



Disability
Employment
Australia

Represent, Support, Resource

Disability Employment Australia response to the DES 2023 Consultation Paper

ENGAGING MEMBERS
RAISING AWARENESS
SHAPING THE FUTURE



About Disability Employment Australia



Disability Employment Australia (DEA) is the country's peak body for Disability Employment Services (DES). We are internationally recognised as the pre-eminent organisation representing, supporting and resourcing disability employment in Australia.

As a membership organisation, we represent the interests of disability employment stakeholders to government bodies, consumer and employer groups. DEA assists the Government to deliver high quality employment support to people with disability.

DEA has a responsibility to foster excellence, innovation and flexibility of service within the Disability Employment Services program. We support our members to achieve best practice service provision, and advise, advocate, train, inform and undertake events to strengthen and promote the sector.

We believe every member of society, including those with disability, should be fully involved in the community and have control over their own life choices. Participation in the open labour market is a crucial factor in realising these goals. We strive to inspire, challenge and celebrate disability employment.

DEA has been a leader in the disability employment sector for a quarter of a century, our membership encompasses 70% of the sector's providers. Previously, DEA has liaised with government over critical changes and developments including:

- Moving from block to case-based funding.
- Developing the participant assessment model.
- Centrelink streaming participants to appropriate services.
- Uncapping DES.
- Moving from state-based support to a national representative peak body support.
- Establishing a Disability Employment Hall of Fame.
- Developing the DES Essentials training package.
- Moving to five-year contracts.
- The 2015-17 DES review, including advocating choice & control and a person-centred model
- Advocating a National Disability Employment Strategy.
- DES 2023 reforms.

Disability Employment Australia acknowledges and pays respect to the past, present and future Traditional Custodians and Elders of this nation and the continuation of cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples.



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1

Executive Summary

Executive Summary

DES providers increased employment 26 weeks outcomes for people with disability (those assessed by Services Australia to be provided with individualised, specialised supports) by 26% between June 2020 and June 2021. Additionally, job placements improved by 135% for the same period.

DEA's response is the result of a detailed consideration of the set of questions and ideas as presented in this Consultation paper. We have also leveraged our history in disability employment, our members ideas and a wide array of national and international research.

DEA is concerned with the assumptions underpinning the consultation process around the new disability employment support program, which aims to improve employment outcomes for people with disability.

These assumptions relate to the capability of current DES providers, the manner in which they assist and support DES participants, the extent of engagement activities with employers and the DES program employment outcomes.

Much of what is understood about DES providers and the DES program is anecdotal or focused on incomplete data analysis. Reforms must be based on demonstrable research and evidence, improved intersecting data and independent analysis.

In this response, DEA highlights where policy decisions have critically impacted service delivery. These examples date from 2011/12 and even earlier, to the current DES program. DEA supports reviewing the DES program to identify potential improvements in service delivery and outcomes. However, we don't support the notion that DES does not work.

For example, consider this: On one hand, the Boston Consulting Group (BCG) 2020 report identifies an employment outcome issue with the DES program and relates that issue to the DES program cost. On the other hand, the DES program has increased employment outcomes by a margin of 30% over the last 18 months, meets the DSS budget KPIs for 2020/21 and can be demonstrated to provide a financial return on investment to the government of 175%.

DES delivers better employment outcome rates for people with disability than its most obvious employment service comparison, jobactive. And yet, there is talk of more people with disability flowing through the Services Australia system into that generalist model.



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One critical point in reference to the process to determine reforms of the current DES program to establish its next iteration, the new disability employment support program.

DEA is a key representative in these reforms. We have seen firsthand the hard work, the commitment of stakeholders, the vast array of information being discussed and contested. We are also starkly aware that the process is being rushed and the work is fraying.

There is a simple solution. Extend the current DES program by 12 months. This will allow the important reform process to find reasonable common agreement on potential aspects to reform.

More critically, it will allow potential reform ideas to be tested and trialled. Without a 12-month extension the reform project period will not have adequate time to complete the work in a reasonable manner. Rushing the process will push the core objective, *to improve employment outcomes for people with disability*, backwards.

The Minister, DSS, reference group members and committed stakeholders have invested too much of their collective and considerable knowledge, as well as their deep and resonating interest in this project. A reform project of this nature must be given appropriate time and resources (testing and trialling) to ensure reforms are fit for purpose. Extending the current DES program by 12 months will give the reform project appropriate time to achieve its objectives.

DEA trusts that the information provided in the following response will be used by DSS to “understand what is important to consider when designing the new disability employment support program”. We encourage DSS to contact us to discuss any points or ideas raised in the response.



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Introduction

Introduction

The DSS ‘*Shaping your new disability employment support program*’ consultation paper¹ is critical in the evolution of DES. To consider how the program might be improved, it’s crucial to understand what the current DES 2018 version delivers.

DSS commissioned Boston Consulting Group (BCG) to conduct a review of the DES 2018 program in May/June 2020. The review found that the employment outcome rate was not satisfactory and that the program costs per outcome were concerning.

Despite this finding, DES providers increased employment (26 weeks) outcomes for people with disability (those assessed by Services Australia to be provided with individualised, specialised supports) by 26% between June 2020 and June 2021. Additionally, job placements improved by a staggering 135%² for the same period.

As part of its review, the BCG conducted a cost analysis of DES 2018, which initiated the question, *what is the return on investment for the government in operating DES?*

When DEA conducted its own research, applying the calculations presented in the BCG report, it identified a significant financial return on the government’s investment. This return, noted in the Executive Summary, will be discussed in DEA’s submission.

There is much negative commentary around the current program’s ability to place people with disability into sustainable employment. And, anecdotal observations seem to have more bearing on identifying improvements and reforms than they should.

Rather than anecdotal evidence, data and research must be drawn on to test what is and isn’t working. In Topic 2), for instance, DEA recognises the current assessment system must be simplified to ensure easier entry into the new Disability Employment Support Model.

Saying this, DEA and other peak bodies have searched internationally for evidence-based programs that achieve higher employment outcomes than DES does. So far, we have found none.

Improving employment outcomes is inherently linked to community attitudes and accessibility. In Topic 5) we note that building employer confidence is key to boosting the employment rate of people with disability. And in Topic 3), that encouraging education and training, and making services accessible, is crucial to supporting job seekers and employers. These are some of the barriers to meaningful employment that DEA and DES providers work hard to ameliorate on a daily basis.

