



A new employment model focused on business and jobseekers

Submission to the Department of Social Services Employment Framework Issues Paper

Australian Federation of Disability Organisations, July 2015

Contents

About the Australian Federation of Disability Organisations	4
Introduction	4
Background	6
The five most critical components of a new employment model	7
1. Set up a market driven approach based on the NDIS, with a funding package allocated to people with disability to purchase employment related supports	7
2. Support and incentivise businesses of all sizes to become disability confident	7
3. Adopt macro approaches to address the employment of people with disability	9
4. Develop clear benchmarks, goals, resources and accountabilities to close the employment gap experienced by people with disability and plans for, resources and provide support to people with disability at all stages of the employment journey	10
5. Systemically address the concerns of businesses which relate to Workplace Health and Safety (including insurances), industrial relations and disability discrimination	11
Additional recommendations in response to the Issues Paper	11
What can improve employment outcomes for people with disability?	11
Addressing the employment of people with disability should not be separate to broader efforts to address skill shortages, prepare for the changing landscape of work and efforts to increase Australia's productivity and GDP	11
Increase our understanding of the extent of employment disadvantage experienced by different groups of people with disability and develop a 'clearinghouse' of employment related pilots, programs and learnings which span disability and other groups experiencing disadvantage	12
What can help reduce barriers for people with disability seeking employment?	13
Move away from the standard categorising of people with disability – provide flexibility so that each person with disability can access the supports that they need	13
Remove Disability Support Pension fear	14
Recognition that participating in employment can cost more as compared to employees without disability – the costs of making work 'work'/viable	14
- Extend eligibility to health concessions	15
- Extend eligibility to transport concessions	15
What can help reduce barriers for employers hiring people with disability?	16
Make it as easy as possible for employers to say yes - remove unintended barriers by government, with recognition that different business types have different needs	16
Practical support to business to build disability confidence	16
Address concerns regarding disclosure	17
How can we promote the benefits of employing people with disability?	18
Re-shift how we sell the employment of people with disability	18

Confidence breeds confidence – the role of business peer mentors, employer led stories and increased visibility of people with disability in the workforce	18
Underlying set of principles for change	20
Current Services Review	20
We need to invest in genuine capacity building if we genuinely want to improve employment participation, starting with people with disability requiring the most support	21
Adopt a broader holistic approach to support people with disability to secure sustainable employment which considers services outside of the disability support sector	21
Disability Employment Services and Job Services	22
Disability Employment Services and the Job Services system are not sufficiently meeting the needs of people with disability seeking work and employers seeking talent	22
Re-orient the employment services system to be an enabler rather than driver of the employment system	23
High performing employment support programs should be available as a source of intensive, ongoing support to those who require it, rather than the mechanism that all people with disability are expected to use	24
Move away from artificial employment benchmarks which set the number of hours people with disability can work	24
Does DES need to be redesigned to operate in an NDIS environment?	25
Putting choice and control in the hands of jobseekers to access employment supports	25
Can we improve support for people moving out of ADEs into open employment?	25
Increase the numbers of people who can transition from ADEs into open employment each year, with an end date for full transition and an overall number reduction of people in ADEs	26
Supports for Employers:	26
Expand the Employment Assistance Fund	26
Wide promotion of the Employment Assistance Fund to employers, employment services and people with disability	27
Are the support needs of large employers different to the support needs of small employers? How can we encourage more engagement between employers and people with disability?	27
In what way do you think the NDIS can support employment outcomes for people with disability?	27
What do you think we can learn from the NDIS to improve job services for people with disability?	28
What more can be done to assist people with mental illness to find a job?	28
Life Course and Diversity: Are there particular milestones which have a positive impact on employment prospects for people with disability?	28
Develop, in conjunction with the representative voices of people with disability, a school to post school transition strategy for young people with disability	28
Conclusion	29

About the Australian Federation of Disability Organisations

The Australian Federation of Disability Organisations (AFDO) is the national voice representing people with disability in Australia, comprising a membership base of national and state organisations run by and for people with disability and their families.

Our mission is to champion the rights of people with disability in Australia and help them participate fully in Australian life.

A key focus of AFDO's work is to change the way people with disability are perceived and treated within our society. We believe that Australians with disability and their families should participate fully in all areas of society which includes genuine participation in community life, social and economic participation (including genuine work for real wages) and the opportunity to contribute as a valued citizen.

Since its inception in 2003, AFDO has been a leading voice in the disability consumer sector and has been successful in the development of campaigns, including as a founding member of the National Disability and Carer Alliance. This involvement led to the formation of the very successful Every Australian Counts campaign and bi-partisan support for the legislation and introduction of the National Disability Insurance Scheme (NDIS). AFDO also holds Australia's sole vote for Disabled Peoples' International.

Introduction

The story of unemployment and under-employment of people with disability is not new – in fact, it is a story which has remained unchanged, with a thirty point gap between the employment participation of people with disability and those without disability remaining the narrative over the last decade.

The downturn in Australia's economy in recent years has presented increasing challenges for people with disability. The changing nature of work – a move from singular focused jobs (such as production line work) to jobs requiring a number of skillsets and increases in technological knowledge – has also made it difficult for people with disability with limited work exposure to 'compete' for work, particularly with people with previous work credentials who are 'proven' to be capable employees and come without the perceived added baggage of a disability.

For people with disability, there a multitude of barriers that impact employment. These barriers range from low expectations by those around people with disability and people with disability themselves; the accessibility and quality of our education; the ease to which the right support can be accessed at the right time for both people with disability and people supporting people with disability; and the interface and support of other systems. This interface includes access to health and welfare systems; access to modifications and supports; the ability to get from A to B and the ability to live an ordinary life before employment is even an option.

In relation to employment, barriers often include:

- Misinformed attitudes towards disability (ie. people with disability are costly to employ and are less productive than people without disability)
- Employers' lack of understanding and confidence to talk about disability and its impact on those who currently work, and who might work, in their organisations
- Employers' concern about potential risks, including superannuation implications and Workcover costs and exclusions
- Inaccessible workplaces
- An increase focus on low-skilled, short term jobs and programs (driven by government compliance requirements) in favour of building viable careers
- Lack of visibility, with people with disability not well-represented in public roles, making it difficult to recognise their potential
- Lack of career development opportunities, including limited professional development and skills training, being passed over for promotion and higher duties, lack of job rotation etc.

Despite considerable effort, resources and commitment of the Commonwealth to do something, genuine employment outcomes for people with disability remain low. Addressing the gap between the employment of people with disability and those without a disability is complex, multi-layered and multi-faceted, with the effectiveness of employment support only one small component of a much larger problem.

A new model needs to be about much more than reforming Disability Employment Services (DES) and incentivising businesses. Addressing the unemployment and under-employment of people with disability requires a genuinely holistic appraisal of all of the elements that lead to and contribute to employment.

