

**16 December 2016**

**Vision Australia Submission to the Department of Social Services (DSS) on New Disability Employment Services from 2018**

**Submit to:** [**https://engage.dss.gov.au/**](https://engage.dss.gov.au/)**.**

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**Introduction**

Vision Australia welcomes the opportunity to respond to the “New Disability Employment Services from 2018” discussion paper.

Disability Employment Services (DES) is a vital service, capable of improving the social and economic participation of people with disability in Australia.

Vision Australia broadly supports the principles outlined in the discussion paper of: increasing participant choice and control over the services they receive; generating greater competition between providers; developing better incentives for providers to service all participants equally; and engaging employers to hire more people with disability.

While we provide a high quality DES service to our cohort, offering specialised advice and training as well as generalist job readiness support we have also developed ‘Skills for Life’, a strategy which aims to equip our clients with a broad range of skills, both vocational skills and ‘soft’ life skills which will give them the resources to pursue a meaningful and dynamic career.

Historically, once people who are blind or have low vision secure work, they remain in their job for a long time, for longer than their sighted peers. This tendency to remain in a job for a significant amount of time is thought to stem from a feeling of gratitude at being employed and the fear that it will be a very hard task to convince another employer to take them on.

We believe the advantages in moving jobs on a fairly frequent basis (every two years is seen as the average for millennials for example) must be attainable by people who are blind or have low vision. Moving jobs frequently can increase an employee’s salary, grow a career and provide the opportunity to find the right cultural fit for the employee.

We aim to build the capacity of our clients to have a meaningful career through a variety of programs and policies including the below programs.

We offer a Bursaries program which awards 25 recipients per annum with funds to buy adaptive technology which will assist them to complete tertiary studies.

Once clients have completed their higher education studies they are eligible to apply for our Graduate Program which is a new initiative employing graduates who are blind or have low vision with Vision Australia for a year.

We offer an online small business course which develops skills to operate online small businesses and we run an intensive three week pre-employment program designed by American specialist in blindness employment, Karen Wolffe.

It is important to note that most research that has been done in relation to disability employment focuses on the “supply” side. That is, most studies focus on what people with disabilities need to do to gain employment with little attention given to the “demand” side, the employer’s perspective. Research by Vision Australia in 2016 reveals that employer attitudes need to be addressed, to address perceptions that:

* the expense of special adjustments and technology is a barrier.
* workplace and system adjustments would be too disruptive.
* a person with vision impairment may be less efficient than other staff.
* 55% of employers have no link between their diversity strategy targets and management performance targets.

Vision Australia’s approach within and beyond DES includes:

* Approaching organisations at an Executive and Senior Management level to increase their awareness, understanding and commitment in employing people with blindness or low vision.
* Taking on an employer brokerage role with targeted employers e.g. Vision Australia corporate partners or other employer networks.
* Increasing opportunities for work experience programs.
* Focusing on training employers and employees to build their capacity to support people with blindness and low vision at work e.g. education on adaptive technology, job design, providing information in accessible formats and Government funding available.
* Reviewing current practices regarding employer disclosure to encourage positive employer-job seeker disclosure discussions that focus on abilities and possibilities not barriers.

In this submission we address each of the 20 discussion points and the proposed regulatory response.

**Discussion Point 1: More Choice for Participants**

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

There should be no restrictions as long as that person can access the supports they need from that provider and so long as the provider is able to deliver the required services. There must be staff available, for example, to deliver services. We support flexibility however the model introduced must provide a structure that supports the needs of clients. In terms of methods of service delivery by providers, we support a flexible approach to enable access to specialist expertise and advice, for example the use of videoconferencing where it is appropriate and delivers benefits to the client, and assists sustainable service delivery.

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

Vision Australia believes that if clients were able to transfer as many as five times in a two year period that would be likely to compromise their progression toward work.

Too many changes of providers reduce the likelihood of success. There must be a balance between a person centred approach and that which may be detrimental to the career progression of a client, and the program. To help minimise switching providers, Vision Australia recommends there be adequate education provided to clients around the consumer complaints process to assist in addressing issues, rather than just switching providers.

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

Referrals should be based on the specific needs of each client rather than based on whether the provider is the closest to the client in proximity. The priority must be on clients being referred to services that can assist them with their unique needs. For example, people who are blind or have low vision often require specialised services such as assistance with orientation and mobility, adaptive technology and training in independent living skills that augment skills to increase independence and work capacity.

