

**WE
LIFE WITHOUT BARRIERS
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Disability Employment Policy
GPO Box 9820
Department of Social Services
CANBERRA ACT 2601

31 May 2021

Dear Sir/Madam

On behalf of Life Without Barriers, please find a submission responding to the Department's National Disability Employment Discussion Paper.

As stated in the submission, Life Without Barriers is committed to addressing this issue, both within our organisation's activities and as a public policy matter.

We trust that the submission is of use to the Department's work.

I ask that you please contact Mr Chris Chippendale, Executive Lead Disability Engagement on 0423 025 035 or at chris.chippendale@lwb.org.au for any further information.

Yours sincerely

A handwritten signature in blue ink that reads "Claire Robbs".

**Claire Robbs
Chief Executive**

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In the spirit of Reconciliation, Life Without Barriers acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Owners and Custodians of this country, and their connection to land, water and community. We pay our respect to them, their cultures and customs, and to Elders both past and present.

**Life Without Barriers Submission:
National Disability Employment Strategy Consultation Paper**

About Life Without Barriers

Life Without Barriers is a charitable organisation supporting approximately 23,000 people in over 400 communities across Australia. We provide people with the services and assistance they need so they can achieve their goals and maximise their opportunities to participate in the community. Life Without Barriers partners with communities, elders, governments and other stakeholders to support people so they can achieve positive long-term change. We offer services to people with disability; children, young people and families; people with mental health needs; refugees and people seeking asylum; and people who are homeless.

Life Without Barriers directly supports around 6,000 people with disability, mostly through the National Disability Insurance Scheme (NDIS). The majority of our disability clients have intellectual disability, and many have high and complex needs.

Life Without Barriers employs over 8,000 staff and is responsible for annual funding of approximately \$700 million. As an organisation that began on forging services for people where they simply did not exist previously, we are deeply committed to assisting people with a disability to have equal access to all the same life choices as people without a disability, with a real focus on employment outcomes.

The right to work, free from discrimination, is a fundamental human right. Individuals who are denied the right to work are denied the independence, dignity, sense of purpose and financial benefits that work brings. The right to work is protected under the International Convention on the Rights of Persons with a Disability.

Life Without Barriers Commitment and Activities

Life Without Barriers provides a number of NDIS services and other provisions that promote employment opportunities for people with disability. This includes:

- specific NDIS school leaver services and skills building supports
- involvement in the ownership of a Disability Employment Service (DES), JobLife.
- a detailed program of activities that is increasing opportunities in our business operations, our Access Inclusion and Employment Plan (AIEP)
- a strong commitment to promoting in our commitment in this area in our public policy advocacy commitments

These activities are cemented as key organisational commitments in our recently released five-year corporate strategy, *Strategy 2025*.

We highlight our two Accessibility and Inclusion Plans below:

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1. Accessibility and Inclusion Plan (AIEP) 2016-2018

Life Without Barriers developed our first AIEP in 2016 with the challenge of creating opportunities in our own organisation. The underlying principle is that we respect and appreciate the differences of our employees and the customers we support, and are enriched by the diversity of their gender, sexual orientation/identity, age, ability, cultural and religious beliefs, perspectives, life experiences and ideologies.

This was coupled with a commitment to appoint people with a disability into meaningful roles within Life Without Barriers. The three areas of focus were:

- i. Ensuring employees and managers are 'disability aware' so that recruitment processes and the workplace encourage the employment of people with a disability.
- ii. Ensuring our premises, digital platforms and vehicles are accessible.
- iii. Providing community leadership to encourage accessibility and inclusion for all.

The major targets of the plan were to make 4% of our new appointments in the first-year people with a disability, increasing to 10 % in the second year.

The result was that we increased our employment of people with a disability and we largely our targets. We also participated in the Access and Inclusion Index Benchmark Report 2016 in conjunction with the Australian Network on Disability¹ along with 21 other organisations.

