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Physical Disability Council of Australia Ltd (PDCA)

Response February 2008

A discussion paper on Australia's workforce participation issues

PDCA is the national peak organisation representing the interests and views of people with physical disability across Australia. We are proud of our reputation of being an ethical and professional organisation run by and for people with physical disabilities in Australia.

RECOMMENDATIONS

Early Interventions PDCA believes that a work ethic must be instilled in all people at the school level, and whilst this is not to overtake education, it must become an everyday practice that all students, including those with a disability are introduced to the concept of working, and follow through with the opportunity for skills training introduced within the final years of schooling.

Following school, Vocational Education opportunities must be increased for all people. Today in Australia there are fewer and fewer school leavers taking up Cadetships and Apprenticeships than

ever before, yet these are essential to our future as a nation.

People with disability are more than capable of undertaking Cadetships and Apprenticeships, yet this is seldom an opportunity that is offered.

Attitudes pervade our society that people with disability are 'useless, unemployable, unproductive, untrainable, and others. This is simply not true!. Australia needs a whole attitude change toward all of its citizens, and especially toward those with a disability.

Job Seekers with Higher levels of disadvantage The previous labor government initiated the 'More Intensive Flexible Services' (MIFS) in Queensland, as a pilot programme. Despite this programme being successful in its ability to place and support those with higher levels of disadvantage, the Howard government scrapped this and other programmes that worked.

PDCA believes that MIFS or programmes like it, need to be implemented and work in conjunction with School leavers and those who have more support needs in order to work.

Performance Management Principles PDCA believes that disability employment services place too much emphasis on getting short term outcomes for funding reasons, are becoming larger and therefore less in touch with their client base and place less importance on sustainability in employment, job satisfaction and career advancement.

Time and money spent on administration In addition to the recommendation above, PDCA believes that Administration takes the largest share of grant funds in any employment services. This was evidence by the writer who worked in such an organisation where funds were channelled into overall rent and administration of an existing organisation. There seems to be no goodwill within larger organisations that this is a service offered within the community, but rather these have become businesses in their own right and chasing the funds.

PDCA recommends that a set figure be allocated for administration in any service organisation, and all organisations are paid this rate as a starting point.

Welfare to Work - PDCA believes the Policy of Welfare to Work needs to be reviewed with emphasis and concentration on supporting and encouraging people with disability into work by addressing the barriers that prevent their employment.

Breaching- PDCA supports a review of the Breaching Policies currently in place, with independent review members and independent outcomes

Disability Allowance to Address Cost of Disability - PDCA recommends that an inclusive Disability Allowance needs to be initiated using a whole of life approach to the cost of disability. This should not be means tested but based on meeting some of the costs associated with a disability, including those entering or remaining in the workforce.. This Allowance should be available to all people with disability who have costs related to their disability regardless of their employment status.

Mobility Allowance -PDCA recommends that the Mobility Allowance of \$100 be paid to all people with disabilities who cannot travel on public transport or who are in rural and remote areas of Australia. This should also be available to those who undertake significant training or volunteer work. There should be no distinction between those who are already in employment as transport unavailability and costs are just as significant.

Newstart Payment -PDCA recommends that the Newstart Payment be equivalent to all other benefits, distinguished only by whether the person is single, part of a couple, and/or has children. Allowances should be paid on top of the base rate of benefit.

Current Programmes - PDCA recommends that the funds for programmes such as personal support be allocated to an independent organisation, which distributes the funds according to need, and not to Employment Services who sometimes use these funds to support 'the cream' clients, when others have more obvious need.

Personal Support - PDCA recommends that these funds be allocated to an independent organisation, which distributes the funds according to need, and not to Employment Services who often use these funds to support 'the cream' clients, when others have more obvious need.

Opportunities - PDCA recommends that a complete review of all programmes and subsidy schemes be undertaken with the assistance of a Ministerial Advisory Council.

Supported Wages - PDCA recommends that any Advisory Council also consider a review of Supported Wages within their portfolio.

Vocational Education and Training - PDCA recommends that the proposed Advisory Group also undertake research in the area of VET to determine what pre vocational training is available to people with disabilities throughout the community and where the shortfalls are, including financial disincentives. This research should also address the inadequate VET programmes in rural and remote areas where many people could work from home using modern communication technology.

