

Vision Australia submission

National Disability Employment Strategy

To: Commonwealth Department of Social Services

DEP@dss.gov.au

Date: 17 May 2021

Submission approved by: Chris Edwards, Manager Government Relations and Advocacy, NDIS and Aged Care, Vision Australia.

## National Disability Employment Strategy

Vision Australia is pleased to provide this response to the National Disability Employment Strategy consultation paper. Our response highlights the key issues faced by Australians who are blind or have low vision in gaining and maintaining employment. The factors discussed have all been identified before. This emphasises the immediate need for new approaches and ways of thinking to ensure that real and lasting change will occur across all areas of government strategies and policies.

There is some overlap and repetition in our responses to the questions in the Department’s Consultation Paper, but this has been preferred in the interests of clarity and completeness.

# Introduction

Finding and maintaining a job is the most significant challenge facing Australians who are blind or have low vision. For decades, the blind and low vision community has experienced levels of unemployment and under-employment much higher than the average for people with a disability, and therefore many times higher than for the community in general.

While some new job opportunities have been created by technological advances, many traditional jobs have been lost. At the same time, new barriers to employment have been created, and there has been a systemic failure to address existing ones.

The result is that being blind or having low vision in Australia in 2021 all too often entails searching in vain for a job that offers meaningful and rewarding employment. This in turn leads inexorably to low expectations, profound discouragement, loss of self-esteem, and economic hardship.

The solution to the unemployment and under-employment in the blind and low vision community will never be found by doing more of what has been done in the past, which has comprehensively and demonstrably failed. Nor is there a single “magic bullet” policy lever, training program or government intervention that will ensure equal employment opportunities for people who are blind or have low vision.

We strongly believe that new pathways to meaningful employment for people who are blind or have low vision can only be created through the implementation of interconnected and coordinated strategies that are anchored in the family, developed in the school and tertiary education systems, embraced by employers, supported by governments, and embedded in society as a whole. Accordingly, we argue in this response that the new national disability employment strategy must adopt and support this holistic approach.

The strategies we propose are realistic and achievable. In fact, elements of all of them are already evident. In almost all cases where a person who is blind or has low vision is successful in finding and maintaining meaningful and rewarding employment, it is mainly because of a lucky combination of factors. This is currently the exception, but must become the rule.

# Case Studies

The following “what if” scenario illustrates how our whole-of-life, whole-of-society proposals would work together to create equal employment opportunity for someone who is blind or has low vision:

## Emily’s story

*Emily was born totally blind as the result of Leber’s Congenital Amaurosis, a recessive genetic disorder that primarily affects the retina and which can cause various levels of vision impairment, including, as in Emily’s case, total blindness.*

*When her parents received Emily’s diagnosis, the ophthalmologist gave them a brochure about the early childhood services provided by Vision Australia. He strongly encouraged them to be proactive and support Emily as she began the process of developing the skills she would need throughout her life. The ophthalmologist assured them that with these skills, the right supports and the appropriate assistive technology, Emily would grow up to be self-motivated, able to achieve her goals and certain to find a job that would be fulfilling and remunerative.*

*Emily’s parents were encouraged and reassured, and with the support and advice they received from Vision Australia, they became proactive in Emily’s development.*

*By the time Emily started school, she was curious about the world around her, had some basic orientation and mobility skills, and was excited at the prospect of learning braille. Her class and support teachers realised braille was the primary key to literacy for Emily, and her parents encouraged her by arranging for braille labels to be attached to household items such as the microwave oven and salt-and-pepper shakers, and included on birthday cards.*

*They also liaised with teachers and adaptive technology specialists about the most suitable technology for Emily at different stages of her progression through school. They worked closely with her teachers to make sure that Emily was learning the extra skills (known as the Expanded Core Curriculum) that she would need to be independent and well-prepared once she left school.*

*As she grew older, Emily’s parents and teachers encouraged her to start thinking about further study and the kind of job she would like. Emily had a broad range of interests and hobbies by this stage, so she decided that she would apply for university and study for an arts degree to give her the flexibility to explore various subjects before making a decision about her career.*

*In the meantime, the careers advisor at her school arranged some part-time work so Emily could get some work experience in the same way her sighted peers did. The robust adoption of accessible information and communication technology (ICT) procurement policies by all levels of government meant that most computer systems and software used in the private sector were also accessible. It was not difficult to find a local business prepared to give Emily some work experience, so she was able to learn about the basics of workplace expectations and requirements.*

*During her last year of school, Emily’s parents and teachers suggested that she make contact with the disability support staff at a number of universities. When she did, the staff all assured her that the online learning systems and course content would be accessible, and that there would be ample supports if she needed any reasonable adjustments made. They explained to Emily that Australian universities had adopted accessible ICT procurement policies for their online learning systems, and had implemented international accessibility standards in the document formats used for their course content.*

