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**Victorian Deaf Society (SensWide Employment)**

**Submission Paper**

**a response to the**

**National Disability Employment Framework – Issue Paper**

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6. **Primary Statement**

The Victorian Deaf Society (trading as SensWide Employment) has been delivering employment services for the Australian Government since the early 1990s. Through the many variants of the employment services models, SensWide Employment has supported over 1,600 Deaf and hard of hearing Victorians to lead fuller and more rewarding lives through active contributions to the labour market.

SensWide Employment supports the views that “The Australian Government is committed to encouraging and supporting the equal and active participation by people with disability in economic and social life.”

We agree that “Australia’s employment outcomes for people with disabilities are poor, despite low levels of unemployment and changes to Government employment programs over recent years” and that “The Australian Government is looking at ways to improve the employment outcomes for people with disability to enhance their social and economic participation.”

Australia only ranks 21 out of 29 in the Organisation for Economic Co-operation and Development (OECD) countries in employment rates for people with a disability. (PwC, 2011)

**To this end, the Victorian Deaf Society recommends the complete dissolution of the current DES model and the implementation of a new framework that follows NDIS principles, is market driven and encourages flexibility, innovation and competition to achieve better outcomes for job seekers and increased value for money for the Government.**

1. **About SensWide Employment**

SensWide Employment delivers 8x DES contracts across 6x sites in 4x ESAs of the Melbourne Labour Market Region. Initially operating as a specialist sensory loss consultancy service, SensWide Employment expanded into a range of mainstream employment services (including Job Network and Work for the Dole) and generalist contracts.

We are now an innovative, boutique DES provider that is demonstrated in our unique mix of contracts. As an example, we are the only holders of Lesbian, Gay, Bisexual, Transgender and Intersex (GLBTI) specialist DES contracts in Australia and operate one of the few Integrated Employment Programs (Waghorn’s Place and Train model).

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| **Contract cohort** | **DES-DMS** | **DES-ESS** |
| Deaf and hard of hearing | 4x |  |
| Sensory Loss (Deaf, hard of hearing, blind and low vision)  |  | 1x |
| Lesbian, Gay, Bisexual, Transgender and Intersex (GLBTI) |  | 2x |
| Generalist (including an unofficial mental health speciality) |  | 1x |

However in this paper, we will focus on the future needs of Deaf people (being culturally Deaf Auslan users) to be able to participate economically to the productivity of Australia. In particular, we will draw on the 23 years of experience supporting people living with a sensory loss to recommend changes that should be considered for better access to work in the post-2018 Disability Employment Services redesign.

1. **How the current DES system lets down Deaf job seekers**

Deaf people want to work. They want to lead fulfilling lives with the same rich experiences afforded to other members of society. Unfortunately there are still many barriers preventing a Deaf person from accessing fulfilling and rewarding careers.

Despite the work of Australia’s Deaf societies, DES hearing loss specialists, and Deaf peak bodies to actively reshape society’s misconceptions to Deafness, there is still a strong resistance from Employers to recruit and nurture the careers of Deaf job seekers.

Recent Governments should be acknowledged for attempting to address the inequalities faced by Deaf people with the introduction of JobAccess and the Employment Assistance Fund (EAF). However generous the schemes contained within EAF are, they only go so far in providing fair employment opportunities for Deaf Australians.

The reasons behind this ongoing discrimination towards Deaf people in work are complex, entrenched, and widely held across the broader community.

Deafness is an invisible disability yet impacts a fundamental basis of human need – communication. Deaf people use Auslan (Australian Sign Language), a unique, visual language that has no written form.

Fluent users of Auslan are a minority with recent data suggesting there are less than 30,000 culturally Deaf people in Australia (ABS 2011). This leaves the community somewhat voiceless to encourage change.

**Barriers to work for Deaf job seekers**

1. Providing a Deaf person with full access to a workplace is expensive. Employers are reticent to bear the costs of language provision. Small to Medium Enterprises (SME) are often the businesses most willing to provide opportunities for a Deaf person in their workplace, yet those least able to afford it.

The Employment Assistance Fund is a valuable service for Deaf people, but limited in its capacity. The $6,000 per annum cap on Auslan Interpreting fees is often inadequate in meeting the needs of many Deaf people leading to the Employer or the DES provider having to meet the costs (from their own pocket and out of goodwill).

