

**Response to the Establishing a Disability Employment Centre of
Excellence Options Paper October 2023**

QDN

QUEENSLANDERS WITH DISABILITY NETWORK
NOTHING ABOUT US WITHOUT US

About Queenslanders with Disability Network (QDN)

Queenslanders with Disability Network (QDN) is an organisation of, for, and with people with disability. The organisation's motto is 'Nothing about us without us'. QDN operates a state-wide network of over 2,000 members and supporters who provide information, feedback and views from a consumer perspective. This informs systemic disability policy and disability advocacy and co-design initiatives, towards the full inclusion of people with disability in the social and economic life of their community.

Introduction

The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (the Royal Commission) received significant evidence and information demonstrating the systemic barriers to employment for people with disability. The impact and persistence of these barriers is demonstrated by the significantly lower labour force participation rates for people with disability compared with people without disability.

Evidence submitted to The Royal Commission includes data most recently collated by the Australian Bureau of Statistics in 2018 demonstrating a labour force participation rate of 53 per cent for people with disability aged 15 to 64,¹ compared with 84 per cent for people without disability.² The participation rate for people with disability has not changed substantively since 1993.³ The Australian Government has acknowledged that the percentage of people with disability in the workforce did not increase between 2009 and 2018.⁴

This is despite the implementation of the Disability Employment Strategy (2021), the New Disability Employment Support Model (2022) and significant investment in the economic participation of people with disability through Information Linkages and Capacity (ILC) grants.

Having a job is not only essential to a person's economic security, but gives people a sense of purpose and achievement, which is central to fostering good mental health and creating an enriched life, free from poverty.

Employment is an important issue for Queenslanders with disability and QDN members have contributed their experiences regarding employment, reflecting on the importance of access, support and retention, and giving personal accounts of seeking and being in employment.

QDN members have a diversity of disability and this is reflected in their experiences in employment. Many experienced discrimination, some experienced employment services positively and some

¹ National Disability Insurance Agency, Employment outcomes for NDIS participants, Report, December 2020, p 5; Exhibit 22-8, 'Statement of Debbie Mitchell', 31 March 2022, at [16].

² Exhibit 22-7, 'Statement of Laurie Leigh and Kerrie Langford', 7 April 2022, at [45–46]; Exhibit 22-8, 'Statement of Debbie Mitchell', 31 March 2022, pp 6–7 [30].

³ Submissions of Counsel Assisting the Royal Commission following Public hearing 22, 19 July 2022, [6].

⁴ Exhibit 22-10, 'Supplementary statement of Gerrie Mitra', 6 April 2022, at [19].

experienced them very negatively. Activity to support employment outcomes for people with disability needs to reflect this diversity and individual unique experience.

Engaging with people with disabilities and seeking to co-design strategies and activities will ensure diversity is addressed and inclusive strategies developed.

Ultimately, people with disability are looking for the same opportunities as everyone else – better health care, a quality education, a secure job, a safe place to live, and more time with the people they love.

QDN supports action and strategies which deliver employment outcomes and long-term sustainable employment for people with disability.

Response to Questions

1.1 Why do we need a Centre?

A Disability Employment Centre of Excellence (the Centre) that is co-designed with people with disability and has clear goals and measures for success has the potential to deliver the following outcomes:

- Increased and meaningful employment opportunities for people with disability leading to economic equity
- Capacity building opportunities for employers and employment service providers
- Increased inclusive and accessible workplaces committed to employment targets
- Education and awareness raising for both employers and the general public reducing negative attitudes towards people with disability promoting a more inclusive society
- Benefits to businesses including increased productivity, retention and innovative thinking
- Increased research and innovation identifying best practice and new approaches supporting inclusion of people with disability in workplaces
- Positive economic impacts both for individuals who gain financial independence and for society by tapping into a broader labour market.

One of the significant challenges people with disability confront is discrimination driven by ignorance and prejudice. As reported by Dr Ben Gauntlett, Disability Discrimination Commissioner, in his speech to the Jobs and Skills Summit, 50% of all complaints made to the Australian Human Rights Commission concern disability discrimination, many of which are in employment.⁵ Other barriers include lack of awareness of rights, high unemployment rates shrinking demand, inappropriate or lack of assistance to get work, employers unaware of reasonable adjustment, difficulty in accessing training and qualifications.

In this context a Centre which is co-designed, comprehensive, needs-based and evidence-based, and underpinning Australia's Disability Strategy 2021-2031 will be welcome. This approach needs to be a concerted and comprehensive effort to transform the employment market for people with disability.

