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Submission: National Disability Employment Strategy

**QDN**

**QUEENSLANDERS WITH DISABILITY NETWORK**  
*NOTHING ABOUT US WITHOUT US*

Submitted to the Department of Social Services May 2021

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## About Queenslanders with Disability Network (QDN)

Queenslanders with Disability Network (QDN) is an organisation of, for, and with people with disability. QDN operates a state-wide network of 2,000+ members and supporters who provide information, feedback and views based on their lived experience, which inform the organisation's systemic advocacy activities. We believe people with disability should always be at the table when decisions are made that directly impact their lives.

QDN also currently hosts 21 peer support groups across Queensland, made up of people with a diverse range of disabilities, and convened by people with disability. The groups network socially, share information, life experiences and solutions, to create more inclusive lives and communities. Local groups are a safe space for people with disability to share information on topics that are of interest to them, to extend their social networks, and to build capacity and leadership skills. Groups usually meet on a monthly or bi-monthly basis and meetings can be face-to-face or virtual.

## Introduction

Queenslanders with Disability Network (QDN) welcomes the opportunity to make a submission on the development of National Disability Employment Strategy.

The multifaceted responsibilities of Government for ensuring good outcomes for people with disabilities are clearly expressed in the 2008 United Nations Convention on the Rights of People with Disabilities (CRPD). The CRPD provides the framework for Australia's international obligations across all levels of Government. QDN supports the development of a National Disability Employment Strategy that is grounded in the CRPD.

Ensuring people with disability can participate economically through employment is contingent on access to affordable and accessible housing, health services, education, transport and specialist disability services. In developing the National Disability Strategy it is critical these areas are addressed through a whole of Government approach which links across Government Departments and with the National Disability Insurance Agency.

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.

## Background

The National Disability Employment Strategy is part of the broader and changing policy landscape that includes the National Disability Agreement, the introduction and implementation of the National Disability Insurance Scheme (NDIS) from 1 July 2013 and the new National Disability Strategy 2020-2030 (NDS) which is due to be released later in 2021. Queensland also has the All Abilities Queensland: Opportunities for All: State Disability Plan 2017-2020 which is being reviewed in 2021 with linked individual departmental disability service plans that aim to deliver on the Queensland Government's vision to help build an inclusive Queensland for all Queenslanders, so the one in five Queenslanders with disability can reach their full potential as equal citizens.

QDN members support the aims and vision of the National Disability Employment Strategy for an inclusive Australian society where all people have access to meaningful work opportunities.

**Recommendation 1.** That the National Disability Employment Strategy clearly outline the linkages and accountabilities across the National Disability Strategy, the National Disability Agreement and the National Disability Insurance Scheme (NDIS) employment goals and how these Strategies will support a wholistic approach.

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

A key area of cross fertilisation is the need for a National approach to data collection and data reporting and linkages between the National Disability Strategy, State level disability plans and Strategies and Local Government Authority responsibilities. Additionally, the National Disability Employment Strategy needs to link with the NDIS whose core objectives include the social and economic participation of people with disability.

QDN identifies one of the risks associated with a broad policy strategy is its focus on aspirational outcomes, without clear articulation of each of the governments' roles and responsibilities in achieving tangible outcomes and meaningful change within a combined agreement/strategy document. Each level of government has a responsibility for delivering on improved employment outcomes for people with disability.

The National Disability Strategy and the NDES discussion paper acknowledge that 1 in 6 (18% pop) or 4.4 million people in Australia have a disability. The most common disability is intellectual disability and sensory/speech disability. People with disabilities are not a homogenous group and public policy makers need to consider the context and needs of the various subgroups including:

- Women with disabilities
- Young people (under 25) with disabilities
- Indigenous people with disabilities
- Culturally and Linguistically Diverse people with disability
- Older persons with a disability
- LGBTQ People with a disability
- People with disability experiencing homelessness

The different impacts of different disabilities, age, sex, cultural background and different context require different Public Policy responses when dealing with the issue of enhancing employment opportunities.

**Recommendation 2.** That the Department of Social Services prioritise consideration of the needs of disability subgroups as integral to the framework of formulating a National Disability Employment Strategy.