A new model needs an overlay where systems, such as education, income support, health, employment and other portfolio areas are genuinely inter-related and connected so that attempts to improve the participation of people with disability in one part of life support the efforts of other portfolios. A well resourced, quality accessible education system which recognises and builds the capacity of each student can set in motion the expectation for employment commensurate with a person's capacity and interests – a system that would not only support children with disability to break a future cycle of unemployment and under-employment but also break the cycle for other marginalised groups. Addressing the function of the DES system alone, while needed, is unlikely to make any substantial dent to the employment rates of people with disability.

The end game is not people with disability reporting higher 'employment participation' ie. an increase in the number of jobseekers looking for work, but rather a tangible, measurable increase in the number of people with disability in jobs.

The following submission takes into consideration the complexity of the disability employment space and presents considered responses to a multi-faceted, complex issue. We believe that good ideas already exist – both in and outside of the disability sector. The key is to bring these ideas together as a part of a new model centred on the needs of business and jobseekers with disability.

Background

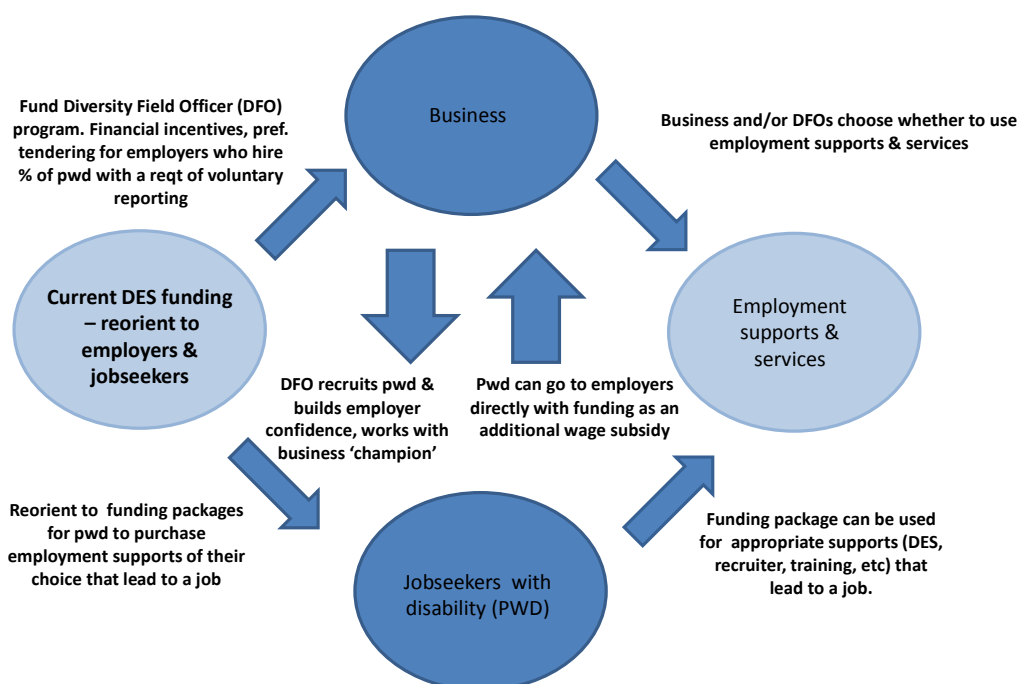
In April 2014, AFDO hosted a roundtable to investigate the parameters of a contemporary, holistic and effective employment model for Australia. The objectives of the Roundtable were:

- To bring together the expertise and perspectives of key thinkers to design a new way of thinking about employment and workforce participation
- To explore a new approach to employment and workforce participation, with the aim of developing a new employment model with jobseekers and employers at its heart
- To share and explore evidence based approaches, which have the potential to be scalable, and examples of innovative models and pilot programs which are producing high outcomes (job placement, sustainability, hours of work, wages, satisfaction of employers and jobseekers or a mix of these) which can inform a new employment model. This includes models outside of disability employment which are producing effective outcomes for other jobseeker cohorts.

Problem solvers and strategic thinkers, from both inside and outside of the employment space, were invited to look at the issue objectively and identify innovative solutions, new ideas and approaches to shape the development of a new model which meets the needs of both business and people with disability. Invitees included a mix of innovators, CEOs and business, people with disability, academics and thinkers in the current disability and employment space to project a model that is flexible and innovative. The Roundtable was attended by 45 strategic thinkers who informed the tangible parameters of a new model.

The following section outlines the five key components to a proposed new employment model which is employer and jobseeker centred informed from this work. Figure 1 also outlines elements of the proposed model.

Figure 1: AFDO's proposed new employment model



The five most critical components of a new employment model

1. Set up a market driven approach based on the NDIS, with a funding package allocated to people with disability to purchase employment related supports

Through consultation with a range of stakeholders, AFDO proposes a market driven approach modelled on the principles of the National Disability Insurance Scheme (NDIS), with a design that enables people with disability to choose supports that will best assist them to reach employment goals (which would include a much broader range of employment supports including mainstream services and training options).

Key elements of the proposal include:

- **Funding partly diverted from the employment service system directly to candidates, which would also be available to individuals with disability who may not be currently eligible for employment services support**
- **Value of the funding package is individualised to take into account each person's circumstances and individual barriers to employment.** Package could be focused on individual capacity building such as development of 'foundational' skills to increase preparedness to enter the workforce (which has been identified as a significant issue in recruiting employees), assistance to find a job, training and development, peer mentoring, ongoing support in a job where required and career development assistance etc.
- **Candidates can choose to direct their funding to**
 - a wider range of supports and services that can help to build employment capacity
 - employment based services (DES/JSA/RTO/mainstream recruiter etc) to assist with finding a job
 - training, education and programs which can address skill gaps, rather than training for training sake
 - a candidate may go directly to an employer and offer their package as a financial wage subsidy as a top up to support provided by the Employment Assistance Fund
 - access supports to start their own business
- **Independent, impartial information will need to be built in to offer support to candidates to explore the wide range of options available,** with specialist advice available to assist people with disability to decide how to 'spend' their funding package to meet their own employment objectives and to build employability skills for a changing workforce.

2. Support and incentivise businesses of all sizes to become disability confident

AFDO believe this requires a top down (champion and buy-in from senior leadership) and bottom up approach (practical support and resources to hire people with disability and create an inclusive workplace culture) that is flexible and responsive to various business sizes.

At a macro level, AFDO recommends that incentives are implemented by government as 'sweeteners' to businesses who increase the employment of candidates with disability (based on meeting agreed KPI measures).

