

New Disability Employment Services from 2018

Vision 2020 Australia response to the Department of Social
Services

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General Comments

Vision 2020 Australia welcomes the opportunity to provide comment to the Department of Social Services (the Department) on the New Disability Employment Services (DES) from 2018. Access to meaningful employment free from discrimination is a fundamental human right of all Australians and is essential for building a prosperous and egalitarian society. Rewarding employment is integral to an individual's ability to remain independent, empowered and connected with their community; maximising opportunities for participation in all aspects of daily life. Vision 2020 Australia holds that DES plays an essential role in improving the social and economic participation of people with disability. Vision 2020 Australia is pleased to see that, in line with the principles underpinning the National Disability Insurance Scheme (NDIS), the new DES is centred on increasing participant choice and control over the services participants need to engage in meaningful economic and social life.

People who are blind or vision impaired and people with a disability more broadly, remain significantly underrepresented in the workforce and face multiple barriers when it comes to participating in employment. Nearly one in seven working aged Australians (16-64 years) are living with a disability with a workforce participation rate of just 53.4 per cent, compared to 83.2 per cent for the remainder of the population.¹ More so, it is estimated that 58 per cent of working aged Australians who are blind or vision impaired are unemployed and one third of those who are employed would like to work more hours, highlighting the issue of underemployment.² It is estimated that if an additional 100,000 people with disability were employed by 2050, this would add an additional one per cent to Australia's Gross Domestic Product.³

Vision 2020 Australia broadly supports the submissions put forward by our member organisations, including Vision Australia and sector partner Guide Dogs Australia, both of whom provide services and supports to people who are blind or vision impaired. In the following submission, Vision 2020 Australia asserts a number of recommendations to the Department on how DES can be better administered and formulated to ensure consumer choice and control and better meet the needs of people who are blind or vision impaired and people with disability more broadly.

Vision 2020 Australia

Established in October 2000, Vision 2020 Australia is part of *VISION 2020: The Right to Sight*, a global initiative of the World Health Organisation and the International Agency for the Prevention of Blindness. Vision 2020 Australia is the national peak body for the eye health and vision care sector, representing over 50 member organisations involved in: local and global eye care; health promotion; low vision support; vision rehabilitation; eye research; professional assistance and community support.

This submission has been developed in collaboration with the Vision 2020 Australia Independence and Participation Committee (the Committee). The Committee brings together a diverse group of members providing services and supports to people who are blind or vision impaired across Australia; enabling an unique platform for stakeholders to collaborate, foster consensus and develop a shared understanding on matters of significance affecting member organisations and consumers.

¹ Australian Bureau of Statistics, Disability, Ageing and Carers, Australia: First Results, 2015, available at <http://www.abs.gov.au/ausstats/abs@.nsf/mf/4430.0.10.001>

² Vision Australia, Employment Research Survey Report, Research and Measures Team, May 2012.

³ Australian Government Productivity Report, Disability Care and Support, August 2011, available at <http://www.pc.gov.au/inquiries/completed/disability-support/report>

1 Recommendations

Vision 2020 Australia recommends that the Australian Government:

Recommendation 1: Ensures that DES participants have genuine choice and control in selecting their provider, regardless of region or distance.

Recommendation 2: Ensures that Centrelink Assessors are appropriately resourced, trained and informed of the range of needs of people who are blind or vision impaired and the services and supports available to ensure best employment outcomes.

Recommendation 3: Ensures that DES participants are allowed to voluntarily transfer or switch providers two times annually.

Recommendation 4: Ensures that DES participants are well educated by the Department and DES providers on the Complaints Resolution and Referral Service.

Recommendation 5: Ensures that a specific trigger mechanism is implemented to identify applicants who are blind or vision impaired to ensure effective passage through the DES Gateway and assessment process.

Recommendation 6: Leverage of the existing expertise and knowledge and engage with the eye health and vision care sector to provide training and support to increase the knowledge of Centrelink assessors on the needs of people who are blind or vision impaired.

Recommendation 7: Ensures that service delivery is tailored to the individual needs of the participant.

Recommendation 8: Ensures that Job Plans are determined between each participant and their provider, taking a holistic view to the person.