PES Allowance - PDCA believes that people with disabilities entering into VET programmes whether in receipt of Newstart, Austudy or DSP should be eligible for the PES allowance in order to assist in the costs associated with studying.

Austudy and Newstart - PDCA also recommends that Austudy and Newstart should be paid at the same rate as other benefits, and that all benefits be equivalent, distinguished only by single or couples rate or whether people have children. Allowances such as rent allowance, Child allowance, PES and other benefits should be payable on top of the basic rate equivalent to all people.

Independent Austudy - PDCA further recommends that the eligibility for independent Austudy be reduced to 18 years instead of the current 25 years. Once again it is absurd to assume that because a person may remain at home, their costs are not as great, nor should it be assumed that the parent still has financial responsibility.

Mobility Allowance - PDCA also recommends that the Mobility Allowance of \$100 be paid to all people with disabilities who cannot travel on public transport or who are in rural and remote areas of Australia. This should also be available to those who undertake significant training or volunteer work. There should be no distinction between those under Welfare Reform and those who are already in employment as costs are just as significant and real, and it is absurd for any government to think otherwise.

Newstart Payment - PDCA recommends that the Newstart Payment be equivalent to all other benefits, distinguished only by whether the person is single, part of a couple, and/or has children. Allowances should be paid on top of the base rate of benefit.

Support hours and workplace support - PDCA recommends that any future CSTDA address the shortfall in support hours and whether support hours are complimentary to employment.

Workplace equipment provision - PDCA recommends any equipment allocated for support reasons should always go with the individual if changing employment and not remain with the previous employer.

Transport and Access to Premises - PDCA recommends that the Australian Labor Government have significant input into the DDA Public Transport Standard and the DDA Access to Premises Standard in order to ensure that public transport and physical access in Australia is equitable to all citizens.

Transport Limitations under the DDA - PDCA recommends that the Rudd Government undertake to address the limitations of disability transport subsidies in states and territories (Within State and Territory Agreements) to encourage consistency in subsidies between states.

Taxation Laws - PDCA recommends that Taxation laws be amended to allow those in employment to offset the additional costs of essential equipment such as wheelchairs, home modifications, and vehicles etc to assist with some of these costs.

Childcare - PDCA supports wage increases for childcare workers in order to pay equitable wages to ensure the right people are available for our children and to entice people to train as child care workers, including those with a disability.

Stay at home parents - PDCA believes that staying at home with children is the right of any parent, and those parents should also be eligible for childcare although a priority should be for those parents in who are in the workforce first. This equally applies to people with disability as parents.

Public School Childcare placement - PDCA supports the recommendation that childcare places be located within the public school environments in order to prevent trauma associated with transitions from childcare to school. This will provide a much more interactive process and the transition would be understood and smooth and access limitations for those children with disabilities will be minimised.

Health issues -PDCA recommends that a review be undertaken to look at Health Care Cards programme and how best to support people with disabilities in the long term workforce who have significant medical costs.

Bulk Billing - PDCA also recommends the review of Bulk Billing by Doctors so that people on low wages and/or who have high medical costs are treated fairly and equitably and not disadvantaged by their medical costs.

Disability Awareness campaign - PDCA recommends using the information and experience of other countries in order to highlight the benefits of employing people with disabilities. In particular the examples from the United Kingdom and to highlight the spending capacity and lifestyle changes that result from being employed.

Public Awareness - PDCA recommends the initiation of a collective public awareness campaign using all levels of media and resources, using people with disabilities as trainers (paid) to deliver the message across Australia including government departments (as part of their Action Plans) that people with disabilities are part of society too.

Ministerial Advisory Group - PDCA has for some time, recommended setting up a Ministerial Advisory Group to work on a national strategy in much the same way as the former Education, Bridging Pathways National Strategy. We therefore support the Australian Government in setting up a Ministerial Advisory Group to oversee this important issue.

Partners to include:

- 1.PDCA
- 2.HREOC
- 3.Employers Making a Difference (EMAD)
- 4.Australian Federation of Disability Organisations (AFDO)
- 5.Australian Competitive Employment (ACE)
- 6.NDS (representing Employment Services)
- 7.Diversity @ work
- 8.Australian National Training Authority (or equivalent) representative
- 9.Government representatives - as Secretariat with input (but not overloaded with government representatives.)

