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Comments on the Discussion Paper on the new Disability Employment Service from 2018

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Summary of recommendations

The ambition of Government and for the community generally, should be that more people with disability are in work. The ambition should be bold and aim for a significant shift in the workforce participation rates, not just seeking to make a marginal improvement.

The Australian Chamber has recommended that there should be more fundamental change to the approach to disability employment services than the discussion paper envisages. The Disability Employment Service should be delivered by the same portfolio as the larger Jobactive employment service, being the Department of Employment, offering a single interface to employers. Employer engagement needs to be dramatically improved, and the submission makes a number of recommendations to achieve this.

Should the government not be willing to undertake fundamental change, the Australian Chamber makes recommendations about improving employer engagement within the scope of the current DES program and the proposals made in the discussion paper. It also recommends that the DES reference group be re-established to improve connection between stakeholders and better inform government, and that a PaTH program be designed and delivered for people with disability.

This submission provides the following recommendations:

Recommendation 1: Return DES to the Employment Portfolio

The Disability Employment Service should be delivered through the Department of Employment in order to maximise the opportunity for employer engagement with publicly-funded employment services and the efficiencies of operating it alongside the larger Jobactive service.

Recommendation 2: Better understand the participation rate for DES clients

Improve the understanding of the participation and employment rates for the DES-eligible cohort.

Recommendation 3: Deliver more fundamental change

Fundamental change not just to DES but employment services generally is required to achieve significant improvement in participation and employment rates for people with disability.



Recommendation 4: Implement PaTH for People with Disability

Following the implementation of Youth Jobs PaTH, a PaTH program for people with disability should be established which is linked to vocational training, and has a primary goal of the participant achieving an apprenticeship.

Recommendation 5: Reinstate a DES Reference Group

A reference group for DES involving key provider, employer and client groups should be reestablished.



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1 Introduction

The ambition of Government and for the community generally, should be that more people with disability are in work. The arguments in support of this ambition are many and irrefutable. It is better economically, socially and for the health and wellbeing of the individual. The ambition should be bold and aim for a significant shift in the workforce participation rates, not marginal improvements.

In reviewing the effectiveness and future direction of the dedicated government-funded employment service for people with disability, the Australian Chamber has taken a broader view than what is outlined in the discussion paper. It is acknowledged that the discussion paper has put forward a number of proposals that will improve the operation of the current program. However, if more fundamental change is desired, then fine tuning the existing program, as comfortable as that might be for existing stakeholders, is not sufficient.

The Australian Chamber has demonstrated a commitment to identifying ways to improve employment outcomes for people with disability. This includes many years as the main employer member of the DES Reference Group (disbanded in 2013), as well as issuing a specialist guide to employers *Employ Outside the Box: the business case for employing people with disability* (2013). This guide included recommendations which have not yet been taken up, and much of the comment below is informed by this previous input.

2 DES should not operate in isolation

The discussion paper focuses on the DES program's future without any significant reference to a range of highly influential factors that have an impact on the employment of people with disability, such as how employers currently approach the job market. DES is a relatively small employment service, both in relation to the larger Jobactive program, and even more significantly, in comparison to the labour recruitment market generally.

The discussion paper demonstrates no analysis of this broader recruitment picture. It largely examines the "supply" side – program design – with modest references to employer engagement. Employer engagement is not merely important or even "critical" - it is the **only** mechanism to achieve employment outcomes (notwithstanding the small, but important, opportunities that may arise for self-employment). Identifying the need for greater employer engagement requires consideration of how this can be achieved, both in terms of DES specifically, and for publicly-funded employment programs generally.

As a starting point, it is essential that any employment service focused on servicing people with disability returns to the portfolio that deals with employment. For reasons outlined below (where the shortcomings with the employment services system generally are highlighted) this portfolio shift will not be sufficient to achieve a significant improvement in outcomes. However, it is a logical first step in ensuring that the DES program does not operate in isolation, but works in combination with other engagement strategies being employed in the larger Jobactive and related systems.



Since the shift in portfolio of DES to Social Services in 2013, the Australian Chamber has been consistently calling for its return to Employment. Given that only 5 per cent of the case load of NDIS is likely to be serviced by DES, this insignificant cross over does not match the efficiencies that can be obtained by operating government funded employment services from the same portfolio.¹ If there is any hope at all of improving the number of job vacancies listed, and employer engagement, with the publicly funded systems, it will come through a whole-of-system contact point and interaction, not through small services operating in isolation.

