



# Submission to the Department of Social Services

A New Disability Employment Support Model

February 2022

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## Introduction

Finding and maintaining a job is the most significant challenge facing Australians who are blind or have low vision. For decades, we have experienced levels of unemployment and under-employment much higher than the average for people with a disability, and therefore many times higher than for the community in general.

In 2018, [a collaborative survey](#) between Vision Australia, CNIB and the Blind Foundation of New Zealand found that in Australia, only 24 per cent of people who are blind or have low vision were in full-time employment. Canada and New Zealand both had higher full-time employment rates, with 28 per cent and 32 per cent respectively.

[Recent research](#) by Vision Australia confirms that employer attitudes are the most significant obstacle to employment of our cohort. Their survey found that 83 per cent of employers were “not confident” in hiring a person who is blind or has low vision.

These disturbing statistics clearly indicate the continued necessity of Disability Employment Services (DES). But as the consultation paper notes, these services, despite recent attempts at reform, aren’t consistently achieving their goals. Recent changes to eligibility criteria for the scheme have also excluded people who are in desperate need of support.

Our members include DES providers, providers of specialist blindness and low vision services, and consumer advocacy organisations. This submission offers suggestions and solutions to key problems with the current DES model.

The new Disability Employment Support Model should:

1. Be accessible to any person who has a disability which impacts their functional capacity and the way employers perceive them, regardless of benchmarking.
2. Provide assessments of job capacity that recognise the needs and capabilities of people who are blind or have low vision.
3. Equip assessors and providers with resources, developed in collaboration with the blindness and low vision sector, which would inform them about our cohort.
4. Ask applicants about what support they feel they may need to gain and maintain employment at the assessment stage.
5. Encourage entry into the market of employment support providers that specialise in the needs of specific disability cohorts (e.g., blindness and low vision), and ensure people in that cohort are made aware of these providers.
6. Support a front-loaded training approach which would ensure people who are blind or have low vision are well-prepared when they find employment.
7. Create short and mid-term work experience or internship opportunities for people who are blind or have low vision, to help them learn key workplace skills.
8. Ensure employers are aware that they don’t need to fund modifications to their workplace to account for people with disabilities.
9. Not make providers responsible for enforcing mutual obligation requirements.

10. Simplify guidelines and compliance requirements for providers to encourage innovation.
11. Offer bonuses based on outcomes where a client has found employment in a field matching their tertiary qualification or where there are recognised skills shortages.
12. Be informed by extensive consultation with the sector, and thoroughly piloted before national rollout in order to encourage specialist providers for low prevalence cohorts to feel confident entering the market.
13. Spearhead improvement to employment rates of people who are blind or have low vision, and employer attitudes toward them.
14. Regularly report on the outcomes and satisfaction for specific cohorts (E.G., people with sensory disabilities) who access services.

## Responses to Consultation Questions

### Who should be able to access a specialist disability employment program?

Due to low awareness of the impact of vision disabilities, job capacity assessments for people who are blind or have low vision often result in benchmarks which are either too high or too low. Following a recent change to the eligibility criteria, people whose benchmark is set at 30 hours or more are deemed ineligible for access to Disability Employment Services.

In the absence of a second disability, many people who are blind or have low vision are capable of a full-time workload. This clearly doesn't diminish their need for support. The change in criteria seems to be based on a limited understanding of the problems employment supports should aim to solve. Our members believe that a more successful DES program must address the attitude problem for people who are blind or have low vision, which remains a barrier regardless of the number of hours a person can work.

Similarly, people who are assessed as being able to work less than 8 hours per week are not eligible for DES. Some assessors assume people who are blind or have low vision are capable of very little or no work. When a person is given a low benchmark, they are less likely to achieve significant improvements, because they are ineligible for the supports which might have built their capacity.