FaHCSIA

DEEWR

Centrelink

The Physical Disability Council of Australia Ltd (PDCA) would like to thank the Hon. Brendan O'Connor, Minister for Employment Participation, for the opportunity to present this submission.

PDCA would like to take this opportunity to provide the paper submitted to Senator Penny Wong 'Reward for Effort: Meeting the Participation Challenge' provided to Senator Wong and the Australian Labor Party in February last year (2007) with 2008 updates.

The comment and feedback on this issue of great importance to our members and people with physical disability in general, reflects the beliefs of our Board and our members. . In essence our comments are directly related to people with disabilities only..

Our Mission Statement, Values and Goals:

PDCA exists to convince governments to mandate laws and rules that enables the full participation of people with physical disability.

Values

PDCA's actions are based on:

1. The personal experience of disability
2. Information from across Australia
3. A Social Model of Disability
4. A powerful belief in the capacities of people with physical disabilities
5. A determination to effect and initiate change through monitoring, proactivity and creativity

Goals

PDCA's goals are to

1. educate, advise, resource and respond to government
2. attempt to keep decision makers honest
3. effect and initiate change
4. be a united voice
5. be a grass roots organisation
6. be a watchdog
7. be proactive and creative
8. to voice that disability is normal and therefore we are equal.

The People we represent:

In the 2003 Australian Bureau of Statistics (ABS) Survey of Disability, Ageing and Carers (SDAC) one in five people in Australia (3,958,300 or 20.0%) had a reported disability. This rate was much the same for males (19.8%) and females (20.1%). Disability was defined as any limitation, restriction or impairment, which has lasted, or is likely to last, for at least six months and restricts everyday activities. Examples range from hearing loss which requires the use of a hearing aid, to difficulty dressing due to arthritis, to advanced dementia requiring constant help and supervision...

Of persons aged 15–64 years with a reported disability living in households, 30% had completed year 12 and 13% had completed a bachelor degree or higher. Of those with no disability the respective proportions were 49% and 20%. The labour force participation rate of persons with a

disability was 53% and the unemployment rate was 8.6%. Corresponding rates for those without a disability were 81% and 5.0%. The median gross personal income per week of persons aged 15–64 years with a reported disability living in households was \$255, compared to \$501 for those without a disability. Median gross personal income per week decreased with increasing severity of disability. It was lowest (\$200 per week) for those with a profound core-activity limitation.¹

Self care, mobility and communication are fundamentally important activities underlying all aspects of everyday life. Most people with a disability (78%, or 15% of the total population) were restricted in one or more of these core activities. Depending on the level of assistance needed or difficulty experienced, restriction in core activities was profound (3% of the total population), severe (3%), moderate (4%) or mild (6%)...

In 2003, People with disability had a lower labour force participation rate (53%) than those without a disability (81%) and those with a profound or severe core-activity limitation had an even lower participation rate (15%).³

Regardless of individual differences in disability, it can be said with confidence that people with physical disability, particularly those with significant mobility handicaps:

1. have great difficulty gaining access to public and private buildings because of physical barriers such as steps, steepness of site and lack of accessible parking, lack of lifts to 2nd floor and above, lack of accessible toilets, etc
2. face greater costs than other people because of their disability such as specific and essential equipment, modifications to vehicles, household appliances, modifications to housing including internal and external, home maintenance including gardening, lawns and window cleaning, transport, personal and health care including pharmaceuticals and items not included on the PBS, and managing a household and family who in many cases generally cannot access public transport and are reliant on accessible taxis, with varying levels of subsidy throughout Australia, or on private vehicles, which have been purchased to be able to carry a person using a wheelchair, therefore is often more costly
3. face significant discrimination in finding a job and obtaining promotional opportunities, despite the avenues for redress through disability discrimination legislation. The Australian Public Service does not employ people with disability in the same numbers as it once did. Job centres are rarely accessible with accessible toilets and other staff/student facilities. Many of the staff in job centres have not been exposed to people with disability, understand the DDA or had any disability awareness training
4. have lower incomes/education than their age peers due to greater difficulties in getting employment and in achieving promotion This is borne out by the decline in Australian Public Service employees who have a disability.
5. have fluctuating income if their impairment is associated with medical conditions leading to episodic periods of hospitalisation and/or absence from work. (Such people include people with spinal cord injury, multiple sclerosis, muscular dystrophy, polio, cerebral palsy, arthritis and mental illness etc).
6. Lack work skills often due to low expectations and lack of self esteem
7. DSP (and now Newstart) recipients often have no formal education with lack of schooling

