

JAS-ANZ Procedure 29

Issue 1



**Requirements for bodies providing audit and certification of
advocacy agencies under the national disability advocacy
program**

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Authority to Issue

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0 Introduction

0.1 Object and field of application

- 0.1.1 This procedure, including the attached Annexes, sets down the requirements (accreditation criteria) for bodies seeking accreditation by the Governing Board of the Joint Accreditation System of Australia and New Zealand (JAS-ANZ), to audit advocacy agencies and certify that they meet the Disability Advocacy Standards (DAS) set down by the Australian government. The advocacy agencies referred to in this procedure are those funded under the Commonwealth Disability Services Act 1986, for the National Disability Advocacy Program (NDAP) administered by the Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA).
- 0.1.2 The focus of the NDAP certification scheme is to ensure that advocacy agencies have appropriate management systems in place which are used to achieve the outcomes identified through the DAS and associated Key Performance Indicators (KPIs). The outcomes identified through the DAS and KPIs define the elements of quality support which should be achieved for people with disability receiving advocacy support. Advocacy agencies will need to comply with, and demonstrate continuous improvement against the DAS and KPIs.
- 0.1.3 Accreditation in conformity with ISO/IEC Guide 65 and the criteria in this procedure acknowledges that bodies possess the necessary competence and reliability to operate a conformity assessment system for advocacy agencies, and will thereby facilitate their acceptance or recognition on a national basis.
- 0.1.4 Only those certification bodies that have been accredited by JAS-ANZ to ISO/IEC Guide 65, IAF Guidance on the Application of ISO/IEC Guide 65 (IAF GD 5:2006) and this procedure shall carry out audits and issue certificates against the DAS. It is the responsibility of an advocacy agency seeking certification to the DAS to verify the accreditation status of the chosen certification body, by either requesting a copy of their accreditation certificate (or acknowledgement of application) and scope; by contacting JAS-ANZ; or by searching the JAS-ANZ Register, which is available on-line at www.jas-anz.org.
- 0.1.5 FaHCSIA may review criteria or set additional criteria, in consultation with all stakeholders. In any case, these criteria will be reviewed within two years after implementation; or as the need arises. Revised or additional criteria will be the subject of an agreement between JAS-ANZ and FaHCSIA and will be regarded as part of these accreditation criteria. Where there is inconsistency between the revised or additional procedure and this procedure, the requirements of the revised or additional procedure will prevail.
- 0.1.6 The criteria against which an advocacy agency is audited shall be those outlined in the DAS relevant to the function performed.

0.2 Background

- 0.2.1 ISO/IEC Guide 65 is an International Standard that sets out the requirements for certification bodies providing audit and certification of product certification systems. The term 'product' includes 'service' and 'process'.
- 0.2.2 To facilitate the uniform interpretation and application of ISO/IEC Guide 65 for audit and certification of advocacy agencies in Australia, this procedure incorporates the work of the JAS-ANZ National Disability Advocacy Program Technical Committee (NDAP TC), aligned with the requirements of ISO/IEC Guide 65, to produce normative criteria, comprising all of this document including the Annexes.

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- 0.2.3 The JAS-ANZ NDAP TC, whose members represent the significantly interested parties, developed these criteria in line with ISO/IEC Guide 65 clause 4.1.3. This procedure shall be read in conjunction with ISO/IEC Guide 65 and IAF GD 5.
- 0.2.4 The term 'should' is used in this document to indicate recognised means of meeting the requirements of the standard. A certification body can meet these in an equivalent way provided this can be demonstrated to JAS-ANZ.
- 0.2.5 The term 'shall' is used in this document to indicate those provisions which, reflecting the requirements of the relevant standard, are mandatory.
- 0.2.6 All the major headings (numbers 1-15) of this procedure have been reproduced from ISO/IEC Guide 65.
- 0.2.7 This procedure does not diminish any of the requirements of ISO/IEC Guide 65. The clause numbers in this procedure are prefixed with the letter 'J' to indicate mandatory criteria developed by the JAS-ANZ NDAP TC for auditing and certifying advocacy agencies.
- 0.2.8 The text of ISO/IEC Guide 65 and IAF GD5:2006 is not included in this document and shall be referred to separately.
- 0.2.9 References in this procedure to specific clauses of ISO/IEC Guide 65 shall be read to mean references to ISO/IEC Guide 65 in conjunction with the IAF GD 5:2006 and the corresponding criteria in this procedure.

Conformity assessment – requirements for bodies providing audit and certification of agencies under the National Disability Advocacy Program

1 Scope

No additional requirements

2 References

- 1993 National Disability Services Standards.
- Disability Advocacy Standards (currently in draft form & thus not yet legislated).
- National Disability Agreement (NDA).
- Disability Discrimination Act (Cwlth) 1992.
- Disability Services Act (Cwlth) 1986.
- IAF GD 5:2006 - Guidance on the Application of ISO/IEC Guide 65:1996; available at www.iaf.nu.
- IAF MD 1:2007 (issue 1) – IAF Mandatory Document for the Certification of Multiple Sites Based on Sampling; available at www.iaf.nu.
- IAF MD 2:2007 (Issue 1) – IAF Mandatory Document for the Transfer of Accredited Certification of Management Systems; available at www.iaf.nu.
- IAF MD 5:2009 (Issue 1) – IAF Mandatory Document for the Duration of QMS and EMS Audits; available at www.iaf.nu.
- ISO/IEC Guide 65:1996 - General requirements for bodies operating product certification systems.
- ISO 19011:2011 - Guidelines for quality and/or environmental management system auditing.
- Privacy Act (Cwlth) 1988 as amended 2000.
- JAS-ANZ Procedure 03 – Rules of procedure governing the use of the accreditation symbol.
- United Nations Convention on the Rights of People with Disabilities; available at <http://www.un.org/disabilities/>.