¹ Department of Social Services 2021, *Shaping your new disability employment support program*, <<https://engage.dss.gov.au/wp-content/uploads/2021/11/Consultation-Paper-New-Disability-Employment-Services-Model.pdf>>

² Labour Market Information Portal 2021, *DES Monthly Data*, Australian Government, <<https://lmip.gov.au/default.aspx?LMIP/Downloads/DisabilityEmploymentServicesData/MonthlyData>>



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The recently released 2021-2030 National Disability Employment Strategy identified attitude and accessibility amongst the four pillars we must address, and reduce the alarming 30 percentile point workforce participation gap between people with disability and people without.

As the Consultation paper notes, right up front.

“People with disability want to work and have equal opportunity to experience the benefits that work brings. This includes improved mental and physical health, financial security, increased self-esteem and social connection. It is important people with disability have the skills and supports to participate effectively and maximise their potential for a career, not just a job. When people with disability have a career, not just a job, it allows them to unlock their talents and contribute to the economy.”³

DEA agrees with this statement.

The DES program is central to assisting and supporting people with disability, injury and health conditions in their search for work, job satisfaction and career development. No other employment program in Australia achieves the employment outcome rate that DES does. There is no other model in the world as well developed or as capable of delivering positive employment and societal outcomes as DES.

DEA has ideas and solutions regarding what needs to be improved and how that can be done. In line with our response to Topic 4, support for job seekers should be person-centred, holistic, and integrated. Understanding how DES providers (have and continue to) engage their local communities is key to improving the current model.

For example, we know that DES providers have strong connections with both employers and job seekers. DES providers support tens of thousands of people with disability into employment on an annual basis. Despite this, research on or analysis of DES provider/employer engagement has been minimal.

Assessment of employer engagement in DES must be based on independent, evidence-based research and analysis, rather anecdotal evidence.

³ *Shaping your new disability employment support program*, pg. 4



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

Topic 1

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

In response to this topic, we need to recognise core legislative developments and how they inform policy, programs and best practice. Australia's obligations as a signatory to the United Nations Convention on the Rights of People with Disabilities (UNCRPD)⁴, with a specific focus on Article 27, contemporary disability policy in practice and NDIS principles are critical markers.

However, the roots of the DES program go much deeper. DES originates from The Disability Services Act (1986). The practical application of the Act was clarified and improved via a number of notable actions. These included the first Commonwealth State Disability Agreement in 1991⁵ (the federal government has responsibility for the planning, policy setting and management of specialised employment assistance) and the Disability Discrimination Act 1992⁶.

We should also acknowledge the hard work of people with disability, their families, advocates and community service providers. These providers set up employment services to assist people with disability, injury and health conditions to find and keep a job in the 'open' employment market. Many of these providers are still in operation today, more than 30 years later.

To improve the current DES there should be access to accurate data, going back at least ten years, on who has accessed DES, noting where access for a cohort has changed. The DES reference group should be provided these data sets to identify fluctuations in user cohorts and analysis on why these fluctuations may have occurred.

A greater emphasis on data and program service will raise awareness of the most disadvantaged job seekers, identify skills shortages and measure employee/employer satisfaction.

⁴ United Nations n.d, *Convention on the Rights of Persons with Disabilities (CRPD)*, Department of Economic and Social Affairs – Disability, <<https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html>>

⁵ Department of Social Services 2019, *Commonwealth, State and Territory Disability Agreements*, Disability and Carers, Australian Government, <<https://www.dss.gov.au/our-responsibilities/disability-and-carers/program-services/government-international/commonwealth-state-and-territory-disability-agreements>>

⁶ Australian Government 1992, *Disability Discrimination Act 1992*, <<https://www.legislation.gov.au/Details/C2016C00763>>



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The 2018 DES reform recommendations made it clear who should be able to access DES, the specialist disability employment program. Unless something has changed since June 2017, it's assumed the DES specialist disability employment program will continue to be available to those who need it.

The DES specialist disability employment program provides individualised support. However, access to DES is determined by a Services Australia assessment process. Of approximately one million people with disability of working age looking for work in Australia, many will find employment via their own means, while others will decide the risks involved are too much. Upwards of 60% will go through the Services Australia/Centrelink process.

That process has seen around 250,000 people with disability referred to jobactive, the mainstream employment services. Another 300,000 people with disability who go through this process will be identified to complete another assessment. It is this process that determines whether a person requires more specialised employment support⁷ from a DES provider.

Additionally, more than 460,000 people with disability, including over 140,000 people of working age, undertake a different assessment and are NDIS participants.⁸ NDIS participants can choose to include employment supports in their NDIS plan.

Directing job seekers to the appropriate employment stream is not simple. DEA believes that DES support should be offered to anyone who needs to access it. In order to achieve this, there are a number of questions that need to be addressed including:

- Is the Centrelink assessment system (especially as it goes online) fit for purpose?
- Will a future disability employment support program include employment pathways such as casual and part-time employment, community engagement, voluntary work and short-term unpaid work experience?
- Should voluntary and unpaid work experience be included under the definition of employment? Or, should these be formalised in the DES 2023 Deed as recognised pathways, which deserve relevant performance weighting and milestone fee payments?

A specialist disability employment service assists people with identified barriers. Government recognises that this specialist disability employment service is a critical support to enable hundreds of thousands of people with disability seek, find and keep a job. DES, as the Australian specialist disability employment service, assists people with identified and assessed barriers. These may relate to attitudes, education, socio-economic factors and unemployment history. On average, a person entering the

⁷ Labour Market Information Portal 2022, *Welcome to the Labour Market Information Portal*, Australian Government, <<https://lmip.gov.au/>>

⁸ NDIS 2021, *Explore Data*, NDIS, <<https://data.ndis.gov.au/explore-data>>



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current DES program has been unemployed for 2+ years.⁹ Providing individualised and intensive supports, building confidence and capability, on the pathway to employment is what DES is for and why access should not be constricted.

A tailored program that offers choice and control is more likely to accommodate a participant's needs. Individualised support, while volunteering, in unpaid work experience, community engagement, training and education, and casual employment, will strengthen participants' confidence while finding and sustaining employment.

Critical to DES reforms is the alignment with the NDIS to offer employment supports for NDIS participants. Recognition and endorsement is required by the NDIA of the value DES providers offer, similar to that afforded to other disability service providers.

