

# Response to the Discussion Paper

Ensuring a strong  
future for supported  
employment

## **NDS welcomes the opportunity to respond to the Department of Social Services' discussion paper 'Ensuring a strong future for supported employment' released in November 2017.**

The discussion paper identifies four “foundational principles”:

- An “employment first” approach for all NDIS participants of working age
- A diversity of employers providing employment supports
- Strong and viable Disability Enterprises
- Employees and employers have certainty about industrial wage setting

NDS proposes an additional foundational principle:

- Recognition of supported employment as one of a range of legitimate employment support options for people with disability

There are currently a range of employment options that people with disability are able to access, depending on their individual circumstances. These include supported employment, social firms, supported open employment, open employment and self-employment/micro business. As participant choice enlarges under the NDIS the range of employment options should continue to grow. Supported employment must be a viable and accessible option for people with disability for as long as they continue to choose it.

The data on the participation of people with disability in the labour force is not encouraging. In 2015, 53.4% of working age people with disability (1.1472 million) were in the labour force (52.8%, 1.1636 million in 2012), compared to 83.2% of people with no disability.

Of particular concern is the decline in the proportion of people with severe disability in the workforce. In 2015, 25.0% of people with a profound or severe limitation were in the labour force, down from 29.7% in 2012.

In 2015, the unemployment rate for people with disability was 10.0%; twice that for people without disability at 5.3%. (Source: 2015 SDAC).

In order for these statistics to improve, the opportunities and options for people with disability in both open and supported employment must expand. It is imperative that there be a robust and diverse supported employment sector able to assist a significantly greater number of people with disability to access employment.

The rollout of the NDIS presents an enormous opportunity for supported employment to grow and diversify, but there are significant hurdles to overcome. Currently, too few participants have employment supports in their plans and the path to employment is too difficult.

## Transition to the future landscape

### What is a “good” participation outcome for a supported employee and how can good outcomes be measured?

A good participation outcome for a supported employee would include recognition of aspects of work that are valued by the employee and include both objective and subjective measures. The objective measures could include satisfaction with hours of work (does the employee work as many hours as they would like?) and wage outcomes.

NDS has introduced a simple survey for use by BuyAbility Campaign members, designed to assess how their supported employees value their work. The plain English survey asks employees to express their satisfaction (scored from one to six) in the following six areas:

- I get on well with my workmates
- I have made new friends at work
- My income from work means I can buy more things I need or want
- I like where I work
- I like what I make or do at work
- I can try new jobs and learn new things

The survey was designed with input from supported employers and employees and captures qualitative outcomes rather than relying on simple quantitative measures such as hours of work and rates of pay. We believe it is important that supported employment outcomes reflect the things that supported employees value about their work in a Disability Enterprise. The qualitative outcome data that BuyAbility collects (or similar) could help inform employee or jobseeker choice.

Training and career pathways that allow a participant to have the choice of a range of employment opportunities are also desirable. These may lead to an alternative job in the current place of employment, in another Disability Enterprise, in open employment or in self-employment.

To respond to the diverse preferences and abilities of people with disability, supported employment should evolve to expand the range of employment settings in which Disability Enterprises can support workers with disability. This should include options such as transition-to-work supports, social enterprise models, labour hire and even providing ongoing support to people with disability running a business. The NDIS should have a key role in shaping this ongoing evolution by giving jobseekers and workers enhanced choice and dissolving the prescriptive rules which have governed programs.

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

Supported employees repeatedly state that their jobs are of immense importance in their lives. The messages that supported employees convey about their jobs include:

- Their jobs help define their identity and make them feel part of wider society
- Their jobs give their lives a greater purpose
- They enjoy their work and take great pride in it

- They appreciate the opportunity to learn new skills and try new things
- Disability Enterprises provide them with supports that go beyond employment
- Their workplace is a source of friends and leads to mainstream social activities
- They achieve greater financial independence through the combination of their wages and benefits
- Their general health and wellbeing is significantly enhanced

Many employees make lifelong friends through their supported employment, including meeting their future spouses. Disability Enterprise social clubs often provide opportunities to take holidays, both locally and overseas, something that supported employees may not have been able to do either through their previous social networks or their families. Employees also report that their work enables them to “stay on the straight and narrow”, including falling foul of the law.