3 Definitions

J.3.1 The following definitions also apply to this procedure:

<u>Advocacy</u>	supporting people to exercise the rights and freedoms recognised or declared by the United Nations Convention on the Rights of People with Disabilities, or seeking to achieve societal change to ensure that people with disabilities attain the rights and freedoms recognised or declared by the Convention.
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<u>Advocacy agency</u>	advocacy agencies funded by the Australian Government.
<u>Advocacy agency with multiple sites</u>	an advocacy agency with one central office and multiple full-time and/or part-time sites at which activities are fully or partially carried out.
<u>Advocacy models</u>	<p>any of six advocacy models currently funded under the NDAP program:</p> <p>Individual Advocacy</p> <p>Individual advocacy supports people with disability to exercise their rights, through either one-to-one support, or by supporting people to advocate for themselves individually, through a third party or on a group basis.</p> <p>The types of NDAP-funded advocacy that are provided under individual advocacy include but are not limited to: self, family, citizen, and legal:</p> <p>Self-Advocacy</p> <p>Supports people with disability to advocate on their own behalf, to the extent possible, or on a one-to-one or group basis.</p> <p>Family Advocacy</p> <p>Works with parents and family members to enable them to act as advocates with and on behalf of a family member with disability. Family advocates work with parents and family members on either a short-term or an issue-specific basis. Family advocates work within the fundamental principle that the rights and interests of the person with disability are upheld at all times.</p> <p>Citizen Advocacy</p> <p>Seeks to support people with disability (also called protégés) by matching them with volunteers.</p> <p>Legal Advocacy</p> <p>Seeks to uphold the rights and interests of people with all types of disabilities by addressing legal aspects of instances of discrimination, abuse and neglect.</p> <p>Systemic advocacy</p> <p>Seeks to introduce and influence longer term changes to ensure the rights of people with disability are attained and upheld to positively affect the quality of their lives.</p> <p><i>In all these models, the target group of advocacy support is the person with disability.</i></p>
<u>Audit team</u>	a team of at least two persons appointed to conduct an audit. An audit team normally comprises a lead auditor and a CTE. However, while a CTE may also perform the role of lead auditor (or auditor) if appropriately qualified, in that case the audit team shall still comprise at least two persons.
<u>CB</u>	certification body.
<u>Central office</u>	the office of an advocacy agency that has the responsibility to administer its Australian Government's advocacy funding and the right to implement corrective actions at any site. The central office is the central point for the administration of the common management system.

<u>Certification audit</u>	all activities related to the initial certification of an advocacy agency to determine whether the advocacy agency meets the requirements of the DAS.
<u>Certification body</u>	a body accredited as conforming to the criteria specified in this procedure which audits and certifies to the DAS.
<u>Close out</u>	verification by a CB that corrective action has been implemented by an advocacy agency to address a major nonconformity or nonconformity.
<u>Conflict of interest</u>	<p>a relationship between the CB, or a person working for the CB (paid or unpaid, staff or contractor), and an advocacy agency, disability service or person, that threatens the impartiality of the CB. Such relationships apply to past, present or future involvement and include:</p> <ul style="list-style-type: none">a) having worked with, or been a consumer of, or consulted to the advocacy agency in the last two years, or reasonable prospects of such work in the next two yearsb) any financial interest in the advocacy agency or relatives or friends with a financial interest in the advocacy agencyc) being in competition with the advocacy agencyd) any other commercial or voluntary arrangement or directorship with the advocacy agencye) having immediate family members employed by an advocacy agency, or in any of the above situationsf) any personal bias or inclination which would affect decisions in relation to the advocacy agencyg) having worked with or audited a disability service that has been subject to advocacy from the advocacy agency.
<u>Conformity</u>	the requirements of a KPI associated with a DAS are met. See Rating scale .
<u>Consent</u>	the voluntary agreement of a person or a person's authorised representative about a proposed action – e.g. participate in an interview; review personal records.
<u>Consulting</u>	participating in designing, implementing or maintaining an NDAP management system. Note: Identifying opportunities for improvement is not consulting.
<u>Consumer</u>	primarily, a person with disability who is receiving / has received within the last 3 months support from the advocacy agency being audited. Consumer may also mean family member/s or an unpaid primary carer or advocate of that person with disability. Some advocacy agencies may use the terms “client”, “participant”, “service user” etc. in lieu of “consumer”.
<u>Consumer technical expert</u>	a person with disability, engaged for his/her specialist knowledge and abilities; e.g. empathy with the life experience of people with disability, and ability to plan and facilitate the effective input of people with disability in an audit process. A CTE shall provide evidence to the CB of having been a service recipient of a State or Commonwealth funded disability organisation in Australia.
<u>CRRS</u>	Complaints Resolution and Referral Service. The independent and

	impartial service funded by the Australian Government to assist in the resolution of complaints about advocacy agencies, disability employment service providers funded under the Disability Services Act.
<u>CTE</u>	consumer technical expert.
<u>DAS</u>	the Disability Advocacy Standards, plus the relevant Key Performance Indicators (KPIs) define the elements of quality support which should be achieved for people with disability receiving advocacy support from advocacy agencies.
<u>External stakeholder</u>	in the context of Annex C, clauses C.2.10 and C.4.4, a person or other agency that is connected with the work of the advocacy agency.
<u>FaHCSIA</u>	Australian Government Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA), including where acting as administrator of the National Disability Advocacy Program on behalf of the Australian Government.
<u>Full-time site</u>	a service location for an advocacy agency that operates on a full-time basis – normally five days per week during normal working hours (e.g. 8:30 AM to 4:30 PM, Monday to Friday) or more.
<u>IAF</u>	International Accreditation Forum.
<u>IAF GD5: 2006</u>	IAF GD5:2006 - Guidance on the Application of ISO/IEC Guide 65:1996.
<u>Independent advocate</u>	an independent person who can support someone. With respect to consumers and the audit process, an independent person who can support a consumer to participate in the audit process. If an advocate is required during an audit process, in this instance the independent advocate shall not be a paid employee or volunteer of the organization being audited.
<u>JAS-ANZ NDAP TC</u>	JAS-ANZ National Disability Advocacy Program Technical Committee.
<u>KPI</u>	the Key Performance Indicators identify the requirements which need to be demonstrated or measured in order to achieve compliance with each Standard within the DAS.
<u>Major nonconformity</u>	the requirements of a KPI associated with a Disability Advocacy Standard are not met, or the outcome is ineffective. A number of related nonconformities may also constitute a major nonconformity. See Rating scale .
<u>NDAP</u>	National Disability Advocacy Program.
<u>Nonconformity</u>	the requirements of a KPI associated with a Disability Advocacy Standard are not fully met, or the outcome is only partly effective.
<u>Notifiable issue</u>	evidence or allegations of a serious health, safety or abuse risk, financial impropriety and/or professional misconduct.
<u>Ongoing support</u>	advocacy support that is or has been of an ongoing nature and shall not include phone calls or requests for information that are one off in nature only.

