

Response to the
National Disability Employment Framework Issues Paper
July 2015



About Karingal

Karingal is a not-for-profit organisation that started in Geelong, Victoria in 1952 by a group of Geelong parents who formed a play group for their children, each of whom had a disability. Collectively, these families shared aspirations for their children and recognised the lack of life opportunities available in the community at that time for persons with a disability. Determined for a brighter future for their children these parents founded Karingal.

Over its period of operation Karingal has developed its service suite to achieve its vision for **a fully inclusive community where people with a disability live the life they choose**. Today, Karingal delivers an extensive suite of services to people with a disability, mental illness, the frail aged and those experiencing other disadvantage to fulfil its mission **to enrich peoples' lives through support, advocacy, partnership and choice**.

Today, Karingal offers services in approximately 40 communities across Victoria including in the Barwon National Disability Insurance Scheme (NDIS) trial site as well as locations in South Australia and Queensland. Commitment to Karingal's vision and mission underpins the development and delivery of services undertaken by its 1600 staff and 150 volunteers. Karingal's Services include (but are not limited to):

- Disability Employment Services, jobactive and Work for the Dole Coordinator Services delivered by Karingal's Employment Services division MatchWorks;
- Australian Disability Enterprise Commercial which has diverse business services including catering, café, packaging and landcare which provide supported employment for approximately 120 people with a disability.
- Individual Support Services including personal care and community inclusion programs for people with a disability and mental illness;
- Group based community inclusion programs for people with a disability and/or mental illness;
- Housing Assistance, Supported Accommodation and Respite, for people with a disability or mental illness and their families/carers;
- Aged Care Home Care Packages ;
- Youth Services for young people with a disability or who are otherwise at risk/highly disadvantaged;
- Residential and community supports for people with Acquired Brain Injury and their family and carers
- Accredited and Pre-Accredited Training with specialist trainers in the delivery of training to disadvantaged learners including those with a disability.

Introduction

In Australia, persons with a disability fare poorly compared to others in the community on most indicators of social inclusion and particularly in relation education, employment, living arrangements and financial wellbeing. The fact that other countries, including many less economically advantaged as Australia, are achieving stronger social and economic inclusion of persons with a disability, demonstrates that we can do better, and continued efforts to improve outcomes are required.

In responding to the disability employment services issues paper it should be noted that the workforce participation of persons with a disability is impacted by a range of factors. To achieve deep rooted improvements to the economic and social participation of persons with a disability reform must go beyond employment services. Persons with a disability experience entrenched inequity across a range of areas which influence participation opportunities such as education and training, housing, health and infrastructure. A whole of Government partnership such as that which delivered the National Disability Insurance Scheme is required to systemically address factors which contribute to the disadvantage and exclusion of persons with a disability. Achieving systemic change will ensure greater improvements to social and economic inclusion of persons with a disability can be achieved, build social capital and thereby also reduce reliance on paid supports.

Karingal welcomes the opportunity to respond to the Disability Employment Services Issues paper. The issues discussed in the paper are however broad and lend themselves to imagine a variety of scenarios for the future of employment services. While allowing a broad range of feedback and ideas to be expressed on one hand it also limits the degree which feedback can be targeted to specific design considerations. Karingal looks forward to opportunities to provide further input into the design through robust consultations on reform proposals as they are developed.

The Benefits of Employing People with Disability

What can improve employment outcomes for people with disability?

Disability is the result of the interaction between persons living with impairments and barriers in the physical, attitudinal, communication and social environment. Limitations to social and economic participation of persons with a disability often reflects social barriers such as attitudes and structural barriers such as accessible infrastructure more strongly than the impact of impairment on the individual.

People with a disability are restrained from reaching their potential in Australia by a culture of low disability awareness and low expectations. In order to improve the participation of people with a disability, societal reform is required. Fears, myths and stereotypes underpinning community attitudes continue to present amongst the most significant barriers to economic and social inclusion. Disability awareness strategies aimed at reducing widespread attitudinal inhibitors and thereby increasing societal capacity to function as enablers is required.

Karingal believes that poor intent is not the main factor driving the persistent social exclusion experienced by persons with a disability across all life domains. Most community members are well intended and exclusion often results as a by-product of individuals not being, or not feeling 'adequately equipped' to appropriately interact with or respond to persons with a disability. In supporting persons with a disability engage in community Karingal witnesses' first-hand the lack of disability awareness in the community. Too often we witness the discomfort of people interacting with persons with a disability and see good intent driving behaviours which result in persons with a disability feeling patronised or excluded. To illustrate, when support workers are assisting persons with a disability to undertake daily life activities people will engage with them rather than the person with a disability. It is not uncommon for example, even when the person with a disability is leading the interaction, for a shop assistant to defer questions to the carer or a waiter to assume that the carer will order and pay the bill. No matter how well intended interactions are, when underpinned by stereotypes and lack of awareness they are often result negative experiences for the person with a disability. People talking loudly and very slowly to a person in a wheelchair, people making presumptions about assistance needs, people avoiding eye contact so as not to appear to be staring are examples of every day interactions that contribute to social exclusion.

Persons with a disability, their family and other significant supporters have often been 'conditioned' to restrict aspirations and their life expectations to those reflective of what other people think they can do. This often starts in a person's early years with diagnosis of disability contextualised by expected limitations they will experience in life. The capacity of family and significant others to maintain encouragement of persons with a disability to aspire is often tempered by a desire to protect them from exposure to negative experiences and failure. A pervasive positive change in disability awareness in the community would create an enabling social environment that would contribute to improved expectations and hence participation of persons with a disability in the economic and social life of the community.