**Regulation: Reduced**

**Participants and providers would no longer be required to demonstrate special circumstances for a participant to receive services outside of the ESA they live in. Removing the current restrictions on provider transfers would reduce regulation for participants as they would be able to move more freely between providers.**

Vision Australia supports this proposed regulation.

**Discussion Point 2: Provider/Participant Contacts**

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

Face-to-face should not be mandatory for consumers. The current provision for 6 contacts every 3 months is overly proscriptive. Requirements around service delivery must be flexible, innovative and dependant on the circumstances, needs and abilities of each client. There is also potential for technology to assist service delivery and access to expertise. Strict requirements to attend face-to-face meetings should be softened and negotiated on a case by case basis. For example, clients with low or medium support needs don’t generally require face-to-face as often as clients with higher needs.

1. **How often should participants and providers be required to meet, either face-to-face or by other means?**

The frequency of when clients should meet with their DES providers must be flexible and should be negotiated between the client and provider. Any requirement to meet must be supported by a meaningful output and benefit above any process requirement, for example an initial meeting to establish the Job Plan and identify relevant activities. Subsequent meetings by any mode should be held around identifiable goals and activities, and may be delivered flexibly in line with individual needs and circumstances. Vision Australia supports safeguards to empower clients to comply with the plan and meet their goals, and incorporating flexible provisions to enable monitoring, including the most appropriate timing and form of contact.

**Regulation: Reduced**

**Removing the requirement for providers to meet face-to-face with participants and removing minimum requirements would reduce regulation for participants and providers. Participants and providers could agree on the most appropriate timing and form of contact to suit the individual needs of the participant.**

We agree with the proposed regulation to remove the requirement for providers to meet face-to-face.

**Discussion Point 3: Job Plans**

1. **Should Job Plans have minimum requirements beyond what is necessary for mutual obligation requirements? Or should this be determined between each participant and their provider?**

Job plans should be determined between each participant and their provider. Vision Australia Job Plans are highly detailed and customised to the individual needs of each client. Our clients very often require intensive assistance both in basic job seeking skills and in blindness and low vision specific services. For this reason our Job Plans are detailed and we believe that all providers should meet this level of quality. We support measures that will provide for a more meaningful Job Plan, with input from the client.

Vision Australia believes there could be consideration of inclusion of a range of matters in the Job Plan that are aligned with a “Skills for Life” approach, helping to build the participant’s employability throughout their career.

We support also a clear articulation on the kinds of support and expertise that are being provided, to bolster participant control and choice in a competitive environment.

1. **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?**

The majority of our clients do not have mutual obligation rules to abide by; they participate on a voluntary basis so they are willing to be actively involved in their job plans.

Participants can be empowered by understanding the provider’s value proposition and ensuring they understand it is a joint responsibility and opportunity for the Job Plan to state very clearly what expertise and support is being provided that will add to the client’s prospects in achieving their goal.

Incorporating a “Skills for Life” approach, such as that which Vision Australia has been incorporating through our Karen Wolffe program, further bolsters the capacity of participants to understand and assert themselves in the actioning of their Job Plan.

1. **How should providers be held accountable to ensure activities in the Job Plan are undertaken and supports are delivered? Will the ability of participants to change providers if unsatisfied be sufficient?**

We believe that the ability for clients to move providers will be a sufficient method of encouraging provider accountability. Funding will follow the clients which is a huge incentive for providers to fulfil Job Plans. An effective Quality Assurance System with a well-developed complaints system and effective client education and support would also provide additional accountability measures for providers.

**Discussion Point 4: Better Information for Participants**

1. **What information should be available to participants, providers and employers?**

It is of utmost importance for participants who are blind or have low vision to have access to all the relevant information in an accessible format of their choice including Braille, large print, electronic, or audio.

Vision Australia would welcome the opportunity to work with the department on the development of disability specific job search links and fact sheets.

Information must be available about, for example, where to go to obtain assistance, information about provider performance and disclosure of consumer ratings. We support participants and the community generally to have access to information about the specific types of support that are made available by the provider. This would foster best practice among providers.

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. Similar proposals are being considered in disability, health and aged care. This would promote a greater focus by providers on quality of services, helping drive transparency and competition, and support participant control and choice.

1. **Should there be mechanisms to ensure no false or misleading claims are made against DES providers?**

We support mechanisms to protect false or misleading claims against DES providers. There must be a right of reply available for service providers when it comes to the online consumer ratings, a guideline and moderation. There must be a rigorous complaints process with an opportunity to resolve the complaint and defamatory comments must not be tolerated.

