

Ph 1800 033 660 | E [bca@bca.org.au](mailto:bca@bca.org.au) | W [bca.org.au](http://www.bca.org.au/) | ABN 90 006 985 226

# Response to The New Disability Employment Support Model Consultation Paper

Australian Government

Department of Services

Email: [desconsultation@dss.gov.au](mailto:desconsultation@dss.gov.au)

Author: Jackson Reynolds-Ryan, National Policy Officer

[jackson.reynolds-ryan@bca.org.au](mailto:jackson.reynolds-ryan@bca.org.au)

31st January 2022

## Contents

[Response to The New Disability Employment Support Model Consultation Paper 1](#_Toc94142101)

[Contents 2](#_Toc94142102)

[1. Introduction 3](#_Toc94142103)

[1.1 About Blind Citizens Australia (BCA) 3](#_Toc94142104)

[1.2 About people who are blind or vision impaired 3](#_Toc94142105)

[2. Blind Citizens Australia's submission 3](#_Toc94142106)

[3. Submission context 4](#_Toc94142107)

[4. Submission 4](#_Toc94142108)

[Topic Area #1 – Who should be able to access a specialist disability employment program? 5](#_Toc94142109)

[Topic Area #3 – What employment services and supports would most help people with disability? 6](#_Toc94142110)

[Topic Area #4 – What employment services would most help young people? 10](#_Toc94142111)

[Topic Area #5 – What support do employers need to attract, employ and retain people with disability? 11](#_Toc94142112)

[Topic Area #8 – How do we drive high quality services and supports? 12](#_Toc94142113)

[Topic Area #9 – How do we measure success? 13](#_Toc94142114)

[5. Summary of Recommendations 14](#_Toc94142115)

## 1. Introduction

### 1.1 About Blind Citizens Australia (BCA)

Blind Citizens Australia (BCA) is the national representative organisation of Australians who are blind or vision impaired. Our mission is to inform, connect and empower Australians who are blind, or vision impaired and the broader community. We provide peer support and individual advocacy to people who are blind, or vision impaired across Australia. Through our campaign work, we address systemic barriers limiting the full and equal participation of people who are blind or vision impaired. Through our policy work, we provide advice to government and the community on issues of importance to people who are blind or vision impaired. As a consumer-based organisation, our work is directly informed by lived experience of blindness and vision impairment. Our members, our directors and most staff are blind or vision impaired.

### 1.2 About people who are blind or vision impaired

There are currently more than 453,000 people who are blind or vision impaired in Australia[[1]](#endnote-1) with estimates that this will rise to 564,000 by 2030.[[2]](#endnote-2) According to Vision Initiative, around 80% of vision loss in Australia is caused by conditions that become more common as people age.[[3]](#endnote-3)

Australians who are blind or vision impaired can live rich and active lives and make meaningful contributions to their communities: working, volunteering, raising families and engaging in sports and other recreational activities. The extent to which people can actively and independently participate in community life does, however, rely on facilities, services and systems that are available to the public being designed in a way that makes them inclusive of the needs of all citizens – including those who are blind or vision impaired.

## 2. Blind Citizens Australia's submission

Blind Citizens Australia (BCA) welcomes the opportunity to make a submission in response to the new Disability Employment Support Model Consultation Paper. Our response is based on consultations with our members, previous and current submissions, and advocacy work in the sector.

## 3. Submission context

This submission is based on existing legislation and frameworks, noting gaps in the fulfilment of requirements laid out in existing documentation. The pertinent acts and legislation are:

1. The Disability Discrimination Act 1992 (Cwlth)
2. The Disability Services Act 1986 (Cwlth)
3. National Disability Insurance Scheme 2013 (Cwlth)
4. United Nations Convention on the Rights of Persons with Disabilities (CRPD) 2006
5. The National Disability Strategy 2010-2020 (this strategy coordinates the implementation of the UNCRPD)
6. The National Disability Agreement 2008.