The experience of the Australian Retailers Association who has worked with facilitating employment of people with disability since 2005, says that "while DES is responsive to the needs of individuals with disability to offer support-services for individuals whilst transitioning to employment, its position in the Department of Social Services has limited connectivity with employers. A return of DES to the Department of Employment should focus more attention on the need to improve employment practices and develop clear strategies to address concerns about the costs and risks associated with people with disability as employees in the open workplace."

Recommendation 1: Return DES to the Employment Portfolio

The Disability Employment Service should be delivered through the Department of Employment in order to maximise the opportunity for employer engagement with publicly-funded employment services and the efficiencies of operating it alongside the larger Jobactive service.

3 The challenge is big

Highlighting the difference between the reported ABS participation rate of people aged 15 to 64 with disability (53%) as against those with no reported disability (83%)² understates the challenge facing DES. The participation rates of those with profound / severe limitations, or even moderate activity limitations are, according to the ABS, lower than the participation rate, being 25 per cent and 47 per cent respectively.

The ABS uses a self-declaration basis, whereas DES eligibility relies on the assessment process overseen by Centrelink. Of the 2.1 million Australians that report a disability in the ABS surveys, over 1 million are employed. With the ABS indicating that only 114,000 of those 15-64 yrs with a disability are unemployed, but with a DES case load of 183,000 and a further 200,000³ with a disability in the Job Active case load, there is clearly a definitional misalignment that is creating a confused picture.

¹ Also noting that Jobactive has 200,000 people on its caseload with disability

² ABS (2016) 4430.0 - Disability, Ageing and Carers, Australia: Summary of Findings, 2015

³ If people with a disability are seeking work through DES or Jobactive they should be classified as in the labour force but unemployed unless in the ABS surveys they indicate they are not seeking work.



To add further to the sea of statistics, the discussion paper states that of the 460,000 expected to use the NDIS (which would have a substantial cross over with the profound limitation cohort from the ABS of 722,000), around 24,000 are expected to be DES clients.

The challenge for DES would be more clearly identified if it could be determined what would be the participation rate of those that would, if the opportunity was taken, be assessed as being eligible to be serviced by a DES provider. More specifically, the following should be determined, or at least estimated, based on an analysis of existing data:

- How many Australians of working age (15-64) could potentially meet the assessment requirements for DES?
- Of that DES eligible cohort, how many are in employment, how many are unemployed, and what is the total that would be defined as in the labour force?
- Of those who are employed, how many are in part time employment, and, of that number, how many are underemployed?

It is highly likely that the participation rate of the DES-eligible cohort is significantly less favourable than the ABS rate of 53%. Improving this rate is a big challenge.

Recommendation 2: Better understand the participation rate for DES clients

Improve the understanding of the participation and employment rates for the DES-eligible cohort.

4 Fundamental change is needed

To achieve a substantial improvement in the participation and employment rates of people with disability, fundamental change is needed.

Setting an objective of increased employer engagement is not sufficient. Experience with Jobactive since 2015 has shown that a change in emphasis, and financial reward, to job outcomes, and objectives that have talked about the need for improved "employer engagement" has had no substantial impact on the level of engagement that employers have with that system.

There are two fundamental changes that need to be achieved with both Jobactive and DES:

- Employers need to be **aware** that they can list their jobs and be provided with a readily understood and accessible public system.
- Employers need to be able to **trust** that an employment service or DES provider will provide them with candidates for their consideration that are suitable.

There are a range of barriers that are preventing the achievement of these objectives. Currently, both Jobactive and DES largely rely on achieving placements from a supply side or limited network perspective. They either attempt to place a specific candidate with a close network of employers, regardless of whether there is an existing vacancy, or they operate to seek the listing of vacancies



within a network limited by their own business development activities. Very few employers proactively seek out the system to list their vacancies. Many of our member associations suggest that their employer members have "given up", and that the publicly-funded programs are no longer in the frame of reference for employers when looking at options to find staff.

Fundamental change is needed to better align the publicly-funded employment services with how employers approach the labour market. These changes need to include:

- Work with industry to develop and implement a strategy that aims to significantly improve the participation and employment rate of people with a disability. This strategy should go beyond the program design of DES or even employment services, but be a holistic strategy that examines the customer "cycle of service" from the employer perspective.
- An improved approach to listing jobs from the employer perspective, including a userfriendly registration process.
- Raising the awareness of the option to list vacancies on jobsearch.gov.au⁴ (rather than jobaccess.gov.au) and maximise the job seeker driven outcome where they are attracted to (hopefully) an increased number of vacancies and seek the support of their provider to achieve a job outcome. Employers who list a vacancy should be able to simply select a service where a provider will short list candidates supported by the public system.
- Maximising the opportunity arising from the employers that will be new to the system through engaging with PaTH.
- Better integrating the services of Jobactive and DES to maximise the footprint in the jobs market.
- Encouraging and rewarding collaboration between providers to ensure that the best possible candidates are put forward.
- Encouraging specialisation in providers not just at the client or supply end but at the employer/industry end to improve understanding of the requirements.
- Encourage partnerships between industry groups and providers and the employment services programs generally to improve awareness and understanding and support brokerage arrangements for the long term.
- Consider separating the role of providers to recognise the two distinct client groups employers and job seekers and provide rewards appropriately.
- Consideration of a funding approach that relies less on payments for specific outcomes, but rewards achieving a range of collective outcomes that are currently assessed within the star rating (more on this in the discussion on DES below).
- Continuing to offer well targeted employer incentives and support.
- Encourage improvement in skills of employment service providers in selecting suitable candidates to improve job-matching.

It is recognised that these recommendations, covered here only briefly, go well beyond the discussion paper and the focus on DES. The paper itself acknowledges (page 11) that discussion of other programs is outside its scope. However, the Australian Chamber could not offer specific

⁴ The main Jobactive website is mentioned as it is believed only one web domain address should be advertised to employers. A gateway to jobaccess.gov.au could be opened from the main employer page.



comments on the paper and DES without highlighting the importance of the broader context and possibly pathways to achieve fundamental change.

Recommendation 3: Deliver more fundamental change

Fundamental change, not just to DES but employment services generally, is required to achieve significant improvement in participation and employment rates for people with disability.

5 DES program improvements

This section provides a response to the comments and proposals within the discussion paper. The paper identifies the five primary areas for improving DES (p7), as well as comments about employer engagement. At a minimum, employer engagement needs to be one of the primary areas for improvement, and the fact that it is not identified in this way emphasises the "supply-side" focus of the discussion paper.

5.1 Increasing participant choice and control

The Australian Chamber supports the concepts outlined in the paper. In relation to the participant controlled funding, the discussion paper correctly seeks more evidence of improved outcomes before introducing or expanding this approach. There is no doubt that in relation to many employment opportunities, specialist training (such as responsible service of alcohol or food handling) or equipment is required and funding should be available to the client for this. Whether this should be part of a larger pool of funds to the client requires further evidence of success versus cost.

5.2 Driving greater competition and contestability

In agreeing with this approach, the Australian Chamber is particularly supportive of the relaxation of regional restrictions on where participants can go, as well as making it easier for well-performed providers to expand into new regions. Employers should be serviced by the provider of choice rather than be limited by regions. Providers should be appropriately rewarded with more business and more flexibility for good performance.

Competition is generally a positive driver of good outcomes. However, there should also be encouragement for collaboration. The goal is an employment outcome, and this will be best achieved by ensuring that the employer is provided with the most suitable candidates, which may be clients of other providers.

The Australian Chamber supports reducing the number of regions. Regional barriers in DES do seem to inhibit efficiencies and restrict employer relationships, particularly with larger employers.

5.3 Aligning Incentives to support better outcomes



It is agreed that payments should be proportional to the outcome achieved. Within the context of a fine tuning of the current program, the proposed risk-adjusted funding model looks promising. It is agreed that funding on outcomes should also recognise shifts in jobs that are available. With rapid growth in employment for industries such as retail and hospitality, casual and part time roles are more prevalent.

If more significant reform could be contemplated, a funded model that is less transactional could be considered.

Experience with Jobactive would indicate that a job outcomes payment approach has not been completely successful in changing the culture and practices of providers. Some (particularly smaller) providers have done well in the new environment, others have struggled. In all cases, the system has not generally improved the engagement with employers or collaboration between providers, and employers still find it difficult to receive a reliable service that provides them with suitable candidates for their consideration. As an alternative, it should be considered how the metrics around the star rating systems in these services (which do reward outcomes as well as collaboration and other factors) could be used as the basis for payment for performance. This approach could allow for nuance in payment. Presently, payment on job outcome occurs regardless of the extent of interaction with the client. It is understood that a provider can seek an outcome payment even when one of their clients has obtained a job through their own efforts.

5.4 Improving the gateway and assessment process

A review of the assessment process would seem to be appropriate particularly given its relevance to eligibility for both DES/Jobactive and the disability support pension.