1 ABS 2003 Australian Bureau of Statistics (ABS) Survey of Disability, Ageing and Carers (SDAC)

and training opportunities because of:

- little or no access to many premises
- lack of appropriate and affordable transport
- Cost of a Disability

8. There is a mismatch between available skills and those in demand

PDCA believes that for people with disabilities, employment encompasses more than securing a position in employment and that governments and community need to be aware that support mechanisms must be in place before employment and equality in employment can happen.

Many people with disabilities do want to work, either full time or part time, and any efforts to address this complex issue are welcomed. Despite numerous opportunities for input and comments from people with disabilities across Australia on the issue of employment, people with disabilities and their say has been largely ignored by previous governments.

The stated objective of moving people from welfare to work as stated by the previous government particularly in 'Welfare to Work' policy. represented a triumph of rhetoric over reality. This relied on a simplistic analysis of the operation of the labour market, rather than determining what is needed in order to get people into meaningful work with meaningful wages and futures.

PDCA believes that there has been many missed opportunities for innovative and flexible employment options and partnerships to address the issue of employment of people with disabilities. We also agree that the rhetoric is often so different from the reality that it can be near impossible to expect many people with disabilities to work unless there are sufficient changes within our society as we have stated elsewhere in this document.

We therefore welcome the Rudd Government initiative in attempting to address some of the inequalities in employment including addressing the barriers and issues which impact on the employment of people with disabilities in Australia. These can and do involve the following:

Access – addressing the barriers that prevent employment of people with disability, such as physical access, communication access, information access, access to staff facilities, access to appropriate technology for work purposes, and access to work related support and equipment;

Attitudes of Job Centre, Job Network, and general Employment Service staff, potential employers and staff, which includes discrimination and reflects the day to day reality for people with disability in Australia.

Tertiary and Vocational education.

Any discussion of employment opportunities must include not only training but education/retraining/information etc. Often people with disabilities miss out on their early education for a number of reasons, but this can be rectified by mature age studies, distance education and part time studies. However many people with disabilities do not know or have access to distance education, mature age studies or the support available within the university or TAFE environments. Many of the former programmes that provided such support are no longer in place.

Employment must be included as a whole of government priority by any Commonwealth Government. The issue of employment and economic participation has been a priority in some areas of government such as Family, Housing and Community Services, and DEEWR and significant

resources have been poured into Welfare Reform in past years as well as other initiatives designed to increase the participation of people with disability in paid employment. Unfortunately, these initiatives are failing and neither the Commonwealth Government nor the *Disability Discrimination Act (1992)* have been able to rectify this situation.

Self Employment. How to support people who run their own small/micro businesses or in other ways of being self-employed is an issue that also needs to be addressed as often this is a missed opportunity. So too is the option of working from home, which is one way of addressing some of the barriers to inaccessible employment places.

Evaluation of existing programmes. Any evaluation needs to look at how and why efforts to address this issue through millions of dollars in programmes, have failed consistently over the past 11 years..

Diversity is not covered when addressing employment issues and it is an important aspect that would help to ensure that people with disability from all backgrounds are equal to other members of society. This includes indigenous Australians and those from Non English Speaking Countries, whose English and customs are different to those of Australians.

Addressing the Barriers

1 Government Departments

PDCA believes there is a disjunction between the Departments and stresses that this has become far more complex over the past 11 years (since the inception of PDCA) instead of what should be a streamlined system.

This is not necessarily the failure of the Departments who are at the whim of government changes. An example of this in recent times is the Welfare Reform and Welfare to Work, which are significant examples where people with disabilities have been the pawns in an unworkable system, causing more despair and trauma to an already vulnerable group of people.