Workplaces are social microcosms to which people bring their values, attitudes, fears and perceptions. Investment in broad community based disability awareness strategies will improve disability employment. Persons with a disability want to contribute to the workplace productivity and feel connected with and included by their co-workers. A person's capacity to do undertake task related job requirements is often secondary to the social dynamics, a sense of belonging and inclusiveness of the workplace in relation to employment retention.

Karingal considers an effective strategy to build disability awareness is to create opportunities for community members to have a lived experience of social inclusion. To this end Karingal established its BacLinks program ten years ago to contribute to a strengthening of social inclusion through partnerships and social connectedness of business, community sector and individual community members for social benefit. A key initiative under this program is Karingal's Workplace Big Day Out (see attachment) which is conducted twice yearly in the Barwon Region. Local businesses are set the challenge to release paid staff to volunteer in the community for a day. Corporate volunteers are teamed up with persons with a disability and participate in a range of community based activities with 300 – 500 community members participating in each event. According to feedback from workplace participants this initiative positively impacts on perceptions and attitudes about persons with a disability and has increased volunteer activity. Employers releasing their staff report that the experience translates to the workplace and improves social dynamics particularly in regard to respecting differences and workplace inclusion and management of diversity. This initiative has resulted in increased opportunities for both open and supported employment of persons with a disability being offered by employers following participation.

What can help reduce barriers for people with disability seeking employment?

Persons with disability want to be fully included in the economic and social life of the community. The reform process should reduce real and perceived barriers for persons with a disability seeking employment including:

Removing Barriers to Access to Employment Assistance

A number of strategies have been implemented to encourage persons with a disability to participate to the extent that they are able in the workforce. However when persons on a disability support pension volunteers to participate they are generally required to agree to undertake a work capacity assessment to gain access to disability employment services. While it is acknowledged that income support entitlement reviews occur on a regular basis, it must be recognised that linking access to employment assistance to a review process the potential risk to income support deters people from participating.

Greater confidence in the social security safety net

A significant emphasis of workforce participation strategies has been directed at the person with a disability, encouraging them to seek pathways from welfare to work and financial independence. The system for determining access to disability related income support is predicated on demonstration of limitation/incapacity which can have a lasting negative impact on the person attitude to workforce participation. The OECD cross country study Transforming Disability into Ability - Policies to Promote Work and Income Security for Disabled People states "Societies need to change the way they think about disability and those affected by it. The term "disabled" should no longer be equated with "unable to work".

The OECD also noted the benefit trap created when recipients face a cumbersome award procedure to access income support noting 'stricter access to disability benefits results in somewhat higher unemployment levels'. The more difficult it is to access supports in the first instance the more reluctant a person is likely to risk losing them, once qualifying. The perception of risk transcends the person with a disability and influences attitudes of family and carers regarding testing opportunities in the labour market.

While recognising the social policy complexities, mechanisms that engender greater confidence and minimise perceived risks regarding access to the social security safety net would enhance welfare to work initiatives. Strategies such as the Passport to Work suggested in the Report of the Reference Group on Welfare Reform to the Minister for Social Services - A New System for Better Employment and Social Outcomes (2015) that provide a streamlined requalification for disability support pension for a reasonable period are likely to improve voluntary activation of persons with a disability. Improved voluntary participation in employment assistance is the first step to achieve stronger outflows from benefits.

Demonstrate Being Better off in work

In addition to the concerns about re-qualifying for income support, persons with a disability also consider the financial consequences of moving from welfare to work. Karingal acknowledges changes made to the income support system to incentivise movements from welfare to work such as more generous taper rates which enable people to earn more before their income support is reduced. However, as indicated in the Welfare Reform report it is often difficult for a person to calculate how they will be financially positioned, if they found work. Many persons with a disability also face greater cost of participation than others in the community given structural barriers encountered such as non-accessible public transport.

Ensuring that persons with a disability are; and can easily identify how they will financially be better off in work will increase their confidence to test the labour market. When examining whether a person is better off in work, loss of concessions is a factor and for people with a disability health care is a major concern. Persons with a disability can be motivated to restrict their level of participation in order to maintain concessions such as health care card entitlement. This motivation is compounded by the fact that the period of time an individual is on income support is currently not an approved exemption for the Life Time Health Cover Loading. Private health insurance is generally unaffordable on income support with basic cover equating to approximately 15% of the Disability Support Pension for a single person and a greater proportion of Newstart. The prospect of the cost of private health insurance with a loading or the additional Medicare levy as well as the cost of medications is a major consideration in assessing the financial benefits of work.

- Ensure persons with a disability can easily identify how their income support including concessions will be impacted by employment
 - Provide extended eligibility for concessions to engender confidence and transition to employment without a loss to standards of living
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How can we promote the benefits of employing people with disability?

Karingal notes that employers particularly those of small and medium enterprises are responsiveness to presentation of the business case for employing persons with a disability. Karingal considers that promotion of the benefits of employing persons with a disability can be achieved through a comprehensive campaign focused on the business case.

As stated in the Report of the Reference Group on Welfare Reform to the Minister for Social Services - A New System for Better Employment and Social Outcomes 2015 “negative employer attitudes to employing people who are disadvantaged in the labour market—including people with disability, people with mental health conditions, young people, mature aged, long term unemployed and carers—are one of the primary barriers to entering or re-entering the workforce, including access to work experience”. As discussed earlier employers should be seen as one target segment of a broad based disability awareness campaign. Karingal regularly encounters employers who while recognising the benefits, cautiously express concern about their capacity to manage potential reactions of customers and/or co-workers. These experiences reinforce the need to have a societal model underpinning reform of disability employment services. Rather than position a business as an employer of choice, in an ideal future people should expect to be working alongside persons with a disability and other people of diversity and question when this is not the case.