Recommendation 9: That the Australian Government ensures that DES providers employ a variety of career planning tools to ensure participants are involved in the development of their job plans.

Recommendation 10: Enable participants to rate DES providers using star ratings, so that consumers can share their opinion of available services.

Recommendation 11: Seeks expert advice from specialist groups on best practices and guidelines, as this information already exists within the broad disability service provision sector

Recommendation 12: That organisations and representative bodies in the disability sector, including those with expertise in the eye health and vision care sector, are involved in the development of an information sharing system, to ensure expert knowledge on accessibility needs is available and utilised.

Recommendation 13: Implements a model of participant controlled funding for DES to allow participants to self-manage and direct their funds to a wide range of supports.

Recommendation 14: Open entry to new providers on the Panel every two years and that panellists are reviewed every two years.

Recommendation 15: Removes market share regulations and implements a consumer directed DES model.

Recommendation 16: Relax market share restrictions to allow specialist blindness and vision impairment service providers to access success fees outside of the current DES payment structure.

Recommendation 17: Introduces 51 employment regions to better align DES with jobactive and encourage participant choice and control.

Recommendation 18: Implement specific safeguards and regulations to ensure against the monopoly effect to enable consumer choice.

Recommendation 19: Implement a fees model with adequate weighting towards outcomes and with tiers of ratios depending on the complexity of the individual needs of the participant and the amount of investment required to achieve the outcome.

Recommendation 20: Implements a 52-week outcome payment and a four-week outcome payment to replace the job placement fee.

Recommendation 21: Extends the ESL program to all students with a disability as they enter year ten or earlier to ensure that job seekers who are blind or vision impaired are able to secure employment either before or after secondary school.

Recommendation 22: Ensures that any participant eligible for the Disability Support Pension (DSP) or National Disability Insurance Scheme (NDIS) is immediately eligible for DES assistance and able to register directly with a DES provider.

Recommendation 23: Ensures that people who are blind or vision impaired seeking DES support to have access to holistic specialised assessment to provide more choice, control and access to services

Recommendation 24: Implements a mechanism for participants to confidentially disclose if they feel their job is in jeopardy, in particular if they are feeling marginalised or discriminated in their workplace.

Recommendation 25: Rebrands the Job-in-Jeopardy program to the Job Upkeep Program or Employment Maintenance Program.

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2 Response to discussion points

2.1 More choice for participants

What, if any, restrictions should there be (for example, region or distance) on participants choosing to attend a provider?

Vision 2020 Australia is pleased to see that the Department is moving towards a new DES which is in line with the principles underpinning the NDIS, centred on increasing participant choice and control. People who are blind or vision impaired, and people with disability more broadly, like any other people, have the right to participate economically and socially in the workforce. People with disability have a range of skills, capabilities and interests to bring to the workforce. Supporting workplace diversity, leads to increased representation of people with disability in the public and private sector workforce and improves effectiveness and productivity.

Vision 2020 Australia holds that if the Australian Government is committed to putting genuine choice and control in the hands of DES participants then there should be no restriction on which provider the participant chooses to engage with. DES Participants should be empowered to select the provider which best meets their individual needs, goals and career aspirations regardless of distance or region.

Recommendation 1

That the Australian Government ensures that DES participants have genuine choice and control in selecting their provider, regardless of region or distance.

However, in order to make an informed decision it is essential that participants have access to relevant information on the various providers available as they present to the Gateway and Centrelink assessors. Vision 2020 Australia holds that knowledge and understanding to make an informed choice is at the centre of a consumer directed care approach, this in turn requires accessible information in a range of formats. In order to ensure that people who are blind or vision impaired are informed and empowered to make decisions it is critical that Centrelink Assessors are appropriately resourced and informed of the range of needs of people who are blind or vision impaired and the services and supports available to ensure best employment outcomes.

It is imperative that Centrelink assessors are aware of the range of services and supports people who are blind or vision impaired may require in entering the workforce. These include assistance with: orientation and mobility (i.e. using a white cane, dog guide, or training in using acentric viewing methods to optimise residual vision); training in braille or adaptive technology for literacy (i.e. screen readers or magnifiers or hand held magnifiers or close circuit televisions); occupational therapy (i.e. for learning new techniques around the workplace); peer or emotional support to deal with vision loss, or a range of aids and equipment to assist with their mobility or literacy. One way in which this aim could be supported is through the provision of appropriate training, education and awareness raising activities for Centrelink assessors.

