

Department of Social Services
Australian Government

7 February 2025

Dear Chair

Family Advocacy welcomes the opportunity to provide a submission to the Department of Social Services regarding its consultation on Self-Directed Supports Registration. We are a not for profit disability advocacy organisation that works across New South Wales (NSW) to advance and protect the rights and interests of people with developmental disability. We have been providing individual and systemic advocacy for over 30 years.

Family Advocacy endorses the submission made by the Self Manager Hub, Registration of NDIS Participants who Self-Direct our Supports, in its entirety. For decades, we have promoted self-directed arrangements. Since the commencement of the NDIS, we have strongly promoted self-management and supported people with disability and their families to be equipped around the mechanics and possibilities of self-management.

Recommendations

We support all of the 10 recommendations put forth in the Self Managers Hub submission. The top line being:

- Broaden the definition of self-directed supports.
- Those with self-directed arrangements should automatically qualify for provisional registration.
- To transition to full registration, participants or their nominees should, within 12 months, show basic capacity to manage self-directed supports through successful completion of a brief online training module on self-direction principles and practices and guidelines on rights and responsibilities of participants who self-direct their supports.
- Establish a co-design working group.
- Address risk by investing in capacity building for self-advocacy skills to assert right, navigate systems and make decisions.
- Establish peer-led support structures.
- Ensure all systems and processes prioritise choice, control and autonomy.
- Ground the framework in human rights principles in line with the UNCRPD.
- Recognise that self-directed supports are a pathway to independence and inclusion.
- Recognise that risk is a dynamic and complicates process and should not be applied to a person or a type of support but rather lack of community, self-advocacy, or supportive relationships.
- Recognise that relationships and community inclusion are vital safeguards that compliance-based models cannot replicate.

Further to these recommendations, Family Advocacy wants to ensure that the impact of the registration process on the family is considered. In the case of developmental disability, it is not uncommon, in certain circumstances, for the family to support their family member with disability for the entirety of their life. In the case of children and young

people, the parent is often the main advocate for the child, acting with the best interests of the child in mind, and having to understand their rights and to navigate systems.

We wish to highlight that families who support a family member with developmental disability may already have a heavy administrative onus placed upon them to navigate the NDIS, including the with recent reforms. Some parents have told us the hours spent on managing the NDIS is the equivalent of a having a part-time job. We appreciate that some safeguards need to be in place but strongly request the administrative burden for registration be minimal.

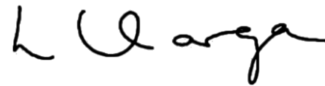
With this in mind, we would like to extend the recommendations to include the family in:

- capacity building for self-advocacy to assert rights, navigate systems and make decisions to include capacity building for the supporting the family member in their role as nominee. This will act as a safeguard, both for strengthening the role and ensuring the most optimum outcomes alongside the person with disability.
- establishing a co-design working group to include family members who have lived experience of disability in that they walk alongside and support people with developmental disability and have valuable insights to offer.
- establishing peer-led support structures to include the nominee.
- keep the administrative burden minimal.

Yours Sincerely



Cecile Sullivan Elder
Executive Officer



Leanne Varga
Systemic Advocate and Campaigns Manager

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ABN 82 855 711 421