD making those choices.

“Support outreach to people with disability facing intersecting inequalities, such as: Aboriginal and/or Torres Strait Islander people; people of different ages, sexes, gender identities, sexual orientations or intersex status; people from different ethnic, religious, cultural or linguistic backgrounds; people with different socioeconomic status; experiences of trauma and or abuse.”

The reality is almost all PWD face intersecting inequalities and trauma and abuse. We don't understand the notion that funding has been provided to a bunch of disabled people who haven't faced intersecting inequality, who are these disabled people? We will, however, ensure to improve in our cultural

security, and ensure to partner for stronger pathways and referrals systems from LGBTIQ+ organisations. Most people we speak to have trauma, so not sure how we can increase numbers of this cohort, but we have trained staff in trauma informed practice, and a range of other trauma informed learnings.

More training and professional development opportunities for advocates.

Agree

“Build strong relationships between the department and funded organisations.”

Agree

“Use information from the program to guide broader action.”

We need systemic advocacy

“Collect and evaluate data to track access, performance, outcomes and unmet service demand.”

What is the value in this? It’s time consuming, takes up valuable time of staff. Not necessarily opposed, but I think it needs to be simplified, not mandatory for an advocate to ask a person what their sexuality or background is when they’re in distress or if an advocate feels it’s really not appropriate for any reason. I think the way to get orgs to do this meaningfully is to engage with them to come to a shared understanding about how it can be used to benefit people with disability.

Inputs –“ To do these activities, we will need...

“... government funding and grants

Yes

“... workforce of advocates (paid and volunteer)

Not volunteer, this was not in any valid report of recommendation

“... partnerships with and between disability advocacy organisations

We do this well in WA. PWdWA has years of experience and can mentor newcomers, we're keen to undertake this.

“... training and professional development

Yes! Funding for this would be good, especially if you invest in disabled people who are advocates.

“... monitoring and evaluation systems”

What does this even mean?

4. After reading the ‘Our plan for a new program’ section of the consultation paper, do you think our overall plan would work? Please comment (optional).

It needs to emphasise the need for disabled leadership and advocates who are people with lived experience in our community.

The proposed plan provides a functional administrative framework, but in its current form, it will not succeed in its ultimate purpose: to deliver effective, transformative, and rights-upholding advocacy for people with disability. The critical flaw is the plan's failure to centre and mandate the very element that makes advocacy legitimate and effective within our community: *disabled leadership and a workforce grounded in lived experience*.

A plan that does not explicitly prioritise funding for Disabled People's Organisations (DPOs) and the cultivation of a professional peer-advocate workforce is building on unstable ground. It risks perpetuating a system where services are designed *for us* rather than *by us*, undermining the trust and cultural safety that are prerequisites for successful advocacy relationships. The expertise that comes from lived experience is not an optional add-on; it is the essential lens through which barriers are understood, strategies are formed, and genuine empowerment is achieved.

Furthermore, while the plan outlines activities, it lacks the necessary *compulsory principles* that would bind its implementation to disability justice. For the plan to work, it must be explicitly guided by the principles of "Nothing About Us Without Us," mandatory co-design with DPOs at all stages, and an unwavering commitment to resourcing both individual *and systemic* advocacy as interconnected pillars of change. Without these binding commitments, the plan is merely a bureaucratic reshuffle that will not address the power imbalances or meet the profound level of need within our community. We urge a fundamental revision to embed disabled leadership as the core engine of the program

5. To what extent do you agree or disagree with the principles of this program policy framework?

On Accountability & Enforcement: The principles are commendable, but they are meaningless without accountability mechanisms. PWdWA recommends that the framework include a requirement for an independent, disability-led monitoring committee to assess compliance with these principles annually.

On a Missing Principle – Independence: We note the absence of a principle guaranteeing the independence of advocacy organisations from government interference. Advocacy must be free to challenge policies and decisions without fear of funding retaliation. This must be explicitly stated and protected.

On Funding Structure: The separation of funding into streams risks fragmenting holistic advocacy. Many DPOs seamlessly integrate service delivery, systemic advocacy, and sector development. The funding model should reflect and enable this integrated approach, not force it into silos.

Principles

We like your principles but feel they need a little refinement and a few more principles in the mix.

As an example addition, we partially agree with the intent of the principles but find them insufficient. In their current form, they are too vague and lack the necessary commitment to disability leadership and systemic change.

Outcomes-focused

- **Outcomes-focused:** The program achieves real results for people with disability, for example it helps them achieve their human rights through clearly defined pathways or mechanisms to achieve just outcomes – it doesn't just count how many people are helped.

Transparent and trusted relationships

We're not so sure on what you mean by "clear and open ... working together" – does that mean you want all the data held by disability advocacy organisations? Do you want us to only use your systems? We're not comfortable with this. At PWdWA we've built our own systems with the disability community, for the disability community, that we want to continue using to benefit our community and enable us to handle the sheer number of cases we do each year. We'll continue to provide our government partners with necessary data, but not all the data we've collected over the years, actively hold now or will collect in the future.