The desire of disability employment services to have more and more funds whilst at the same time, not producing long standing and suitable employment outcomes, cannot be allowed to continue. At the heart of these issues are people with disability who constantly miss out or are inappropriately placed or set up to fail. The voices of these services are loud and constant and people with disability, already vulnerable, cannot compete in informing governments of what is needed to succeed.

2 Newstart Versus DSP

Newstart was never designed in the first instance to be a permanent benefit, but rather as a payment to encourage those temporarily out of work. People with disabilities being placed on Newstart are therefore being penalised more than other benefit recipients by having a 15 hour assessment capacity implemented. This needs immediate review and perhaps a compromise needs to be found for those with the ability to work.

The Disability Support Pension(DSP) is more favourable and equitable for those with a disability. Newstart is not. There is no incentive to find work when financial support is diminished. Rather this would have a tendency to depress those with already low self esteem and little confidence and those with few skills will no

longer have the opportunity to gain skills in an inclusive way. This is a punitive measure designed to manipulate people into work, without support and by all accounts is not working.

PDCA believes the whole Welfare to Work needs to be reviewed with concentration on supporting and encouraging people into work by addressing the barriers that prevent employment.

These will be outlined further in this document.

3 Compliance

PDCA supports any compliance requirements as long as they are fair and equitable and we believe that mutual obligation should be a two way partnership between government and people with disability in this instance. To date, we have seen little evidence of mutual obligation on the part of government in providing support and appropriate outcomes where needed, but much has been seen in the way of supporting employment organisations to become larger and richer.

4 Penalties

PDCA does not support the fact that there is no right of appeal for the 8 week non payment penalty as this can often be one persons idea of misconduct based on misinformation or lack of information. We believe there needs to be a fair and independent right of appeal in all instances.

PDCA supports a Breaching Review Taskforce with independent members and independent outcomes. This could also become one of the tasks of the Ministerial Advisory Group.

5 Australian Public Service

The Australian Bureau of Statistics, shows that people with disability employed by Australian Public Service (APS) has decreased by 20% since 1997. This is a disturbing decline in employment support for people with disability who are being urged to go out or return to work on the one hand, but discouraged from working in the one place that purports to be an Equal Opportunity Employer - the Australian Government Public Service.

To date all we have seen is a public launch of a strategy, whilst the figures of employment of people with disability have not significantly increased.

PDCA recommends that a significant public awareness campaign be undertaken by the APS to encourage the employment of people with disabilities into the APS, with Cadetships and Apprenticeships being encouraged.

Opportunities & Support

1 Programmes

The programmes Work Based Personal Assistance (WBPA) and the Workplace Modifications and Subsidised Wages schemes are designed to assist and support

people with disabilities, but do they reflect the reality? Also consider what mechanisms are used to decide on eligibility for these programmes and who is granted the management of funds.

For instance if an Employment Service is granted the funds, and already receives government funding, what guarantee is there that the funds for Work Based Personal Support are spent in the right place or on the right person?

PDCA recommends that these funds be allocated to an independent organisation, which distributes the funds according to need, and not to Employment Services who often use these funds to support 'the cream' clients, when others have more obvious and longer term need.

Colleagues providing personal care to co-workers is inappropriate and what this does to the relationship between colleagues is considerable. One dependent on the other for vital support in the workplace is not equity among work colleagues. Personal support should be independent of co-workers and not part of any workplace relationships.

2 Workplace subsidies

PDCA believes there needs to be a complete review and an awareness campaign of subsidies available to assist in employing a person with a disability, such as Workplace Modifications and Wage Subsidies in order to ensure equity to all those that require this support.

PDCA recommends that a complete review of all programmes and subsidy schemes be reviewed within the purview of the Ministerial Advisory Group.

3 Appropriate Wages

People with disabilities are often in low paid positions with no provision for promotion or increased wages and inappropriate conditions, including Business Services where people with disabilities are often underpaid

PDCA recommends that any Advisory Group also consider these issues in their portfolio.

4 Vocational Education and Training

Over the past few years many VET opportunities have been removed or lost including the Australian National Training Authority (ANTA) and therefore VET for people with a disability has had to take a backseat or not exist at all. This includes Skillshare and Job Club programmes which went a long way in helping to maximise skills and find employment and was targeted at individuals and their actual needs.