Karingal notes that employers frequently report that they have not employed a person with a disability, including many targeted for engaged in response to recommendations by existing employees with a disability. There is a continued and understandable reluctance of persons with a disability to disclose disability in the workplace. Developing greater disability awareness across the community will foster an environment in which disclosure is not perceived as a risk to workplace inclusion or employment retention and will have a positive impact on acceptance and use of ongoing supports.

Promotion of the benefits of employing persons with a disability must reflect the diversity of the population. There has been an emphasis on the need for better understanding of employers’ and improved preparation of candidates for roles. While not disputing the benefits of such improvements it must be noted that for a significant proportion of persons with a disability, this approach will not be sufficient to assist them to gain or maintain employment. The likelihood of employment is influenced by the type, nature of condition and severity of impact of disability. Promotion of the benefits of employing persons with a disability should encourage employers to genuinely think outside the box and more broadly consider potential roles, job customisation and workplace flexibilities to enable greater opportunities for employment inclusion.

What can help reduce barriers for employers hiring people with disability?

De-mystifying good workforce practices that enable employment of persons with a disability would assist greatly in improving workforce participation opportunities. Employers’ while generally responsive to the business case for employing persons with a disability employers often perceive that the workforce management practices required are complex, costly (in time and productivity) and are fraught with risks. As such effective promotion strategies need to be accompanied by initiatives which build the capacity and confidence of employers to manage a diverse workforce.

A key message about employing a diverse workforce is it is not necessary to overcomplicate business arrangements. Most good workforce management practices that support engagement and retention of employment of persons with a disability are good practices for all employees. Similarly recruitment processes which do not support diversity restrict access to talent more broadly. Arrangements that provide a safe and productive workplace for a person with a disability are not dissimilar to those needed by other employees. To illustrate an employer implemented improved lighting to support an employee with vision impairment in a warehousing role. The additional lighting designed for the individual significantly reduced picking and packing errors across the workforce providing a much greater return on investment than was expected.

In order to maximise employment participation it necessary to consider the diversity of opportunities required to meet the circumstances of persons with a disability. Efforts to promote disability employment have arguably focused on those with fewer limitations and who require minor workplace adjustments or modifications to meet roles on offer. Strategies to reduce barriers to employment of persons with a disability should include building employer capacity to make more substantial accommodations and workplace adjustments for those with more severe impact from disability that are rarely able to meet the requirements of an advertised vacancy.

Promoting the business case to employers as to the benefits of customisation of jobs is core to achieving significant improvement to workforce participation for those persons with a disability most distant from the labour market. Karingal has found that small and medium employers are responsive to the business case regarding the potential to achieve greater productivity of existing workers by carving out elements of their position to create a new role. Performance on those tasks carved out to customise a role to suit the skills and attributes of a specific person with a disability is also generally improved. For example an employer with an upholstery business employed a person with a disability to assist qualified upholsters

prepare furniture for refurbishment. The employees particular regard for detail enabled him to excel in the role and by removing small hazards such as staples often overlooked by other workers contributed to improved work health and safety

Better practice in the customisation of jobs includes design and development of workplace supports tailored to meet employers' needs and overcome concerns. For example, Karingal has worked with employers to create job task and work flow pictorial boards to support recruits with an intellectual disability and respond to employers concerns about excessive supervision requirements. Concerns regarding reliability can often be alleviated through exploring strategies to minimise unplanned absences such as flexibility of work hours and additional purchased leave to meet workers needs for periods of rest. Disclosure of disability is essential to customisation of job roles and negotiation of flexibilities. As such greater disability awareness would assist to engage more employers in solutions to workforce needs which include workforce diversity strategies as has been the case in promoting employment of parents through provision of school based hours, job sharing etc. over the past decade.

Principles of Reform

Karingal welcomes reform of services to people with a disability which is focused on improving outcomes and contributing to a more inclusive society in which they can meaningfully and equitably participate in the social and economic life of the community. Karingal supports the application of principles to ensure the reform process is carefully considered and minimises the risk of unintended consequences which have potential to diminish the likelihood of achieving objectives.

Karingal fully supports the principles outlined in the Disability Employment issues paper and the benefits they are intend to deliver. Karingal believes that the way in which these principles are defined, interpreted and applied will be critical to creating a disability employment service that has potential to achieve significant improvements to workforce participation for persons with a disability.

