

4 January 2022

Department of Social Services

Submitted online: <https://engage.dss.gov.au/>

To whom it may concern,

Re: The New Disability Employment Support Model

Speech Pathology Australia (the Association) is the national peak body for speech pathologists in Australia, representing more than 12,000 members. Speech pathologists are university-trained allied health professionals with expertise in the assessment, diagnosis and treatment of communication and swallowing disabilities.

Speech pathologists address the core speech, language, and social skills needed in daily life, which includes social relationships and the workplace. Speech pathologists are trained in working with people with different cultural, educational and learning backgrounds, and can help people access information in different formats that are easy to understand.

In addition to assessment and intervention, speech pathologists can also provide counselling/support to families and caregivers, education of other professionals, case management, consultation, and advocacy. Communication partner training, including staff training, is considered an essential part of a speech pathologist's work.

In addition, speech pathologists have expertise in educating people with disability and the wider community relating to the development of literacy difficulties, and educational and vocational under achievement.

The Association welcomes the opportunity to provide feedback to the Department regarding the proposed Disability Employment Support Model. This feedback is grouped under general themes that apply to multiple consultation questions.

Communication disability

The Australian Bureau of Statistics' 2015 Survey of Disability, Ageing and Carers (SDAC), estimated that 1.2 million Australians had some level of communication disability, ranging from those who function without difficulty in communicating every day but who use a communication aid, to those who cannot understand or be understood at all.¹

Difficulties in speech, language, fluency, voice, and social communication can occur in isolation or the person may have difficulties in more than one area and these can negatively affect an individual's employment opportunities and overall quality of life.

¹ Australian Bureau of Statistics- Australians living with communication disability, 2017.

<http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/4430.0Main%20Features872015?opendocument&tabname=Summary&prodno=4430.0&issue=2015&num=&view>



These difficulties may present differently or subtly in the workplace, such as reading comprehension difficulties, taking situations literally or out of context, or being very withdrawn. A person may use a communication device to communicate, or be communicating with sign or speech that is difficult to understand at times.

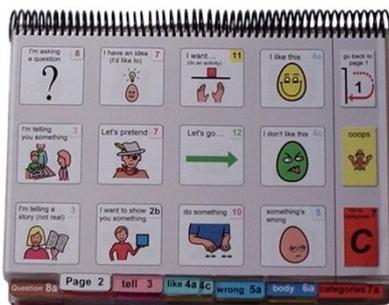
Communication disabilities can arise from a range of conditions that may be present from birth (e.g., Down Syndrome or Autism), emerge during early childhood (e.g., Developmental Language Disorder, stuttering, severe speech sound disorder), or during adult years (e.g., traumatic brain injury, stroke and head/neck cancers, neurodegenerative disorders such as Motor Neurone Disease) or be present in the elderly (e.g., dementia, Alzheimer's disease, Parkinson's disease).

Some people with disability have complex communication needs (CCN), which are difficulties with understanding and/or the expression of communication, associated with additional physical, cognitive or sensory impairments. Many people with CCN benefit from the provision of alternative or additional methods of communication, including aided Augmentative and Alternative Communication (AAC) such as communication books, boards, speech generating devices and accessible technology for phone and internet-based communication.



Augmentative and alternative communication refers to methods of communication that either support speech, where speech is difficult to understand (unintelligible) or as an alternative to speech, when speech is very limited, or the person has no speech.

AAC can include 'unaided' methods of communication such as signing and gestures, body language and facial expressions; it can also include 'aided' communication, using pictures, symbols, text and spelling with paper-based or electronic resources. AAC needs to be sufficient to enable a person to use language – however, it is in a different form to what most people use day to day.



People with severe communication impairments include those with acquired brain injury (e.g., stroke, traumatic brain injury), neurodegenerative disorders (e.g., Parkinson's disease) and developmental disabilities (e.g., cerebral palsy, intellectual disability, autism). In Australia there are thousands of individuals with CCN who have a severe/profound core activity limitation affecting their communication.

In 2018, of the 4.4 million Australians who had disability, almost 3.9 million people had a limitation with the core activities of communication, mobility or self-care and/or a schooling or employment restriction. As a proportion of the Australian population: 3.2 per cent had a profound limitation and 2.6 per cent had a severe limitation.² Only 27.2% of people aged 15-64 with a profound or severe disability were participating in the labour force in 2018³.

² Australian Bureau of Statistics - Disability, Ageing and Carers, Australia: Summary of Findings, 2018. <https://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/4430.0Main%20Features52018?opendocument&tabname=Summary&prodno=4430.0&issue=2018&num=&view=>

³ Australian Bureau of Statistics - Disability and the labour force, 2020. <https://www.abs.gov.au/articles/disability-and-labour-force>

Communication access

Communication access can be simply defined as being ‘when everyone can get their message across’. It is similar to the concept of providing ‘kerb cuts’ for communication. Kerb cuts make it possible for people who are in wheelchairs to access their physical environment. Similar to mobility access, communication access involves the provision of the necessary environmental supports for people with communication disability to access the environment by being able to communicate effectively.