Recommendation 2

That the Australian Government ensures that Centrelink Assessors are appropriately resourced, trained and informed of the range of needs of people who are blind or vision impaired and the services and supports available to ensure best employment outcomes.

How often should participants be allowed to voluntarily transfer or switch providers?

It is the position of Vision 2020 Australia that the current strict requirements placed on participants wishing to voluntarily change providers restricts participant choice and control over the services they need to find meaningful employment. Removing current restrictions on provider transfers would allow participants greater flexibility to select a provider which best meets their individual needs. The creation of a more flexible system of access and inclusion in the DES environment is crucial and will help facilitate a performance based market. However, in allowing participants to voluntarily transfer or switch providers there must be a balance struck between choice and control and progression towards work.

Vision 2020 Australia acknowledges that transferring multiple times between DES providers in a short amount of time has the potential to compromise employment progression and reduce the likelihood that a participant will gain meaningful employment in line with their goals and aspirations. Therefore, there must be specific parameters and restrictions in place to ensure best outcomes. Vision 2020 Australia therefore recommends that participants should have the ability to voluntarily transfer or switch providers two times annually. This would allow for choice and control and acknowledge the opportunity to rectify a “mistake” in selection of an appropriate service provider.

Recommendation 3

That the Australian Government ensures that DES participants are allowed to voluntarily transfer or switch providers two times annually.

In addition, Vision 2020 Australia recommends that DES participants are well educated by the Department and DES providers on the Complaints Resolution and Referral Service this would act as a safeguard measure to allow participants to transfer providers if it can be demonstrated that the provider is not meeting certain standards.

Recommendation 4

That the Australian Government ensures that DES participants are well educated by the Department and DES providers on the Complaints Resolution and Referral Service.

What should be the basis of referral by Centrelink for participants who do not choose a provider?

Vision 2020 Australia members report that matching skillsets to appropriate job placements is a significant barrier to gaining employment. In some cases DES providers match people who are blind or vision impaired with a placement which is irrelevant to their skills and career aspirations. Vision 2020 Australia holds that the needs of jobseekers that are blind or vision impaired are best met by specialist providers who assist participants to get job fit and adjusted to their environment. Vision 2020 Australia member organisations support people who are blind or vision impaired to find open employment that matches their interest, skills and needs. A specialist DES provider offers services with a view to the holistic person, providing services and supports that a generalist DES providers may not, such as orientation and mobility training, occupational therapy and assistive technology training. This approach allows for a holistic evaluation of how a person who is blind or vision impaired can be best supported to find suitable employment, while also taking into account their individual needs.

Vision 2020 Australia recommends that as soon as a person who is blind or vision impaired presents to the Gateway or Centrelink that this should trigger a referral to a specialist in blindness and vision impairment. This trigger will need to ensure an effective passage, by providing the option for a

specialist assessment undertaken by a specialist service provider in blindness and vision impairment to substantiate the correct services and supports to meet the identified needs.

Recommendation 5

That the Australian Government ensures that a specific trigger mechanism is implemented to identify applicants who are blind or vision impaired to ensure effective passage through the DES Gateway and assessment process.

In addition, it is essential that appropriate training is provided to Centrelink assessors, so that at the point of referral they can best match participants with the most appropriate provider relevant to their specific needs. This aim could be supported through the provision of appropriate training and awareness raising activities specific to people who are blind or vision impaired. It makes sound economic sense to leverage the existing skills and expertise of the eye health and vision care sector to ensure that Centrelink assessors are able to provide the most appropriate referrals with a view to the holistic person. Vision 2020 Australia therefore recommends that the Department leverage of the existing expertise and knowledge and engage with the eye health and vision care sector to provide training and support to increase the knowledge of Centrelink assessors on the needs of people who are blind or vision impaired.

Recommendation 6

That the Australian Government leverage of the existing expertise and knowledge and engage with the eye health and vision care sector to provide training and support to increase the knowledge of Centrelink assessors on the needs of people who are blind or vision impaired.

