

16th May 2021

Forrest Personnel feedback on *National Disability Employment Strategy Consultation Paper*

Thank you for to the invitation to feedback on the *National Disability Employment Strategy Consultation Paper April 2021*, on behalf of Forrest Personnel, Western Australia's largest regional disability employment service provider.

Forrest Personnel is supportive of the intent of the Australian Government to improve disability services and appreciate the opportunity to be involved in this important review. Our feedback is based on over thirty years' experience providing employment services to people with disability and represents feedback direct from jobseekers and from employers.

Forrest Personnel recognises the concerns of the Australian Government and supports work to reduce the unacceptably high unemployment rate for people with disability. We also recognise the challenge of ensuring Disability Employment Services remain sustainable in the future and deliver a cost-effective growth in outcomes for the increasing number of people registered with disability in Australia.

We continue to be committed to supporting the implementation of the National Disability Employment Strategy and are willing to provide further input or in-field testing as the Strategy develops.

Please find below our feedback for your consideration:

Consultation Paper section	Forrest Personnel feedback
<p>Introduction</p> <p>The changing nature of work poses both challenges and opportunities for people with disability. As noted in the 2018 Senate Select Committee report on the Future of Work and Workers, the definition of an employee is changing and nonstandard employment is becoming more prevalent (e.g., gig economy, self--employment-, freelance etc.)¹.</p>	<p>We agree and have direct experience that the current DES programme is quite inflexible when it comes to recognising the changing nature (increasing casualisation) of work and the heavy administrative burden on supporting people into self-employment.</p> <p>It also does not sufficiently recognise the many types of employment outcomes that relate to the gig economy, self-employment, and freelance type work. Please see thoughts at the end of this table for how benchmark hours could be adapted to consider the new reality of work.</p>
<p>Under the Proposed Employment Strategy priority areas:</p> <p>Building employment skills, experience, and confidence of young people with disability: ensuring young people with disability are supported to obtain</p>	<p>We would like to see that this is facilitated by the funding needed to deliver this service. Our main concern is that young people with disability – particularly those with intellectual/learning disability or on the autism spectrum</p>

<p>meaningful work and careers of their choice.</p>	<p>- are still attracting very low levels of DES funding under the current contract.</p>
<p>Improving systems and services for jobseekers and employers: making it simpler for job seekers with disability and employers to navigate and utilise government services and driving better performance from service providers.</p>	<p>We fully support this and would like to see a reduction of red tape, redefinition of what is employment aligned to the changing nature of work leading to a review of benchmark hours (see end of this table) and some non-payable outcomes.</p> <p>We strongly encourage the Government to continue investing in digital systems which integrate across Government Departments and provide opportunities for data sharing with Employment Services Providers.</p> <p>The standardisation of process through digital systems and processes across employment providers will enable visibility of progress and tracking of outcomes more readily, more efficient processes and less administration for Government and employment providers.</p>
<p>Changing community attitudes: changing people’s perception and expectation about the capability of people with disability in the workplace.</p>	<p>We are fully supportive of more effort being put into changing community attitudes, but our experience is that this is a significant, long-term challenge. We recommend that the strategy develops opportunities for funding at the regional and local levels to support local disability employment organisations to develop or support comprehensive social marketing campaigns and community engagement.</p> <p>We believe that education alone is not enough of a lever to drive major, attitudinal change amongst society towards employment for people with disability. Political, economic, social, technological, environmental, and legal change is needed to increase the employment and participation rates for people with disability.</p> <p>There is a role for government in providing real employment opportunities for people with disability as well as providing the legislation necessary to create change. Over 100 countries around the world currently provide for employment quotas in their national legislation. While some countries have had employment quotas for many decades, others have introduced them recently, revised them or are planning to introduce them. There is no standard approach. Quotas vary from country to country in terms of the level of the percentage obligation, the size of company covered, whether they apply to public and private sector employers, how compliance is monitored and what measures apply in the case of non-compliance.</p> <p>We also recommend looking to the experience in other industries such as successful public health campaigns or other ongoing efforts around diversity and inclusion. This</p>

	<p>includes promoting the concept of universal design where the design and composition of any environment can be accessed, understood, and used to the greatest extent by all people regardless of their age, size, ability or disability.</p> <p>Thought is also required to how this will be measured over the long-term.</p>
<p>Early and inclusive career development</p> <p>Research and stakeholder feedback highlighted a number of key concerns around the provision of career development and transition to work activities in schools.</p> <p>Broadly, there is a concern that appropriate career support is not provided early enough for young people with disability, if at all.</p>	<p>We fully support this and have direct experience with the fact that current DES eligibility does not allow for early engagement unless young people are disengaged from school.</p> <p>We highly recommend developing opportunities to engage young people early, along with the families and support networks. Family members often don't consider employment to be part of the future for a young person with a disability.</p> <p>Career development for people with disability is difficult under the current DES programme, but could offer real value to people with disability and the Australian taxpayer. If people with disability are supported to develop their careers and in doing so move into better, higher paying positions, Australian taxpayers could reap the benefit of increased tax revenue and lower government expenditure on welfare payments.</p> <p>Under the current DES programme people who are currently employed are not eligible to join a DES programme with the intention of finding "a better job". Relaxing eligibility conditions to consider working Australians with a disability to find a better job, would also benefit the Australian taxpayer.</p>
<p>Role Models</p> <p>Find ways to challenge assumptions and change attitudes of support networks including parents, carers, teachers, career advisors, disability support workers and medical professionals.</p> <ul style="list-style-type: none"> ○ This could include developing and promoting information, tools and resources to build the capacity and confidence of 	<p>Disability organisations are based locally and having local role models is just as important as national role models. We would like to see mechanisms to help identify and promote role models locally as well as nationally.</p> <p>We would be willing to partner on a pilot scheme for regional role model development.</p>