Receiving DES support should be considered as per the NDIS Participant Employment Strategy and in the development of supports in employment. This is consistent with the choice and control principles inherent in the NDIS. By acting as the intermediary employment support, DES can raise awareness, confidence and commitment in employers and increase employment outcomes for NDIS participants.

In summary, the delineation between what supports a person with disability will receive as a DES participant versus jobactive/NESM online and enhanced services must be made clearer. DSS can achieve this by better informing the public of the role of DES as a specialist disability employment program.

Beyond the Service Australia gateway assessment process, DES providers are best placed to offer high quality employment outcome focussed supports in employment to NDIS participants.

⁹ Labour Market Information Portal 2021, *DES Monthly Data*



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

Topic 2

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

DEA believes there is an assessment culture associated with the DES program that leads to people with disability undertaking a needlessly high number of assessments during their employment journey. The current assessment system is flawed and must be simplified to ensure easier entry into the new Disability Employment Support Model.

Under the current arrangement, potential participants of the DES program undergo an assessment, such as an Employment Services Assessment (ESAt) and/or a Job Capacity Assessment (JCA), to determine their eligibility for the program.

Services Australia staff conduct these assessments. Participants are assigned a benchmark indicating how many hours per week the assessor thinks the participant could work. Currently 0-7 benchmark participants are not eligible for the DES program while the 30 plus group is referred to jobactive. Benchmarks are based on the medical model of disability¹⁰, which focuses on perceived deficits rather than what a person with disability can do.

DEA believes that benchmark hours are outdated and inflexible and are confusing for employers. Benchmarking dictates not only time, but the types of jobs participants are referred to. DEA wants the Government to undertake a public, transparent evidenced-based review of the DES assessment system with a specific focus on ESAts and JCAs to establish a baseline of best practice, minus benchmark hours. Such a review should incorporate participant and provider concerns.

The current system not only leads to numerous assessments for job seekers but incorporates those triggered by incorrect benchmark hours. DEA recommends the Government reduces the number of assessments, beginning with the cessation of the 78-week program review ESAt.

Additionally, the National Panel of Assessors (NPA) conducts its own assessments. These assessments are associated with the needs of people with disability in the workplace and include:

- Supported Wage System (SWS) Assessment,
- Ongoing Support (OSA) Assessment and,
- Workplace Modifications (WMS) Assessment services.

The NPA process needs to be reviewed to curb the number of reassessments that occur in the workplace. Providers already have a very good knowledge of disability

¹⁰ JobAccess 2021, *Eligibility*, Australian Government, <<https://www.jobaccess.gov.au/people-with-disability/eligibility>>



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type and the impact on employment. This measure could improve the timeliness of ESAts.

DEA also recommends that ESAt Assessors gain a greater knowledge of disability types, to ensure participants understand relevant services available in their local area.

The Department should also revisit previous reviews of the assessment system. The BCG review recommended reducing the number of assessments (evaluations) and further automating assessment systems as a means of reducing flow into DES as well as cost.

As mentioned, benchmarking should also be reconsidered. If the system could make recommendations to DES, ESS, DMS or Enhanced Services without benchmarking, much time and effort would be saved.

The BCG ESAt review found that 26-week employment rates were more often achieved in DES-ESS and DES-DMS programs than in the jobactive Stream C (see page 63). The review includes a timeline for implementation (see Page 86), however, DEA has not seen a response to this from DSS and does not know if the recommendations will be implemented¹¹.

Any future assessment model needs to consider participant choice and autonomy. A participant should be able to choose a provider before assessment occurs. This will make it easier for all potential participants, including NDIS participants, to access the DES. If a potential participant has an approved NDIS plan, DSS should consider they be automatically eligible for the DES without an ESAt. However, we note that any change be coupled with very clear/improved rules around the NDIS/DES interface, and a recognition that NDIS participants may still need NDIS supports to wrap around DES supports (and to build their capacity to be able to benefit from DES).

DEA would like further research into assessment tools in social services settings and greater separation between Centrelink assessments and provider assessments. ESAts should focus on eligibility and appropriate streaming to program, rather than interventions. A simplification of benchmark hours or reducing the number of categories, would enhance employer engagement and would improve employment outcomes for people with disability.

¹¹ Boston Consulting Group 2020, *2020 ESAt Review*, review, The Department of Social Services, <https://www.dss.gov.au/sites/default/files/documents/05_2021/residential-aged-care-providers-registration-requirements-accessible.pdf>



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

Topic 3

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

DEA sees many positives in the current DES program, but recognises improvements can be made. For instance, DEA has reservations around the new digital servicing component of the New Employment Services Model for DES-eligible participants.

DEA endorses the broader Australian Government Digital Transformation Strategy with the caveat that people with disability are not left behind. The new disability employment support program should include reference to how the Digital Transformation Strategy will support people with disability, especially in terms of accessibility.

Furthermore, evaluation of the upcoming New Employment Services Model (NESM)¹² needs to be carried out to ascertain how effective it is at assisting people with disability into meaningful employment.

There is an important role in the current and future DES program for ongoing support. Ongoing support should be reviewed and simplified to ensure DES providers can adequately support people with disability and their employers throughout their employment journey.

DEA recommends streamlining different levels of ongoing support and removing 'flexible' ongoing support as an option. The current moderate and high-level support fixed payment should continue. There also needs to be an allowance for fluctuation in support — to allow for changes in a client's work or life.

DEA would also like to see a methodology that recognises that some clients need minimal ongoing support, but at other times may require several hours a week due to changes at work or other circumstances. Providers should be incentivised to respond to changes in levels of support.

Furthermore, job seekers need a better understanding of what services they are being referred to and what is being offered, so they can make the best choices for themselves.

DEA would also like DSS to review and broaden the definition of employment, around outcome payments for all employment-related programs and for the expansion of the DES Eligible School Leavers program eligibility criteria.

¹² Department of Social Services, *Disability Employment Strategy*, Disability and Carers, <<https://www.dss.gov.au/disability-and-carers/disability-employment-strategy>>



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The Social Security Act and Mutual Obligation¹³ requirements also need amendment. Providers must be able to focus on placing people in meaningful work, rather than administering the Social Security Act. DEA recommends that the administration of Mutual Obligation returns to Services Australia so that services can prepare people with disability for work.

DEA recommends that DSS looks at creating a KPI that is focused on meeting the job goals of participants, rather than using the current speed-to-placement KPI.