<u>Other technical expert</u>	a person other than a CTE who provides specific knowledge or expertise to an audit team, and is engaged by the CB to participate in the audit or relevant part of the audit.
<u>Outcomes</u>	outcomes for the purposes of this Procedure are those identified through the DAS and KPIs which define the elements of quality support which should be achieved for people with disability receiving advocacy support.
<u>Outreach site</u>	a service location for an advocacy agency set up in the premises of another organisation. An outreach site is not permanently open but may operate for a period on a regular basis such as weekly or monthly, or on demand. Outreach sites do not include consumers' private homes.
<u>Part-time site</u>	a permanent service location for an advocacy agency that regularly operates on only some days of the working week or for part of normal working hours on some days.
<u>Person with disability</u>	persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.
<u>Rating scale</u>	<p>the system used to rate conformity of an advocacy agency. Each KPI associated with a Disability Advocacy Standard is to be rated as follows:</p> <ul style="list-style-type: none">a) major nonconformity rating = 0b) nonconformity rating = 1c) conformity rating = 2 <p>A standard is to be rated the same as the lowest rating of any of its associated KPIs.</p>
<u>Self assessment</u>	a critical review, conducted internally, that documents the extent to which the advocacy agency's existing management system (policies, procedures and practices) ensures that they meet the DAS. Self assessments may be conducted by peer organisations.

4 Certification body

4.1 General provisions

J.4.1.1 If an explanation is required for the consistent application of this procedure or reference standards, it shall only be acceptable if approved and published by the JAS-ANZ NDAP TC.

4.2 Organization

J.4.2.1 The CB shall ensure that the structure that safeguards impartiality shall be an impartial committee which includes a CTE and another person with disability.

J.4.2.2 The CB shall have a documented, publicly available policy on handling gifts or hospitality offered by an advocacy agency to which it is contracted to provide certification services.

4.3 Operations

No additional requirements

4.4 Subcontracting

No additional requirements

4.5 Quality system

- J.4.5.1 The CB's procedures for internal audits, required by ISO/IEC Guide 65 Clause 4.5.3 n), shall be based on the provisions of ISO 19011.
- J.4.5.2 The CB shall document monitoring procedures for all audit team members, including CTEs and other technical experts. Procedures shall include on-site observation. The CB should establish the frequency of observation to take account of the criticality and volume of the work being undertaken, the experience and performance history of the audit team members and any data obtained from other types of monitoring activity such as review of audit reports and client feedback.

4.6 Conditions and procedures for granting, maintaining, extending, suspending and withdrawing certification

- J.4.6.1 For the initial certification, the CB shall confirm that the agency has:
- implemented its policies and procedures
 - implemented a program for conducting self assessments covering its compliance with all the DAS standards and KPIs during the certification cycle
 - completed at least one self assessment.
- J.4.6.2 The CB shall have documented procedures that shall be made available on request for:
- the certification, surveillance and recertification audits of an advocacy agency (including reporting), in accordance with the provisions of ISO 19011
 - identifying and recording nonconformities and the need for appropriate corrective action by advocacy agencies.

4.7 Internal audits and management reviews

No additional requirements

4.8 Documentation

- J.4.8.1 CBs shall include the following in public information:
- consumers will be offered information about the audit process and independent advocacy support to engage in the process prior to any consent being obtained
 - participation by consumers in audits is at all times voluntary and shall be based on the principle of consent. Where possible, a consumer's consent for interview shall also grant permission for the audit team to review that consumer's file. It is desirable to obtain consents in writing. Where the capacity of a consumer to provide consent is uncertain, an independent advocate should be involved to determine that capacity and to support an appropriate level of involvement by the consumer. Where written consent is not obtained, the reason for this, and evidence supporting the assumption that consent was sought and has been obtained, should be recorded in file notes
 - consumers shall be invited by their advocacy agency to both the opening and closing meetings of all audits
 - the process for transferring certification shall be in accordance with IAF MD 2:2007

4.9 Records

- J.4.9.1 The CB's records shall include the following information:
- a) clear, up to date documentation of the supporting information and rationale for all decisions to sample advocacy agencies with multiple sites
 - b) sufficient information to trace all on-site audit durations, and the basis for the calculations
 - c) justification for, and documentation of any departure from the requirements in the Annexes
 - d) the number of consumers consulted during each audit and the methods of consultation
 - e) how it ensured that consumers provided their consent to participate in the audit and for the CB to access their files

4.10 Confidentiality

- J.4.10.1 The CB shall treat all information about an advocacy agency, comprising documentation, records, data either in hard copy or electronic format, or verbal information that comes into the possession of a CB or any of its representatives in accordance with the Privacy Act and any relevant state or territory legislation.
- J.4.10.2 The CB shall not disclose information about a consumer of an advocacy agency that is identifiable directly or indirectly to that consumer without the written consent of that person, unless required by law. Where written consent is unobtainable or impracticable, the consumer shall be supported by a family member, carer, guardian or advocate empowered to make an informed decision about consent.
- J.4.10.3 The CB shall not use information about a consumer for any purpose other than the assessment of conformity with the DAS.
- J.4.10.4 Where the CB wishes to disclose information about an agency (other than a notifiable issue – see clause J.10.6) to FaHCSIA it must first seek the agency's permission. If permission is denied it may still disclose this information to FaHCSIA if it takes the view that to do so would be in the best interests of the agency consumers.

5 Certification body personnel

5.1 General

- J.5.1.1 Auditors shall meet the guidance for competence of auditors in ISO 19011.
- J.5.1.2 The CB shall have processes to ensure that personnel have appropriate knowledge. It shall determine and define the competence required for each function in the certification activity, including functions undertaken by management and administrative personnel, as well as audit and certification activities.

5.2 Qualification criteria

- J.5.2.1 All audit personnel shall comply with the code of ethics. See Annex D.
- J.5.2.2 All audit team members shall have experience and/or training in disability services auditing or evaluation.
- J.5.2.3 All audit team members shall demonstrate that they have the following knowledge and skills:
- a) understanding of the legislative and regulatory requirements applicable to advocacy agencies, including the DAS