*After Emily’s exam results came out, she received offers from a number of universities. Once she had accepted an offer she used funding from her NDIS plan to arrange for an orientation and mobility instructor to familiarise her with the public transport route from her home to the university.*

*Emily’s university study program included both on-campus and online components. Overall she enjoyed studying at uni and because she did not have to spend time and energy dealing with accessibility barriers, she was able to become involved in campus social life and write for the student newspaper. She found that she had a keen interest in public policy and public interest advocacy.*

*After graduating, Emily decided to study for a Master’s degree. During the semester break, she moved out of home with the encouragement and support of her parents, who wanted her to be independent. Emily found what she called the “Goldilocks apartment – not too far away from mum and dad, but not too close either”. When Emily was at school, her parents had encouraged her to explore the kitchen and cooking and in due course she was able to prepare meals for the family from time to time. Once she was living by herself, cooking was therefore a familiar activity for her.*

*With her Master’s degree completed Emily began to think about employment. She successfully applied for admission to a government workplace graduate program. She already had a good knowledge of word-processing software and was a competent touch typist, so she quickly became a productive member of the team. At the end of the program, Emily applied for a number of jobs in the public service and the private sector and she received several offers to choose from. The work experience she had gained while at school, as well as her participation in the graduate program, greatly helped to put Emily in the best position to secure a job.*

*When Emily started work she had thus already been preparing for most of her life: she had good technology and keyboarding skills, she was comfortable in social situations, and she had high self-esteem and feelings of positive self-worth.*

*Her employer was located in a new building that incorporated a lift system with a touchscreen interface, but there was an “accessibility mode” that included audio output. After a bit of practice Emily was able to use the lifts easily and independently. She was pleased to find that the rooms in the building had tactile and braille numbers on the doors, and it was easy for her to locate particular meeting rooms. There were also a number of Bluetooth beacons strategically placed around the office space. These beacons transmitted information to her smartphone about her current location and how to find other points of interest in the building.*

*The department’s learning management system was accessible as the result of its accessible ICT procurement policy. As a result, Emily was able to participate in professional development activities on an equal basis with her sighted colleagues. After two years working in the department, Emily successfully applied for a more senior role.*

*This required her to relocate to another building in a different suburb. While she had to become familiar with new transport routes, she found the overall accessibility of the new workplace was as good as her previous one. After she obtained JobAccess funding for an updated braille notetaker and some minor workplace modifications she was able to adapt quickly and focus on the requirements of the new role.*

Emily’s story is only a dream to the majority of people who are blind or have low vision in Australia today. In reality, most people who are blind or have low vision will experience many barriers throughout their life, especially during their employment journey.

The following case study provides a good example of some common workplace barriers faced by people who are blind or have low vision. Unlike Emily’s story, this case study is based on the real-life experiences of one of our clients.

## Casey’s story

*Casey is totally blind and was employed by a Commonwealth Government department. The workplace was in a newish building that included automated lifts controlled by a touchscreen panel. No form of non-visual access (such as audio output) had been included as part of the touchscreen interface, so Casey was not able to independently call the lift and direct it to the floor on which her workplace was located.*

*The building management assigned Casey a contact who could assist her to operate the lift, and each time she wanted to use the lift she called this contact’s mobile. However, the contact person was not always available, and Casey sometimes had to wait 10-15 minutes to use the lift. If she was returning from lunch, this meant that either she was late and sanctioned by her employer, or else she had to always cut her lunch break short to allow time for the contact person to arrive at the lift.*

*Casey’s workplace comprised rows of “pods” in which individual desks were housed. To assist Casey to locate the pod where her desk was situated, a large tactile marker was placed on the top edge of the pod and secured with masking tape. The idea was for Casey to trail her hand along the top edge of the pods until she found the tactile marker that indicated her desk. However, other staff regularly placed ornaments or other objects on the top edge of their pods, which Casey would sometimes knock down as she was trailing along the edge to find her desk. While some staff understood what Casey was doing, other staff were less sympathetic to their ornaments being dislodged and, in some cases, broken.*

*With practice Casey was able to memorise the position of her desk in relation to the other pods, but she said that in the meantime she felt embarrassed, isolated and frightened that she would be harassed or bullied.*

*Casey was required to attend meetings in various meeting rooms. When she started her employment there were no braille or tactile signs on any of the meeting room doors, so Casey had to memorise the location of each room in terms of the number of doors from a fixed location. Meeting rooms were in different parts of the building and committing all their locations to memory was not a trivial task. Sometimes Casey miscounted the doors and found herself in the wrong meeting. Naturally, this made her feel anxious and humiliated.*

*To make a bad situation worse, Casey found that the department had failed to implement accessible ICT procurement policies or check the accessibility of its computer systems, and the result was that she was not Able to perform key functions that were part of her role.*

*Casey was unable to retain her employment with the particular department, and several years later, she still feels discouraged, disempowered and disillusioned by her experience.*

There are a number of important observations to make about this real-life workplace experience. Firstly, it shows that workplace barriers are created at different points of the “end to end” experience of employment (from the time the employee leaves home until the time they arrive back again at the end of the day), and are not experienced as isolated, discrete and compartmentalised events but, rather, manifest as a continuous, overlapping and often overwhelming background to daily life. Each experience of being anxious, or humiliated, or embarrassed, or excluded, both amplifies and is amplified by surrounding negative experiences.

