

# Establishing a Disability Employment Centre of Excellence

**APM Submission**

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## Photography

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## About APM

**APM Group is a team of 14,000 people in 11 countries with a global purpose - to enable better lives.**

**We started in 1994 as a small team in Perth, Western Australia, looking to provide better vocational rehabilitation for injured workers so they could recover their health and stay in their jobs.**

**Today we are an international human services provider with more than 1,700 locations across Australia, the United Kingdom, Canada, the United States of America, New Zealand, Germany, Switzerland, Spain, Sweden, Singapore, and South Korea.**

For people with injury, illness, or disability, as well as children and the elderly, the unemployed, and those facing hardship or harm, our teams make a positive and lasting social impact every day.

We take immense pride in empowering people to realise their ambitions and aspirations through sustainable employment, independence, better health, and wellbeing, and increased social participation.

Each year globally, APM now supports more than 2 million people of all ages to live a better quality of life.

In Australia, our more than 5,000 strong team deliver key services across the social care economy – employment services, training, aged and disability care, community and assessment, and health and wellbeing from more than 750 locations nationally.

Simply put, we help people to find employment, recover from injury and illness, improve their health, and enjoy social and economic participation in their community, no matter where they are in life's journey so that they can achieve optimal independence and wellbeing.

We commenced delivering contracted disability employment services in 2007 under the Vocational Rehabilitation Serves (VRS) program and have expanded our services through each contract iteration since and are the largest provider of the current Disability Employment Services (DES) program in Australia. We hold 192 contracts, operating from 446 sites across Australia and in the last financial year we supported 26,057 people with disability secure work.<sup>1</sup>

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<sup>1</sup> Performance data for 1 July 2022 and 30 June 2023

## Introduction

APM welcomes the opportunity to contribute to the discussion on a Disability Employment Centre of Excellence (the Centre).

As the largest provider in the current DES market, we are keen to work with government on the development of a Centre that supports and strengthens the disability employment ecosystem and delivers greater inclusive employment opportunities for all Australians with disability.

Our submission draws on our experience as a provider of employment and related services to people with disability including DES, Workforce Australia, and National Disability Insurance Scheme (NDIS) supports and builds on the contribution made at the Disability Employment Centre of Excellence design session held at the NESAC Conference in October 2023.

It considers the feedback already received on the design of the Centre as outlined in the options paper, and the potential impact of the range of inquiries and reviews that intersect with disability employment including the findings and recommendations of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disabilities (the DRC),<sup>2</sup> the NDIS Review<sup>3</sup> and the Inquiry into Workforce Australia Employment Services.<sup>4</sup>

Additionally, the following key principles guide our response:

1. **All people with disability, regardless of diagnosis, should have access to high quality and high performing supports and services** to fully participate in their chosen communities and in all aspects of social, economic, and political life.
2. **Enabling better lives starts with genuine inclusion.** Everyone needs to step up and play a bigger role in ensuring services, institutions, and communities are truly accessible.
3. **Policies and programs need to be underpinned by good evidence.** Research and a strong evidence base are crucial to good policy design and effecting real change.
4. **The disability employment ecosystem is bigger than just the programs and supports governments fund,** and employers and the broader community are key to unlocking opportunity.
5. **What gets measured, gets done.** Targets are a critical enabler to shifting the dial on employment outcomes.
6. **We do it better together.** True co-design and collaboration between people with disability, families, carers, advocates, employers, service providers and government is crucial to driving more inclusive employment.

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<sup>2</sup> [Final Report | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)

<sup>3</sup> [Working together to deliver the NDIS | NDIS Review](#)

<sup>4</sup> [Inquiry into Workforce Australia Employment Services – Parliament of Australia \(aph.gov.au\)](#)

# Why do we need a Disability Employment Centre of Excellence?

## People with disability continue to face significant barriers to employment.

As the options paper highlights, the Government is committed to increasing employment outcomes for people with disability, yet despite successive governments investing in a range of policies and programs aimed at helping people with disability access the labour market, the overall rate of workforce participation for people with disability has moved little in recent years and people with disability continue to face poorer employment outcomes than those without.<sup>5,6</sup>

We know employment is central to supporting greater economic security, enabling people with disability to exercise more choice and control over their lives, increasing their financial independence and overall standard of living. It also has significant flow on effects beyond the individual, both socially and economically<sup>7,8</sup> which is why sustained and inclusive full employment is the primary objective of Treasury's Employment White Paper – Working Future.<sup>9</sup>

However, as the options paper also notes, despite the significant investment in, and sustained delivery of, employment outcomes through government policy and disability employment programs to date,<sup>10</sup> people with disability continue to face significant barriers to work, particularly those with more significant and/or complex disability. More importantly, these barriers are not new, nor are they are unknown.