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- b) understanding of the nature of advocacy, the NDAP quality assurance system and the role of people with disability and other stakeholders in quality processes
 - c) understanding of the diversity of advocacy agency models and organisational structures and how this impacts on management practices
 - d) understanding of the diversity of people using advocacy agencies and their needs in relation to the audit process
 - e) ability to communicate effectively in writing or orally or using alternative communication systems with all parties involved in the audit process
 - f) ability to gather, review and report on evidence against the DAS.
- J.5.2.4 CTEs shall have the personal attributes listed in ISO 19011.
- J.5.2.5 All auditors and CTEs shall successfully complete the training required by FaHCSIA, which includes the nature of advocacy and advocacy models, and an understanding of the DAS, KPIs and Evidence Guidelines, before auditing in the system.
- J.5.2.6 All audit team members shall have a current national police check, along with all necessary checks required by state or territory legislation before working with children or vulnerable people.
- J.5.2.7 Where an advocacy agency been audited to another set of service standards by a JAS-ANZ accredited auditor and holds a current accredited certification to those standards, the CB shall consider the extent of the demonstrated conformance for any common or significantly similar criteria and rely on this to avoid audit duplication. Every audit report shall record any eligible audit report and the criteria partially or fully relied upon.
- J.5.2.8 When selecting the audit team for any on-site audit, the CB shall ensure that the skills brought to each assignment are appropriate. The team shall:
- a) as a minimum comprise two people, i.e. a two person team is required even if the lead auditor is also a CTE. In deciding the size and composition of the audit team and the need (if any) for other technical experts (in addition to the CTE), consideration shall always be given to the range of disabilities and consumer communication styles likely to be encountered during the audit
 - b) understand the geographic or cultural context in which the advocacy agency operates
 - c) inform the CB, prior to the audit, of any potential, current or perceived conflict of interest they have in conducting the audit
- J.5.2.9 The CB shall provide appropriate training and support to assist the CTE to function effectively in the audit team. Such training may include auditor training or lead auditor training where appropriate. A supervising auditor or lead auditor shall always provide ongoing supervision to maintain the necessary level of communication and support to the CTE and other technical expert(s). The CB shall evaluate the competence of the CTE and other technical expert(s) to interview consumers face-to-face or by telephone without other members of the audit team present **before** authorising them to do so. The CB shall keep records of this evaluation.

6 Changes in certification requirements

No additional requirements

7 Appeals, complaints and disputes

- J.7.1.1 The CB shall include a CTE in each appeal hearing.

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- J.7.1.2 The CB shall have a documented process to receive, evaluate and make decisions on complaints.
- J.7.1.3 The complaints-handling process shall include at least the following elements and methods:
- a) an outline of the process for receiving and investigating a complaint, and for deciding what actions are to be taken in response to it
 - b) a system for tracking and recording complaints, including actions undertaken in response to them
 - c) a system to ensure that any appropriate corrective action is taken.
- J.7.1.4 The decision to be communicated to the complainant shall be made by, or reviewed and approved by, individual(s) not previously involved in the subject of the complaint.
- J.7.1.5 The CB shall copy matters referred to it by FaHCSIA into its complaints system and action them according to its procedures for handling complaints.

8 Application for certification

8.1 Information on the procedure

No additional requirements

8.2 The application

- J.8.2.1 The CB shall require the advocacy agency to supply the following information:
- a) the scope of the management system, services delivered and location(s) of the advocacy agency
 - b) a copy of its documented policies and procedures relating to its management system
 - c) a copy of the latest self assessment
 - d) a copy of its current funding agreement with FaHCSIA
- J.8.2.2 The CB shall have a legally enforceable agreement for providing certification services to the advocacy agency. The agreement shall:
- a) extend to all the sites covered by the scope of a multiple site certification
 - b) require the advocacy agency to inform it of the opening or closing of a site. A CB may seek confirmation from FaHCSIA of the number of sites an advocacy agency delivers services from
 - c) require the advocacy agency to make available to the CB the records of all communications and action taken in relation to the requirements of the DAS. This includes correspondence, recommendations and actions documented by the CRRS or FaHCSIA; or correspondence with any other advocacy agency or disability service provider relating to complaints about the advocacy agency seeking certification.

9 Preparation for evaluation

- J.9.2.1 The audit program shall include an initial audit and periodic surveillance and recertification audits. See Clause 13.

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- J.9.2.2 The CB shall plan audits to allow sufficient time and resources for the activities listed at Clause J.10.8; e.g. to report compliance against each KPI, and to fully comply with the reporting requirements in this procedure.
- J.9.2.3 The CB should commence planning with the advocacy agency as early as possible to ensure adequate consumer participation.
- J.9.2.4 The CB shall send the advocacy agency the list of suggested consumer participants as early as possible, to ensure that the advocacy agency has adequate time to arrange interviews.
- J.9.2.5 The CB shall ensure that the CTE has discussions with the advocacy agency about the support needs and sensitivities of the selected consumers as early as possible, to ensure the advocacy agency has adequate time to prepare for the Stage 2 audit.
- J.9.2.6 The CB shall follow up at audit any matters referred to it by FaHCSIA that relate to conformity with the DAS or to a potential notifiable issue, and provide any further information on them to FaHCSIA if requested.
- J.9.2.7 The CB shall inform the advocacy agency of the names of the members of the audit team who will carry out the audit, with sufficient notice to appeal against the appointment of any particular auditor, CTE or technical expert. The CB shall seek the advocacy agency's agreement to the audit plans prior to conducting the audit.
- J.9.2.8 The CB shall provide the advocacy agency with a list of all the disability organisations that it audits. If the agency subsequently perceives a potential conflict of interest and wishes to choose another CB to provide certification services, the CB shall respect the agency's decision.
- J.9.2.9 The CB shall check that the advocacy agency has invited consumers to the opening and closing meetings of all audits.
- J.9.2.10 The CB shall have documented procedures for reviewing applications. In particular, and as part of the review process applied to each application for certification, the CB shall:
- a) review the outcomes of observations and discussions during any pre-audit site visits
 - b) review any legal requirements that may impact on the advocacy agency's management system
 - c) confirm the availability of the required audit team competencies
 - d) calculate the audit duration in accordance with Annex A (single site) or Annex B (multi-site) as applicable
 - e) plan its sampling of an advocacy agency with multiple sites in accordance with Annex B
 - f) make appropriate arrangements for seeking consumer feedback in accordance with Annex C.
- J.9.2.11 Where a single site advocacy agency (or any site of a multi-site advocacy agency) provides multiple advocacy models, the CB shall always sample consumers from every advocacy model. The time spent auditing the different advocacy models (and hence the number of consumers / stakeholders sampled per model) should be proportional to the level of funding provided for each model.

