



**Australian Federation of
Disability Organisations**

PRIORITIES FOR THE 2025–26 BUDGET

Submission to Treasury

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AFDO author & contact:

Matthew Hall
National Manager - Systemic Advocacy & Policy
matthew.hall@afdo.org.au

Reviewed & approved:

Ross Joyce
Chief Executive Officer

ABN : 25 105 510 898
Email: office@afdo.org.au
Website: www.afdo.org.au
Phone: 1800 219 969

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Acknowledgements

Australian Federation of Disability Organisations (AFDO) acknowledges Aboriginal and Torres Strait Islander people as the traditional custodians of the land on which we stand. We recognise their continuing connection to land, waters, and community. From our offices in Melbourne, Canberra, Sydney, and Newcastle, we pay our respects to the peoples of the lands on which we operate and to their Elders past, present, and emerging. We also pay our respects to the traditional owners of all lands on which we operate or meet around the country.

AFDO acknowledges people with disability, particularly those individuals that have experienced or are continuing to experience violence, abuse, neglect, or exploitation. We also acknowledge their families, supporters, and representative organisations and express our thanks for the continuing work we all do in their support.

Language used in this document

AFDO uses person-first language, like "people with disability," not identity-first language. This is a deliberate choice made by AFDO. This aligns with the UN Convention on the Rights of Persons with Disabilities. It also matches the language used by all levels of government in Australia. Most other peak bodies in the Australian disability sector also use person-first language.

AFDO chooses to use this language because it puts the person before the disability. It values the individual by seeing them as a person, not a condition.

Consistent with this position, AFDO uses person-first language in this document.

We know many people with disability prefer identity-first language. Disability is a part of their identity. This language shows a connection to the disability community and pride in their disability. It also says society is what disables them.

Views on language use reflect people's identities, experiences of disability, and community attitudes. It is a matter of individual choice and agency. AFDO respects everyone's right to choose how to describe their identity and experiences.

"People with disability," means anyone who is d/Deaf (including people who identify as culturally Deaf), or who has a learning disability, or a sensory, physical, hidden, or mental health condition.

About AFDO

Since 2003, the Australian Federation of Disability Organisations (AFDO) is a specific & cross-disability national peak body and a Disability Representative Organisation (DRO), funded by the Commonwealth government (through the Department of Social Services) to represent and advocate for people with disability and support them to fully take part in Australian life - socially, culturally, politically, and economically. Through our membership (many of whom are national, disability-specific, cross-disability or family led peak bodies)

AFDO is in a position of a national peak of peaks in the disability sector, having a total reach of over four and a half million Australians.

AFDO is also a Disabled Peoples Organisation (DPO), governed, led and constituted by people with disability. We are within a disability rights movement that places people with disability at the centre of decision-making in all aspects of our lives.

AFDO is a strong, trusted voice for the disability sector. We advocate on national policy, inquiries, and initiatives with governments at all levels in Australia. We work to build a community where people with disability can take part in all aspects of social, economic, political, and cultural life. This means:

- real participation in community life
- building respectful, valued relationships
- social and economic participation, and
- contributing as valued citizens.

Our vision

All people with disability can take part equally in all aspects of social, economic, political, and cultural life.

Our mission

Using the strength of our member organisations to harness the collective power of uniting people with disability to change society into a community where everyone is equal.

Our strategic objectives

- To represent the interests and united voice of our members and people with disability at a national and international level in all relevant forums.
- To build the capacity, profile, reputation, and sustainability of AFDO through the strength of our member organisations.
- To enhance the connection and influence in international disability initiatives by policy, advocacy, and engagement, focused on the Asia Pacific region.

Our members

AFDO's member organisations contribute to the national policy agenda and address issues that impact the lives of people with disability in Australia. We understand that disability specific organisations play a key role in the provision of information and peer support to people with disability and their families. This role keeps them closely connected to their grass roots communities. Each community has its peak organisation that uses its voice to advocate on issues.

Information about AFDO's members can be found on [AFDO's website](#).

1. Acronyms and abbreviations

The following list of terms may assist readers in understanding the terms used in this document.