Successive inquiries held since 2005, including most recently the Disability Royal Commission, continue to highlight the same perennial barriers to employment – the majority of which are the result of structural, environmental, and attitudinal issues.<sup>11</sup> Yet most of Australia's policy and program interventions continue to focus on the individual with disability themselves,<sup>12</sup> rather than working to address these broader, more embedded, and systemic obstacles.

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<sup>5</sup> [Australia's Disability Strategy 2021-2031 \(disabilitygateway.gov.au\)](https://disabilitygateway.gov.au)

<sup>6</sup> [People with disability in Australia, About - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://aihw.gov.au)

<sup>7</sup> [Inquiry report - Disability Care and Support - Productivity Commission \(pc.gov.au\)](https://pc.gov.au)

<sup>8</sup> [Willing to Work: National Inquiry into Employment Discrimination | Australian Human Rights Commission](https://ahrc.gov.au)

<sup>9</sup> [Working Future: The Australian Government's White Paper on Jobs and Opportunities | Treasury.gov.au](https://treasury.gov.au)

<sup>10</sup> For example, as of 31 October 2023 Disability Employment Services providers have supported people with disability to achieve more than 219,000 26-week employment outcomes since July 2018 based on the [DES Monthly Report](#)

<sup>11</sup> See for example: HREOC (2005) [National Inquiry into Disability and Employment](#), AHRC (2016) [Willing to Work: National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability](#), The Social Deck (2019) [Right to opportunity: Consultation report to shape the next national disability strategy – Full Report](#), National Disability Insurance Agency (2021). [Achieving a 'sense of purpose': pathways to employment for NDIS participants with intellectual disability, on the autism spectrum and with psychosocial disability in Australia.](#)

<sup>12</sup> [Employment Targeted Action Plan \(disabilitygateway.gov.au\)](https://disabilitygateway.gov.au)

## **There is no single solution to increasing disability employment and driving inclusion.**

As outlined in Volume Five of the DRC Final Report, improving outcomes for people with disability relies on actions across a range of different policy areas and service systems, and strong governance that can drive the actions necessary to bring about change.<sup>13</sup>

While there is no doubt that building individual capital in the labour market is crucial and programs like DES do incredibly important work, there is a need to look at the ecosystem more broadly and do things differently to create greater change – and a Centre of Excellence that focuses on the whole disability employment ecosystem is an important enabler.

## **The whole ecosystem includes employers and the broader community.**

Good policy must include a clear focus on activating employers to grow the demand for workers with disability and changing the systems, structures and attitudes that create barriers to participation if real impact in addressing economic inclusion is going to be achieved.

A well designed and resourced Disability Employment Centre of Excellence can play a crucial role in bringing stakeholders together, supporting employers and communities to fully understand the benefit that inclusive hiring and employing more people with disability brings to business, and to challenge attitudes, low expectations and address systemic barriers.

A Centre of Excellence would support greater policy and program coordination across policy interfaces, and measure and report on practice and outcomes across the ecosystem to influence good policy making and program design.

## **Building the evidence base and good practice.**

A Centre of Excellence would also support the development of evidence-based disability employment policy and practice that is contextualised to the Australian labour market through independent evaluation and research on good practice.

Much of the evidence that currently exists is drawn from international markets which operate differently to Australia, and program evaluation is often done by program funders in the context of concern over cost or performance, rather than to understand how implementation, practice and impact can help drive quality and continuous improvement.

Establishing evidence-based practices for disability employment in Australia is essential for fostering effective, sustainable, and impactful interventions that support the employment and inclusion of people with disability in the workforce and fostering inclusive economic growth.<sup>14</sup>

Having a Centre to publish and commission research that can strengthen and guide practice, disseminate easy to understand information and independently verify high quality and high effect approaches to supports and services will also help build greater trust, confidence, and credibility among stakeholders including people with disability, employers, service providers, policymakers, and funding agencies.

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<sup>13</sup> [Final Report - Volume 5. Governing for inclusion \(royalcommission.gov.au\)](https://royalcommission.gov.au/final-report-volume-5-governing-for-inclusion)

<sup>14</sup> [Working Future: The Australian Government's White Paper on Jobs and Opportunities | Treasury.gov.au](https://www.treasury.gov.au/working-future)

## **Increased transparency and accessible information helps everybody.**

Information, data, and reporting on disability employment is complex to find, spread across a range of platforms and often difficult to understand and use. As a result, the ecosystem is difficult to navigate, and is often perceived to be under-delivering – despite the good outcomes achieved by many people accessing key services.

