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**ABF response to:**

**Department of Social Services Inquiry:**

***Ensuring a strong future for supported employment***

**9 March 2018**

# **About the Australian Blindness Forum**

The Australian Blindness Forum is the peak body representing blindness, low vision and rehabilitation in the blindness sector. ABF was formed in 1992 and is funded only by its members. ABF is an Australian public company limited by guarantee and governed by a Board of Directors.

Membership of ABF is open to any organisation that has as its primary objects the provision of services to people who are blind or vision impaired, or whose activities are substantially connected with the welfare of people who are blind or vision impaired. ABF is represented in every state and territory of Australia.

As Australia’s representative to the World Blind Union, the ABF has strong connections with the international blind and vision impaired community. ABF comprises 15 blindness sector organisations whose expertise and knowledge are reflected in the following comments.

# **Background**

ABF and its member organisations support every person’s right to participate in and contribute to the community. This includes all people who are blind or vision impaired having the right to obtain and retain meaningful employment and live as independently as possible.

This is consistent with:

* the United Nations Convention on the Rights of Persons with Disabilities
* the *Disability Discrimination Act 1992* which prohibits any employer from discriminating against someone on the grounds of disability
* National Disability Strategy 2010-2020 – which contains employment-related commitments.

ABF is concerned that people who are blind or vision impaired are substantially underrepresented in the Australian workforce generally as well as in disability employment programs.

It is estimated that there are over 453,000 people who are blind or vision impaired currently living in Australia and the majority of these are aged over 65 years[[1]](#footnote-1). In 2010, Access Economics projected that the number of people who are vision impaired aged 40 or over will rise to almost 801,000 by 2020 and those who are blind will rise to 102,750.[[2]](#footnote-2).

Research undertaken by Vision Australia indicates that 58% of people who are blind or vision impaired of workforce age are unemployed compared with 14% of the wider population[[3]](#footnote-3).

## **Disability employment programs**

Department of Social Services (DSS) data indicates that as at 31 August 2015, there were 2088 people participating in Disability Employment Services (DES) whose primary disability was identified as vision related. Total caseload for the program as a whole on 31 August 2015 was 173,461. Accordingly, about 1.2 per cent of the DES caseload at that time represented people whose primary disability was vision related[[4]](#footnote-4).

The DSS data also indicated that, overall, and without adjustment for people’s age and other characteristics, people whose primary disability is vision related do worse than the overall outcome for people in DES. In particular:

* 22.7 per cent of people with primarily vison related disability are employed 3 months after their participation compared to 31.1 per cent for all participants
* 49.5 per cent are unemployed compared to 39.3 per cent for all participants.[[5]](#footnote-5)

Given Australia is an ageing population with the retirement age rising, it is also interesting to note that the age group with the most participants was the 55-64 year old age group for both men and women.

These figures demonstrate that people who are blind or vision impaired are suffering employment discrimination and policies and workplace practices need to change in order to address this discrimination.

# **General comments**

ABF appreciates the opportunity to provide a response to the Department of Social Services Inquiry – ‘Ensuring a strong future for supported employment’.

As a general comment, ABF notes the discussion paper states that funding for supported employment for people with disability is transitioning to the National Disability Insurance Scheme (NDIS) and the future landscape of supported employment centres around the full rollout of the NDIS. The discussion paper goes on to say that “the number of people with disability receiving ‘employment supports’ in full scheme NDIS is expected to grow significantly” and that ‘this is good news for people with disability’[[6]](#footnote-6).

ABF is concerned that the discussion paper and any subsequent future policy development makes no mention of those people who fall outside of the NDIS due to being deemed ineligible for the NDIS because their disability is not considered severe enough at that time or because they are over the age of 65. This is not good news for some people with disability.

If you are not eligible for the NDIS you are at a disadvantage. It is not clear from the discussion paper whether the only way to enter supported employment will be as an NDIS participant. Similarly, if someone is a participant in the DES program but it transpires they cannot obtain open employment, it is not clear how they would access supported employment if they are not eligible for the NDIS.