Principles	Benefits
Individual funding based on needs and aspirations	Choice and control to the individual
<p>Karingal welcomes a disability employment service that provides funding which meets the individual's needs and aspirations. In order to achieve individualised funding that genuinely meets an individual's needs disability employment services must include a comprehensive face to face person centred and directed assessment and planning process. The use of tools such as the Job Seeker Classification Instrument or application of funding bands will not deliver genuine individualised funding or well-planned supports.</p> <p>The Assessment Model should:</p> <ul style="list-style-type: none"> ▪ Be holistic and responsive to the person with disabilities individual circumstance ▪ Contain adequate supports to ensure choice and control by the individual is facilitated by access to information about the range of supports and potential pathways to employment available to them. ▪ Support persons with limited work experience and career direction to explore aspirations to ensure planning is designed to facilitate engagement in the labour market in the context of longer term employment and career goals. ▪ Value employment participation of all persons with a disability and optimise employment opportunity based on individual choice and provision of the required supports free of limitation arising from factors such as assessed work capacity. ▪ Value the role and welcome the participation and input of advocates to support the person with a disability at their request such as carers, family, significant others and service providers. <p>Individualised Funding should:</p> <ul style="list-style-type: none"> ▪ Reflect the persons individual circumstance, employability and vocational skills needs, and non-vocational barriers to be addressed for the person to achieve their aspirations in the context of influencing factors such as local labour market conditions ▪ Support access to and cohesion of supports through funded and client driven service coordination to ensure strategies are joined up and deliver a quality and effective employment pathway. ▪ Constructed in a manner which enables responsiveness to the individual within the funding envelope rather than be restricted by over prescription of funding designated to specific supports. ▪ Recognise the pathway to employment is a learning experience and provide flexibility to ensure that services remain responsive and avoid cumbersome approvals processes where the person wishes to initiate a change in strategy or direction. ▪ Maintain an individual focus regardless of income support eligibility and inclusive of voluntary and compulsory participation requirements ▪ Remain appropriate to circumstance through inclusion of streamlined access to plan and funding review. ▪ Support a skilled workforce and quality service provision through the rate of fees provided for services. <p>Karingal recommends that the assessment and planning process should be conducted by providers with expertise in employment planning.</p>	

Principles	Benefits
Market-based service provision	Flexibility, innovation & responsiveness to individually based consumer choices
<p>Achievement of flexibility, innovation and responsiveness to individually based consumer choices requires the framework for disability employment services to be streamlined and unburdened by prescription. Measures to manage the market, regardless of its construct, should not impinge on the choice and self-determination of the individual. Market based service provision should:</p> <ul style="list-style-type: none"> ▪ Be founded on evidence based market design approaches to build on current strengths and address weaknesses with models tested prior to implementation of reform ▪ Include market design and procurement strategies that support consumer choice while also mitigating risks of market failure, achievement of objectives and quality of services such as may arise from fragmenting service delivery or free market strategies. ▪ Include the Disability Service Standards and other market management mechanisms to ensure quality of service ▪ Offer sufficient financial assurance to providers to enable investment in infrastructure and expertise to deliver effective quality services ▪ Ensure access to and quality of specialist disability employment services across all communities including those which may be deemed unattractive markets. ▪ Contain administrative arrangements that are streamlined and free of unnecessary prescription to enable flexible, innovative and individual responsiveness ▪ Include a performance management system developed in consultation with intended service users, their advocates and providers which are aligned to the principles underpinning, and the actual design of the reformed market. For example, it will be challenging to achieve an outcome focused framework in a market in which no provider has primary responsibility for supporting the person on their employment pathway 	
Long-term career planning and capacity building	Sustainable employment outcomes that meet current and future labour market needs
<p>Karingal welcomes a long term approach to improving the workforce participation and career development of persons with a disability. Ensuring that persons with a disability have access to career planning and capacity building will influence the potential quality of employment opportunities available and potential for longer term self-reliance and employment satisfaction. The provision of long term career planning and capacity building should:</p> <ul style="list-style-type: none"> ▪ Align to the principles of choice and control with a focus on individuals' aspirations and goals; ▪ Be supported by other social policy initiatives that seek to address inequity such as those experienced by persons with a disability and other disadvantaged learners in the education and training system, ▪ Have an early intervention focus with particular emphasis on preparing and supporting young people to make school to work transition, ▪ Include experiential career exploration which provides an opportunity for the person with a disability to have experience of different roles and workplace environments on which to develop meaningful and well defined vocational goals (not just a job), ▪ Be supported by access to funding to broker capacity development strategies and the supports required by the person to undertake them such as interpreters, tutors and mentors, ▪ Encourage the shortest pathway to employment consistent with long term career goals to build experience, skills and work capacity while maintaining intensive assistance to support the person to achieve career progression towards their aspiration for as long as is needed or wanted. ▪ Be accompanied by resources and incentives that enable and encourage greater employer engagement in the development and advancement of employees with a disability 	
Understanding of employer needs	Better match between job seeker and jobs, leading to better, longer term employment
<p>Karingal recognises the criticality of employer engagement in influencing improvements to workforce participation of persons with a disability. There is no doubt that the better a job seeker and jobs are matched the greater the likelihood of sustained employment. The challenge of addressing the growing divide between the skills of persons who are disengaged from the labour market and employers needs particularly as a result of technology advances and the diminishing availability of low skilled jobs is complex.</p> <p>In exploring the principle of understanding employer needs it is worth noting the findings of the Disability Employment Services 2010 – 2013 Evaluation which stated; “Employers who were sent job applicants generally agreed that DES providers understood their business needs (85%) and accurately described the skills and abilities of the applicants (83%). Most were positive about the skills and personal attributes of the people referred.... Employers rated applicants lower on relevant work experience than other applicant attributes which is perhaps not surprising given the high percentage who enter the programme with no recent work experience”</p> <p>The reform of disability employment services should acknowledge the role of disability employment services as partners with employers to achieve customisation of roles. The ability to engage with employers to assist them to carve out a role to suit an individual job seeker is essential to assist persons with limited to capacity to prepare for existing conventional roles to achieve employment. As stated in the Evaluation of Disability Employment Services 2010 – 2013 “Job customisation requires a much deeper level of interaction between disability employment initiatives and employers. This is employer engagement at a local, often personal level.”</p> <p>If the principle of understanding of employers needs is applied with a narrow focus on providers improving the preparation of people to fill existing roles the design of a reformed disability employment service framework will have a limited impact on workforce participation.</p>	