10 Evaluation

- J.10.1 The CB shall perform the initial audit in a 2 stage process. The CB may conduct the stage 1 audit remotely. During the stage 1 audit, the CB shall:
- a) review the advocacy agency's policies and procedures for complying with the DAS including its self assessment

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- b) evaluate the advocacy agency's logistical needs and preparedness for the stage 2 audit
- J.10.2 The CB shall document stage 1 audit findings and communicate them to the advocacy agency before the stage 2 audit, identifying any areas of concern that could be classified as nonconformities during the stage 2 audit.
- J.10.3 The Stage 2 audit shall not proceed until the advocacy agency advises the CB that they are ready to proceed and the CB agrees. In determining the interval between stage 1 and stage 2 audits, the CB shall consider whether the advocacy agency wishes to resolve areas of concern identified during the stage 1 audit before the stage 2 audit can proceed.
- J.10.4 The purpose of the stage 2 audit is to evaluate the implementation and effectiveness of the advocacy agency's management system. The stage 2 audit shall take place at the site(s) of the advocacy agency. During the stage 2 audit, the CB shall at least evaluate the evidence to demonstrate the advocacy agency's effective implementation of their policies, procedures and practices to comply with the DAS.
- J.10.5 The CTE shall actively participate in the following audit activities with other team members and this involvement shall be traceable via reports or other documents on the CB's files:
- a) developing and agreeing the final audit plan and reviewing the stage 1 audit findings
 - b) planning and preparing the methods of consumer participation in the audit and evaluating the need for independent support for consumers
 - c) participating for the full duration of the stage 2 audit, including the opening meeting, audit team review meeting(s) and closing meeting. If the stage 1 audit is done on site, the CTE shall be present for the duration of the visit
 - d) engaging consumers during the audit to collect, examine and analyse evidence with respect to the DAS
 - e) reviewing consumer files or following up issues with consumers
 - f) reviewing audit findings, determining audit ratings and preparing the written audit report
- J.10.6 If an audit team finds evidence of a notifiable issue, the CB's procedures shall require it to record the details, and to immediately notify the advocacy agency's manager (unless there is justifiable reason for not doing so, such as a risk of compromising collection of evidence in subsequent investigations), and FaHCSIA.
- J.10.7 The CB is not responsible for resolving a notifiable issue, but shall report the evidence. Certification cannot proceed until FaHCSIA advises the CB that the notifiable issue is resolved. If the advocacy agency is already certified, the CB shall seek advice from FaHCSIA.
- J.10.8 At all on-site audits the audit team shall hold a closing meeting with the advocacy agency's management and any consumers who wish to be involved, prior to concluding the on-site audit. At the closing meeting, the audit team shall:
- a) explain its initial audit findings regarding the conformity of the advocacy agency with each standard and KPI
 - b) if applicable, provide the advocacy agency with documented major nonconformities and nonconformities, including the DAS KPIs they relate to, explanatory comments, and the close out dates
 - c) summarise any notifiable issue raised during the audit, unless there is justifiable reason for not doing so - see Clause J.10.6
 - d) summarise any audit follow-up activities

- e) briefly summarise all the available avenues for resolving complaints and appeals including via the CB, CRRS or JAS-ANZ
- f) summarise the timing of, and requirements for, preparing for and conducting surveillance and recertification audits

11 Evaluation report

- J.11.1 Written reports of DAS on-site audits require more than generic summary statements. The content of all reports shall include:
- a) a brief description of the advocacy agency, including the advocacy model(s) offered
 - b) the number and roles of stakeholders consulted with during each audit, including the model of advocacy accessed by them (eg. individual, systemic, citizen etc.) and methods of consultation
 - c) an executive summary of the overall findings (conclusions) of the audit, including comments on the effectiveness of the advocacy agency's system to ensure conformity with the DAS and a summary of major nonconformities and nonconformities **at on-site audit completion**, even if the agency has addressed nonconformities before the report is finalised
 - d) ratings of conformity against each KPI and each standard, in accordance with the rating scale
 - e) an adequate description of the main evidence and audit trails to support the ratings of KPIs
 - f) positive and negative observations; noting that while negative observations (eg. opportunities for improvement) do not prevent certification, CBs should advise advocacy agencies to carefully consider them and address them wherever possible, to ensure that conformity is not compromised in the future
 - g) times allocated for stage 1 and stage 2 audits, the number and type of interviews with consumers.
- J.11.2 Where applicable, reports of surveillance or recertification audits shall document:
- a) close out of each major nonconformity and nonconformity revealed previously
 - b) any useful comparison with the results of previous audits
- J.11.3 The CB shall prepare stand-alone reports of any follow-up audits outlining any major nonconformity or nonconformity and clearly documenting the evidence provided to support decisions to close them out or downgrade them. It is not acceptable to report follow up activity as an amendment to the original audit report.
- J.11.4 In an audit that covers more than one type of certification standard (e.g. ISO 9001 in addition to the DAS), the report shall clearly identify all requirements of the DAS.
- J.11.5 The CB shall provide the draft written report to the advocacy agency within 10 working days of completing the on-site component of the audit (single site agency) or 20 working days (multiple site agency), even if the draft decision is not to certify.
- J.11.6 The advocacy agency shall have 10 working days from receiving the draft written report in which to provide a response to the CB.
- J.11.7 The CB shall consider any response provided by the advocacy agency, make the final certification decision and provide the final report to FaHCSIA and the advocacy agency within a further seven working days, even if the decision is not to certify.
- J.11.8 The CB's procedures shall ensure that in the instance of a major nonconformity:
- a) the major nonconformity is closed out before certification or expiry of certification

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- b) close out shall normally require a follow-up visit by the CB. For a certified advocacy agency, evidence of a corrective action plan shall be presented to the CB within 5 working days of the date of issue of the major nonconformity, and close out shall normally require a follow-up visit by the CB within three months
 - c) the CB shall be able to justify circumstances where close out of a major nonconformity, or downgrading the major nonconformity to a nonconformity did not require a follow-up visit
 - d) for a certified advocacy agency, failure to close out the major nonconformity within three months of the date of issue, or take action sufficient to downgrade the major nonconformity to a nonconformity, shall result in automatic suspension of certification
 - e) for a certified advocacy agency, if the major nonconformity is downgraded to a nonconformity, that nonconformity shall be closed out within a further three months (maximum of six months from the date of issue to fully action a major nonconformity)
- J.11.9 The CB's procedures shall ensure that in the instance of a nonconformity:
- a) the nonconformity is closed out before certification or expiry of certification
 - b) for a certified advocacy agency, the nonconformity shall be closed out within six months of the date of issue
 - c) for a certified advocacy agency, failure to close out a nonconformity within six months of the date of issue will result in a major nonconformity being raised with the advocacy agency's corrective action process

12 Decision on certification

- J.12.1 The CB shall make decisions on renewing certification based on the results of the recertification audit, as well as the results of its review of the system over the period of certification, and complaints received.
- J.12.2 If an audit team submits advice of a notifiable issue to FaHCSIA, the CB shall withhold the advocacy agency's certification until FaHCSIA advises it in writing that certification can proceed.
- J.12.3 The CB shall advise FaHCSIA of all certification decisions within 5 working days of the date of the decision. The CB shall provide FaHCSIA with reasons for any decisions to vary, suspend or withdraw certification, together with a copy of the certification document(s).
- J.12.4 The CB shall include a CTE in the certification decision-making process.
- J.12.5 Certification documents shall include:
- a) the effective date of certification which shall be on or after the date of the formal decision by the CB
 - b) the expiry date or recertification due date consistent with the recertification cycle
 - c) the JAS-ANZ symbol. Refer to JAS-ANZ Procedure 3
- J.12.6 If an advocacy agency ceases to provide advocacy support or FaHCSIA revokes its funding for any reason, FaHCSIA will notify JAS-ANZ and the CB that issued certification within 10 working days of revocation becoming effective.