## 4. Submission

According to the Australian Bureau of Statistics (ABS), over 4.4 million Australians have some form of disability - roughly equating to 1 in every 5 Australians having a disability. In terms of employment participation, data from 2019 indicates that only 48% of people with disability of working age (15–64 years) are employed, compared with 79% without disability[[4]](#endnote-4). In other words, 52% of Australians with disability of working-age are unemployed.

In terms of data for people who are blind or vision impaired, the World Blind Union (WBU) conducted an employment survey with nearly 3,000 respondents. Approximately 30% of respondents resided in Oceania, including Australia. Statistics indicated similar trends to Australian data from 2019. The employment percentages for respondents to the WBU survey were 62.39% currently employed, 14.32% not currently employed but employed within two years, and 31.67% unemployed long-term (not currently employed nor employed within two years). The respondents indicated that with their current level of vision or blindness they had the following amount of work experience; 42.79% had more than ten years, 22.39% six to ten years, 19.64% less than two years, and 15.27% two to five years[[5]](#endnote-5).

People with disability consistently face barriers in receiving prerequisite education, and with finding and maintaining employment. These barriers include negative assumptions, attitudes and misconceptions held by employers and the wider community about the productivity and capability of people with disability.

Disability Employment Service (DES) providers can play an important role in helping a ‘would-be worker’ to get a foot in the door. However, many DES providers are not currently meeting the needs of jobseekers who are blind or vision impaired, and often have little understanding of how to best support a person who is blind or vision impaired to seek, gain and keep employment. This submission will highlight the concerns of people who are blind or vision impaired with the current Disability Employment Services, and provide recommendations for how the system can be improved. Specifically, it will address several of the questions raised in the Consultation Paper in areas pertaining to people who are blind or vision impaired who are seeking, or participating, in employment.

### Topic Area #1 – Who should be able to access a specialist disability employment program?

#### What is the role of the National Disability Insurance Scheme in supporting

#### employment pathways, and how can this complement a future disability

#### employment support program?

The National Disability Insurance Scheme (NDIS) has a role to play in supporting people with disability with employment pathways; however, people who are blind or vision impaired make up only 2% of participants, and the Scheme itself supports less than 10% of the total population of people with disability in Australia[[6]](#endnote-6).

Work generates wages, less reliance on welfare, dignity, a sense of purpose and productivity. Work is the cornerstone of social inclusion, and people who are blind or vision impaired can and have worked in a range of occupations; ranging from a car detailer to an accountant to a chemical manufacturer to an administration assistant - to name just a few careers. It is crucial the Federal Government ensures an effective and accessible disability employment support program outside of the work done by the NDIS.

### Topic Area #3 – What employment services and supports would most help people with disability?

#### Experiences of receiving employment support from a DES or other employment services provider - what was good and what improvements could be made?

As part of the consultations undertaken by Blind Citizens Australia (BCA) to inform our response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (the Disability Royal Commission), members provided extensive feedback about their experience with DES. A major concern for members included the high turnover of staff and subsequently frequent changes of employment consultants, and the confusion this can create:

“It seems there are always changes and reforms and renaming and recontracting and changes to the way services are delivered. It’s so confusing and the staff change over [sic] is huge”

This high turnover and part-time nature of DES staff can impact on a job seeker’s experience of a DES and the consistency of support that the person receives. Another member noted the frustration that “people can’t get what they need, and you have to start telling your story again and again”, and that the high turnover acts as a disincentive to continue to look for work when people feel unsupported.

Considering this high turnover of staff in DES providers, it is essential that all client information can be handed over to new consultants without people with disabilities having to re-introduce themselves, explain their employment history, and their goals for employment. Ultimately however, a stable DES workforce will be important for job seeker confidence and success. The Department of Social Services (DSS) should investigate incentives to support DES staff to remain in the industry, as well as providing education and training to keep DES staff informed and supported in their role of supporting people with disability.

The feedback BCA received from members using DES also highlighted an issue whereby people are being offered opportunities far below their capability or that is unrelated or incompatible with their career goals. One member commented:

“Too much focus [was] on them finding me ‘something’ and not enough on what I was skilled at and wanted to do… [The] consultants would tell me that they had a particular type of work and workplace instead of me having choice and control of my career plans.”