Supported employment significantly enhances the lives of people with disability, assists their families and carers and contributes to society more broadly.

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

NDS members report that some supported employees have poor experiences in mainstream employment, including workplace isolation and bullying. When they return to work in a Disability Enterprise it is often because their workforce status is higher in supported employment; the work is more satisfying; they have more friends; and/or their hours in supported employment are greater than in open employment.

Job security in supported employment can be greater than in open employment. Changes in supervisors, financial priorities or HR practices may lead to an employee with disability’s job suddenly being at risk. Some supported employees also indicate that they are no better off financially as a result of moving to open employment.

Additionally, many Disability Enterprises provide a range of supports that are valued by supported employees but not mirrored in open employment. These include support to access Centrelink, assistance to resolve accommodation issues, access to medical assistance etc. This support helps ensure the health, wellbeing and quality of life of a supported employee.

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

A continuum of employment options for people with disability (rather than siloed programs) would help them access the option that best suits them and make a gradual transition to open employment, if that is their wish. These options should range from transition to work, supported employment and social enterprises to self-employment, micro-businesses and open employment. People with disability should be able to receive appropriate support to access these employment options during the course of their working lives.

It is important that trying one option does not close off others, if the option doesn’t work out well for the job seeker. Providing Disability Enterprises with funding and incentives to promote work

experience in open employment and “job tasting” would assist.

Supported employees have been able to participate simultaneously in both Disability Enterprises and DES. Once a suitable placement in open employment is found the employee can choose whether or not to continue employment in the ADE. Currently the policy around NDIS-funded supported employees and concurrent participation with DES is unclear. It is important that simultaneous participation continue to be available.

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

Supported employees are often assessed as being unable to meet the work capacity requirements to access DES, hence their decision to access supported employment. Moreover, many supported employees don't want jobs in mainstream settings and suitable jobs may be in short supply.

ABS data indicates that there are around 271,700 people with intellectual disability, of whom around 66,105 are of working age. Around 15,000 of these people work in supported employment and around 7,600 are supported in work through DES. Of the DES caseload, only 7.4% are people with an intellectual disability. This data indicates that despite some very effective DES providers, people with intellectual disability struggle to access mainstream employment.

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

One of the key roles of a Disability Enterprise is building a supported employee's capacity to work and to gain skills required to function in a workplace. Unfortunately, for many supported employees, the nature of or extent of their disability makes the provision of ongoing support in mainstream settings an unrealistic prospect.

Disability Enterprises are perfectly placed to assist employees to build capacity not only to transition to open employment but to participate more fully in the broader Australian community. Many enterprises already take a whole of life approach when employing a person with disability. A number already offer support to obtain a driver's licence, travel training, access to budgeting, cooking independent living skills, personnel development and gaining community confidence. With access to appropriate funding Disability Enterprises could expand this further to offer “job tasting” and training in pre-employment and other extrinsic skills that assist in finding and keeping a job.

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

NDIS participants will be attracted to employment opportunities if they:

- Can access diverse and interesting jobs or employment opportunities
- Are able to access career development support
- Are provided with support to gain and maintain employment in a range of settings across their working life
- Have access to support funding tailored to their workplace needs
- Have access to quality employment outcomes, including good wages and conditions

Due to the low take-up of employment in NDIS participant plans, there should be a requirement

for people accessing the scheme to consider employment if they are of workforce age and able to work. Generally, if people are not asked to consider employment, they won't, especially if offered non-vocational day supports, regardless of work capacity. NDS recommends that people of workforce age accessing the NDIS should have employment supports identified in their plan as a starting point.

## Strategies to support employer/providers to offer effective employment opportunities

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

In order to market their services, Disability Enterprises build relationships with potential participants through avenues including presentations in schools, post-school expos, liaising with Local Area Coordinators (LACS) and community groups, social media outlets and local radio and television.