These include

- **Preferential tendering for government contracts and procurement**, with organisations hiring people with disability given preferential weighting in selection processes.
- **Preferential access to government funding (grants, programs etc)**, which could be particularly useful in increasing the employment of people with disability within the community and NFP sector
- **The Australian Government to work collaboratively with state and territory governments to examine the effectiveness of tax incentives to drive long term change** (eg. payroll tax exemptions could be modelled on existing state based models or on international models which could have replicability in Australia). This should include an investigation of the success of existing Government subsidies in increasing the employment of mature age workers (such as the ReStart program) and Aboriginal and Torres Strait Islander people. AFDO also recommends research into the structure and effectiveness of international tax incentives that encourage employment of people with disability and their applicability/replicability in Australia).
- Participating organisations who access the above should be required to report on the percentage of their workforce with a disability initially as part of a **voluntary ‘national scorecard’**, with a staged strategy for mandatory reporting by all businesses operating in Australia by 2025.

At a micro level, AFDO recommends that funding should be part diverted from the current service provision model to provide **practical one to one support to businesses of all sizes, in the form of a ‘Diversity Field Officer’ program to build disability confidence.**

AFDO proposes that in large organisations:

- Initial funding by the Australian Government is provided for a time limited period (max. 24 months) to increase employment of people with disability within the business
- Priorities of DFO is to understand each employer’s needs (what the business does and its operational plan) and to provide practical assistance to hire people with disability who complement and support business objectives
- **Works closely with a business ‘champion’** (ie. CEO or senior executive) who can help influence workplace culture and drive implementation over the longer term. The business champion will be required to report against organisational KPIs related to the employment of people with disability
- Works with and trains leadership and management to increase ‘disability confidence’
- Works with recruitment/HR staff/Diversity Units to source, select, recruit and retain candidates with disability

Many of the same elements would apply for small business and small to medium enterprises, with the following amendments:

- Time limited, part-time under contract for smaller businesses, with a DFO working with a number of businesses concurrently
- In smaller companies, the DFO would work alongside staff responsible for recruitment
- Focused on supporting businesses to create a solid job match and identify ongoing employment support pathways to enable businesses to continue to employ people with disability post placement.

The Diversity Field Officer is focused on a 'demand driven' approach to employment. Elements include:

- Works with the business to identify positions that are available/can be created and ways to increase flexibility, which could include redesign of work practices/positions which consider the output of the team, unit and business, rather than individual output
- Customised training and ongoing support as required – for managers, team and employee with disability
- Assists each business to make reasonable adjustments, address WH&S and identify strategies to improve whole of business accessibility, ie. recruitment, physical access etc
- Liaises with service providers (Disability Employment Services, Registered Training Organisations, mainstream recruiters and organisations that support people with disability) as required to get the “best fit” for the business and support candidates, including creating connections and pathways to support businesses to continue good practice post placement
- Works to identify work experience opportunities and internships and helps to build career development pathways for existing and new employees with disability
- Assists businesses to access incentives (listed above)

Information about the current AFDO Diversity Field Officer trial is provided later in this submission.

3. Adopt macro approaches to address the employment of people with disability

AFDO believes that all employment sectors should be scrutinised regarding their employment practices - we cannot expect business to perform well when government and the not for profit sector are performing relatively poorly. Macro approaches include:

- **All levels of government to lead in the employment of people with disability**, with governments to improve public sector employment rates of people with disability as part of a comprehensive national strategy as leading Australian employers
- The **introduction of target employment figures and an internal accountability mechanism for failure to meet those targets**. As a starting point, this should include a commitment to the introduction of an incremental, statistically verifiable increase of the number of people with disability (as a percentage) that the Australian Public Services and State and Territory governments employ per annum, which is measurable and has mechanisms for

accountability. It is imperative that this is not be viewed as a 'diversity issue' handled as a silo approach within departments and industry but as an issue with holistic government buy in from the very top.

- **Trial of best practice approaches** and development of different models for inclusion of people with disability at all levels and all departments of the APS from intake to leadership, including creating apprenticeship, traineeship and work experience opportunities for people with disability
- **Resource a national 'What's normal' advertising campaign** which asks Australians to question what is considered 'normal' in Australian workplaces and showcases the employment of people with disability as a normal part of doing business.

4. Develop clear benchmarks, goals, resources and accountabilities to close the employment gap experienced by people with disability and plans for, resources and provide support to people with disability at all stages of the employment journey

To bridge the gap that exists between employment of people with disability and those without disability, a case exists to establish clear, agreed and accountable goals between all levels of government, industry and people with disability.

A critical goal is how we achieve a measurable improvement in the number of people in work over a set period of time - a bridging of the current unemployment gap with a focus on the number of people who move from looking for a job to getting one. Metrics which outline the number of people with disability that would need to enter the paid workforce to close the unemployment gap and how this could be effectively measured are critical.

Attention should also be given to

- a unified, overarching policy framework which spans early childhood to further education and training that is inclusive of people with disability;
- work experience in school to provide an insight, as well as practical experience of, and exposure to, the world of work;
- effective transition pathways from school to post-school training and employment;
- peer support, job mentoring and workplace support as required
- job readiness skilling and practical experience to enable people with disability to build personal confidence and demonstrate competency to employers;
- how we build ongoing development, career advancement and leadership opportunities to increase people with disability in more senior positions

Again, appropriate resourcing, mechanisms to monitor progress, clear accountability and accountability for non performance must be built in.

5. Systemically address the concerns of businesses which relate to Workplace Health and Safety (including insurances), industrial relations and disability discrimination

The perceived additional costs and risks of hiring people with disability continue to be concerns of businesses. Drawing on the 2005 Workability II report¹, AFDO recommends

- a government-sponsored trial program that simultaneously covers insurance premiums (and in AFDO's view disability discrimination insurances) and ensures the collection, analysis and dissemination of reliable data about the true impact of those laws on employers
- engagement of State workers compensation authorities in disseminating information and developing disability employment strategies; and
- multi-faceted awareness raising campaign which includes business-to-business promotion.

Additional recommendations in response to the Issues Paper

The Issue Paper has proposed a series of questions, some of which have been addressed in the previous section. Additional recommendations in response to the questions have been provided below, which complement and support a new model.

What can improve employment outcomes for people with disability?

Addressing the employment of people with disability should not be separate to broader efforts to address skill shortages, prepare for the changing landscape of work and efforts to increase Australia's productivity and GDP

With the elevation of disability in the public conscience with the legislation of the NDIS and its focus on supporting people with disability to economically participate, as well as an ageing population who will be required to work longer and will likely acquire a disability, the employment of people with disability is a critical part of future economic planning.

Efforts to increase the number of people with disability in the workforce should not be considered in a vacuum. A recent report by the Committee for Economic Development Australia² highlights areas where significant investment is required to prepare for the jobs of the future.

In order for people with disability not to fall further behind, investment will be critical to overcome systemic disadvantage and identify and build opportunities for people with disability to participate in a more sophisticated and technology-driven labour market. The development of holistic workforce strategies to meet future demand need to be inclusive of people with disability with a wide range of skills and talents as contributors to the future workforce.