Education and training should also be instilled in the New Disability Employment Support program to prepare people with disability for work. DEA is critical of changes made in August 2020 to the performance framework, where Certificate 3 education and training completions were removed due to a perceived overuse¹⁴. DEA recommends the DES outcome policy be reviewed, so that payments are made on completion of education and training courses, and when employment is achieved.

DES services are also vital in addressing barriers to employment and connecting clients to services, such as housing, health and advocacy. DES is a critical support in connecting participants to services that address other barriers to employment. Most DES providers have built networks of support services and programs around their DES participants. Stable housing, for instance, is a key component to finding and keeping a job.

In regards to mature-aged participants, the Department of Education, Skills and Employment has developed some strategies to assist them into employment. DESE defines mature aged as over 45 years of age.¹⁵ DEA recommends that DSS look at New Disability Employment Support Program specific options for mature aged people with disability.

DEA supports the need for an education campaign with employers around mature-aged job seekers. Better partnerships with employers are needed to encourage employment opportunities, links between voluntary work and re-training, and pathways to employment.

DEA also recommends a review of the risk adjusted outcome payment model and a re-examination of how funding relates to different disability cohorts and age groups, as well as the cost of preparing and supporting these groups for work.

¹³ Social Security Guide 2020, 1.1.M.160 *Mutual obligation requirements*, Australian Government, <<https://guides.dss.gov.au/guide-social-security-law/1/1/m/160#:~:text=Definition.%20Mutual%20obligation%20requirements%2C%20which%20are%20referred%20to,unless%20they%20have%20an%20exemption%20%28%203.11.5%20%29>>>

¹⁴ Disability Employment Services Grant Agreement (Direction and Advice No. 7) (Star Ratings for Education Outcomes) 2020

¹⁵ Department of Education, Skills and Employment 2021, *Mature Age Hub*, Australian Government, <<https://www.dese.gov.au/mature-age-hub>>



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6

What employment
services and supports
would most help
young people?

Topic 4

What employment services and supports would most help young people?

A 2021 European Union investigative report into disability employment across its member states highlighted that there is, 'no one-size-fits-all solution' in terms of support for young people with disability. Instead, support should be client-centred, holistic and integrated.¹⁶

In light of this, DEA recommends the following:

- DSS and government should review policy and current systems to allow DES to work more directly with young people with disability in schools, families, and communities.
- DSS should foster an evidence-based understanding of DES provider best practice, and allow this to guide the support provided to young people with disability seeking employment.
- DSS should engage in evidence-based research, and should apply it to maintain and increase above-average employment outcomes in DES for people with intellectual disability, autism and development disability.
- DSS should compare findings from the Year 13 survey with DES provider practice and evidence-based research (point 3), to improve existing supports, assistance, engagement and outcomes.

Australia compares favourably to many European countries in its provision of services for people with disability seeking employment. Job seekers are offered different levels of support with employment, dependant on their needs. It should be noted that no other country in the world provides a nationwide specialist disability employment service.

Specialist services are important for young people beginning their employment journey, especially young women. Data shows the DES Eligible School Leaver (ESL) population generally do not receive income support payments, and are mostly female with intellectual, learning and autistic disabilities.

Ten years ago, the ESL population in DES was three times higher than it currently is, with better employment outcomes. This poses the questions: What has happened? And, how do we improve employment opportunities for ESLs?

DES has historically helped young people find sustainable employment. However, in 2012, the former Department of Education, Employment and Workplace Relations (DEEWR) made a policy change that substantially reduced the number of young people, their families and schools that DES providers could work with.

¹⁶ (Eurofound (2021), Disability and labour market integration: Policy trends and support in EU Member States, Publications Office of the European Union, Luxembourg, pg. 71



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In 2018, the Risk Adjusted payment Model (RAPM) reduced the number of young people with disability accessing DES again.¹⁷

Key reference group members, from disability representatives to employer representatives to provider peaks, raised concerns about the RAPM model — especially its negative impact on young people with disability, particularly those with intellectual disability and autism.

In the October 2020 federal budget, those who were voluntary DES participants (not on pension or other social service payments) were directed away from DES to jobactive. This was initiated without consultation. Voluntary DES participants are generally young people whose parents have not sought DSP or other income support payments for their dependents due to income and assets.

DES providers have offered the most effective means for young people with disability to develop their employment skills and to gain sustainable paid employment. Headspace is using the Individual Placements and Support (IPS) program. The School Leaver Employment Supports (SLES) is another example.

It's worth considering what the DSS sponsored Year 13 survey¹⁸ found on the experiences of young people with disability as they transitioned from school to work. Parents of young people with disability identified, 'access to a disability employment expert as the top requirement they needed to support their child's career development'.

What is most revealing about the survey's findings is that they describe what DES providers were already doing with much larger numbers of young people with disability, their families, communities and schools, prior to departmental policy changes.

DES providers continue to work with young people with disability. DES providers are achieving noticeably higher employment outcomes for this population than the DES program overall, despite the 2012 and 2018 policy changes.

¹⁷ Department of Social Services 2018, *Disability Employment Services 2018 - Risk adjusted funding model*, Australian Government, <https://www.dss.gov.au/sites/default/files/documents/06_2018/des_risk_adjusted_funding_model.pdf>

¹⁸ Department of Social Services 2021, *Disability and Career Advice Survey Report*, Australian Government, <<https://www.dss.gov.au/disability-and-career-advice-survey-report>>



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

Topic 5

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

Despite the availability of tools, resources and research, there has not been any real shift in the percentages of employers actively engaged in employing people with disability over the past 30 years. Employers are not necessarily against employing people with disability, although, over 40% of employers don't see employing people with disability as a priority¹⁹. Broadly speaking, employers don't know how to attract, employ and retain people with disability, or they are concerned with the potential costs and legalities involved.

DEA believes the key to meeting this challenge, based on key research reports, is to:

- Engage employers around existing perceptions.
- Develop employer confidence and capability to employ.
- Offer clear and consistent support in the employment of people with disability.
- Encourage employers to tell their stories and to use best practice.

DEA would like to see a national agreement and a working group tasked with increasing the number of employers who know what DES is and a lifting of the ratio of employers who engage with the new Disability Employment Support Model.

DEA also recommends the removal of participant benchmarks as an indicator from the New Disability Employment Support Model. Employers do not understand this system, which impacts on the types of jobseekers marketed to employers.

Web-based resources, information and support programs should also be promoted to potential employers. The key web-based resource for disability employment stakeholders is JobAccess. DSS conducted an evaluation of JobAccess in 2018/19 and found it was highly valued by target audiences.

