

Response to Disability Employment Support program consultation

# January 2022

**Who we are:**

Better Access Australia is a not-for-profit organisation striving for improvements in health, disability, and social services to achieve better access and continuity of care for all Australians by 2030.

Better Access Australia contributes to the public policy debate in Australia through research, publications, public discussion and advocacy. We recognise that Australia’s health, disability and social services systems (the social sector) work best when all parties, public, private and not-for-profit, engage in good faith with the existing systems and processes, and that each party’s contribution is recognised and valued. We partner with consumers, peak bodies, industry, and academia to identify and promote better outcomes in Australia’s social sector.

We believe that the foundations of Australia’s social sector are solid and deliver reasonable quality services to most Australians. However, there are significant challenges and opportunities in the short term and over the longer term horizon, and Australia’s governments, industry and not-for-profit sectors need quality advice and strong advocacy if they are to be responsive and agile in addressing the policy implementation reforms necessary to keep pace or surpass international best practice by 2030.

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**BETTER HEALTH, DISABILITY AND SOCIAL SERVICES**

Thank you for the opportunity to contribute to the public consultation process on Disability Employment Services arrangements, ahead of the commencement of a new model in 2023.

Better Access Australia supports a policy and program design process which has engaged with and listened to people with disability at all stages of planning and implementation and provided accessible information and opportunities for feedback. This principle aligns with our view that consumers and stakeholders must be an integral part of policy and program design and implementation.

**DISCUSSION TOPICS**

1. **Who should be able to access a specialist disability employment program?**

Specialist disability employment services are an important government service for people with disability whose needs would not be met by mainstream employment services. Gaining a job and maintaining paid employment is critical for many people with disability to achieve financial security, as well as to gain other benefits such as a broad social network, greater self-esteem and transferable work skills and experience. People with disability can and do make a substantial contribution to the workforce and the economy, with high productivity levels and lower levels of sick leave taken than people without disability on average.

People with disability may require individually tailored supports to succeed in the labour market, whether in a supported or mainstream job. However, many obstacles can stand in the way of people with disability obtaining and maintaining a job, including lack of practical support for job search and when starting a new job, negative perceptions about their capacity on the part of employers and lack of suitably trained disability employment service providers who provide consistency of support and advice, as well as follow up services to address any barriers that arise during the course of a person’s employment (for example, managing episodic disability).

1. **How can we simplify entry to the disability employment support model?**

The program and policy divisions between mainstream employment services and disability employment services may be clear from a systems and portfolio perspective, but from the perspective of the person with disability seeking help, these can appear artificial and overly bureaucratic. Mainstream employment services do assist people with disability and should continue to do so where that person’s individual needs can be met. However, there needs to be clear signposts and pathways between mainstream and disability employment services for those who need it.

As a fundamental principle, all employment services, including those for people with disability, should be flexible and tailored to the needs of the person. Better Access Australia believes that good public policy is designed with the client or customer at the centre. In practice, this would look like a service where the person can access a range of supports and services according to their needs – some people may need practical support around job search only, whereas other people may require day to day support in the workplace to do their jobs well. The person seeking the services should be able to trust a provider to meet their needs, and ‘meet them where they are’.

Eligibility for disability employment services needs to be carefully designed to enable access to those who need these services, and not exclude people. With around 1.4 million Australians having profound or severe disabilities, a carefully designed, adequately funded and well-managed disability employment service is critical to supporting Australians with disability to find and keep a job. Current eligibility for disability employment services includes those with a disability, injury or health condition that will last more than 6 months. In Better Access Australia’s view, this is a reasonable basis for eligibility which is not overly restrictive and would capture most people who would have need of disability employment services. However, we would caution against overly bureaucratic assessment processes and procedures that rule people in or out of the program. Simplified entry and access points to the program should be devised to reduce the burden on people with disability who seek to qualify and should take advantage of assessments in other contexts wherever possible to further reduce ‘red tape’ (eg use of application data for NDIS funding).

Future disability employment services should also look to include all modern employment pathways, including casual work, work from home or other locations, part-time, volunteer and community work. Consistent with the principles underpinning the National Disability Insurance Scheme, disability employment services should support *participation in social and economic life –* employment of all kinds, if engaging and fulfilling for the person, is a critical element of this.

1. **What employment services and supports would most help people with disability?**

Better Access Australia also supports the principle of engaging the broader community in supporting the inclusion of, and removing the barriers for, people with disability. We support the active promotion of the participation and inclusion of all groups, with a ‘no wrong door’ approach to systems, services and programs.