You rightly challenge data sovereignty and system control. This could be expanded into a broader point about **autonomy and resourcing:**

The principle should ensure that DPOs are trusted to manage their own data and client relationships without undue government oversight that compromises confidentiality or independence.

Continuous improvement

We're on a similar page on continuous improvement, but we need a more holistic system and approach. We need to value the wisdom inherent in lived experience that disabled people's organisations, disabled leaders and

advocates and people with disability bring to disability advocacy and continuous improvement efforts. Our system needs to consist of supported DPOs that can work in with people with disability, drawing on their strong understanding to support continual improvements and systemic change. How about tying funding to *participatory evaluation led by DPOs*, not just government-led monitoring.

How about:

- **Continuous improvement:** The program will continually improve advocacy support and outcomes for people with disability by learning and listening to disabled people's organisations, disabled leaders and people with disability, and understanding our data analysis and research efforts.

Stability and sustainability

Disabled people's organisations like PWDWA and disability-led disability representative organisations like Sussex Street that provide disability advocacy and legal support for people with disability need long-term funding to reliably, consistently support the sheer number of people with disability who approach us each year. This principle shouldn't be used to redirect funding away from the disability community to other groups through a vague statement of support.

How about:

- **Stability and sustainability:** The program will help organisations such as disabled people's organisations of disability advocates stay strong and reliable by providing them with long-term funding, so people with disability can count on them.
- It shouldn't redirect funding away from DPOs, and stability also requires:
 - **Multi-year contracts** (5+ years)
 - **Indexation** to meet rising costs
 - **Full cost recovery** in funding agreements

Additional principles

- **Strengthened pathways:** The pathways to just outcomes and justice and are strengthened over time, as individual advocacy and systemic advocacy for much need change is actioned and learned from as disabled leadership supports people with disability in their advocacy efforts.

Inclusive support

- **Inclusive support:** Disability advocacy services is delivered by people with disability, under disabled leadership for people with disability. Nothing About Us Without Us and continuous disability co-design is a core value of the program.

Wholistic support

- **Wholistic support:** Disability advocacy and support is wholistic and joined up to seamlessly deliver services such as peer support, self-advocacy support, systems navigation support, individual advocacy and legal support in a coordinate way as people with disability navigation an inclusive life in the community, enjoying their human rights, safety, choice and control, and have their needs met.

Funding streams

You could question the **very structure of streams:**

- Does separating "service delivery" from "sector-strengthening" artificially divide work that should be integrated in DPOs?
- Does it risk creating a two-tier system where larger NGOs get sector-strengthening \$ while smaller DPOs are confined to direct service contracts?

Service delivery stream

We are concerned that the funds will be directed to non-disability organisations and non-disabled people's organisation to fund them or fund general advocacy, not disability advocacy. At PWdWA we have staff in Perth and Fremantle, the Peel region, the Wheatbelt, the Pilbara and the Goldfields. We are a rural and regional disabled people's advocacy organisation. Sussex Street is also dispersed. We help people in the regions and metro areas where many people with disability live. People in rural and regional areas and people with disability, will miss out if you direct funds from our services to additional small orgs without a disabled leadership and focused disability-advocacy vision.

So we propose the following refinement of your first funding stream.

- **Service delivery stream:** Funds organisations to provide direct advocacy support in specific areas, including access for metropolitan, rural and remote communities and in segregated settings.

National advocacy helpline stream

Hmm. No way! We oppose a national helpline stream. We need to continue to deliver Western Australian services from Western Australia. We need to do our intake ourselves, as we already do, considering people for support in a variety of realms, including state disability advocacy and support. East coast support doesn't serve us. We get so much of it already, unsuited to our community.

Sector-strengthening stream

Woah. Systemic advocacy is not just sector-strengthening. It strengthens society for people with disability. And when it's disability led and informed, it's disability co-design, about us, for us. Systemic advocacy needs to be its own stream and general. That aside, we support sector strengthening, particularly when you build up, mentor and train disabled leaders.

How about:

- **Sector-strengthening stream:** Funds sector development by supporting disability workforce development, including the use of lived experience feedback and advocacy, data and research to improve advocacy services, and targeted working with government and community organisations to identify and address systemic issues that affect people with disability and advocacy for people with disability.

Additional funded activities

Additional activities should also be funded in an additional activities stream and there should be flexibility for additional funding activities to be included over the years.

These activities must include:

- Systemic advocacy
- Navigation
- Peer support
- Supporting self-advocacy
- Disabled workforce development, including leadership, advocacy delivery to peers and supporting disabled people's organisations

How about:

- **Complementary advocacy services stream:** Funds additional advocacy services to support the disability community, including systemic advocacy, navigation, peer support, self-advocacy support, training and education, and disabled workforce and community advocate development, especially of emerging leaders.