1. **Should the Department facilitate access to information on accessible and user friendly platforms, or should this be purely market led (with providers offering such information on platforms of their own choosing)?**

The Department must facilitate access to information to clients. The information should be provided in a user friendly platform and must be accessible to people who are blind or have low vision, who for example, access internet information with the use of screen reading software. It is Vision Australia’s experience that a purely market led approach will not ensure access to information, and we would support the inclusion of a clause within DES contracts that information is developed and provided on accessible and user friendly platforms.

**Regulation: Increased**

**Introducing more detailed Job Plans would increase regulation on providers as they would be required to record progress against activities and supports recorded in the Job Plan which is not currently required.**

We support this proposed regulation to introduce more detailed Job Plans.

**Discussion Point 5: Participant Controlled Funding**

1. **There is considerable literature and experience in participant controlled funding in personal care. Is there any evidence of the effectiveness of participant control of third party funding in employment services?**

We support an individualised funding approach, with access to specialist advice and assistance being promoted to participants, as exists for the NDIS. Participants are able to draw down on funding that is attached to supports that meet goals identified in their plans. In Home Care Program, the department publishes a list of items that can be purchased, and that cannot be purchased. This helps provide certainty and clarity for case managers and package recipients.

1. **In such a model, how much funding, if any, should be quarantined for job seekers to use through an account, how should this funding be made available to participants, and how could there be simple clarity as to what costs are to be met from participant controlled funds versus provider controlled funds?**

There should be limited participant funding available for job seekers to use through an account. The funding that is available must be spent within the objectives of the Job Plan, clients must be able to demonstrate that the expenditure is going to further their ongoing employment and be aligned with the objectives of their Job Plan. Each individual differs so there would need to be some flexibility. Similarly, potential participants may want discreet services, rather than having to sign up to a whole plan.

1. **What principles should guide the appropriate expenditure of any individualised funding?**

Vision Australia asks that the following items are included to help guide how individual funding would operate:

* Access to information in relevant accessible formats is essential for the purposes of planning, choosing and budgeting on the use of those funds.
* Education, advice and support in understanding how individual funding works, relevant processes and timing, to support responsible decision making.
* Expenditure must be linked to the participant achieving their employment goals.
* Clarity in what can and cannot be purchased.

1. **What restrictions should apply to the use of the funds by participants?**

We would support participants having access to quarantined funds to be spent on addressing relevant identified barriers to employment. Participants must have access to information in alternate formats to understand and plan their use in expending funds. Participants must not use funds for food or rent, or for purposes that may be funded out of the NDIS. Participants should be able to spend those funds on provider services not already funded by DES, which may enable innovation and support sustainability of specialist services while encouraging collaboration between relevant disability providers and mainstream services.

1. **How can participants who are unwilling or unable to use individualised funding be supported during the decision making process?**

Employment consultants and disability specialists must be available to assist participants who are unable or unwilling to useindividualised funding models or who require assistance with decision making. Planners along the lines of those employed to assist people with their applications for NDIS packages should be available for participants. Planners must have a broad understanding of disability. Vision Australia is a RTO and can provide training for planners to assist DES participants.

1. **What restrictions should apply to the expenditure of the funds on services from a participant’s provider or an associated organisation?**

There should be no restrictions on what funds may be used for other than those which would ordinarily apply for the use of taxpayer funding. Expenditure of the funds should be based on the Jobs Plan. Providers must be transparent in their offering and be open about their relationship with any associated organisation.

**Regulation: Increased**

**Introducing some individualised funding would increase regulation on providers as they would be required to keep a record of the goods and services purchased through the account. This is not required in the use of service fees under the current payment structure.**

Vision Australia supports individualised funding for participants and believes increased regulation will support this to occur through provision of appropriate safeguards for participants.

**Discussion Point 6: Entering the DES Market**

1. **How often should the Panel be open to entry by new providers?**

We recommend that the panel be open to entry by existing and new providers on a more regular basis than they currently are. The panel should be open annually. Providers should be able to demonstrate they meet the minimum criteria and can fill a need in the market.

1. **How often should panellists be reviewed and what criteria should they be reviewed against?**

Vision Australia believes 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.

1. **What should the basic criteria be for joining the Panel?**

The basic criteria for joining the panel should be that the provider has prior proven experience either in disability rehabilitation services or in delivering employment services.

