

14 May 2021

Disability Employment Policy  
By email: [dep@dss.gov.au](mailto:dep@dss.gov.au)

## **Submission – National Disability Employment Strategy**

### **About Illawarra Disability Alliance**

The Illawarra Disability Alliance (IDA) is a group of not for profit disability-specific providers working together collegially and collaboratively to deliver better outcomes for people with disability in the local community.

The IDA welcomes the opportunity to provide a submission in response to the National Disability Employment Strategy Consultation Paper and is supportive of the proposed vision for “An inclusive Australian society where all people have access to meaningful work opportunities”.

The IDA identifies there is more that can be done to remove systemic barriers and increase the participation of people with disability in meaningful work. Employment plays an important role in supporting and improving the lives of people with a disability, their families and their carers. Employment provides economic independence, opportunities for social interaction and a life-enhancing experience which enables people with disability to build friendship groups, develop relationships and participate in the local community.

The IDA strongly suggests that employment must be identified as a goal in NDIS plans. Employment is about more than just earning an income, it is about inclusion. Employment is a target for all people without disability, and should therefore be a target for people living with disability. A key focus at all plan meetings for people over 15 years should be capacity building to develop the skills necessary to secure employment.

The full range of employment options should also be recognised in the National Disability Employment Strategy. There appears to be a strong stigma against supported employment among NDIS planners, leading to school leavers not being offered supported employment as an option. Supported employment plays an important role in the employment context. It enables people with disability to choose the employment option that best suits their needs. It also provides a valuable opportunity for people with disability to participate meaningfully in the workforce, to enjoy the social interaction of the workplace, to develop new skills, and to feel respected, valued and included. Supported employment must be recognised as a valuable, viable and long-term option for people who are unable to enter the open employment market.

The National Disability Employment Strategy must be addressed holistically to achieve the best outcomes for people living with a disability. The IDA herein make a number of key recommendations to remove some of the systemic barriers which limit people with disability from engaging in employment, which ensure that individual support needs are met within a context which provides choice and control, and which also enable employers to create safe and supportive workplaces.

### **Pathways to open employment and mechanisms for ongoing support**

The IDA is encouraged by the consultation paper which highlights the need to build the capacity of employers to overcome barriers to employing people with disability. People with disability can face a range of challenges when participating in everyday life. For many, mental illness and psychosocial issues compound complexities and require different supports including ongoing support in the workplace.

People who are employed by Australian Disability Enterprises (ADEs) value the support and flexibility that these specialist employers can offer. Several IDA members are ADEs and cite case studies of supported employees who have transitioned to open employment, only to find themselves isolated, excluded and unsupported. Many have been disillusioned by the open employment sector and have returned to the ADE. Additionally they have related instances of people with disability who felt undervalued by their employers or colleagues in open employment, which lead to depression or severe stress and anxiety and ultimately a return to the ADE environment. Scenarios such as this act as deterrents for people with disability in considering future open employment options.

Leveraging the existing service infrastructure of ADEs offers one solution to help alleviate some of the concerns and hesitations of employers who may not have experience with employing people with disability. In cases where a person with a disability can be found an open employment position and is at risk of disengaging from open employment, ADE intervention could be provided where necessary, and when required. For example, if an employer in open employment does not have a deep understanding or the confidence to support an employee with disability, staff from an ADE could be engaged to support an accessible and inclusive recruitment, onboarding and ongoing support process.

### Recommendations:

- The IDA encourage the Australian Government to explore innovative employment models based on ADEs which offer realistic, inclusive, sustainable and long-term employment options.
- The IDA recommends employment supports be removed from core supports and repositioned into a social support category with a stronger focus on employment in plans. This will reduce the likelihood of people being diverted from employment supports into day options, and enable more accurate measurement of employment outcomes.
- People with disability should be actively encouraged to participate in decision making around their employment goals. At every plan meeting for a person with disability of employment age, the question should be asked, *how can we, as part of your capacity building see what skills we can help you develop to secure employment in the future?* This should be a discussion which looks at all training and employment options having regard to the wishes of the person with disability before proceeding with other supports.
- Utilise supports offered by ADEs to support an accessible and inclusive recruitment process. Good quality trainers and organisations will make a real difference in keeping people with disabilities (who otherwise may have been supported employees) in long term open employment. A collaborative service provision model between open employers and existing ADEs could not only keep a person with a disability in open employment, but also enable the person with disability to demonstrate the contribution they can make to the workplace, and grow the confidence of employers to hire more people with disability.

### Access to the Disability Support Pension

The Australian Government encourages people with disability to work, and many people with disability want to work. Many people with disability want to take advantage of the benefits gained through participating in the workforce, such as feeling valued and enjoying an increased standard of living. However, a major disincentive for people with disability from moving into open employment is the possibility of losing access to their Disability Support Pension (DSP) and other support entitlements.

Should a person with disability work over the allowable weekly hours of work, they can risk having their DSP suspended. Many people with disability therefore fear that if they suddenly lose their job while in open employment, they will no longer have access to the DSP despite having an ongoing disability. The Disability Support Pension should be permanently available as a safety net for people with ongoing disability or disabilities. Having the assurance of being able to access the DSP would encourage people with disability to explore more employment options, knowing that the safety net is available if needed.

### Recommendations:

- The current rules for people with disabilities which may make them ineligible in future for the DSP must be reviewed. If a person is eligible to be in receipt of the DSP, they should be able to receive the DSP if they are unable to maintain employment and they have an ongoing disability. This will give people with disability the confidence to explore employment options with the safety net of income support.

## Social procurement models

Australian Disability Enterprises report that it has been extremely difficult to win government contracts despite the work being done by NDS through their Buyability Campaign. The IDA calls for a legislative obligation for all levels of government to provide work for people with disability. This will ensure there is energy put into matching the products and/or services the government agency requires with the capabilities of ADE. To give an example, Greenacres Disability Services employs people with disability to produce Body Bags through its social enterprise but has been unsuccessful in gaining a contract with NSW Health, which is a major user of this specialised product. For NSW Health to contract to Greenacres would recognise and build ADE capability and would be import replacement.

### Recommendation:

- A procurement guarantee should be legislated to require all levels of government to have a minimum 1 % spend from their contract budget for ADEs in their jurisdiction, conditional on there being an ADE which is capable and willing to provide the goods and services. Competitive tendering requirements should be removed in these circumstances.

## Reporting and measuring outcomes of the Employment Strategy

The National Disability Employment Strategy should identify key objectives and initiatives to deliver on the vision for the employment strategy.

### Recommendation:

- A roadmap outlining how initiatives will be prioritised and implemented should be made available with clear lines of accountability. Additionally, reporting mechanisms to measure and analyse progress should be transparent and communicated publicly when available.

As identified in the consultation paper, access and inclusion of people with disability in open employment is good for business. By integrating inclusive and accessible work practices, the workplace becomes safer not only for people with disability, but for all other employees, family members and friends of existing employees.

A fundamental objective for most adults is to gain meaningful employment, and this should be no different for people with disability. This ambition is not only driven by a need for income, but to secure financial independence and control over one's life, increase self-esteem, develop relationships, and gain valuable life experience. Many people continuously strive for job satisfaction and fulfilment. This goal should not be limited for a person with disability.

On behalf of the Illawarra Disability Alliance, I would like to thank the Department of Social Services for providing the opportunity to comment on the National Disability Employment Strategy. Should you require further information on any of the points raised in this submission please contact me.

Yours sincerely,

**Nicky Sloan**  
**CEO**  
**Community Industry Group**  
**For and on behalf of The Illawarra Disability Alliance**

Members of the Illawarra Disability Alliance	