2.2 Provider/Participant Contacts

Should face-to-face requirements remain as part of the DES service delivery?

Vision 2020 Australia notes that face-face meetings with DES service providers are preferable as direct contact enables providers to understand the different nuances and complexities of the participant, for example through assessing body language. This in turn allows providers to best match participants with employment that suits their skills sets and individual needs. More so, face-to-face meetings are generally more engaging, participant driven and efficient.

However, in order to truly provide choice and control to participants and ensure flexibility in service delivery it is essential that DES participants are able to access services in a variety of ways to best suit their individual needs. Telephone, email and video link services can be used to successfully deliver services for people who are blind or vision impaired, and may be the preferred method of communication in many circumstances. Vision 2020 Australia notes that face-to-face contact is not always the most convenient or suitable method of delivering services to participants, particularly in rural and remote areas where there may be limited means of transport or where the specialist service provider resides outside of the participants region. Therefore, Vision 2020 Australia recommends that face-to-face requirements should not remain mandatory as part of DES service delivery and that service delivery should be tailored to the individual needs of the participant.

Recommendation 7

That the Australian Government ensures that service delivery is tailored to the individual needs of the participant.

2.3 Job Plans

Should Job Plans have minimum requirements beyond what is necessary for mutual obligation requirements?

Job Plans underpin the provision of DES services and ensure mutual accountability between providers and participants. In putting choice and control in the hands of consumers it is essential that participants have genuine input in the development of their Job Plans. Allowing participants to actively engage and participate in their Job Plans qualifies a sense of ownership and ensures that the plan is tailored to the individual goals and aspirations of the individual.

Vision 2020 Australia holds that Job Plans should be tailored to the individual needs of the participant taking a holistic view to the person. The development of a Job Plan should assess an individual's career aspirations, goals, skills, strengths, weaknesses and the steps, services and supports required to meet the participants employment goals. There should also be adequate time to review and reassess Job Plans, keeping in mind that participant's goals and career objectives may change over time. Furthermore, for participants living with a degenerative eye condition, functional vision loss may change over time. Under these circumstances an individual should have their Job Plan modified to reflect the changing nature of their condition and to ensure that they are receiving the most appropriate supports and services to improve workforce participation. Vision 2020 Australia therefore recommends that Job Plans should be determined between each participant and their provider and tailored to the individual and holistic needs of the consumer.

Recommendation 8

That the Australian Government ensures that Job Plans are determined between each participant and their provider, taking a holistic view to the person.

How can we ensure that participants are actively involved in the development of their Job Plans, or will the ability of participants to change providers if unsatisfied be sufficient?

Vision 2020 Australia holds that it is essential that participants are actively involved in the development of their Job Plans. Involving participants in all aspects of DES will empower people with disability to have a genuine say on the reforms that affect their lives and will work to improve overall accountability and employment outcomes. An important first step in ensuring consumer participation is to certify that DES providers are appropriately resourced, trained and informed to identify and respond to the needs of people who are blind or vision impaired. This includes education on the multiple barriers, including experiences of discrimination, that exist for people who are blind or vision impaired when it comes to participating in the workforce. Furthermore, it is essential that where appropriate DES providers are able to refer participants to specialists in blindness and vision impairment.

It should be noted that jobseekers that have been unemployed for some time may require a series of steps to re-build job-readiness which could include job shadowing, mentoring, community participation and a system that allows for setbacks. Furthermore, for people who are blind or vision impaired and have no experience in the workforce, DES providers should ensure that steps are taken to build confidence and harness skills and strengthens so that they feel job-ready. It is the position of Vision 2020 Australia that DES providers should employ a variety of career planning tools to ensure participants are involved in the development of their job plans. Such tools could include connecting participants with mentors, such as person who are blind or vision impaired and already successfully in the workforce, organising for participants to undertake work experience in their preferred field, arranging support programs to address any issues or concerns, assistance to develop strong self-advocacy skills and identifying education or accredited training requirements required for the participants chosen career.

Recommendation 9

That the Australian Government ensures that DES providers employ a variety of career planning tools to ensure participants are involved in the development of their job plans.

How should providers be held accountable to ensure activities in the Job Plan are undertaken and supports are delivered?