In addition, students are not currently eligible for DES to support access to part time jobs. This is inequitable, as these students miss out on the chance to work while they study as many of their sighted peers do. Minimising the opportunities for people who are blind or have low vision to study makes it difficult for them to compete with people who can demonstrate more experience in the workforce, compounding the other barriers they already face.

Without being on a Centrelink payment, people with very considerable vision loss, which demonstrably impacts the way they work, and the way they are perceived by potential employers, are denied access to DES. Our members have encountered cases of people in circumstances which prohibit their access to Centrelink payments, who are eager to find employment but cannot access supports due to this criterion.

Given changes to age pension eligibility age, and significant discrimination for older workers, eligibility to DES for people over 65 is also required. Recognising that the majority of vision loss is in older Australians, our members believe this restriction is no longer appropriate.

No person who is blind or has low vision should be denied the supports that might enable them to find and access employment. Eligibility criteria should be simplified so that people are eligible for support if they:

- A. Have a disability,
- B. Their disability impacts their capacity to work, and/or the way employers perceive them, and
- C. Are voluntarily seeking any level of employment, regardless of how much.

### **How can we simplify entry to the disability employment support model?**

One of the most significant problems for people who are blind or have low vision is the knowledge assessors have about their needs and capacities. This can result in inappropriate benchmarking, with capacity assessed as either too high or too low.

As a partial solution to this, tools and/or resources for assessors need to be developed. These resources would help them assess and understand the needs of people with vision disabilities, and recognise the complex intersections that occur when other disabilities are present. This should address the inconsistency of assessment results.

DES participants who are blind or have low vision tell us that, even when they are asked about how many hours of work they are capable of, they are rarely asked what support they might require to help them at work. This should be included in the assessment to assist the assessor in the referral process, and improve the efficiency of a participant's first appointment with their provider.

Our members also have found that the referral process doesn't provide sufficient information about the specialisation of providers. People who are blind or have low vision are often willing to travel further, or to conduct appointments remotely, in order to collaborate with a provider better equipped to advocate for them. In addition to geographical proximity, providers should also be categorised in terms of their specialist skills. Participants should be able to view their options either via specialty or proximity, so they can choose which factor to prioritise.

### **What employment services and supports would most help people with disability?**

The experience of people who are blind or have low vision accessing DES reflects comments in the consultation paper. Providers frequently direct them toward roles that don't match their qualifications, experience or goals. This trend, which is influenced by the attitude problem, could be at least partially addressed by the encouragement and promotion of providers specialising in particular cohorts. These providers would be most capable of accepting a person's employment goals and mapping the path toward them.

Given the absence of more traditional work experience options, the complexity of adapting entry level roles, and the difficulties associated with learning without the benefits of visual observation, people who are blind or have low vision often lack key skills which would help them compete in the workforce. The Employee Assistance Fund facilitates training in skills such as formatting documents and working with screen readers, but this training can only be accessed once a person

has already secured a job. This is a time and resource cost for employers and is especially harmful in instances where an initial trial period, supported by a wage subsidy, has been negotiated. Ideally, DES training supports would aim to prepare a participant for employment, by facilitating training in key skills necessary for the roles they're seeking. Vision specialists typically preference a model where the majority of supports are provided up-front. This approach often results in less necessity for post-placement supports.

The new Disability Employment Support model should promote services that:

1. Build the capacity of people with disabilities to increase their competitiveness and employability, and
2. Recognise the unique experience gaps, attitude problems and training needs associated with specific disability cohorts.

### **What employment services and supports would most help young people?**

Lack of access to DES while undertaking tertiary education is creating further disadvantage for young people who are blind or have low vision. Along with the time lost completing their qualification, these people then lose more time as they enter the system and develop strategies with their provider. DES must support university students to seek part time employment.

Most people without disabilities have numerous opportunities for unpaid work experience early in their lives. Given the complexity of adapting workplaces, this is rarely possible for people who are blind or have low vision. They may seek to enter the workforce without understanding foundational aspects of how workplaces typically operate, which most people take for granted. As a result, if they do find employment, a person who is blind or has low vision begins their working life facing the pressure of a new role, the complexity of ensuring the right adaptations are in place, and the additional stress of an unfamiliar environment, driven by unknown rules and social codes.