* 1. For example, Auslan interpreting costs at Auslan Connections are $87.50 per hour with a two hour minimum. Taking into account that many bookings require two interpreters to be present concurrently, a 7-hour training day would amount to $1,225.

Most new staff require induction and training with new jobs (including OHS regulations) that can easily over-spending the $6,000 cap in just one week. The rest of the years costs would then be unfunded by Jobaccess. We currently have a $25,000 budget for extra interpreting costs, and this is not including the interpreting conducted by our Auslan fluent staff.

A recent SensWide Employment Deaf Participant was placed into a high-security role and needed intensive job training (Passport data entry). This was quoted at $7,200 ($1,200 over the EAF cap).

1. The Government is to be congratulated for its commitment to providing training solutions to job seekers lacking vocational skills. However a job seeker with profound hearing loss is mostly unable to access the vast majority of training courses provided by Registered Training Organisations (RTOs) due to the expensive interpreting costs.

Despite a legislative requirement for RTOs to provide access to language (Federal Disability Discrimination Act 1992) “denying or limiting access” to Deaf people is commonplace usually due to “lack of funding”. Deaf people are unable to learn new skills and gain qualifications in shortage areas, or the industry of their choice, and therefore can’t compete equally in an open employment marketplace.

The recent introduction of the DSP<35 Reassessments and the tightening of new DSP claims (requiring an individual to prove they *can’t* work first) will only increase the need for vocational training for Deaf people.

1. Deaf school students are at risk of long-term welfare dependency due to lack of exposure to real-life vocational skills. The current DES Eligible School Leaver guidelines are prohibitive for any students not entering or in their final year of schooling, thus leading to teenagers with disabilities not enjoying the same after-school work experiences of their schoolmates.

Deaf students are especially disadvantaged due to their language needs at work that remain unfunded, making them unattractive candidates to prospective Employers.

1. Experience tells us that Employers typically hold preconceived notions of a Deaf person’s abilities that can block their right to a fair-go. Deaf people can be judged prematurely in the recruitment process by the generally held belief in what they can’t do, and not their actual skillset. For example:
2. Many recruiters now use phone screening as a first line method of shortlisting candidates. It is a time and cost saving measure that is commonplace. As a Deaf person can’t use a regular telephone, it allows the recruiter to immediately screen out the Deaf person without the offer of adjustments. Offers of alternatives are met with excuses of privacy breaches.
3. Occupational Health and Safety concerns are used as reason not to employ Deaf people in high-risk roles, despite the job seeker being full qualified and experienced in the role. Ignorance and caution are common barriers for Deaf job seekers in industrial, construction and warehousing sectors.
4. There is unpreparedness by Employers to look at alternative methods of communication in the workplace. Modern technologies are providing effective new ways of Employers for Deaf people to communicate with hearing colleagues and customers, but these take time to purchase, install, test and train the workplace. It takes a leap of faith for an Employer to place trust in the Deaf job seeker and their future communication styles.
5. Many generalist DES providers would rather not have Deaf people commenced in their service leading to a lack to choice and quality services for Deaf job seekers. Anecdotal reports from the sector reinforce feedback that Auslan interpreters are rarely provided at DES contact meetings, relying on the use of the written instead. This is inadequate, disempowering and leads to a person remaining devoid of control of their service. A recent Transfer by Agreement of a Deaf Participant took 4 weeks and 10 phone calls to action as the other provider was stalling.

Only DES providers with specialist Deaf contracts truly provide the choice and control that the Deaf Participant needs access to. This means communication in the language of their choice (being fluent Auslan), plain-English writing, alternative methods of contact (e.g. Facetime), understanding of Deaf culture, and access to interpreters (even when not funded by EAF).

DES providers servicing Deaf people carry additional administration and operational costs to other DES providers. This is due to the add-on needs of Deaf people. These can include the ongoing yet unfunded activities of:

1. Organising interpreter bookings and/or provision of interpreting by qualified in-house staff
2. Research of workplace modifications and adaptive equipment, and the associated applications for funding, quotes, purchase, installation and training
3. Translation of Department literature into plain English formats
4. The need to attend in person every job interview and external stakeholder meeting for language facilitation and support
5. The need to conduct all job search activities on behalf of the Participant due to low English literacy
6. Lower than average caseloads per Employment Consultant to allow for the provision of the above listed services (25 compared with the usual 35-40).

As a specialist Deaf provider, our internal staff provide no-cost interpreting services (where possible) to make up any shortfalls. This takes staff off their primary role of job seeker support but is necessary to keep Deaf people in work. Only a Deaf specialist DES can, or would, provide this highly specialised support.

