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By email: COE@dss.gov.au

DCA submission in response to Establishing a Disability Employment Centre of Excellence Options Paper October 2023

Dear Secretary, Department of Social Services, Ray Griggs

Thank you for the opportunity to provide feedback on your Options paper: *Establishing a Disability Employment Centre of Excellence, October 2023*.

Diversity Council Australia (DCA) is the independent not-for-profit peak body leading diversity and inclusion in the workplace. We have over 1,300 member organisations, reaching approximately 20% of the Australian labour market.

The idea of a 'one stop shop' providing information and an evidence-based Community of Practice to improve access to employment for people with disability is of significant interest to DCA and our member organisations.

A note on language:

DCA recognises that a diversity of terms is used to describe people's lived experience. We recognise and respect individuals' right to identify with terms that they feel most comfortable with. We also recognise the limitations of binary language. However, sometimes binary categories have very real effects on peoples' experiences and may be necessary to convey the gendered nature and dynamics of our society.

DCA uses person-first language by using the term 'people with disability' but we recognise that many people with disability prefer identity-first language (i.e. a disabled person). We also acknowledge the diversity in disabilities and the impact this has on the experiences of people. Furthermore, some specific communities such as Autistic and Deaf communities may not define themselves as disabled at all.

DCA recognises that language is socially constructed and constantly evolving and our intention is always to be inclusive and to be open to change.

A note on intersectionality:

DCA recommends an intersectional approach when developing and implementing policy and programs and, in this case, the development of a model for the Centre. Intersectionality refers to how some people experience compounded discrimination due to multiple marginalising and

interlinked characteristics.¹ An intersectional lens on the lived experience of people with disability will add significant value to inform the development of an appropriate model for the Centre.

Comment:

Diversity Council Australia (DCA) welcomes the formation of a Disability Employment Centre of Excellence (the Centre). [Our research](#)² shows that people with disability are amongst the highest groups experiencing discrimination and/or harassment at work compared to workers from mainstream or majority groups. Attaining employment for people with disability is itself a challenge. The Australian Institute of Health and Welfare³ suggests working-age people with disability are twice as likely to be unemployed as those without disability. A 'one stop shop' to support people with disability attain and thrive in employment is urgently needed and DCA commends the Department for progressing this initiative.

Some specific comments are included below:

1.1 Why do we need a Centre?

The Royal Commission Into Violence, Abuse, Neglect and Exploitation of People with Disability⁴, in their final report, stated that the vision for an inclusive Australia is of a future where people with disability "live, learn, work, play, create and engage together with people without disability in safe and diverse communities"⁵.

The Commission identified systemic barriers people with disability face obtaining and retaining employment including attitudinal barriers, physical and environmental barriers, organisational and structural barriers. The proposed Centre of Excellence will address many of the issues raised by the Royal Commission by providing a 'one stop shop' for information, research, training and evidence-based practice resources to support people with disability in employment.

1.2 What should be the core functions of the Centre?

Evidence-based practice:

DCA has particular expertise in conducting unique research and developing evidence-based practical tools to assist employers in their diversity and inclusion initiatives. We welcome the opportunity to collaborate with the Centre on research, practice guides and related capacity building initiatives to support improvements in the employment experience of people with disability.

Capacity-building function:

DCA is very supportive of the Centre providing a capacity-building function for the whole sector. DCA offers a range of learning opportunities to build the capacity of Australian workplaces to better support diversity groups and would welcome the opportunity to collaborate with the Centre on training programs, events and the development of training and professional development materials.

In planning and implementing the resource development function, DCA strongly suggests that resources produced need to be accessible, plain-English and practical. Our experience has highlighted the need to consider how any resources developed will be received by small businesses, employers from disadvantaged social classes and employers who are resource poor and without HR expertise.

Quality control function:

DCA supports the proposed key quality control function of the Centre.

Data consolidation:

As mentioned earlier, DCA conducts unique research and would welcome the availability of quality data and benchmarks across the sector.

Accessible information and resources:

DCA strongly supports the availability of accessible information for people with an intellectual disability.

Collaboration, cooperation and information sharing:

A Community of Practice, coordinated by the Centre, is one of the key ways in which practice within the sector can benefit most. DCA strongly supports this function.

2.1 Who can the Centre assist? Are any groups missing?

Centring Voices of lived experience:

DCA believes this Centre could provide services to people with disability and their families, employment service providers, employers, supported employment services and disability advocates.

DCA's [research](#) provides ample evidence that women are twice as likely to provide unpaid care of a person with disability⁶. This is a key contributor to the gender pay gap. This Centre could provide much needed support to families as well as other stakeholders and address the lack of shared care in this country which contributes to economic inequality for women.

DCA strongly supports a focus on the Voices of lived experience of the diversity of people with disability. Only by centring these Voices – prioritising and acting on what people with lived experience are telling us – can the marginalisation experience of people with disability be properly heard.

Intersectionalities:

As referred to earlier, DCA supports the application of an intersectional lens to better understand the experience of people with a number of marginalised identities such as a person with disability who is also LGBTIQ+ or from a culturally and racially marginalised background.

2.2 How can the Centre work with stakeholders to increase the employment rate for people with disability?

DCA is the independent not-for-profit peak body leading diversity and inclusion in the workplace. DCA is also connected to similar organisations in a number of other jurisdictions through a [Global Inclusion and Diversity Alliance](#) (GIDA).

DCA believes that working together with the Centre, in the spirit of collaboration, will bring the benefits of areas of expertise and knowledge to the work of the Centre, especially in relation to research, developing evidence-based resources and tools and capacity building.

2.3 What can the Centre do to increase the capability and capacity of employment service providers?

Building on a foundation of knowledge, expertise and lived experience of people with disability, the Centre should also increase the cultural and racial literacy of all stakeholders, and their understanding of intersectionalities. There are a number of [Knowledge Programs](#) and other educational services offered by DCA to its members, as well as programs currently under development, that may be of value.

Questions 3 and 4 relating to preferred model and implementation:

Preferred model:

DCA believes a Research Centre model can best advance collaborative research which would provide the evidence to develop resources, training products and inform best practice in disability employment.

Conclusion:

DCA welcomes the prospect of working collaboratively with the Centre and can bring our expertise in diversity and inclusion research and education to the partnership. Our practitioner approach to research and education, particularly our expertise in developing evidence-based practical guides and tools, would complement the Centre's research and education functions very well.

Please feel free to contact myself or Jacqueline Braw, Senior Advocacy and Government Relations Manager, on jacqueline@dca.org.au should you require any further information about this matter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'L. Annese', with a long horizontal flourish extending to the right.

Lisa Annese
Chief Executive Office

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- ¹ Diversity Council Australia (V. Mapedzahama, F. Laffernis, A. Barhoum, and J. O'Leary). *Culturally and Racially Marginalised Women in Leadership: A framework for (intersectional) organisational action*, Diversity Council Australia, 2023.
- ² *Inclusion@work Index. Mapping the state of inclusion in the Australian workforce. Synopsis Report*, Diversity Council Australia, 2022.
- ³ [People with disability in Australia, Unemployment - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au)
- ⁴ [Final Report | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)
- ⁵ [A brief guide to the Final Report \(royalcommission.gov.au\)](#), Page 7.
- ⁶ Diversity Council Australia. *Let's Share the Care at Home and Work. A call to action to reduce the gender pay gap*. Diversity Council Australia, May 2019.

