Australian Disability Network

Submission to inform the NSW Government’s response to the Disability Royal Commission’s recommendations

Australian Disability Network welcomes the opportunity to provide input into the NSW Government’s response to the recommendations developed by the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (DRC).

# WHO WE ARE

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

We work with our 450 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 career 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 vision is to create a disability confident Australia.

In addition to building disability confident workplaces, Australian Disability Network gives organisations the tools they require to become disability confident recruiters.

Australian Disability Network 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 to provide leaders with disability with the skills and opportunities they require to join Australian boards.

We work with employers to provide opportunities for career advancement for people with disability and encourage greater representation of people with disability in leadership roles.

# SUBMISSION

We are responding to Question 1***:*** *Which recommendations do you think are most important, and why?*

The 222 recommendations outlined in the DRC’s final report shine a light on the breadth and depth of challenges Australia must overcome to become truly inclusive of people with disability.

We support many of the DRC’s recommendations, however Australian Disability Network considers inclusive and meaningful employment to be essential for the financial, physical, and mental wellbeing of all people with disability.

The 30% employment gap for people with disability compared to people without has barely changed in over 20 years.

The DRC’s final report clearly shows we need significant change, greater action, and concrete goals to address this entrenched problem.

Therefore, we consider recommendation 7.19 critical to improving everyday life for people with disability.

*(Recommendation 7.19 Establish specific disability employment targets for new public service hires in agencies and departments. The Australian Government and state and territory government departments and agencies should be required to set a target to ensure that a proportion of new public service hires to their respective workforce are people with disability. The target should be at least 7 per cent by 2025. The target should increase to at least 9 per cent by 2030.)*

Although we welcome the Recommendation 7.19, we believe employment targets must also be implemented more broadly across the private sector – with the recommendation of governments - to bring about the very real change that is required to create a truly inclusive, disability-confident Australia.

We understand that despite good intentions and a commitment to increase disability representation in the workforce, some organisations are reluctant to set targets.

Different to quotas, targets are set by the business. They provide a goal to work towards and ensure that accessibility and inclusion is front of mind, particularly among leadership teams.

# THE CURRENT STATE OF DISABILITY EMPLOYMENT TARGETS IN AUSTRALIA

Australian Disability Network’s research and a survey of our network of member organisations in late 2022, shows a significant variation in employers’ views towards the use of employment targets and how they should be implemented and reported.

Our employer survey revealed that of 98 responses received across public, private and NFP sectors, 68% of members currently do not have disability employment targets.

Of the 32% of members that set targets: 21% had targets published both internally and externally (90% public sector). 11% had targets published internally only (45% public sector, 45% private sector).

# WHY EMPLOYMENT TARGETS MUST ALSO BE IMPLEMENTED MORE BROADLY ACROSS THE PRIVATE SECTOR

The Hon Ronald Sackville AO KC, Chair of the Disability Royal Commission, stated during Public Hearing 9: Pathways and barriers to open employment for people with disability, that; *“employers must introduce additional measures to increase the workforce participation rates of people with disability… There are large numbers of people who are willing and able to work productively but are prevented from doing so by community attitudes and employment practices that in many respects belong to another age… They, especially the large employers, have a responsibility to lead the way, not just by adhering to their legal duties, but by promoting attitudinal and cultural changes within their organisations and in the wider community.”*

Graeme Innes AM, Former Disability Discrimination Commissioner said.

*“What you don’t count, doesn’t count… The only way to get people with disabilities into employment is to set targets and then develop strategies to achieve those targets.”*

Australian Disability Network has identified targets as a powerful tool todrive positive organisational change.

What gets measured gets done.

In our experience, targets:

* Demonstrate commitment; setting targets can motivate an organisation to articulate and clarify what is important and that disability employment is being taken seriously.
* Can catalyse action and motivate an organisation to focus on an objective, be accountable and build momentum.
* Demonstrate ambition and can boost competitive advantage; setting targets and promoting these externally can positively impact brand, reputation, and an organisation’s profile as an employer of choice in a competitive job market.
* Indicate an organisation-wide approach, meaning that they are more likely to be built into key performance indicators of managers across an organisation.
* Enable organisations to identify and unlock a broader talent pool.
* Increase and elevate the conversation about disability employment, both with internal and external stakeholders. Increasing conversations about disability and the visibility of disability in the workplace helps support a more diverse and inclusive workplace.

# TARGETS MAKE A DIFFERECE

*CASE STUDY: AGL*

AGL established a Disability Working Group (AGL Ability) in 2021 to create and foster a safe and supportive workplace for employees with disability. AGL Ability has four primary areas of focus, including facilitating an improved capacity to employ, develop and retain people with disability.

