



24 November 2023

Australian Government  
Department of Social Services  
[COE@dss.gov.au](mailto:COE@dss.gov.au)

## **Establishing a Disability Employment Centre of Excellence Options Paper**

To whom it may concern,

Deafness Forum Australia is the peak representative body representing the views and interests of the more than 4 million Australians who live with hearing loss, people with hearing difficulties, have ear or balance disorders, people who communicate using Australian Sign Language, those who are deafblind, and their families and supporters.

Deafness Forum appreciates the opportunity to provide feedback on the Department of Social Services proposal on the development of a Disability Employment Centre of Excellence (the Centre).

Access to employment, for those with disability, can be transformational.

Employment is necessary for financial independence, increased standards of living and physical and mental health.<sup>1</sup> Being employed, builds self-confidence, increases knowledge and skills and enhances opportunities for social connection and inclusion within community.<sup>2</sup>

Anyone with disability who chooses to work should be provided with the supports and services they need to pursue meaningful employment, across the hours they choose, while being paid fairly to do so.

People who are hearing impaired, have disorders of the ear or are deaf, have consistently told us that they are able to work, and more importantly want to work and contribute to Australia's economic future.<sup>3</sup> Despite this, the deaf and hard of hearing community are being left behind – current ABS data indicates that 8.2% of people aged between 15-64 with sensory and speech disabilities, are unemployed, in comparison to 5% of people aged between 15-64 without disability,<sup>4</sup> and can experience barriers at multiple points across their employment 'journey'.

A study of the job seeking experiences of people who are deaf or hard of hearing with access to employment support services in 2012, indicated that around than half of

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<sup>1</sup> Ross CE and Mirowsky J. *Does Employment Affect Health?* Journal of Health and Social Behaviour 1995, Vol. 36 (September): 230-243.

<sup>2</sup> Ibid.

<sup>3</sup> Deafness Forum Australia, 2020, *Submission to the Disability Royal Commission into Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, Employment Issues Paper* <[Submission-to-Disability-Royal-Commission-Employment-Issues-Paper-18May2020.pdf \(deafnessforum.org.au\)](#)> at p.3.

<sup>4</sup> Australian Bureau of Statistics, 2019. *Microdata: disability, ageing and carers, Australia*, 2018. ABS cat. no. 4430.0.30.002. Canberra: ABS. Australian Institute of Health and Welfare (AIWH) analysis of TableBuilder quoted in 2022, *People with disability in Australia*, web report <[People with disability in Australia, Unemployment - Australian Institute of Health and Welfare \(aihw.gov.au\)](#)> accessed 21 November 2023.

respondents felt that the employment services were not useful in supporting them to secure employment.<sup>5</sup>

## **Barriers to securing and maintaining employment.**

In the workplace, employment challenges typically reported by people who deaf and hard of hearing, can be defined as **attitudinal, environmental or systemic**.<sup>6</sup>

**Attitudinal barriers** typically exist in workplace cultures that are inherently resistant to change, characterised by employers who assume that people with disability will be more expensive to employ, either in terms of time and resources, and that people with disability will be more 'needy', and less competent than other employees. In these workplaces, employers fail to recognise, and accordingly address, the additional workplace challenges and stresses that a deaf or hard of hearing employee can experience. Attitudinal barriers serve to isolate and devalue people with deafness and hearing loss.

**Environmental challenges** relate to a lack of physical and equivalent access to supports that are necessary for an employee with disability to participate equitably in the workplace. In the context of deafness, this might include real time communication supports being unavailable during certain workplace events and activities, or an employee being ineligible to receive workplace supports via the Employee Assistance Fund.<sup>7</sup>

**Systemic barriers** include inherently discriminatory job advertisements and recruitment processes, such as not enabling hearing impaired and Deaf people to enquire about jobs and accept offers of interviews by methods other than using the telephone, where there are a lack of appropriate employment or career advancement opportunities available for people with disabilities, or where workplace training and skills development activities are otherwise inaccessible.<sup>8</sup>