Users most valued the Employment Assistance Fund (88%) and the Information and Advice Service (87%), while employers valued the National Disability Recruitment Coordinator (76%), and employment service providers valued the website (76%)²⁰

DEA also recommends that the Federal Government conduct a major campaign to increase awareness of the supports available through Disability Employment Services, JobAccess, the Employee Assistance Fund and the National Disability Recruitment Coordinator. The new Disability Gateway is an effective way to direct potential employers to JobAccess.

¹⁹ <https://www.comcare.gov.au/about/forms-publications/documents/publications/research/employer-mobilisation-research-report.pdf>

²⁰ Colmar Brunton 2016, *Evaluation of JobAccess Service Report*, Department of Social Services, <https://www.dss.gov.au/sites/default/files/documents/06_2020/evaluation-jobaccess-services-july-2019.pdf>



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There are a raft of tools, resources and research aimed at helping build employers' awareness and confidence in employing people with disability.

The following are examples:

- Comcare research in Australia — Mobilising employers to employ people with work disability project²¹.
- Kessler Foundation research in the US — Employment and Disability Study²².
- The Council of Small Business Organisations Australia (COSBOA) — Employability Project - Employing people with a disability in small business. What would make it easier?²³

Relevant research should be translated into fact sheets, guidelines, ready to use actions and supports, and made readily available to potential employers.

Organisations such as the Australian Network on Disability (AND), Australian HR Institute (AHRI), the Australian Chamber of Commerce and Industry (ACCI), Business Council of Australia (BCA) and the Australian Human Rights Commission (AHRC) have a strong interest in improving employer engagement with disability as well.

Central to this topic is the capability of DES providers in promoting disability employment. DES providers utilise employer support initiatives on a daily basis, working with tens of thousands of employers. DES providers also practice what they preach. The DEA's 2021 Members Survey indicated that around 15% of people employed by DES providers identify as having a disability²⁴.

Finally, DEA recommends an annual Australian Government initiated disability employment summit for employers and people with disability. A summit would aid the review and progress of the new Disability Employment Support Model and of the National Disability Employment Strategy (National Disability Strategy 2021-31²⁵).

²¹ Comcare 2021, *Mobilising employers to employ people with work disability project*, Australian Government, <<https://www.comcare.gov.au/safe-healthy-work/research-evidence/research-projects/mobilising-employers-disability-research-project>>

²² Kessler Foundation n.d, *Employment and Disability Study*, Kessler Foundation, <<https://kesslerfoundation.org/research/center-employment-and-disability-research>>

²³ COSBOA, *Employing people with disability in small business - what would make it easier?*, Employability Project, COSBOA, < <https://www.cosboa.org.au/employability-project>>

²⁴ Disability Employment Australia 2021, *DEA's 2021 Members Survey*, <https://disabilityemployment.org.au/file/262b80e5ab39fc2e2fdc99b3f8f1c82d85f722d0/dea-membership-infographic-2021_final.pdf>

²⁵ Department of Social Services, *Disability Employment Strategy*,



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8

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

Topic 6

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

In reviewing and improving the current DES program, DSS has nominated seven program redesign principles. DSS recommends that the reformed DES program centres on these principles.

Current Job Plan mutual obligation requirements are not compatible with the proposed principles or with evidence-based, person-centred service delivery approaches. In fact, as they stand, these requirements obstruct at least four of the seven principles.

The need for providers, participants, and employers to work together to achieve better employment outcomes should take precedence over compliance requirements.

While acknowledging the role of mutual obligation, DEA recommends that:

1. Responsibility for mutual obligation oversight is removed from DES providers and placed with Services Australia.
2. Mutual obligation is completely removed from Job Plans, or is reduced to a basic question such as, '*has the participant's Job Plan been completed, reviewed or updated? Yes or No*'.
3. DSS monitors Job Plans via its quarterly quality assurance activities.

Mutual obligation as a compliance mechanism in a Job Plan is counterproductive for people with disability, their employers and ultimately the Government. A Job Plan outlines the activities a job seeker must undertake to satisfy requirements under social security law.

On behalf of the Government, DES providers are currently charged with ensuring that job seekers comply with the mutual obligations laid out in their Job Plan.

Job Plans contradict DES program redesign *Principle 7: Participant-centric design and delivery*, because they erode trust, creating a barrier between the provider and their client.

Instead of compliance, best practice disability employment should focus on promoting inclusive and individual plans that help providers support people with disability into suitable and meaningful employment.

Mutual obligation requirements are also needlessly bureaucratic, being referenced an astounding 173 times in the 199-page *DES 2018 Grant Agreement* that providers must sign to operate as a DES provider.²⁶

²⁶Department of Social Services 2018, *Disability Employment Services Grant Agreement*, Australian Government, <https://www.dss.gov.au/sites/default/files/documents/11_2021/des-grant-agreement.pdf>



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Additionally, a 2018 DEA members survey²⁷ revealed that 80% of respondents completed not one, but two separate Job Plans. The first was a generic online government plan to satisfy mutual obligation requirements, which offered a drop-down menu of prescribed options only.

The second was a provider Job Plan tailored to the client's specific choices and needs, in line with DES program redesign Principle 6.

If adopted, the latter approach will continue to strengthen clients' self-esteem, self-reliance and emotional well-being, thus enhancing their employment prospects.

Although compliance mechanisms *are* an important part of the government's social security system, mutual obligation requirements must be removed from Job Plans and updated to align with DES program redesign principles.

²⁷ Disability Employment Australia, *2018 Member Survey*



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9

How can funding
arrangements incentivise
good work outcomes?

Topic 7

How can funding arrangements incentivise good work outcomes?

The outcome payment model for any reformed disability employment model should reward providers for employment that directly meets the employment goals of a participant.

The current DES model includes service, outcome, and ongoing support fees. For some providers, a reliance on service fees during poor labour market conditions, such as those associated with the pandemic, has meant a focus on preparing participants for work in the hope that local labour market conditions will improve.

In 2018, DES reforms reset the service/outcome fee ratio by increasing the value in that ratio of outcome fees. The objective was that higher outcomes fees would act as an incentive for providers. However, higher outcome fees can fail to recognise the work required to get a participant job-ready and may lead to participants being placed prematurely and ineffectively into employment.

The 5-level risk adjusted outcome payment model (RAPM) is currently used to determine outcome payments based on the likelihood of a DES participant achieving an employment outcome. This model was not trialled prior to its implementation. DEA recommends the RAPM is replaced with a simplified model that is trialled and assessed prior to full implementation.