5.5 Assistance in the workplace

This is an important aspect of DES and the services provided to the employer and job seeker should be better understood. During the consultations, it was revealed that the Jobs in Jeopardy (it is agreed a name change is appropriate) program could be used for employees who are not connected to DES who are facing a challenge of disability and the potential impact on their employment. This option for employers to seek assistance is not widely understood, and greater awareness of this option should be achieved through working with industry organisations and workplace relations specialists.

5.6 Employer Engagement

As noted at the outset, employer engagement is not just important but fundamental. Any program changes should recognise that DES has two roles and two clients:

- Job seeker: Preparing and assisting their job seeking clients to be successful in securing a job; and,
- Employer: Engaging with employers, encouraging them to list vacancies and employ people with disability.



The discussion paper puts too much emphasis on the job seeker client relationship and not enough on how to perform the equally-important second role. Even within the narrow scope of the current review, a new DES program needs to:

- Treat the employer relationship with as much care as with the job seeking client:
 - Look at ways to centralise the contact so that the business relationship with the system can be nurtured.
 - Improve the assurance that candidates put forward are suitable, and ensure wherever possible that the employer receives some candidates for consideration.
- Better understand and tailor a service to the needs of industries that are most likely to employ people with disability. The top five industries for employing people with disability are health services, manufacturing, construction, retail and education and training.⁵ Given the size of the workforce and the predicted growth, the accommodation and food service sector should also be seen as a major target. Two examples of what can be undertaken in this area are:
 - o partnerships with the DES program and industry bodies in target industries
 - providers increasing their knowledge and understanding of these sectors and where the job opportunities may be.
- Support broker arrangements with industry bodies where there is a receptiveness to achieve positive outcomes, and commit to funding them for the long term. The brokerage arrangement funded through the NDEI (which concluded in 2014) with the ARA for the retail industry achieved positive outcomes but funding is not sufficiently consistent to maintain the momentum.
- Work with industry as well as the Department of Education and Training and State equivalent departments to identify a workforce development strategy for people with disability, including identifying pathways to an apprenticeship and the highest priority areas for skills development. The current system relies too heavily on individual providers identifying possible training opportunities which may or may not lead to a job.
- Encourage, including some modest funding, local employer advisory groups working with all providers in that region potentially through local chambers of commerce, and identify local employer "champions" who can help improve awareness.
- Retain incentives for employers to hire a person with disability, while recognising that the incentive is only relevant if the job seeker has already been assessed as being suitable and what is needed is to "tip the balance" in favour of hiring.
- Work with the Department of Employment to ensure that employers have one domain being jobsearch.gov.au to list vacancies. Jobaccess.gov.au should be accessed via the single gateway. It is understood that it is already on a single platform due to the previous alignment of services.

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⁵ NDS analysis of ABS data originally quoted in the Australian Chamber's *Employ Outside the Box, the Business Case for employing people with disability*, 2013.



 Encourage greater involvement of employers in work placement while young people with disability are still at school. Both employers and the young people need have a stronger understanding of what is possible. Comments in the paper about greater involvement of DES working with senior school students and improving the transition from education to work are supported.

The discussion paper refers to trials of employer-nominated initiatives. The Australian Chamber looks forward to finding out more about this proposal.

In relation to employer awareness, as long as DES stays isolated from other employment services, it will be difficult to see how a significant impact will be achieved. At a minimum, there needs to be more work done with industry and local employer bodies. Supporting awards programs should not be seen as awareness raising as the profile of such awards is minimal. That said, there are other good reasons to support awards to recognise good relationships and best practice approaches.

Input provided by one of our member organisations, the Australian Retailers Association, who works extensively with disability employment⁶ highlights the need to improve the awareness and understanding of the following:

- Many people with disability want a job but may not be confident to tackle interviews, work
 routines and the work environment. Some employers lack disability confidence or have
 misperceptions that employing someone with a disability is difficult and that they won't be
 able to accommodate someone's particular needs. School preparation, employer
 commitment and flexibility, and getting the right types of support are therefore key
 pathways to moving forward.
- The risk of litigation for employers will not increase if they employ a person with a disability.
- Undertaking best practice, non-discriminatory recruitment practices can ensure all potential applicants, regardless of their disability will feel comfortable and welcome to apply for the positions.
- It is important to ensure recruitment practices are open and accessible to enable people with disability the opportunity to compete on an equal playing field for positions in the open employment market.
- DES can also help employers access a range of other financial support and incentives, such as assistive technology, mental health first aid training and disability and deafness awareness training, Auslan interpreting, and wage subsidies including the Wage Connect Subsidy, Wage Subsidy Scheme and Enhanced Wage Subsidy.
- Promoting of the Employment Assistance Fund as it provides financial assistance for workrelated modifications, equipment and services to help individuals with disability perform their work as independently and productively as possible. The assistance is available to new and existing employees with disability. For employers, the Employment Assistance Fund makes accommodating workers with disability in the workplace easier. It can help

⁶ ARA Retail Institute has trained in excess of 1,200 jobseekers, achieving between 80% - 90% participant completion rate and between 45% – 55% employment outcomes within 12 weeks of the program completion.



cover the costs of modifications to the physical work environment, modifications to work vehicles, adaptive technology, a wide range of information and communication devices, Auslan interpreting and other specialist services for employees with specific learning difficulties or mental health conditions.