This lack of personalised support can lead to people becoming incredibly disenfranchised to the point that they opt out of receiving support to get a job and instead decide to try on their own, with mixed results. Members commented that for DES to be effective and useful, the support needs to be more hands on and tailored to the individual; and that qualifications, employment history and overall capability should be properly considered by DES providers when they are seeking employment opportunities for clients.

It is important that DES providers have a longer-term view and recognise that in some circumstances simply updating résumés and organising interviews is not the answer, particularly for people who have just lost their sight. A skilled employment consultant will know that sometimes the road back to employment will be a longer one that requires people new to vision loss to go through a process of grieving, re-skilling and learning to do work differently. However, this will only occur if DES staff dealing with clients who are blind or vision impaired have specialist technical understanding of their needs and capabilities, or ready access to this information.

#### What type of services and support would best help a person with disability find and keep a suitable job, and progress their career? Who should provide this support?

As noted above, many BCA members have reported that engaging with DES providers has led to offers for positions well below their skill level and capacity. Providing support in finding ‘a suitable job’ means opportunities are evenly matched with experience and expertise. Further, BCA received reports of workplace failure to support advancement through training or development of skills that would enable career advancement, with one member commenting:

“I did not have many opportunities to be trained in any other skills to perform other duties. Training was not available to me to progress my skills, learn new competencies or further my career.”

Further, people who are blind or vision impaired must also have appropriate opportunities for career progression. BCA believes the promotion of people with disabilities into leadership positions is important in developing a culture of accessibility and diversity in a workplace. Employment quotas generally exist for entry level employment; however, it is critical that people with disabilities are offered opportunities at all levels of management. At present, there is a distinct lack of representation of people with disabilities in higher leadership positions and on boards of organisations.

It is also crucial that a person’s location should not be barrier to accessing the support of a DES, and that all job seekers with disability should be able to access a DES regardless of where they live and receive comparable support to people living in metropolitan areas. This can be achieved through the use of technology such as Skype, videoconference, email and phone to maintain contact with jobseekers, and visits with jobseekers in their region or at a central location. Where a DES is unable to cover the town in which the jobseeker lives, the DES should aim to work in partnership with a local generalist employment service to assist the jobseeker to obtain work. To ensure jobseekers receive appropriate support, it is vital that all services (both DES and generalist employment services) provide staff training in supporting people who are blind or vision impaired, and with disability specific supports.

Finally, the support offered by a DES should be flexible. Many people who are blind or vision impaired will not need assistance to prepare a résumé, but may require assistance to attend interviews in new and unfamiliar locations.

#### What education and training opportunities help people with disability overcome the entry barriers to employment?

DES providers must be able to effectively support employees who are blind or vision impaired in their transition to a new workplace. We believe the assistance provided by DES should include preparation programs for people who are blind or vision impaired to allow them to develop skills that are vital for the workplace.These programs would include orientation and mobility (O&M) training, IT training, job seeking and interviewing skills and other pertinent areas to prepare for employment.

DES support should also involve discussions when and how assistive technology can be used (including capacity to deliver or support training in this technology) and knowledge of relevant assessments, referrals, strategies, government subsidies and blindness specific resources which are available. We believe that longer term, the focus of DES should also include career counselling, knowledge of further education options and employment internships.

From the feedback we have received from members, we know that often work related issues don’t arise until after the person has commenced employment. An employee with disability should be able to seek the support of a DES to help address these issues, even where they may not have used a DES to get their job in the first place. People who are currently in paid work due to the assistance of a DES may require the continued assistance of a DES to resolve work related issues, including a referral pathway for JobAccess. It is important that the availability of this support should not be linked to a timeframe such as the duration of a wage subsidy. Likewise, an employee with a disability who has exited a DES should be able to re-enter the same DES, and be assisted in a timely manner, to access the support they require.

#### What employment support do mature age people with disability need to successfully gain or retain employment, or transition into new employment or a new career?

