

Submission to the Australian Government's Department of Social Services New Disability Employment Support Model Consultation

The Australian Government's Department of Social Services is interested in ensuring that people with disability, their families and carers are involved in the disability employment services reform and hearing what the new disability employment support model should look like.

About Life Without Barriers

Life Without Barriers is a charitable organisation supporting approximately 22,000 people in over 500 communities across Australia. We provide people with the services and assistance they need so they can achieve their goals and maximise their opportunities to participate in the community. Life Without Barriers partners with communities, elders, governments and other stakeholders to support people so they can achieve positive long- term change. We offer services to people with disability; children, young people and families; people with mental health needs; refugees and people seeking asylum; and people who are homeless.

Life Without Barriers was established almost three decades ago by a determined group of community members with a clear vision – to partner with people with disability to improve their lives. Our purpose carries us forward today as a national provider of social services. Life Without Barriers directly supports around 4,000 people with disability through the National Disability Insurance Scheme (NDIS). The majority of our disability clients have intellectual disability, and many have high and complex needs.

Life Without Barriers employs over 8,000 staff and is responsible for annual funding of approximately \$700 million. As an organisation whose legacy began on forging services for people where they simply did not exist previously, we are deeply committed to assisting people with a disability to have equal access to all the same life choices as people without a disability, including employment.

We respond to the Department of Social Services' New Disability Employment Support Model consultation as follows. Life Without Barriers' submission pays particular attention to questions that relate directly to service providers that deliver Disability Employment Services and organisations that focus on supporting employment opportunities for people with disability.

Life Without Barriers notes the Department of Social Services' Mid-term review of the Disability Employment Services (DES) Program undertaken by Boston Consultancy Group and released in August 2020. In particular, Life Without Barriers supports the short-to-medium term and longer-term reform options outlined under Theme 7: Unlock employer demand.

Theme 7: Unlock employer demand

Short-to-medium term: Seek to address common employer concerns around employing someone with a disability (e.g. risk, liability), accompanied by a communications and outreach effort.

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In the spirit of Reconciliation, Life Without Barriers acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Owners and Custodians of this country, and their connection to land, water and community. We pay our respect to them, their cultures and customs, and to Elders both past and present.

Longer-term: Consider placing greater emphasis in policy mix on wage subsidies and other employment support and Work with NDIS to improve deployment of NDIS funding to enhance employment and education outcomes through on-the-job and classroom support.

Life Without Barriers welcomes the release of Australia's Disability Strategy 2021-2031, the associated Employment Targeted Action Plan, and the Employ My Ability Strategy. Life Without Barriers also thanks the people with disability who provided their feedback to previous consultations and members of the Disability Employment Advisory Committee for their valued input into the plan.

NEW DISABILITY EMPLOYMENT SUPPORT MODEL CONSULTATION QUESTIONS:

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?

It is acknowledged by the Department of Social Services that around 4.4 million people in Australia live with disability and Life Without Barriers believes that every person with disability, older than 15 years of age, should be able to access a disability employment support program if they choose. We believe that there should be a broad definition of disability for these programs and there should be little required by way of 'evidence' for eligibility. Access should be simple and streamlined. Accessing these supports should not promote feelings of stigma for clients.

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?

Yes. All options should be available under the program. The above pathways mirror those of the general community and they provide significant ways for people with disability to gain skills and experience.

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?

We believe that there are areas of overlap and confusion between DES, ELS, NDIS, Jobactive and Transition to Work concerning provisions for eligibility, best meeting individual needs and funding. Clarity is needed and programs need to be complimentary. We believe that information about the different programs in simple formats for people with disability, service providers, professionals and the community generally would be beneficial.

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?

Generally, the NDIS provides support for people who have higher needs. Additionally, the NDIS can assist people with a wide range of needs that may facilitate pathways to employment. As such, clear pathways and information on interfaces between the NDIS and DES (and other programs) is important. Gaining employment skills within the NDIS can be an important precursor to successfully accessing DES.

An example of this is the School Leavers Employment Supports (SLES) program funded through individual NDIS support plans which provides crucial supports for young people with disability to access appropriate employment and education supports. Similar supports are also available for other people through the NDIS. We believe there should be clear and simple pathways between the programs which will require information to be available through both NDIS and DES systems. Accessing both programs

simultaneously, while not causing inefficiencies and duplication should be possible.