Many Disability Enterprises are now collaborating with service providers of School Leaver Employment Supports (SLES) and Transition to Work to provide a seamless transition as young people look toward choosing an employment pathway.

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

Many organisations offering supported employment have continued to offer NDIS supports based on their provision of support prior to the introduction of the scheme. That is, they transferred existing service models (e.g. supported accommodation, day programs) over to the equivalent supports funded through the scheme.

Evidence is now emerging that organisations that previously only provided supported employment have sought to expand their service offerings where there is scope for these to be funded through a supported employee's plan. However, many NDS members have cited difficulties accessing employee's participant plans, which often hampers more seamless provision of supports. We note that since December 2017 NDIS participants can allow their plan to be viewed by service providers.

Disability Enterprises have a vital role in assisting supported employees to develop skills that also enhance their social participation and general quality of life. Examples include relationship counselling, budgeting, making and attending various appointments, managing challenging behaviours and understanding and managing documents.

### What costs would be involved for ADEs that choose to:

#### a) Reform to more open employment models?

Some ADEs already offer an employment model that allows supported employees to work in mainstream settings as part of a work crew or enclave model. This has also sometimes been referred to as "supported open employment".

For organisations operating a more traditional Disability Enterprise a change to a new model would potentially come at a significant cost. Some of the costs likely to be incurred would include:

- Cost of undertaking an environmental scan
- Changes to back office and ICT setup
- Organisational structure changes
- Current and future staffing arrangements
- Potentially higher wages
- Cost of moving to a new business line

Ultimately, the provider would need to make the choice to operate within the DES program, which may also be driven by considerations such as the number of existing DES providers or the state of the local labour market. On a positive note, the DES reforms will enable more supported employment providers the opportunity to enter the DES program.

#### **b) Redevelop as service providers offering other NDIS supports?**

The NDIS requires service providers to embrace a new way of operating. There are costs incurred transforming business practices and investment in expanding service provider capability into new service offerings. Expansion into new markets is a cost of growth and an investment, however the need to redevelop driven by a shift in disability employment policy would require considerable adjustment.

Other costs would include staff, ICT systems, physical infrastructure associated with offering services and attracting participants over the medium to longer terms, short-term pilots to test the attractiveness of offerings, as well as establishing and marketing new service offerings where market forces present opportunity. There could also be costs associated with establishing new company or business structures to address commercial risks and to segregate charitable and non-charitable activities.

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

Some ADEs offer labour hire models, but provision of this type of model is rare and subject to inflexibilities in IR practices that limit the hours of certain types of work crews, for example cleaning crews working outside office hours. NDS considers this “supported open employment” model to be one of the range of specific employment supports for people with disability. Disability Enterprises should be allowed greater scope to support workers through this type of employment model under the NDIS.

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

There may be a case for government intervention to support new market entrants or an expansion of existing providers to new areas or service types if this assists in resolving market failure or gaps in service provision. However, the fundamental rules governing the new NDIS marketplace mean that government should treat providers equally. In general, providers will stand or fall based on their ability to attract participants and should seek to enter the market on the basis of meeting a need.

To allow sufficient market expansion and to ensure equity in service provision, service providers that were not previously funded by DSS as Disability Enterprises, but which operate supported employment models, should have access to similar ongoing support funding, subject to meeting the required quality and safeguard standards. However, the most potential for growth lies with existing providers rather than new providers.

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

Future expansion of the supported employee workforce could mean job opportunities in Disability Enterprises for as many as an additional 100,000 people, a fivefold increase in the existing workforce. However, policy certainty beyond the short-term is needed to stimulate investment and significantly expand the sector's capacity.

The most logical approach to promoting viable expansion in the market is to ensure there is an emphasis on strengthening the viability of existing supported employment providers.

NDS has previously advocated an industry adjustment package for the supported employment sector to both safeguard its long term viability and to ensure that it is able to meet the expected future demand for jobs that should be driven by the NDIS. NDS would recommend the package include access to funds (e.g. interest free loans, 50/50 grants) that would allow changes to business operations and capital expansion, based on the presentation of a sound business case.