Seeking employment is particularly problematic for mature age jobseekers, as people over 65 are not eligible to access DES. A member who is over 65 however who was accessing DES prior to turning 65 articulated his concern:

“As I am now over the age of 65, I am no longer eligible to join a DES. I am also not eligible for employment support through the National Disability Insurance Scheme due to my age…. One of my main concerns is that if for some reason Job Access ceased to exist or if I [were] inadvertently removed from my DES provider then I would have zero employment support available to me.”

BCA believes strongly that age should not be a barrier to access a DES and the criteria to join a DES should not be arbitrarily restricted by age, with the removal of the requirement that jobseekers must be under 65 years of age. This age limit should be reviewed in light of the increase in pension age eligibility, increased financial pressures to continue working and the desire by older employees to continue to remain in the workforce. An older jobseeker can have a lot to offer a potential employer and should be able to access the support of a DES as necessary.

#### Recommendations

1. To mitigate the impacts of high DES staff turnover, ensure all client information (including employment history and goals) can be handed over to new consultants.

2. Investigate possible incentives to support DES staff to remain in the industry, along with regular education and training to keep these frontline staff informed and supported.

3. Qualifications, employment history and overall capability should be properly considered by Disability Employment Service providers when they are seeking employment opportunities for clients to ensure they are appropriately matched.

4. DES staff dealing with clients who are blind or vision impaired must have specialist technical understanding of their needs and capabilities, or ready access to this information.

5. People who are blind or vision impaired must have appropriate opportunities for career progression and leadership development.

6. Location should not be barrier to accessing the support of a DES – all job seekers with disability, regardless of where they live, should be able to access a DES and receive comparable support to people living in metropolitan areas.

7. Develop workplace preparation programs for people who are blind or vision impaired – including orientation and mobility (O&M) training, IT training, job seeking and interviewing skills etc.

8. Ensure jobseeker with disability can receive the support of a DES, regardless of current employment status.

9. Remove the age restriction for accessing DES to help support people over the age of 65 to remain in the workforce.

### Topic Area #4 – What employment services would most help young people?

Young people are the future of this country. Government has a role to play to ensure that people who are blind or vision impaired, especially young people, are provided with the educational and employment skills necessary to be able to contribute economically. One step is to broaden the scope for DES providers so they can assist students and job seekers through work experience programs, or through internship type experiences in other similar programs.

A structured work experience is generally a part of secondary education in upper grade levels, and provides students a valuable opportunity to build social skills, and to understand different workplaces and practices. However, historically, work experience opportunities were less readily available to many students who were blind or vision impaired. Members who missed out on this experience have told us: “Often, we don’t the chance to do paid work through school like our peers (think retail or fast food) which means we miss out on developing some very important life and work skills”.

#### Recommendations

10. Encourage DES providers to offer work experience or other internship type programs to help build social skills, and understand different workplaces and practices.

### Topic Area #5 – What support do employers need to attract, employ and retain people with disability?

For someone who is blind or vision impaired, the best chance at keeping a job and having a successful employment experience is largely reliant on how supportive a potential employer is about accessibility needs – including being willing to make appropriate workplace accommodations. It is therefore vital that DES staff assisting job seekers to find employment should be able to explain to potential employers, in a clear and easy to understand manner, how equipment is used (including allaying fears of how this might impact on other workers), what modifications are required to systems, how to make the role accessible and how tasks can be completed differently. DES should also be able to inform employers of the potential costs, if any, of making modifications. Where possible, DES providers should seek to include jobseekers in discussions with potential employers from early on in the process, to enable the individual to speak about their own accessibility needs.

After securing employment, workplace training is often needed to ensure a person who is blind or vision impaired can achieve their work goals. Unfortunately, members have consistently reported a lack of appropriate skills training in their workplaces. One member discussed the difficulties they can face when they are being trained on the job by someone who does not understand the needs of people who are blind or vision impaired:

“If I’m learning a new system or process on a computer they say things like ‘double click the icon on the computer’, I can’t see the icon, and I don’t use a mouse. I use screen readers NVDA and JAWS that uses key strokes. So, having training from someone who is blind or understands the use of screen readers would be much more beneficial.”