¹ Human Rights and Equal Opportunity Commission, 2005, *WORKability II: Solutions – People with Disability in the Open Workplace*, accessed via https://www.humanrights.gov.au/sites/default/files/Workability%20II%20-%20Solutions%202005_0.pdf

² Committee for Economic Development of Australia, 2015, *Australia's Future Workforce?*, CEDA access via http://adminpanel.ceda.com.au/FOLDERS/Service/Files/Documents/26792~Futureworkforce_June2015.pdf

Increase our understanding of the extent of employment disadvantage experienced by different groups of people with disability and develop a ‘clearinghouse’ of employment related pilots, programs and learnings which span disability and other groups experiencing disadvantage

While people with disability have one of the highest rates of unemployment and under-employment in Australia, we are among a number of cohorts to experience significant employment market disadvantage (such as Aboriginal and Torres Strait Islander people, young people, mature age, CALD, GLBTIQ and previous offenders to name just a few).

While work undertaken by national people with disability and family organisations have provided valuable insights of what works and what has failed certain groups³, the lack of appropriate resourcing has meant that there are significant gaps in knowledge. The full extent of the employment disadvantage experienced by different groups of people with disability and what works best for certain groups is largely unknown.

Implementing solutions before we have a solid understanding of the specific issues experienced by different groups of people with disability and what is likely to lead to good outcomes for each group is the equivalent of trying to address poverty by handing over a blank cheque. Without evidence of best practice and a solid understanding of the range of barriers experienced by particular groups of people with disability, there is a risk that solutions will be implemented that will continue to perpetuate employment disadvantage, or leave groups of people with disability behind.

In order to close the gap, we firstly need an objective research and evidence base which looks at inter-sectional disadvantage. This includes data by gender, age, ethnicity, geography, type of disability, whether the disability is congenital or acquired (which is particularly important in understanding the extent of workforce disadvantage and how prior work history impacts employment transition or re-entering the workforce) and other characteristics. The current data is inadequate in understanding and addressing multiple disadvantage where living with a disability is just one of the factors which may impact employment.

Secondly, we need to understand what interventions and best practice (domestic and international) work best for different disability cohorts as well as what can be learned from other groups.

Through our detailed work on employment over the last three years, AFDO have become aware of a number of employment related projects being undertaken by organisations, some of which are providing promising results. Awareness of these projects however are adhoc, with no centralised mechanism to capture the good work that is occurring to assist people with disability and other cohorts, such as indigenous and youth, into work. There is also no mechanism to determine how these might be applied to people with disability. This is consistent with feedback from industry groups who we have spoken with who have noted that there is lack of ownership and coordination

³ Australian Federation of Disability Organisations, 2013, *Consumers front and centre: What consumers really think about Disability Employment Services*, AFDO, Melbourne.

that can assist employers to streamline the employment of people with disability and other groups experiencing barriers to employment.

A clearinghouse, with a function of bringing together knowledge of pilots, programs and 'pockets' of excellence is vital to increase our understanding of what is working and why, collecting examples of best practice and taking into account learnings by cohort, geography and other characteristics such as gender, age and ethnicity. A clearinghouse would also play a useful role in identifying consistent elements between pilots and programs which could not only apply to people with disability but also other groups experiencing disadvantage (and vice versa) and to understand how international models (such as employment programs in Denmark to retrain and build employability of mature age workers⁴) may have applicability in Australia.

Determining what constitutes good practice, and in fact, best practice (high employment outcomes rates not just high employment 'participation') should consider:

- the success with particular groups (who does the model work well with?)
- the model of practice
- the outcome rates of placement and retention
- the average and range of weekly hours of work and weekly wages
- the characteristics of participants and
- support costs per outcome

Customised solutions that have been shown to work with particular cohorts, such as the success of intensive preparation, job matching and ongoing support for people with intellectual disability and employers, are critical to moving the needle of employment attainment. Best practice for a young adult with an acquired brain injury is likely to be quite different to the supports needed by a mature age worker with vision impairment re-entering the workforce.

Commitment to implement solutions that are outside of the box requires commitment to explore solutions that will work for different cohorts as well as the preparedness to learn from other cohorts. Objective evidence is critical to set clear and measureable improvement targets.

What can help reduce barriers for people with disability seeking employment?

Move away from the standard categorising of people with disability – provide flexibility so that each person with disability can access the supports that they need

It is clear that the standard categorising of people with disability has not worked - saying that all people with a physical disability want and need the same support does not account for individual skills, talents, career hopes and living contexts. Approaches must be tailored to individuals taking into account the diversity of disability. For some people all that may be required for positive change is an education and/or marketing program aimed at the removal of negative attitudes, while for others, jobs may need to be modified in some way.

⁴ Committee for Economic Development, 2015

Workplaces and employment opportunities that are flexible and able to be customised to people's particular situations may be more suitable for some people with disability. As currently exists in the workforce, there should be a variety of job opportunities for people with a variety of job aspirations. Not all people with disability aspire to or are have the skills for senior executive roles nor do they want to work in entry level jobs.

Flexibility to meet people with disability 'where they are at' is critical in a new model. A move to individualised funding as outlined helps to achieve this objective.

Remove Disability Support Pension fear

The thought of losing the Disability Support Pension (DSP) can produce anxiety and fear particularly among people with disability who have been churned through an income support and/or employment service system which has not met their needs and failed to lead to work.

It is imperative that mechanisms are identified to encourage people with disability who are receiving income support to consider and apply for jobs without losing the security that income support provides until their employment situation is secure and stable.

AFDO recommends a policy that encourages DSP recipients to work for as many hours as possible without triggering pension suspension or cancellation. The policy should enable people in receipt of the DSP who choose to work to continue to receive a part pension until paid income reduces the pension to zero dollars when applying the income/assets test. This approach

- removes limitations on hours of work
- encourages DSP recipients to earn as much as possible and increase their hours of work
- addresses the anxiety of the number of hours that can be worked before income support and associated entitlements are affected
- decreases reliance on the DSP as much as possible via the DSP income test

This measure could also have a positive impact on the number of DSP recipients who currently report earned income which sits at around 10%.

Recognition that participating in employment can cost more as compared to employees without disability – the costs of making work 'work'/viable

For a significant proportion of people with disability, the costs of joining the workforce can outweigh the economic benefits of employment, with people with disability often experiencing additional costs to participate above those born by people without disability.

These include the cost of accessible transport to and from the workplace (particularly where public transport is not accessible for the entire journey), meeting the costs of adjustments not covered by the Employment Assistance Fund (such as Auslan required above the funding allocation); and out of hours personal support for people with disability to get ready for a day's work. For people with disability earning over the income support threshold, the costs of medications and meeting medical/disability related needs without the assistance of health concessions can be significant. The extent of income that can be earned before State and

Territory government supports cut out (such as taxi subsidies) also can impact whether paid employment is viable.

