



# RCAA

Rehabilitation Counselling  
Association of Australasia

## **Submission in response to the National Disability Employment Framework – Issues Paper (Department of Social Services, May 2015).**

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Thank you for the opportunity to respond to the National Disability Employment Framework – Issues Paper.

RCAA is the professional association exclusively representing the interests of tertiary qualified Rehabilitation Counsellors (RCs). As a profession, rehabilitation counselling evolved from post-world war vocational rehabilitation for returned services personnel. Since that time, our major focus has become the provision of vocational and occupational habilitation/rehabilitation for people experiencing illness, injury and disability, including mental illness, such that these conditions affect people's capacity to obtain and maintain gainful employment.

Rehabilitation counselling practice includes interventions to assess and improve psychosocial, physical, emotional, non-vocational and vocational functioning of individuals who experience vocational disadvantage. RCs have provided professional services within personal injury management and vocational rehabilitation systems for many decades. Indeed, vocational assessment, planning and career counselling; job development and placement; and, workplace disability management, are among the core competencies and expertise of RCs (Matthews, et al., 2010; Matthews et al., 2015). Facilitating and supporting meaningful employment for people with injury and/or disability is our core business.

RCAA would like to offer some insights and suggestions in response to the requested topic areas of the Issues Paper. Some of these topics are more relevant than others to the work of Rehabilitation Counsellors in their person-centred practice with people with disability, hence the most relevant have been selected and responded to in the following pages.

## **Workforce Participation of People with Disability**

RCAA would like to thank the Australian Government for its acknowledgement of Australia's very poor workforce participation rate for people with disabilities (OECD, 2010) and applaud its recognition of the need to address the complex barriers faced by people with disability in relation to securing and maintaining employment.

It is now well established that employment is advantageous for a person's health and wellbeing (The Royal Australasian College of Physicians and The Australasian Faculty of Occupational and Environmental Medicine, 2011), and access to adequate, satisfying and meaningful employment has even stronger contributions to one's overall health and quality of life (Waddell and Burton, 2006; Butterworth et al., 2011).

There is much Australia could do to improve the employment situation of people with disabilities. With the advent of the NDIS, and an increasing government and community commitment to the social and economic engagement of people with disabilities, a major goal must be for people with disabilities to have improved access and pathways into meaningful employment and enhanced opportunities for community participation. Indeed, this will require investment in the provision and brokerage of services by fully qualified allied health professionals with documented knowledge and skills in vocational rehabilitation and career development, combined with marketing of clients and engaging and supporting employers. These services must be person-centred, indeed person-driven, and promote a change in culture to one where there is an expectation of employment capacity, contribution and opportunity.

Better utilisation of the skills of RCs would increase the likelihood of achieving improved workforce participation rates for people with disability, whilst at the same time reduce overall long term injury/health/disability costs to individuals and governments. Increased government recognition of the work of RCs, along with expansion of the RC workforce for individuals accessing Disability Employment Services (DES-DMS & DES-ESS) and services under the NDIS, will not only help to address the issues mentioned, but will aid in building capacity in readiness for needs associated with an ageing population with high rates of chronic illness and disability.

## **Different needs of People with Disability**

People with injury, chronic ill-health, disability or disadvantage generally have some degree of restriction or limitation within the spectrum of health. Consequently, any intervention required by an individual to improve or maximise his/her 'health' and vocational functioning, whether that be restoration of physical/psychological function or assistance to gain greater independence, requires intervention by a health and/or allied health professional. Ensuring access to allied health professionals with vocational rehabilitation expertise ensures an individual is assisted in the holistic

manner required to bring about the best entry to/return to work and quality of life outcomes desired by the individual, and indeed required by governing agencies.

The needs of people with disability in the context of employment are highly individual and dependent on the physical, psychological and social strengths and limitations of each individual. These needs must also be balanced with a strong knowledge and understanding of the requirements of the work role, industry and employer that the person will be engaged in, to ensure sustainable and meaningful employment participation is achieved.

A far more individualised, person-centred approach is needed to adequately respond to these needs and enable individuals to reach their employment potential. Indeed, an individualised, career development approach across the life-span is required, and this approach is fundamental to RC practice.

### **Principles for Changes to Disability Employment Services**

| <b>Principles</b>                                      | <b>Benefits</b>   |
|--|---|
| Individual funding based on needs and aspirations      | Choice and control to the individual  |
| Market-based service provision                         | Flexibility, innovation and responsiveness to individually based consumer choices   |
| Long-term career planning and capacity building        | Sustainable employment outcomes that meet current and future labour market needs    |
| Understanding of employer needs                        | Better match between job seeker and jobs, leading to better, longer term employment |
| Increased open employment options                      | Social and economic gains for the individual and broader community                  |
| Whole-of-government coordination and use of technology | Improved service pathways and reduced 'red tape' for clients and service providers  |
| The person is supported through the life-course        | An integrated approach that maximises lifetime wellbeing                            |

RCAA supports the principles put forward in the Issues Paper and looks forward to further information in the upcoming Discussion Paper on how these principles may be better operationalised through improved service provision, access and options for jobseekers with disability.

## **National Disability Insurance Scheme**

An important principle to be operationalised as part of the NDIS is self-determination. Individuals with disability will have greater choice and control over the services and supports relevant to them. Enhanced options and access to specialised job services should be key to opening employment opportunities for people with disability, on their own terms.