1. **How much time do providers need before entering into a market to set up their operations?**

We estimate providers will need three months to set themselves up to enter the marketplace.

1. **In order to supply DES in a specific ESA what should the requirements be for?**

**a. minimum caseload?**

To supply DES in a specific ESA providers, must feel they have the resources to deliver employment services rather than requirements being based on minimum case load.

**b. ESA coverage?**

Vision Australia supports relaxing current restrictions on where and how providers operate. Being able to service clients from outside the ESA supports the principle of choice and enables participants to receive specialist supports and services they need that are not available through generalists. Vision Australia supports measures that will enable specialist providers to work in partnership with larger employers with a national footprint and be able to expand operations and match footprints accordingly.

**Discussion Point 7: A Single DES Contract**

1. **Would all providers have the capacity to deliver DES-DMS, DES-ESS and Ongoing Support under the proposed simplified contract arrangements?**

Vision Australia supports the reduction of red tape where it can be demonstrated that doing so will not diminish the quality of service or outcome received for the participant. If a provider can demonstrate the appropriate skill, knowledge and capacity to deliver DES-DMS, DES-ESS and Ongoing Support, then that provider should be able to provide all these services under one simplified contract.

**Regulation: Reduced**

**A requirement to have only a single contract for a provider delivering DES under both the DES-DMS and DES-ESS services would reduce the regulatory burden on providers.**

We support the proposed simplified single contract arrangements.

**Discussion Point 8: Removing Market Share Restrictions**

1. **What mechanisms should be adopted to ensure universal coverage in an ESA while maintaining a competitive marketplace?**

Vision Australia supports relaxing current restrictions on where and how providers operate. Being able to service clients from outside the ESA supports the principle of choice and enables participants to receive specialist supports and services they need that are not available through generalists.

Capping of market share locks providers out when they reach their cap. This may restrict client choice and access to high performing providers. For Vision Australia, this has led to diminished opportunity for our clients to receiving fit-for-purpose, specialised service and support from Vision Australia including if we exceed our market share.

At present, provider entry is determined by tender process. We prefer a registration process supported by individualised funding in line with the NDIS. This will support consumers to choose their preferred provider, and providers to work harder to attract participants.

Eligibility to provide employment services should include an expanded guaranteed allocation for specialist employment services. There are significant differences in what makes a successful employment placement amongst disability types.

Individuals with blindness and low vision have very unique needs when it comes to accessing employment. For example, independent living, orientation and mobility training and support, and adaptive technology skills are essential tools for success and are generally only available through specialist blindness and low vision service providers who also offer DES. Additionally, people who are blind or have low vision require much greater pre-placement training to develop assistive technology skills to be effective in the workplace.

1. **How should provider diversity be maintained to ensure participants have adequate choice of provider?**

The Australian Government should focus on a broad positive policy outcome that tackles disadvantage and provides effective services to the most vulnerable.

Specialist DES providers should be encouraged to provide specialist services across the whole jurisdiction. The more specialist providers there are operating in conjunction with generalist providers, the more diversity there will be to ensure participants have a broad choice of providers. There should be a higher subsidy payable for work in regional and rural areas.

Vision Australia also supports flexibility for providers to work in partnership with larger employers with a national footprint so the specialist provider’s DES provision is more sustainable and is able to expand operations to meet the needs of employers with greater opportunity for targeting placements and building careers.

Vision Australia calls on Australian Government agencies to lift their performance in relation to employment of people with a disability (just 3.5% of the public sector workforce), and believes there should be greater focus by government agencies to develop programs and Disability Action Plans that specifically reference and target working through DES to source employees.

**Discussion Point 9: ESAs**

1. **Should there be ESAs, if so, how many ESAs should there be?**

We believe there should be ESAs to support service provision to and monitoring of outcomes for local communities, and to ensure program, community and provider accountability. They could be reduced in line with the recent reduction of Job Active ESAs which would mean a reduction from the current 110 DES ESAs to 51.

1. **Should the number of ESAs be reduced if market share is removed?**

Participants should be able to self-refer to anywhere in Australia so they can access the best DES panellist with the most appropriate type of service offering, provided there are appropriate channels available for service delivery.

There should be a higher subsidy for regional and remote ESAs to support DES providers entering the market.

Generally blindness prevalence within the NDIS participant population is between 2-7% based on current NDIS quarterly reports. Provision of specialist services in thin markets including specific disability cohorts is made possible by for-purpose organisations like Vision Australia who are committed to and exist for the benefit of people who are blind.

