AUSTRALIAN NETWORK ON DISABILITY SUBMISSION TO THE EMPLOYMENT WHITE PAPER (30 November 2022)

Australian Network on Disability strongly supports the Australian Government’s development of an Employment White Paper and is grateful for the opportunity to provide input and recommendations. This submission specifically relates to the topic of **Full Employment.**

# WHO WE ARE

Australian Network on Disability (AND) is a national, membership-based organisation that helps organisations welcome and retain people with disability into all aspects of business.

We work with our 400 member organisations - who in combination employ around 2.2 million people or 18% of Australia’s workforce - to remove barriers that limit opportunities and prevent the employment and advancement of people with disability.

As the peak body for disability inclusion in the workplace we provide expert guidance, services and programs to employers, Government representatives and industry bodies. Our mission is to create a disability-confident Australia. We are also part of global networks, notably the International Labor Organisation (ILO), Valuable 500, Purple Space and Open Inclusion.

In addition to building disability confident workplaces, AND gives organisations the tools they require to become disability confident recruiters. AND helps organisations introduce workplace adjustments, finds internships for university students with disability, connects jobseekers with disability to mentors, and partners with the Australian Institute of Company Directors (AICD) to provide leaders with disability with the skills and opportunities they require to join Australian boards.

AND’s programs and services are based on rigorous analysis of what works. We have developed efficient, low-cost and effective processes and programs to increase the employment of people with disability and empower Australian organisations to become disability confident recruiters.

# SUBMISSION SUMMARY

To achieve the Employment White Paper’s objective of full employment it is critical to address the significant employment gap between people with and without disability.

AND undertakes regular reviews of the recruitment processes in Australian organisations. It is evident that jobseekers with disability are consistently excluded from the workforce, largely due to unintended barriers including attitudes, a lack of confidence when dealing with people with disability and misconceptions regarding the risks and costs of employing people with disability.

In this submission we outline recommendations based on our knowledge and experience accumulated over 22 years.

AND recommends initiatives including greater awareness and adoption of JobAccess, transparent targets for the employment of people with disability, inclusive and targeted recruitment processes, improved transition from education to employment and initiatives to increase the representation of people with disability on boards and in C-Suite positions.

# Recommendation 1: Promote greater awareness and use of JobAccess

In November 2022, AND surveyed its 400 member organisations about their recruitment of people with disability, their workplace adjustment policies, and their use of JobAccess.

Of the 139 responses, only 35% have accessed the Employment Assistance Fund through JobAccess.

Of these 35% who accessed the service:

* Members were most likely to use JobAccess for advice and training, reimbursement for adjustment costs (equipment and other services) and free workplace assessments
* 97% rated the customer experience of JobAccess between Good to Excellent
* 83% rated the application and claim experience of JobAccess between Good to Excellent, with 17% of those accessing the service claiming a ‘Not Good’ to ‘Unsatisfactory’ application and claim experience

The main reasons why 65% of our members have not accessed JobAccess were:

* A lack of awareness of the existence of JobAccess or its function
* Have not had the need to use Job Access\*
* Unsure / don’t know why they have not accessed JobAccess
* Limited structures and processes in place (formal Workplace Adjustment Policy and Guidelines) which outline how to tap into JobAccess
* Adjustments are funded through the organisation

\*AND infers two things from the fact that some have not had the need to use JobAccess:

* The majority of adjustments are free / under $500; and
* There is limited demand from organisations requesting adjustment reimbursements as there are still only small numbers of people with disability employed in the workforce.

Among our members who use JobAccess, many report that the current structure does not allow employees with disability to allow an employer representative, (such as a HR disability inclusion specialist), to apply for and arrange adjustments on their behalf.

As a result, employees with disability spend considerable time organising their own adjustments.

In addition, the allocation for Auslan interpreters or live captioners has not increased since JobAccess began in 2006. It does not sufficiently cover the cost for employers and can be deemed as an unreasonable hardship.

AND strongly supports JobAccess, however we encourage the Australian Government to recognise there is a need to improve awareness of this program among employers and to simplify the process of arranging workplace adjustments. AND would welcome the opportunity to collaborate with the Government in this endeavour.

# Recommendation 2: Employer-and-government-determined targets

The unemployment rate of working age people with disability (10%), is more than twice that of those without a disability (4.6%). [[1]](#endnote-2) Australia has one of the lowest employment rates for people with disability in the OECD*,* ranking 21out of 29 nations, and the employment rate for people with disability has remained stagnant for decades. [[2]](#endnote-3)

It is estimated that the economic benefits of employing people with disability would add over $50 billion to GDP by 2050 – but only if Australia were to move up into the top eight OECD countries for employment of people with disability. [[3]](#endnote-4)

However, in a YouGov survey of 500 Australian middle managers and HR professionals released in July this year 50% of respondents said their organisation had never employed a person with disability and, alarmingly, nearly one in 10 admitted they wouldn’t want to in the future.[[4]](#endnote-5)

The results indicate a disturbing lack of motivation, and even reluctance to employ people with disability, further borne out by the substantial employment gap between people with and without disability.