In order to support a '*skills first approach*', there must first be the opportunities to train or upgrade skills, and as will be discussed here, these have diminished substantially over the past 11 years.

PDCA believes that *courses that can be undertaken on Newstart are entry-level type courses, generally not beyond a year in length. These do not of themselves provide any actual workplace qualification that a person would need to become employed, and are often simply 'holding places' or at worst designed for an outcome of some type.*

People with disabilities are already at a disadvantage on Newstart and would be even more

disadvantaged on Austudy if studying longer were an option. It is absurd for any government to assume that costs of living are less because a person is studying. In fact in many cases, it is quite the opposite.

What is needed therefore is to invite case studies from the community to determine the shortfalls of VET opportunities and where the greatest problems exist in order to address these. PDCA would be more than willing to assist in this process through our membership and Board.

PDCA also believes that a review of the lack of community based vocational training and support is needed, such as the former Skillshare and Job Clubs which were valuable in supporting and training people into employment especially in rural and remote areas and suburbs of high unemployment

PDCA believes that 'Parents and people with a disability who receive pension-type payments (such as DSP and Parenting Payment Single) should be able to access the Pensioner Education Supplement, a payment that provides extra assistance to aid study.

However, if people with disabilities are placed on Newstart, in order to seek employment, the PES should no longer be available to them.

PDCA recommends that the proposed Advisory Group also undertake research in the area of VET to determine what pre vocational training is available to people with disabilities throughout the community and where the shortfalls are, including financial disincentives. This research should also address the inadequate VET programmes in rural and remote areas where many people could work from home using modern communication technology.

PDCA believes that people with disabilities entering into VET programmes whether in receipt of Newstart, Austudy or DSP should be eligible for the PES allowance in order to assist in the costs associated with studying.

PDCA also recommends that Austudy and Newstart should be paid at the same rate as other benefits, and that all benefits should be equivalent, distinguished only by single or couples rate or whether people have children. Allowances such as rent allowance, Child allowance, PES and other benefits should be payable on top of the basic rate equivalent to all people.

PDCA further recommends that the eligibility for independent Austudy be reduced to 18 years instead of the current 25 years. Once again it is absurd to assume that because a person may remain at home, their costs are not as great, nor should it be assumed that the parent still has financial responsibility.

The barriers

1 The Cost of Disability

The issue of Cost of Disability and costs of working need to be addressed in the near future. Whether people with disability consider it is financially viable (or not) to be in employment, as opposed to being a recipient of a Disability Support Pension or Newstart is another contentious issue. Such issues related to costs should include the cost of transport, clothing, equipment, medical costs without a Health Care Card etc.

The cost of having a disability is recognised by many governments in the western

world with a Disability Allowance paid to people with disabilities in recognition of these costs, which are outside of the usual lifestyle costs. Australia does not.

PDCA believes that there is a significant cost of having a disability and this is evidenced in research undertaken by Dr. Jack Frisch in 2000 entitled Cost Analysis: Towards a Disability Allowance, on behalf of PDCA. This research is about to be updated this year and we will be happy to share the findings with government when completed.

In addition those who are moved from DSP to Newstart are at an even greater disadvantage due to the cost of their disability and therefore may never get out of the Poverty Trap.

PDCA recommends that an inclusive Disability Allowance needs to be initiated using a whole of life approach to the cost of disability. This should not be means tested but based on meeting some of the costs associated with a disability. This Allowance should be available to those not in employment and to those who are currently employed.

PDCA also recommends that the Mobility Allowance of \$100 be paid to all people with disabilities who cannot travel on public transport or who are in rural and remote areas of Australia. This should also be available to those who undertake significant training or volunteer work. There should be no distinction between those under Welfare Reform and those who are already in employment as costs are just as significant.

PDCA recommends that the Newstart Payment be equivalent to all other benefits, distinguished only by whether the person is single, part of a couple, and/or has children. Allowances should be paid on top of the base rate of benefit.

2 Personal and Work Support

Addressing employment barriers needs to consider whether support programmes such as Personal Support Programmes or Attendant Care or Personal Lifestyle support packages meet the extended needs of people working (for instance are these hours transferable to the workplace or for the home area only?)