⁵ Gauntlett, Dr B, Disability Discrimination Commissioner, Australian Human Rights Commission, <https://humanrights.gov.au/about/news/speeches/disability-discrimination-commissioners-speech-2022-jobs-and-skills-summit>

1.2 What should be the core functions of the Centre?

Increase the capacity of employers and employment service providers

In a report prepared for the Royal Commission, *The United Nations Convention on the Rights of Persons with Disabilities: An assessment of Australia's level of compliance*,⁶ Emeritus Professor Ron McCallum AO points out that Article 27 of the Convention on the Rights of People with Disability (CRPD) obliges governments to prevent discrimination in employment and to make places of work inclusive and fully accessible to people with disability.⁷

In Professor McCallum's assessment:

Australia is complying with article 27 of the CRPD, even though its employment programs have not succeeded in altering the labour force participation rate of persons with disabilities. Given Australia's low rate of employment for persons with disabilities, much more must be done to improve open labour market outcomes. It is further suggested that the Government continue to establish pathways to transition employees of [Australian Disability Enterprises] into the open labour market. Ultimately, what remains is a change of attitudes towards persons with disabilities in the workforce by employers, employees and the general community.⁸

Recommendation 7.17 of the Royal Commission states The Australian Government Department of Social Services should develop a suite of accessible education and training resources for providers of Disability Employment Services to upskill their staff. Resources should be co-designed by people with disability and address gaps in disability awareness, cultural competence, human rights, customised employment, employer engagement and guidelines and procedures.

Practical strategies and actions suggested by the Royal Commission recommendations align with what we have heard from QDN members. Building the capacity of employers and employment service providers through a co-design process with people with disability should be a high priority of the Centre.

Best practice/framework/standards for workplace adjustments

QDN Members convey that providing flexible work arrangements to meet individual needs of employees, and where necessary negotiating workloads, providing equal access to upskilling, training, acting in higher duties and selection for higher roles for people with disability are all goals to improve employer culture and practice.

This is the essence and foundation of the National Disability Employment Strategy around building a workforce strategy which can address current gaps. A nationally consistent framework or standards for workplace adjustments could be explored and tested by the Centre. A step towards this would be to

⁶ [Research Report - The United Nations Convention on the Rights of Persons with Disabilities - An Assessment of Australia's Level of Compliance 0.docx \(live.com\)](#)

⁷ National Disability Insurance Agency, Employment outcomes for NDIS participants, Report, December 2020, p 5; Exhibit 22-8, 'Statement of Debbie Mitchell', 31 March 2022, at [16].

⁸ Australian Government Solicitor, Report on the key elements of the legislative framework affecting people with disability, Report prepared for the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, December 2020, p 237 [39]; Ron McCallum, *The United Nations Convention on the Rights of Persons with Disabilities: an assessment of Australia's level of compliance*, Report prepared for the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, October 2020, pp 133–34.

support the implementation of recommendation 7.21 of the Royal Commission suggesting the Australian Public Service Commission introduce consistent adjustment principles and adjustment passports making it easier for people with disability to transition into and between places of employment.

Research and Innovation

Data around employment of people with disability needs to be managed better by the enhancement of data collection methodologies, research, the management of databases and improvement in how data is used. Measures should involve clear targets, qualitative data on work outcomes of people with disability and marketing the success stories widely.

Employment is changing at an unprecedented rate because of technological developments, a key enabler of inclusion and accessibility. This could accelerate or hinder progress for people with disability. It is essential that the Centre accounts for how workplaces should transform in an inclusive way by embracing technology in inclusive ways. This could be achieved in partnership with technology focused centres creating an opportunity for training around the use and adaptation of technology.

Awareness Raising

A prominent theme in consultation with our members over the years is that community attitudes to people with disability and their potential as workers and contributors to the community needs to change and be challenged.

Workplaces are in a unique position to influence communities and instill a 'whatever it takes' attitude to underpin wider campaigns and information dissemination around inclusion and accessibility. The Centre in partnership with stakeholders could play a pivotal role in this work.

Policy and Systems Advocacy

Lifting employer capability will not necessarily translate to increasing demand. Demand is tied to economic viability, the health of the economy and whether Government economic policies stimulate the economy sufficiently to increase demand for employment across the board. Through strategic partnerships and research, the Centre would be in a prime position to influence government at Federal level.

Systemic barriers have been experienced by QDN members in the education system around inaccessible campuses and materials, challenges receiving baseline education and the need for smoother transitions from school to work.

The Centre could also play a pivotal role in advocating for employment quotas in all workplaces, not just government. For example, advocating for non-compliance taxation, where companies must pay additional taxes if they do not employ sufficient numbers of people with disability. Initiatives like this have been successfully implemented in many other countries including Italy and France.

Who could the Centre assist?

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

To close the gap in employment outcomes, the Centre will need to make efforts towards understanding the diversity of approaches needed to address the intersectionality of disadvantage people with disability face. Specifically, people with disability facing overlapping and interdependent systems of discrimination related to their identity including cultural background, sexual orientation, education, economic status, gender, religion and age.

While it is noted university partnerships are referred to in the Options Paper, QDN recommends specifically influencing academic researchers to open their research agenda to be more inclusive of people with a disability. This may involve providing training, literature and support for ethical clearance. Doing so can accelerate the required transformation at all levels of employment, not only the end point of someone being offered a job.

QDN members suggest the Centre provide an opportunity to reinforce the work of Job Access. Specifically, a strong national campaign and messaging around the benefits offered to employers and how to access them.