The new support model should prioritise provision of short to mid-term unpaid work experience roles to young people who are blind or have low vision, in collaboration with the Australian Public Service (APS), and other businesses that have made a commitment to leading by example.

### **What support do employers need to attract, employ and retain people with disability?**

In brief, if they are to become interested in hiring people who are blind or have low vision, employers need support to change their attitudes and reconsider their misconceptions about them. Vision 2020 Australia member Blind Citizens Australia's [An Eye to the Future](#) program, funded by an Information, Linkages and Capacity grant, is seeking to address the attitude barrier through symposiums, discussion workshops, online resources and paid internships. We also commend the recently launched [Includability](#) program, which will aim to prove the employability of people with disabilities through collaboration with high profile businesses. Vision 2020 Australia calls for DSS to support and fund similar, innovative, public-facing projects where and however possible, as these will improve the efficacy of employment supports for our cohort overtime.

The Employment Assistance Fund (EAF) is critical in supporting employers. While it is largely out of scope for this submission, members have found that:

- Many employers are not aware of it, and therefore assume they will need to fund necessary adaptations.
- Application processes are time consuming and often confusing for employers, and.
- With only few exceptions, adaptations must be delivered after a role has commenced, resulting in temporary lack of productivity while they are arranged.

Vision 2020 Australia calls for:

1. DSS to develop and roll out a promotional campaign designed to improve awareness of EAF amongst employers.
2. EAF access criteria to be modified, to allow some adaptations to be delivered before commencement of a role.

Increasingly, people who are blind or have low vision are considering self-employment as a way of avoiding instability of the labour market and employer attitudes. Our members argue that self-employment should be considered a highly desirable outcome, but isn't well-supported by current DES or EAF system settings. It shouldn't be assumed that people with the initiative to start their own business also have the capacity to achieve this unassisted. Self-employment, with work hours set at a DES participant's assessed benchmark, should be added as an outcome pathway in the new model.

### **How do we best tailor mutual obligation requirements to increase the likelihood of people with disability finding work in the future?**

Mutual obligation requirements for DES should be informed by an understanding that many people are struggling to find work not because of their own lack of motivation but because of systemic obstacles. Many people who are blind or have low vision present to DES out of desperation, having already been seeking a job for some time.

Mutual obligations will not be effective if providers are held responsible for enforcing them. Providers are informed by their own biases and needs, which could lead to either overly lax or excessive recording of breaches. Mutual obligation requirements should be enforced by an impartial body such as Centrelink in the new DES model.

### **How can funding arrangements incentivise good work outcomes?**

One of the ways providers could be encouraged to deliver work outcomes that recognise the need for career progression is bonuses for providers who are able to help clients find a job that is:

- A. In the field in which they received their tertiary qualification, and/or
- B. In a field where there are recognised skills shortages.

The following additional outcome pathways should also be incentivised:

- Self-employment
- Long term voluntary work placement
- Supported employment.

These outcomes are equally valid and may be ideal for clients in a variety of circumstances, but providers are currently discouraged from helping clients achieve them because they will not impact their star ratings or income.

### **How do we drive high quality services and supports?**

As previously noted, the key to effective supports for people who are blind or have low vision is specialist providers and staff who have a strong understanding of their needs and are well-prepared to help potential employers recognise their capacities. Encouraging specialist providers to enter the sector will be a vital step toward delivering the outcomes we hope for.

As an interim measure, information about specific, low prevalence cohorts such as people who are blind or have low vision should be provided as training resources to both assessors and to providers via the provider portal and learning centre. Vision 2020 Australia's members would be happy to assist in developing these resources.