Secondly, many of the barriers that Casey experienced were created as the result of systemic failures to protect and promote her rights and needs as a person who is blind, and her need for emotional integrity and mental wellness as a human being in an Australia that should do better. The failures are systemic because, for the most part, Casey’s employer was not responsible for them: her employer had little choice in the selection of building, and they almost certainly would not have been aware that the lift interface would be inaccessible. It is highly likely in fact that the touchscreen-based system was installed by the building management after Casey’s employer had leased space in the building. Nor was it the employer’s fault that the meeting rooms did not have any braille or tactile signage. There is no requirement under the DDA Access to Premises (Buildings) Standards that such signage be included except in very limited situations.

The barriers that most people who are blind or have low vision experience when they try to gain or maintain employment interact with each other in many complex and cascading ways. The end result is that people who are blind or have low vision may give up looking for work altogether as the result of constant discouragement, or else are forced to accept high levels of under-employment.

By contrast, our experience suggests that people who encounter fewer barriers, often through a serendipitous combination of circumstances rather than as the deliberate outcome of policies, programs and interventions, are much more likely to find and maintain meaningful employment.

# Summary of Employment-Related Research

## 2019/20 World Blind Union Employment Survey

In 2019-20 the World Blind Union conducted a major survey to investigate the global employment situation for people who are blind or have low vision. The survey received a total of 2428 responses from people who are blind or have low vision in 85 countries. Country data were organised into three tiers, based on the number of survey responses received. Australia was one of four countries in Tier 1 (along with Spain, Canada, and the US). Australia provided 529 responses to the survey, the highest number of any participating country.

A disturbing finding from the WBU research is that Out of the Tier one countries Australia ranks last in terms of braille usage by people who are blind. There is considerable evidence, both anecdotal and from previous research, that braille literacy and usage can contribute significantly to success in education and in the workplace.

## 2018: International Employment Survey

The most current employment-related research that Vision Australia was involved in was conducted in 2018 through a collaboration with the CNIB Foundation (Canada) and the Blind Foundation of New Zealand. An international survey was conducted to study the employment situation of people who are blind or have low vision.

The survey found that in Australia, only 24% of people who are blind or have low vision are in full-time employment – lower than Canada with 28% and New Zealand with 32%. Of course, even the New Zealand figure, the highest of the three countries involved in the research, is disturbing. The fact that Australia is in last position is a damning indictment of decades of failed policies, programs and interventions at all levels.

The survey also confirmed previous research findings that there is a strong link between levels of post-secondary education and positive employment outcomes. Only 10.6% of respondents without a post-secondary qualification were in full-time employment in Australia, compared with 28% who did have a post-secondary qualification.

## Previous Research

The findings of the 2018 international survey are consistent with those of the previous research that Vision Australia has conducted in 2007 and 2012, and clearly show that the employment situation for people who are blind or have low vision has not improved in the past decade.

## 2007: National Employment Survey

In March 2007, Vision Australia released the findings of the first national survey of employment levels in the blind and low vision community. Based on telephone interviews with almost 2000 clients, the survey found 63% of respondents were unemployed not by their own choice. This was 4.5 times the national average in Australia at the time (14%).

Of those respondents who identified as having a secondary disability (such as a hearing impairment) 82.6% were unemployed.

The 2007 survey also found that 46% of those who were employed were working part-time (compared with the then-national average of 28%), and of those, 13% said they were working part-time because they could not find a full-time job (national average was 6%).

People who were blind or had low vision were twice as likely to be under-employed as the rest of the community.

As noted below, this trend has continued, and in many cases accelerated, since 2007.

## 2012: National Employment Survey

In early 2012, Vision Australia conducted another national employment survey involving telephone interviews with 600 working age clients across Australia.

The key findings from the 2012 research were as follows, noting comparisons with the 2007 survey findings where applicable:

* In 2012, 58% of respondents were unemployed not by their own choice (63% in 2007). Among the wider Australian population the percentage of people who were unemployed not by their own choice was 14%. Thus, people who are blind or have low vision who wanted a job, were four times more likely to be unemployed compared to the general population.
* One third of those who were employed said that they would like to work more hours, highlighting the continuing issue of under employment for people who are blind or have low vision, originally identified in the 2007 survey.
* 75% of respondents with a tertiary qualification were employed, which supports the findings from the 2007 survey showing the strong impact of education in enhancing job opportunities. In 2007 approximately half of the respondents with similar qualifications were employed.