Often people who wish to enter or return to the workforce have inadequate personal care hours which assist with rising from bed showering, dressing for work, making lunches, travelling to work, (many people with physical disability cannot do these tasks unaided), This shortfall is an unmet need in many instances across Australia and should be significantly addressed under any CSTD Agreement so that both Federal and State Governments work co-operatively together to address the needs.

PDCA recommends that any future CSTD address the shortfall in support hours and whether support hours are complimentary to employment.

PDCA recommends any equipment allocated for support reasons should always go with the individual if changing employment and not remain with the previous employer.

3 Transport

Current Public Transport is not completely accessible or consistent across Australia, resulting in significant taxi or car costs for travel to employment. This

is increased in rural and remote areas or areas where taxis and public transport is at a minimum.

PDCA recommends that the government have significant input into DDA Public Transport, in order to ensure that public transport in Australia becomes fully accessible to all citizens.

PDCA recommends that the government undertake to address the limitations of disability transport subsidies in states and territories (Within State and Territory Agreements) to encourage consistency in subsidies between states.

4 Access to Premises

PDCA believes that the Federal Government needs to address the Australian Building Codes Board (ABCB) - specifically the Access to Premises Standard Draft connected to the DDA (1992) which has been before government for over 2 years now.

This piece of legislation is vital to the successful employment of people with disabilities as lift access to 2nd and 3rd stories in small businesses is essential for employment opportunities and is a double advantage in the provision of access to an Ageing Australia as well as benefitting parents with small children and prams, and of OH&S in deliveries of supplies and equipment.

In addition any future government should adopt Universal Access design principles in order to include all of its citizens, including parents with prams, those with temporary or permanent disabilities and the ageing sector. Many good examples of Universal Design are available (especially in the UK) but without government support this will never happen,

Recommend that Federal Government encourage and support an Access to Premises Standard that is fully inclusive to people with disabilities in all aspects and ensure its implementation in the very near future.

5 Taxation

PDCA supports the option:

One option is to increase the amount of income that can be earned by a Newstart recipient before the benefit commences to be withdrawn - the "free area".

The application of the pensioner income free area to Newstart would increase the amount of income that could be earned before withdrawal of benefit commences, to \$64 p.w. (single) and \$57 pw (partnered), from its current level of \$31 p.w. Whilst this option would provide some marginal benefit to Newstart recipients, the steeper withdrawal rates applying to this payment will continue to impose high effective marginal tax rates as the benefit is withdrawn.⁸⁹

PDCA also recommends that Taxation laws be amended to allow those in employment to offset the costs of essential equipment such as wheelchairs, home modifications, and vehicles etc to assist with some of these costs.

6 Childcare

Many people with disabilities are parents too, and we support the position on childcare in the discussion paper provided by Senator Wong in 2007 -p 74, including:

- Childcare cost increases have risen more than 3 times, which add to the cost of disability as many people require respite from their child with a disability or children from parents with a disability.
- Childcare is good for children, particularly from a social and education perspective and children with disabilities are no exception. We believe that good childcare is an economic investment in children of the future
- We support wage increases for childcare workers in order to pay equitable wages to ensure the right people are available for our children and to entice people to train as child care workers
- Parents who stay at home should also be entitled to childcare places and subsidies
- PDCA supports the recommendation that childcare places be located within the public school environments in order to prevent trauma associated with transitions from childcare to school. This will provide a much more interactive process and the transition would be understood and smooth.

7 Disability Employment Services

PDCA believes that Disability Employment Services need additional expectations and outcomes placed on them when receiving public monies, including assurance of equity and inclusion of all people with disabilities, not just Quality Assurance which regulates the organisation but not the provision of service.

For instance:

- The support for retention of jobs is not enough, instead many services focus on short term outcomes to fulfill contract requirements for that period, often resulting in a 13 week outcome or at most a 26 week outcome which then fails.,
- contracts and tenders are often awarded without checking that services comply with the DDA and access to premises requirements, resulting in many services not being physically accessible to some
- There are not enough clear assessments and expectations of services, even with the DEN Star ratings
- Not enough training opportunities organised by employment services, which are piecemeal at best
- no clear opportunities or promotion of what could be achieved
- too much picking the cream of clients for easy outcomes
- too much spent on administration and staff resources and not enough on the clients themselves and their needs
- too much staff training and incentives and none for clients, such as conferences
- not enough say from clients in their placement and clients often being coerced into inappropriate positions such as enclaves because there is little else on offer
- not enough consistency across services

PDCA supports Case Based Funding which is targeted at individual clients and their needs rather than block funding which has not worked to the benefit of people with disabilities, but has ensured that many of the employment services have become very large and powerful organisations.