ABS	Australian Bureau of Statistics
AFDO	Australian Federation of Disability Organisations
CRPD	United Nations Convention on the Rights of Persons with Disabilities
DDA	Disability Discrimination Act 1992 (Cth)
Department or DSS	Department of Social Services
Disability Royal Commission or DRC	Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability
ILC	Information Linkages and Capacity Building grant program administered by DSS
NDIA	National Disability Insurance Agency
NDIS	National Disability Insurance Scheme
NDIS Act	National Disability Insurance Scheme Act 2013 (Cth)
UN	United Nations

2. Executive summary

In summary, AFDO urges Treasury, and the government to include each of the following as priorities for the 2025-2026 Federal Budget:

1. Increased and more equitable funding for DROs, including:

- (a) Doubling current DRO funding levels
- (b) Extended funding commitment for DROs
- (c) Transparent and equitable distribution of DRO funding
- (d) Adjustment for individual advocacy agencies
- (e) Greater resources for disability legal advocacy, and

- (f) Alignment with international obligations.
- 2. **Fund a DRO to represent the interests of older Australians with disability.**
- 3. **Funding of implementation of all recommendations of the Disability Royal Commission.**
- 4. **Funding to fully implement recommendations 5.6 and 6.2 of the DRC.**
- 5. **Pause eligibility reassessments under the NDIS.**
- 6. **Emergency bridging funding for supports until Foundational Supports are available to all.**

3. Increased funding for disability advocacy and representation

3.1 Acknowledgement of progress and current context

AFDO acknowledges and extends its gratitude to the Albanese government for doubling the funding allocated to the Disability Representative Organisations (DROs) funding program on taking office. This demonstrated a strong commitment to the disability sector, and to the important role of DROs in representing, and advocating for, the rights and interest of people with disability to government.

However, 2022 data from the Australian Bureau of Statistics¹ shows a 3.7% increase in the number of Australians with disability, from 2018 (increasing from 17.7% to 21.4%, which is 5.5 million Australians). It is also important to consider the ages of our community. 15.0% of people aged 0-64 years are people with disability. This is to be compared with 52.3% of people aged 65 years and over. Further, the number of Australians aged 65 years and over also increased, to 17.1% (up from 15.9% in 2018). As at 2022, 39.8% of older Australians living at home needed some assistance with everyday activities.

With the Australian population ageing, we anticipate a similar (or higher) level of increase in the number of Australians (and older Australians) with disability the next time the ABS releases its “Disability, Ageing and Carers, Australia: Summary of Findings”.

These numbers highlight the growing demands on advocacy and support systems for people with disability (and older Australians with disability) across the country.

In addition to the growing population of people with disability, Australian governments are undertaking a program of significant reform across the disability sector, by all jurisdictions.

For example, in addition to the significant reform being undertaken by the Commonwealth and the states and territories on Foundational Supports (including the public inquiry by a select committee of the NSW Legislative Council on “Foundational and disability supports available for children and young people in NSW”²), the NSW Department of Communities and Families is undertaking public consultation on the legislative framework for regulating the use of restricted practices on people with disability³, and a committee of the Legislative Council of Victoria is inquiring into community consultation practices.⁴

At the Commonwealth level, the need for representation and advocacy for people with disability is also not limited to the activities of the DSS or the NDIA. For example, current or recent inquiries by government that have the potential to significantly affect the rights and lives of people with disability include the Attorney-General's Department's public consultation on the use of automated decision-making by government⁵, Treasury's current public consultation on mandating businesses to accept cash⁶, and the Interim Aviation Industry Ombudsperson's release for public comment of the draft "Aviation Customer Rights Charter"⁷.

In addition, the Department of Infrastructure, Transport, Regional Development, Communications and the Arts is undertaking a detailed (and welcome) co-design of the aviation-specific Disability Standards under the DDA, announced in the government's White Paper⁸.

This level of activity requires further increased, significant work by DROs, and other disability advocates, to ensure people with disability remain at the centre of government programs, and that reform occurs only through effective consultation with, and codesign by, people with disability.

Despite existing efforts, the sector faces significant unmet needs. Funding for systemic and independent advocacy is crucial to prevent service gaps and enable continued support for people with disability navigating complex systems.

3.2 Increased and more equitable funding

In the face of this increasing (and continuing) demand, and to sustain and strengthen the necessary effort, it is essential to secure the future of advocacy organisations and ensure people with disability continue to have robust representation and support in achieving their rights and full participation in society.

AFDO's priorities for the 2025-2026 Federal Budget continue to be the following:

1. **Doubling Current DRO Funding Levels:**

An immediate doubling of the current funding allocation for DROs to a minimum of \$12 million for 2025-2026, and across the forward estimates.

2. **Extended Funding Commitment for DROs:**

From 2026, replace the current two-year funding cycles for DROs to a minimum term of four-year funding. This will allow all DROs to develop, and implement, effective long-term planning and programs and will ensure stability and continuity for staff.

