

14 March 2018

To Whom It May Concern

RE: A Strong Future for Supported Employment

Occupational Therapy Australia (OTA) welcomes this opportunity to provide a submission to the Department of Social Services (DSS) on the subject of disability employment.

Occupational Therapy Australia is the professional association and peak representative body for occupational therapists in Australia. As of December 2017 there were more than 19,500 registered occupational therapists working across the government, non-government, private and community sectors in Australia.

Occupational therapists are allied health professionals whose role is to minimise the functional impairment of their clients to enable them to participate in meaningful and productive activities. Occupational therapists particularly work with people with a disability and their families to maximise outcomes in their life domains including daily living, social and community participation, work, learning and relationships.

Occupational therapists play a key role in supporting people with disability and chronic health conditions to find meaningful employment. It is considered a professional and ethical responsibility of occupational therapists to consider work related issues for all clients.

Occupational therapists are leaders in workplace assessment and the provision of return to work services across a wide breadth of groups. Occupational therapists have a unique role in helping individuals with disability get into work, and helping employers make the necessary changes and adaptations to accommodate individuals with disability in the workplace.

Some of the roles performed by occupational therapists include:

- Providing information about a client's mental state and mental health issues impacting on work performance;
- Exploring interests, vocational histories and experiences, and goals;
- Identifying barriers to employment performance and developing collaborative plans to address these;
- Performing environmental assessments of workplaces;
- Referring to and liaising with employment specialists and clinical teams; and
- Providing education and consultancy to other clinicians in regards to employment services.

OTA's submission focuses on employment support for school leavers who are NDIS participants. There are currently three main employment support options available for school leavers who are approved for NDIS funding:

- SLES – School Leaver Employment Supports, providing individualised funding for a participant (for up to two years after finishing year 12) to help explore options for a mainstream employment pathway.
- DES – Disability Employment Services or supported employment for those with a disability.

- Group based community, social and recreational activities – core funding in a participant’s plan that will enable them to participate in a wide variety of recreational, leisure and developmental activities designed to meet individual needs, build social skills and encourage greater independence.

School Leaver Employment Supports (SLES)

SLES goals include provision of skills and confidence to help the participant move from school to employment.

It offers individualised support for up to two years after finishing year 12 to help participants get ready for work and plan their pathway to employment.

A FAQ document available on the NDIS website states the following with regard to when and where SLES is available:

For students in Victoria, Tasmania, NSW and the ACT potential to benefit from SLES has been informed by the completion of a Functional Capacity Assessment undertaken in the schools. For other areas, and where students missed the school assessment, suitability for SLES is informed through other information including any Centrelink Job Capacity Assessment, (JCA) or Employment Services Assessment (ESAt).

If the Centrelink information is not available, NDIA staff will seek information during the planning conversation to determine the most appropriate transition supports.

Currently, eligibility for SLES funding is determined differently in South Australia, when compared with other regions:

- NSW, Victoria, Tasmania and ACT – Functional Capacity Assessments (FCAs) are conducted by school teachers who receive specialised training in administering the assessment tool by an NDIA Regional Employment Champion.
- SA and other “newly transitioned regions” – currently the SLES Employment Pathway Questionnaire (EPQ) is used instead of the FCA. One member was advised that the EPQ is sent out to participants when necessary (i.e. during their final year of school). However, the NDIS SLES ‘Functional Capacity Assessment & Employment Pathway Questionnaire – Guide for Teachers 2017’ advises of a slightly different process, whereby an online EPQ is carried out by an NDIS Planner or Local Area Coordinator (LAC) on behalf of the student. The purpose of the EPQ is to determine if a Year 12 school leaver would benefit from SLES funding. Completion of the EPQ will help to identify the best pathway for individuals to transition into the workplace, and the degree of support to best suit individual needs.

OTA members have raised concerns about the suitability of some Planners/LACs making recommendations at this important time of transition for young people. Transition into adulthood is a complex time of change for young people with disabilities, and this is recognised as an area of practice that requires skill and experience to navigate with a young person and their family. Without skilled assessment and planning, there is potential for less than optimal use of available funds, unrealistic participant expectations, and supports not being tailored to the needs of young people.

OTA believes that occupational therapists should be engaged to undertake FCAs, as opposed to NDIS Planners and LACs who may not have prior experience working in the health and disability sectors. OTA’s recently published *Occupational Therapy Scope of Practice Framework* advocates strongly for the role of occupational therapists in assessing functional capacity and making appropriate recommendations to enhance

participation in employment. The World Federation of Occupational Therapists (WFOT) has also published the following position statements:

- Statement on Occupational Therapy
- Occupational Therapy in Work-Related Practice
- Occupational Therapy Services in School-Based Practice for Children and Youth

All of these position statements can be downloaded from the Resource Centre on the WFOT's website: <http://www.wfot.org/ResourceCentre.aspx>

Thank you for the opportunity to respond to this consultation. We would be happy to provide further clarification on any of the matters raised in this submission should this be required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rachel Norris', with a stylized flourish at the end.

Rachel Norris
Chief Executive Officer
Occupational Therapy Australia