To effectively engage, stakeholders need clear, consistent, and trusted information about supports, services and programs, including information about their performance and quality. As mentioned above, accessible information helps build trust. Stakeholders are then more likely to engage and participate in initiatives when they can easily understand and have confidence in the effectiveness of the strategies being implemented.

## **Who is the centre for?**

The options paper notes that the centre could assist:

- People with disability and their families
- Employment Service providers
- Employers
- Supported employment providers<sup>15</sup>
- Disability advocates

While we agree that people with disability, their families and carers, employers, and service providers should all be engaged with and benefit from the work of the Centre, it is important to recognise (as mentioned earlier) governments as a key stakeholder who should also be assisted through the core functions and outputs of the Centre.

Additionally, service providers should be expanded to include education and training providers given they play a key role in supporting transitions to work.

## **How can the Centre support the disability employment ecosystem?**

### **A comprehensive set of core functions is needed.**

As we outlined in the NESA design session – APM suggests that if the Disability Employment Centre of Excellence is going to support the disability employment ecosystem, drive more inclusive employment and ultimately increase opportunities for people with disability in the labour market there are a range of core functions it should undertake.

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<sup>15</sup> Note that in the Australia the term 'supported employment' refers predominantly to employment in Australian Disability Enterprises, which are generally segregated employment settings. Globally however, supported employment refers to employment in the open labour market with support.



Figure 1: Core Functions of a Disability Centre of Excellence



- **Resource and information dissemination:** Serve as a centralised hub/platform for accessible resources, information, and good practice guides related to disability employment. Disseminate information in a variety of ways to meet the needs of all stakeholders. Act as a clearinghouse for research and publications, and actively promote available information and resources.
- **Research and evaluation:** Bring together expertise on disability employment. Publish research, identify knowledge and practice gaps, and commission work to fill those gaps. Undertake independent evaluation and analysis of programs, interventions and supports, and build the evidence base for good practice. Collaborate locally and globally.
- **Capacity development and technical assistance:** Design and offer training, development and capacity-building initiatives for all stakeholders. Deliver technical assistance including the translation of research and evidence into practice guidance and training tools.
- **Community and employer engagement:** Conduct outreach programs and campaigns to raise awareness, reduce stigma, and educate people with disability, their families, employers and communities about the opportunities and benefits of inclusive employment.
- **Quality and performance:** Support continuous improvement and innovation, fostering a culture of quality, performance and learning adaption through the independent monitoring, management and reporting on performance, quality, complaints, and feedback. This approach would separate the role of regulation from funding and policy decisions.
- **Data and reporting:** Collect, analyse and report on data related to the employment outcomes for people with disability. Take carriage of disability employment related datasets under the National Disability Data Asset. Support more regular collection and release of employment related data

such as that collected via the Survey of Disability, Aging and Carers.<sup>16</sup> Data collections and reporting should also include employer workforce reporting on disability employment (see note on employer reporting below).

- **Best practice and innovation:** Identify and grow good practice leveraging the research, evaluation, technical assistance and quality and performance functions. Support the piloting and trialling of new approaches and foster innovation.
- **Policy advice and advocacy:** Leveraging the research, evaluation, and data, provide independent advice and demonstrate the need for specific interventions and policies to support greater disability employment. Engage with policymakers to influence inclusive policies at local, regional, and national levels. Policy advice could include (but not be limited to) program design, costing and service pricing.

## A note on employer reporting.

More needs to be done to ensure that employers are fully incentivised to increase their engagement with potential employees with disability, implement inclusive hiring practices and create inclusive workplaces. As discussed earlier in our response, the current approach is heavily supply-side focussed, and most demand-side approaches tend to be working with those who are already committed to employing people with disability.

APM believes that what gets measured, gets done.

Consideration should be given to the role of targets and/or reporting to drive permanent cultural change in the hiring approaches to people with disability – both within government and the private sector. Targets are one of the most frequently used policy measures to promote employment opportunities for persons with disabilities globally, with over 100 countries having legislated employment quotas in place<sup>17</sup> and many of those countries ranking higher than Australia in employment of people with disability.<sup>18</sup>

While legislated quotas are generally coupled with incentives and/or penalties (often financial) relating to the achievement of targets, reporting mechanisms such as those required under the *Workplace Gender Equality Act 2012* (Cth)<sup>19</sup> can be a softer approach that may still drive positive employer behaviour and should be explored. This aligns with key recommendations made by the DES Reference Group that a Disability Employment Centre of Excellence adopt and/or trial functions of a potential Workplace Disability Equality Agency comparable to the functions of the Workplace Gender Equality Agency.

It should be noted here however that to date, reporting against targets has failed to deliver greater employment outcomes for people with disability in the Australian Public Service to date and stronger approaches like legislated quotas are more likely to deliver the desired results.