**Regulation: Reduced**

**Streamlining DES into one program with a single contract and introducing a panel application arrangement will reduce the amount of documentation and time needed to apply to deliver services in a panel application process. Service providers on the panel would need to meet minimum criteria if they wanted to move into another ESA. However, they would only need to provide minimal documentation specific to providing services in that area.**

Vision Australia supports addressing the shortcomings of the current approach. We would prefer that the focus is on building a better system that can provide people with disability the skills and experiences they need to overcome multiple barriers and entrenched disadvantage in gaining and keeping employment. Vision Australia supports participants being able to choose DES providers outside their ESA, and enabling specialists to work across regions to act as the conduit between participants and prospective employers, including large corporations and government agencies.

**Discussion Point 10: Preventing Market Failure**

1. **What specific circumstances should be recognised as market failure warranting intervention?**

Market failure can be identified by a number of, or combination of factors:

* If a participant has no access to an appropriate provider, this would constitute market failure.
* Star ratings reveal the quality of service delivery. Star ratings would provide evidence of sustained lack of performance which could then warrant intervention.
* no suitable jobs available in the area.

1. **If market share is continued in some areas, how should the level of market share be determined?**

Market share should be determined through a consideration of level of unmet need in that area, the ability of a DES panellist to provide services and the level of consumer satisfaction.

1. **What interventions should be used to address market failure and ensure service availability?**

A range of proactive interventions are available including:

* rural and regional areas need specialist DES providers and consideration of subsidies and incentives for these areas.
* Supporting specialist DES who service low incidence disability by enabling delivery into ESAs and service provision remotely, through video and teleconferencing, and through encouragement of partnering with large employers and government agencies to target DES and lift participation.
* Supporting DES providers to target the participant with “Skills for Life” and pre-employment skills approach to build the prospects of the participant, the benefits of which flow through to the DES provider and the DES system more generally.
* Utilising large disability organisations such as Vision Australia in conjunction with the rollout of the NDIS.
* accreditation of specialist providers like Vision Australia

**Discussion Point 11: Ratio between service fees and outcome fees**

1. **What should the ratio between service fees and outcome fees be and why?**

Vision Australia supports a risk adjusted fee at 50/50 ratio because people who are blind or have low vision require a range of specialist and intensive supports to assist in building their capacity. For people who are blind or have low vision, building the prospects of the participant to secure an effective employment outcome involves pre-employment upskilling. Shifting too quickly or too far towards outcome at the expense of service may incentivise some providers to push participants into unsatisfactory or negative arrangements and result in outcomes for participants which are not sustained very far past the minimum thresholds.

Vision Australia strongly supports the focus by the Department on the ultimate success of DES being premised on better outcomes, and lifting the percentage of successful outcomes.

**Discussion Point 12: 4-week and 52-week Outcome Payments**

1. **What should constitute an employment outcome under DES in a modern Australian economy?**

In the end, responsibility for the success or failure of DES will rest with the Australian Government. While the current Australian economy is relatively strong compared to many countries, there is a sustained period of low and no growth and facing a period of uncertainty. This makes it harder to secure outcomes. Also, the increasing casualization of the workforce, and significant underemployment, means there are a range of additional barriers for a person with disability in gaining and sustaining employment.

Vision Australia believes it is essential that participants are provided with “Skills for Life” that will stand them in good stead, now and in the future. These skills are built through exposure to employment experiences, understanding processes and how teams function in a workplace to deliver relevant goods and services. The greatest cost to the economy is borne when a person cannot work. Therefore, DES must balance between providing opportunities to learn and be exposed to opportunities within the workplace, and helping achieve lifelong outcomes. Vision Australia supports long-term employment and economic certainty for an individual, and we think a proposed shift from 26 to 52 week outcomes should be monitored closely including through follow up with participants by the department to gauge the relative benefits of longer term employment with those of gaining experience in an economy that is in transition and subject to disruption.

1. **How should the DES funding model incorporate the growing number of short term jobs available in the economy?**

The casualization of the market could affect outcome fees if there are not sufficient regulations in place to ensure that providers are fairly remunerated for placing a participant in casual work. DES participants should have the opportunity to undertake casual work just as the rest of the community do. If providers are not paid appropriately for placing a participant in a casual role then there is little incentive for them to do so. If a participant is able to secure even a 26 week placement, they will become more employable because of the skills and experience they would gain in this placement.