Vision 2020 Australia holds that putting choice and control in the hands of participants, including the ability of participants to change providers up to two times annually, is sufficient to ensure that providers are held accountable. In addition, it will be important that participants are well educated on the Complaints Resolution and Referral Service to ensure that providers are held accountable to the activities within the Job Plan.

More so, Vision 2020 Australia recommends that participants should be able to rate DES providers using star ratings, similar to a Trip Advisor platform where consumers can share their opinion of available services. This would ensure quality service provision and would help drive transparency and innovation in the sector.

Recommendation 10

That the Australian Government enable participants to rate DES providers using star ratings, so that consumers can share their opinion of available services.

2.4 Better Information for Participants

Should the Department facilitate access to information on accessible and user friendly platforms, or should this be purely market led?

Access to information is at the centre of participant choice and control. Vision 2020 Australia believes that the Department should lead by example and be responsible for facilitating access to information on accessible and user friendly platforms. This cannot be left purely to the marketplace. Vision 2020 Australia notes that people who are blind or vision impaired access information in a range of alternative formats and that many individuals have a preferred format.

It is thus essential that all information and forms of communication in relation to the DES be produced in a range of alternative formats as per best practice and should be made accessible to all consumers. These formats include braille, electronic text, audio and large print and where possible, all efforts should be undertaken to ensure these formats are available at the same time as other formats rather than upon request. It makes sound economic sense to leverage the existing skills and expertise of the disability sector to ensure accessibility within the aged care system. Therefore, Vision 2020 Australia recommends that the Australian Government seeks expert advice from specialist groups on best practices and guidelines, as this information already exists within the broad disability service provision sector.

Recommendation 11

That the Australian Government seeks expert advice from specialist groups on best practices and guidelines, as this information already exists within the broad disability service provision sector.

Additionally, content and information made available on the Gateway and associated DES websites should be created in ways that support and maximise accessibility. Vision 2020 Australia notes that the Australian Government has endorsed the Web Content Accessibility Guidelines (WCAG) version 2.0 AA rating for all government websites. Vision 2020 Australia recommends that the Department develop information relating to DES in accordance with these guidelines, considering the varied needs of users and plan for accessibility from the outset.

Vision 2020 Australia recommends that organisations in the disability sector, including the eye health and vision care sector, are involved in the development of an information sharing system, to ensure expert knowledge on accessibility needs is available and utilised.

Recommendation 12

That the Australian Government ensures that organisations and representative bodies in the disability sector, including those with expertise in the eye health and vision care sector, are involved in the development of an information sharing system, to ensure expert knowledge on accessibility needs is available and utilised.

2.5 Participant Controlled Funding

In line with the principles underpinning the NDIS, Vision 2020 Australia supports participant controlled funding and consumer choice when it comes to DES. A participant controlled funding model for DES respects the dignity and worth of people who are blind or have vision impaired and people with disability more broadly. Vision 2020 Australia holds that transitioning DES to participant controlled funding will provide greater flexibility and tailored Job Plans that meet the individual needs of people who are blind or vision impaired, thereby improving employment outcomes.

Should a participant controlled funding model be applied, participants could direct their funding to a wider range of supports outside of DES. This would allow specialist blindness and vision impairment services to deliver a transdisciplinary service to get people who are blind or have vision impaired job ready and into the workforce. Funds could also be spent on addressing vocational and non-vocational barriers to employment as well as training and skills development. In addition, a participant controlled funding model will create a more competitive marketplace between DES providers, fostering greater innovation and better service delivery, as consumers will spend their allocated funding on the provider which best meets their individual needs. Vision 2020 Australia recommends that participant controlled funding should be opened up to allow participants to self-manage their funds, as is the case with the NDIS. The value of a participant controlled funding package should be based on the individual needs of the person and align with the participants job plan.

Recommendation 13

That the Australian Government implements a model of participant controlled funding for DES to allow participants to self-manage and direct their funds to a wide range of supports.

2.6 Entering the DES Market

How often should the Panel be open to entry by new providers and how often should panellists be reviewed?

Vision 2020 Australia supports increasing greater market flexibility as this would lead to increased competition and stronger incentives for providers to deliver efficient and effective services. These benefits would flow on to participants through improved job outcomes. Vision 2020 Australia recommends that the Panel is open every two years and that reviews should occur every two years. The review should be based on the quality of the service as opposed to being measured solely by service outcomes.