Further, the introduction of the NDIS model generally has meant that disability funding previously provided to disability service providers through block funding has been withdrawn and is being redirected into the NDIS. This will have a huge impact on service providers and other organisations in the disability sector – not only does it affect their livelihood and ability to train and retain specialist staff, it also means that services to people with disability, particularly those who are not eligible for the NDIS, may not be available in the future. Any funding through public donations is also in decline for disability services as the public mistakenly believes the Government is fully funded by the Medicare levy and all people with disability are supported by the NDIS.

The discussion paper makes mention that providers of supported employment will be able to innovate and improve their services. ABF would like to make the general point that existing providers of supported employment have been working hard over many years to deliver good outcomes and opportunities for their employees while at the same time supplying products locally, nationally and internationally.

# **Specific answers to questions**

## **Are there other principles, which should guide the Government’s policy direction for supported employment?**

ABF is of the view that additional principles should also guide the Government’s policy direction for supported employment. These include:

* **Effective employment transition pathways** – supported employment and employee outcomes will be enhanced by effective transitions from school to work; employment to retirement; and supported employment to open employment (and vice versa)
* **Employment outcomes consistent with that of the general working population** – supported employees receive award wages, work average hours per week that will be comparable to general labour market and have access to a wide range of jobs and industries
* **Minimum definition of ‘work’** – work must be defined honestly and reasonably. Sometimes people with disability are receiving day therapy more than they are engaging in work – this delineation between work and day therapy needs to be clear. Currently, 8 hours per week is a minimum benchmark for productive work however, 8 hours per week is not a sufficient benchmark – people with disability and providers need to increase their expectations of a meaningful number of hours of work per week. This should be increased to 15 hours/week in line with the Centrelink test where in order to receive Centrelink benefits you have to meet the activity test requirements of a minimum 15 hours of work per week.

## **What is a ‘good’ participation outcome for a supported employee and how can good outcomes be measured?**

“Good” participation outcomes reflect wider employment outcomes and community expectations like job satisfaction, a decent (living) wage and career opportunities. These outcomes are already (general) labour market measurements. A good outcome can only be measured by a person achieving full employment to the best of their ability and being paid the full award wages or part thereof based on productivity or the industry expectations. Measurement would be employee satisfaction and if the individual achieves their goal of career expectations.

## **What do supported employees most value about working in an ADE?**

ABF members report that job satisfaction, a supportive environment and social interaction (friendships) are frequently cited by supported employees as being most valued in their supported employment workplace. For people with disability, participation in social and economic life within the community and fulfilment within community expectations are most important.

## **Why do most supported employees transition back to supported employment from open employment?**

ABF members report that it is common for supported employees to transition back to supported employment from open employment because of feelings of isolation, loss of friends and a lack of a supportive work environment. As with most people, supported employees wish to be included in the environment where they work or socialise. Most people will return if they are not supported or the work setting is not welcoming or inclusive. The Australian community still has not yet become an inclusive society based on resistance from business to employ in ratio the number of employees with disability to those without disability. If additional support or workplace modifications are required for a potential employee with a disability, a cost-benefit analysis will usually defeat inclusive practices.

## **How can more supported employees be provided the opportunity to choose open employment?**

The concept of supported employment must have a primary goal (and the necessary funding) of being a training and preparation facility to transition people through to open employment if they choose that path. Whilst an ADE is based on commercial practice, elements must be included to ensure training and connection to DES programs provides an income stream to the individual so they can progress. Programs such as internships should be funded as part of the program.

## **Why is participant access to concurrent DES and ADE support services so low?**

ABF believes that participant access to concurrent DES and ADE support services is low because of current government policy settings in welfare (i.e. disability pension). That is, there are currently income disincentives for people to be concurrently accessing DES and ADEs. Many people would fear that they will lose their disability pension, particularly if they move to open employment but they are not sure if they will be able to stay in open employment in the long term. Additionally, if ADEs have a limited commitment to full productivity-based wages and the structure to pay such wages then the incentive is not there for people with disability to participate.

Further, low participation rates are also reflective of a culture in Australia that lacks inclusive practices for the whole community and excludes people with disability. One way to increase participant access to these services is to ensure business sets targets of disability employment, either voluntarily or through legislation.

