

9 July 2015

Disability Employment Taskforce
PO Box 7576
Canberra Business Centre ACT 2610

Submitted online via DSS Engage

National Disability Employment Framework

Introduction

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the peak, national body representing Australians from culturally and linguistically diverse (CALD) backgrounds. We work to promote fairness and responsiveness to our constituency in the delivery and design of government policies and programs. At the heart of FECCA's work is promoting multiculturalism, embodied in equitable policies and non-discriminatory practices for all Australians, regardless of their cultural, linguistic, ethnic, racial or religious backgrounds. Towards this end, FECCA strives to ensure that the needs and aspirations of various cohorts of Australia's culturally and linguistically diverse population are heard by policy and decisions makers, as well as the broader public. FECCA continues to work with organisations that advocate for people with disabilities from CALD backgrounds, including the National Ethnic Disability Alliance (NEDA).

According to the *Survey of Disability, Ageing and Carers*, 4.2 million or 18.5% of Australians live with disability.¹ Australians with disabilities earn significantly less than the average wage and are under-represented in the workforce. The average weekly income for a working age person with a disability is \$344, which is nearly half that of a person without a disability.²

¹ Australian Bureau of Statistics, *Survey of Disability, Ageing and Carers (2012)*.

² Senate Community Affairs References Committee, *Bridging our growing divide: Inequality in Australia* (December 2014), 117.

More than 1 million people with disabilities are from CALD backgrounds.³ In other words, CALD people constitute close to one fourth of the total number of people with disabilities living in Australia. These individuals are often subjected to two fold discrimination based on their disability as well as their CALD background. These intersecting disadvantages inhibit them from effectively and productively engaging in the Australian workforce.

Considering these factors, FECCA appreciates the Australian Government's initiative to implement the National Disability Employment Framework focusing on improving employment outcomes for people with disability.

Workforce participation of people with disability

Lack of specific data on workforce participation of people with disability from CALD backgrounds renders the understanding of the issues faced by this cohort more difficult. Given the substantial number of people from CALD backgrounds with disability in Australia, it is imperative that government employment strategies implement systemic data collection methods which capture the participation of CALD people with disability in current recruitment processes and contributions made to the Australian economy. Such data would be an invaluable resource to encourage employers to recruit more people with disability from CALD backgrounds.

A lack of available employment opportunities for CALD people with disability who have tertiary qualifications is a key barrier to entering the workforce. FECCA's community consultations have revealed that employers are hesitant to employ CALD people with disability due to lack of understanding of their capabilities and needs in the workplace. In certain instances, these issues are aggravated by difficulties in getting overseas qualifications recognised in Australia.

FECCA received feedback from community consultations that the Employment Services Assessment (ESAt)/Job Capacity Assessment (JCA) (utilised by Government employment services to determine the capacity of a person with a disability to work), in certain instances, is restrictive or not reflective of the actual working capacity of a person with a disability.⁴ The number of hours a person can work in a week may increase as that person learns and becomes familiar with their job role. Thus, reviewing these assessments more frequently to assess the capacity to work would benefit the person with a disability as well as the employer/employment service provider in the long run.

³ National Ethnic Disability Alliance, *Disability Employment Services (DES) Consumer Engagement Project* (June 2014), 4, accessed at: http://www.neda.org.au/images/reports/NEDA_DES_PROJECT_2014.pdf

⁴ See further about the assessments at: Conducting an Employment Services Assessment (ESAt)/Job Capacity Assessment (JCA), <http://www.humanservices.gov.au/spw/corporate/freedom-of-information/resources/disclosure-log/2013-01-10-guidelines-and-mandatory-requirements-for-jca.pdf>

Employment Services

Another key barrier is reluctance on the part of mainstream employment service providers to find middle management or management level job placements for people with disability. Through community consultations, FECCA has found that mainstream employment service providers tend to direct people with disability to disability specific employment providers, who often place people with disability in low skill and low paid jobs that do not reflect their level of education or skills.

Disability Employment Services (DES)

CALD people with disability face additional barriers in obtaining sustainable and meaningful employment. The feedback received by NEDA from service providers revealed that barriers for CALD people in accessing DES employment services included inadequate information on services provided by DES for CALD people and difficulties in reaching out to people with disabilities from CALD backgrounds who do not access or are not aware of DES programs and services. Despite these barriers, NEDA highlighted that “CALD people with disabilities who participated in DES services had better outcomes and reached their milestones at a greater rate than that of Anglo Participants”.⁵ FECCA recommends that the new employment framework pay special attention to increase engagement of people from this particular cohort.