1. **Should the new model replace the job placement fee with a 4-week outcome payment, and how many 4-week outcome payments should be available for each job seeker?**

Vision Australia doesn’t support a four week outcome payment as the level of support required to place people who are blind or have low vision is generally high. Vision Australia supports the placement fee as it provides immediate payment for the intensive support which will have been delivered to the job seekers for them to have gained work.

We support a 52 week outcome payment in theory however there must be a method of acquiring evidence to prove the 52 week placement that is not over burdensome on the participant or the employer. To request a pay slip, for example, from a participant who has been in work for 52 weeks may prove fruitless as the participant may have exited the service or may not want to engage with their DES provider anymore. We predict that there will be little incentive for participants to provide the required amount of evidence for the department to pay the 52 week outcome fee unless regulations on what is needed to prove a 52 week placement are loosened.

1. **How should job seekers be supported in the period between the 26-week outcome and the 52-week outcome?**

The participant and the provider would have an agreed support plan for the period between the 26-week outcome and the 52-week outcome.

1. **What level of payment should be attached to the 52-week outcome while keeping total DES expenditure within the current funding envelope?**

A DES provider should be given a bonus or incentive for a 52-week outcome that is based on the savings that will be made by the person not re-entering the system in the future. Outcome payments for shorter outcomes could be redirected to the 52-week outcome in order to keep total DES expenditure within the current funding envelope.

**Discussion Point 13: Service Fees**

1. **How should service fees work in the context of a funding model with risk-adjusted outcome fees?**

A risk adjusted funding model must reward providers on the level of difficulty in placing the participant. For example, someone living in a rural area who is blind should attract a higher fee than someone who lives in an inner city suburb and is also blind. There should be facility to invest further in skills training and support for participants to reduce the number of times an individual needs to enter the system and therefore reduce the need for high service fees.

**Discussion Point 14: Pro-rata service and outcome fees**

1. **How should pro-rata service and outcome fees be calculated?**

Vision Australia believes that service fees should follow the participant and be paid pro-rata based on the number of days the participant spends at each provider. There should be consideration of an exit fee.

We support a pro-rata payment for outcomes based on level of assistance delivered by each DES, participant and employer feedback, relative to the period in which the outcome period is calculated.

1. **How should pro-rata fees apply in the event that a provider ceases to be a member of the Panel?**

The fee would be dependent on why that provider left the Panel, and there should be consideration of payment of service fee but not necessarily the outcome fee.

**Regulation: Increased**

**The time required for DES providers to claim fees may increase due to the introduction of the 52-week payment and payments for short-term placements.**

We support the funding being moved in as timely fashion as possible to the new provider as the reasonable and justifiable costs that have accrued in the previous period consistent with approaches being taken in Aged Care (Home Care) and NDIS.

We support the proposed regulation of increased time to claim fees as there is often evidence that needs to be gathered to make a claim.

**Discussion Point 15: Determining Eligibility and Employment Outcomes for ESLs**

1. **Who should be able to qualify under revised assessment criteria for ESL?**

School leavers aged 14 years, 9 months and above and who have a disability, should qualify for ESL.

Vision Australia supports the department’s desire to better target the transition between education and employment and to deliver better support services within the school environment aimed at making school leavers job ready.

There should be a range of initiatives targeting school leavers which DES could assist in strengthening including:

* + School leaver’s program – utilising our relationships with the education and disability sector to target young people in their transition from secondary school to further education or employment. Utilising Karen Wolffe Program (see further below).
  + Bursaries Program. – Funding for specialist equipment to assist people to complete tertiary studies.
  + Graduate Program– initiative employing graduates who are blind or have low vision.
  + Online small business course – developing skills to operate online small business.
  + Live in program at Kensington Victoria – accommodation and intensive training to develop Braille literacy skills needed for employment
  + Commonwealth Bank breakfast – in 2016 we presented at Enable Access Ability Expo in Melbourne and Sydney attended by staff at Commonwealth Bank
  + Addressing Perceptions – we have developed a range of Employer videos to address perceptions some employers have around the needs and capacity of people who are blind or have low vision. <https://www.visionaustralia.org/business-and-professionals/employer-support-and-recruitment-services/employment-case-studies>
  + Karen Wolffe Pre-employment program – running across Vision Australia most recently in regional NSW supporting participants through an intensive course aimed at developing skills for life for work. The Pre-Employment Programme Trainer’s Manual was written by Dr. Karen Wolffe and published in 2011 by the Royal National Institute for the Blind. We offer a small group of people (i.e. 10-12) who are blind or partially sighted a structured learning experience to help prepare for employment.