AGL’s first Disability Action Plan (DAP) was developed in 2021 to address these four primary focus areas. AGL is committed to increasing the number of people with disability in its workforce and the activities identified in its DAP clearly further this goal. AGL’s FY23-FY24 DAP states that AGL is “committed to employing and supporting people with disability within our workplace and aim to increase our representation of people with disability at AGL by the end of FY24”.

**Since 2021, the number of people in AGL’s workforce identifying with disability has increased from 2% to 9%.** This can be attributed to having more open discussions about disability, ensuring people with disability feel safe to share their disability status, encouraging more people with disability to apply for jobs, updating its DAP and providing education and training to the organisation.

AGL tracks its progress through an anonymous biennial diversity survey which asks employees if they live with disability. In addition, online systems are being updated to enable employees to add information about workplace adjustments to their employee profiles.

# THE IMPORTANCE OF GOVERNMENT ENDORSEMENT

In 2017, the UK government set a goal to see 1 million more people with disability in work by 2027. In the first two years, the number of people with disability in work increased by 404,000. The target was exceeded by May 2022, with 1.3 million more people with disability in employment, five years ahead of schedule.

[Government hits goal to see a million more disabled people in work - GOV.UK (www.gov.uk)](https://www.gov.uk/government/news/government-hits-goal-to-see-a-million-more-disabled-people-in-work)

The government introduced several initiatives to increase employment for people with disability. One of these, the Disability Confident scheme, helps employers create more accessible and diverse workforces by championing inclusive recruitment practices. The scheme, which covers 11 million paid workers, helps employers think differently about disability, and improve how they attract, recruit, and retain disabled workers.

Ford, Sainsbury’s, Hilton, and Coca-Cola are among the thousands of organisations across the UK signed up to the scheme aimed at boosting the number of disabled people in work.

# HOW TO INTRODUCE TARGETS

Targets should be based on thorough review and analysis of baseline data. Targets need to be specific, measurable, achievable, realistic, and time bound.

Targets can be applied in different ways, based on an organisation’s objectives and structure. They may be applied as an overarching, whole of organisation target that relates to representation.

For example, Medibank set a general disability employment target of 6.5% for FY23 across their whole organisation. Alternatively, organisations may consider setting targets that apply to particular functions or business units, such as recruitment and retention, retail or administration functions.

Organisations can choose to set targets internally or externally, but reporting on those targets should be non-negotiable. The following guiding principles should be considered when introducing targets:

* Be clear: communicate clearly what the organisation is trying to achieve, whether that is a percentage of the whole workforce, a percentage of new recruits or a target number.
* Be realistic: assess what is achievable for the organisation, taking into account potential barriers and any gaps in processes and support mechanisms that may impact the achievement of targets.
* Develop the target in consultation with people with disability: organisations should seek and include feedback and involvement of employees with disability when developing their targets.
* Understand who will be responsible and accountable for the target: ensure those managers responsible have the authority to initiate activities and influence outcomes. Consider building targets into key performance indicators so that they are prioritised appropriately.
* Build momentum: consider short-term, interim goals to support the nominated target. This will enable the organisation to monitor progress effectively and allow for flexibility as well as acknowledging incremental successes and building support.

Targets should be introduced after careful consideration of your organisation’s disability confidence and analysis of the disability access and inclusion initiatives undertaken by your organisation. Regular measurement and reporting are proven to strengthen focus, inform decision-making to improve results and drive action.

*“Organisations need to set their own realistic and achievable targets. However, targets are not a quick fix. Targets should be introduced only after accessible recruitment practices are introduced, and processes to ensure the long-term retention and career progression of people with disability are established. The careful introduction of targets opens the door to equitable employment, an inclusive workplace culture and long-term business benefits."*

Corene Strauss, Chief Executive Officer, Australian Disability Network

# SUMMARY

In consultation with our 450 members, Australian Disability Network created an in-depth [Business Case for Disability Employment Targets](https://and.org.au/wp-content/uploads/2023/10/final-business-report.pdf) which outlines the rationale for targets rather than quotas, cautions to consider when setting targets, barriers and enablers to setting and achieving disability employment targets, how and when companies can introduce targets, local and international case studies outlining how Australian organisations are utilising targets.

We have also developed a series of How to Guides which cover:

* How to capture disability employment data
* Inclusive Recruitment Practices
* Offering and Implementing Workplace Adjustments
* Building a Disability Confident Culture.

Australian Disability Network would welcome the opportunity to collaborate with the Federal and State governments to develop guidelines for setting and achieving targets among the private sector, to increase the employment of people with disability.

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