



Serving our community.
Sharing our culture.

New Disability Employment Support Model Consultation 2022

ABOUT US

Established in 1903 (Deaf Services Limited) and 1913 (The Deaf Society) respectively, Deaf Connect, is a not-for-profit organisation supporting Deaf, Deafblind, and hard of hearing communities across the country, with a focus on community and empowerment. Our mission is standing with the Deaf community, building capacity, and influencing social change. Deaf Connect offers a whole life range of services to support the community including early intervention and therapy services, accredited Auslan courses and community classes, Auslan translation and interpreting services, lifestyle support services, community engagement, information and referral services, aged care support and socialisation services. Deaf Connect are the largest Deaf, Deafblind, and hard of hearing specialist service provider in Australia with over 225 years of collective experience delivering quality services to the community across Australia in Auslan. Deaf Connect are also the largest employer of Deaf and hard of hearing people in Australia.

We would like to thank the Department of Social Services for the opportunity to participate in this consultation.

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FACTS

- Auslan (Australian Sign Language) is the sign language of the Australian Deaf community.
- Auslan (Australian Sign Language) is an accepted communication method recognised by the National Accreditation Authority for Translators and Interpreters.
- Auslan is recognised as a community language¹ (Dawkins, 1991).
- One in Six Australian have some form of hearing loss, with that number projected to increase to one in four by 2050. Hearing loss is the 2nd most prevalent national health issue yet remains the 8th national funding priority² (Access Economics, 'Listen Hear', 2006).

DEFINITIONS

Deaf

The term "Deaf" refers to those who use a sign language as their primary language. Deaf people are more likely to have been born deaf or to have acquired a hearing loss early in life. This group is relatively small, but not insignificant; there are approximately 30,000 Deaf Auslan users in Australia. Deaf people typically tend to acquire sign language as their primary means of communication in addition to the written or spoken language of the wider community. They are not necessarily fluent in written English and proficiency should not be assumed.

Deafblind

Deafblindness is a unique and isolating sensory disability resulting from the combination of both a hearing and vision loss or impairment which significantly affects communication, socialisation

¹ Dawkins, J (1991). Australia's Language: The Australian Language and Literacy Policy. Australian Government Printing Service: Canberra

² <https://catalogue.nla.gov.au/Record/3721645>

mobility and daily living. There are two distinct cultural groups within the deafblind community. The first group are born blind and lose their hearing as adults. They tend to continue to use speech as their main communication and have a variety of hearing devices to help them to communicate. The second group are born deaf and lose their sight as adults. This group are culturally deaf and use sign language to communicate³.

Hard of hearing

The term “hard of hearing” is usually used to refer to those who use English rather than a signed language as their primary means of communication. Most people with a hearing loss (estimated at one in six Australians), belong to this group. People with acquired hearing loss will usually continue accessing information and interacting with those around them in English, whether spoken or written, and are well served by assistive technologies such as hearing aids, hearing loops, and captions.

Auslan

Auslan (Australian Sign Language) is the signed language used by the Deaf Community in Australia and is the primary and preferred language of those who identify with the Deaf community. It is historically related to British Sign Language, as is New Zealand Sign Language, and has been influenced, to a lesser extent, by Irish Sign Language and American Sign Language. It is not a signed form of English, rather, it is a language in its own right with its own unique grammatical structures, which are different to that of English. As with any foreign language, many years of study are needed to acquire fluency.

³ <https://www.deafblind.org.au/deafblind-information/deafblindness-in-depth/>

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

1.1. Who should be able to access a disability employment support program?

All participants with a disability should be able to access the disability employment program, regardless of NDIS and income support payment eligibility. Participants with disability specific support requirements, such as Deaf, Deafblind, and hard of hearing people, must have access to culturally and linguistically appropriate services. Unfortunately, the availability of specialist providers who understand the needs of Deaf, Deafblind, and hard of hearing people is limited and unable to meet current demand. Services should be made available remotely where there are none available locally; this would involve relaxing the initial meeting rules.

1.2. Should 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?

The program in its current form defines success as meeting benchmark hours in conventional employment within prescribed rules and timeframes that can be difficult to convey to participants and employers alike. Whilst the suggestion that a future program should include flexible employment pathways, the program is centred on meeting mutual obligation requirements for those in receipt of income support payments. Much of a provider's time is spent monitoring adherence to compliance and other administrative burdens, rather than undertaking meaningful capacity building activities, particularly with non-compellable participants. A future disability employment support program requires less focus on punitive measures and compliance, and instead should encourage flexibility and innovation in the sector to achieve sustainable success. Unfortunately, this is not possible without providers having clearer delineation between supporting participants to achieve outcomes and overseeing participant compliance; this function should ultimately be overseen by Services Australia or another third party.