Principles	Benefits
<p>A greater understanding of employer needs should be reflected and imbedded in the design of the disability employment framework. It is critical that administrative and or contractual framework of the reformed disability employment services enables responsiveness to employers needs and contemporary workplace practices. A reformed disability employment service must include a role and adequate resources to engage with employers on behalf of individual job seekers as well as to offer general diversity recruitment solutions and candidates prepared for roles through pre-employment assistance. This should not reduce opportunities and choice for persons with a disability to seek to interact directly with employers rather than through intermediaries such as providers of disability employment services.</p> <p>Disability employment service providers often assist employers to navigate the system to identify and undertake the various administrative requirements to access supports. Where employers do not have such assistance the perceived value of the resources and incentives is diminished. The framework should recognise employers need for streamlined access to the resources and incentives available to assist them to employ more persons with a disability and the role of disability employment services as enablers and navigators of the broader framework including other related program initiatives such as Australian Apprenticeships</p>	
Increased open employment options	Social and economic gains for the individual and broader community
<p>Karingal supports the principle of increasing open employment options for persons with a disability. Investment in economic development strategies to enable more opportunities and options should be undertaken and include support the social enterprise sector and Australian Disability Enterprises. Social enterprises and Australian Disability Enterprises provide experiential capacity development across hard and soft skills that can have a major impact on employability. While Australian Disability Enterprises are focused on supported employment their potential to assist persons with a disability to prepare for and transition to open employment should not be undervalued and is critical to meeting the diverse needs of persons with a disability within the broader disability employment services framework.</p>	
Whole-of-government coordination and use of technology	Improved service pathways and reduced 'red tape' for clients and service providers
<p>Whole of Government coordination and policy development to improve service pathways and reduce red tape to improve disability employment outcomes is welcomed. The reform of Australian disability employment services should be informed by initiatives implemented by the States and offer strong complementarity servicing provisions to ensure an individually tailored response to individual needs and goals.</p> <p>Technology can provide valued efficiencies for all stakeholders. The provision of greater choice in service options including use of technology should be an additional feature of the framework but should not replace or reduce access to traditional face to face contact where this is the preferred choice of the individual. To enable the benefits of increased use of technology:</p> <ul style="list-style-type: none"> ▪ Digital literacy programs should accompany the expansion of the role of technology in the service framework ▪ Initiatives to assist persons with a disability have greater access to technology should be implemented. 	
The person is supported through the life-course	An integrated approach that maximises lifetime wellbeing
<p>An employment services framework which provides life-course support to deliver integrated approach that maximises lifetime wellbeing is welcomed. The framework should be flexible and provide ongoing support as long as is required. Independence should be supported where desired by individuals with options to easily reengage and access supports as needs arise or aspiration changes.</p>	

Karingal considers that the principles of design should be considered interactively. For example, the principles of individualised assistance based on need and longer term career planning indicate a model without limits to the duration of service provision and reduced emphasis on speed to placement in favour of quality of placement. Similarly, benefits of choice and control to the individual and flexible, innovative and responsiveness to individually based consumer choices indicates a framework in which the nature and quality of employment outcomes are defined by the individual rather than imposed through contractual arrangements. The provision of individualised funding through open market based services as implemented for the National Disability Insurance Scheme would transfers the role of purchaser to the consumer and their satisfaction with support provided to achieve their goals becomes the primary indicator of performance. To achieve a cohesive and effective framework which delivers on expectations raised by the principles they must be considered and applied consistently across the design of reformed disability employment services.

Karingal recommends the adoption of addition principles to support development an effective disability employment service framework moving forward:

Evidence Based Design	Ensure job seekers and employers have access to a best practice model of disability employment assistance
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Evidence based design should be adopted to achieve strategically target service improvements to address barriers to workforce participation experienced by persons with a disability. An evidence based approach to identifying the strengths and weaknesses of current framework is imperative to a sound reform process. Ensuring that reform is discerning and takes forward those elements which are delivering desired objectives while removing/amending ineffective or inhibiting elements will provide a basis for progress on workforce participation objectives.

Disability Employment Services currently exist in a complex environment and identified structural barriers to achieving outcomes created by market management mechanisms such as contractual arrangements, service parameters and performance management must be considered. While the level of workforce participation outcomes desired has not yet

been achieved, reforms implemented iteratively over the past decade have delivered improvements to activation and employment outcomes. This evidence based reform process should include examining the lessons learned to identify effective and ineffective strategies including the impacts of transition on engagement and employment retention to inform how the reformed is introduced.

Greater access to data should be available to support research and evaluation that can contribute to the continuous improvement and innovation in disability employment assistance. Research to identify effective strategies to meet the diverse needs of persons with a disability should be encouraged on an ongoing basis and inform design and development of the future framework. A priority should be given to identify best practices to support persons with a disability with lower function and complex needs.

Needs based eligibility & demand driven access	Job seekers with a disability continue to have timely access to specialist Disability Employment Assistance as needed
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One of the most significant areas of reform has been to uncap Disability Employment Services enabling more persons with a disability requiring specialist employment assistance to receive assistance. The uncapping of DES resulted in significant gains to engagement of target participants (Evaluation of Disability Employment Services 2010-2013 Final Report) The new framework should continue to support and provide a suitable framework for persons with a disability based on objectively assessed need for specialist assistance regardless of income support eligibility, voluntary or mandatory participation requirements. Disability Employment Services should remain demand driven to ensure those persons with a disability requiring specialist assistance continue to have timely and ongoing access to supports

Current Services Overview

The current service framework contains a raft of supports which however are in silos with access wrapped in eligibility and service complementarity rules. This results in less than optimal capacity to join together supports to achieve an integrated and genuinely individual response. While acknowledging Governments responsibility to ensure appropriate management and program administration this situation can result in inefficiencies and diminish potential return on investment through outcome achievement.