Life Without Barriers has been actively working towards strengthening pathways between DES and the NDIS, as many DES clients may be approved for access to the NDIS however are not aware that they are able to obtain employment support through their NDIS plan. In contrast, many NDIS participants may not be aware that they are able to seek support for employment related activities through DES providers.

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

2.4. Are there different assessments needed at different stages of an individual's work journey, as they prepare for work, find and maintain employment, and progress their career?

Whilst assessments and associated processes are important for a number of reasons, a key issue to address is the impact of assessment processes for people with disability. Many people have undergone a large number of assessments over time. Therefore, particular attention needs to be given to this issue. Furthermore, while assessments may provide significantly utility in respect of identifying capabilities and capacities, they need to be considered in conjunction with client wishes and aspirations.

Therefore, the assessment process should be established on a number of principles, including:

- Considering previous assessments and available information
- Sharing (with permission) information already available from agencies
- The need to not impose cost or detriment to the person
- Being strengths-based and not focusing on deficits
- Only addressing matters that are relevant to employment
- Not promote labelling/stigma

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

A combination of vocational and non-vocational supports are key to successfully placing and retaining people in employment. These may include support to undertake further education, manage mental health, managing finances, housing, transport, practical skills development, workplace training and other life skills and social supports.

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?

Young People's Employment Pathways (YPEP) launched in two sites in April 2021, Hunter Central Coast and Perth Metro. Focusing on leveraging the combined strengths of Joblife and Life Without Barriers the model supports young people with disability transition from school to employment, based on their individual needs and goals. YPEP includes both the School Leavers Employment Supports provided by Life Without Barriers and funded under the NDIS and Eligible School Leavers and DES provided by Joblife Employment that aims for school leavers to enter straight into open employment.

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

There are and have been some good examples in the specialist disability system now and these focus on early engagement through schools to explore employment opportunities including work experience, apprenticeships pathways etc. Strengthening the transition from school to employment is essential. From our experience and involvement with the School Leaver Employment Supports (SLES) program, working with young people to build a trusted relationship and genuinely co-design their individual pathway to employment and goal setting is seeing improvements in engagement and outcomes

particularly in terms of motivation and confidence. Also, there are a number of good examples of early engagement through TAFE/Apprenticeship pathways worth examining.

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?

Life Without Barriers has a long-standing commitment to providing and promoting jobs and careers for people with disability. The right to work, free from discrimination, is a fundamental human right and is protected under the International Convention on the Rights of Persons with a Disability. Life Without Barriers is addressing this issue in our own business operations, primarily through the development and implementation of our Accessibility, Inclusion and Employment Plans (AIEP's).

As a leading community sector agency, with over 8000 staff, we believe we have a responsibility to implement and practice inclusion. Creating a culture that is welcoming and supportive of employees of all abilities not only harnesses diversity of experience and perspective, but also provides greater insight into the needs of the people trusting us to provide their disability services. This in turn helps us offer relevant services informed by the people we support.

With this objective Life Without Barriers developed our first Accessibility, Inclusion and Employment Plan (AIEP) in 2016 with the challenge of making our organisation truly inclusive. The underlying principle is that we respect and appreciate the differences of our employees and the people we support, and are enriched by the diversity of their gender, sexual orientation/identity, age, ability, cultural and religious beliefs, perspectives, life experiences and ideologies.

A key component of our first AIEP was to employ people with disability into meaningful roles within Life Without Barriers' business operations.

Three key areas of focus were:

- I. Ensure employees and managers are 'disability aware' so that recruitment and workplace practices encourage the employment of people with disability.
- II. Ensure our premises, digital and communication platforms and vehicles are accessible to people with disability.
- III. Provide leadership in the community to encourage accessibility and inclusion for all.

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?

Disability Employment Support Services may consider taking a lead role in creating open and positive conversations with employers in Australia to challenge what they know about their own workforce including; how inclusive their recruitment practices are; how many people in their workforce have disability; and what practices they need to embed to be more inclusive.