1.3. How can a future disability employment program better align with other programs such as the New Employment Services Model and the Community Development Program?

A future disability employment program should aim to better align with the NDIS rather than the New Employment Services Model (NESM) and the Community Development Program (CDP), which aims to reduce the cycle of welfare dependency. A future disability employment program should be centred on a strengths-based model with increased emphasis on supporting individuals to reach their full capabilities rather than focusing on monitoring adherence to compliance and reducing reliance on welfare.

1.4. 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 NDIS is positioning itself to provide capacity building supports prior to engaging with disability employment services. The NDIS and Partners in the Community are responsible for engaging participants, families, and carers from early childhood to promote and encourage progress towards employment. As per the NDIA's Participant Employment Strategy ⁴, a continued and increased focus

⁴ <https://www.ndis.gov.au/about-us/strategies/participant-employment-strategy#strategy>

on supporting employment goals and work aspirations in plans, and challenging societal attitudes, is crucial to supporting employment pathways. The NDIS can complement a future disability employment support program by improving the overall understanding of the Scheme across the sector and seek to better understand the interface of the future Disability Employment Services program with the NDIS. This can be achieved through communities of practice and facilitating knowledge sharing opportunities between programs.

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

2.1. How can the assessment process be improved to connect people with disability to the right employment services?

The current assessment process is based on a medical/deficit model of disability rather than a strengths-based, human rights model which would invariably increase and improve participant's self-esteem and self-determination. Assessments are conducted by health and allied health professionals with varying levels of disability specific knowledge, if any at all. This is particularly detrimental for Deaf, Deafblind, and hard of hearing people who have specific cultural and linguistic needs that are not consistently understood by assessors, and even more so for Deaf, Deafblind, and hard of hearing people with additional disabilities and intersecting identities. This has an overall impact on recommended interventions, allocated benchmark hours, and funding levels, as well as provider referrals. This is compounded further by attitudinal barriers of assessors, DES providers, and employers with a limited understanding of deafness. Accessibility during meetings is also a recurring issue, particularly if interpreters have not been scheduled by Services Australia; there have been reports of assessors attempting to continue meetings without the presence of an interpreter, or simply conducting a file assessment without considering any new or updated information regarding participant's circumstances. During nationwide lockdowns, assessments were conducted primarily by phone or file assessment meaning Deaf, Deafblind, and hard of hearing participants were excluded from receiving appropriate assessments and referrals; video conferencing facilities were not made available until November 2020 and were only offered in very limited circumstances. Assessments can be improved for Deaf, Deafblind, and hard of hearing participants by ensuring health and allied health professionals, as well as Services Australia staff, are appropriately trained and receive regular Deaf Awareness Training, as well as offering video conferencing facilities with full access to preferred interpreters. As there are currently limited services across Australia who specialise in supporting Deaf, Deafblind, and hard of hearing participants, initial meeting rules must also be relaxed to allow participants to gain access to services in other areas who are appropriately skilled to support their needs.

2.2. What should be considered during the assessment process when determining support required to help a person reach their work potential?

Assessors must have demonstrated, working knowledge of specific disability types. Deafness particularly requires specialist knowledge as this cohort have unique and varying cultural and linguistic needs which can occur through language deprivation, attitudinal barriers, and lack of access. Assessors must undertake regular and ongoing Deaf Awareness Training to ensure they understand appropriate interventions and recommendations suitable to build capacity of Deaf, Deafblind, and hard of hearing participants.

2.3. How can the assessment process stream an individual with disability toward the right type of employment support, depending on need and goal?

Assessors must have a solid understanding of the barriers experienced by Deaf, Deafblind, and hard of hearing people, and have a strong network of locally available services to ensure recommended referrals are suitable based on individual needs. Simply providing a list of services based on location after a Job Capacity Assessment has been completed is not enough, particularly for Deaf, Deafblind, and hard of hearing people. Unfortunately, the supply of Deaf specialist employment services is limited so there is no assurance that the recommended provider has any understanding of deafness.

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

3.2. 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?

Deaf community organisations with skilled employment consultants who have an understanding, or better yet, a lived experience of deafness, should provide employment services to Deaf, Deafblind, and hard of hearing people. This ensures culturally appropriate supports are delivered to the community in their language of choice by a service who understands their needs. Deaf community organisations also need funding to deliver employer engagement and awareness campaigns as discrimination is a pervasive and ongoing issue in mainstream society. Mutual obligations should be monitored by Services Australia rather than outsourced to providers, who can then spend more time on building capacity, increasing employment outcomes, and creating meaningful change.