• Promoting also the Supported Wage System (SWS) which is a workplace relations mechanism that allows employers to pay a productivity-based wage to eligible people whose work productivity is reduced as a result of disability.

Overall, the discussion paper's commentary on building employer demand demonstrates the limitations of a DES program working in isolation. Unfortunately, the Australian Chamber does not see any ideas in the paper that will make a significant difference in raising employer awareness and engagement.

6 PaTH for People with Disability

The Australian Chamber is a strong supporter of the PaTH youth program announced in the Budget 2016 and due for implementation in April 2017. Although there are still details to be resolved relating to improving ease of use, access, and linkages between the training and placement, the program should result in improving the involvement of employers who have not previously (or recently) engaged with the publicly-funded system.

Even more importantly, the program overcomes one of the most important barriers that employers face when considering the recruitment of a disadvantaged or inexperienced job seeker: risk. Supervising work experience can be time consuming, but it is preferable to commence that relationship as a host rather than an employer (with all its regulatory requirements), particularly with an inexperienced job seeker or one where there is some uncertainty as to how they will "fit" into the workplace.

Once the PaTH program has been launched and tested, the Government should consider enhancing its DES program with a PaTH program for people with disability. In doing so, it would be beneficial to consider the benefit of the original concept put forward by the Australian Chamber which envisaged vocation traineeship type training, rather than just employability training, in order to enhance the prospect of a pathway to a traineeship or apprenticeship.

Recommendation 4: Implement PaTH for People with Disability

Following the implementation of Youth Jobs PaTH, a PaTH program for people with disability should be established which is linked to vocational training, and has a primary goal of the participant achieving an apprenticeship.



7 Reinstate a DES Reference Group

Prior to DES shifting to the Social Services portfolio, there was a reference group, chaired by the responsible departmental Group Manager, of key stakeholders including the Australian Chamber. This reference group provided a valuable opportunity for provider groups, client groups and employer representatives to interact. There is a tendency within employment services for stakeholders, particularly providers, to become very focused on the transactional relationship with the department, and with the design of the program, to the detriment of broader engagement with the labour market and employers.

The reference group provided some regular interaction between stakeholders and resulted in useful advice to the department and how to improve the approach to seeking more employment opportunities for people with disability.

Recommendation 5: Reinstate a DES Reference Group

A reference group for DES involving key provider, employer and client groups should be reestablished.



8 About the Australian Chamber

The Australian Chamber of Commerce and Industry speaks on behalf of Australian business at home and abroad.

Our membership comprises all state and territory chambers of commerce and dozens of national industry associations. Individual businesses also get involved through our Business Leaders Council.

We represent more than 300,000 businesses of all sizes, across all industries and all parts of the country, making us Australia's most representative business organisation.

The Australian Chamber strives to make Australia a great place to do business in order to improve everyone's standard of living.

We seek to create an environment in which businesspeople, employees and independent contractors can achieve their potential as part of a dynamic private sector. We encourage entrepreneurship and innovation to achieve prosperity, economic growth and jobs.

We focus on issues that impact on business, including economics, trade, workplace relations, work health and safety, and employment, education and training.

We advocate for Australian business in public debate and to policy decision-makers, including ministers, shadow ministers, other members of parliament, ministerial policy advisors, public servants, regulators and other national agencies. We also represent Australian business in international forums.

We represent the broad interests of the private sector rather than individual clients or a narrow sectional interest.

9 Employ Outside the Box

In 2012, the Australian Chamber launched an initiative to promote diversity and increased workforce participation. *Employ Outside the Box* is a series of publications to encourage businesses to diversify their workforce. By providing a clear business case and a systematic approach to internal procedures, the guides help businesses to hire people with disability, mature-age workers, Indigenous Australians and other categories of people with skills to offer.

The specialist guide for employing people with disability was launched in 2013.

https://www.acci.asn.au/resources/employ-outside-box-rewards-employing-people-disability



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