Employment is an important issue for QDN members who have informed this submission through consultation and survey about 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 diversity of disability and this is reflected in their experiences in employment. Many experienced discrimination, some experienced employment services positively and some experienced them very negatively, some supported employment subsidies and some opposed them. This diversity and individual unique experience needs to be addressed in the development of the National Disability Employment Strategy. Engaging with people with disabilities and seeking to co-design the Strategy will ensure diversity is addressed and inclusive strategies developed. Additionally, a prominent theme in the QDN Survey was that community attitudes to people with disability and their potential as workers and contributors to the community needed to change and be challenged.

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***There is a huge lack of skilled people who can understand people with complex health and disabilities. (QDN member response May 2021).***

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48% of working age (15-64) people with disabilities are employed compared to 80% without disability. This a large gap and the National Disability Employment Strategy needs to develop a longer-term plan to bridge this gap. The Covid pandemic has impacted on the job market and disproportionately impacted on the opportunities of people with disability. To reinforce the urgency Australia ranks 21 out of 29 OECD countries for labour force participation of people with disability. Importantly qualitative and quantitative data is critical to continuous improvement in the effectiveness of initiatives aimed enhancing opportunities for people with disability.

**Recommendation 3:** The National Disability Employment Strategy needs to facilitate enhanced management of employment outcomes for people with disability. Data needs to be managed better by the enhancement of data collection methodologies, research, the management of data bases 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.

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.

## **RESPONSE TO THE STRATEGY PAPER**

The Department of Social Services paper on a National Disability Employment Strategy identifies four priority focus areas. These are:

- Lifting employer capability and demand.
- Building employment skills, experience and confidence of young people with disability.
- Improving systems and services for jobseekers and employers.
- Changing community attitudes about people with disability and the workplace.

This submission will address each of these priority focus areas in turn.

## Lifting employer capability and demand

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***Start by making workplaces disability friendly. (QDN Member response May 2021)***

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People with disability experience significantly worse employment outcomes than others in the community. People with disability are willing to work and improve their economic and social participation, and routinely experience significant barriers to employment. Lack of inclusive skilling opportunities and workplaces contribute significantly to lower employment participation for people with disability in Australia. Barriers to developing employees with disability include:

- Inaccessible development programs
- Lack of opportunity to participate in skills enhancement programs
- A punitive approach to participation in labour market programs

QDN Members reinforced the need for work to occur with employers that creates a better understanding and awareness of the positives of employing people with disability.

There are still widespread misconceptions and outdated stereotypes influencing the attitudes and behaviour of employers, recruiters and government policy makers, which ultimately restrict the ability of people with disabilities to find and obtain employment. QDN members report that these assumptions can often be dispelled if the employer/recruiter has an open and honest discussion about their concerns. However, there is widespread acknowledgement that many employers/recruiters don't know how to approach these topics or don't feel comfortable having these conversations. This often leaves people with disability who are otherwise qualified for a job being overlooked.

The fastest growing jobs market is the community services sector including NDIS market and workforce. People with disability need to be recognised as part of this growing workforce as employees and targeted strategies are needed that provide pathways to employment.

QDN members have said work with employers should promote a welcoming, accessible workplace inclusive of diversity and the understanding of the needs of people with disability. Resources to help improve the accessibility of workplaces need to be deployed across workplaces with a 'whatever it takes' attitude to underpin campaigns and information dissemination.

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***Discriminating must be countered with positive discrimination efforts. (QDN member response May 2021)***

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QDN members highlighted that providing flexible work arrangements to meet individual needs of employees, and where necessary negotiating workloads, providing equal access to up skilling, 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 building a workforce strategy which can address current gaps.

This should include targeted strategies aimed at industries where skills shortages exist and with pathways to “new” jobs and should align with job readiness strategies for people with disability. Clear job pathways and the reinforcement and endorsement of “destination” employers will enhance the capacity of people with disability to access the job market and will ensure jobs are more sustainable.

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.

**Recommendation 4.** A National Disability Employment Strategy needs to set (going forward) yearly measurable targets for increasing the percentage of people with disability who are employed.