13 Surveillance

- J.13.1 In the context of this procedure, 'surveillance' includes surveillance audits in the first and second years of a three-year certification cycle, and a recertification audit in the third year prior to expiration of certification. The cycle begins with the certification or recertification decision.
- J.13.2 Surveillance and recertification audits are on-site audits and shall be planned together with any other surveillance activities so that the CB can maintain confidence that the certified services continue to fulfil requirements.
- J.13.3 Once certification is achieved, the date of the first surveillance audit shall not be more than 12 months from the date of the last day of the on-site component of the certification or recertification audit. The second surveillance audit shall be conducted not more than 13 months after the last day of the first surveillance audit.
- J.13.4 Surveillance audits shall include:
- a) reviewing the effectiveness of actions taken on nonconformities identified during the previous audit
 - b) progress of planned activities aimed at continual improvement of performance against the DAS
 - c) continuing operational control
 - d) review of any changes to systems or personnel
 - e) standards 2, 7, 8, and 12 and other selected standards
 - f) use of marks and/or any other reference to certification
 - g) interviewing the responsible managers and a sample of consumers in accordance with Annex C
- J.13.5 Following a surveillance audit, the CB shall maintain certification based on demonstration that the advocacy agency continues to satisfy the requirements of the DAS. It may rely on a positive conclusion by the audit team leader without further independent review, provided that:
- a) for any major nonconformity or other situation that may lead to suspension or withdrawal of certification, the CB has a system that requires the audit team leader to report to the CB the need to initiate a review by appropriately competent personnel, different from those who carried out the audit, to determine whether certification can be maintained
 - b) competent personnel of the CB monitor its surveillance activities, including monitoring the reporting by its auditors, to confirm that the certification activity is operating effectively
- J.13.6 The purpose of the recertification audit is to confirm the continued conformity and effectiveness of the advocacy agency's system against the DAS as a whole. The recertification audit shall consider the performance of the system over the period of certification, and include a review of previous surveillance audit reports.
- J.13.7 Recertification audit activities may need to have a stage 1 audit in situations where there have been significant changes to the management system, the client, or the context in which the management system is operating (e.g. changes to legislation).
- J.13.8 The recertification audit shall include an on-site audit that addresses the following:
- a) the scope of the management system in its entirety in the light of internal and external changes and its continued relevance to the requirements of the DAS
 - b) evidence to demonstrate the advocacy agency's effective implementation of their policies, procedures and practices to comply with the DAS including positive outcomes for consumers

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- J.13.9 When, during a recertification audit, instances of nonconformity or lack of evidence of conformity are identified, the CB shall define time limits for correction and corrective actions to be implemented prior to the expiry of certification.

14 Use of licences, certificates and marks of conformity

No additional requirements

15 Complaints to suppliers

- J.15.1 In the context of this procedure, a 'supplier' is an advocacy agency. Complaints to advocacy agencies include records of all communications and action taken in relation to the requirements of the DAS. See clause J.8.2.2.

Annex A - Audit Duration

- A.1 Planning for an audit of an advocacy agency will typically take longer than planning for other types of audits (such as ISO 9001) and large individual variations are likely to occur. This is partly due to the complexities of sourcing information and obtaining the necessary consents to arrange effective and representative consumer sampling.
- A.2 The on-site audit duration for the stage 2 audit of a single site advocacy agency shall be not less than one auditor day, and is expected to fall in the range of one to five auditor days. The duration will depend on a number of factors. The CB shall have a procedure for determining the amount of audit time necessary, based on the relevant requirements of IAF MD5:2009 and the following factors:
- a) an advocacy agency's existing accredited certification to another standard
 - b) results of self assessments conducted by the advocacy agency in the last 12 months
 - c) the number and type(s) of advocacy models delivered
 - d) number of consumers attached to the agency, if any (see C.2.10)
 - e) types of disability of the consumers
 - f) geographic location of consumers
 - g) consumers' preferred method of engagement (e.g. interview at home, by telephone, group setting)
 - h) level and type of support needed by consumers to enable them to participate in the audit including access to appropriate methods of communication
 - i) ratio of staff to consumers.
- A.3 The CB shall demonstrate that in planning the audit with the advocacy agency it has undertaken a thorough analysis of the above factors and developed an appropriate process for engaging consumers. This process shall be based on the strategy provided to the CB by the advocacy agency. See Annex C.
- A.4 Audit duration calculations (i.e. auditor days) shall be based on an 8 hour working day including 1 hour for lunch, and exclude all activities other than auditing. The times are to be regarded as true minimums: planning, preparation, travel time and reporting shall not be included. Time spent conducting the document review or other stage 1 audit activities shall not be included, even if done on-site. The same applies to on-site report writing. The CB may arrive at the required audit duration by working part-time hours to suit the advocacy agency.
- A.5 Where two or more team members work together (e.g. auditor plus CTE or other technical expert or another auditor), that time shall be counted as if a single auditor was involved. When, in exceptional circumstances, CTEs work alone (see Clause J.5.2.10), that time shall not be counted as contributing to the audit duration, **unless the CTE is also qualified as an auditor or lead auditor.**
- A.6 Where two or more auditors are used along with one CTE, the CB shall demonstrate that the CTE has adequate time to conduct the required amount of consumer interviews and meet the requirements of Clause J.10.5.

Annex B - Certification of advocacy agencies with multiple sites

B.1 Introduction

- B.1.1 Auditing an advocacy agency with multiple service outlets differs from a single-site audit. The aim of this Annex is to establish criteria for the audit and, if appropriate, the certification of advocacy agencies with a network of full-time and/or part-time sites, thus ensuring that the audit provides adequate confidence in the conformity of the advocacy agency, while being practical and economically feasible.
- B.1.2 The requirements of IAF MD 1:2007 apply except as otherwise indicated in this Annex.