Overcoming this reluctance requires leadership by Federal and State governments and our largest, most influential employers.

AND recommends the voluntary introduction of employment targets for people with disability, as determined by individual governments and employers.

In 2017 the UK government announced its target to see a million more people with disability in employment by 2027. The latest figures from the UK Office for National Statistics for 2022 revealed the number of people with disability in employment had increased by 1.3 million since 2017, beating the target by 5 years.[[5]](#endnote-6)

The UK Minister for Disabled People, Health and Work Chloe Smith MP said: “This is an important milestone showing our commitment to supporting disabled people to lead independent lives and reach their full potential.” [[6]](#endnote-7)

The target was supported by a range of government initiatives, including a Disability Confident scheme, which helps and encourages employers to champion inclusive recruitment practices.

In Australia, Telstra made a commitment to ensure 10% of their graduate program participants were people with disability by 2019. By using AND’s Stepping Into program Telstra exceeded its goal by 2018.[[7]](#endnote-8)

The introduction of publicly declared targets is an effective tool for motivating a change in recruitment and employment practices.

# Recommendation 3: Promote the specific targeting of people with disability in recruitment, using the Australian Human Rights Commissions’ Guidelines for the Targeted Recruitment of People with Disability, and trialing a pilot program to extend the RecruitAbility program to the private sector.

AND has found – after more than two decades reviewing employers’ recruiting methods - that jobseekers with disability are significantly disadvantaged, and commonly excluded from the recruitment process.

Many employers don’t give jobseekers the opportunity to request adjustments for the job application and interview process. For example, employers regularly eliminate jobseekers who are unable to participate in a phone call because they are hearing impaired.

In November 2022 the Australian Human Rights Commission released Guidelines for the Targeted Recruitment of People with Disability. [[8]](#endnote-9)

“One method an employer can use to increase its number of employees with disability is to undertake a targeted recruitment strategy, which is a recruitment campaign that solely targets people with disability,” the AHRC’s Disability Discrimination Commissioner Ben Gauntlett said.

The Guidelines outline measures that make recruitment campaigns that specifically target people with disability lawful under the Disability Discrimination Act and state and territory equal opportunity or anti-discrimination legislation.

AND supports the promotion and use of the Guidelines which provide employers with practical support to employ people with disability.

AND also recommends extending the Australian Public Service’s (APS) RecruitAbility scheme beyond the APS to the private sector, NGOs and state governments.

The scheme guarantees job interviews for candidates with disability who opt into the scheme and meet the minimum requirements of the advertised position.

We recommend trialing a pilot program of the scheme in the private sector, with organisations who employ more than 500 employees.

A targeted approach and focus on the recruitment, retention and advancement of employees with disability is essential to improve employment outcomes for individuals, employers and the economy.

# Recommendation 4: Better enable the transition from education to employment for young people with disability by a) ensuring training provided to young jobseekers with disability is directly linked to a vacancy with a disability confident employer, b) incentivise employers to provide internships for people with disability through AND and c) requiring Disability Employment Services to adopt the Gradwise model, which focuses on career development rather than rapid, entry level job placements.

Australia’s Disability Strategy 2021-2031 identifies the need to improve the transition from education to employment as a key policy priority to improve employment outcomes and financial security for people with disability. [[9]](#endnote-10)

1. There is a clear demand among school-leavers for work experience and pre-employment training that follows demand-led principles which link young people with disability with real employers with real jobs.

A November 2021 review of the Government’s School Leaver Employment Supports (SLES) initiative surveyed 5,582 participants who utilised the program, which was designed to build employment skills, confidence and capacity for young people with disability. [[10]](#endnote-11)

44% of the 651 respondents said that providers helped them to arrange work experience in an area of interest, however less than 30% said they were supported to undertake courses to pursue employment goals.

Participants felt services could be improved by providers spending more time getting to know them (57%), arranging more work experience (52%), and offering more skill building opportunities (42%).

AND recommends SLES providers work with disability confident employers to offer work experience and pre-employment training based on demand-led principles.

1. AND’s Stepping Into internship program finds university students with disability who are in the second last or final year or recently graduated and connect them with employers. Employers host the successful applicants as paid interns during their winter and summer semester breaks.