JobAccess

JobAccess is an initiative of the Australian Government to support the employment of people with disability. It provides vital services such as information and assistance with regard to workplace modifications or adjustments and ongoing support to find and retain jobs. However, the information about this service is limited to English and there are no translated materials available on the website. The JobAccess website does not provide clear indications as to how translation or interpretation services can be accessed.

It is encouraging to see the website provide ample information for both people with disabilities and employers including information on working with people with disabilities, National Disability Recruitment Coordinator (NDRC), making complaints about disability employment services, and other issues. There is also information about using simple English and interpreter services when working with individuals who use English as a second language, which is commendable. However, apart from a number of *ad hoc* references to the importance of using simple English and interpreters, the website does not provide sufficient information about CALD specific services.

Online service and information provision is limited to those who have access to and are literate in using computers and the internet to find such information. This would preclude a number of individuals from accessing and obtaining these services, which would result in narrowing the paths to employment. FECCA highlights the importance of utilising other forms of communication, including ethnic media and direct engagement with ethnic communities.

⁵ *Ibid* p5.

Job Services Australia (JSA) and JobActive

The uncertainty around JobActive model and the transition from JSA to JobActive is another deterrent for those who seek employment. Under the JSA model, there were CALD-specific disability employment providers such as Access Community Services Limited, in Queensland. There is little clarity among CALD community members about this transition process and the new JobActive service providers.

The new JobActive website provides information with regard to JobAccess, DES and Disability Employment Fund. However, there is no clear reference to CALD-specific disability employment service providers. Similar to other websites such as JobAccess, there is no clear reference on accessing interpretation or translation services. CALD-specific service providers can have a better understanding of the specific barriers that individuals from a CALD background face and be more responsive to the needs of those clients, and as a result will be more successful in finding appropriate opportunities. Funding CALD-specific employment services and providing information about these services would be a positive step to enhancing the employment outcomes for people with disability from CALD backgrounds.

Support for employers

There are numerous misconceptions about the cost implications and efficiency of employees with a disability which may discourage employers from recruiting people with disability. Workplace diversity can be used to understand and connect with ethnic-specific market segments or expand the business beyond the traditional markets and customers. Employers and organisations will further benefit from developing and maintaining a positive public image through offering services to CALD people disabilities.

There are numerous financial incentives to recruit people with disability offered by the government, namely, the [Wage Subsidy Scheme](#), [Disabled Australian Apprenticeship Wage Support](#) and [Supported Wage System](#). However, research reveals that financial subsidies have little impact on an employer's decision to employ a person with a disability. Factors such as ability to perform the assigned tasks and low risk of absenteeism are more important determinants for employers rather than financial incentives.⁶ Therefore, FECCA believes that it is important to educate employers about the benefits of recruiting people with disabilities as the best path to increase labour force participation. It is also important to promote the benefits of cultural diversity in the workplace.

The National Disability Insurance Scheme (NDIS)

NDIS participant plans are tailor-made to suit the requirements of each individual. NDIS participants have the flexibility to study towards obtaining qualifications in the fields of

⁶ J Graffam, K Smith, A Shinkfield, U Polzin, 'Employer benefits and costs of employing a person with a disability', (2002) 17 *Journal of Vocational Rehabilitation* 251, p257.

interest at their own pace and lead more independent lives. CALD people with disability who are eligible participants of NDIS can focus on improving language and communications skills, and also learn and engage in cultural activities which are important aspects of a cohesive society. The NDIS, still in the trial stage, has already changed many lives in terms of providing individuals with opportunities to pursue careers of their choice.

For example, Briahna Grant-Griffin has a successful rag doll business in Canberra. As part of her NDIS package, Briahna was able to purchase a push-button sewing machine. The business makes her an active member in the community and is assisting her to become more independent.⁷

Eligibility for the NDIS is limited to those who hold Australian citizenship, permanent residency or hold a protected special category visa, excluding CALD people with disabilities who have a different visa status. In addition to this limitation, the NDIS will support 460,000 individuals, approximately 11% of the 4.2 million people with disability in Australia. Thus, it is vital for government agencies to identify and promote programs to assist people with disability who are not eligible to participate in the NDIS.