1. **How could the level of disadvantage and work capacity be assessed for secondary school students?**

A specific and intensive job capacity assessment must be used to determine the level of disadvantage and work capacity of school leavers with disability. This is a crucial time in the lives of these school leavers and the assessment process must be tailored to the specific high needs of this group. We support specialist DES providers undertaking this assessment, rather than Centrelink, as we possess a greater understanding and expertise in relation to disability, and which specialised supports and services augment the capacity of the individual.

**Discussion Point 16: Improving the Gateway**

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

Vision Australia believes that a person who is blind should not be subject to a job capacity assessment as all DSP Blind recipients should receive automatic eligibility.

We support a review of the current assessment process in order to improve the DES Gateway as outlined in the Discussion Paper. Most job seekers with disability access DES through the Department of Human Services where they undertake an initial general assessment. Gateway arrangements must be improved to provide the best service to participants who are not eligible for DSP blind and therefore require assessment. The current process must change for participants who require early intervention and we support a specialist assessment rather than a general assessment. We would support an initial assessment of someone who is blind or vision impaired to be referred and conducted by a specialist DES provider. Finally, we believe all assessors must be trained in disability and at least one assessment must be done in person as it is impossible to assess someone who is blind or has low vision accurately over the phone.

**Discussion Point 17: Assessments Review**

1. **What other aspects of ESAts/JCAs should be examined in the review?**

Vision Australia strongly asserts the assessment process must be reviewed, as assessments by generalist assessors of participants are not adequate for particular disabilities such as blindness or vision impairment. The functional impact of a participant’s level of vision must be assessed by a specialist DES provider. Vision Australia possesses the relevant qualified staff, tools and specialised expertise to do so.

1. **Should there be:**

**a. greater separation of ESAts and provider’s own assessments, with ESAts focused on eligibility, work capacity and appropriate referral within DES and not extending to suggested interventions? OR**

**b. should ESAts be developed and extended to provide more and better information on which providers could base their assistance, with less need to perform their own assessments?**

See response above at Discussion point 17: Question 1.

1. **How should the revised assessment process fit with other options for DES reforms outlined in this Discussion Paper?**

Vision Australia supports any reforms of the assessment process aligning with the general principles of the overall reform of DES including increasing participant choice and control, driving greater competition and contestability of DES and aligning incentives to support better outcomes. This would ensure both participants and providers are working within a more efficient and effective system for job placement.

1. **How should the revised process fit in with other reforms?**

We support reforms to better align with the principles of the NDIS including choice and control.

**Discussion Point 18: Ongoing Support**

1. **Should the fee-for-service funding model specify minimum contacts and hours of support?**

No there should not be minimum hours specified. Hours must be negotiated on a case by case basis.

1. **What minimum servicing requirements should there be for each level of support?**

There should be a monthly minimum servicing requirement for all levels (flexible, medium and high) levels of support delivery.

1. **How should payments be determined for each level of support?**

Payments for each level of support must be determined by the level of support that is being delivered to the participant. For example, High Level support is delivered on a weekly basis and is time consuming so should attract a larger payment than flexible level support which is monthly contact with the participant.

**Discussion Point 19: Job-in-Jeopardy**

1. **How can we better define when someone’s employment is considered to be at risk due to their disability?**

Understanding the main reasons why a participant’s employment is in jeopardy would be enhanced by asking the participants and specialised providers who work with them.

Generally for a person who is blind or has low vision, these reasons can include:

* Lack of assistive technology support at the outset and during employment
* Lack of access to information in preferred format
* Access to transport options
* Orientation and mobility within and around, and to and from, employment
* Fatigue associated with blindness and low vision
* Deteriorating vision loss which may require changes in technology
* Changes to employer computer systems which may create discord with employer specialist software

There should be a facility for participants to self-report if they feel their job is in jeopardy, particularly if they are feeling marginalised in their workplace and/or their hours or duties are reducing.

1. **How can we increase employer awareness of JiJ?**

Vision Australia recommends disability awareness training for employers and other employees which needs to become mandatory and could be included in legislation such as the Fair Work Act. This would become part of an organisation’s Employees Wellbeing Program.

Human Resources departments could be targeted in a marketing campaign to raise awareness about JiJ.

The title of the scheme should be changed as we have found that many providers find the title off putting and negative.