B.2 Structure of advocacy agencies with multiple sites

- B.2.1 Advocacy agencies with multiple sites include:
- a) multiple sites delivering a single advocacy approach
 - b) multiple sites delivering one or more advocacy approaches from each site.
- B.2.2 Some advocacy agencies may make use of outreach sites. These sites shall be sampled in accordance with the requirements of this Annex, but do not need to be visited if the advocacy agency can provide evidence that services provided at the outreach sites meet the DAS, and if information, including policies, procedures, and consumer files and individual plans associated with an outreach site can be provided to the CB for physical sampling remotely. If this evidence cannot be provided, the CB shall sample and visit outreach sites as if they were full-time or part-time sites.

B.3 Eligibility criteria for the advocacy agency

- B.3.1 The advocacy agency's management system shall be centrally administered under a centrally controlled plan and be subject to self assessment. All the sites (including the central office) shall be assessed under the advocacy agency's self assessment program before the CB starts its audit.
- B.3.2 The advocacy agency shall demonstrate that it has established a system that complies with the DAS and that the entire network of sites meets the requirements of the DAS.
- B.3.3 The advocacy agency shall demonstrate its ability to collect and analyse data (including but not limited to the items listed below) from all sites including the central office, and its authority and ability to initiate organisational change if required:
- a) system documentation and system changes
 - b) handling of complaints
 - c) evaluation of corrective actions
 - d) self assessment planning and evaluation of the results
 - e) consumer engagement.

B.4 Sampling methodology for advocacy agencies with multiple sites

- B.4.1 The site selection criteria should include:
- a) results of self assessments by the advocacy agency or previous audits by the CB
 - b) records of complaints and communications (see clause J.8.2.2) and other relevant aspects of corrective and preventive action
 - c) significant variations in the size of the sites and number of consumers
 - d) the advocacy models delivered
 - e) modifications since the last CB audit
 - f) geographical location and dispersion.

B.5 Size of sample

- B.5.1 The minimum number of non-central office sites to be visited per audit is:
- initial audit and recertification audit: the size of the sample shall not be less than the square root of the number of full-time and part-time sites ($y = \sqrt{x}$), rounded to the upper whole number.
- surveillance audit: the size of the annual sample shall not be less than the square root of the number of full-time and part-time sites with 0.6 as a coefficient ($y = 0.6 \sqrt{x}$), rounded to the upper whole number.
- B.5.2 In all audits, the central office shall be visited at least once, in addition to the sites sampled.
- B.5.3 The size of the sample shall be increased where the CB's analysis of the advocacy agency indicates special circumstances such as might apply to any of the site selection criteria at clause B.4.1.
- B.5.4 Where one or more sites of a multi-site advocacy agency delivers more than one advocacy model, the CB shall sample the models in accordance with Clause J.9.2.11.
- B.5.5 Where the advocacy agency also has a hierarchical structure and would otherwise be sampled at each level, the sampling model which results in the largest sample shall be applied.

B.6 Audit duration

- B.6.1 The **stage 2 audit** duration for an advocacy agency with multiple sites shall be not less than two auditor days, and is expected to fall in the range of two to six auditor days. See Annex A for requirements applying to auditor days.

B.7 Additional sites

- B.7.1 Where a certified multi-site advocacy agency wishes to include new sites in the scope of its certification, the CB shall require it to provide sufficient information to demonstrate that its management system has been fully implemented in the new sites so as to meet the requirements of the DAS. Each new group of sites should be considered as an independent set to determine the sample size, with those chosen for audit to be included during the next scheduled audit activity. The CB need not conduct additional audits, or move forward the next scheduled audit, solely due to the operation of additional sites by an advocacy agency.

Annex C - Audit planning and consumer sampling

C.1 Introduction

- C.1.1 Seeking direct feedback from consumers is a critical element of the audit process. CBs shall ensure that wherever possible, consumers have been offered the opportunity to participate in the audit process. However it is not usually practicable for all consumers to provide direct feedback, and for this reason a sampling approach is normally required to ensure appropriate levels and types of feedback during the audit.
- C.1.2 The CB should select the sample of consumers to be interviewed. This ensures that the sample is not influenced by other stakeholders which might inhibit the collection of accurate data.

C.2 Sampling principles

- C.2.1 Consumer sampling shall be determined at the site level on a case-by-case basis.
- C.2.2 CBs may sample from all consumers who have received ongoing support, where the agency has contact details.
- C.2.3 A proposed strategy for sampling consumers should be developed by the advocacy agency in consultation with relevant stakeholders, and negotiated with the CB, so that the CB may quote for certification services. This strategy shall be made available to other CBs, on request.
- C.2.4 Ideally, emphasis should be placed on the agency inviting consumers to participate in the audit and in turn, the CB should select from a list of willing participants.
- C.2.5 The CB shall negotiate the proposed sample numbers and sampling approach, including methods of communication and sampling methods (face-to-face interview, focus groups, telephone survey, mail survey) with the advocacy agency when planning the audit.
- C.2.6 CBs should maintain a flexible approach to consumer involvement methods, ensuring that priority is given to methods encompassing direct communication.
- C.2.7 In sampling consumers, the CB shall have regard to the vulnerability of some consumers which may lead them to be unable to participate.
- C.2.8 The CB shall ensure that the sampling approach is appropriate to the service delivery context of the advocacy agency. An advocacy agency with a small number of consumers would not need an extensive consultation mechanism around sampling.
- C.2.9 The CB shall attempt to represent the demographics of the consumers assisted by the advocacy agency, when sampling consumers. Some of the demographics to consider are:
- a) disability type
 - b) gender
 - c) age
 - d) cultural or language differences
 - e) complexity of support needs, including communication
 - f) length of tenure with organisation (includes those exited).
- C.2.10 Although the key focus of this Annex is on sampling consumers, in the case of systemic advocacy, CBs will need to sample consumers who are associated with the systemic advocacy work of the agency through stakeholder committees and groups. Where such consumers are not available, the CB should sample other external stakeholders connected with the advocacy work.
- C.2.11 Where an advocacy agency delivers more than one advocacy model, the CB shall sample consumers receiving each model of advocacy in accordance with Clause J.9.2.11.