2. Partnering Towards Inclusion Accessibility, Inclusion and Employment Plan June 2019 to 2022

Our second 2nd AIEP was developed in 2019 to continue to improve Life Without Barriers position as an inclusive employer. We developed new targets of having:

- 8% of new hires people with a disability by 2020
- 10% by 2021 and
- 12% by 2022.

Presently 9% of Life Without Barriers workforce are people with a disability.

Comments on the Consultation Paper

Life Without Barriers agrees with the focus of the discussion paper and strongly supports the priority areas. We note the primacy of the importance of community attitudes in this area we believe that the role of the proposed strategy is to underpin the priority areas with detailed provisions and activities so that a self-sustaining system is established. This 'system' is well displayed in the circular diagram on page 6 and we believe that the community attitudes criterion is the key to 'making the circle go around'.

¹ Australian Network on Disability provides expert advice and services on disability to employers, Government representatives and industry bodies. See: <https://www.and.org.au/>

Issues for Consideration:

- Community attitudes often set low expectations for people with disability and this can lead people with disability to internalise these expectations. Therefore, the strategy needs to focus on community education and empowerment for people with disability.
- To this end, Life Without Barriers strongly supports the work of the Attitude Foundation². This and similar organisations provide vehicles for people with disability to portray themselves in a realistic way.
- While supporting the strategy’s focus on younger people, specific provisions should also be considered across age cohorts, with attention given to the circumstances of people aged 30 and older.
- The paper rightly notes the silos and lack of connectedness between Job Active, DES, NDIA and other systems. People with disability as well as providers find this situation confusing and frustrating. We believe that the service provider sector can have a leading role in assisting with new provisions to address this situation.
- It is proposed that further work be undertaken to support the strategy on the issue of asking people to disclose their disability at the time of hiring or later. While disclosure is obviously necessary to assist individuals and with policy and wider provisions in terms of collecting numbers and information, it is an intensively personal matter.
- This work should also look at definitions of disability as this can be both confusing and can lead to feelings of stigma. There is also a range of disability ‘types’ and individual support needs can vary widely. Therefore, special attention needs to be given to this issue.
- Related to definitions and disclosure is the use of targets for employment. Again, while this is subject to debate, Life Without Barriers believes that at this stage of addressing this issue, targets, applied sensitively and carefully, can be an important and positive tool.
- Employer (and colleague) attitudes are also vitally important. People with disability are often seen as people who need assistance and not viewed as colleagues or co-workers. We believe that this issue, defined as ‘benevolence bias’ needs to be addressed.
- Successfully addressing the issue of facilitating more employment options requires strong leadership commitment. For employer organisations, this means visible and genuine commitment from executives and boards. Life Without Barriers recommends the development of specific tools and provisions similar to our Access Inclusion and Employment Plans.
- We also recommend the establishment of Disability Employee Networks as a key way of engaging staff with disability who can support this organisational commitment with practical measures and suggestions.
- In respect of measuring outcomes of the strategy, in addition to processes to measure employment numbers and statistics, consideration could be given to provisions such as number of organisations achieving accreditation of “Disability Confident Recruiter (DCR)” status (this is a provision of Australian Network on Disability).

² Attitude Foundation: <https://www.attitude.org.au/>

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- Measurement should also consider transformative change, not short-term numbers. This means that the strategy must look at long term changes and consider employment retention, career opportunities and not just job placement numbers. These issues are current matters for improvement in existing DES and other systems.
- Subjective measures, such as self-reported outcomes and feelings of people with disability themselves should also be considered.
- In respect of reporting progress and outcomes, it is suggested that an annual statement to Parliament is considered. However, such a statement should be reported as an overall economic and employment issue, not a 'welfare' issue. To this end, the parliamentary reporting could be undertaken by an economic/employment agency and Minister, not by the 'disability' Minister.

Life Without Barriers appreciates the opportunity to provide a response to the strategy. We welcome any opportunity to assist with its further development and implementation.