Government purchasing can support the employment of people with disability and ensure Disability Enterprises remain strong and viable into the future. Logically, Government departments should boost their purchasing of goods and services from Disability Enterprises and initiatives by Government to help drive these changes across departments are very welcome.

The Department of Social Services has contracted NDS to deliver a range of social procurement initiatives. Funding of \$700,000 (over two years) will build NDS's BuyAbility Procurement service by encouraging government and corporate purchasing from Disability Enterprises.

Increased government procurement from Disability Enterprises constitutes a sound investment that drives the viable expansion of the sector and ensures increased employment of people with disability (in line with stated government policy). In just six years, the BuyAbility Procurement initiative has assisted 62 Disability Enterprises commence work valued in excess of \$26.102M, providing work for 1,270 supported employees. Consequently, NDS recommends that the BuyAbility procurement initiative be funded on an ongoing basis to help achieve these goals.

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

NDS has driven collaborative practice among its membership through many of its membership initiatives, especially the BuyAbility Campaign and its Procurement program. The BuyAbility Campaign is designed for forward-thinking Disability Enterprises committed to best practice in the achievement of quality employment outcomes for people with disability in financially robust commercial settings. The BuyAbility campaign provides the opportunity for Disability Enterprises to share good news and success through a social media platform.



Additionally as part of the BuyAbility Campaign, NDS developed the BuyAbility impact tool. The tool is a unique resource that enables Disability Enterprises to demonstrate their social and economic impact to a range of audiences including potential customers, politicians, policy makers and the broader Australian community. The tool is also an excellent resource for assisting employers to assess their performance against a range of indicators.

NDS is assisting its members through the BuyAbility Campaign to access training and resources that enable them to operate more successfully in a competitive market.

The further development of Communities of Practice within the supported employment sector should also be encouraged. NDS currently operates five Communities of Practice that are designed to assist service providers to transition to the NDIS, through supporting one another and leveraging each other's knowledge and skills.

### How can wage supplementation be better targeted?

There are principles which should apply to targeting wage supplementation. Any wage supplementation should reflect actual cost increases incurred by employers that have resulted due to wage increases driven by industrial relations developments (i.e. the FWC process).

It is essential that the supplementation also reflects business cost shortfalls that arise due to the reduced productive output of supported employees. This concept has been demonstrated by NDS through the "Productive Output Gap" (POG) that explains how the shortfall is calculated. These costs should be funded through DSS.

NDS has previously advocated the introduction of a "social wage" that bundles employee benefits and wages. In addition, there should be some modification of the DSP income test to ensure that employees retain more of their wages following any increase. NDS recommends the extension of the Pensioner Work Bonus to employees with disability receiving the DSP.

In addition, the government should examine what additional costs might be incurred in order to ensure that supported employees are paid the equivalent of the minimum wage. The Social Wage would come near to covering this for fulltime employees, but NDS concedes there are important social policy questions to be considered, including the interaction between wages and benefits, high effective marginal tax rates and ensuring that people with disability in the workforce are consequently less reliant on welfare benefits.

## Strategies to facilitate greater choice and control for NDIS participants.

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

A key principle of the NDIS is that people with disability have the right to an ordinary life, so people with disability accessing the NDIS should be encouraged to work first, and participate in social activities outside of work. The NDIS could send a powerful message that it is committed to an Employment First approach if Ongoing Employment Support is made an NDIS core support, rather than seeing employment support solely as a temporary capacity-building support.

Employment-first policies would ensure that more people with disability were engaged in the labour market. They include access to employment, education, job-driven training and support services that give people with disability the chance to advance their careers.

An employment first approach would result in:

- Increased vocational and work-related supports in NDIS participants' plans
- Enhanced expectations and opportunities for employment
- Better employment outcomes for participants
- A decrease in community participation supports that are likely to become a significantly more expensive ongoing annualised cost
- The NDIS being financially sustainable
- Increased independence of participants

NDS believes that that employment supports should be automatically included within NDIS plans for participants of working age, who could choose to 'opt-out' dependent on their circumstances.