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- C.2.12 The sampling approach does not preclude consumers talking to an audit team member if the opportunity arises and they choose to during an audit.
- C.2.13 The CB shall verify that the advocacy agency has:
- a) developed the sampling approach in consultation with relevant stakeholders
 - b) made all reasonable attempts to inform all its consumers in accessible and varying formats of all scheduled audits and provide them with an opportunity to participate in the process and in the consumer sample
 - c) made it clear to all consumers that they are entitled to involve an independent advocate or support person of their choice in the audit process if they wish.

C.3 Process for determining consumer sample size

- C.3.1 Noting that consumers have the right not to be involved, the minimum number of consumers to be sampled for an audit of an advocacy agency (or per site, for a multi-site advocacy agency) is:
- a) initial and recertification audits: the square root of the number of consumers receiving advocacy support over the last three months ($y = \sqrt{x}$), rounded to the upper whole number
 - b) surveillance audit: 0.6 times the square root of the number of consumers receiving advocacy support over the last three months ($y = 0.6 \sqrt{x}$), rounded to the upper whole number.
- C.3.2 The CB should aim for a minimum of 5, and a maximum of 10 consumers per advocacy model and per site.
- C.3.3 The CB should aim to have one to one direct contact with 50% of the proposed sample of consumers. It is understood that in the advocacy context, many of these interviews will be conducted via telephone or other technologies, as consumers are not normally present on site at advocacy agencies. In using some technologies, CBs shall be mindful of the possibility of others accessing the conversations, and shall take steps to ensure confidentiality is maintained in remote interview situations. However, one to one face to face interviews are preferable to remote interviews, where practicable. If the 50% ratio cannot be achieved (e.g. refusals or clear preference by consumers for another consultation method), the CB shall clearly document its justification for the sampling approaches used. The remaining 50% may be sampled using other methods including:
- a) focus group
 - b) written survey
 - c) other innovative ways to involve consumers.

C.4 Consumer file sampling

- C.4.1 Consumer file sampling aims to cross check verbal information gathered from consumers and to confirm outcomes for consumers. However, there will be times when consumers agree to be interviewed, but not to allow access to their files; and vice versa. While the principles applying to consumer sampling also initially apply to file sampling, the CB may also need to follow up on file specific issues identified during interviews with consumers or others. This requires wider access to files, and the CB shall try to obtain appropriate additional consents, to maximise the number of files available for review.
- C.4.2 To ensure validity of the audit, files reviewed at each site should normally cover all of the consumers sampled and should not be less than the number of consumers interviewed.
- C.4.3 All file access shall be by consent by the consumer and shall comply with the provisions of the Privacy Act and any relevant state or territory legislation.
- C.4.4 Where advocacy agencies deliver advocacy models where no consumers are attached to the agency, sampling consumer files is not applicable for those models. See clause

C.2.10. In this case CBs shall sample whatever documents or records are available to cross-check information gathered in interviews of external stakeholders.

C.5 Traceability of audit planning and consumer sampling processes

C.5.1 A CB shall be able to justify how it samples consumers for any audit. Any reduction in the sample size shall be justified and documented in each case (e.g. where an insufficient number of consumer consents are received). The CB shall pay particular attention to the validity of the results of the audit where the sample size is likely to be 30% or more below the numbers which would apply using the above sampling approaches. If in doubt about the validity, advice should be sought from FaHCSIA before the audit begins.

C.5.2 Sampling strategies shall be sufficiently documented for each audit so as to be able to trace compliance with all the requirements of this Annex. This information may be included in, or attached to the audit plan, or may be separately recorded.

Annex D - Code of Ethics

- D.1 Auditors, CTEs, other technical experts and staff of CBs must abide by this code of ethics when auditing within the Disability Advocacy sector.
- D.2 Audit team selection, ongoing work and training should be inclusive and supportive of the unique needs and talents of people with disability, as per the Disability Discrimination Act. Depending on the circumstances, this may include, but is not limited to:
- a) providing accessible information through Braille, Auslan interpreters, Easy English or a support person
 - b) providing an accessible workplace, noting that some modifications to the office environment and equipment can be purchased under the government-run Workplace Modifications Scheme
 - c) ensuring that all CB staff are given some information on disability awareness as part of their induction, and those who require it, such as human resources personnel, are given more in-depth training as required
 - d) working collaboratively with people with disability to ensure that they are given meaningful roles within the organisation in which their input and feedback can be valued and used in a positive and constructive manner. For example, this could be achieved through offering structured peer support and mentoring, or engaging with an independent advocate to resolve any work-related issues. An independent advocate of a staff member's choice should always be allowed to assist them to resolve work-related matters when requested, and all staff members should be aware of this option
 - e) developing a Disability Action Plan and submitting it to the Australian Human Rights Commission.
- D.3 CBs should document all requests for modifications and adaptations by people with disability in an interview or as part of their job or training (e.g. asking for an interpreter or large print documents), along with the outcomes of the requests.
- D.4 CBs should be mindful of the human rights of people with disability as outlined in the United Nations Convention on the Rights of People with Disabilities, in particular the Principles and Objectives, and Articles (<http://www.un.org/disabilities/>).
- D.5 CBs should be considerate of the working hours of advocacy agency staff when planning the audit.
- D.6 The CB should promote available complaint mechanisms to advocacy agencies and participating consumers.
- D.7 During the audit:
- a) all consumers have the right and opportunity to be involved and consulted at no substantive cost to themselves
 - b) consumers have the right not to be involved
 - c) consumers' confidentiality and privacy shall be respected in all aspects of the audit including communications in person and remote communication via technology such as video conferencing
 - d) the CB should encourage sampling methods that maximise the confidentiality of participants
 - e) the CB shall ensure that the advocacy agency has invited consumer representation at the opening and closing meetings of all audits

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- f) the CB shall ensure that the advocacy agency has advised consumers about opportunities to participate in the audit, including opportunities for family, other support or guardians to participate
 - g) the CB shall ensure that people with disability receive timely and accessible information about the audit process to allow for full and informed contribution
 - h) consumers have the right to independent advocacy and support to assist with having their say
 - i) consumers should have appropriate support to facilitate genuine participation.
- D.8 The CB shall facilitate transfer of certification if requested by an advocacy agency it has certified. It shall not revoke certification simply because an advocacy agency advises of its intent to change its CB.
- D.9 CBs and their staff (external or internal) should promote the benefits of the National Disability Advocacy Program to all interested parties, and not openly criticise the Government's initiatives in this sector. CBs should actively participate in the continuous improvement of the Program by identifying and raising issues with the relevant infrastructure element, i.e. FaHCSIA or JAS-ANZ.
- D.10 Auditors, CTEs, other technical experts and staff of CBs involved in audits within the disability sector must be free of conflicts of interest.