## **What is the role a supported employer can play in building employee capacity for transition to open employment?**

Supported employers can play a significant role in the areas of work preparation and career planning. However, this requires balance (and possibly incentives) between financial/business viability focus and skill development/learning focus.

Employers generally are seeking new employees with job specific skills and experience but will also want employees to have some general skills or “employability skills” (e.g. communication, teamwork, problem solving, computer literacy, self-management, work ethic, organisational skills, safety awareness) regardless of the industry. A supported employer could build employee capacity for transition to open employment by providing on the job skills development at ADEs and external supported work experience placements with mainstream employers.

Additionally, an ADE could have a training and skills upgrade program in place with continuous improvement linked to their funding rather than just support for an employee. For an ADE, meeting deadlines with contracts can mean they have to overlook training and skills development of supported employees as it is commercially not practical unless separate funding is allocated.

## **What will attract NDIS participants to employment opportunities in the future?**

NDIS participants will be attracted to employment opportunities that offer adequate support, job security, a safe workplace, career and learning opportunities and adequate remuneration.

It is likely that NDIS participants will also only be attracted to employment opportunities if the culture of the community changes and ADEs are perceived as a productive and equal workplace. All employees in the general community seek stimulating and productive work and this desire is not different for people with disability.

## **How are ADEs marketing their services to an expanded market of potential NDIS participants?**

Currently the blindness sector has only one ADE located in South Australia which is operated by The Royal Society for the Blind (RSB). RSB is a not-for-profit organisation providing a broad range of services to Australians who have a severe vision impairment.

Existing clients of RSB have always been offered employment support – either through RSB’s ADE which is an industrial workshop that pays productivity-based award wages, or through RSB’s role as a DES Specialist provider with a 4 out of 5-star rating.

RSB clients have always been given choice and support for their preferred career, with many transitioning through to open employment or further education including university.

## **10. What is the range of NDIS supports that ADEs currently offer?**

RSB provides a full range of services including rehabilitation, training, supportive employment through its ADE and DES services to clients who are blind or vision impaired. These services are all linked to provide a holistic approach to overcoming the impact of vision loss.

**11. What costs would be involved for ADEs that choose to:
a) reform to more open employment models?**

**b) redevelop as service providers offering other NDIS supports?**

### **c) specialise in the provision of employment support as a non-employer?**

As stated in the introduction, given RSB and other blindness agencies have lost block funding under the NDIS model, many services that were offered free of charge to people with disability and supported by government funding, public donations and bequests, are now under threat. Specialist staff and facilities cannot continue to be offered when funding for such services is dependent upon an individual NDIS participant accessing that service with funding from their individual plan.

Further, there are many people who are blind or vision impaired and aged 65 and over (and therefore not eligible for the NDIS) who also rely on blindness agencies to support them but who now have no support due to the block funding model being replaced by the NDIS model. The aged care sector has not integrated disability services or funding sufficiently into aged care sector packages and therefore it is not clear how any employment services would be delivered to people aged 65 and over.

## **12. Should the Government have a role in supporting new market entrants and start-ups in the short-term?**

The Government should have a role in supporting new market entrants and start-ups, however, only where these new entrants are filling a gap in the market for supported employment. For example, as stated above, there is only one ADE in the blindness sector that specialises in sensory loss such as blindness and vision impairment and hearing loss. Ideally, there would be a diagnostic-specific ADE for the sensory sector in each state so that the specialist needs of people who are blind or vision impaired or hearing impaired are supported through an ADE in every state and territory.

Otherwise, ABF is of the view that the Government should direct any support or funding to *existing* ADEs in order to create models that will ensure the following:

* successful transition from school to work
* industrial training including a focus on work ethics and expectations
* provision of an income that is consistent with that of the general working population in Australia
* support choice for participants to transition to open employment with or without ongoing support
* ensure entrants into DES are funded to become “work-ready” and trained with skills to match career goals.

## **13. What investment, or industry adjustment will promote viable expansion in the employer/provider market?**

Some employers may think that there are many challenges and barriers to employing Australians with disability but often this is due to misinformation or myths surrounding such employment.

Businesses need to be educated and assisted to re-design job specifications to accommodate DES participants – this can be done either with a voluntary solution (such as a Code of Conduct) or legislated solution.