3. **Transparent and Equitable Distribution:**

Change the DRO funding model to ensure funding is distributed equitably among all DROs in accordance with a transparent framework agreed and codeveloped with the sector. Under this changed funding model, DRO funding must only support Disabled People's Organisations which includes Family led Organisations, who advocate on behalf of people with disability, in line with the UN CRPD.

4. Adjustment for Individual Advocacy Agencies:

Individual disability advocacy must be recognised as an essential element of a functional disability sector. The government should commit to secure long-term funding for disability representative organisations to enable them to effectively represent their community. Funding for individual advocacy agencies under the National Disability Advocacy Program must align with inflation and annual adjustments in Fair Work salary benchmarks to maintain service delivery standards.

5. Greater Resources for Disability Legal Advocacy:

The complexity of legal issues faced by people with disability is increasing. It is imperative that additional funding is directed to support these services, which are essential for addressing discrimination, accessing justice, and navigating legislative and administrative barriers. Targeted investment in this area will enhance legal advocacy capacity and ensure timely, equitable outcomes for people with disability and reduce other costs for government.

6. Alignment with International Obligations:

Australia has international obligations under the United Nations Convention on the Rights of Persons with Disabilities (CRPD) to ensure continuous, sustainable, and adequately resourced advocacy programs. These resources are vital for both individual advocacy and systemic representation, contributing to inclusion and combating discrimination against people with disability.

3.3 Fund a DRO to represent the interests of older Australians with disability

DSS, through the DRO funding program, funds organisations to represent all people with disability⁹, people with disability within disability-specific cohorts¹⁰, women (and women-identifying people) with disability¹¹, First Nations people with disability¹², people with disability who are culturally and linguistically diverse¹³, people with disability who are LGBTIQ+¹⁴, and children and young people with disability¹⁵.

What is missing from this list is an organisation that is funded to represent and advocate for older Australians with disability. This is even though 52.3% of people aged 65 years and over have a disability¹⁶, and the number of Australians aged 65 years and over is also increasing. Older Australians who acquire a disability after they turn 65, or otherwise were not a NDIS participant before their 65th birthday cannot access the NDIS¹⁷.

A participant will also cease to be eligible to remain a participant if, after turning 65, the person first goes into an aged care home or starts receiving home care under the aged care system, and this care arrangement is to be permanent.¹⁸ Foundational Supports will also not be available to older Australians with disability. This requires older Australians with disability to have a voice in advocating to the Department of Health and Aged Care.

The environment which older Australians with disability must seek to navigate is complex. Their interests do not necessarily align with other cohorts of people with disability (many of whom already have a funded DRO to represent them to government, including the NDIA). Many older Australians are without crucial support or guidance. Older Australians need their own DRO to represent them to government, including the Department of Health and Aged

Care.

4. Implementation of the recommendations of the Disability Royal Commission

4.1 Funding of implementation of all recommendations

After four-and-a-half years of harrowing evidence regarding the abuse and violence experienced by people with disability, we are concerned that as few as 13 of the 222 recommendations have been fully accepted by the Commonwealth Government. State and Territory Government responses have been similarly disappointing.

As a matter of priority and urgency, the Commonwealth Government must accept and progress (including funding to implement) key recommendations — especially within Volume 7 of the Final Report (regarding education, employment, and housing) and within Volume 4 (regarding the human rights of people with disability) — to enable an integrated ecosystem and an inclusive society throughout all of Australia, across all levels of government.

This will not only improve laws, policies, structures, and practices to ensure a more inclusive, just society, and a more productive economy, but also ensure our compliance with the CRPD and other international laws by implementing the recommendations of the 2019 Concluding Observations¹⁹ of the United Nations CRPD Committee.

4.2 Funding to fully implement recommendation 5.6

Recommendation 5.6 is one of the recommendations that the Australian Government has not yet accepted. The recommendation calls for the establishment of a dedicated Minister for Disability and a dedicated Department of Disability Equality & Inclusion that is staffed by and for people with disability²⁰. Implementing this change will ensure a dedicated Minister for Disability for the interests of all disabled people, dedicated to working for us, regardless of whether NDIS participants. This dedicated Minister for Disability will also be focused on fostering an inclusive Australia where opportunity and entitlement to equality exists for all people with disability to live alongside people without disability.