It is therefore crucial that training is delivered by peers who are blind or vision impaired, or external trainers with specific knowledge and skills of the types of devices and programs used by people who are blind or vision impaired. BCA understands that even employers who are genuinely committed to improving employment outcomes for people with disability may struggle with the financial costs of such training and believe this should be supported by DES.

Ideally, we would like to see DES launch an employment mentoring program. This program would pair people who are blind or vision impaired, who are either seeking employment, or newly employed. The mentor would be matched based on their expertise, to the mentee. The mentor would be a person who is also blind, or vision impaired who can provide guidance to the mentee.

#### Recommendations

11. Ensure DES staff understand and can explain to potential employers how equipment is used (including allaying fears of how this might impact on other workers), what modifications might be required, and how to make the role accessible.

12. Include jobseekers in discussions with potential employers wherever possible.

13. Ensure workplace training is delivered by peers who are blind or vision impaired, or by external trainers with specific knowledge and skills of the needs of people who are blind or vision impaired.

14. Support DES providers to launch an employment mentoring program for blind and vision impaired job seekers.

### Topic Area #8 – How do we drive high quality services and supports?

#### 8.6. Is there a market need for specialist providers (disability/industry/age cohorts) that would increase employment opportunities?

It is a significant issue for people who are blind, or vision impaired that only one organisation exists in Australia that covers both blindness service provision and that is a DES provider. One member told us:

“Because most blind people are moved towards [this blindness service provider as] a DES if they are blind or vision impaired… I feel I wasn’t given choice and didn’t have a great experience and would have preferred another service.”

The issue is entrenched due to other DES not having a thorough understanding of blindness, with members commenting that other DES programs don’t seem to have an “understanding on disability or blindness.” It is critical that more DES providers are trained in working appropriately with clients who are blind or vision impaired, to enable choice and control for people accessing employment services.

DES providers should also work collaboratively with other service providers to assist job seekers to develop disability-specific skills, especially blindness agencies best placed to develop orientation and mobility and IT skills. Links with disability-specific peer support networks should also be encouraged. Facilitated peer support between people who are blind or vision impaired (both those seeking employment and those currently employed) can lead to encouragement about how to meet challenges, complete tasks and achieve success.

#### Recommendations

15. Ensure more DES providers are trained in working appropriately with clients who are blind or vision impaired, to enable choice and control for people accessing employment services.

16. Encourage DES to work collaboratively with other service providers and peer support networks – especially blindness agencies best placed to help job seekers develop orientation and mobility and IT skills

### Topic Area #9 – How do we measure success?

#### What will success look like for: people with disability / the community / employers / service providers / government?

Consumers need to be front and centre of all decisions for any reform of DES to be successful. To ensure this occurs, consumer organisations (such as Blind Citizens Australia) should be consulted throughout any changes or re-designs of the DES system.

Reform of DES should include a reference group made up of a representative sample of people with disability receiving services whose needs are not currently being met, to ensure that processes can be improved.

We believe a DES performance framework should be developed to help enable continuous improvement. This framework should include key performance indicators which relate to average weekly wages and average weekly hours of work to ensure that people with disability are meaningfully employed. The framework could also clearly lay out a role for DES providers in improving the employment prospects of individuals who are in work but under-employed (both in terms of the hours worked and the skills used). Further, we believe employees working at an Australian Disability Enterprise (ADE) should be entitled to access a DES service to enable their transition to well-paid and/or open employment.

In addition to a performance framework, we believe that Contracts for generic disability employment services should be based on evidence of past performance, including outcome rates for individual services, success of placements and provision of ongoing support. This information should be publicly available.

Ultimately, a successful placement is one where the jobseeker is placed in a role that is in line with their interest, goals and qualifications. It is therefore vital that this framework includes a way to measure jobseekers’ satisfaction with securing employment that meets these criteria, rather than simply being placed in the first position that is offered.

#### What do people with disability and employers need to make an informed choice to select the best provider for their needs and how should this information be made available?