Further, education and awareness programs within the community are needed for cultural change and an inclusive environment for all people with disability within Australian society.

ABF would also like to point out that by limiting the supported employment market to NDIS participants, instead of all people in Australia with disability, the Government is, by design, limiting the employment pool. This in turn does not support an expansion in the employer/provider market as this market will be limited to NDIS participants only and does not include non-participants. Governments have a responsibility to all people with disability of working age (now defined as up to 67 years), not just eligible NDIS participants.

## **14. How could employer/providers share learnings of their success and failures within a competitive market?**

Employer/providers need to measure their success by benchmarking employee demographics with the general population in Australia. For example, benchmarks of the overall ADE and DES workforce should be established that are proportional to the numbers of people in these groups in Australian society, including groups based on:

* gender
* people from non-English speaking backgrounds
* people with disability.

Therefore, if 20% of the Australian population has a disability, then 20% of the workforce should also consist of people with a disability.

## **15. How can wage supplementation be better targeted?**

ABF is of the view that there needs to be a link between wage supplementation and employment and learning outcomes. This would ensure people are not just given a placement for the minimum period of time (e.g. 13 weeks) so that the employer can meet its targets. Linking wage supplementation to other outcomes would aim to ensure that the employee is being trained and skilled while at that placement.

## **How can the NDIS enable an employment first approach in planning?**

ABF is concerned that an ‘employment-first’ approach is not appropriate for all NDIS participants in their individual planning process. Employment may not be the first item on the list of someone who is trying to manage a disability in their day-to-day life and therefore this does not necessarily reflect the NDIS principle of choice and control. Some people with disability may need to develop the appropriate knowledge and skills before embarking on a plan for employment. Early intervention in the form of school-to-work transition and employability skills training are keys to future employment outcomes and should be a focus of the NDIS.

Further, the NDIS should not duplicate existing specialist disability services but rather complement them. ABF’s members report that people who are blind or vision impaired and who are seeking employment not only require support to first identify opportunities but also need advocates to dispel myths and explain capabilities, provide training and equipment to integrate into IT systems, provide mobility training to attend the work place and provide awareness training to other staff.

As each disability group has different needs and solutions it is important that existing specialist providers are funded to maintain specialist staff and to ensure realistic career counselling and career selection.

## **How do current assessment processes drive the inclusion of employment supports in an NDIS participant’s plan?**

### **a) Are existing employment assessment processes appropriate for NDIS participants?**

Given it is still early in the roll out of the NDIS across Australia, ABF cannot comment specifically on whether the current assessment processes drive the inclusion of employment supports in an NDIS participant’s plan. However, ABF is concerned that a generic approach by the NDIS across all disabilities is not appropriate – one size does not fit all.

ABF urges the Government to ensure that NDIS participants are referred to a specialist disability employment provider to ensure that the specific needs of that person with their disability are comprehensively assessed and plans developed based on this expertise.

Due to the specialist needs of people who are blind or vision impaired, ABF suggests that ADEs and DES need to be directly linked to ensure programs such as school-to-work solutions (including university and vocational training pathways) are seamlessly integrated into an individual’s career plan.

ABF reiterates that the discussion paper does not include any information about the pathways and options for people with disability who fall *outside* of the NDIS due to ineligibility – this excludes people with a disability that is not yet severe enough to qualify for the NDIS or people who are aged 65 and over. This matter needs to be addressed urgently.

## **Are there different approaches to planning that could be explored for different groups of supported employees (e.g. younger workers, established workers, retirement transition)?**

Again, ABF reiterates the need for the inclusion of and/or referral to specialist diagnostic providers that can provide an individual with a specific disability with specialist advice and support. In particular, NDIS planning must integrate and connect with specialist service providers such as those in the blindness sector for people who are blind or vision impaired. These specialists could then provide further specialist advice for different groups of employees such as younger workers and school leavers.