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

Supporting employment outcomes for people with disability is part of a broader and changing policy landscape in which each level of government has a responsibility for delivering on improved employment outcomes for people with disability as do businesses and communities.

Within this changing legislative and policy landscape, it is critical that the Centre deliver governance, accountability mechanisms and ways of measuring outputs and outcomes that are informed by people with disability.

QDN identifies one of the risks associated with a broad strategy around the Centre is its focus on aspirational outcomes, without clear articulation of stakeholder roles and responsibilities in achieving tangible outcomes and meaningful change.

Australia's Disability Strategy outlines the roles of actors in the system as well as provides a clearly articulated outcomes framework for the key policy priorities including employment. This provides a solid foundation from which to build an effective monitoring, evaluation and learning framework to support employment outcomes for people with disability.

The proposed Disability Employment Centre of Excellence provides an opportunity to bring together all these pieces into a coherent whole. The Centre must be developed with people with disability and the ongoing work must be co-designed and include:

- Collaborative governance;
- Clear goals, targets and indicators for measuring success in employment for people with disability;
- Framework for innovation and testing new approaches;
- Clear connection to jurisdictional and community led activities.

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

The Centre must support the Royal Commission report recommendations 7.16 on the priorities to be included in the new Disability Employment Services model and 7.17 on developing education and training resources for Disability Employment Services staff.

As part of this process QDN recommends development of a targeted strategy for employment service providers including, but not limited to:

- Inclusive and non-biased recruitment strategies and services including training and awareness raising for employers and recruitment agencies;
- Innovative options that deliver choice, open, inclusive, and accessible forms of employment;
- Employment services that meet individual needs; and
- Mentor and development opportunities for people with disability as small business owners.

What models exist?

3.1 What are your views on the models presented?

QDN members have mixed views on the models presented. All those consulted strongly agree that an Evidence-Informed Training Hub Model will deliver practical outcomes resulting in increased employment of people with disability. It was noted, however, that approaches should be innovative and co-designed with people with disability to prevent re-invention of systems that have been proven ineffective in the past.

QDN members noted that research is critical to sustain innovative approaches and critical studies of the status quo. This model would require an established translation pathway so that research findings are implemented. Feedback received from university professionals noted it is essential to train new researchers in this space so more innovation can occur, and the evidence-based practice is solid rather than anecdotal. As it stands, there is far too little expertise in Australia held by people who know how to adopt participatory approaches to research, which limits how much change can occur culturally, technologically and economically.

3.2 Are there any models for a Centre to consider that are not included in this paper?

The Models presented in the paper are sufficient to achieve objectives.

3.3 What can the Government take from existing models of Centre of Excellence? What should be ruled out?

Research Centre models such as ARC Centre of Excellences concentrate a lot of funding on specific projects and don't enable new researchers to access funding to participate and expand. This may hinder the agility required to make significant change in employment and create a view that the team receiving funding concentrate all existing efforts on the topic.

What are the next steps towards implementation?

4.1 Where could a Centre be best placed (for example, within a government agency, a university, or as a stand-alone institution?)

QDN members unanimously agreed that the Centre would be best placed as a stand-alone institution in partnership with government agencies and universities. Placing a Centre in a university could create a barrier for other talents to join in and contribute. While University partnerships will be essential, an independent location would enable genuine negotiation to take place that would ultimately benefit people with disability rather than the academic community.

4.2 Are there any other implementation issues that should be considered?

Co-design at all stages of the Centre is critical to its success and generating real outcomes for people with disability. QDN commends the Department of Social Services for considering co-design in the Options Paper.

Labour markets are spatial in nature, and as such, a place-based approach is important to ensure that the work of the Centre considers the strengths and opportunities as well as the needs of local communities.

QDN members recommend all levels of Government collaborate to have both an online and physical model in each state, not necessarily in capital cities, but rather a hub and spoke model citing regional examples as positive influences.

Place-based approaches provide opportunities for local leadership, for innovation and importantly for bringing together the diverse voices of communities to develop local solutions. They are particularly effective in driving local workforce development activities and progressing social and economic wellbeing.

Connecting place-based approaches to a strategic policy governance structure provides additional opportunities for learning to drive structural and systemic change.

There are pockets of excellence in every jurisdiction no matter what the industry. QDN members suggest developing or collaborating with already existing peer leader networks for employers to share positive stories and lessons learnt.

4.3 What elements of the proposed role of the Centre or its functions should be prioritised?

Research, development and innovation that results in real employment outcomes should be at the heart of the Centre, as there is still so much to learn before employment can be truly accessible and inclusive. With that in mind, building evidence-informed best-practice tools and resources should be prioritised in establishing the Centre.

Conclusion

QDN is pleased to present our response to the Establishing a Disability Employment Centre of Excellence Options Paper to the Department of Social Services. Our submission is a culmination of QDN members' recruitment and employment experiences.

QDN commends the Department of Social Services for this consultation and design process and supports the call for establishing a Disability Employment Centre of Excellence. QDN looks forward to further opportunities to contribute to this process.