While the NDIS will assist with some of the above costs for some participants, the scheme proposes to support 460,000 Australians with disability. When considering that 833,000 Australians receive the Disability Support Pension and over one million Australians with disability are currently employed, it is clear that the NDIS will not be able to alleviate the additional costs of work born by most people with disability. It is therefore critical that reforms are considered which can assist the broadest base of people with disability who will unlikely be supported by an NDIS. AFDO believes that there are a number of relatively minor reforms which can alleviate these issues which have broader support⁵.

- **Extend eligibility to health concessions**

AFDO recommends extending eligibility for health care concessions for people with disability who enter the workforce.

AFDO recommends that this measure is not income tested. If however a threshold is considered by the Australian Government, AFDO recommends that careful modelling is undertaken to develop a fair and reasonable threshold which takes into account the average Australian wage and additional costs born by particular cohorts of people with disability.

- **Extend eligibility to transport concessions**

Investigation should be undertaken to understand

- a) the costs of transport for people with different disabilities
- b) the additional costs that may be incurred because of participation in the open workforce
- c) the impact of these costs on participation in the open workforce

The extension of the Mobility Allowance should be considered for people with disability who can demonstrate significant costs of travel to and from the workplace which exceed the costs of average workers without a disability and/or where public and private transport is not accessible. Where this is demonstrated, Mobility Allowance should be made available to reimburse the additional costs born by people with disability and be income test free. If a threshold is considered by the Australian Government, AFDO recommends that careful modelling is undertaken to develop a fair and reasonable threshold which takes into account average Australian wages and additional costs born by particular cohorts of people with disability.

⁵ Human Rights and Equal Opportunity Commission, 2005

What can help reduce barriers for employers hiring people with disability?

Make it as easy as possible for employers to say yes - remove unintended barriers by government, with recognition that different business types have different needs

From an employer perspective, successful and sustainable employment of people with disability has been made difficult by processes which create unintended barriers and 'red-tape' for employers. The banking and retail sectors in discussions with AFDO have noted that

- Government programs are not designed with the needs of businesses in mind and were described as 'haphazard' and time limited, inhibiting the ability to take a longer term approach and to develop scalable programs. Government grants are also often tied to a political announcement, which compromises the longevity of a project
- Different sized organisations have different challenges, with industry noting challenges in implementing strategies at a local, regional and national level
- Industry groups note that there does not appear to be any ownership/coordination which can assist employers to streamline the employment of people with disability. AFDO proposes that this could be addressed through the development of a clearinghouse (previously outlined) which can also play a co-ordination role.

While the focus on public sector and private sector employment is important, it is critical that there is also investment in the community sector and small business which has had relatively less investment and attention.

Practical support to business to build disability confidence

Both domestic and international literature highlights the value of direct support available to business to take the first step. Research undertaken on behalf of the National Center for Vocational Education Research⁶ in 2015 has indicated that

- even when employers are open to the idea of employing a person with a disability, they are often not confident that they have the knowledge, understanding and capability to employ
- the role of trusted brokers and mediators are critical, with small-to-medium-sized enterprises expressing frustration at their difficulties in accessing information relevant to their businesses
- employers are not looking for formal training in 'disability employment', rather assistance in building their capacity to support the productive employment of people with disability
- the vocational education and training (VET) system already helps employers to employ people with disability (by providing group training organisation field officers), with NCVET suggesting that a broader role could be developed which requires financial support.

⁶ Waterhouse P, Kimberley H, Jonas P, & Glover, J, (2015), *What would it take? Employer perspectives on employing people with a disability*, National Centre for Vocational Education Research (NCVER).

The Diversity Field Officer concept is a micro concept as part of AFDO's proposed employment model. This is currently being trialled with Deakin University and aims to test an employment engagement strategy for small to medium businesses to increase confidence to employ people with disability.

The pilot, in Geelong, Victoria, will involve Diversity Field Officers who will work directly with small to medium businesses (from very small businesses to businesses with less than 100 employees) who are interested in developing employment opportunities for people with disability. The Diversity Field Officers will work with businesses to

- Develop understanding of business needs and how employment of a person with a disability can add value
- Build awareness of businesses of how to accommodate disability in the workplace and the supports that are available
- Provide specialist advice and one to one tailored support, including review of policies and procedures, to remove and minimise barriers which impact the recruitment and ongoing employment of people with disability
- Facilitate connections with a wide range of employment supports and resources to support businesses to become disability confident, and continue that confidence post the pilot

Geelong, Victoria has been specifically chosen as the pilot site due to the changing workforce demography of the region and as the Victorian trial site for the NDIS which is principally focused on increasing social and economic participation.

To recruit local businesses, a series of business events will be held with the support of Geelong partners including Geelong Chamber of Commerce, G21 Geelong Region Alliance and Committee for Geelong. The project is supported by Helen Macpherson Smith Trust, Worksafe Victoria and the National Disability Insurance Agency.

Intensive one to one support will be provided to up to 50 businesses. The project will include a full evaluation that will enable proof of concept and provide an evidence base for the scaling up of the model. A literature review and international scoping exercise has been undertaken to inform the design of the model.

The findings of this pilot will provide some practical insights into the willingness of small businesses to engage with free practical support amidst other competing business priorities; the types of supports most valued; the intensity of the support required; and whether disability confidence to hire people with disability as skilled employees increases after a short period of one to one tailored support.

Address concerns regarding disclosure

Disclosure remains a problematic issue for employers and for jobseekers with disability, with research by NCVER (2015)⁷ highlighting that lack of disclosure is a key concern of employers (especially in relation to mental illness) which can be mitigated if there is trust between the

⁷ Waterhouse et.al, 2015

employer and employee. This is consistent with feedback to AFDO and our organisations from people with disability, who report feeling more comfortable in disclosing their disability when disclosure does not threaten potential or current employment.

Under the Disability Discrimination Act 1992 (Cth), there is no legal obligation for an individual to disclose information about their disability unless it is likely to affect the person's work performance or their ability to work safely. AFDO upholds that the disclosure of disability is a personal choice and that individuals will use their own discretion about when, how or whether to disclose. AFDO also upholds that disclosure should occur where it relates to the ability to perform the inherent requirements of the job at hand and when reasonable adjustments may be required.

Advice to employers about how to create a workplace culture that encourages disclosure is important. We believe this area requires further attention. For very small to small businesses, practical support to build confidence around hiring people with disability and how to encourage and support disclosure is critical.

How can we promote the benefits of employing people with disability?

Re-shift how we sell the employment of people with disability

Disability is simply another life event, like raising children and caring for others, that needs to be accounted for in the workplace and the broader community. While over 833,000 people receive the Disability Support Pension, there are over one million Australians with disability in paid work. AFDO believe that we need to shift the conversation to

- what people with disability can do and do do
- the reality of employing people with disability – the benefits, the similarities, the differences, the misconceptions and the challenges.