The 2012 survey showed some indicators had improved slightly since 2007 while others had worsened. Overall, however, the 2012 survey provided overwhelming evidence that the blind and low vision community were faced with levels of unemployment that reflected continuing systemic neglect of their basic right to meaningful and rewarding employment.

## 2016: Employer Attitudes Survey

In May 2016, Vision Australia distributed a 14-question employer attitude survey to a cross-section of Australian businesses, with the purpose of examining employer attitudes to recruiting people who are blind or have low vision.

Employer misconceptions about workplace modifications, and preconceived ideas about the kinds of jobs that people who are blind or have low vision can do, had been identified in both the 2007 and 2012 surveys as a significant and increasing barrier to the employment of people who are blind or have low vision.

There were 41 respondents to the survey, representing 21 businesses. The majority of respondents were large companies that employed more than 500 staff. Overall, 90% of respondents employed a person with a disability in their organisation, but the majority identified challenges in employing people with a disability, the two most significant being the allegedly time-consuming process of workplace adjustment, and (inherently) lower productivity of people with a disability.

The majority (83.8%) of respondents had a workplace diversity or inclusion strategy (such a high figure is a positive reflection of the corporate investment of larger companies in workplace diversity), but in 54% of cases, this strategy was not linked to any managerial performance targets. There were no incentives or requirements to implement it and, conversely, there were no negative consequences for failing to do so. There also did not appear to be any evidence of disaggregated disability employment targets that would, for example, require the organisation to employ people with a range of disabilities, including people who are blind or have low vision.

At the same time, employers identified a number of (perceived) barriers to the employment specifically of people who are blind or have low vision, including the expense and disruption of workplace adjustments and the significant expense of acquiring the assistive technology required by the employee.

It is worth noting in this context that 27.3% of respondents said they were unaware of the Job Access program, the Employment Assistance Fund that provides funding to eligible employees with a disability to pay for workplace modifications, assistance and support, as well as equipment. A further 22.6% of respondents did not know technology exists that allows people who are blind or have low vision to be equally productive in the workplace.

Although some individual findings from the 2016 survey are positive and suggest opportunities for awareness-raising among employers about specific issues, the overall picture shows that there are still many barriers created by employer attitudes and lack of awareness.

As we discuss further below, barriers to employment are synergistic rather than discrete. For example, if an employer does not know that relevant assistive technology exists, and if they also (mistakenly) believe an employee who is blind or has low vision is inherently less productive, they are likely to be reluctant to employ such a person, even if they know about the Employment Assistance Fund. The cumulative impact of barriers is thus more than the sum of each barrier considered in isolation.

# Responses to Consultation Paper Questions

## Question 1: Are there barriers or concerns for jobseekers with disability (jobseekers) not covered in this consultation paper?

Two key barriers to employment for people who are blind or have low vision not discussed in the consultation paper are barriers to education, and inaccessible technologies. These are both fundamental components towards securing meaningful employment for a person who is blind or has low vision:

## Barriers to Education

In 2017 Vision Australia conducted research into the barriers to online learning experienced by university students who are blind or have low vision. 34 of the 35 participants in the research said that they had encountered significant accessibility barriers when using the online learning systems that are a key component of university courses.[[1]](#footnote-1)

In some cases these barriers made it extremely difficult for a student to complete their university studies, while in other cases students were forced to discontinue their studies completely.

The three categories of barriers identified by our research are accessibility barriers due to the failure of online learning systems, lack of knowledge about disability and support from many disability staff and unwillingness of lecturers to change the design of course content to improve accessibility.

Given the strong link between attainment of post-secondary education and positive employment outcomes, it is essential that action be taken both by government and the tertiary sector to remove these barriers.

In our submission to the Disability Royal Commission’s 2019 Issues Paper on education, we also highlighted a number of barriers to equal access to education at the school level, especially in relation to braille literacy for students who are blind, and difficulties accessing appropriate assistive technology at different stages as a student progresses through school. We believe that the widespread prevalence of these barriers explains why Australia is ranked last in braille usage, as noted above.

Another barrier related to school education is a lack of attention to the Expanded Core Curriculum (ECC) during the time that children who are blind or have low vision are at school.

The ECC refers to those skills that sighted children acquire naturally through vision (Incidental Visual Learning), but which a child who is blind or has low vision has to learn specifically in order to help compensate for a lack of vision.

These skills are foundational to all other learning. They include orientation and mobility, non-verbal communication and norms for social interaction, skills for independent living, self-advocacy, assistive technology skills and career education specifically tailored to the needs of students who are blind or have low vision[[2]](#footnote-2).

These skills are essential for a person who is blind or has low vision at all stages of life. Many of them can be initiated in the family prior to school age, but a critical time for their development is during the school years. If a person leaves school without these skills, they are more likely to experience difficulty in finding and maintaining employment. In a similar way to many other skills, it will be much harder for a person to learn the ECC skills as part of work preparation later in life.

