

Submission

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| To | Department of Health, Disability and Ageing |
| Topic | A new Commonwealth individual disability advocacy program |
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About

We are an inclusive not-for-profit organisation working alongside more than 80,000 South Australians each year and have been creating positive change for South Australian communities for more than 120 years. We advocate for systems change across diverse social justice issues to shape public and social policy that delivers better outcomes for marginalised communities.

We support those in need to find the courage to move forward through enriching their lives and uniting the communities in which they live. By tackling the deep-seated challenges that affect people's lives, we are working to create systemic change and brighter futures for all South Australians. Uniting Communities has extensive experience supporting people with a disability across a wide range of needs. Through programs such as:

[NDIS Support Services](#)

Uniting Communities offers personalised NDIS support through one-to-one services that help individuals build independence, engage with their community, and achieve personal goals. Support workers assist with daily living, social participation, and skill development, tailoring services to each person's unique needs and preferences.

[Individualised Living Options Service](#)

Uniting Communities' Individualised Living Service provides tailored support for people with disability to live independently in their own homes. The service is designed around each person's goals, preferences, and lifestyle, offering flexible assistance with daily routines, decision-making, and community engagement. It promotes autonomy and wellbeing through respectful, person-centred care.

[Law Centre](#)

Uniting Communities Law Centre provides free legal help to people experiencing disadvantage across South Australia. We understand that dealing with the legal system can be confusing and daunting and staff in the [Uniting Communities Law Centre](#) assist people to work through these challenges. The qualified team provides support with information, advice, representation, referrals, or community legal education.

[Disability Advocacy Service](#)

Uniting Communities' Disability Advocacy Service (DAS) provides free, independent support to help people with disability understand and assert their rights. The service assists with NDIS-related issues, including appeals, by offering legal advice, advocacy, and referrals. Delivered through the Uniting Communities Law Centre, DAS is a multidisciplinary team of lawyers and advocates. Beyond appeals, DAS also supports people outside the formal NDIS process—for example, assisting those denied access to reapply, providing information and advice on navigating the NDIS system, and linking individuals to broader community supports.

Submission to a new Commonwealth Individual Disability Advocacy Program Consultation

Uniting Communities thanks the Department of Health, Disability and Ageing for consulting on the development of a new Commonwealth Individual Disability Advocacy Program. Advocacy is a vital form of support, and the Royal Commission has clearly demonstrated the need to strengthen these services. Advocates provide a crucial point of contact when people have concerns, and public awareness will be essential to ensure people know they can turn to this program for help. We have provided several recommendations to ensure the new service is fit for purpose. It will be important that the program is accessible to all people with disability, including those who may otherwise face barriers to receiving referrals, information, advice, and support such as those in regional and remote areas.

Our key recommendations:

- **Ensure the new advocacy service is properly resourced to meet demand, informed by data on referrals and unmet need across states.**
- **Ensure the new program addresses critical service gaps by providing access to advocacy support and legal representation in disability discrimination matters.**
- **Prioritise a multidisciplinary model that integrates advocacy support and legal advocacy, ensuring clients receive timely, comprehensive support to make informed decisions.**
- **Design the new program with flexibility to meet diverse client needs, supported by consistent national guidelines and clear standards for advocate qualifications and training.**
- **Include community education in the new advocacy service so people with disability and frontline providers can understand their rights and navigate the system with confidence.**
- **Ensure the new advocacy service is resourced to deliver specialist training, employ dedicated staff, and embed accessible design so people with complex communication needs are supported to make informed decisions.**
- **Ensure the new disability advocacy program is adequately resourced to reach and support people in rural and remote areas, recognising that geographic isolation compounds disadvantage and heightens the need for advocacy.**

Additional Comments

Sufficient capacity

Across the board, disability advocacy services are operating at full capacity. Like many services, our Disability Advocacy Service (DAS) is already unable to meet demand, and staff must also navigate formal processes and timelines within the Administrative Review Tribunal, adding further strain on resources.

Any new federal service must be adequately resourced to meet the growing needs of communities. We recommend that data analysis be undertaken using existing service information, including referral numbers and unmet need (clients turned away), to determine the requirements in each state.

Service gaps will vary across jurisdictions. In South Australia, there is a particular need for legal representation in matters such as disability discrimination. Current legal support is largely limited to dispute resolution, rather than representation at hearings. DAS receives many enquiries for assistance

with issues such as disability discrimination in schools, but as our service is restricted to NDIS appeals (and already at capacity), we are unable to assist. Addressing this gap will be critical to ensuring advocacy that effectively tackles discrimination.

Multidisciplinary approach

A multidisciplinary approach should be prioritised to ensure the service can respond effectively to the complex and intersecting needs of clients. At DAS, this model combines experienced advocates with legal advocates and lawyers for Administrative Review Tribunal hearings, enabling comprehensive support. As part of a legal centre, clients also benefit from access to broader legal assistance and related services, including matters before the Equal Opportunity Commission and the South Australian Civil and Administrative Tribunal. This integrated approach delivers efficient responses, ensuring clients receive the right information and support at the right time to make informed decisions.

Service flexibility

The scope of an individual disability advocate's role varies across services, particularly depending on whether they are state- or federally funded. Rather than adopting a single framework, the new program should be designed to allow greater flexibility so advocates can respond to the diverse needs of clients. This approach would enable more efficient use of resources, instead of applying a uniform model to all circumstances.

While a federal disability advocacy guide exists, consideration should be given to introducing standard guidelines across both state and federal services. These guidelines should draw on the expertise and experience of existing services and include consistent definitions and clear direction on advocacy practice. In addition, greater clarity is needed regarding the qualifications and training required for advocates.

Community education

A new individual advocacy service would be well placed to develop and deliver community education initiatives, and any tender proposal should include this within its scope. Given the complexities of the system, it is often challenging for people with disability, service providers, and frontline professionals (e.g. support coordinators, GPs) to fully understand their rights and the system more broadly. Proactive engagement helps reduce unnecessary referrals and ensures people access the right support at the right time. Education is therefore vital to the efficient functioning of the system and to building community awareness of available supports. At Uniting Communities, our law centre has demonstrated this in practice by delivering training that translates complex legislation and information into accessible formats, enabling people to understand their rights and navigate the system with confidence.

Independent

For advocates within the new service to be truly independent, structural safeguards must be in place. For our Disability Advocacy Service (DAS), although the program is situated within the wider structure of Uniting Communities, the law centre is distinct from our disability support services (legally separate). Client information is kept strictly separate, and conflict of interest checks are embedded in our processes. These measures ensure independence while still enabling appropriate referrals to other services, supporting a holistic response to client needs.

Complex communication needs

We agree that 'it's important that advocacy services can help people make their own decisions and support people with complex communication needs.' To achieve this, the new service must be sufficiently resourced to provide enhanced staff training and to employ specialist staff who can deliver tailored support. The service design, including its accessibility features, should explicitly accommodate people with complex communication needs to ensure it is genuinely accessible to those most vulnerable.

Conclusion

We appreciate the opportunity to contribute to the Department of Health, Disability and Ageing's consultation on a new Commonwealth Individual Disability Advocacy Program. Our submission outlines measures to strengthen the program's design and implementation, ensuring it is responsive, well-resourced, and capable of meeting the current and emerging needs of people with disability.