AFDO takes the position that messaging about people with disability and by people with disability needs to be honest and upfront – that not all people with disability are 'inspiring' with higher than average productivity, nor are we figures of charity. People with disability have a range of skills, talent, capabilities, interests and areas of improvement as do people without disability. We may not be the same but we are also not as different to our non disabled peers.

People with disability have much to add to the workforce. The way we communicate this is just as important as the policy levers we implement in a new model.

Confidence breeds confidence – the role of business peer mentors, employer led stories and increased visibility of people with disability in the workforce

Employers who currently hire people with disability are considered to be the "converted", and by their practices, demonstrate their commitment to hiring and retaining people with disability. Rather than continue to seek additional commitment from the same employers – those who are "doing it" – we also need to invest in an engagement process with employers who are interested but unsure of how to begin.

AFDO believe that a top down and bottom up approach is needed to maximise the willingness of businesses to take the first step - embed the support of leaders within organisations who can act as champions, coupled with a manager and line staff on the ground who can drive practices and change.

Professionals working in the diversity space that AFDO have spoken with have noted the difficulty in obtaining “buy-in” from senior levels of management to implement practical measures (rather than just receive philosophical support) to embed gender diversity. Importantly, this highlights that the recruitment of people with disability is not even on the radar of many organisations or is far lower in their list of priorities.

Showcasing the success stories and providing access to practical support from employers who are already engaged and committed are key to getting new employers to take the next step. AFDO believes this requires a number of approaches including:

- Sourcing champions of business and people with disability to dispel preconceived notions
- Work collaboratively with employer peaks to encourage business leaders across Australia to take shared ownership of the employment of people with disability and drive change within their own organisations as well as promote the benefits of a diverse workforce more widely
- Work collaboratively with employer peaks to identify and resource opportunities for peer to peer business learning and sharing of information, resources and measures to support change at an operational level, with the support of business mentors and champions
- Work collaboratively with business and industry to obtain genuine commitments to provide job opportunities and on the job experience, including work experience programs, on the job learning, graduate programs and industry based learning initiatives.

A number of studies have demonstrated that mere information is not enough to shift deeply embedded personal and cultural stereotypes and attitudes, with experiential programs such as work trials, mentoring programs, internships, and actual job placements for people with disability the most powerful methods of changing attitudes. These programs give employers an opportunity to get to know people with disability first-hand and therefore rely less on inaccurate stereotypes.

Having people with disability visible and making a contribution in workplaces across Australia is an important component of changing perceptions about the capacity of people with disability. Giving people with disability a high priority in internships, work experience and voluntary work will assist with changing attitudes by giving people with a disability visibility within the workforce.

Underlying set of principles for change

AFDO supports the underlying set of principles which have been put forward in the Issues Paper which include

- individual funding based on needs and aspirations;
- long term career planning and capacity building;
- understanding of employer needs;
- increased open employment options;
- whole of government co-ordination and use of technology; and
- that the person is supported through the life course

AFDO recommends that 'whole of government' co-ordination also consider a co-ordinated government approach to address systemic disadvantage that impacts the employment of people with disability. At present, education, vocational training, disability employment programs and employment sit in three different portfolios across government, under the responsibility of five Ministers, creating an adhoc approach to building, resourcing and supporting a continuum of employment which ensures that people with disability are supported in their journey to employment. Better linkages and coordination between these currently independent systems is urgently required.

Improved co-ordination between Federal, State and Territory governments programs for people with disability is also critical.

AFDO also recommends the inclusion of a principle which recognises best practice – there are examples across Australia of practice leading to solid employment outcomes for specific groups of people with disability which should rightfully be considered in the development of a new model.

While AFDO endorses a stronger focus on consumer choice and control, principles focused on improving business engagement are less evident in the above list. AFDO recommends that the elements of our proposed employment model are considered as foundation principles to ensure that a new model is both business and jobseeker centred.

Current Services Review

The Issues Paper asks a series of questions regarding current services (DES, JSA and others) and programs such as the Employment Assistance Fund, JobAccess and NDRC. While there are a number of problems relating to pathways and interface between programs, of greater concern to AFDO is how the capacity of jobseekers with disability is being developed and the holistic support available to address barriers in addition to disability which impact on employment. AFDO provides the following recommendations:

We need to invest in genuine capacity building if we genuinely want to improve employment participation, starting with people with disability requiring the most support

Many of our conversations with large employers and their networks have centred on people with disability entering the workforce through graduate programs, direct recruitment from universities, general recruitment processes where people with disability are encouraged to disclose, direct approach of individuals or word of mouth.

While these are important pathways, mechanisms are needed to encourage employers to provide opportunities for people with disability who may need some additional support. Jobseekers that have been unemployed for some time may require a series of steps to re-build job-readiness which could include job shadowing, mentoring, community participation and a system that allows for setbacks.

The Issues Paper references the continuum as the level of support people with disability require and their capacity for work. Improving outcomes for people with disability also needs to consider the experiences that people with disability have had with employment previously (which could include recent significant experience, some experience or no experience at all) and the support that people with disability may need to address other life challenges which may be unrelated to their disability.

Adopt a broader holistic approach to support people with disability to secure sustainable employment which considers services outside of the disability support sector

For a person with disability, getting and keeping a job requires more than the disincentive of losing the DSP and basic assistance with job search functions. People with disability, particularly individuals who have been long term unemployed and have experienced sustained disadvantage require additional support to build confidence and capacity, as well as assistance to address a range of barriers impacting employment.

National people with disability and family organisations have recommended that employment support should be a component of a more holistic framework which can work in tandem with allied services, government, community services and formal and informal networks to address the multiple barriers which impact on a person's capacity to work.

Reform to the employment services framework needs to consider and promote interaction between cross-disciplinary support services who can work together to enable a person with disability to become work ready and work confident, while concurrently addressing other barriers to participation. This includes but is not limited to housing availability, income support, community connections, individual capacity and independence.

Looking at this from an Aboriginal and Torres Strait Islander perspective, First Peoples Disability Network⁸ note that addressing the social and emotional needs are just as important to successful engagement as finding a job. Indigenous jobseekers experience greater labour market

⁸ Australian Federation of Disability Organisations

disadvantage as compared to non-indigenous job seekers. This often includes lower levels of education, poorer health and wellbeing outcomes, higher rates of disability and poor access to employment opportunities due to geographic location. Understanding the importance of societal responsibilities and utilising the strengths of family and community based kinships can also increase the possibility of involvement in disability and mainstream employment services.

For people from CALD communities including refugees and humanitarian entrants, a cross-disciplinary approach will also need to involve better links with settlement services outside of the disability sector that can provide case management services and can help to address cultural and integration barriers.