A successful example of this approach is the NDIS WA Transition to Employment pilot where customised employment supports are offered on an automatic basis from year 10. This model places a strong emphasis on customising employment for participants through a heavily-individualised focus, including developing a 'Discovery Record' that showcases competencies and interests and utilises circles of support.

NDS believes that this model should be evaluated and, if the evaluation is favourable, be offered nationally through the NDIS. Elements of the model have recently been recognised by the NDIA as suitable supports for inclusion in SLES.

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

It is now clear that the current work capacity assessment processes (including the ESAt and the JCA) are failing to drive the inclusion of employment supports in NDIS participant plans. That is, there appears to be no link between an individual's assessed work capacity and the inclusion of relevant employment supports that reflect work capacity or the inclination of a participant to seek employment. There is also evidence collected from Disability Enterprises that this is the case for some NDIS participants already in supported employment. It is imperative that this be resolved, as

NDS members have reported unacceptable delays in reviews of participant plans, especially when a participant has a job offer.

NDS recently surveyed its disability enterprise members on the difficulties they were experiencing when seeking employees that could only be funded via the NDIS. 33 organisations responded from six states and territories (including 23 NDIS regions) and the following emerged:

- 26 organisations reported a total of 274 current vacancies in their Disability Enterprises that could only be filled by NDIS participants
- 23 organisations identified a total of 224 potential supported employees unable to gain employment in a Disability Enterprise due to lack of funded employment supports in their plans
- 20 Organisations reported a total of 267 NDIS participant plans for people seeking to access supported employment that did not include relevant employment supports (i.e. ongoing average employment support CBF)
- 20 organisations identified delays in obtaining plan reviews of greater than three months, including 12 that identified a delay of more than four months

Consequently, Disability Enterprises have reported that due to these delays, they have to recruit able-bodied casual labour to meet their business demand. The inability of the assessment process to drive inclusion of employment supports in participant plans is now achieving the opposite outcome to the stated goals of the NDIS.

NDS recommends that where an NDIS participant receives a job offer in a disability enterprise, proof of that job offer should be sufficient to trigger the receipt of ongoing support funding by the employer.

Evidence shows that standardised assessment does not necessarily take into account the individual and their capacity for work in the right employment setting or with job customisation.

Interestingly, it has been found that it is often not the person's disability that affects employment success, but personality traits including a strong sense of self belief, a positive attitude and commitment to the industry and/or the job.

With the right support and the right job, people with significant disability have been able to work above their assessed level. NDS and its members are of the opinion that current assessment mechanisms including the Functional Capacity Assessment (used to determine eligibility for SLES) are not effective in determining employment capacity or appropriate supports.

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

Existing assessment processes do not seem to take into account a participant's desire to work, especially if they have been assessed as having work capacity below eight hours per week. Currently, the options include being referred to a DES, being eligible for transition to work supports (e.g. SLES) or having a participant plan developed for access to the NDIS. The latter is where people with more severe disability and greater barriers to employment participation are likely to end up being excluded from labour force participation.

The assessment process should consider if an NDIS participant could be supported to obtain work through the provision of specific employment supports in their plan.

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

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

SLES should incorporate the type of person-centred approaches successfully trialled by NDS in the WA Customised Employment Project and Ticket to Work. These approaches seek to incorporate individual preference and the power of collaborative networks. In addition, it should be emphasised to school leavers that supported employment is a legitimate career option. It is encouraging to note that NDIS publicity material on SLES has been updated to identify supported employment as one of a number of recognised post-school pathways.

NDS's Ticket to Work model was developed through the synthesis of evidence-based practice from overseas and is currently funded through philanthropic trusts and good will. Ticket to Work has achieved 317 open employment placements in 2016, a better rate than similar state funded transition programs (e.g. NSW TTW achieved 245 open employment placements in 2016).

Elements of the Customised Employment pilot funded through the NDIS and WA "My Way" have also been incorporated into SLES. This model places a strong emphasis on customising employment for participants through a heavily-individualised focus, including developing a 'Discovery Record' that showcases competencies and interests and utilises circles of support.