8 Health Issues

Many people with a disability suffer ongoing health issues that need constant medication and treatment, which can be costly and prohibit working without a Health Care Card to defray some of the costs. As part of a working nation, people who experience such costs should be able to keep a Health Care Card in order to defray these costs.

PDCA recommends that a review be undertaken to look at Health Care Cards programme and how best to support people with disabilities in the long term workforce who have significant medical costs.

PDCA also recommends the review of Bulk Billing by Doctors so that people on low wages and/or who have high medical costs are treated fairly and equitably and not disadvantaged by their medical costs.

9 Public Awareness

Awareness raising campaigns should be implemented, showing the benefits of employing people with a disability. The UK has significant information on these benefits including the impact of contributing to communities (also by volunteer efforts) by people with disabilities

PDCA recommends using the information and experience of other countries in order to highlight the benefits of employment people with disabilities, in particular the United Kingdom and to highlight the spending capacity and lifestyle changes from being employed.

PDCA recommends the initiation of a collective public awareness campaign using all levels of media and resources, using people with disabilities as trainers (paid) to deliver the message across Australia including government departments (as part of their Action Plans) that people with disabilities are part of society too.

Equal Employment

EEO in Australia

PDCA believes that the knowledge about the real needs of people with disabilities by employment officers and/or human resource personnel in training institutions such as Universities, TAFE's and other Management Training institutions is insufficient, and that discriminatory policies and actions are happening because of this lack of knowledge. In addition, there are far too few people with disability taking up these roles as a career opportunity.

What is required is to:

- Promote flexibility in work practices and work hours such as working from home, working part time, flexibility during school holidays, working on weekends
- Discuss and advertise discrimination in the workplace and the DDA in any Awareness campaigns
- Promote Equal Opportunity throughout Australia to build a nation of inclusion rather than exclusion.
- Invite tenders to provide Awareness Training to government departments (as part of Action Plans under the DDA) and to be available (at a cost) for employer organisations such as Chamber of Commerce and other business associations. This training should be undertaken by collectives of people

with disabilities who are experienced trainers and NOT by private providers.

National Advisory Group

PDCA has for some time, recommended setting up a National Advisory Group to work on a national strategy in much the same way as the Education document 'Bridging Pathways - A National Strategy'. We therefore support an Advisory Group be set up to oversee this important issue.

This advisory group could investigate all aspects of the employment process for people with disabilities within a non political Advisory group.

The focus of the Advisory Group should be to investigate and recommend (amongst other issues) innovative practices of employment, existing employment services and supports as well as researching what practical and active assistance is needed to assist people with disabilities to become employed. Vocational Education and Tertiary Opportunities should be included in this brief.

The Advisory Group would also oversee:

- Disability Awareness campaigns directed specifically at potential employers
- Human Resources and Advertising processes used to secure staff with disabilities including Guidelines for the whole recruitment process
- EEO Practices within Australia and overseas
- Apprenticeships and cadetships and other opportunities for people with disabilities
- Education and training opportunities and shortfalls in the community
- Equipment, where and how to get it and who is eligible to obtain it (the individual with a disability or the employer).
- Supervise provision and maintenance of Supported Wages Programme and ensure equitable wages for people with disabilities in open employment
- Recommend appropriate conditions of employment (such as removing any inappropriate Industrial Reforms currently in place)
- Promotion and training opportunities of employers

Partners in a National Advisory Committee should include:

1. Physical Disability Council of Australia Ltd (PDCA)
2. HREOC
3. Employers Making a Difference (EMAD)
4. Australian Federation of Disability Organisations (AFDO)
5. Australian Competitive Employment (ACE)
6. ACROD
7. ACE
8. Diversity @ work
9. Australian National Training Authority (or equivalent) representative
10. Government representatives - as Secretariat with input
 - FaCSIA
 - DETYA
 - Centrelink
 - Human Services

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