We know that such barriers are not unique to people who live with hearing loss. Existing government interventions to increase rates of employment for the estimated 2.1 million people<sup>9</sup> with disability of working age across Australia are simply not working. 13 years after the introduction of Australia's original National Disability Strategy, an individual of working age with disability is significantly less likely to be employed than someone without disability

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<sup>5</sup> Connelly, L., *Labour force activities, barriers and enablers for people with a hearing loss: The Workforce Barriers and Incentives Study*, ACERH Research Report Number 13 September 2012, Australian Centre for Economic Research on Health (ACERH) p 16.

<sup>6</sup> Deafness Forum Australia, 2020, op. cit., p 3.

<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

<sup>9</sup> Australian Bureau of Statistics. (2018). *Disability, Ageing and Carers in Australia: Summary of Findings 2018*, Table 1.1 Persons with disability, by age and sex, 2003, 2009, 2012, 2015 and 2018, estimate, released 24 October 2019 <[Disability, Ageing and Carers, Australia: Summary of Findings, 2018 | Australian Bureau of Statistics \(abs.gov.au\)](https://www.abs.gov.au/australian-bureau-of-statistics/publications-and-media-releases/feature-stories/20181024-disability-ageing-and-carers-australia-summary-of-findings-2018)> accessed 22 November 2023.

(53% compared to 84%)<sup>10</sup> and will typically earn less<sup>11</sup>, be more likely to work part-time<sup>12</sup>, and be unemployed for longer periods of time.<sup>13</sup>

To resolve this gap, we need to address negative societal preconceptions about the employability of people with disability and assist employment service providers and employers to understand the value of the disability community as a capable workforce that is currently underutilised.

Employment service providers and employers need to not only understand, and comply with, their statutory obligations as employers of people with disability, to provide safe and inclusive workplaces, but to also appreciate what it means to provide 'good' practice in the context of supporting people with disabilities, both as jobseekers and as employees.

## **Our expectations of a Disability Employment Centre of Excellence.**

The Disability Employment Centre of Excellence provides an opportunity to support these ambitions. We envision the Centre as a disability-led, agency which will promote and advance employment equality for people with disability in employment and the workforce. It is important that the Centre is either established through legislation as a stand-alone statutory agency or formed as a part of an existing independent body, such as the Australian Human Rights Commission, to retain a level of independence from Government to satisfy public expectations of impartiality.

The Centre should increase public awareness of current inequities experienced by people with disability, while facilitating practical, evidence-based solutions through public and private sector collaboration. It should provide targeted information and training to support disability employment providers, employers, people with disability, and their advocates to understand inclusive practice as it relates across all forms and levels of employment, from junior level recruitment to executive level.

The Centre should also support people with disability who seek to be self-employed and those who choose to participate in unpaid work opportunities, as pathways to paid work, such as internships and student work experience placements.

Priority focus populations for the purposes of support would include younger people with disability, those from culturally and linguistically diverse backgrounds, people with disability who identify as Aboriginal or Torres Strait islander, older persons with disabilities, people with disability who identify as LGBTIQ+ and those with profound or severe disability, in

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<sup>10</sup> Australian Bureau of Statistics. (2018). *Disability, Ageing and Carers, Australia: Summary of Findings*. ABS. <<https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>> accessed 21 November 2023.

<sup>11</sup> 8.8% of people with disability in the labour force lived in a household in the lowest quintile for equivalised gross household income versus 4.4% of people without disability – Australian Bureau of Statistics (2020) *Disability and the Labor Force*, web article < [Disability and the labour force | Australian Bureau of Statistics \(abs.gov.au\)](https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release)> accessed 21 November 2023.

<sup>12</sup> 40.9% of people with disability of working age who are employed work part-time versus 31.7% of employed working age people without disability – Australian Institute of Health and Welfare, 2022, *People with disability in Australia*, web report < [People with disability in Australia, Employment rate and type - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports/100/people-with-disability-in-australia)> accessed 22 November 2023.