**Recommendation 5.** The National Disability Employment Strategy needs to link in with and acknowledge the wider Government role in managing the economy.

A workforce strategy will align and support other strategies that lift employer capability and confidence to take a more proactive role to recruiting in a more inclusive way.

Greater and clearer information and support, on-the-job support, role models, mentoring, storytelling and case studies are all supported particularly if they are integrated into a cohesive campaign that incorporates different mediums and media. Campaigns should be co-designed with people with disability.

Direct support to employers to assist people with newly acquired disabilities to return to work is supported and would ideally be linked in with Workcover organisations across the States and the workforce strategy.

Procurement incentives are supported. The Government providing procurement incentives to employers who support the employment of people with disabilities will encourage other employers to consider employing people with disability. This strategy needs to be promoted to all prospective employers.

QDN supports the Commonwealth Governments effort in employing people with disabilities via the *Australian Public Service (APS) and professional development programs Disability Employment Strategy 2020-2025*. The APS should enhance targeted accessible recruitment, leadership and professional development programs focussed on students at TAFE and University colleges and accessible to APS staff with disability. These programs should train potential candidates about working in the APS environment and offer opportunities for internships, student placements and project work for students and emerging leaders with disability. These opportunities should be available across the APS not just those specific to disability.

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***More support from all employer groups and organisations for diverse job positions for people with disabilities and adequate support in the workplace and training to improve skills and performance. (QDN member response May 2021)***

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## Building employment skills, experience and confidence of young people with disability.

Improving career development and tools for young people with disability during their schooling as well as school to work transition programs.

Enhancing support networks for young people and challenging attitudes and assumptions will enable enhanced support for young people. This approach should be an integrated strategy that uses education approaches as well as multimedia campaign to achieve results. Enhancing the skills of the workforce to facilitate different thinking and a different approach will help identify people's skills and opportunities for employment.

Attention needs to focus on creating and targeting flexible transition pathways including TAFE, apprenticeships, University, internships and traineeships and the role of NDIS in supporting options and pathways. Career development options and innovative paths around emerging jobs should also be included in pathway options. This approach needs wide promotion in schools, TAFE and Universities.

While focussing on young people is important it should not be at the expense of other disability sub-groups. QDN members highlighted that one size does not fit all. A strategy that works for young people may not work for older persons. Such as:

- Women with disabilities
- Young people (under 25) with disabilities
- Indigenous people with disabilities
- Culturally and Linguistically Diverse people with disability
- Older persons with a disability
- LGBTQ People with a disability
- People with disability experiencing homelessness

NDIS has provided a key focus on school lever employment supports which help participants moving from school to work in their final years of school and directly after leaving school. The introduction of these specific supports has been an important element of NDIS funding working to help increase economic participation. This specifically targeted strategy has worked to improve access to scarce funded supports in this area in the past. The NDIA and Department of Social Services have worked together and have formed participant employment taskforce to recommend measures to improve employment outcomes for NDIS participants. It is important that NDIS Participant Employment strategies are also connected and data and outcomes from this work within the scope of the NDIS needs to be considered going forward to gather work skills data to identify gaps and opportunities to be able to develop targeted strategies.

**Recommendation 6.** That the National Disability Employment Strategy develop relevant transition pathways and approaches to enhancing employment for young people and all people with disabilities including the subgroups above.

## Improving systems and services for jobseekers and employers

Reviewing the design of the Government Disability Employment programs is supported.

A review should seek to align and link disability employment programs more closely to mainstream employment programs so that people with disability have access to the full range of available jobs and employment opportunities.

Making the Government's Disability Employment Program more person centred and more focussed on individual needs is supported. This will require targeted and strategic approaches which currently are not in place. QDN members have identified that it is important that as people with disability accessing these programs, it is important that individual can choose their provider and to change their provider if unsatisfied. It is important that DES funding can operate like NDIS funding acknowledging it is a different mechanism. In order for people to have genuine choice some universal access requirements need to be met to ensure accessibility for people with disability including physical, intellectual, cognitive, neurological and sensory disability. For example, Auslan interpreter availability at all DES providers to allow deaf and hard of hearing people the same choice as other participants. Transparent information on outcomes is critical for participants to make informed decisions when choosing a DES provider.