RCAA is awaiting information on how RCs may play a role in providing these services under the NDIS. It is evident that the core knowledge domains and competencies of RCs would offer valuable expertise in partnerships with people with disability, their families and communities, in enhancing workforce and social participation (through ways discussed throughout this submission paper).

## **Disability Employment Services (DES) and Job Services Australia (JSA)**

The major and recurring criticism of current services and systems is that DES and JSA are simply *processing* people with injury, disability and disadvantage, to achieve 'status quo' outcomes. Persons not qualified in allied health and vocational rehabilitation are less able to deal with the various interactions across the health spectrum faced by this group of individuals seeking or returning to employment. The placement in low/un-skilled jobs of individuals who are skilled, qualified or have specialised skills is largely an inappropriate vocational strategy. Whilst RCAA acknowledges that work is valuable, the focus must change from "any job" as an endpoint (which is driven by the remuneration to the provider), to less demanding/challenging work as a viable step towards more desirable work that is congruent with the person's skills, qualifications and potential. The absence of long term career plans (and support to achieve these) is what is missing from this picture.

The variable level of training and qualifications of staff working in vocational rehabilitation contexts in Australia has been noted and attributed to poor service and outcomes for people with disability (Buys, Matthews & Randall, 2014). A lack of qualified professionals in this context frequently results in fragmented service, unintended adverse consequences and/or the unwanted and unsustainable status quo outcomes. Unfortunately, once an inappropriate job placement ends (anecdotally usually not long after 26 weeks), all too often the job seeker is left with no clear employment path to follow, and limited 'self-help' skills to fall back on – so they often re-enter the employment service system with the only difference being yet another negative experience of work and services.

Given the now well acknowledged shortcomings of the 'work first' model of intervention (Davidson, 2011), this approach must change if the true nature of disadvantage and barriers to employment is to be fully addressed. Services can no longer rely on 'quick-

fix' approaches that prioritise exiting individuals from welfare payments, at the expense of meaningful and sustainable occupational attachment.

All job seekers must be afforded genuine individualised assessment and interventions that acknowledge their unique strengths, interests, skills and aspirations, whilst ensuring adequate support to self-determine their employment paths.

RCAA would also like to recommend the following innovative program additions in the JSA and DES contexts:

- Develop and make available for people with disability or disadvantage a comprehensive health literacy program. The aim would be to empower individuals through knowledge and enable them to better assess their own needs. Crucial to the success of such a program would be input from and delivery by qualified and experienced allied health professionals. RCAA would welcome the opportunity to lead such a program, which would be grounded in evidence.
- Provide resources and encourage suitable people with disability to become qualified professionals through engagement in tertiary study. Often the lived experience of disability and/or disadvantage is very relevant and valuable in a diverse range of professions. RCAA would welcome the opportunity to lead such a pilot program, aimed at providing opportunities for participants to build their career opportunities, earn decent salaries and enjoy increased health status and quality of life. RCs are well placed to encourage participants to consider and thoroughly evaluate occupations that require tertiary study, and if the DES system could provide more support for people to enter and complete their studies, this would greatly influence the desired outcomes – people more engaged in work, earning much better money, and with significant potential to contribute at a very high level. If DES providers could offer support to participants at key points while they are studying – e.g. assistance to source or support practicum placements; and for employment assistance to commence 6 months prior to graduation, this would lead to many more people with a disability entering and completing tertiary study, with much greater chances of having meaningful jobs to go to once they graduate.

### **Support for Employers**

Rightly recognised in the Issues Paper is the importance of engaging employers in the drive to increase workforce participation of people with disability. Unfortunately there is still much work to be done in educating employers of the tremendous opportunities and benefits of employing and retaining people with disability.

Most employer surveys appear to paint a picture of successfully accommodated workers in a supportive environment. However, there is much anecdotal evidence

revealing that employers provide a positive view specifically for diversity/disability surveys, but in reality continue to harbour negative stereotypic views of people with disability. These negative and misinformed views have also been indicated among co-workers and society generally. As a result people with disability continue to be placed in low paid jobs and face ongoing and widespread discrimination.

Broadly, education of the benefits (and the social responsibility) of employing people with disability needs to be significantly expanded and invested in. In individual cases, RCs routinely engage in respectful and informed conversations with employers, responding to their needs as much as the needs of the person with a disability. Through this engagement, RCs educate employers on all aspects of employing a person with disability, including the supports and resources available to them in making reasonable accommodations (if required) and ensuring a positive and sustainable job match. RCs recognise the duality between the person and the employer is critical to success. A person can be “ready” for work and all their needs have been met – but without an employer and role that matches, they won’t be any closer to meaningful and sustainable engagement in work.

RCs are also perfectly placed to support Job in Jeopardy (JIJ) workers, and workers with a disability who want to access career development services. The current DES model does not recognize a decrease in employment hours as an outcome for a JIJ worker – where for some people with new or deteriorating conditions, this is the only possibility for them to maintain their employment. RCs can assist the person to explore all options in relation to managing their condition at work, but if the person is simply unable to work at their previous hours, negotiating a reduction in their hours or workload at least ensures that the person continues to work at their employment potential. The disincentive through the star rating system, which penalises providers who assist a person who is unlikely to retain their pre-injury work hours (and therefore results in the person being unable to access assistance), needs to be removed.

Employer engagement and appropriate assessment of person-environment congruence, along with the application of other evidence-based practice to ensure appropriate matching of an employee with a workplace and employer, all need to be applied to the process of job development and placement for individuals with disability. RCs are expertly placed to apply this knowledge in practice, to ensure enhanced outcomes in job durability and career development for people with disability.

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