We believe that a jobseeker should be able to choose their own DES. Whilst referrals by Centrelink to a DES are helpful for some individuals, the requirement to complete job capacity assessments and the limited range of DES providers offered by Centrelink can inadvertently increase hurdles to employment. Our members would welcome the opportunity to independently select and approach a DES of their own choosing.

#### Recommendations

17. Establish a DES performance framework to support continuous improvement.

18. Ensure generic DES contracts are based on evidence of past performance.

19. Develop a way to measure jobseekers’ satisfaction with securing employment.

20. Ensure jobseekers can choose their own DES, and that a large enough provider market exists to allow a genuine choice.

## 5. Summary of Recommendations

BCA strongly recommends the following actions:

1. To mitigate the impacts of high DES staff turnover, ensure all client information (including employment history and goals) can be handed over to new consultants.

2. Investigate possible incentives to support DES staff to remain in the industry, along with regular education and training to keep these frontline staff informed and supported.

3. Qualifications, employment history and overall capability should be properly considered by Disability Employment Service providers when they are seeking employment opportunities for clients to ensure they are appropriately matched.

4. DES staff dealing with clients who are blind or vision impaired must have specialist technical understanding of their needs and capabilities, or ready access to this information.

5. People who are blind or vision impaired must have appropriate opportunities for career progression and leadership development.

6. Location should not be barrier to accessing the support of a DES – all job seekers with disability, regardless of where they live, should be able to access a DES and receive comparable support to people living in metropolitan areas.

7. Develop workplace preparation programs for people who are blind or vision impaired – including orientation and mobility (O&M) training, IT training, job seeking and interviewing skills etc.

8. Ensure jobseeker with disability can receive the support of a DES, regardless of current employment status.

9. Remove the age restriction for accessing DES to help support people over the age of 65 to remain in the workforce.

10. Encourage DES providers to offer work experience or other internship type programs to help build social skills, and understand different workplaces and practices.

11. Ensure DES staff understand and can explain to potential employers how equipment is used (including allaying fears of how this might impact on other workers), what modifications might be required, and how to make the role accessible.

12. Include jobseekers in discussions with potential employers wherever possible.

13. Ensure workplace training is delivered by peers who are blind or vision impaired, or by external trainers with specific knowledge and skills of the needs of people who are blind or vision impaired.

14. Support DES providers to launch an employment mentoring program for blind and vision impaired job seekers.

15. Ensure more DES providers are trained in working appropriately with clients who are blind or vision impaired, to enable choice and control for people accessing employment services.

16. Encourage DES to work collaboratively with other service providers and peer support networks – especially blindness agencies best placed to help job seekers develop orientation and mobility and IT skills

17. Establish a DES performance framework to support continuous improvement.

18. Ensure generic DES contracts are based on evidence of past performance.

19. Develop a way to measure jobseekers’ satisfaction with securing employment.

20. Ensure jobseekers can choose their own DES, and that a large enough provider market exists to allow a genuine choice.

1. Vision 2020. *State of eye health in Australia*. <http://www.vision2020australia.org.au/our-work/avoidable-blindness-and-vision-loss> [↑](#endnote-ref-1)
2. Australian Network on Disability. *Disability statistics*. <https://www.and.org.au/pages/disability-statistics.html> [↑](#endnote-ref-2)
3. Vision2020. *Eye health in Australia*. <http://www.visioninitiative.org.au/common-eye-conditions/eye-health-in-australia> [↑](#endnote-ref-3)
4. Australian Institute of Health and Welfare. (2019, September 3). People with disability in Australia. Workplace arrangements. Australian Government. <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/employment/employment-participation-needs-and-challenges/workplace-arrangements> [↑](#endnote-ref-4)
5. World Blind Union. (2020, June 16). WBU Employment Committee report [↑](#endnote-ref-5)
6. NDIS (2021). Quarterly Report Q 1: 2021-22. Accessed at <https://www.ndis.gov.au/media/3633/download?attachment> [↑](#endnote-ref-6)