In terms of service fees, there must be a recognition of the time it takes to prepare a person with disability for employment. Some participants require more preparation than others. DEA wants to see a service fee paid for preparation for work readiness. The initial service fee should be higher, with a tapered rate, the longer a client is in the employment assistance phase.

Although the intention of the current 52-week outcome is good, it creates extra work for providers in terms of outcome tracking. DEA recommends a return to the 52-week employment indicator, as per the previous contract. Outcome fees should also be consolidated, rather than being distributed incrementally over 52 weeks.

The performance framework should be altered to recognise quality of service support and assistance in contrast to quantity of employment outcomes achieved (although this is important too). Other measures for quality in terms of preparing participants for work might encompass the percentage of job seekers and workers able to take control of their lives in relation to employment. Even the new NESM model makes progress payments acknowledging the work required to prepare a client for work.

Ann Nevile and Brendan Long (2016), in their research paper, 'Beyond the Stars: a new performance management approach for disability employment services'²⁸ note

²⁸ Nevile, A, Long, B 2016, *Beyond the Stars: a new performance management approach for disability employment services*, National Disability Services, <<https://www.nds.org.au/policy/beyond-the-stars-exploring-des-provider-support>>



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alternative measures for quality in the DES program in terms of preparing participants for work. They recommend that data is collected around:

1. The percentage of job seekers and workers who feel able to take control of their lives in relation to seeking, gaining and maintaining work.
2. The percentage of job seekers and workers who feel confident about their abilities in relation to seeking, gaining and maintaining work

The current DES model rewards 'speed to placement'. This means that there are greater financial incentives for providers to place the most 'employable' people first.

Rather than rewarding speed to placement, the funding agreement could provide bonus payments for placing job seekers into jobs that align with their interests, qualifications, and capabilities. Job Plans would need to record participants goals for this to be effective (see Topic 6). A mechanism for recording participant data on the quality of service should be developed. This would sit comfortably with DES KPI 3, Quality.

To improve outcome effectiveness, participant groups with poor outcome rates should be able to trial other service delivery and work experience models, (for example, a paid work trial for six months).

New outcome policy should also consider the growth of self-employment and the gig economy (Uber driving, food delivery, air tasker etc) in Australia, as well as the increase in contract and casual employment. DES policy related to definitions and delineations of 'employment' need to be reviewed to better reflect and recognise employment and labour markets contextually and relative to how employers, industries and sectors are growing and changing.

Providers should be eligible for extension to contracts if they meet outcome and quality of service targets. DEA recommends that ongoing support fees should be maintained and increased (See Topic 3).



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How do we drive
high quality services
and supports?

Topic 8

How do we drive high quality services and supports?

DEA supports the need for an efficient and competitive provider market, which creates more choices, and allows participants and employers more control.

A competitive market model is in line with the Harper Competition Policy Review, Recommendation 2 — ‘*Each Australian government should adopt choice and competition principles in the domain of human services,*’ and ‘*user choice should be placed at the heart of service delivery.*’²⁹

Overseas experience also tells us that a competitive marketplace and individual choice allows more ownership for the individual and improves employment outcomes.

The current DES market is made up of a panel of providers per Employment Service Area (ESA). The purchasing process for the 2018 DES Funding Deed and the Invitation to Treat process for 3-star plus providers, allowed many existing providers to stay in the DES market. These provider contracts continue to perform better than average, three and a half years into the DES 2018 program.

Many providers have been able to expand to new areas across Australia following this purchasing process. In some ESAs there are now over 20 providers. This means that participants have many services to choose from.

DSS informed the sector in 2017/2018 that panel reviews would occur. To date, DSS has not conducted a panel review and therefore panellists with poor performance contracts have not been reviewed as fit for purpose for the DES program objectives.

Panel reviews should be conducted on a regular basis for the New Disability Employment Supports Model. Performance should measure service quality and not just employment outcomes, as a reform to the current framework.

In terms of other quality assurance measures, DES providers must comply with the Disability Services Standards and are assessed independently and annually against these.

DEA would like to see performance under the new disability employment model measured via a combination of feedback, relative labour market placement and employment outcomes achieved. The Department should also regularly assess how it can reduce bureaucratic barriers for providers. And, there should be a mechanism for collecting participant feedback. The sector, through its Peaks and nominated delegates could work with DSS to balance a regulatory role of the department with

²⁹ Harper Review 2015, *Harper Competition Policy Review*, Australian Competition Law, <<https://www.australiancompetitionlaw.info/reports/harper/final-recommendations>>



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compliance requirements. By working together with a shared goal, we can expect to improve the quality of services and supports.

The BCG review of the DES program makes recommendations about this, in the form of a contract or a license arrangement (allowing a provider to sit on a panel for a period of time). Their licence can be activated at the beginning of the process or during it.

The BCG states that, 'providers that meet certain conditions would be formally permitted to provide services, with an expectation that market exit is easier than under contractual or grant arrangements'³⁰. A key condition must be *quality* to ensure alignment between quality service provision and effectiveness and efficiency measures.

DEA endorse the current level of DES workforce capability and recognises the need for evidence based continual improvement. DES staff require a set of skills commensurate, separate and more enhanced than their Jobactive counterparts. DES providers work within their purpose, mission and strategic objectives to ensure their staff are trained and skilled to deliver DES supports and assistance. DEA agrees that the future of DES must conceptually engage developing its workforce based on formal qualification.

DEA supports providers to develop a skills training agenda and a course for DES staff. DEA envisages this as a ten-year project, which begins in synch with the new DES.

There are already many practices that differentiates a specialist service (DES) from a generalist offering (jobactive). Specialist services should be evaluated for effectiveness. Recently the four provider peaks completed a short sample survey of DES good practice. Although the results were impressive, we recommend developing an independent longitudinal active operational research project that monitors DES practice, identifies best practice and incorporates best practice into DES on an ongoing basis.

³⁰ Boston Consulting Group 2020, *Mid-term Review of the Disability Employment Services (DES) Program*, pg. 148



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How do we
measure success?

Topic 9

How do we measure success?

DEA agrees with general statements made in the Consultation paper on this topic. Timely information is key to informed participant and employer choice. However, regularly updated transparent information on factors such as DES providers service quality, cohort specialisation, performance, is currently lacking.