<p>support networks to assist young people with disability on their employment journey.</p>	
<p>Improving systems and services for jobseekers and employers</p> <p>Support networks such as families and carers, employment service providers, support workers, teachers, career advisors and medical/health professionals, would also benefit from a simpler system, where they can easily access information and resources to support people with disability on their employment journey.</p>	<p>We are fully supportive but recommend paying extra thought to strategies to engage primary health care providers. General Practitioners (GP's) are an important part of the care team for many people with disability. Encouraging work as part of rehabilitation and can play a very influential role in promoting disability employment services.</p> <p>However, in our experience GP's are very time poor and it's very difficult to engage them. Often GP's actively discourage people with disability from seeking work. An approach by the Commonwealth Government to State Government may be valuable in addressing health providers' attitudes to employment as part of people's recovery.</p>
<p>Driving better performance from disability employment service providers</p> <p>The disability employment support system must shift to focus more on jobseekers as individuals, taking into account their strengths, ability, rights, and aspirations.</p> <p>More broadly, the current system does not always provide the holistic support people need in order to be job-ready. It can be difficult for jobseekers to prioritise employment when also trying to meet basic needs such as housing, food and health, and/or dealing with issues of violence and abuse.</p>	<p>We fully support any initiatives to improve the performance of DES providers and service provided to people with disability.</p> <p>The current DES programme doesn't encourage career planning, career development, yet in our experience this is key to enabling job seekers to make the most of their ability. We highly recommend engaging more people with lived experience as well as employment providers such as ourselves to help develop this support.</p> <p>The low rate of JobSeeker payment needs to be addressed as living in poverty is a major barrier to employment.</p>

Other feedback

Incentives in DES

Incentives need to be competitive with those available in mainstream employment services – many employers will take a subsidy of up to \$10,000 available to jobactive participants over \$1,650 available to youth in DES.

What is the definition of work and how can DES adapt?

The ABS defines people as employed if they work an hour or more in the reference week – there are many participants in DES who are able – and do – achieve this measure after participating in DES, however this isn’t considered in the current performance framework.

What is a typical workday – that is how many hours? The current “benchmarks” are out of step with the current nature of work – 8 hours is slightly more than a typical day’s work, 23 hours is more than 3 days per week, but less than 4. “Benchmark hours” are inconsistent with the increasing casualisation of work and the irregular hours that come with it. If benchmark hours have to be retained, it would be more practical for “benchmark hours” to be calculated based on a standard 38 hour working week – see table below:

Current Benchmark	8	15	23	30
Suggested alternative	7	15	22	30

Improved performance measures

I’m pleased to have the opportunity to provide some ideas of performance measures that the Department could consider in developing an alternate to the currently suspended star ratings framework and/or in developing better policy for the future. I’ve listed some measures that I think are both measurable and would be comparable across diverse providers around Australia:

Proposed measure	Benefit to job seeker and Commonwealth Government
Results of National Standards for Disability Services (NSDS) audits – as a measure of quality;	
Participant and employer satisfaction measures, such as net promoter score;	Such measures should be a standard for employment service providers and most providers already have this information available.
A measure of how much closer an individual is to work after participating in DES, than they were at the start of their period of service; Could rely on a participant survey on registration and at periods aligning to DES benchmarks.	A qualitative measure to demonstrate improvements in attitude or job readiness delivered by DES.
A measure of the impact of interventions applied and barriers addressed – the barrier management tool might be one way to measure this.	A qualitative measure to demonstrate improvements in attitude or job readiness delivered by DES.

<p>A measure of the social and economic return to the Australian taxpayer of an individual participating in DES.</p>	<p>For example, an individual with a mental health diagnosis who may have had a number of hospitalisations over a period of years, who after participating in DES has developed coping strategies, social connectedness and participating in work or work-like behaviours – including work experience and voluntary work – who no longer requires regular hospital stays – the health savings could be quantified and used as a measure of the positive outcome from the DES programme and a provider’s service.</p>
<p>The success of a provider in addressing local labour market shortages;</p>	<p>Providers are locally adapted and know local market conditions. Forrest Personnel engages with local industry to support and facilitate improvements in the local job market to help address barriers to the supply and uptake of jobs.</p>
<p>Longevity of jobs beyond 26 weeks;</p>	
<p>How the health of an individual may have improved after participating in DES</p>	<p>There is substantial evidence that employment benefits the mental and overall health and wellbeing of those able to participate in work. A measure in improvements in health, perhaps linked to economic benefits would be a useful measure of return on investment for the Government.</p>

Once again, thank you for the opportunity to be consulted on changes to the National Disability Employment Strategy. Forrest Personnel has over thirty years’ experience supporting people with disability to find and stay in employment throughout Western Australia’s large and diverse regions.

We stand ready to input into and collaborate on any new initiatives supportive of implementation of the Strategy.

Anna Bagshaw

Chief Executive Officer, Forrest Personnel