### **How could SLES better support school leavers to build skills and confidence in order to move from school to employment?**

ABF understands the NDIS School Leaver Employment Support (SLES) is available to NDIS participants who are Year 12 school leavers. The SLES provides up to 2 years of support to a participant after leaving Year 12. ABF suggests that any support for school leavers needs to start much earlier than the end of Year 12 and continue into university. The SLES could better support school leavers, particularly those who are blind or vision impaired by including supports such as the following:

* students who are blind or vision impaired receive the same educational and skill development opportunities as all other students.
* students who are blind or vision impaired are supported in the transition from school to work or university to work. Start career planning when students are in years 10 or 11 and include appropriate work experience or placements like any other student in the education system. Also provide comprehensive career planning assistance to students with blindness or vision impairment throughout their university degrees.
* people who are blind or vision impaired have equal access to tertiary placements.
* information and other material pertinent to education and work is made available in alternative formats.

## **What role could or should an NDIA Local Area Coordinator or planner have in linking participants to an employment opportunity?**

NDIS Local Area Coordinators are generalists and cannot provide specialist advice and support to all people with a variety of disabilities. In the case of people who are blind or vision impaired, LACs would not know the specific capabilities and known limitations of these participants and would not necessarily be aware of all the specific technological supports they might require in the workplace. Further, they would also not know of specific careers already successfully achieved by other people who are blind or vision impaired. Therefore, ABF believes LACs should have a role in linking participants to specialist disability service providers in order to obtain specialist advice about employment opportunities.

As stated in the introduction approximately 58% of people who are blind or vision impaired and of working age are unemployed so it is vital that any supports offered under the NDIS, including those of LACs, are better targeted at specific disabilities.

## **What role could or should NDIA market stewardship have in developing a market with a range of employment, other support, or participation options for existing supported employees?**

NDIA market stewardship should play a role in ensuring that the market for supported employees focuses on a broad range of outcomes, not just increasing manufacturing productivity. In particular, the NDIA market stewardship should focus on social outcomes for supported employees such as training, the development of skills, the gaining of knowledge and pathways into open employment where appropriate.

# **Conclusion**

Supported employment (ADEs) have a very important part to play in assisting people with disability, such as people who are blind or vision impaired.

In particular, ADEs provide an effective interim measure or transition for people who are blind or vision impaired into the workforce including developing skills and a work ethic and understanding common work practices. ADEs also play an important role in transitioning people through the workplaces and into open employment as an interim and flexible learning experience rather than as a form of long term employment, unless the individual chooses to stay in the ADE long term. ADEs can be likened to early intervention services for people transitioning to work.

As already stated, ABF and its members are greatly concerned about the exclusion of some groups of people with disability from the NDIS due to ineligibility because of age or severity of a disability. Now that employment supports are also being rolled into the NDIS, this then also excludes some groups of people from receiving those disability employment supports.

Ironically, those with moderate disabilities are often the ones who successfully use ADEs as a stepping stone to open employment. However, now that supported employment is being rolled into the NDIS, this will mean that those with a moderate disability may not qualify for the NDIS and therefore will miss out on this supported employment pathway.

Further information from the Government is required to advise what pathways into supported employment will be available for those people with disability who are not eligible for the NDIS.

Finally, ABF encourages the Government to ensure all employment programs for people with disability integrate planning and assessment support from specialist service providers so that an optimal outcome for the participant is achieved.

1. Foreman, J., et al, 2016, The National Eye Health Survey Report 2016, The Centre for Eye Research Australia and Vision 2020 Australia, Melbourne [↑](#footnote-ref-1)
2. Vision 2020 Australia by Access Economics Pty Limited, Clear Focus: The Economic Impact of Vision Loss in Australia in 2009, June 2010. [↑](#footnote-ref-2)
3. , Vision Australia, ‘Why you should hire somebody who is blind or has low vision’, <https://www.visionaustralia.org/community/news/28-09-2017/why-you-should-hire-somebody-who-is-blind-or-has-low-vision>, 28 September 2017, accessed on 27 February 2018. [↑](#footnote-ref-3)
4. P.Broadhead, Department of Social Services, pers.comm., 13 October 2015. [↑](#footnote-ref-4)
5. P.Broadhead, Department of Social Services, pers.comm., 13 October 2015. [↑](#footnote-ref-5)
6. Commonwealth of Australia (Department of Social Services), Discussion Paper – Ensuring a strong future for supported employment, December 2017, p.5. [↑](#footnote-ref-6)