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Disability Employment Reforms Branch
GPO Box 9820
Department of Social Services
Canberra ACT 2601

Submission on the New Disability Employment Support Model

Thank you for the opportunity to provide a submission on the New Disability Employment Support Model. We welcome the spirit of collaboration and are acutely aware of how important the voice of employers is to the reform of how disability employment services meet our shared vision for Australia and increasing employment of people with disability. Our submission is based on our 21 years experience working with employers and consultation workshops held with employers in November and December 2021.

We have crafted our responses based on the questions within the consultation paper. For the purpose of this report, we have referred to the current and proposed future disability employment support model as 'DES'.

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

The Australian Network on Disability considers that disability advocacy organisations are well placed to respond to the question of who should be able to access to the program. However, we make the following two comments based on feedback from employers and university students and graduates with disability.

1.1a People who, because of disability, require significant support with:

- job matching
- negotiating and implementing adjustments that the workplace may be required to implement
- workplace support for the short or long term.

1.1b The DES program should be suitable for people with disability who have higher education qualifications. Anecdotally, many degree qualified and post graduate qualified people with disability have told Australian Network on Disability that the current DES program is geared towards unskilled jobs and does not meet their needs.

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

The Australian Network on Disability considers that other organisations have deeper knowledge and expertise on the topic of entry to DES support. Access to employment support for people with disability should be person-centric and provide an encouraging and welcoming experience.





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

The Australian Network on Disability acknowledges the extensive knowledge and expertise of others who are better placed to respond to the types of employment services and supports required. No specific recommendations.

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

Advocacy organisations have deep knowledge and expertise, and we defer to their knowledge. From an employer perspective, employers are more likely to engage when they perceive there is minimal risk of a workplace accident and minimal risk of poor performance. Therefore, developing work history as early as possible mitigates against these perceived risks. Australian Network on Disability make the following points:

4.1a Exposure to the world of work through work experience during school education, support to undertake casual work whilst at school and support to undertake casual and/or temporary work throughout secondary and tertiary education are the strongest predictors of sustained post-school employment.

4.1b Earn and learn programs such as Ticket to Work, apprenticeships, traineeships, and cadetships are also strong predictors of sustained employment, and the new DES model should strongly reward providers who facilitate earn and learn programs.

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

The Australian Network on Disability has structured recommendations into a framework which includes Attitudes, Policy Settings, System Design, Program Design and Practice.

5.1 Attitudes

Much has been written about employer attitudes and community attitudes towards people with disability and it's not our purpose to regurgitate the well-known findings.

The Federal Government's attitude toward people with disability is reflected in how politicians and officials 'talk the talk' and 'walk the walk' in the abovementioned roles. Our recommendations:

5.1a An uplift in community attitudes can be achieved by ensuring the reforms to the DES program optimise policy settings, system design, program design and practices. The scale of the DES program has enormous potential to lead to increased positive attitudes, and providers, employment consultants, participants and employers all have the potential to be advocates.

5.1b Maximise the potential to influence positive attitudes toward people with disability by outsourcing the content of the Job Access website. The program is rich with stories, data points and information that could be making a strong contribution to creating change and convincing employers who are undecided to engage with the DES program. Skilled storytellers can 'mine the gold' from DES, Job Access, and the National Disability Recruitment Co-Ordinator programs to create relevant and powerful content to encourage employers and people with disability.

5.2 Policy Settings

The Australian Federal Government has enormous power to influence outcomes for people with disability through its roles as policy maker, regulator, program funder, purchaser, and employer. Within the context of the DES Reform, Australian Network on Disability make the following recommendations:

5.2a The revised DES program should recognise the role of employers in the policy settings, as this is a mechanism to ensure that employers are also considered in system design, program design, practice and in purchasing arrangements.

5.2b The responsiveness and the quality of employer servicing are vital to the success of the DES program and minimum standards should be part of the purchasing arrangements.

5.2c Future DES should include a program equivalent to the Employment Parity Initiative facilitated by the National Indigenous Australians Agency. This enables very large employers to make enterprise level commitments to recruiting an agreed number of jobseekers with disability over a specified time and be paid according to outcomes.

5.2d Eligibility for the Employment Assistance Fund should extend to casual roles because many employers have a 'casual first' entry door into ongoing employment. Especially during a COVID-impacted economy.

5.3 System Design

Employer utilisation and satisfaction are not components of the current DES system design. Employers report inconsistency of quality of DES providers and difficulty in navigating the system. The current 'Star Rating' system and extensive lists of providers is unhelpful to employers who are seeking to select a provider and engage with the DES program.

5.3a Measure and report aggregated data on employer utilisation of the DES program to determine whether the reformed program has improved its appeal to employers across specific segments such as very large, large, medium, and small. Additional data points could include industry, location etc.

5.3b Consider a method for obtaining 'pulse checks' of employer experiences throughout the contract term. Reward providers who score highly on employer satisfaction and repeat business.

5.3c Provide quarterly reports on employer utilisation to the DES Taskforce to identify whether the new system is improving employer utilisation.

5.4 Program Design

To increase employer engagement and utilisation of the reformed DES program should reduce employer uncertainty by providing better information, make the program easier to navigate and enhance the Employment Assistance Fund. The program should also be flexible and responsive to employer innovations and labour market skills shortages. The Australian Network on Disability makes the following recommendations:



Better information

Universal 'blanket' approaches and 'generic' information have limited efficacy in supporting large and medium business to change behaviour. Employers value more **customised and tailored support and advice**, which has specific and direct practical relevance to their situation.