We also note that carers and supporters are a critical element in the economic and social participation of people with disability and support the principle that the needs of the whole family, care circle and supporters must be considered in policy and program design.

Better Access Australia takes a systems approach to policy design. There is a high need to carefully integrate the policy and program parameters of the NDIS with disability employment services. For example, for ease of assessment, anyone with an NDIS plan could automatically qualify for disability employment services to remove a layer of bureaucracy and red tape. The design process should actively seek out opportunities to remove red tape and overly burdensome assessment processes where other simpler checks would suffice.

1. **What employment services and supports would most help young people?**

Young people with disability have the most to gain from a high quality, timely and supportive employment service, due to the lifelong benefits that can be realised through engagement with the workforce in early adulthood. It is clear that the transition between education and work can be tricky for many young people and some are at risk of falling between the cracks and being left behind. This is the case for young people with disability who may face barriers to work such as low confidence, physical barriers to travel or building access, and negative perceptions about their capacity to deliver.

Young people are tech savvy and disability employment providers should offer innovative solutions to meet their needs. Similarly, employers should be offering creative solutions including through technology to hire and keep workers who experience disability. For example, use of voice to text technology is useful for people who may find it difficult to type, while Zoom and other video conferencing facilities have shown during the pandemic that productivity is not necessarily reliant on a physical presence in the office.

1. **What support do employers need to attract, employ and retain people with disability?**

Better Access Australia supports a direct and factual approach to working with employers, moving from ‘we need to educate employers about how people with disability can contribute to the workforce’, to one which is focused on ‘here’s how a person with disability fit within your workforce’. The ‘hearts and minds’ approach can only go so far, employers need to understand how people with disability support outcomes for their businesses.

Better Access Australia believes that the issues of perception and stigma about disability have been well known for many years now, and that existing approaches proposed in this strategy have made some, but not enough headway in the broader community.

It is time to be ambitious. Its time to leverage the changed work environment brought about by the COVID-19 pandemic and the accessibility and affordability of technology to rethink the work landscape for people with disability.

1. **How do we best tailor mutual obligation requirements to increase the likelihood of people with disability finding work in the future?**

Better Access Australia does not support punitive measures to push people with disability into paid work. Readiness for work can depend on many things including the person’s capacity which can change on a day-to-day basis. Chasing people with a disability over their efforts to seek and maintain work is overly bureaucratic and can lead to unnecessary stress for the person. Instead, the emphasis should be on support, tailored assistance and flexibility to help people define their own goals and strive to achieve them. The power needs to be in the hands of the individual, with the service working to help them achieve their goals.

1. **How can funding arrangements incentivise good work outcomes?**

Funding arrangements in employment services where payments are made based on certain outcomes being achieved can have unintended consequences, including churn and parking of harder to help clients. A funding arrangement tailored to individual needs, with capacity for flexibility and longer-term contact with the client, is preferred. Arrangements could be considered where part of a person’s NDIS package, if applicable, could be used for flexible and tailored employment services assistance.

1. **How do we drive high quality services and supports?**

However, Better Access Australia also views the problem as not just a lack of clear information on government responsibilities, but is also a matter of structural barriers that arise when people seek to transfer or move between different systems – for example, between the mainstream health system, National Disability Insurance Scheme, income support and employment support systems, as well as services providing mental health support, transport, housing, justice and other government services.

It is the intersection between systems where many problems arise for people with disability (and others); and where vulnerable people are at most of risk of falling between the cracks. This is why Better Access Australia considers the ‘no wrong door’ approach is especially crucial for people with disability who access many different services.

Better Access Australia believes that our health and social services sectors work best when all parties - public, private and not-for-profit - engage in good faith with the existing systems and processes, and that each party’s contribution is recognised and valued.

1. **How do we measure success?**

Better Access Australia supports regular, transparent reporting by government on outcomes achieved by people with disability through disability employment services.

Better Access Australia strongly recommends the continued engagement and collaboration with people with disability, community organisations, families and carers, research bodies and the private sector as the National Disability Plan is implemented.

We reiterate that consumer views on government policies and programs which affect them are invaluable in informing policy and implementation revisions and redirections as needed. Government must be responsive, adaptable and forward thinking, while maintaining a constant and high-quality feedback loop with the community.

Better Access Australia looks forward to engaging further with the government on issues affecting people with disability and other health and social service matters.