1. **Recommendations and considerations for a future Framework**

**Deaf people accessing work**

1. That the current $6,000p.a. limit on EAF (Auslan 1) is reviewed to provide greater access to those that need it. A possible solution is to create an EAF (Auslan 1) funding pool that Deaf workers can draw done from as required.
2. That the EAF (Auslan 1) eligibility be broadened to include access to vocational training courses comparable to mainstream job seekers.
3. That school students are able to access disability employment services during secondary school to engage in meaningful vocational up skilling and planning for future work. This is vitally important with the new DSP changes and Deaf youth no longer having easy access to welfare support.

Deaf students are generally less adept as their hearing counterparts with “The effects of Deafness on cognitive development being quite diverse and complex due to the multitudinous ways in which families, societies, and cultures, react to and interact with children who are born Deaf and hence do not spontaneously learn to talk and comprehend speech.” (Mayberry, 2002)

With this in mind, Deaf students need greater access to earlier support to achieve educational and vocational outcomes.

1. That Auslan is added to the Adult Migrant English Language Program (AMEP) as Deaf migrants and refugees are unable to hear or speak English meaning their ability to work is severely compromised. Without language, job seeking is severely comprised.
2. A system that better reflects the administration needs and costs of servicing Deaf Participants (i.e. workplace modifications and interpreter bookings) to ensure they receive the right balance of support to achieve an outcome, no matter which provider is supporting them.

**System modifications and redesign**

1. The current DES framework is systemically flawed (as demonstrated in this paper) and is not achieving the primary goals of supporting more people with disability into open employment. Therefore we support a total deconstruction of the current framework and a new system implemented that follows the market driven, person centred principles of the NDIS.
2. The new system needs to have greater flexibility at its core to meet the individual and unique needs to the Participants receiving the support. The funding saved on over-servicing Participants with greater capacity for self support could be channelled into those needing greater input to achieve an outcome.
3. The compliance activities being transferred from Centrelink to the DES provider need dedicated funding so attention is not diverted from the core activities of Participant and Employer job support.
4. The red tape burden is onerous and continues to increase. A new system must be simplified, easy to access, effortless to understand and straightforward to use, and created in such a way that abuse is difficult. The DES sector is at risk of losing many experienced and valued practitioners due to the ever increasing administrative workload.
5. Employers need to be able to use the system independently and with ease, if that is their wish. Navigating the current system is too complex for anyone other than an experienced DES professional.
6. The system demands on Employers needs to be considered and relaxed, as providing wage evidence, meeting weekly benchmarks and completing forms is a barrier to employing a person with disability. A message is also sent that the worker is different than other staff, and this is not assisting with dismantling stigma.
7. Participants need true choice and control in determining their job outcomes. A tension between the National Standards of Disability Standards and the DES Deed plays right at the heart of Human Rights and the individual. This is not motivating and leads to disengagement from a program.
8. Career development needs to be factored into a model to ensure people with disability have the opportunity to grow their careers, stay employed and enjoy their work. To achieve a more diverse and sustainable workforce, all people need to feel valued and be encouraged to develop professionally. Deaf people often need support to do this.
9. **Proposed Projects for Trialling and Testing**

SensWide Employment is recommending that the DES Taskforce consider trailing and testing these proposals to assist with building innovative approaches into the new framework. We see these proposals aligning with the NDIS with definite potential for crossovers, especially in the ILC tier.

All proposals are conceptual and can be developed into a fully developed business model as required.

**Proposal 1 – Deaf students in a school setting**

**We propose that SensWide Employment partners with a range of schools containing a Deaf unit to deliver a 12-month targeted vocational program delivered in Auslan.**

Most Deaf students are ill-prepared for a working life and upon commencement in a DES as an Eligible School Leaver are years behind their hearing counterparts. They need a support scaffold built into their life long before finishing school.

This project will focus on developing a better life-course pathway by engaging a group of middle secondary Deaf students with work, creating partnering opportunities with local Employers, mentoring the students with their work experiences, and providing encouragement to the family, school and friends.

The effectiveness of the program would be measured regularly from commencement to completion, and the impact on each individual assessed for cost effectiveness and improved outcomes for the Government.