Vision Australia has developed a range of materials that we would be very willing to work with the department to tailor for awareness and education purposes.

Critical to the success of any employer engagement strategy is understanding employer needs and perspectives. What information and support do Employers require? Employers are not looking for formal training in “disability employment” but assistance to build their capacity to support the employment of people with a disability. Even when employers are open to the idea of employing a person with a disability they are not confident that they have the knowledge, understanding or capability to do so.

Disclosure (or lack of disclosure) remains an area of concern to employers but this is reduced if there is trust between employer and employee. The importance of the role of a trusted broker (such as a DES) is paramount to their ability to employ people with a disability.

It is important to note that most research that has been done in relation to disability employment focuses on the “supply” side. That is, most studies focus on what people with disabilities need to do to gain employment with little attention given to the “demand” side, the employer’s perspective. Research by Vision Australia in 2016 reveals that employer attitudes need to be addressed, to address perceptions that:

* the expense of special adjustments and technology is a barrier.
* workplace and system adjustments would be too disruptive.
* a person with vision impairment may be less efficient than other staff.
* 55% of employers have no link between their diversity strategy targets and management performance targets.

Vision Australia’s approach within and beyond DES includes:

* Approaching organisations at an Executive and Senior Management level to increase their awareness, understanding and commitment in employing people with blindness or low vision.
* Taking on an employer brokerage role with targeted employers e.g. Vision Australia corporate partners or other employer networks.
* Increasing opportunities for work experience programs.
* Focusing on training employers and employees to build their capacity to support people with blindness and low vision at work e.g. education on adaptive technology, job design, providing information in accessible formats and Government funding available.
* Reviewing current practices regarding employer disclosure to encourage positive employer-job seeker disclosure discussions that focus on abilities and possibilities not barriers.

1. **Does the current fee structure reflect the services being provided and outcomes being achieved?**

The current fee structure does not reflect the services being provided for Vision Australia clients. A focus overly on cost and efficiency has the potential to harm the DES program and outcomes for participants. Vision Australia would support an incentive for employers to enact a support plan at particular times, including after 52 weeks.

We would also support incentives for an early intervention program that can be accessed through the DES program for jobs in jeopardy clients.

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

We believe a more appropriate name for Jobs In Jeopardy would be The Employment Maintenance Program.

1. **If a JiJ participant chooses not to disclose their disability to an employer, how should providers assist them in the workforce?**

The provider should assist the participant by building the capacity of the individual. If their disability will affect their capacity to do the job then participants are legally obligated to tell the prospective employer.

**6. Should the JiJ service be integrated with Ongoing Support?**

JiJ should not be integrated with Ongoing Support as they are two different programs. A good JiJ program requires assessment and possibly training in use of equipment. Similarly, if someone is receiving Ongoing Support effectively, they would not need the JiJ service.

**Discussion Point 20: Transition Issues**

1. **How can we ensure that DES providers continue to provide quality services to participants towards the end of the current contracts?**

To ensure that DES providers continue to provide quality services, providers must meet their obligations and must be monitored on a regular basis by the department. Additionally, providers who don’t transition to new contracts should be subject to further auditing.

**About Vision Australia**

Vision Australia is the largest provider of services to people who are blind, deafblind, or have low vision in Australia. It was formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families. The service delivery areas include:

* employment
* orientation and mobility
* accessible information (including library services)
* independent living
* assistive technology
* specialist aids and equipment, training and support
* recreation
* Seeing Eye Dogs
* early childhood
* advocacy, and working collaboratively with Government, business and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has gained unrivalled knowledge and experience through constant interaction with our clients and their families, and also through the involvement of people who are blind or have low vision at all levels of the Organisation. In the last 12 months we provided services and supports to more than 26,500 Australians who are blind or have low vision. Vision Australia is therefore well placed to provide advice to governments, business and the community about the challenges faced by people who are blind or have low vision, fully participating in community life.

Vision Australia is a registered My Aged Care, NDIS and DES provider. We have a Client Reference Group with people who are blind or have low vision representing the voice and needs of clients of the Organisation to the Board and Management. Vision Australia is also a significant employer of people who are blind or have low vision, with 14.5% of total staff having a vision impairment.

Vision Australia also has a formal liaison arrangement with Blind Citizens Australia for a number of purposes, including collaboration, so that Vision Australia’s systemic advocacy and public policy positions are, wherever practicable, consistent with the programs and policies of Australia's peak body representing people who are blind or have low vision.