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

Over 90% of deaf children are born to hearing parents⁵, and as such, most deaf children are not exposed to Auslan early enough in their lives; consequently, they often do not acquire a language to native fluency. Throughout early intervention, families of deaf children are provided with options for their deaf child, but these options generally do not include Auslan. More than 85% of Australian deaf children are educated in mainstream, inclusive educational programs⁶ however education providers employ “educational interpreters” who are not credentialled interpreters with no requirement for them to have a formal qualification; schools responsible for hiring them often do not have the necessary skills to assess their ability to perform the role. As a result, deaf students exit the education system often with poor education and language skills compared to their hearing peers. This then impacts on prospective employment opportunities, as well as potential transition to tertiary education. The education and early intervention systems require major reform to ensure language acquisition and education outcomes are improved for deaf people, which in turn will improve employment outcomes.

⁵ <https://www.aussiedeafkids.org.au/perspectives-of-deafness.html>

⁶ <https://www.aph.gov.au/DocumentStore.ashx?id=20035d69-0367-4e09-8d31-8f14d1be41ed&subId=401002>

3.4. How can people receiving disability employment services also be supported to address other barriers to employment (e.g. health service or housing assistance)?

A new disability employment support program should adopt an IPS (Individual Placement and Support) model to provide access to non-vocational services including mental health, housing, education, and financial counselling services, as well as support to obtain additional support for underlying health and mental health issues. This multidisciplinary approach ensures employment service providers work holistically with other professionals to provide Deaf, Deafblind, and hard of hearing people with the appropriate support they need to address their barriers. More emphasis is needed on truly addressing individual and systemic barriers rather than increased focus on meeting mutual obligation requirements.

3.5. 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?

Due to low qualifications and early school leaving, mature aged Deaf, Deafblind, and hard of hearing people are often relegated to menial work or overlooked for employment opportunities and career progression. Mature aged Deaf, Deafblind, and hard of hearing people would benefit greatly from an IPS model, as many members of the community find themselves unemployed or underemployed and on low incomes due to a lack of access to education and training, as well as ongoing discrimination. Additional funding to support mature aged people to break the cycle of inequity is required.

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

4.1. What support do young people with disability need to successfully move out of education into suitable work?

Deaf, Deafblind, and hard of hearing young people must be encouraged to develop vocational and employment goals during the development of their NDIS plans. SLES (School Leaver Employment Supports) has the potential to be an excellent, individually tailored program, however, is underutilised and not extensively promoted by planners and partners.

4.2. What best practices from existing DES or other employment programs help young people with disability find and maintain a job?

A similar model to the Transition to Work program for young people with disabilities would be beneficial under the DES remit, including the accompanying \$10,000 Youth Bonus wage subsidy for employers; there are no wage subsidies for youth of a similar scale in the current DES program. As mentioned previously, SLES is an underutilised model of support that could prove to be greatly beneficial in transitioning young people from education to employment or further education. The Department must also extend eligibility for the JobMaker Hiring Credit to young people in receipt of the Disability Support Pension.

4.3. Should there be assistance to prepare young people to think about work much earlier than after they leave school?

As per the NDIA's Participant Employment Strategy 2019-2022, change and transformation must begin in the early years. This starts from pre-school years so that families can begin their child's education with an expectation of inclusion and progress towards employment.

Research also undertaken by Deaf Connect found that a school transition program would be beneficial for Deaf and hard of hearing students from years 10 to 12. This could include social capacity building and emotional resilience building as well as support with navigating post-school options.

4.4. How can disability employment services work better with the education system to enhance employment prospects for young people?

Due to restricted eligibility criteria, students are generally ineligible to receive support from disability employment services, unless they are early school leavers. The NDIA and Partners in the Community must ensure that employment aspirations and career goals are encouraged, fostered, and reflected in young people's plans to commence support prior to leaving school.

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

5.1. What are the most important things that can be done to build an employer's confidence to employ a person with disability?

Some of the most inhibiting factors impacting Deaf, Deafblind, and hard of hearing people's ability to secure employment are attitudinal barriers and perceived OHS risks. Community education campaigns to dispel employer's misconceptions around deafness is vital to build disability confident employers. Employers would benefit greatly from a WGEA style compliance reporting tool that measures pay gaps, pay inequity, flexible work, disability employment strategies and disability leadership. This compels employers to remain accountable and act on improving employment outcomes for people with disability. It should be noted that Disability Standards for Employment have remained in draft since 1996⁷ by the Australian Human Rights Commission and no such tool currently exists.