Recommendation 14

That the Australian Government open entry to new providers on the Panel every two years and that panellists are reviewed every two years.

2.7 Removing Market Share Restrictions

Under highly regulated market share restrictions providers are guaranteed a proportion of participant referrals regardless of their overall performance. This means that DES providers achieving poor outcomes for participants continue to be rewarded for less than average service. In line with current reforms to disability and aged care, Vision 2020 Australia encourages the removal of market share restrictions with a focus on consumer directed care. Vision 2020 Australia supports transition to a culture that provides consumers with greater flexibility and choice over their individual needs. Person centred care is the basis of quality care and a consumer driven DES. It positions the individual at the centre of decision making over the supports required to achieve meaningful employment. A key principle behind a consumer directed care approach is that the quality of a particular service will be determined by the extent to which the service being provided is personalised to the specific needs of each individual. Removing market share regulations would drive innovation, competition and choice in DES. As a result DES providers will need to move to flexible workforce arrangements and service delivery in order to meet the needs of individual consumers. Moreover it will be essential for service providers to market themselves and inform consumers about the benefits of their services.

Recommendation 15

That the Australian Government removes market share regulations and implements a consumer directed DES model.

Furthermore, Vision 2020 Australia holds that blindness and vision impairment service providers, who are working to achieve positive employment outcomes for people who are blind or vision impaired, should be operating in a system where they can be directly paid for outcomes achieved. Importantly, blindness and vision impairment service providers should also have the flexibility to include these payments as part of their business model. Being compelled to involve the added layer of DES providers does not always result in efficient outcomes and potentially, the current model fails to acknowledge other service providers who actually facilitate the employment outcome. Vision 2020 Australia therefore recommends that the Australian Government relax market share restrictions to allow specialist blindness and vision impairment service providers, which are already working to achieve positive outcomes for participants and are not necessarily DES providers, to access success fees outside of the current DES payment structure. This could be similar to the NDIS where providers can apply to be recognised as registered providers. Registered providers of supports have met requirements regarding qualifications, approvals, experience and capacity for the approved supports

Recommendation 16

That the Australian Government relax market share restrictions to allow specialist blindness and vision impairment service providers to access success fees outside of the current DES payment structure.

2.8 Employment Service Areas (ESAs)

Should there be ESAs, if so, how many ESAs should there be?

The rigidity of the current ESA structure reduces choice and control for participants and lessens competition between providers. Reducing the number of ESAs from the current 110 to 51 based on local labour market regions would better align with jobactive, thereby reducing administrative burden on DES providers. More so, it would improve overall participant choice and

control for people who are blind or vision impaired and people with disability more broadly, on the services they need to participate in the workforce.

Recommendation 17

That the Australian Government introduces 51 employment regions to better align DES with jobactive and encourage participant choice and control.

2.9 Preventing Market Failure

Vision 2020 Australia acknowledges that transitioning to participant controlled funding and removing market share regulations may result in smaller DES providers that lack adequate resources to adapt to a new funding paradigm, may be squeezed out of the marketplace. Smaller DES providers will need to take a strategic approach in transitioning to an open marketplace. In particular, smaller DES providers will need to review their operations and potentially explore other business options to survive. In order to meet these challenges Vision 2020 Australia recommends the implementation of specific safeguards and regulations to work against the monopoly effect. These safeguards will work to ensure that the market contains the full range of DES options wherever possible so that participants have real choice and control over the services and supports they need to enjoy meaningful employment.

Recommendation 18

That the Australian Government implement specific safeguards and regulations to ensure against the monopoly effect to enable consumer choice.

2.10 Ratio between service fees and outcome fees

Vision 2020 Australia holds that the current DES funding model is weighted too heavily on service fees, with evidence to suggest that many DES providers are able to survive financially on service fees alone. This ratio can create a disincentive to pursue outcomes for participants. Vision 2020 Australia supports a model which is based on producing positive and meaningful outcomes for participants and believes that there needs to be adequate provision for DES providers to be compelled to reward supporting specialist agencies outside the DES network.