Our experience working with school-age children who are blind or have low vision is that there is inconsistent understanding and implementation of the ECC by educators in different schools. This means that not all children will leave school equally familiar with them.

A greater national focus on the Expanded Core Curriculum is therefore required by an effective national disability employment strategy, not only to ensure that school leavers are well-equipped for the next stages of life, but also to ensure that they are in the best position possible to find and maintain employment.

For a person who is blind or has low vision, having a firm foundation of ECC skills is a necessary condition for participation in the workforce, but it is not sufficient, because not even the most highly-skilled and firmly-grounded individual can surmount the kinds of systemic barriers that Casey experienced, which are the result of deficient policies and ineffective approaches to access and inclusion.

## Inaccessible systems and processes

The introduction of new technologies has revolutionised many aspects of workplaces over the past 20 years. But little attention has been given to how new and emerging technologies will affect people who are blind or have low vision.

The result is many computer applications and ICT products are not accessible to people who use assistive technology.

All our employment-related research has identified the lack of workplace accessibility as a significant barrier, suggesting that there has been little systemic change in the past decade. For example, 43% of Australian respondents in the 2018 survey ranked this as one of the four main barriers they experienced when seeking or trying to maintain work.

In some cases workplace modifications can make systems more usable, but this is not always possible. For example, we are aware of people who are blind who have been employed by government departments, in some cases in roles that relate specifically to developing programs to assist people with a disability, but who have faced insurmountable barriers because the department’s computer software was not compatible with screen-reading software the blind employee used.

If systems or processes are inaccessible because they do not comply with accessibility standards or guidelines, then no amount of work preparation, skill, or experience on the part of the employee will make those systems accessible and usable. Even if the employer has an exemplary positive attitude to employing someone who is blind or has low vision, they may not be able to overcome a barrier of this kind. In the best case, an employee may be assigned to a different role within the department or organisation, but in the worst case their employment may be terminated.

## Question 2: Are there barriers or concerns for employers not covered in this

## consultation paper?

Often employers will engage with a disability employment service when they wish to recruit a person with a disability. However, many of these services do not have strong connections with the broader disability sector, including people who have post-secondary education or specific professional skills, and the end result can be frustrating for a potential employer who is unable to obtain the employee they are seeking. While there is clearly an opportunity to develop the capacity and scope of disability employment services to cater to a broader range of jobseekers with a disability, it is also important to recognise that mainstream recruitment methods such as online advertising must be made more accessible and usable, especially by people who are blind or have low vision. Please refer to our suggestions in our response in question 3 priority area 1.

## Question 3: Do you have any feedback on the proposed vision or priority areas?

While Vision Australia supports all four priority areas of the strategy, we do not believe that an exclusive focus on these areas alone will be sufficient to create meaningful and sustained change for people who are blind or have low vision in gaining and maintaining employment. In addition to the priority areas, it is vital that there is a commitment from all levels of government, under the leadership of the Commonwealth, to the setting of disaggregated targets for the employment of people with a disability (see our response to Question 6 below). Further, it is essential that there is a whole-of-government commitment to the implementation of standards for accessible ICT procurement to ensure that technologies used in government workplaces are fully accessible. As we have noted previously, even the most highly-skilled and capable person will not be able to gain and maintain employment if the built environment and systems do not accommodate their needs.

## Creating Accessible Workplaces

As we saw in the example of Casey earlier in this response, being unable to independently use the lifts in a building, or being unable to easily locate rooms within a building, can make it very difficult for a person who is blind or has low vision to be effective and productive in the workplace, and to find the experience enjoyable and rewarding. The new disability employment strategy must therefore ensure that greater attention is given to the accessibility of the built environment, in which workplaces are located, as a core component in creating greater employment opportunities.

There is always a regulatory impact analysis done whenever there is a proposed change to an existing disability-related Standard, or introduction of a new one, to assess the effect on business and the community. However, there is never any analysis done to assess the impact of new technologies on people with a disability. For example, the first building lift systems with touchscreen interfaces were introduced at least 10 years ago, but we still, in 2021, do not have an effective standard governing their accessibility for people who are blind or have low vision. The technology was introduced without any consultation with the disability sector, and although some manufacturers have introduced varying levels of accessibility, a significant number of these lift destination control systems are still inaccessible.

The current situation in Australia, where new technology is routinely introduced without any regard for its impact on people with a disability, must be changed. We cannot continue to rely on standards that are slow to develop, even slower to update, and which never keep pace with technological innovation. A more effective mechanism must be found that will operate in parallel with the usual standards process but which will ensure that new technologies used in the built environment will not discriminate against people with a disability.

## Creating Accessible ICT Systems

A key barrier to the employment of people who are blind or low vision is the inaccessibility of many mainstream ICT products and services. For most types of employment, the inability of a person to access an employer’s IT systems will mean an inability to undertake the requirements of the role.