*Expected results would include:*

* *enhanced job readiness at school completion*
* *proven work history in open employment*
* *a taste of the* rewards *of work*
* *despite an increased upfront cost (akin to early intervention) end costs will be reduced and bring value for money through system design*
* *and the establishment of a mindset that encourages and motivates these young adults to enter the workforce.*

**Proposal 2 – Deaf Brokerage and Advice Service**

**We propose that SensWide Employment develops and manages a Deaf Brokerage and Advice Service to provide services to sector stakeholders.**

As highlighted in the paper, generalist DES services are more often ill-equipped to adequately support Deaf people in a culturally appropriate manner. An understanding of Deaf culture generally comes with Auslan fluency as the two are inextricably intertwined. However this leaves Deaf people restricted to Deaf services only that might otherwise not be suitable.

A Deaf Brokerage and Advice Service could operate in a model similar to the EAF scheme. Deaf people could draw down from a pool of funding to purchase consultancy and advice services to support them at a non-Deaf employment services provider, a private recruitment or labour hire company, or directly with an Employer.

Purchased expertise could include the entire spectrum of accessible supports (from cultural awareness raising to workplace modifications), but brought in on an as needs basis. This could be a national model put to open tender to bring best value for money for Government.

Currently SensWide Employment operates a totally free Advice Line for anyone to call and receive advice on working with Deaf people. This is internally funded and provided as a resource to the Melbourne labour market yet is unsustainable into the future. The Deaf Brokerage and Advice Service would expand this small program into a hands-on, tailored and ongoing service.

*Expected results would include:*

* *improved outcomes though greater choice of provider*
* *reduction of overall costs for Government*
* *enhanced personal empowerment of the Deaf individual*
* *and improved education for the general society to work with Deaf people.*

**Proposal 3 – Career Advancement Program**

**We propose that SensWide Employment develops and trials a project supporting Deaf workers (not attached to a DES) to change careers whilst still in employment.**

Deaf people get trapped in jobs. As the DES guidelines prohibit the commencement of a person for career advancement support, Deaf workers are often relegated to the same job for many years with limited career progression and a lack of new opportunities. Unlike their hearing co-workers, many Deaf people do not have the written language skills (or access to translators and interpreters) to advocate for themselves in a recruitment process. Their only hope of receiving support means resigning from a position and obtaining welfare to become eligible for DES.

This is counter-intuitive to the goal of cost saving for the Government.

This program could be trialled in a geographical region or across an industry, with the success rate measured and priced to derive the cost benefit.

The Career Advancement Program could be funded on an as-needs basis depending on the level of support required by the individual. The Participant numbers could be potentially be relatively small for this program (mostly white collar workers) needing a minimal funding commitment for high return.

SensWide Employment was also a partner of Career Advancement Pilot run by Disability Employment Australia. The pilot was funded through the National Disability Employment Initiative (NDEI). The Career Advancement pilot aimed to assist people with disability who are currently working to advance their careers.

The results showed that “that 75% of participants had achieved an identifiable improvement in their employment position. While many of these were anticipatory (increased skills relevant to the future), when this ‘increased skills’ category was excluded, 54% of participants had achieved one or more immediate improvements in their work.”

*Expected results would include:*

* *improved worker satisfaction and greater likelihood that they stay connected to the labour market*
* *reduction of overall costs for Government with the avoidance of a DHS allowance*
* *enhanced personal empowerment and feelings of self-worth with the Deaf individual able to determine their own careers*
* *Increased equality and access for Deaf people in the workforce*

**Proposal 4 – Future Workforce initiative**

**We propose that SensWide Employment partners with a TAFE (potentially Melbourne Polytechnic due to pre-existing arrangements) to run a skills shortage certificate course in Auslan for Deaf people.** This could be linked to the future NDIS workforce needs with skilled professionals desperately needed in service provision. I.e. Certificates in Disability, Community Services or Personal Care.

As explained earlier, Deaf people have limited access to vocational training due to the high costs of interpreters (educational interpreting is not funded thought EAF). Therefore Government funded programs are inaccessible for them and they miss out of entering skills shortage areas.

The funding needed would be to provide interpreters and Deaf cultural support to the students. Upon completion, the new graduates would have the option to join a DES and obtain related work.

*Expected results would include:*

* *The skilling up of a group of Deaf people that could be tracked through their career progression*
* *The exposure of Deaf people to a new range of skills and potentially career pathways in disability*
* *A direct and measurable link between DES and the NDIS*
* *Increased equality and access for Deaf people in the workforce*