Australian Disability Network welcomes the opportunity to provide input into the Review of Australia’s Disability Strategy 2021-2031.

**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 460 member organisations - which employ around 2.2 million people or 18 per cent 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 to create systemic change.

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.

We help organisations introduce workplace adjustments, find internships for university students with disability, and connect jobseekers with disability to mentors.

**Introduction**

Australian Disability Network supports the implementation of Australia’s Disability Strategy (ADS) and the priorities it provides for all levels of government to improve the inclusion, and participation of people with disability.

Despite considerable efforts by governments and advocacy organisations in Australia, the unemployment rate for people with disability remains stubbornly high. In 2022, the unemployment rate for people with disability was 7.5 per cent, more than double the rate for those without disability (3.1 per cent). [1]

In September 2023 the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (Disability Royal Commission) released its Final Report [2] which identified 26 barriers to employment for people with disability including;

• Employers incorrectly assume hiring people with disability will be costly, ‘burdensome,’ less productive, and risky, which may result in overlooking a person’s unique skills.

• Discriminatory attitudes and behaviours, during recruitment and in the workplace.

• Employers lacking knowledge, skills, leadership, and resources to support people with disability.

• Employers refusing to provide flexible work arrangements or workplace adjustments including during recruitment.

The Disability Royal Commission’s (DRC) final report clearly shows we need significant change, greater action, and concrete goals to address the disability employment gap between people with disability and those without disability.

Australian Disability Network considers inclusive and meaningful employment to be essential for the financial, physical, and mental well-being of all people with disability.

Our feedback to the Review of Australia’s Disability Strategy 2021-2031 will respond to questions regarding Outcome Area: Economic and Financial Security, which addresses the transition from education to employment and employment barriers.

***Question 1: Do you agree that addressing employment barriers and post-school transitions should be priorities for future work under ADS?***

**Australian Disability Network strongly agrees that removing employment barriers for people with disability, from the recruitment process to employment to career advancement, should be a priority under the ADS**.

For many jobseekers with disability, the first employment barrier is the traditional job application process which often fails to provide potential applicants with the opportunity to request adjustments during the recruitment process.

Many jobseekers and employees do not realise they have the right to ask for adjustments or fear being discriminated against if they ask for adjustments. [3]

In our experience 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 hiring people with disability.

Once employed, people with disability are often relegated to entry-level roles with little or no career advancement opportunities.

Recent research by the Diversity Council of Australia and Australian Disability Network revealed 43 per cent of employees with disability reported (sometimes, often or always) having people make incorrect assumptions about their abilities because of their identity (compared to 28 per cent of employees without disability) [4]

People with disability also remain greatly underrepresented in senior leadership or board positions. 70 per cent of Australian leaders and emerging leaders with disability experience barriers to undertaking leadership opportunities and development [5]

Only 14 per cent of Australian organisations have people with disability represented in their senior management, and only 5 per cent of organisations have people with disability represented on their board.[6]

***Question 2: How should ADS take action to decrease employment barriers?***

**• Australian Disability Network recommends a whole of government approach is required to remove employment barriers, with consistent applications of Affirmative Measures, inclusive recruitment practices, and consistent workplace adjustment practices.**

We urge all levels of government to encourage and support employers to implement inclusive recruitment processes and accessible workplace adjustment policies and to promote the benefits of an inclusive workplace. However, governments must lead by example. We recommend that governments model inclusive behaviour by consistently offering workplace adjustments, offering internships to students and jobseekers with disability, and reviewing their inclusive practices.

Organisations that embrace leading practices for employing and supporting people with disability have 28 per cent higher revenue, twice the net income, and 30 per cent higher profit margins than their peers not implementing best practice. These organisations are also 2 times more likely to have higher shareholder returns. [7]

We encourage the ADS to prioritise the importance of workplace adjustments that benefit not only people with disability but also employers.

Australian Disability Network’s recent report, “Getting Workplace Adjustments out of the too-hard basket,” comprised 400 survey responses and interviews with people with disability and 200 survey responses and interviews with organisations.

Nearly half (46 per cent) of people with disability said they experienced increased job satisfaction as a result of receiving workplace adjustments, and 40 per cent said they experienced decreased job satisfaction as a result of not receiving workplace adjustments.