In August 2016, the Commonwealth Government adopted European Standard EN 301 549, relevant to accessibility in ICT procurement (in Australia titled: ‘AS EN 301 549’) (the ICT Standard). The ICT Standard establishes minimum requirements to ensure that websites, software and digital devices are accessible, and provides a framework for the development and procurement of a wide range of accessible ICT products. The ICT Standard has potential to remove some of the most intractable accessibility barriers for the employment of people who are blind or have low vision, but its effectiveness is dependent on it being universally and consistently applied at all levels of public procurement. There is significant inconsistency across the Australian jurisdictions in terms of the adoption and enforcement of the ICT Standard.

Governments are significant users of ICT products and services, and their purchasing decisions and requirements inevitably have a flow-on effect to the private sector. The more that government departments and agencies insist on purchasing only products and services that comply with AS/EN301:549, the more likely it is that accessible products and services will also be adopted by private sector employers, since they will be mainstream default products.

In this area, as in many others, governments have a responsibility to lead by example. If governments do not model through their own actions the behaviours and attitudes they with the rest of the community to adopt, there will be a continuing perpetuation of the long-standing barriers to employment for people who are blind or have low vision.

## Priority Area 1: Lifting employer engagement, capability and demand:

Lifting employer engagement and capability requires the development of a series of practical measures to share knowledge and build employer confidence in recruiting and employing people with disabilities, including people who are blind or have low vision. One such measure that the new disability employment strategy could promote

Is the creation of a national disability support hub that would allow employers to access resources relevant to the employment of people with a disability, and allow jobseekers with a disability to connect with potential employers.

This portal would be established following detailed consultation with peak disability bodies and it could include general information resources on various disabilities, as well as resources specific to the employment of people with a disability. The portal would also allow employers and employees to share “success stories” that would encourage others, and increase the confidence both of employers and employees with a disability.

To help address the difficulty in targeted recruiting of people with a disability that some employers have reported, the portal could also act as a “talent pool”  
for people with a disability to share details of their qualifications and skills. Conversely, to help address the barriers that many people who are blind or have low vision experience when interacting with mainstream recruitment agencies, the portal could also function as an online recruitment platform.

## Priority Area 2: Building employment skills, experience and confidence of young people with disability:

Vision Australia strongly supports greater opportunity for young Australians with disability, including people who are blind or have low vision, to have access to mentoring programs. In addition, it is important that young people have access to careers advice and work experience, and that they be supported to volunteer in the community.

The 2018 international employment survey found that people who are blind or have low vision have a greater chance of success in the employment market if they have previously been in paid employment, had experience volunteering, undertaken leadership development activities, or participated actively in community life. For example, Australian respondents who participated in team-oriented and leadership-building community engagement activities during their school years were up to 2.5 times more likely to be employed full-time.

Mindful of these research findings, Vision Australia has pioneered a number of programs that aim to provide people who are blind or have low vision with leadership skills and work experience that will increase their chances of finding and maintaining employment. Examples of these programs are:

## Vision Australia: LEAP Program

The LEAP (Learn Engage, Act, Perform) leadership program has been specifically designed for young people aged between 14-–18 years. The program seeks to identify our future leaders and to enable them to develop skills that will help them to set and achieve their goals and get the best vocational outcome.

The program has a number of key learning outcomes, including the use of best practice tools to enable participants to clarify their values and highlight their transferrable skills, and the development of job interview techniques and a professional resume.

During the eight-month program, participants are matched with a professional coach best able to assist them achieve their career goals and staff work with participants and their families too set personal goals and shape learning development.

NDIS participants can use their NDIS funding to support their involvement in the LEAP program.

## Vision Australia: Career Start Program

15% of Vision Australia’s staff are blind or have low vision, making us the largest employer of people who are blind or have low vision in Australia.

In addition to our own active recruitment, we also run a philanthropically-funded Career Start program to assist graduates who have a diploma-level or higher qualification and who are blind or have low vision to obtain work experience in a professional workplace before applying for external employment.

Successful applicants for the program are provided with a meaningful 12-month paid (at a level commensurate with the role being performed) workplace opportunity. The intention is that over the 12-month period graduates develop the general skills of how to operate in a professional workplace and put their qualifications into practice.

Graduates spend nine months in a suitable position in Vision Australia, and then generally three months at a placement with an external organisation (with the latter external placement component also funded by Vision Australia).

Beyond the 12-months, support is provided to help graduates leverage their learnings and experience to find external employment. Since its inception in 2015, 21 graduates have been recruited to the Career Start program. Areas of study have included accounting, counselling, communications, information technology, law and marketing. Companies who have provided a three-month placement in the past include Public Transport VIC, ANZ Bank, Seek, BUPA, Channel 31, WISE Employment and Medibank.

Of the 16 graduates who have completed the program, 10 have secured external employment, while four have been employed by Vision Australia following a standard recruitment process.