A holistic approach to employment – one which looks at each person ‘where they are at’ as the starting point – is again the critical element. An individualised funding model, as has been previously outlined, best supports this approach.

Disability Employment Services and Job Services

The Issues Paper proposes a number of questions regarding Disability Employment Services and Job Services. While each system operates differently, there are parallels in what is needed for both people with disability and employers irrespective of the system. These recommendations are outlined below.

Disability Employment Services and the Job Services system are not sufficiently meeting the needs of people with disability seeking work and employers seeking talent

Looking at data released this year, less than one in three people with disability who registered with a DES reached a 26 week outcome. Unpublished research from the former DEEWR indicated that only 3% of employers who know about the DES system use it, highlighting poor engagement and knowledge. For Job Services, just 28% achieved a 26 week outcome.

Success should not be considered as a three month or six month placement when this would not be considered as success for people without disability entering the workforce. Success is facilitating a job match that is sustainable and mutually beneficial to the business and the jobseeker.

In 2013, AFDO prepared the Disability Consumer Engagement Project report⁹, a comprehensive report collating the data collected by twelve organisations run by and for people with disability and their families of the experiences of people with disability using the DES system and how this system could be improved. The report presented many critiques of the current system by both people with disability and employers which included:

- Poor awareness among people with disability of what services DES provide and what a client can ask for

⁹ Australian Federation of Disability Organisations

- Poor understanding by DES of the specific needs of people with disability and their employment barriers, including the particular needs of diagnostic groups (such as mental health, intellectual disability and sensory impairment) and people with dual or multiple barriers to employment
- DES eligibility is limited and is not open to people with disability who identify as requiring employment support, including people with disability seeking to build their career
- Breadth of DES knowledge and networks to assist people with disability with post secondary qualifications into more than low skill/entry jobs, such as graduates, is poor.
- Large caseloads often lead to less time spent with clients and with employers, which leads to poor job matching and loss of confidence by employers
- The heightened focus on accountability and government reporting compromises the amount of time providers can spend to understand the needs of their clients and the needs of employers. This in turn compromises the quality and in some instances, the sustainability of the job match
- Current system is focused on job placement which is financially recognised at 13 and 26 weeks, with no performance requirement to ensure longevity/sustainability of placements. While AFDO has supported a 52 week outcome within the current performance framework, this is not linked to a payment and could be viewed as less attractive.
- There is no quality measure in the performance framework to assess the satisfaction of either the client (person with disability) or employer; the two critical components of a job match. This includes the suitability of the job match in meeting the aspirations and skillset of the client and the expectations or requirements of the business
- Poor knowledge, connection and engagement with employers, with no emphasis or requirements to be employer centred
- The skill-set of people seeking employment through the assistance of a DES may not present a direct fit with the skill-set sought by employers. As noted by an AFDO stakeholder, university graduates with a disability are often appointed to graduate programs through direct recruitment strategies, and very rarely if ever through the assistance of a DES or JSA.

These findings are relatively consistent with the experiences of people with disability using the former JobServices model. AFDO prepared a series of recommendations¹⁰ specific to Disability Employment Services that may be useful to this Inquiry.

Re-orient the employment services system to be an enabler rather than driver of the employment system

As outlined at the start of this submission, AFDO recommends a “shake-up” of the current system with funding diverted to assist people with disability to purchase appropriate supports which will lead to employability and to assist employers to hire people with disability. A market approach should be adopted which encourages competition amongst providers who can tailor their services

¹⁰ Australian Federation of Disability Organisations

to particular market segmentations (employers, people with disability who experience particular barriers, providers focused on career development etc).

AFDO recommends:

- Move from a transaction system (system which monitors the welfare participation requirements of jobseekers) to an outcome system (sustainable job placements which meet the needs of businesses and jobseekers)
- Significant proportion of funding provided to DES post 2018 re-allocated to businesses and candidates
- Current DES model would be re-oriented to offer services which can be purchased by a person using their funding package, which could include training specific to the candidate and potential roles, workplace readiness, access to work experience and other support including ongoing job support for candidates who require it
- Employment service providers can be approached by DFOs to work with and identify candidates or approached directly by employers
- Reorientation of the model enables opportunities for innovative, flexible and specialist support to entice candidates and businesses which could lead to increased quality and choice, including new service offerings tailored to business, career focused providers, or providers specialised in addressing particular employment barriers
- Providers, with the consent of the candidate, strongly encouraged to work holistically with other supports accessed by the candidate (allied health professional, social worker, case manager etc) to address the multiple barriers to employment which can compromise a successful job match

High performing employment support programs should be available as a source of intensive, ongoing support to those who require it, rather than the mechanism that all people with disability are expected to use

Programs demonstrating high employment outcomes for people with disability, particularly for specific disability cohorts experiencing higher levels of employment disadvantage, should have a place within the new model.

Two examples are the JobSupport model which achieves outcomes in excess of 70% for people with intellectual disability and employers and Ticket to Work, supported by National Disability Services, which is achieving genuine post school and open employment outcomes for young adults with intellectual and other disabilities.

Move away from artificial employment benchmarks which set the number of hours people with disability can work

AFDO is concerned that employment benchmarks, which predetermine the hours of work a participant is capable of achieving and which also drive funding levels and provider outcomes, are counter-productive. Rather than providing sustainable employment, they actually force providers into taking the 'easy' option of placing participants in low level, low wage jobs offering

minimum hours of work. This must be addressed in the development of a new employment model.

Does DES need to be redesigned to operate in an NDIS environment?

Our overall thinking and approach about the employment of people with disability needs to be redesigned to operate in a NDIS environment, rather than just our thinking about the operation of Disability Employment Services and Job Services.

Putting choice and control in the hands of jobseekers to access employment supports

As outlined, AFDO recommends that the new model needs to be about genuine choice: the ability for people with disability to be able to select a provider working in their employment region of choice (rather than a arbitrarily prescribed Employment Service Area); a specialist provider who understands their disability; a provider in the industry they are seeking to work in; a provider who can help build specific work related skills; a provider who can provide support to build relationships or networks; multiple providers who can meet different needs or no provider at all, with funds available to build personal capacity or meet specific employment goals.

As has been noted throughout this submission, a one size fits all solution will not resolve the complex problem of employment of people with disability. It is therefore important that a range of solutions are open to people with disability and employers to tap into.

The employment framework review provides the opportunity to comprehensively assess what is working, what is not and where investment would be most beneficial. The following are critical questions which should guide this assessment:

- Which employment service practices provide evidence of the highest levels of employment outcomes for people with disability in terms of jobs, retention, wages, hours of work and at what cost?
- Which employment service practices provide evidence of employment outcomes that decrease poverty and the reliance on income support?
- Which youth transition practices provide real pathways from school to employment participation rather than income support dependency?
- Which service practices lead to successful outcomes for all people with disability, and which of these are successful for particular groupings of people with disability?