Employers also benefitted with 84 per cent of organisations reporting that increased access to a broader talent pool was one of the great benefits of workplace adjustments.

• **Commit to accessible procurement processes, using the Technology Accessibility Selection Tool which supports organisations to procure accessible and inclusive technology.**

Organisations with accessible technology can better serve their customers and employees and remove barriers that prevent greater inclusion of people with disability.

The Australian Disability Network’s Technology Charter sets out 10 commitments to good practice on Information and Communication Technology (ICT) accessibility and is supported with [tools and resources](https://australiandisabilitynetwork.org.au/resources/suppliers-and-partners-accessible-procurement/) that will make it easier for organisations to select accessible technology.

By signing the Charter, organisations agree to implement 10 commitments as part of their technology strategy, including developing and buying accessible systems. Signees agree to:

1. Appoint an Accessible Technology Champion to promote this Charter, monitor its implementation, and report to our C-suite executives on our

progress towards buying accessible technology and services, and designing and developing inclusive digital content.

1. Establish our performance baseline through a Digital Accessibility Maturity Assessment and undertake regular benchmarking and reporting as part of our Accessibility Action Plan process.
2. Include accessibility as a key requirement in our business decisions, in our procurement processes and build relationships with supplier partners to develop and deliver accessible products and services for relevant agreements and/or procurement categories.
3. Promote a development lifecycle for our technology solutions based on inclusive design from definition to delivery and avoid increased cost and reputational risk triggered by retrofitting products and systems.
4. Enable built-in accessibility to allow reasonable personalisation of technology by our colleagues and customers.
5. Increase our employees’ knowledge and skills of digital accessibility so they are aware of how accessible technology liberates the contribution of customers and colleagues.
6. Routinely consult with colleagues, customers, and experts with disability to ensure that we understand the impact of our technology on talent management, colleague productivity, and our diverse customer base.
7. Consistently aim to go beyond minimum compliance to bring greater benefits to our business and share best practices with others.
8. Develop a consistent approach to addressing ICT / digital accessibility requirements in procurement practices in line with the Australian standard (AS EN 301 549).
9. Continue to re-imagine ways to establish accessible technology solutions to enable us to attract skilled and talented jobseekers with disability, retain employees who have or acquire disability, and engage with customers with disability.

The Charter was developed by Australian Disability Network’s Accessible Procurement Taskforce, led by Matt Hawkins, Director Procurement, University of Melbourne, in collaboration with Microsoft, Telstra, Services Australia, OZeWAI, ANZ, and Australian Disability Network’s former CEO, Suzanne Colbert.

• **Regularly reporting on the disability maturity of the Australian Government using the Access and Inclusion Index to ensure progress is being made - what gets measured gets managed**. **We recommend the Australian Disability Strategy make it compulsory for the Australian Government to measure its disability confidence and publicly report its scores to identify where improvements are needed.**

Organisations that regularly measure and report on their progress towards creating an inclusive workplace are better equipped to improve their results. Australian Disability Network’s Access and Inclusion Index gives organisations insights into their strengths and helps them identify opportunities to be accessible and inclusive of people with disability. Ninety per cent of the Top 10 Performers in The Access and Inclusion Index are repeat participants.

The Index enables organisations to check and assess their current access and inclusion maturity across key business areas and provides a roadmap for year-on-year progress.

• **Set up an advisory panel of employers that can give feedback about what's working and not working.**

The removal of employment barriers is not possible without the consultation and cooperation of employers. The viewpoint and input of Australian employers are

essential to drive systemic change in recruitment practices, attitudes, and employment processes.

Australian Disability Network has 460 member organisations including most of the nation's largest companies, universities, and cultural organisations.

We would welcome the opportunity to advise and facilitate the development of a Disability Employment Advisory Panel to review the ADS and provide feedback including examples of successful case studies and initiatives within their organisation that could be replicated by other employers.

**• Introduce voluntary and publicly-declared targets for the appointment of people with disability on public sector boards and government committees**.

Diverse boards have a greater insight into their staff, customers, and communities. We believe the most effective way to increase disability employment is for employers to appoint high-performing individuals with disability into leadership roles so they can help drive change from within.