Funding perspective

The first principle aims to fund a "diverse network." You challenge what "diverse" means, but you could argue more forcefully for a **"DPO-first" or "DPO-guaranteed" funding principle** to ensure disabled leadership is not diluted.

We support longer term funding, in particular to DPOs who have a disabled workforce, to ensure stability of their roles. We also encourage the government to invest in a disabled workforce, we know through research that peer based advocacy works best, and also many people with disability are interested in working as an advocate to support their peers to have better outcomes and resolve injustice matters. In addition, we strongly encourage the government to provide systemic advocacy funding through this program, since making the pathways to justice easier to navigate for individual outcomes means needing people (ideally disabled people) to be funded as systemic advocates to undertake this work.

Cultural safety is important, we encourage funding for 50D positions in organisations like ours, we have had a reduction in funding and no ability to recruit targeted positions such as this, but would welcome the opportunity.

We support outreach funding, and funding for regional advocacy, noting PWdWA were not allocated regional funding recently even though most of our advocates are regionally based in Wheatbelt, Goldfields, Pilbara and Peel. This has led to disparity and unfair processes, where DPO's such as ourselves who are statewide miss out.

We also support funding for more joined up pathways such as the discrimination cafe, where there is a soft entry point and joined up, partnership approach.

We fully oppose an open tender process, this is stressful, time consuming and unfair to those who employ people with disability to provide advocacy, where staff have no stability, we instead recommend that the current providers who are in a position to deliver advocacy, especially DPO's, get new contracts for 5 years,

and the only competitive tenders are for non-disabled organisations or without disability leadership (Sussex Street advocacy is led by people with disability for example, and we believe where this is the case, it's unnecessary for a competitive tender to occur). We also know how damaging open tender processes have been in recent times e.g. DES. We can avoid another disaster by not doing this and instead appreciating orgs who have been doing this for years.

Longer funding periods to support organisational stability

It's surprising that Aboriginal Community Controlled organisations have been identified in this section on the need for longer funding periods to support organisational stability but not disabled people's organisations.

Meeting the need for disabled person's orgs and services led by people with disability to have long-term funding, should be a primary priority.

Networks

In WA we do have strong connections and networks with other organisations e.g. the WANDA group, so we are not particularly concerned about any lack of collaboration, although we understand this may not be the case in eastern states.

Additional information

A joined up approach to national disability advocacy and advocacy programs is needed to benefit communities across the country.

Funding for peer support and other activities such as self-advocacy and partnership is needed in WA and other states and territories, as is individual and systemic advocacy delivered as a joined up system in community areas.

An example of a joined up I&S system in WA is the Discrimination Cafe initiative PWdWA and Sussex Street is delivering together to benefit people in both regional and metropolitan areas of the state.

Case study: Discrimination Café

Discrimination is a significant issue for PWdWA members across Western Australia and the wider disability community in Australia. To address this, PWdWA has partnered with Sussex Street to run Discrimination Cafes as drop-in sessions, run by people with disability with lived experience, including lawyers, advocates and other staff. The sessions which started in the second half of 2025 have been well attended. For example at sessions we have had between 12 and 50 attendees, and about 100 people attending over the pilot held in Perth's Belmont disability hub and online, and attended by people from metropolitan and regional areas. Our Disability Cafes are welcomed by our membership, with more sessions planned for 2026.

Demand for our Disability Cafes is clear, with requests also coming in to run this in regional and other metro areas. We're expecting employers could be provided with a 'your responsibilities' version, since currently we are focusing on 'your rights'. The pathway is joined up in all ways, people can drop in and learn self-advocacy, and it's run by and for people with disability as peer support. There are lawyers and advocates at the cafes, and where people need support, we can do intake on-the-spot or book in later. There is a strong partnership approach at the cafes between a legal advocates and community advocates. We are all on the same team, even though we're separate orgs.

The cafes are unfunded, with PWdWA doing this work as an organisation for free. Sussex Street help out too, on a small budget.

For many years now, PWdWA as the lead, peak, flagship disabled persons org in WA has been neglected in investment to undertake these sorts of initiatives, despite demonstrating the strong need for this to change through many initiatives and feedback to the department. This needs to change.

Discrimination Cafe uses the PATHWAY approach

Our Discrimination Cafes use the PATHWAY approach – peer support, advocacy, transfer, and a way forward.

1. Peer support, truth-telling and self-advocacy

People can drop in, socialise with peers in a safe environment, talk about what's going on. We have had a strong intersectional approach, we have had people from first nations, LGBTI, CALD and other diverse communities, and issues have been diverse, including employment, education and service provision.

2. Advocacy support via disability advocates or legal advocates

Where people don't feel they can self-advocate, we have an intake pathway into advocacy or legal support via PWdWA or Sussex Street.

3. Transfer to here and beyond

Discrimination Cafe support can be transferred to any region or other parts of metro areas – this flexible approach can be done anywhere.

4. A way forward

We take a partnership approach – while being lived experience-led our strong partnership between legal and advocacy sets a great path forward to delivering joined up advocacy in our communities.