- 5.4a Develop and provide a 'Service Charter' or similar so that employers can clearly understand the services and supports they can expect from DES providers.
- 5.4b Develop an efficient, dependable, and valid method for employers to select a DES provider, or providers.
- 5.4c Develop a 'help-desk' specifically for employers so they can get practical and tailored guidance and assistance with problem solving.
- 5.4d Ensure eligibility and information about Government incentives and wage subsidies is readily available, predictable, and accessible in a timely way.
- 5.4e Provide a template and/or resource to help businesses to formulate their 'business case' for recruiting people with disability.
- 5.4f Promote the Work Assist program including through industry associations to increase employer's understanding of the program and its benefits. Over time, this will make it easier for employers to retain employees who acquire non-compensable disability.
- 5.4g Develop comprehensive on-line training resources to build the disability confidence of employees, managers, and recruiters. Fund Job Access to present regular webinars on inclusive recruitment practices and creating accessible and inclusive workplace environments.
- 5.4h Maximise the utility of the Job Access website by including all federal and state legislation and information regarding traineeships and apprenticeships. Make it a one-stop shop for information relating to employment of people with disability.

Program navigation

- 5.4i Support easier navigation provide a national single point of contact within the DES system.
- 5.4j Provide a 'national solution' to recruitment to support medium and large employers by developing a brokerage service.
- 5.4k Develop a 'joined up' system (supported by humans) that enables employers to access the entire talent pool of jobseekers in the DES program.
- 5.4l Ensure there are no programmatic barriers to meeting the needs of very large, large (multi-site and single site), medium and small employers.

Redesign and promote the Employment Assistance Fund

- 5.4m Reduce employer's administrative burden of accessing the Employer Assistance Fund.



5.4n Expand the eligibility to the Employment Assistance Fund to include adjustments required for equitable recruitment processes for jobseekers with disability.

5.4o Revise the way that information is shared about a candidate or employee and prevent 'diagnosis' information from being provided to employers.

5.4p Promote Job Access widely as a service that provides independent and personalised service and support to employers.

5.4q Promote the Employment Assistance Fund and provide a specific 'employer hotline' that provides practical assistance.

Flexible and responsive to innovation and labour market skills shortages

5.4r The future DES program should be able to be scaled and be flexible for employers to maximise opportunities for success. The program should be flexible and facilitate 'demand led' programs which often have a success rate of 80% or more.

5.4s The future DES program should be able to respond promptly to skills shortages and use scaled solutions to seize opportunistic labour market challenges. This could be an agenda item for the DES Taskforce.

5.5 Practice

The Australian Network on Disability acknowledges that the government funds providers and does not specifically fund provider practices.

Employers want employment service providers to commit to understanding their business and only put forward candidates who are interested and suitably skilled for jobs.

DES providers should:

- Be proficient at work, job, and task analysis with an understanding of inherent requirements of roles.
- Have functional knowledge of Work, Health and Safety and wellness at work.
- Provide practical and pragmatic **information on how to 'operationalise'** the employment of someone with disability within the workplace (i.e., workplace settings, integration, management, and how this might differ depending on the nature of the disability).
- Provide expert matching of interested and suitably skilled candidates to jobs.
- Support the candidate's recruitment and interview process and facilitation of workplace adjustments as required.
- Provide support for the implementation of any practical or behavioural workplace adjustments required to facilitate integration with co-workers.
- Support the employee's induction process.



- Develop a 'Support Plan' in negotiation with the program participant and the manager/supervisor. Where applicable, the Support Plan should continue for the employee's probationary period.

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

The Australian Network on Disability has no recommendations to make.

7. How can funding arrangements incentivise good work outcomes?

The Australian Network on Disability has no recommendations to make.

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

The Australian Network on Disability appreciates that there are other stakeholders who have deep knowledge and expertise on driving high quality services and supports. We offer the following recommendations based on our experience with, and, feedback from employers.

8.1a Develop a set of minimum service standards and service commitments to jobseekers and employers.

8.1b Revise the quality assurance system and ensure that government purchases quality services that are fit for purpose and serve the needs of program participants and employers.

8.1c Develop a system that supports program participants to make informed decisions on selecting a DES provider suitable to their needs.

8.1d Develop, implement, and promote an employment complaints hotline and provide a feedback loop from participants and employers to facilitate program improvement.

8.1e Buy services from providers who train and develop their employees to meet a (yet to be determined) standard that ensures they can provide quality services to jobseekers with disability and employers.

9. How to measure success?

The revised DES program should not rely on market failure of providers as a method of program management. It is unconscionable to use 'market failure of providers' when the service recipients are vulnerable people and risk averse employers.

9.1a Recommended quantitative measures include

- Program operates within budget
- No market failure of providers
- Increased success rate (participants who got and retained a job for 52 weeks vs who did not get a job)
- Increased employment outcomes at 52 weeks



- Increased number of voluntary program participants
- Increased number of employers using the program
- Increased tenure of jobs
- Reduced churn of program participants (voluntary and mutual obligation).

9.1b Qualitative

- Program delivers on Australia's UNCRPD commitments
- 'Pulse check' surveys of program participants to determine whether the program is meeting their individual needs (relating back to the service commitments noted above)
- 'Pulse check' survey of employers to determine whether the program is meeting their needs (relating back to the service commitments noted above)
- Employers recommend the service to other employers
- Sustained use of the program relative to the size of the employer.

In closing and to summarise, employers need the new disability employment support model to:

1. Provide a clearly articulated quality service offering and program navigation.
2. Streamline the linkage between the talent pool and employers.
3. Provide flexibility to respond to innovation and labour market skills shortages.

Yours sincerely,

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