The transition from school to adulthood is identified as a time of particular vulnerability. Intervention should be directed at preventative, collaborative evidence based approaches that address the multiple causes of exclusion. The connections between the NDIS, employment and the Education and Training sectors (both state and federal) must be strengthened in order to improve school to work transition.

If young people with significant disability do not engage in mainstream employment by age 21, it is unlikely that they ever will. Therefore, it is imperative that employment transition supports be available to school students from Year 10 on.

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

Local Area Coordinators (LAC) and planners should have a key role in emphasising to people of working age seeking to access the NDIS that their plan should incorporate supports that assist the participant to investigate workforce participation.

LACs currently engage in low intensity support coordination. They help people with disability find information and options about support in their local community, such as how to engage with the NDIS and manage their plan as well as inform them about mainstream supports, including employment services.

There should be additional investment in upskilling LACs and planners to more comprehensively assist NDIS participants to access employment supports and the full range of employment assistance options available through the scheme. The interactions between LACs, planners, local

networks and the Information, Linkages and Capacity Building function should be further refined to enhance access to employment options for participants.

LACs and planners would have a key role in the implementation of any “work first” policy adopted for the NDIS. Plan reviews for NDIS participants of working age not in employment should include a prompt that ensures the participant is urged to consider employment, with provision of information that can link the participant with service providers.

### **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?**

The NDIA should provide a market stewardship role that enhances the skills, knowledge and expertise of providers to supply innovative and person centred supports that people with significant disability will need to successfully transition into employment. Interventions should take into account evidence based studies (including longitudinal studies) gathered over several decades of successful support provision in other countries. The NDIA, LACs and the industry need to be equipped with this knowledge when designing and providing employment supports for people with significant disability.

Any market stewardship role should also ensure that all NDIS participants of working age nationally have access to supported employment options. The NDIS identified aspects of this market stewardship role in its Integrated Market, Sector and Workforce Strategy 2015. The strategy identified the provision of a sector development fund, special purchasing arrangements, support for innovative projects, start-ups and maintenance support for providers, as well as encouraging integrated service provision models. NDS recommends that these options be utilised in order to ensure comprehensive provision of supported employment, especially in “thin markets”.

### **Long term pricing and funding arrangements for the provision of supported employment**

In order for the future of supported employment to be secure, a sound long-term pricing and funding model must be introduced that takes into account all of the costs incurred by employers when providing ongoing employment support for people with severe disability.

Consequently, NDS recommends that two funding streams be adopted. The first funding stream would take into account the costs of supported employment provision. This funding would not cover capital costs but would take into account the additional costs that are incurred by an employer when the majority of the workforce has a reduced rate of production output. This “Production Output Gap” is evident when employees with reduced rates of productive output cannot produce goods or services of sufficient value to cover all of the costs incurred employing them. Additionally, this funding stream would include wage supplementation to mitigate the impact of wage increases that might arise from the Fair Work Commission review of the SES Award and changes to wage determination mechanisms. This funding would be paid directly to the Disability Enterprise

The second funding stream would cover the cost of support and would be paid to the individual. The funding should be aligned to the different levels and intensity of support required by each individual employee to perform their job. It should also take into consideration the costs incurred by a Disability Enterprise for the additional costs incurred due to employing a workforce where the majority of people have a disability. This would take into account the additional infrastructure required, maintenance etc.

NDS also recommends access is provided to an Industry Adjustment Fund. This could either take the form of a one off grant and/or an interest free loan. The Fund could be accessed by Disability Enterprises to assist them move to different business lines or restructure their business(es) to operate on a more commercially sound basis.

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**National Disability Services** is the peak industry body for non-government disability services. It represents service providers across Australia in their work to deliver high-quality supports and life opportunities for people with disability. Its Australia-wide membership includes over 1100 non-government organisations which support people with all forms of disability. Its members collectively provide the full range of disability services—from accommodation support, respite and therapy to community access and employment. NDS provides information and networking opportunities to its members and policy advice to State, Territory and Federal governments.