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<sup>16</sup> Alternatively, disability employment data points could be added to the monthly labour force statistics collected by the ABS.

<sup>17</sup> [II-Promoting Employment Disabilities VOL 1 \(ilo.org\)](https://ilo.org/publicationsnew/2019/04/05/II-Promoting-Employment-Disabilities-VOL-1)

<sup>18</sup> [Disability, Work and Inclusion : Mainstreaming in All Policies and Practices | OECD iLibrary \(oecd-ilibrary.org\)](https://oecd-ilibrary.org/publications/disability-work-and-inclusion-mainstreaming-in-all-policies-and-practices)

<sup>19</sup> [Workplace Gender Equality Act 2012 \(legislation.gov.au\)](https://www.legislation.gov.au/ulinks/rowselect?source=collection&from_browse=true&from_collection=true&from_group=true&from_publication_date=2012-06-01&from_publication_title=Workplace+Gender+Equality+Act+2012)

## How should the Centre be structured?

### **An independent agency provides greater authority.**

While there are any number of models that Government could adopt for the Centre, APM believes based on core functions that an independent statutory body is the best option.

Establishing the Centre as an independent statutory body means it would be enabled by legislation and able to undertake the broad range of functions we think are necessary for it to fulfil its potential and truly drive more inclusive employment. We also agree that this model is most likely to elevate the importance of disability employment with the public and business, which is needed.

It also provides a level of independence that means it can effectively provide advice and advocacy to government, and the structure would provide authority related to regulation, reporting and enforcement that could have a real impact on employers and driving demand (as detailed above).

Further, an independent body can draw in expertise from public and private organisations, research bodies, universities and the broader community, without being embedded within any specific institutional setting – ensuring the best and broadest representation and specialisation can be achieved.

### **Co-designed and governed by people with disability.**

Whatever the structure, a diverse range of people with disability should be involved in not only the design of the Centre, but the governance of its operation.

Like the National Disability Insurance Agency, we would recommend that the Board include people with disability, and that advisory committees also be established.

We would also recommend that service providers and employers are represented in the governance arrangements.

### **Considering the Centre in the broader disability policy landscape.**

As the Department pointed out at the NESAC conference, the disability employment ecosystem is a system within systems.

Perhaps most critically, it sits within the broader disability ecosystem, which is undergoing change – primarily as a result of the DRC and the pending recommendations of the NDIS Review.

A key recommendation of the DRC is the establishment of the National Disability Commission (NDC)<sup>20</sup> as an independent statutory body to:

- support the realisation of the human rights of people with disability (including the right to work)
- monitor and report on outcomes for people with disability across Australia, and
- promote best practice approaches to improving outcomes for people with disability by sharing information

The DRC recommended that the NDC be established by mid-2025.

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<sup>20</sup> [Final Report - Volume 5, Governing for inclusion \(royalcommission.gov.au\)](#)

We also know that the NDIS review is likely to make recommendations related to governance, regulation, quality, and performance management.

It is important that the Disability Employment Centre of Excellence, where it sits, and how it operates is considered in the context of these recommendations.

## Where to start?

### Set a solid foundation to build on – build awareness, evidence and capability.

We agree that the priority functions needed at the establishment of the Centre are:

- establishing, developing, and maintaining the evidence base
- building evidence-informed good practice tools and resources
- delivering training and support to build the capacity of employment service providers

We also support that these are the foundations upon which the Centre will be built over time, and it will be important that the implementation timeline includes indications of when these future phases are developed. Ideally, having the Centre fully established as an independent body by July 2025 and aligned to the commencement of the new disability employment model would be the ideal – particularly given this also aligns to the DRC recommendations on an NDC.

In respect to building evidence informed best practice tools – we agree the Centre should collaborate with existing research institutions; however, we would not want to see partnerships developed that restrict the institutions and organisations that can work with the Centre on these important projects.

The development of a central digital platform to house the Centre and create a single source of truth for information and resources (including training) on disability employment should also be prioritised. While this could build on current platforms such as JobAccess or the Disability Gateway, this would require an update to functionality, and it may make more sense to start from scratch with a bespoke platform co-designed with stakeholders.

## Conclusion

As mentioned at the outset of this submission, APM welcomes the opportunity to contribute to this important discussion.

A Disability Employment Centre of Excellence has the potential to change the disability employment ecosystem and drive more inclusive employment and greater opportunity for all people with disability. Further, benefits can be achieved without requiring wholesale change of the current systems and programs which have proven their potential to deliver by providing a greater level of support and intelligence for the sector, meaning current programs may be better enabled to reach their fully intended effectiveness.

We would welcome the opportunity to discuss the feedback and ideas raised in this paper with the Department in more detail.