Vision 2020 Australia recommends that there needs to be adequate weighting on outcome fees to ensure that DES providers are compelled to achieve the results set out in an individual's Job Plan. The ratio between service fees and outcome fees needs to ensure that DES providers are not simply parking harder-to-place participants and 'creaming' participants most likely to achieve 26-week outcomes. Vision 2020 Australia recommends the implementation of fees model with adequate weighting towards outcomes and with tiers of ratios depending on the complexity of the individual needs of the participant and the amount of investment required to achieve the outcome.

Recommendation 19

That the Australian Government implement a fees model with adequate weighting towards outcomes and with tiers of ratios depending on the complexity of the individual needs of the participant and the amount of investment required to achieve the outcome.

2.11 4-week and 52-week Outcome Payments

It is the position of Vision 2020 Australia that the current model of payment outcomes does not provide adequate incentive to achieve long-term sustainable outcomes for participants. If the overall aim of the DES program is to ensure that people with disability are engaged in

meaningful employment relevant to their skill set and career objectives, then there must be greater emphasis on long term employment outcomes. Vision 2020 Australia therefore recommends that the Australian Government implements a 52-week outcome payment to encourage providers to place participants in meaningful and long-term employment.

Vision 2020 Australia member organisations report that some DES providers match people who are blind or vision impaired with whatever placement available, rather than matching them to jobs that take their individual interests, strengths and weaknesses into account. This often acts as a disincentive for both employers and people who are blind or vision impaired to continue exploring employment options. Vision 2020 Australia holds that poor job placements resulting in unsuccessful or short term placements are due, in part, to the job placement and outcome fees that can be claimed by DES Providers. Vision 2020 Australia therefore supports a four-week outcome payment to replace the job placement fee. This will discourage DES providers from collecting fees by placing participants in jobs that do not match their abilities or interests.

Recommendation 20

That the Australian Government implements a 52-week outcome payment and a four-week outcome payment to replace the job placement fee.

2.12 Determining Eligibility and Employment Outcomes for Eligible School Leavers (ESLs)

Who should be able to qualify under revised assessment criteria for ESLs?

Vision 2020 Australia recognises the importance of long-term career planning for people who are blind or vision impaired and people with disability more broadly. Vision 2020 Australia member organisations working with young job seekers acknowledge that the transition from formal education to employment is a vulnerable time for young people. Access to career planning, counselling and guidance at the earliest possible stage is essential to ensure that people who are blind or vision impaired have the appropriate skills and training to obtain employment in their chosen field. Vision 2020 Australia recommends that in order to mitigate some of the negative ramifications during this transition phase that career counselling must be available to young people with disability as soon as they enter secondary education to prepare for and discuss the pathway to their preferred career option.

Therefore, Vision 2020 Australia recommends that the ESL program should be extended to all students with a disability as they enter year ten or earlier to ensure that job seekers who are blind or vision impaired are able to secure employment either before or after secondary school. One way in which employment outcomes for young people with disability can be improved is through the implementation of disability internship initiatives, cadetships and apprenticeship. A disability internship initiative, cadetship or apprenticeship would promote job readiness for young people with disability and stimulate career pathways while simultaneously increasing visibility with the view to diminish negative attitudes and misconceptions surrounding people with disability.

Recommendation 21

That the Australian Government extends the ESL program to all students with a disability as they enter year ten or earlier to ensure that job seekers who are blind or vision impaired are able to secure employment either before or after secondary school.

More so, Vision 2020 Australia holds that ongoing career guidance, counselling and planning should be provided to people who are blind or vision impaired throughout the life course who are

seeking a promotion or career change. The benefits of long term career guidance could extend through to retirement and beyond.

2.13 Improving the Gateway

How can gateway arrangements be improved to enable a better connection to employment services for people with disability?

Vision 2020 Australia members report a number of issues and concerns with the current gateway and assessment processes. In particular that the assessment processes is time consuming and confusing for participants. The pathway into DES for people with a disability is through a Job Capacity Assessment (JCA) or Employment Services Assessment (ESAT). Vision 2020 Australia member organisations report lengthy waiting periods with participants having to wait up to two months. Vision 2020 Australia recommends that the assessment burden could be significantly reduced by ensuring any participant eligible for the Disability Support Pension (DSP) or NDIS is immediately eligible for DES assistance and able to register directly with a DES provider.