QDN members have raised that it is important that job plans are treated as living documents which extend beyond the mutual obligation requirements and that they can change over time in sync with participant needs.

The principle of choice and control underpinning participant controlled funding under the NDIS should also apply in the employment sector. This process needs to be resourced to enable participants to exercise their choice and control.

QDN sees that 'Information, Linkages and Capacity Building (ILC)' is a critical piece of the policy and funding mechanisms in place to assist in improving systems and services for jobseekers and employers. ILC was established to recognise that not all people with disability would access the NDIS and that a range of investment was needed to build the knowledge, skills and capacity of people with disability, whilst investing in projects and initiatives that build the capacity of community and mainstream services. This ILC investment recognises that all Australians with disability have a fundamental right to access mainstream and community services and that there is a long standing need to improve inclusion and access of these services to deliver better outcomes for people with disability. To date, ILC investment has had a key focus on economic and community participation and there has been significant investment in a range of projects and initiatives around improving employment outcomes for people with disability. Moving into the future, QDN sees that there is an important opportunity to ensure strategic and targeted investment of ILC funding to match and respond to what is needed in each jurisdiction and nationally with regards to employment and economic participation of people with disability. There has been significant work and innovative projects happening across Australia under ILC and this is a further opportunity to put systems in place to share these learnings and to share outcomes and resources.

QDN supports action and strategies which deliver employment outcomes and long term sustainable employment for people with disability. Within the DES framework, it is important that services delivered are able to meet the diverse needs of people with disability and to achieve quality outcomes. The review needs to bring about cultural change as well as process and practical change. The concept of choice for participants must be paramount.

**Recommendation 7:** The National Disability Employment Strategy development and review Government Disability Employment programs through engagement and co-design with people with disability.

## Changing community attitudes about people with disability and the workplace

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*To be part of the society people with disability want to be included and the only way we can be is when we can be gainfully employed and contributing to the economy. Employment will also assist with more positive view towards people with a disability. (QDN member response May 2021)*

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Changing community attitudes to people with disability is central to improving opportunities. QDN members reinforced this message in consultations stressing the importance of shifting community perceptions about the potential of people with disability, their contribution to the community rather a focus the disability.

QDN members identified that the principles of the UN Convention on the Rights of People with Disability (CRPD) are key to delivering a more inclusive Australia. The principle of “nothing about us without us” urges Government to enter into co- design partnerships.

QDN supports the principles outlined in addition to Article 3 of the UN CRPD and the need for meaningful engagement with people with disability in planning, design, delivery and evaluation of services and supports and outcomes of Government services including employment.

Negative attitudes towards disability continue when people with disability obtain a job and enter workplaces. QDN members report an ongoing attitude that employing people with disability is a form of “charity” or that people with disability should “just be grateful they have a job” and these community attitudes can influence people with disability’s experience of getting and keeping a job.

A public communications campaign is supported. This campaign should include people with disability, the States and Local Government who prepare disability plans.

**Recommendation 8:** Bring together representatives of all 3 levels of Government, communications experts and people with disabilities to codesign the campaign. This should be done from the beginning of the development stage.

Working with mainstream media to encourage them to produce content by people with disabilities or showcasing ordinary people with disability is supported.

## Conclusion

People with disabilities in Australia do not enjoy the same participation rates in the employment market as non-disabled people. However, the right to work is enshrined in the UN CPRD. A National Disability Employment Strategy needs to be built on the central tenant of the “Right to Work”.

QDN members continue to identify the issues that they experience that are underpinned by community attitudes about disability, people’s lack awareness of their rights, high unemployment in the economy 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 National Disability Employment Strategy which is co-designed, comprehensive, needs based and evidence based, and underpinning the National Disability Strategy will be welcome. This approach cannot be about tinkering at the edges but rather a concerted and comprehensive effort to transform the employment market for people with disability.

QDN would welcome opportunity to further contribute to the Strategy and work with the Department of Social Services in co-design approach to further develop the Strategy.