The evidence is overwhelming: centring people with disability in all relevant decision-making processes and progressing their inclusion across all areas of life leads to better outcomes for all. The exclusion of people with disability from governance and decision-making places them at much higher risk of violence, abuse, neglect and exploitation.

This societal segregation of disabled people curtails their socio-economic participation, their contributions to the Australian economy and undermines the efficacy of any policies and services meant to support them as equal members of the Australian community.²¹

4.3 Auslan interpreting

The need to increase the number and quality of Auslan interpreters was a key recommendation of the Disability Royal Commission²². In the joint government response to the Commission's recommendations released in 2024, the Australian Government, together with state and territory governments, acknowledged the importance of Auslan interpreters

and Deaf interpreters and translators for people who are D/deaf or hard of hearing²³.

AFDO, together with its DRO consortium member, Deaf Australia, call for funding to be allocated in the 2025-2026 Budget to implement the Disability Royal Commission's Auslan workforce recommendations. A workforce strategy needs to be developed to boost the Auslan and Deaf interpreter workforce, based on "a robust demand-supply analysis to quantify the current gaps and shortages in interpreting service"²⁴. The strategy must include costed initiatives to:

- "increase the number of Auslan interpreters, including the provision of scholarships and stable ongoing employment opportunities, particularly in under-served areas
- support specialisations in health, legal and other critical sectors (including minimum qualifications)
- provide ongoing professional development and industry standards to support a high-quality interpreter workforce
- increase and retain Auslan interpreters who are First Nations or from culturally and linguistically diverse backgrounds, and
- raise awareness and promote pathways to becoming an Auslan interpreter"²⁵.

Such funding will help to address critical gaps in the current Auslan workforce and help improve the accessibility of information and communications consistent with Australia's Disability Strategy 2021-31.

5. Pause eligibility reassessments under the NDIS

5.1 Current context

Foundational Supports for people with disability who are not participants in the NDIS are to be provided by the states and territories and were agreed upon by national cabinet more than a year ago. These Foundational Supports are supposed to be in place by 1 July 2025. However, at this time, there is very little agreement on what Foundational Supports actually are, let alone the architecture in place to provide them²⁶.

Notwithstanding this lack of clarity, and no existing Foundational Supports available to people with disability who are not participants in the NDIS, the NDIA is undertaking significant activities to reassess the eligibility of participants. At a Senate estimates hearing in November 2024, NDIA acting chief executive Mr Scott McNaughton confirmed the Agency is prioritising "unscheduled reassessments" of eligibility²⁷. Mr McNaughton also disclosed that 1,200 NDIS participants, mostly children, were being reassessed every week, with nearly half of them removed from the scheme.²⁸

This is completely inconsistent with the idea that the changes made to the NDIS will occur only in lockstep with the implementation of Foundational Supports, and inconsistent with the underlying principle of Foundational Supports that Foundational Supports are:

specific supports ... available to people (who) are not accessing or not eligible for supports that are delivered through the NDIS, to

help people with disability and their families and carers. These are supports that offer more help than what is offered through mainstream (sic) or community (sic) services.²⁹

5.2 Pause eligibility reassessments under the NDIS

The 2025-2026 Budget must provide funding to the NDIA to continue to support all current participants until the agreed system of Foundational Supports is funded and available to all Australians with disability who are not participants in the NDIS (and who are not over the age of 65). This will allow the NDIA to cease its current practice of unscheduled eligibility reassessments until the supports are available for those who are removed from the system.

6. Emergency bridging funding for supports until Foundational Supports are available to all

6.1 Current context

The planned (but as yet unimplemented) system of Foundational Supports for people with disability who are not participants in the NDIS is also having unintended and significant consequences for the supports that have been in place for many people with disability. This is especially so for supports for disability-specific cohorts that previously have been funded by DSS through the “Information Linkages and Capacity Building”, or ILC, grant funding program.

AFDO is aware of several support services that were not funded in the last ILC round.

The DSS on Foundational Supports expressly did not cover ‘targeted’ supports for particular groups of people with disability.³⁰

If those supports are to be replaced by Foundational Supports, those new supports are not yet in place. There are no current replacement support services for the people with disability and their families who rely on these critical supports.