5.2. What services and supports does a disability employment support service need to offer employers to enable them to recruit people with disability, maintain their employment and promote career growth?

Specialist deaf providers work well outside of their scope and undertake many unfunded activities to support employers such as communication support, education, interpreting and translation throughout Deaf, Deafblind, and hard of hearing people's employment journey. Government must do more to promote JobAccess, increase EAF Auslan interpreting caps and increase financial incentives including wage subsidies (which have remained stagnant for some time at \$1500 + GST) to

⁷ <https://humanrights.gov.au/our-work/initial-draft-disability-standards-employment>

encourage employers to recruit people with disability. Wage subsidies are an effective tool to secure employment as many subsidised employees are retained by the same employer after the subsidy expires. In those cases, the employer has been given an opportunity to trial an employee they might not have otherwise considered, and find they are suitable for the job. In addition to this, a period of paid employment improves a person's chances of being hired by another employer due to the work experience, skills and confidence obtained.

5.3. What are examples of good practice of employer engagement and employer-led initiatives that have been shown to improve employment outcomes for people with disability? How could these be scaled in the disability employment program?

Whilst some industries offer graduate and internship programs for people with disability, more cultural capacity building is required to ensure workplaces are safe for people with disabilities, particularly Deaf, Deafblind, and hard of hearing people who have unique cultural and linguistic needs. Employers must be motivated to seek out opportunities to become disability confident and increase people with disabilities in their workforce.

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

6.1. What specific assistance or flexibilities would better support people with disability to meet their mutual obligation requirements?

Services Australia must be responsible for monitoring mutual obligation requirements, this will then allow providers to spend more time addressing barriers and building capacity. Participants of disability employment services should not be subjected to the same participation requirements of those in mainstream employment services.

6.2. How should a future program consider other forms of participation and engagement, such as voluntary work or community engagement?

The department should consider adopting a similar approach as the Victorian Skills First Reconnect⁸ program which provides wrap-around supports and interventions that aim to address non-vocational barriers. Providers are funded to offer a range of supports including:

- Counselling and mentoring
- Housing and accommodation services referral
- Mental health support referral
- Foundation skills
- Employability skills
- Careers information, planning and advice.

This approach intends to improve a person's chance of breaking the cycle of disadvantage and address barriers that prevent them from participating in society before entering the workforce.

⁸ <https://www.education.vic.gov.au/about/programs/Pages/reconnect-program.aspx>

7. How can funding arrangements incentivise good work outcomes?

7.1. How could the future funding arrangements ensure services across a continuum of work readiness, placement and retention are tailored to the needs of the participant?

Additional funding is required for incidental supports provided to Deaf, Deafblind, and hard of hearing people as well as addressing non-vocational barriers to employment including mental health, foundational skills and housing and accommodation service referrals. It should not be assumed that people entering disability employment services are work-ready, and funding must be allocated to address non-vocational barriers to achieve sustainable employment outcomes.

7.2. How can service quality and expertise be rewarded and balanced against quantity of outcomes?

The current measure 3.1 Individualised Job Plans should be modified to include random samples of client interviews to measure customer experience and satisfaction, and to contribute towards a provider's Star Rating, should the Star Rating methodology be retained. Failing this, qualitative data should be used to reward and measure the quality of services and expertise of providers, as traditionally this has never been used to formally rate a provider's performance. Sheer quantities of outcomes cannot be the only measure of success, particularly for specialist providers working with Deaf, Deafblind, and hard of hearing people whose funding levels and benchmark hours are not weighted fairly, or indicative of the true supports required.

7.3. What do good providers currently do to support people with disability into work?

Good, specialist providers working with Deaf, Deafblind, and hard of hearing people undertake many additional responsibilities outside of their scope as employment service providers to improve employment opportunities and build awareness in the community. Specialist providers employ bi-lingual/bi-cultural staff who provide communication support and interpreting, and education, and training support at various stages of the employment lifecycle from pre-employment, post-placement support and ongoing support; this work is often unfunded. Employment consultants working with Deaf, Deafblind, and hard of hearing people also undertake individual advocacy to address discrimination which often occurs when accessing education and training, and challenging attitudes of employers which continues to be an ongoing issue in open employment.