As noted in the Report of the Reference Group on Welfare Reform to the Minister for Social Services, A New System for Better Employment and Social Outcomes (2015) *“Often individuals are required to reapply for a different income support payment as their circumstances change, due to the boundaries between payments”*. In the current disability employment service framework changes in income support often also results in disruption to employment assistance and movement between employment assistance programs. This includes system generated exits and movement rather than planned supported transitions between programs. Some job seekers experience multiple movements back and forth between programs and each time have to recommence in the program undertaking all the administrative requirements including renegotiating their job plan. This disruption is inefficient and diminishes the service experience for persons with a disability.

The assessment of work capacity in the absence of a real employment opportunity often lacks accuracy and similarly projecting future work capacity based on assumption about access to necessary supports is fraught with issues. As such using the work capacity assessment to set a benchmark working hours to achieve outcomes creates drivers which may not be consistent with the individual and their fit with a specific job.

Greater complementarity of services would enhance the framework by improving pathways and enabling joined up strategies allowing access to various aspects of programs to meet individual needs to achieve development of capability and outcomes. Greater opportunity for client centred collaboration amongst service providers through improved complementarity will engender innovation and better practice. For example complementary service provision with Australian Disability Enterprises could provide a participant of Disability Employment Service to experience a work environment, test and build their work capacity. Stronger relationships between providers may also result in improved strategies and collaborations to support a higher incidence of transition from supported to open employment.

The performance framework is a significant driver of employment service assistance in the current model. The unintended consequences of performance measures should be considered in the reform of disability employment services. Amongst these unintended consequence is the reluctance of providers to trial innovations in service delivery given the unforgiving nature of the performance framework. Ensuring the effectiveness and quality of service provision in the reformed framework should be consistent with the principles of individualised service provision, long term career planning and capacity building focus on the distance travelled to recognise progress and goal attainment on the pathway to as well as achievement of employment. Within this distance travelled model social outcomes should be recognised as a contributor to and indicator of improved employability skills.

In conjunction with the performance framework is the complex contracting environment which prescribes service provision requirements and also defines employment outcomes. Changes to the contracting arrangements and service provision requirements have often been implemented as a means to manage market behaviours. The result of this a narrowing of what is recognised as suitable employment for persons with a disability and increasing tension with the needs and preferences of the individual. To illustrate a range of rules have been introduced to ensure that employment outcomes are only paid for genuine open employment. The measures intended to curb some practices has impacted on open work places potentially being defined as enclaves because an employer has been too successful in creating opportunity for persons with a disability in their workforce. While the intent may have been sound the application none the less has resulted in barriers to real and sustainable jobs in open employment.

The provision of ongoing support plays a significant role in the employment retention of persons with a disability. Ongoing support is most effective when it is client centred and driven. While it is highly beneficial to include employers in ongoing support rights to non-disclosure must be respected. It is arguable that efforts to improve ongoing support through its inclusion in the performance framework and the rules defining instances of support appear to have weakened the traditional model. It should be noted that ongoing support needs are initially assessed in the abstract and are only really known when a person moves into employment. Assisting person with a disability to a position of independence in employment should be viewed as a success. The prospect of life course supports moving forward better recognises that an individual may test their independence a number of times before achieving it and will allow them access to supports as they require.

DES and NDIS

Karingal was a strong advocate for the implementation of a national disability insurance scheme and is one of the largest providers participating in the trial. Karingal believes that the NDIS has great potential to have significant impact on the social inclusion of persons with a disability, who are eligible to receive assistance. We recognise that these benefits will be shared by their families and carers who can also experience social disconnection as a result of disability on those close to them. With the reasonable and necessary supports provided by the NDIS persons with a disability and their families and carers will have greater opportunities to participate more fully in the economic and social life of the community.

NDIS alone however will not achieve the objectives for improvement to the workforce participation of persons with a disability. It is estimated that only 20% of current disability employment service participants will be eligible for NDIS. Furthermore currently NDIS participants who are eligible for disability employment services or jobactive will not receive employment support in their package. Ideally reformed disability employment services and NDIS should be complementary services. A complementary approach would ensure a person with a disability can utilise the range of supports they are entitled in a cohesive manner to achieve their goals.

Australian Disability Enterprises

Australian Disability Enterprises play an important and valuable role in the social and economic inclusion of persons with a disability. The opportunity to participate in employment provides many benefits to individuals which go beyond income. Persons with a disability regardless of constructs such as work capacity, have a right to employment participation. Persons with a disability are encouraged to seek employment and participate to the extent that they are able. While in an ideal future persons with a disability will more readily find employment opportunities in the open labour market, the issues outlined in this discussion paper serve to remind us of the improvements that are still to be achieved in the workforce participation of people with a disability.

Australian Disability Enterprises provide employment opportunities for persons with a disability who are amongst the most marginalised in the labour market and for whom open employment opportunities are least accessible. Paradoxically a measure of both success and weakness is Australian Disability Enterprises capacity to retain employees. Australian Disability Enterprises offer security of employment and high level support to employees. Supported employees are provided with training and development to build capacity and are encouraged to consider open employment.

Arrangements which require persons with a disability to take a risk and leave or least reduces hours of supported employment to seek alternative work are counterproductive to improving open employment participation. Where a person is working their benchmark hours in supported employment and feel they are able to also participate in employment assistance to find open employment, they should be encouraged to do so. Assurance of a supported employment place if open employment is not sustained should also be offered.