A well-designed program performance framework is a vital reform measure. Discussions with DSS and the reference group have looked at elements that might feature in a reformed performance framework. DEA sees the updated performance framework as central to how success is measured in the next iteration of DES. The performance framework must be 'public facing', allowing transparent ongoing monitoring and review of DES.

An effective performance framework will also help the Government to understand if the program is meeting its objectives and will boost public accountability. It will also assist providers in developing their business models — aligning delivery with program objectives and issuing reliable information.

So, what will success look like for its different stakeholders?

* For the purpose of this topic, a **participant** is a person with a disability, injury or health condition who participates in DES services.

People with disability

The 2018 DES program's main objective is to help participants secure and maintain sustainable employment in the open labour market. And, to deliver disability employment services that foster social inclusion and improve the nation's productive capacity via the employment of people with disability.

The DES Code of Practice³¹, Service Guarantee³² and National Standards for Disability Services,³³ underpins what participants should expect of their DES provider. It recognises that successful service assistance and support is flexible,

³¹ JobAccess 2018, *DES Code of Practice*, Department of Social Services, <<https://www.jobaccess.gov.au/downloads/des-code-practice>>

³² Department of Social Services, *Disability Employment Services - Service Guarantee*, Australian Government, <https://www.dss.gov.au/sites/default/files/documents/05_2021/des-service-guarantee-linked.pdf>

³³ Department of Social Services 2013, *National Standards for Disability Services*, Australian Government, <https://www.dss.gov.au/sites/default/files/documents/05_2021/nsdsfullversion-may-2021.pdf>



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individualised and emphasises a person-centred approach. Service providers should understand their participants' disability, injury and/or health condition. This expectation should be reinstated clearly in the DES 2023.

A person-centred approach requires DES provider staff to have a satisfactory knowledge of the effects of medical conditions on participants' physical and mental health, and what this means in terms of their capacity to sustain particular types of employment. It will also guide the support participants require.

Participants should be able to trust that their DES provider has good working relationships with a range of suitable employers. Participants should be able to gauge a provider's capability, as well as how potential employers might feel about employing someone with a disability.

Most participants have a reasonable understanding of the benefits of employment and value information, resources, services and advice. DES providers should provide relevant resources, as well as access to practical, work-related courses, certificates and licenses. Work-related training helps participants develop connections and create opportunities with potential employers.

While it's not an objective of the current DES program, we encourage DSS to add an objective to DES 2023 which allows participants to pursue employment that progresses their desired career. This may require on-going support when participants begin a new job or when their job duties change.

DES 2018 included an opt-in arrangement for participants, which allowed them to return to their provider when they needed support or assistance during employment. DES 2023 should continue this arrangement.

The community

For over 30 years, DES providers have worked and collaborated with local community, disability and mental health services who offer non-vocational activities. These activities help build participants' confidence and capacity to find and keep a job. DES providers engage a holistic approach to support and assist participants, and this is best reflected through their community connections. DES 2023 should continue to support these initiatives as examples of best practice.

Employers

Employers should be able to expect a candidate (or a pool of candidates) that has the necessary skills, experience, and attitude for the role. Employers generally agree that success means finding the right candidate for the job. What constitutes the 'right' candidate varies, depending on the size and nature of the business.



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Regardless of their definition of the 'right' candidate, employers are unhappy when unmotivated candidates apply for positions, simply because they need to meet mutual obligation requirements. Success, for employers, means working with DES providers that have a good understanding of their organisation's particular needs. For some employers, this means developing good relationships with service providers in their local area.

It is also clear that employers are not interested in DES compliance administrative requirements, such as confirming job seeker attendance. These requirements act as a barrier to employment for people with disability. DES 2023 should incorporate less employer compliance administration. This administration should not be shifted to DES providers either.

The next iteration of DES should consider the range of existing employer engagement models DES providers use. The lack of understanding of current DES provider and employer relationships is problematic.

The next DES must be based on what the current DES does successfully. DES providers have supported hundreds of thousands of participants into sustainable jobs during the last 10 years. It's time we listened to employers who employ people with disability and use this information along with recent employer research (see Topic 5 response) to enhance our understanding.

DES providers

The proposed DES 2023 must have clear and transparent objectives and performance management criteria, which will enable DES providers to monitor their own performance, identify actions that will improve their performance and implement requisite actions.

DES 2023 should raise the expected performance of KPI 3 (Quality) to the same level as KPI 1&2 (Efficiency and Effectiveness).

It is the responsibility of DES providers to place participants into meaningful employment that does not exacerbate existing physical and/or mental barriers. They should also ensure on-going support to those who need it. Providers should be aware of the ramifications for those who fall short of DES quality expectations.

In unity with DES providers, DSS should structure its regulatory oversight responsibilities around the Deed, Code of Practice, Service Guarantee and the NSDS. DES providers would work within this context, which emphasises quality service and a person-centred approach.



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Government

Leading into DES 2018, the Government wanted more participants, more providers, more competition and more choice and control for participants. It valued education and training for DES participants to the extent that education outcome fees matched employment outcome fees and performance scores.

Speaking at the DEA Leaders Forum in November 2019, Minister Ruston acknowledged the introduction of, 'essential reforms to improve employment outcomes for people with disability' and praised the, 'encouraging numbers' of people with disability, injury and health conditions that were coming through the DES.³⁴

If government wants to further promote an increase in the percentage of DES participants in employment, it must clearly state current employment percentages across all ESAs, States and Territories, disability cohorts and other relevant demographics, like age.

In terms of a performance management framework, the current model is fit for the current objectives. However, reforms to DES 2023 will require a reworked performance framework — including a funding formula that does not inadvertently incentivise practice such as managing participant lists. Government must design a program, with robust monitoring that restricts such approaches.

There is considerable overlap between what success looks like for people with disability, employers, DES providers and government. People with disability, DES providers and government want more people with disability to be able to enjoy the benefits of stable employment. While employers are looking for suitable candidates that will make a significant contribution to their business over many years. A well-designed program quality/performance framework will aid these objectives.

Invested stakeholders will define success in terms of both process and outcomes, with a focus on quality and efficacy. A critical improvement on the current and previous iterations of DES would include regularly updated data being made publicly accessible. This data should reveal what DES providers and the program are delivering.