Improving employment outcomes for people with disability

Increasing employment options for people with disability is an avenue that can enhance workforce participation. Given the significant developments in information technology, working from home is an option that is cost effective and convenient for employers as well as employees. People with disabilities, especially those with mobility issues, can greatly benefit from being provided with the opportunity to work from home. This in turn will be beneficial for the employer with regard to the optimum utilisation of company resources.

Job sharing amongst people with disabilities is another practical solution. Employers recruiting several individuals to carry out the work of one full-time employee during specified days or times of the week will provide more job opportunities for people with disability who are capable of working a limited number of hours a week.

Special considerations in relation to CALD people

The policy behind the recent developments with regard to disability employment is to encourage people with disability to move from the Disability Support Pension (DSP) to employment.⁸ Given this policy, there may be an emphasis for employment service providers on finding job placements for people already receiving DSP. There is a 10 year qualifying

⁷See further: NDIS helps Briahna Grant-Griffin set up rag doll business with push-button sewing machine <http://www.canberratimes.com.au/act-news/canberra-life/ndis-helps-briahna-grantgriffin-set-up-rag-doll-business-with-pushbutton-sewing-machine-20150608-ghhzxi>

⁸ See further <https://www.dss.gov.au/about-the-department/publications-articles/corporate-publications/budget-and-additional-estimates-statements/2014-15-budget/budget-fact-sheet-working-age-payments>

period for permanent residents to be eligible for the DSP, which means a considerable proportion of permanent residents as well as temporary residents do not receive this payment. The emphasis on shifting those receiving DSP to employment may adversely affect CALD people with disability who are not eligible to receive DSP.

Employment services should consider contextual factors such as the cultural, language and religious backgrounds of jobseekers. Coming to contact with certain products, including animal products, working around alcohol or having to wear a uniform that cannot be altered to satisfy certain religious practices such as covering the head may go against certain religions or religious practices. The employment service providers should pay attention to these factors when placing people with disabilities from CALD backgrounds in employment.

It is imperative that education programs about employment of people with disability target family members and carers of people with disability. Family members, often parents, assume the role of caring for CALD people with disabilities. These carers may have misconceptions about employment of people with disability and allowing those individuals to be more independent as they believe that it is their responsibility to protect and provide for the children with disabilities.

The inability to obtain employment due to language barriers is another hindrance that people with disability from CALD backgrounds face. Thus, job placements with ongoing training and language assistance could assist to increase workforce participation of CALD people with disabilities. On-the-job training will not only enhance productivity but also result in capacity building of a person with disability.

It is also important for the employment framework to focus on and increase the number of CALD specific mentors and role models to encourage people from CALD backgrounds to be employed. Witnessing people from similar backgrounds excel in employment or receiving moral support from individuals they can relate to will be effective mediums of improving employment outcomes for people with disability from CALD backgrounds.

Recommendations

- Promote employment options such as 'working from home' and 'job sharing' to employers to increase the participation of people with disabilities in the workforce and to create more opportunities for these jobseekers.
- Ensure that people with disability are provided with employment opportunities in management and middle management level jobs without restricting them to low-paid and low-skilled jobs. This can be achieved by educating employers about the benefits of having a diverse workplace, and educating employment service providers about the varied capabilities of people with disabilities.
- Adopt measures to gather specific and accurate data as to the number of people with disability from CALD backgrounds, workforce participation and economic contribution.

- Implement targeted communication strategies for JobAccess and DES to reach ethnic communities, including utilising ethnic media and meeting directly with community members to discuss the services.
- Promote cultural competency for employment service providers, including a requirement to consider a client's cultural and religious background when finding employment opportunities.
- Implement programs for people with disability, their family members and carers to educate them about their rights in the workplace, complaints mechanisms, new developments in the employment sector including recruiting practices and employment flexibility.
- Encourage employers to provide more on-the-job learning opportunities where people with disability from CALD backgrounds can learn about working environments, confidently interact with others and enhance capacity building.
- Facilitate mentoring programs and provide one-on-one training or interaction with role models from similar backgrounds to encourage more people from CALD backgrounds to engage in the workforce.