For example:

- Deaf ACT is a member of Deafness Forum Australia (a member of AFDO’s DRO consortium). Deaf ACT has been operating since 2010, directly supporting over 400 families in the ACT (and many more families indirectly), including peer support. Deaf ACT was unsuccessful in its bid for ILC funding. It now is faced with either stopping services provided under the scheme or coordinating these services on a voluntary basis. There are no other services providers to whom Deaf ACT can transition or introduce its clients. Deaf ACT has contacted the ACT Minister for Disability to resolve the situation. The territory Minister advised Deaf ACT that it needed to approach the Federal Minister for continued funding.
- Parents of Deaf Children is also a member of Deafness Forum which supports over 400 families directly in NSW. Parents of Deaf Children is at imminent risk of closure due to the loss of ILC funding. Parents of Deaf Children has been trying to find other organisations or services that can support their 400 families. Like Deaf ACT, they

have been unable to do so. There is simply no replacement services available.

6.2 Emergency bridging funding for supports for disability specific cohorts

In these dire circumstances, AFDO urges Treasury to ensure that emergency bridging funding is made available to all support services for disability-specific cohorts, including Deaf ACT and Parents of Deaf Children is made available, so that these vital support services can continue until the planned foundational Supports are in place.

Endnotes

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- 1 Australian Bureau of Statistics, Disability, Ageing and Carers, Australia: Summary of Findings, 2022, released 4 July 2024, retrieved from <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/2022> accessed on 24 January 2025
 - 2 <https://www.parliament.nsw.gov.au/committees/listofcommittees/Pages/committee-details.aspx?pk=331> accessed 8 January 2025
 - 3 <https://www.haveyoursay.nsw.gov.au/rpl-framework> accessed 8 January 2025
 - 4 <https://www.parliament.vic.gov.au/consultationinquiry> accessed 8 January 2025
 - 5 <https://consultations.ag.gov.au/integrity/adm/> accessed 15 January 2025
 - 6 <https://treasury.gov.au/consultation/c2024-604832> accessed 8 January 2025
 - 7 www.infrastructure.gov.au/Aviation-Rights-Charter accessed 8 January 2025
 - 8 Commonwealth of Australia, Aviation White Paper – Towards025, 2024, retrieved from <https://www.infrastructure.gov.au/sites/default/files/documents/awp-aviation-white-paper.pdf> accessed 11 October 2024
 - 9 Including AFDO and People with Disability Australia (PWDA)
 - 10 For example, Blind Citizens Australia and Deaf Australia, through the AFDO DRO consortium
 - 11 Women with Disability Australia
 - 12 First People's Disability Network
 - 13 National Ethnic Disability Alliance
 - 14 PWDA
 - 15 Children and Young People with Disability Australia
 - 16 See note 1
 - 17 s22(1)(a), NDIS Act
 - 18 s29(1), NDIS Act

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- ¹⁹ United Nations Committee on the Rights of Persons With Disabilities [Concluding observations on the combined second and third reports of Australia](#) (Advance Unedited Version) (CRPD/C/AUS/CO/2-3) upon its review of the combined second and third periodic report of Australia on the implementation of its international human rights obligations under the Convention on the Rights of Persons with Disabilities
- ²⁰ Commonwealth, Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, *Final Report* (2023) Vol 5, recommendation 5.6.
- ²¹ James Vincent, Dennis McCarthy, Hugh Miller, Kirsten Armstrong, Sarina Lacey, Grant Lian, David Qi, Nansi Richards & Tomas Berry, Taylor Fry and the Centre for International Economics, Economic cost of violence, abuse, neglect and exploitation of people with disability, Report prepared for the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, February 2023
- ²² Note 20, Vol 6, recommendation 6.2.
- ²³ Commonwealth, *Joint Australian, State and Territory Response to Disability Royal Commission Recommendations* (2024) pp.10-12
- ²⁴ Note 16
- ²⁵ *ibid.*
- ²⁶ The Foundational Supports Strategy has not been publicly released and late last year the DSS undertook an extensive public consultation on the structure and nature of Foundational Supports. See Department of Social Services, General Supports Consultation Paper, Commonwealth of Australia, (2024), retrieved from <https://engage.dss.gov.au/wp-content/uploads/2024/09/general-supports-consultation-paper-1.pdf>, accessed on 15 October 2024
- ²⁷ Stephanie Convery, 'Comedy of errors': NDIS reform leaves disabled Australians fearing what comes next, *The Guardian*, 27 January 2025, retrieved from <https://www.theguardian.com/australia-news/2025/jan/27/comedy-of-errors-ndis-reform-leaves-disabled-australians-fearing-what-comes-next>, accessed 27 January 2025
- ²⁸ *ibid.*
- ²⁹ Note 26, definition of "Foundational Supports", p 18
- ³⁰ *ibid.* p 3