Australian Disability Enterprises direct knowledge of supported employees strengths and weaknesses position them well to broker customised roles in open employment. Consultation with the Barwon Australian Disability Enterprise Network indicated that most representatives considered that if they were appropriately funded to undertake employment assistance

directly that they could improve the transition of their supported employees to open employment. In this discussion a number cited the need to engage with another service for assistance created a barrier for some employees. The relationship built during supported employment including with families and carers, also provides a sound basis for ongoing support in the open labour market. Members of the network reported that a common factor contributing to unsustainable transition to open employment was a lack of connection and sense of inclusion with work colleagues. Improving representation of persons with a disability in open employment generally will provide a platform to increase the transition of supported employees.

Funding of Australian Disability Enterprises is provided to support workers with enterprises needing to be viable to cover infrastructure and operating costs. Achieving viability of Australian Disability Enterprises is inherently challenging given the labour models and productivity issues involved. This being said, promotion of Australian Disability Enterprises and potential business solutions they offer could assist them to develop greater business partnerships. The efforts of the NSW State Government to promote and facilitate procurement from Australian Disability Enterprises have resulted in significant increases to supported employment opportunities and the viability of enterprises. Similar measures recently introduced by the Victorian Government are also welcomed. An adoption of social procurement policies across all Governments (Commonwealth, State, Territories and Local) would offer significant opportunities for the viability of Australian Disability Enterprises.

Developing viable enterprises of any nature requires business ideas and capital investment. Small providers within the Barwon Australian Disability Enterprise reported that access to seed funding would assist to develop new business streams that have potential to improve viability.

Support for Employers

It is Karingal's experience that employers are not aware of the many supports and incentives that are available to them. In particular, Jobs in Jeopardy is underutilised because of poor awareness amongst both employers and workers with a disability. When workers do connect to Disability Employment Services and are advised of Jobs in Jeopardy unfortunately it often too late and retention of employment is beyond salvage. Job in Jeopardy as a name has poor connotations and employers are reluctant to sign something that says an employee's job is at risk as a result of their disability. Positively reframing Jobs in Jeopardy in the context of a reformed disability employment services would enhance opportunities to strengthen retention of employment.

Employers' report administrative requirements required to access supports diminish their value and comments indicate that this experience reinforces that employing someone with a disability is difficult. It is not surprising therefore that application to the Employment Assistance Fund is most commonly submitted by employment services providers.

The support needs of large employers are quite different to that of small and medium enterprises. While large employers support disability employment and offer a volume of employment opportunities they are less likely to take candidates without the full required skill set or customise a job for an individual. Incentives are not a significant influencing factor in the employment decisions of large organisation and they are more likely to have significant HR resources, use technology and recruitment firms to source candidates. In contrast small to medium enterprises are more likely to engage with disability employment for recruitment, more likely to customise a role to an individual and value incentives and supports available to them. Small and medium employers also demonstrate value for ongoing support to assist the worker and themselves as the employer.

Concluding Comments

Karingal welcomes a reform of the disability employment service framework that adopts principles reflective of those applied in the National Disability Insurance Scheme. While noting that they should remain distinct and separate increasing complementarity and joined up approaches between these initiatives will enhance outcomes for persons with a disability. The National Disability Insurance Scheme is still in the trial phase and much is yet to be learned from its implementation. Reform of disability employment services should be undertaken in a manner which mitigates risk and produces a evidence based design that is trialled and evaluated prior to implementation.

Attachment 1 - Karingal Social Inclusion Initiative – Big Day Out

Karingal BacLinks Program

BacLinks was created by Karingal in 2003 as an initiative to create opportunities and facilitate business and community engagement and collaboration for social benefit. BacLinks promotes and facilitates corporate citizenship and enables the private sector, community sector and individual community members to share resources and knowledge. BacLinks coordinates projects on behalf of community and business partners that address local needs and strengthen community capital. These projects involve hands on contribution through employee volunteering, sharing of knowledge and mentoring, as well as financial contributions and donations of goods and services. Most projects bring together a diverse cross section of the community working side by side and contribute to community awareness and social inclusion. The centrepiece of these programs is the Workplace Big Day Out



Karingal BacLinks - Workplace Big Day Out

Each year local businesses are set the challenge to release staff to volunteer in the community for a day. The event brings together workplace volunteers and persons with a disability in a range of recreational activities such as ten pin bowling, art and craft, cricket, netball, soccer, bocce, dancing, martial arts, ball games, waterslides, canoeing and mini golf just to mention a few. Workplace volunteers are teamed up with participants with a disability and take part in a rotation of these activities. This event is held twice yearly; Winter Big Day Out and Summer Big Day Out with around 300 community participants in each event.



The joys of giving

One of the meaningful ways businesses can help their community is through employee volunteering. Encouraging staff to assist at events and projects not only helps meet a range of community need, but also provides participants with a wonderful experience that nourishes their being and develops their personal and professional skills.

THERE have been two recent examples of the breadth of employee volunteering opportunities facilitated by BacLinks, a division of Karingal: the 2012 Winter Workplace Big Day Out, a major event held twice a year, and the Alcoa - SecondBite project.

The Workplace Big Day Out brings together employee volunteers from a range of local businesses, sporting and social clubs, schools and program members from local disability services to enjoy an inclusive day of fun and challenges. The event showcases the many ways diverse members of our community can come together to support each other and provides an opportunity to engage with people who otherwise may never have the opportunity to meet.