8. How do we drive high quality services and supports?

8.1. How can the future program settings encourage and reward innovation and continuous improvement? What works well in the current program?

The Department should consider creating communities of practice to encourage collaboration and innovation in the sector, rather than siloing and isolating service providers. This will enable knowledge and information sharing and foster innovation, particularly for providers who lack awareness or understanding of deafness.

8.3. What arrangements should be in place for market regulation and quality assurance of services?

Provider market share was removed in the 2018-2023 DES Grant Agreement which resulted in an oversupply of generalist providers. It is recommended that market share caps be reintroduced, as well as regular performance evaluations of generalist providers. The Department should also implement regular site audits and undertake participant interviews to monitor quality of services.

8.4. What legal model would be most appropriate to manage the terms and conditions of the agreement between Government and disability employment services providers?

The current contract management arrangement between the Department and service providers is fit for purpose, though does require additional streamlining. Contract management should be overseen by DESE in collaboration with Services Australia.

8.5. What is needed to lift workforce capability and the quality of the workforce delivering disability employment services and supports for both participants and employers?

Turnover in disability employment services is high due to unmanageable workloads, increasing administrative burdens, unachievable KPIs and unattractive salaries. This issue is compounded further for specialist service providers who require a very niche workforce requiring Auslan skills and an understanding, or lived experience, of deafness. The Labour Market Assistance Industry Award 2020 requires alignment with the Social, Community, Home Care and Disability Services Industry Award 2010 to attract, compensate and retain appropriately skilled staff. The Department should also deliver regular professional development opportunities including career development, stakeholder engagement skills, trauma informed care principles and strengths-based practice for staff and offer regular roundtables, communities of practice and disability specific training for employers.

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

There are currently four deaf specialist providers nationwide based in SA, NSW, QLD, and VIC. Demand far outweighs current supply and initial meeting rules further restrict access to services. With 1 in 6 Australians affected by hearing loss and approximately 30,000 Deaf Auslan users with total hearing loss in Australia, there is high demand for deaf specialist providers to enter the market. According to Deloitte, the financial costs of hearing loss was estimated as \$12.8 billion, or \$3,566 per person with hearing loss, most of which was due to reduced employment of people with hearing loss (\$9.3 billion)⁹. However, this could be improved with expert support and commitment from industry to increase employment opportunities for Deaf, Deafblind, and hard of hearing people.

⁹ http://www.hcia.com.au/hcia-wp/wp-content/uploads/2015/05/Social-and-Economic-Cost-of-Hearing-Health-in-Australia_June-2017.pdf

9. How do we measure success?

9.1. What will success look like for:

a) people with disability

- Deaf, Deafblind, and hard of hearing people should expect to see increased rates of employment
- Full access to a range of aspirational employment and education opportunities
- Increased representation and role modelling in the workforce for Deaf, Deafblind, and hard of hearing youth
- Access to increased professional development opportunities and career progression
- Full inclusion in workplace activities including meetings and social events.

b) the community

- Changed perceptions of disability and deafness
- Increased awareness of inaccessible built environments
- Increased awareness of Auslan.

c) employers

- Increased representation of people with disability in the workforce
- Improved retention rates
- High engagement and staff satisfaction
- Improved accessibility for staff and customers

d) service providers

- High customer satisfaction
- Decreased staff turnover and high staff engagement and satisfaction
- Increased network of disability confident employers
- Increased employment and education outcomes

e) Government

- People with disability are represented in all levels of the APS
- Disability employment quotas are achieved and exceeded
- Australia's OECD ranking of disability employment is increased

9.2. What data do we need to know if the program has been effective?

Qualitative and quantitative data is required to measure the program's effectiveness. The Star Rating methodology is not a true measure of success, and more qualitative data is required to measure program effectiveness. The Department should consider implementing a social impact measurement tool which will provide insight into non-vocational impact and change, rather than controlled employment data.

9.3. 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?

Unfortunately, the supply of Deaf specialist providers is limited, with only four service providers nationwide. Deaf, Deafblind, and hard of hearing people do not have any assurances that the generalist service provider they choose or are referred to has any understanding of deafness, let alone staff with Auslan proficiency. There have been reports of generalist services refusing to provide consistent access to Auslan interpreters for meetings due to cost, further hindering access to employment opportunities and career progression for Deaf, Deafblind, and hard of hearing people. As generalist providers work across a spectrum of disability, Deaf Awareness Training should be mandatory to ensure there is a baseline level of understanding of deafness and preferred interpreters should be booked and funded by the provider. These accountability measures must be embedded into grant agreements and funding arrangements.