<sup>13</sup> Australian Institute of Health and Welfare, 2022, *People with disability in Australia – Unemployment*, web report <[People with disability in Australia, Unemployment - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports/100/people-with-disability-in-australia)> accessed 22 November 2023.

recognition of additional intersectional challenges such groups can experience when seeking and maintaining employment.

## **Our recommendations.**

Deafness Forum's priorities for the responsibilities of the Centre (in no specific order):

### **1. Translating current research into practical resources**

A key role of the Centre should be to translate current academic research on good disability inclusive employment practices into practical information and resources for employment service providers, employers, and people with disability. This information should be freely and accessibly available to the public.<sup>14</sup>

### **2. Providing disability inclusion training for employers and employment service providers**

The Centre should develop a nationally recognised disability accreditation program for disability inclusion, targeted at employment service providers and employers.

The program should be evidence-based and developed in co-design with people with lived experience of disability.

Employment service providers and employers could be incentivised to engage in the program through the offer of a form of publicly recognised indicator which could be displayed by the employment service provider, or employer, on completion of the program.

### **3. Supporting employers and employment service providers to develop Disability Action Plans (DAPs)**

The purpose of a Disability Action Plan is to '*encourage, recognise and promote an active commitment to eliminating disability discrimination and to promote the recognition of the rights of people with disability*'.<sup>15</sup> The value of a Disability Action Pla is that it sets out a *blueprint for change that is short, action oriented, time-sensitive and measurable*.<sup>16</sup>

The Centre should promote the existing work of the Australian Human Rights Commission in promoting the use of Disability Action Plan for all employers and employment service providers.

### **4. Fostering collaboration via communities of practice**

Disability workforce inclusion is a whole of society issue, requiring the commitment of both the private and public sectors.

The Centre could act as a conduit for collaboration across government, private employers, disability service providers, support workers, employees and other key stakeholders via communities of practice.

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<sup>15</sup> Australian Human Rights Commission (2021) *Disability Action Plan Guide 2021*, at p. 10

<sup>16</sup> *Ibid.*

## 5. Creating a disability inclusive employer of choice recognition program.

The Centre should coordinate and implement a voluntary nationwide employer of choice recognition program, akin to the program being run through the Workplace Gender Equality Agency, recognising organisations' active commitments towards workplace gender equality.<sup>17</sup> This program should be strategically aligned with the *Disability Discrimination Act 1993* (Cth).

## 6. Collect, analyse and publish data to track progress.

The Centre should aim to collect, analyse and publish world-leading data on workplace equality for people with disabilities. A mandatory reporting model for employers and employment service providers with a focus on key indicators, like the current Workplace Gender Equality Agency's compliance reporting model<sup>18</sup>, would provide critical data to track progress and provide a level of external accountability for employers and disability service providers aiming for continual improvement.

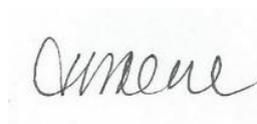
The Centre may be well positioned within the Australian Human Rights Commission, as Australia's national human rights institution, noting that the Commission already undertakes various policy development and research tasks to advance equitable employment for people with disability, and has achieved substantial success with its recent IncludeAbility employment pilot.

We also note further synergies: a long-term project for the Commission has been the development of National Standards for Disability Employment, and that the Commission has carriage of the Disability Action Plan Register.

Deafness Forum Australia welcomes any questions the Department may have, and does not require confidentiality for this letter, which can be made publicly available.

We thank you for the opportunity to comment.

Yours sincerely,



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<sup>17</sup> Australian Government, Workplace Gender Equality Agency, website, *WGEA Employer of Choice for Gender Equality citation* <[WGEA Employer of Choice for Gender Equality citation | WGEA](#)> accessed 22 November 2023.

<sup>18</sup> Australian Government, Workplace Gender Equality Agency, website, *Reporting gender equality performance* <[Reporting gender equality performance | WGEA](#)> accessed 23 November 2023.