"The BacLinks Workplace

Big Day Out is educational and enlightening, but most of all, it's a lot of fun for everyone involved," Karingal Chief Executive Officer, Daryl Starkey said. "It also aims to combine people with disabilities and employee volunteers from the business sector in a fully supported environment where everyone can learn, have a great time and form friendships."

This recent event was generously presented by Powercor and sponsored by MatchWorks, Harwood Andrews Lawyers and St John of God Pathology/ Pathcare. Over 60 employee volunteers and around 100 program members from Karingal, Encompass and St Laurence engaged in activities provided by Sport and Recreation students from the Gordon, and representatives from Badminton Geelong and You



Can Too Weight Loss and Fitness. The BBQ lunch was donated by WJM Lawyers and prepared and served by the Rotary Club of Highton. The Geelong Jukebox Rockers got people up and dancing to finish off the day on a high note.

Event feedback highlights the significant benefits of participation in this event with employee volunteers reporting it as "an incredible experience", and one that broke down barriers and provided a glimpse of the realities people with disabilities face daily in their lives.

"The Workplace Big Day Out showed me that I don't need to treat people with a disability really any differently to people without one," said one employee volunteer, while another reported that whilst the event was challenging, "the personal rewards were very satisfying."

Although Alcoa's contribution of employee volunteers to assist SecondBite regulars sort surplus fresh food and produce ready for distribution was a much smaller project, the benefits and rewards for everyone involved are equally as strong.

The Geelong branch of SecondBite collects food from a variety of sources and distributes it to local community programs that pass the food on to people in need. It is an important program that has high demands on its resources

and volunteer support can help ease that burden.

As part of their strong commitment to support their community, Alcoa Point Henry has an established calendar of community involvement facilitated by BacLinks that gives their employees opportunity to volunteer in the community during work hours.

According to Alcoa Point Henry Smelter Human Resource Business Partner, David Monahan, Alcoa's employees were keen to contribute to Second Bite's impact in Geelong once again after volunteering in June 2011.

"Our employees value the time spent with SecondBite because it allows them to give back to the community and increase Geelong's sustainability at the same time" he said.

These two examples highlight the mutual benefits that can be realised from business-community partnerships facilitated by BacLinks. If your business is interested in contributing to your community in a meaningful way, BacLinks can coordinate employee volunteering and other in-kind support options that will suit your business capacity and ideals.



Spirit of Giving Ends Year on High

The camaraderie and care shown by all present at this year's Summer Workplace Big Day Out, BacLinks' signature event at Adventure Park, provided a fitting end to a year of generous support for local community programs from the BacLinks business network.

A large turnout of employee volunteers, program members from disability agencies, agency staff and sporting and service club representatives, got together on December 1st to enjoy a day of physical and social activities. The event, presented by Alcoa of Australia and sponsored by MatchWorks, Telstra Country Wide and Karingal Training, kicked off with ice breaker challenges for the employee volunteers, designed to help them to get to know each other and better understand disability. Shortly after, everyone joined up to form teams before taking on a range of inclusive activities, including martial arts, bocce, picnic games,

volleyball and cricket, as well as a selection of Adventure Park activities. These were followed by a BBQ lunch, prepared by the Rotary Club of Highton and provided by Whyte Just & Moore and Nardi Produce. After lunch, the day was rounded off with some entertaining dance instruction for those with still enough energy to spare. The event was thoroughly enjoyed by all participants, and employee volunteers made it clear that the day was rewarding, with comments like "it is such a good insight into life" and "it was the best day I have experienced for a long time".

Those present at the event were not the only businesses this year to experience the personal and professional benefits of sharing business resources with the community. 2011 saw a real increase in knowledge of the BacLinks program, with community groups coming forward to register a large variation of calls for support and

businesses wanting to know the most appropriate agencies to donate their excess or pre-loved resources. It is here where the serendipitous magic of the BacLinks program can present itself, giving us a glimpse of what the program aims to see as the norm, whereby a business registers free resources that happen to completely match the need of a community partner.

A beneficiary of such magic in 2011 was Rainbow Riders. Rainbow Riders is one of Geelong's smallest children's charities and prides itself on the ability to enhance and change the lives of disadvantaged children, children with a disability and those who may otherwise be at risk through innovative and unique farm and equine programs. As with many community programs, funding is limited and there is a reliance on the generosity of others to gain resources that are outside of core program needs. Rainbow Riders approached BacLinks to assist in sourcing equipment to improve the ability of the program's new administration staff to operate with increased functionality and efficiency. Several days later, Telstra Country Wide approached BacLinks wanting to know if there was a community agency in need of quality second hand office equipment. Rainbow Riders gratefully accepted 2 large adjustable height corner desks, a large lockable storage cabinet, 3 small laminate filing cabinets, 8 basic chairs, 1 office chair, 1 small coffee table and 1 lounge chair, as well as small office accessories such as document holders and brochure holders.

"Contributions such as these and the coordination provided by BacLinks have been instrumental in helping us to provide the best possible programs to children attending Rainbow Riders. We are now comfortable, safer and will be more productive as a result!" said Rikki Raadsveld, Rainbow Riders Executive Officer.

Other beneficiaries of recent similar exchanges are Barwon Youth, The Dress Up Place, Grovedale Neighbourhood House, Glastonbury Community Services, Leisure Networks, St. Laurence Community Services and disadvantaged job seekers from MatchWorks. These agencies benefited from the generosity of staff at Alcoa, Rotary Club of Highton, GMHBA, GPAC, Barefoot Media, Mercure Hotel, Australian Red Cross Blood Service, Principle Focus, Buxton Real Estate, Centrelink, Target, The Athletes Foot, WHK, and Dsign Diezel Group.




BacLinks