In the 2021-22 financial year 296 students completed Stepping Into internships and 87 were offered ongoing or contract extensions. Among the members who hosted interns 98% said they would participate again, and 97% reported they felt confident in managing and supporting an employee with disability after doing the program. After completing the program 91% of interns felt better prepared for the workforce.[[11]](#endnote-12)

AND would welcome the opportunity to work with Government to explore ways to incentivise employers to offer internships to better prepare university graduates with disability to enter the workforce.

1. The Australian Governments’ service funding model to support disability employment services can be better designed to improve outcomes for people with a disability in respect to career development.

Disability Employment Services currently focus on quickly placing a jobseeker into employment regardless of the job type and whether that aligns to their career aspirations or experience. This funding model is erosive to the long-term career development.

AND member RMIT reports the experience of one of its PHD-qualified students who has a disability and approached a disability employment provided for a job. Their suggested placement was a job as a cleaner. The student was advised they would lose their job seeker payment if they did not take this offer. The student simply wanted to work in the field that made use of their skills and education.

Disability Employment Services need to be incentivised to support career development.

GradWise is an example of good practice. Gradwise, a graduate employment program developed with Australian universities, does not measure outcomes on how quick a placement is undertaken but measures long-term retention once a student is placed in the job.

# Recommendation 5: Increase the number of people with disability on boards and in C-suite positions by a) extending disability leadership initiatives and b) establishing a career development symposium with government and employers.

More than 2 million Australians of working age have a disability however they are almost entirely unrepresented on Australian boards.

Inclusion, diversity, and equity cannot be met if people with disability are not part of decision making across business. Without board and executive representation businesses are not making informed decisions with true market representation.

*“The conversation on disability employment has been around entry level employment for too long – I would like to see career development approaches that are highlighting the importance of seeing disability in our executive teams, around our board tables.”* Katie Wyatt, Head of Diversity & Inclusion, Coles Group (AND Gold Member)

1. AND’s Disability Leadership Program was a pilot offered in partnership with the AICD for people living with disability to boost their leadership and senior executive skills to undertake board positions.

The full-fee scholarship program was expected to offer 85 positions in its first year however 300 applicants applied for the program, funded by the **Australian Government Department of Social Services.** Due to the strength of applications received, 100 places were offered and accepted. Another 100 scholarships are also available in the second round of the program, with applications opening in January 2023. [[12]](#endnote-13)

AND recommends extending funding for the program beyond the current 2-year agreement.

Launched in April 2022, the AND’s Directing Change Scholarship originally sought 15 senior leaders with disability to apply however due to the overwhelming response (228 applications), the program was extended to include 22 executives.[[13]](#endnote-14)

The 22 leaders with disability undertook either the Foundations of Directorship program or the Company Directors Course at the AICD.

The program included the opportunity to be mentored by a board director. Almost 300 directors submitted requests to mentor the scholarship recipients. Directors underwent disability confidence training and were supported by AND as they learnt about removing barriers and becoming accessible to people with disability.

1. Establish a Career Development Symposium, led by AND and co-created with employers to chart out a 5-year career development initiative designed to facilitate the appointment of people with disability to leadership positions in the C-Suite in the public, private and not-for-profit sectors.

# CONCLUSION

Despite considerable effort and goodwill from government and industry, the rate of employment for people with disability has not improved in decades. In fact, the unemployment rate of people with disability has risen from 8% in 2003 to 10% in 2022, compared with a 50-year-low of 3.4% for all Australians.

A concerted effort to implement evidence-based initiatives is urgently required to give people with disability the same opportunities as all jobseekers, and to achieve the Government’s goal of full employment that benefits all Australians.

We strongly encourage Government to consider the introduction of voluntary targets; to examine the lack of awareness and ease-of-use issues with JobAccess, to help school leavers with disability gain employment, and implement programs to achieve more effective recruitment and career development for people with disability. We would welcome the opportunity to work with the Australian Government to achieve a greater representation of leaders with disability in board and C-suite roles.

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3. Australian Human Rights Commission, Willing to Work, National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability. <https://humanrights.gov.au/our-work/disability-rights/publications/willing-work-national-inquiry-employment-discrimination> [↑](#endnote-ref-4)
4. YouGov/Jigsaw Australia. Disability Employment Research. June 2022. <https://jigsawaustralia.com.au/wp-content/uploads/sites/5/2022/07/YouGov-Jigsaw-Disability-Employment-Research-Summary.pdf> [↑](#endnote-ref-5)
5. UK Office for National Statistics. May 2022. <https://www.gov.uk/government/news/government-hits-goal-to-see-a-million-more-disabled-people-in-work> [↑](#endnote-ref-6)
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11. Australian Network on Disability 2021-2022 Annual Report [↑](#endnote-ref-12)
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13. Australian Network on Disability 2021- 2022 Annual Report [↑](#endnote-ref-14)