**National Disability Employment Framework Submission**

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**Improving Outcomes For People With Disability**

I’m of the opinion that if the government wants the private sector to lift its game with regards increasing employment opportunities for jobseekers with disability, then it needs to reverse the recent downward trends in public sector employment of people with disability and lead by example.

Perhaps it’s time to try the more European approach of employment quotas, with public and private sector employers having the option of paying sanctions/fines for non-compliance and this money going towards government-funded disability employment initiatives.

**Better Workplace Support**

The “Ongoing Support” component of the current DES system is too narrowly defined and its exclusion of “career development” from its definition leads to negative consequences for individuals with disability and aberrant behaviours by DES providers such as leaving people dissatisfied in dead end jobs or underemployed in casual and part-time jobs, or making them quit or get sacked before helping them find another or better job.

There needs to be a broadened definition of “ongoing support” that includes career development through vocational education, work experience and job search assistance for alternative employment. This would bring it in line with the person-centred philosophy of the NDIS as well as meeting the requirements of the Disability Services Standard on Individual Need .

**Support for Employers**

The Supported Wages System (SWS) is a great way that people who would otherwise not be employed can gain meaningful employment in a manner that provides a fairly assessed wage and an affordable long-term option for employers.

But the operation and monitoring of the SWS could, in my opinion as a Supported Wage Assessor of 20 years standing, be improved as follows:

A good place to start would be to revisit the 2001/2002 SWS Evaluation Report in which many recommendations for change were made. Some have been implemented, others not.

Some of the following 6 recommendations are canvassed in that report:

Recommendation1:

**Get rid of the $80 SWS weekly minimum** wage with its irrelevant connection to the DSP income threshold (or make it pro-rata instead) as it can disadvantage those employees with disability with low productivity scores and working part-time even to the extent of causing job loss in my experience in the open labour market where some employers have not been able to increase hours nor been willing to pay more than the assessed rate of pay. It is also a burden to ADE employers using SWS as they usually end up subsidising part of low-productivity workers’ wages.

Recommendation 2:

**Review the “rounding for supervision” provisions**. There should be no rounding in ADEs, just a flat rate. In open employment environments, + or -5% rounding should be available to factor in any increased costs caused by the employers who need to provide above-average additional levels of supervision or direction. These employers do not operate with DMI levels and support funding to provide this additional supervision or direction. The current rounding within the decile routine is inequitable.

Recommendation 3:

**Review the “annual review” requirement**. Look at alternative and less intrusive review mechanisms for SWS employees who have scored the same SWS assessment outcome for three consecutive years and who have no changes in their job descriptions. Though perhaps an assessor still needs to be involved to check the bona fides of an employer’s request to bypass a normal review assessment in these circumstances and to assist with completion/tribunal lodgement of SWS wage agreement paperwork. This would be applicable in both ADEs and open labour market workplaces.

Recommendation 4:

**Revisit the adequacy of SWS training** provided by DSS. There is a need to return to more rigorous and expansive face-to-face training (including a practical exam and at least one on-site assessment involving mentoring by an experienced assessor) as the competence of some assessors is clearly not adequate. At a minimum any on-line training (perhaps this could be remodelled as refresher training once initial face-to-face training is completed) needs to be improved and made more comprehensive (e.g. the differences between SWS assessments in ADEs & open employment, a definition of “valid historical productivity data” including what should and should not be included in such data, and discussion of how it can be utilised in SWS assessments). There is currently no mention of SWS use in ADEs nor the applicability of historical productivity data in current SWS on-line training to my knowledge.

Recommendation 5:

**Revisit SWS quality assurance processes** as follows:

* Get rid of automatic assessor payments once an SWS report is submitted on-line
* Introduce desktop quality monitoring of every SWS report that it is submitted before any authorisations for assessor payment are made
* Train DSS “SWS Management Unit” staff in SWS report quality assurance ensuring they are equipped in how to recognise quality reports (i.e replicable assessments with clearly defined tasks with clear starting & finishing points, units of measurements, performance benchmarks, quality components, etc) and adequate assessments (i.e.enough time spent on-site taking timings to lead to a fair result and warrant a 5hr/$600 minimum payment)
* Implement better/stricter sanctions against incompetent assessors/NPA providers.

**Improving ADEs**

I believe there is a need to return to the vision for supported employment that was developed under the previous government: reverse integration into social firms or enterprises where divisions between staff and supported employees are no longer perpetuated, wages are fairly assessed and paid under a modified Supported Wage System, and the number of workers with disability employed reflect a reasonable community average/percentage.

This would increase productivity and contribute to long-term business viability.

Given the current demographics of ADE workforces, this would need to be timelined

Perhaps the quota of ADE workers transitioning to open employment needs to be upped in ADE contracts with DSS, and DES-like services set up within ADEs or stronger alliances encouraged or mandated with existing local DES providers.