Vision Australia’s future goal is to connect Career Start with other external graduate programs to increase employment opportunities for job seekers who are blind or have low vision more broadly.

## Priority Area 3: Improving systems and services for jobseekers and employers:

Our employment research suggests that only a small percentage of people who are blind or have low vision use disability employment services outside of those provided by Vision Australia, and a significant percentage of those would not use them again. Our earlier suggestion to create a disability employment hub has the potential to streamline employment services and use accessible recruitment processes, which overall would better support both jobseekers and employers.

## Services

We believe that there are several limitations and flaws in the current disability employment services that are significantly hindering the effectiveness of such services. These include:

* There is no real integration between the NDIS and disability employment services, despite the fact that one of the key goals of the NDIS is to improve vocational outcomes for people with a disability.
* There is little integration between disability employment services and supported employment options, which means that people who are in supported employment do not adequately use these services to assist them to explore possible options for transitioning to open employment.
* Eligibility requirements for receiving assistance from disability employment services are too restrictive. For example, students are ineligible if they are in part-time work, so they cannot build longer-term career options by getting extra work experience.
* People who are already in employment are also ineligible to receive disability employment services.
* Maintaining an appropriate level of expertise to assist people with “low incidence” disabilities such as blindness or low vision can be particularly difficult in these areas, and the quality of service suffers as a result.
* Many of the factors that affect successful employment for people who are blind or have low vision are quite different from other disability groups, and require specific knowledge, experience and networks that are usually not available in generic settings, especially in rural or remote areas.
* The current model for the disability employment services program privileges short-term placements at the expense of more sustainable, longer-term employment outcomes.

## Recruitment Systems and Processes

Many of the systems used by organisations during the recruitment stage are inaccessible for people who are blind or have low vision. This is even the case for those jobseekers who are applying for graduate roles with Government departments.

One of our clients shared their experience:

*‘I applied for a graduate position with a state government department,*

*through the path for people with a disability. After making it past the initial application stage the challenges started rolling in…*

*It was a very long recruitment process with about five stages all up. I made it through to the third stage. Many of the things asked of me were very difficult to negotiate and achieve independently. I found it a little surprising that I had to ask for more time in one of the stages despite having submitted a form that outlined the necessary adjustments I would require as a person who has low vision.*

*Overall the whole process was very stressful and put me off wanting to apply for any similar positions offered by Government departments.”*

## Priority Area 4: Changing community attitudes:

Misconceptions of disability are threaded throughout history and although there have been some changes to how societies think and understand disability, attitudinal barriers are still commonly experienced by people who are blind or have low vision.

Every piece of employment-related research Vision Australia has been involved in has highlighted that negative employer attitudes are identified by people who are blind or have low vision as a significant barrier to employment.

In addition, it is worth mentioning that in the 2018 international research, 60% of respondents in all three countries (Australia, Canada and New Zealand) said that the negative attitudes and false perceptions of employers presented a significant barrier to employment.

While our Employer Attitudes Survey did identify some positive employer attitudes, it also highlighted the glaring gap between employer perceptions and the reality of what people who are blind or have low vision can do and the effectiveness and feasibility of reasonable workplace adjustments.

It is clear that employers need a much greater range of accurate information about the supports available, and how to make their workplaces more accessible and inclusive.

Vision Australia believes that the Commonwealth Government must work with peak industry groups to implement a campaign to raise awareness among employers of the Employment Assistance Fund and the Work Assist program.

## Question 4: Which actions or initiatives would best create positive change for people with disability and employers?

## People with disability

While individuals, families and educators can collaborate to help maximise a person’s “work readiness”, their efforts will be significantly thwarted unless employers, recruitment agencies and governments also take active measures to ensure that workplaces do not create and perpetuate systemic barriers that are beyond the individual’s control or capacity to influence.

Initiatives such as the following will make a significant contribution to the creation of workplaces that are accessible and characterised by equal opportunities for employees who are blind or have low vision:

* Qualified workplace assessors and support personnel readily available who can work with both employers and employees to identify potential barriers and develop reasonable workplace adjustments;
* Strong and demonstrated commitment from governments and peak business groups to adopting a sound policy framework that incorporates elements such as reasonable adjustments, affirmative action, accessible ICT procurement, regular disability-specific training for recruitment managers, and a greater number of targeted recruitment programs similar to Vision Australia’s Career Start program (see our response to Question 8);
* The development of work experience programs that not only provide people who are blind or have low vision with work experience, but also, in the process, help to create a culture of inclusion, diversity and greater understanding in the general workforce and more confidence among employers in the recruitment of employees with a disability; and[[3]](#footnote-3)
* The provision of equitable access to professional development, and targeted positions in leadership programs, to ensure that people who are blind or have low vision have the opportunity for career progression.[[4]](#footnote-4)

## Employers

We recommend that all recruitment agencies, as well as government departments and other employers, take up initiatives such as The Disability Confident Recruiter (DCR). The DCR is an initiative of the Australian Network on Disability[[5]](#footnote-5). It provides tools and resources to assist employers to become more confident in the recruitment of “talented people with disability”.