Current guidelines for providers and workers seem to focus on compliance rather than innovation. As a key example, under current requirements, 6 contacts are required over a 12-week period, but 2 of these contacts must also occur every month. If these very specific conditions aren't met, the entire fee for that 12-week period is recovered, rather than the portion for the contact that was missed.

To encourage innovative providers and attract and motivate quality staff, the new support model should:

1. Ensure fees are not recovered as a result of clerical errors on the part of providers, which should instead be reflected in performance reviews,
2. Create significantly simpler guidelines for providers and workers which recognise that people with disability have complex lives, and allow for slightly more flexibility in contact times,
3. Clearly indicate to providers when changes have been made to guidelines, so that staff time is not used frequently checking for updates.

Vision 2020 Australia's members are concerned by the highly ambitious timeline of July 2023 to create and implement a new DES model. We call for a 2 step approach to be taken.

People who are blind or have low vision are struggling to find fulfilling work, which is negatively impacting their financial security and mental health. It is vital that these people are not arbitrarily cut off from any support. The first step, which should be considered an urgent priority, must be the immediate removal of unnecessary access barriers, including:



- The recently introduced eligibility criteria that excludes people whose benchmarks are below 8 or above 30 hours per week;
- The exclusion of people over the age of 65, who are often still seeking employment, and;
- The exclusion of students, who might benefit from part-time work alongside their study.

The second step will be to develop and concurrently run the new model alongside the existing model to enable flaws and issues to be addressed before a final changeover is made. We would note, for example, that the New Employment Services Trial (NEST) has run alongside Jobactive since 2019, providing time to recognise flaws in the system before it rolls out nationally in July 2022.

Tendering a new model that has been proven to work well will give providers confidence to continue delivery, and will encourage new and more specialist providers to enter the market. It will also ensure the new model is informed by final recommendations from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, which is considering Disability Employment Services in hearings early this year.

### **How do we measure success?**

The success of employment supports is proven by:

- An increase in employment rates of people with disabilities generally, in comparison to people in the general population.
- An increase in the employment rate of people who are blind or have low vision specifically, including part and full-time employment rates, and compared to both the wider population of people with disabilities and the general population.
- Improved employer confidence in hiring people who are blind or have low vision.
- A larger number of people who are blind or have low vision in executive and leadership positions and in self-employment.

In response to feedback from the sector, the National Disability Insurance Agency (NDIA) has recognised the complexity of ensuring systems designed to cater to a wide variety of needs work well for low prevalence cohorts. In order to help measure their own progress, they recently released a [report on Participants with Sensory Disabilities](#), including blindness and low vision as well as hearing loss. DSS should adopt this approach and regularly report on employment of DES participants with sensory disabilities. This report would provide information to the sector about:

- The number of DES providers over time who claim to specialise in blindness and low vision.
- The number of people who were blind or had low vision who received DES over a given period, and.
- The number of those people who achieved employment outcomes as a result of supports from DES.

This report would assist the blindness and low vision sector in understanding how DES improves employment outcomes for people who are blind or have low vision in the future.

## About Vision 2020 Australia

Vision 2020 Australia is the national peak body for the eye health and vision care sector. Working with and representing almost 50 member organisations, we focus on supporting policy and funding changes to prevent avoidable blindness, enhance eye care delivery and better meet the needs of people who are blind or living with low vision.

Our members span a wide range of areas and engage in local and global eye health and vision care, health promotion, low vision support, vision rehabilitation, eye research, professional assistance, and community support. This means that the work we do in developing sector-supported policy and advice brings a diverse range of expertise and perspectives to bear, and that the perspectives and experiences of both service users and service providers are at the heart of our work.

Avoidable blindness and vision loss in Australia, and our region, can be prevented and treated by working in partnership across government, non-government, private and community sectors. People of all ages who are blind or vision impaired will benefit from these partnerships, with improved access to services that support their independence and community participation.

For further information about this submission, please contact Vision 2020 Australia via email, [policy@vision2020australia.org.au](mailto:policy@vision2020australia.org.au)