Life Without Barriers Strategy 2025 recognises our role in influencing systemic barriers faced by people with disability. Through this strategy we have mapped our appreciation that complex, long-standing challenges can rarely be solved by one individual, organisation or group alone. Real and lasting change requires trusted partnerships, collaboration and a purpose that unifies people to a collective ambition.

Life Without Barriers is making an additional commitment in our Strategy to improve employment opportunities for people with disability beyond the doors of our own organisation through positive and inclusive advocacy.

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?

Life Without Barriers has made progress in tailoring our culture to optimise accessibility to employment for people with disability. However, sustained vigilance is required. Our Board, Chief Executive and senior executive team have provided strong leadership on this issue through the entire organisation.

Our partnership with the Australian Network on Disability (AND) has greatly assisted us to better understand and address inherent barriers to employment. AND is an organisation that assists other organisations with attitude, cultural and practical resources and strategies to provide employment opportunities for people with disability. Disability Confident Recruiter status is conferred by AND to organisations that demonstrate they have systems in place to appropriately employ people with disability. Life Without Barriers recommends that all Disability Employment Support services and other interested organisations consider engaging with AND.

As a result of our engagement with AND we have undertaken detailed reviews of 26 of our recruitment practices. Key activities included:

- Redesigning our careers webpages to meet the Web Content Accessibility Guidelines 2.0 Standard
- Having clear information and messages in our recruitment information and website welcoming candidates with disability and advising that they can request adjustments, including for the recruitment process
- Seeking feedback from employees with disability about their adjustment process once they were employed with the organisation
- Having an experienced 'go-to' person for all workplace adjustments in the organisation
- Ensuring that pre-screening questions relate only to the essential requirements of the role
- Developing training and guidelines for staff involved in recruitment
- Ensuring that any assessments relate only to the essential requirements of the role and take into consideration how roles can be undertaken after adjustments are made.

We have established our Disability Ability Wellness Network (DAWN). DAWN is a Life Without Barriers employee network which supports staff with disability to come together and share ideas about how we can support people with disability, chronic health conditions and mental health conditions. This group is able to speak directly to our executive team and the whole organisation and is supporting our growing positive culture in this area.

5.4. What other information, services and supports do employers need to support employees with disability?

The barriers to employment faced by people with disability are often complex. The question of whether a person should disclose their disability is a difficult and very personal issue for an employee or potential employee. A disability may be obvious, but it is more complex when a disability is not obvious to others, sometimes referred to as an 'invisible disability'.

As employers we want to ensure that everyone is safe in the workplace and any necessary adjustments are made to allow a person with a disability to do their job effectively. To do this, we need to know about a disability. However, we recognise that some potential employees may be reluctant to disclose their disability in light of the discrimination many people with disability face. It may also be that people do not want their disability to be considered in their employment or allocation of work and respect and consideration needs to be given to this.

Life Without Barriers believes that an enquiry from an employer about a person's disability should be limited to anything that impacts only on the requirements to do the job and not of a more personal

nature. Therefore, information obtained should be limited to that which is needed to ensure any necessary adjustments are made in providing a safe workplace.

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?

For people with disability experiencing complex barriers, greater flexibility in how they are engaged would be useful. This could include flexibility in the venue and frequency of face-to-face meetings, use of video chat, phone etc.

In some cases, these participants may benefit from provider discretion with regard to the enforcement of compliance rules, acknowledging that those with highly complex barriers are often unable to meet all compliance requirements.

9. How do we measure success?

9.3. How can people with disability, employers and providers help to measure and report on the performance of the new program?

People with disability, employers and providers would be expected to complete a variety of targeted surveys and an exit interview/survey. Qualitative measures such as self-reported outcomes and satisfaction of participants should also be considered. Regular independent reviews conducted with both people with disability and employers would also be prove helpful in determining the outcomes achieved by the DES program.

The progression of participants through stages of the program and their improvement in work readiness should be measured using surveys and interviews and measurement should consider transformative change, not short-term indicators. This means that the strategy must look at long term changes and consider employment retention, career opportunities and not only job placement numbers. These issues are acknowledged as current matters for improvement in existing DES and other systems.

Key measures should also include ABS type statistics concerning employment and labour force participation rates. However, the No 1 key measure should be comparisons against the opportunities and outcomes that are available to the general community.