Recommendation 22

That the Australian Government ensures that any participant eligible for the Disability Support Pension (DSP) or National Disability Insurance Scheme (NDIS) is immediately eligible for DES assistance and able to register directly with a DES provider.

Vision 2020 Australia is pleased that the Department is looking to review the Gateway and current assessment process to determine specific changes required. Vision 2020 Australia welcomes the opportunity to provide feedback on the Gateway, current assessment process and how this will interact with the Disability Support Pension (DSP), the NDIS and the revised DES funding model.

2.14 Assessments Review

It is the position of Vision 2020 Australia that the assessment process must be reviewed, as current assessments by general assessors are not adequate for people who are blind or vision impaired. Vision 2020 Australia recognises that the employment needs of people who are blind or vision impaired are diverse and dependent on an individual's goals, strengths and weaknesses. Vision 2020 Australia recommends that as soon as a person who is blind or vision impaired presents at the Gateway that this should trigger a referral to a DES specialists in blindness and vision impairment. This trigger will need to ensure an effective passage, by providing the option for a specialist assessment undertaken by a specialist service provider in blindness and vision impairment to substantiate the correct services and supports to meet the identified needs.

More so, the eye health and vision care sector considers it critical for people who are blind or vision impaired seeking DES support to have access to holistic specialised assessment to provide more choice, control and access to services. It is vital that a holistic specialist assessment is undertaken by trained professionals with specialist expertise in blindness and vision impairment, with a view to the person's needs so that they can improve their employment outcomes.

Recommendation 23

That the Australian Government ensures that people who are blind or vision impaired seeking DES support to have access to holistic specialised assessment to provide more choice, control and access to services

2.15 Job-in-Jeopardy (JiJ)

How can we better define when someone's employment is considered to be at risk due to their disability?

In order to understand when a participant's employment is at risk due to their disability, Vision 2020 Australia recommends that there should be a mechanism in place for participants to confidentially disclose if they feel their job is in jeopardy, in particular if they are feeling marginalised or discriminated in their workplace.

Recommendation 24

That the Australian Government implements a mechanism for participants to confidentially disclose if they feel their job is in jeopardy, in particular if they are feeling marginalised or discriminated in their workplace.

Vision 2020 Australia member organisations report a number of reasons why participants who are blind or vision impaired may be considered at risk. These reasons include: a lack of access to accessible information in preferred format; access to transport options; orientation and mobility within and around, and to and from, employment; and lack of assistive technology support at the outset and during employment. Employers often lack knowledge on the technology needs of people who are blind or vision impaired and are unaware of the workplace assessments available and technology procurement processes through Job Access.

Information, communication and technology (ICT) procurement policies can act as a significant barrier to workforce participation for people who are blind or vision impaired. Vision 2020 Australia welcomes the recent announcement of the Australian Government of their intent to adopt an Australian Standard on ICT accessibility to support access to ICT for people with disability.

How can we increase employer awareness of JiJ?

Vision 2020 Australia recommends that employer awareness of JiJ could be expanded through the provision of appropriate training, education and awareness raising activities for employers on the needs of people with disability, including the specialist needs of people who are blind or vision impaired. This training needs to be tailored to the individual needs of the employer to assist their capacity to support people with disability in the workplace.

What is a more appropriate name for Job-in-Jeopardy?

Vision 2020 Australia member organisations working with job seekers are concerned that the name Job-in-Jeopardy is a barrier to people taking up the program as it has a number of negative associated connotations. Vision 2020 Australia recommends that the name should be changed to the Job Upkeep Program or Employment Maintenance Program.

Recommendation 25

That the Australian Government rebrands the Job-in-Jeopardy program to the Job Upkeep Program or Employment Maintenance Program.

3 Conclusion

Vision 2020 Australia welcomes reforms to Disability Employment Services and is strongly in favour of a model which actively promotes individual choice and control in line with the principles underpinning the National Disability Insurance Scheme.

Vision 2020 Australia appreciates the opportunity to provide comment to the Department of Social Services on this important issue, and welcomes any further participation and discussion on what is an important matter to the eye health and vision care sector.