In 2023 the Australian Government announced a Review of Public Sector Board Appointments Processes which culminated in a Final Report which is currently under consideration by the Government. We recommend the report be released to the public and we encourage the Government to take affirmative action to increase the diversity of government boards and committees.

***Question 3: How should ADS take action to improve post-school transitions?***

**Greater promotion of evidenced-based pathways that have successfully helped students transition into the workplace. Australian Disability Network’s award-winning Stepping Into Internship Program (SIP) and Positive Action towards Career Engagement (PACE) program.**

There is a demand for programs that support students and graduates to transition from education into the workplace.

Our Stepping into Internship program gives university students and recent graduates with disability the opportunity to undertake a paid internship with one of our member organisations.

 In 2023-24 86 of our member organisations hosted at least one intern and 234 internships were completed **from 800 applications**. The program breaks down outdated stereotypes and misconceptions about the capabilities of people with disability.

Interns learn new skills while gaining confidence and valuable connections which enhance their employment opportunities.

The program also builds organisations’ disability confidence and increases their awareness of disability.

**100 per cent** of organisations that participated in SIP in 2023-24 reported increased disability confidence and awareness

**100 per cent** Rated the intern’s work to have met or exceeded their expectations

**95 per cent** said they would participate again

The interns made valuable contacts and learned interviewing and workforce skills.

**100 per cent** Of interns reported feeling better prepared for the workforce

**100 per cent** Would recommend the program to other students

PACE is an internationally recognised mentoring program that brings people together to learn, develop and progress their career skills. Mentors increase their disability confidence and leadership skills, while students and jobseekers with disability gain

vital workplace understanding, increase their confidence, and expand their networks.

***Question 4: In what other ways could we improve this Outcome Area?***

**Greater consultation with employers and opportunities to engage with employers**

• Focus on supporting Australian businesses through collaborations and partnerships with the Australian Chamber of Commerce and its affiliates, the Business Council of Australia, the Australian Institute of Company Directors, and COSBOA, to educate their members on inclusive hiring practices.

• Support mainstream organisations to become accessible and inclusive by working with large mainstream recruitment platforms and requiring them to be disability confident. Ensure that all job ads are accessible, adjustments are offered, and application portals are accessible.

• Encourage the private sector to adopt disability employment targets similar to the public sector targets recommended by the Disability Royal Commission in recommendation 7.19 - that a proportion of new public service hires 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 the Australian Disability Network welcomes 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.

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.

Targets are a powerful tool todrive positive organisational change.

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.

• Enable organisations to identify and unlock a broader talent pool.

Targets can be applied in different ways, based on an organisation’s objectives and structure however they should be based on a thorough review and analysis of baseline data. Targets need to be specific, measurable, achievable, realistic, and time bound.

In consultation with our 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.

**Case Study - Medibank**

Medibank sets publicly declared targets for the employment of people with disability with the goal of increasing the target year-on-year. They exceeded their FY2023 target of 6.5 per cent and are aiming to exceed their current level of 6.7 per cent to reach 7 per cent by FY2024. Medibank tracks its progress through an anonymous engagement survey which allows employees to identify as having disability and the results are published in its Annual Report, in its Sustainability Report and its Access and Inclusion Plan. The organisation has found that setting targets provides a tangible objective for their accessibility and inclusion work and is critical to ensuring disability employment is front of mind, particularly among its leadership team.

Australian Disability Network also developed a series of How to Guides for employers which cover:

• How to capture disability employment data

• Inclusive Recruitment Practices

• Offering and implementing Workplace Adjustments

• Building a Disability Confident Culture

**In Conclusion**

Without the “buy-in” from employers it is unlikely that the entrenched employment gap between people with and without disability will improve.

In a YouGov survey of 500 Australian middle managers and HR professionals released in 2022, 50 per cent of respondents said their organisation had never hired a person with disability and, alarmingly, nearly one in 10 admitted they wouldn’t want to in the future. [8]

The underrepresentation of people with disability in the workforce is due to deeply entrenched ideologies and practices that must be critically analysed and addressed through long-term systemic change.

The change cannot be achieved without extensive consultation and support from the gatekeepers of our workforces – Australian employers.

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