Communication access is as important as physical access to people with disability if they are to participate fully in economic life and is in line with the UN Convention on the Rights of Persons with Disabilities: Article 9 - Accessibility, which, in addition to stating the need to address barriers in the built environment also highlights the need to take into account **all** aspects of accessibility. Unfortunately, communication access is rarely thought about in relation to the employment sector.

Employment strategies

Throughout Australian culture, ableism is a significant issue. Ableism can be defined as the discrimination or prejudice against people who have disabilities. It can take the form of ideas and assumptions, stereotypes, attitudes and practices, physical barriers in the environment, or oppression on a more systemic level. Therefore, the attitudes and biases that able-bodied people have towards people with disability can have dramatic impacts, even if these are unconscious or unintentional.

Within society, ableist negative stereotypes and misconceptions frequently prevail that a communication difficulty is synonymous with a loss of capacity and competence.

For example, people with complex communication needs routinely report that communication partners:

- Direct their questions and information to support workers or family who do not have CCN, by default.
- Assume that they have severe cognitive impairment and are unable to participate in any way in communication interactions.
- Fail to seek, provide, or use their AAC, or any of the many evidence-based aided AAC supports which could support their communication.

Correspondingly, it may be assumed that someone who does not use expressive speech cannot communicate, has a cognitive disability and/or does not have capacity to work. Assessments of the person’s cognitive and communication abilities may be provided, but rarely modified to assess people of diverse abilities, and with no adjustments to account for, or reflect the barriers to communication faced by the individual. Any assessments within an employment context will therefore need to take into account the complex communication needs of the individual.

People with complex communication needs may need additional supports and adaptations to current employment systems to encourage their involvement. This may involve assuming competence on behalf of the person with disability by asking for their input, and creating environments that take communication needs into consideration to assist the person with disability to participate fully. It may also involve reasonable adjustments to allow for them to communicate using a form of AAC.

There must also be acknowledgement that there are several other aspects that affect access to employment outside of the tasks within the role. The Australian Human Rights Commission identified that one of the potential barriers to people with disability within Australia entering and staying within the workforce is the “lack of availability of accessible transport, technology in the workplace and workplace design”⁴. People with complex communication needs may be unable to use some modes of transport because they are unable to verbally convey their destination, and public transport may not be accessible. In relation to technology, of the portion of people with disability who identified they did need

⁴ Australian Human Rights Commission- Barriers to employment. <https://humanrights.gov.au/our-work/9-barriers-employment>

workplace adjustments, 44% indicated they needed special equipment⁵. This could involve technology to improve access, including AAC, or software that might allow the integration of the person's existing communication technology.

Communication, by definition, involves at least two people. This means that people who are in the community and potential employers could, or will, be interacting with a person with communication disability and are therefore a significant part of the 'environment' which may require 'modification' to enable access to employment. It is the position of Speech Pathology Australia that communication accessibility should be introduced as part of universal design, and be investigated as a barrier to people with disability entering the workforce.

Workplaces need to be fully accessible, including communication access. Communication access does not require a lot of money to achieve as it relies on the awareness and understanding of non disabled people, and a willingness to adjust their interactions in line with the communication needs of the person. For example, in addition to using AAC, this may be speaking directly to the person with disability, indicating to the person when they have not understood what they have said, providing information in multiple formats if necessary, giving people time to respond and repeating information if needed.

Employers and workplaces should provide and be provided with training regarding communication access. Whilst this may potentially be funded by an individual's NDIS plan, there should not be a reliance upon this funding, or an onus placed upon the person with the disability to train other individuals regarding their communication needs. This training should be the responsibility of the workplace, perhaps through consultation with a speech pathologist, or using existing training models, such as Scope's Communication Access training, or the new 'Supporting Effective Communication' module that the NDIS Commission has developed for NDIS providers and workers. In addition, general workplace training about the spectrum of communication disability, and how to provide information in accessible formats for all learners would be a highly regarded improvement.

We hope you find our feedback useful, if Speech Pathology Australia can assist in any other way or provide additional information please contact Ms Amy Fitzpatrick, Senior Advisor Disability, on 03 9642 4899 or by emailing afitzpatrick@speechpathologyaustralia.org.au. Thank you for the opportunity to provide feedback.

Yours faithfully



Tim Kittel
National President

⁵ Australian Institute of Health and Welfare - People with disability in Australia, 2020.
<https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/summary>