Can we improve support for people moving out of ADEs into open employment?

People with disability should have the opportunity to participate in all part of mainstream life as do their non disabled peers – for this to occur we need to move beyond models which promote segregation of people with disability, including segregated models of employment. It is clear from current practice that people with intellectual disability and multiple disabilities not only have the

capacity to but successfully work in open employment at award wages via models which support both the employee and employer.

Supporting people to move out of ADEs into employment requires a two pronged approach:

Increase the numbers of people who can transition from ADEs into open employment each year, with an end date for full transition and an overall number reduction of people in ADEs

If the intent of Australian Disability Enterprises is to support people with disability to participate in employment, then building the capacity of people with disability to enter into open employment and to transition out of ADEs should be the ultimate aim.

According to the Issues Paper, just 0.8% of people with disability employed by an ADE transitioned into open employment in 2014.

In the 2015-16 Budget, \$14 million has been allocated to enable eligible employees of ADEs to have access to a DES provider for up to two years while maintaining their ADE employment. This will enable an additional 300 people per year to find a new job, doubling the numbers who already take up this opportunity under the existing arrangements.

While this measure will assist some people with disability to transition into open employment and is a step forward, this measure will only assist just over 1.5% of current ADE employees. A reasonable timetable for transition must be developed in conjunction with national people with disability and family organisations, with a commitment to an overall number reduction of people in ADEs.

AFDO recommends that the Budget measure outlined is significantly expanded (minimum of a six fold expansion) in the 2016-17 Budget to increase the numbers of people transitioning into genuine alternatives to ADEs, including open employment commensurate with the person's interests and capacity, and/or volunteering and community participation where this aligns with the interests and capacity of the person.

Supports for Employers:

The Issues Paper asks a series of questions regarding the effectiveness of programs including the Employment Assistance Fund. AFDO recommends the following:

Expand the Employment Assistance Fund

While the Employment Assistance Fund (EAF) has provided valuable assistance to thousands of Australians with disability, the workplace support needs of many Australians with disability cannot be met under current EAF rules.

AFDO recommends that the EAF be reformed to allow the provision of an expanded range of supports and assistance that are critical to the participation of people with disability in the workforce including hearing aids, ongoing personal assistance and ongoing Auslan interpreting.

AFDO also recommends that consideration be given to liberalising the rules covering reimbursement of the cost of equipment purchased by an employer and extending the EAF to cover casual employment and ongoing voluntary work.

Wide promotion of the Employment Assistance Fund to employers, employment services and people with disability

As has been indicated in the Issues Paper, knowledge of the EAF by businesses of all sizes is low. Employers for the most part are not aware of these supports – unless a business is actively thinking and looking to hire a person with disability or support a current employee, it is unlikely that information about how to support a person with disability within the workforce will cross their radar.

AFDO recommends that a partnership approach is adopted between the Australian Government, national, state and territory business and industry bodies and people with disability and family organisations to develop strategies to increase grassroots information to employers.

Are the support needs of large employers different to the support needs of small employers? How can we encourage more engagement between employers and people with disability?

As outlined, AFDO is undertaking the Diversity Field Officer project, with a focus on small businesses with less than 100 employees. The findings from this research will provide insights into the take up of practical support by small business, the types of supports that are most valued and whether an increase in disability confidence is reported.

In what way do you think the NDIS can support employment outcomes for people with disability?

The full rollout of the NDIS will alleviate some of the most critical barriers which impact on the participation of people with disability in everyday life, such as addressing daily living needs and providing access to supports which promote independence, capacity and participation.

While the NDIS is focused on increasing social and economic participation, many issues such as housing, health, educational attainment, access to premises, transport and employment are outside of the responsibility of the NDIS, requiring a cross sector approach to address inclusion and disadvantage experienced by people with disability.

Further the NDIS, while available to all Australians, will not fund the non employment needs of all people who have a disability which make up 20% of the Australian population. It is critical that a new employment model considers the interface between employment and other portfolios to maximise investment and outcomes.

What do you think we can learn from the NDIS to improve job services for people with disability?

Placing choice and control in the hands of service users rather than services who work for them is one of the most critical principles. Our recommendations regarding the shifting of decision making to people with disability and employers has been outlined throughout this submission.

What more can be done to assist people with mental illness to find a job?

AFDO recommends that the Department review the comprehensive submission prepared by Mental Health Australia in response to this Inquiry.

Life Course and Diversity:

Are there particular milestones which have a positive impact on employment prospects for people with disability?

AFDO's thinking on critical points within the continuum has been outlined. One of the most important is the transition from school to post school options to address the high levels of youth unemployment of people with disability.

Develop, in conjunction with the representative voices of people with disability, a school to post school transition strategy for young people with disability

Around 13% of Australian children under the age of 18 are registered as having a disability. The COAG Reform Council identified that 1 in 3 inactive 15-19 year olds not in education, training or employment was in receipt of DSP. In 2011, less than 2% of people with disability were enrolled in an apprenticeship or traineeship, with people with disability also significantly under-represented in vocational education and training.

AFDO believe that a strong national transition system which supports young people with disability to transition from school to post school options, including employment, is one of the most effective strategies to address the low employment rate of people with disability in the future. The success of this strategy is dependent on an approach that crosses a number of sectors and jurisdictions and spans the range of income support, disability, health, employment and education and training portfolios.

AFDO recommends that the Australian Government investigate State, Territory and independent pilots which are leading to solid post school and employment outcomes for people with disability. AFDO highly supports the establishment of a national network of school to work transition services that build expectation, develops self-determination and provides evidence based support to move youth with disability into work, such as the Ticket to Work concept. AFDO also supports the recommendations put forth in the Workability II report regarding transition to work¹¹.

¹¹ Human Rights and Equal Opportunity Commission

When considering the recommendations of the recent CEDA report, skilling up young people with disability to be able to work in the jobs of the future becomes all the more critical – without this intervention, the employment gap will only continue to grow.

Conclusion

Closing the gap in the employment of people with disability as compared to the Australian population necessitates a longer term approach – an approach that involves businesses and people with disability as co-developers and drivers of a new way forward.

Up to this point, policy and workforce strategies have been largely developed by government in isolation of input and direction by people with disability and business representatives. For reforms to be successful, business and people with disability must be key decision makers and drivers, with a focus on the changing landscape of work and what will be needed to enable people with disability to contribute.

Addressing the entrenched unemployment and under-employment of people with disability is a complex, multi-faceted issue. This submission has proposed a range of interconnected measures to address employment disadvantage now and into the future.

As has been outlined, a multitude of approaches are needed, with no one approach alone likely to be successful. Likewise, an approach which brings together people with disability, business and industry, government and other key players will be critical to not only develop strategies, but ensure that these strategies are implemented, monitored and have accountability measures so that people with disability do not fall further behind and can be contributors to Australia's future economy.