The program focuses on ways of removing barriers that may exist in the recruitment process and making adjustments to ensure the recruitment experience is a positive one for candidates with disability.

The DCR and similar initiatives are extremely valuable because they not only provide employers with practical information and greater knowledge about how to create inclusive recruitment processes, but they also provide incentives in the form of public acknowledgement and enhanced reputation.

We think it is reasonable to expect that all Commonwealth and state/territory government departments and agencies be required to achieve DCR status as part of their disability inclusion planning or workplace diversity strategies.

## Question 5: How should we report against the Employment Strategy?

Governments at all levels must be required to implement disaggregated targets for employing people with disabilities, and must be held accountable for meeting them. The targets must be disaggregated to ensure that different disability categories, including “low incidence” disabilities such as blindness and low vision, are represented.

Governments must also be required to report their progress in implementing and enforcing compliance with disability standards and guidelines, such as the Web Content Accessibility Guidelines, and the accessible ICT public procurement standard AS/EN301:549.

## Question 6: How do we measure success of the Employment Strategy?

Ultimately, the Strategy will only be successful if more people with a disability are employed in roles that are meaningful and rewarding. No amount of awareness-raising among employers and the community in general will eliminate systemic barriers that are the primary responsibility of government. Governments have a crucial role to play in providing leadership to the private sector before any real success of the strategy can be measured. Governments need to increase the number of people with a disability they recruit, setting the example for other employers to follow.

A primary reason why the problem of unemployment has been so difficult to address is that governments have largely failed to assume this responsibility. For example, it has been generally recognised that, at least in the Commonwealth jurisdiction, the percentage of people with a disability employed in the public service has declined[[6]](#footnote-6). In recent years, improvements in disability employment rates within the Commonwealth Public Service have been materially driven by the inclusive approach of the National Disability Insurance Agency (NDIA), which has achieved encouraging levels of disability employment.

## Conclusion

The COVID-19 pandemic has propelled us to an inflection point that foreshadows a future of many uncertainties and challenges, including a challenging labour market that is likely to make it even more difficult for people with a disability to find and maintain meaningful and rewarding employment.

But there is also a unique opportunity for Australia to take decisive actions now that will result in substantial and long-lasting benefits for people who are blind or have low vision and transform Emily’s story from the stuff of dreams to the substance of reality.

Vision Australia strongly believes that, with the right focus and a comprehensive set of initiatives and measurements of success, the new Disability Employment Strategy can help to

Create pathways to meaningful and rewarding employment for people who are blind or have low vision. As we emphasised in the introduction to this response, such pathways create will require interconnected and coordinated strategies that are anchored in the family, developed in the school and tertiary education systems, embraced by employers, supported by governments, and embedded in society as a whole.

## About Vision Australia

Vision Australia is the largest national provider of services to people who are blind or have low vision in Australia. We are formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision or have a print disability, and their families.

Vision Australia service delivery areas include:

* Registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment;
* Assistive/Adaptive Technology training and support;
* Seeing Eye Dogs;
* National library services, early childhood and education services and Feelix Library for 0-7 year olds;
* Employment services;
* Production of alternate formats;
* Vision Australia Radio network including a national partnership with Radio for the Print Handicapped;
* NSW Spectacles Program; and
* Government advocacy and engagement.

We work collaboratively with governments, businesses and the community to eliminate the barriers our clients face in making life choices and including fully exercising their rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 25,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation.

Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision as well as they support they require to fully participating in community life.

We have a vibrant Client Reference Group, comprising of people with lived experience who are representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.

1. The research report is titled Online But Offtrack: Barriers to online learning experienced by university students who are blind or have low vision. It is available at https://www.visionaustralia.org/community/news/2019-08-23/online-track [↑](#footnote-ref-1)
2. For more detail about the Expanded Core Curriculum, see https://www.perkins.org/school/ecc [↑](#footnote-ref-2)
3. Cf. the discussion of the Australian Network on Disability’s Confident Recruiter program in our response to Question 7 below. [↑](#footnote-ref-3)
4. The 2018 employment survey confirmed that there is currently a lack of such opportunity: the majority of people who are blind or have low vision are employed in entry-level or non-supervisory positions, with only 18% of the Australian respondents saying that they were employed in more senior or supervisory roles. [↑](#footnote-ref-4)
5. See https://www.and.org.au/pages/disability-confident-recruiter.html [↑](#footnote-ref-5)
6. Australian Public Service Commission. 2019. *APS Employment Data 30 June 2019 Release*. [online] Available at: <<https://www.apsc.gov.au/section-3-diversity>> [↑](#footnote-ref-6)