The current DES program, Code of Practice, states the Government will evaluate and share best practice to enable improvement in the delivery of DES 2023. To support quality and efficacy, DEA and fellow provider peak bodies engaged data strategy delivery agency, 89 Degrees East, to conduct a sample survey on DES good practice³⁵

³⁴ Ruston, A 2019, *Disability Employment Australia National Leader's Forum*, speech, Department of Social Services, <<https://ministers.dss.gov.au/speeches/5301>>

³⁵ 89 Degrees East, DES Good Practice (2021)



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The survey revealed how DES providers work with their participants, communities, employers and related services to place many people with disability, injury or health conditions into meaningful employment. DSS should draw on this to establish a research centre, which will provide demonstrable, evidence-based examples of best practice for continuous improvement in the delivery of DES, as per the government's DES Code of Practice commitment.

Broadening the range and variety of data sets available to engage should be core to future reforms. These reforms should be trialled with data sets applied during these trials. By participating in the collection of the data, DES participants, employers and service providers will help gather, measure and report on the performance of the updated program.

Here are some examples of key data that should be considered when determining success and the continuous improvement of the program.

Information about outcomes

1. Longitudinal data on the number of people with disability who are in employment and cross-set data on, but not limited to, cohorts, age, gender, regions, industries, employer size and employment aligned with the Federal Government Skills agenda.
2. Data on employment duration and cross-set data on, but not limited to, age, gender, regions, industries, employer size and employment aligned with the Skills agenda.

Information about process

3. Data from ongoing employer engagement surveys, which centres on DES agencies' levels of satisfaction with the service provided as well as:
 - the suitability of applicants referred by DES providers,
 - the extent to which employers believe the DES providers they engage have a good understanding of their business and its needs,
 - the extent to which DES agencies provide accurate information about potential candidates' work history, experience, skills, barriers and needs (subject to an individual's privacy and decision to disclose),
 - the extent to which DES providers demonstrate a commitment to quality services and continuous improvement via employer feedback,
 - the level of 'red tape' around sourcing vacancies with candidates referred by DES agencies, and
 - the level of 'red tape' around DES providers' participants employment.



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4. Data from ongoing job seeker/employee satisfaction surveys, which reveals the overall level of job seeker satisfaction with their DES provider as well as:

- the extent to which job seekers believe their DES provider has a good understanding of their employment goals and possible pathways to achieve these goals,
- the level of satisfaction with on-going support provided by DES agencies, and
- the level of satisfaction with their employment.

The NDIS Practice Standards and Quality Indicators as defined in the *National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018*, Independence and informed choice chapter (pg. 6),³⁶ should inform our thinking on participant informed choice for DES 2023. It is reprinted in full here:

Outcome: Each participant is supported by the provider to make informed choices, exercise control and maximise their independence relating to the supports provided.

To achieve this outcome, the following indicators should be demonstrated:

- *“Active decision-making and individual choice are supported for each participant, including the timely provision of information using the language, mode of communication and terms that the participant is most likely to understand.*
- *Each participant’s right to the dignity of risk in decision-making is supported. When needed, each participant is supported to make informed choices about the benefits and risks of the options under consideration.*
- *Each participant’s autonomy is respected, including their right to intimacy and sexual expression.*
- *Each participant has sufficient time to consider and review their options and seek advice if required, at any stage of support provision, including assessment, planning, provision, review and exit. Each participant’s right to access an advocate (including an independent advocate) of their choosing is supported, as is their right to have the advocate present.”*

DES providers are quality assured tested against the National Standards for Disability Services on an annual basis.

The DES Code of Practice and Service Guarantee, which DES providers are signatory to, *implies* an expectation of ‘informed choice’. However, the NDIS Practice Standards and Quality Indicators explanation of a participant’s ‘informed choice’ is much clearer.

³⁶ Head, G 2018, *National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018*, Australian Government, <<https://static1.squarespace.com/static/57c65af5cd0f68b1295663dc/t/5b00d7c1562fa7b754c4ae8b/1526781898720/Practice+Standards+-+F2018L00631.pdf>>



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The updated DES should incorporate similar clarity around the term. The role of the DES Quality Assurance of the National Standards for Disability Services and the Code of Practice and Service Guarantee should also be more prominent when measuring the successful DES 2023.

Many DES providers already promote and market their employment engagement success, which is helpful. But more publicly available data on how DES and its providers are performing would be useful to employers.

DES providers have conducted independent research on employer engagement. These findings would further help employers make informed choices when engaging a person with disability. DEA can assist DSS to source this information, if needed.

Additionally, DSS should host a series of roundtables featuring employers that have worked with DES providers over the previous five to ten years. These roundtables would help determine the interests of various sized employers, industries and sectors, and whether city, regional or State and Territory factors are relevant.

Employers may also want more transparency around how providers work. For instance, how many DES provider staff are responsible for employer engagement in a provider organisation and who is the single point of contact. They may want to know what employer engagement staff do and how the agency as a whole can assist employers.

Determining where all this information will be kept and how it might be made available will be dependent on the framework that DSS develops to measure the success of DES 2023.

Relevant information and data should be publicly available via both DSS (Job Access and the Disability Gateway) and DES providers' online platforms. Information should be placed in a visible position on government and stakeholder websites. It should also be made available via a *find a provider* button on the DSS website, allowing employers and job seekers to search for suitable providers.



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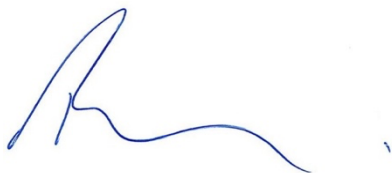
Conclusion

Conclusion

Finally, DEA urges the government to consider the *UN CRPD, Article 8: Awareness-raising*³⁷ as it relates to employment for people with disability. Awareness-raising for employers and the wider community to strive to achieve the National Disability Employment Strategy goal of closing the workforce participation gap between people with disability and people without. Awareness raising will significantly increase the likelihood of employment opportunities for people with disability and success for DES 2023.

DEA trusts that information provided in our response can be utilised by DSS to “understand what is important to consider when designing the new disability employment support program”.

We welcome DSS to contact us to discuss any points or ideas we have raised in our response.



Rick Kane
CEO
Disability Employment Australia



David Best
Policy Manager
Disability Employment Australia

DEA is deeply grateful to a variety of people who have assisted us with our response. Your ideas have been considered in line with critical factors we have contemplated and incorporated into arguments and recommendations

³⁷ United Nations n.d, *Article 8 – Awareness-raising*, Department of Economic and Social Affairs, Disability, <<https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-8-awareness-raising.html>>



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Represent



Support



Resource