

Mr David Thodey AO  
Chair, Independent Review Panel  
Department of Prime Minister and Cabinet  
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Dear Mr Thodey

Vision 2020 Australia welcomes the opportunity to provide a brief submission to the *Independent Review of the Australian Public Service*.

As the national peak body for the eye health and vision care sector, Vision 2020 Australia represents around 50 member organisations involved in local and global eye health and vision care, health promotion, low vision support, vision rehabilitation, eye research, professional assistance and community support.

Together, we advocate for policy and legislative enhancements to provide the optimal level of care and support for people who are blind or have low vision and to maximise opportunities for participation in all aspects of daily life, including meaningful employment.

Noting the Panel is seeking to make practical recommendations within the scope of the capability, culture and operating model of the Australian Public Service (APS), Vision 2020 Australia makes this submission in relation to the term of reference **Acquiring and maintaining the necessary skills and expertise to fulfil the APS' responsibilities**, and wishes to comment on the employment of people with disability in the APS.

People with disability represent only 3.6 per cent of the APS workforce, far below the roughly 18 per cent of Australians who identify as having a disability. While the APS *As One: Disability Employment Strategy 2016-19* sets out a number of action areas for meaningful change to increase the representation of employees with a disability across the APS, the strategy does not include concrete targets for representation. It is recommended that any successor goals and actions include employment targets for people who identify as having a disability, as several state and territory public sector employers have recently done. While the limitations of existing data are recognised, this should not be a barrier to setting targets to actively measure and drive improvements in this important area given the substantial benefits it can deliver to the APS and the broader Australian community.

The *As One Strategy* highlights, that an increasingly diverse workplace provides four crucial advantages to the APS: strategic policy insight, retention of workforce, mainstreaming of productivity enhancing technology and the promotion of inclusive leadership practices. Through your time at Telstra and its roll out of the Supported Workforce Program, you will have witnessed firsthand the empowering nature of inclusive employment for both the employers and the employee. The APS has the capacity to emulate this success on a much broader scale and provide inclusive corporate leadership to employers across Australia, further enhancing the ability of the APS to demonstrate the advantages of inclusive workplaces to employers nationally.

To complement cultural measures, continued innovation and the procurement of accessible information and communication technologies (ICT) represent practical solutions that allow people with disability to participate fully in the workforce. There continue to be substantial advances in the technology available and its affordability, and it is essential that policy and program settings are sufficiently flexible to accommodate these and the substantial benefits they offer.

Vision 2020 Australia provides this submission in addition to earlier and ongoing advocacy that calls for the APS to provide meaningful and supported employment opportunities for people with disability.

As part of this advocacy effort, a position statement titled: **Meaningful employment for people with disability in the Australia Public Service**, was prepared and provided to the Australian Public Service Commission in 2017. The position statement highlights four key actions that would alleviate barriers people with disability when seeking employment in the APS:

- Implement an overall target of seven per cent for people who identify as having a disability, including people who are blind or vision impaired, employed in the APS workforce to be achieved within five years (2018-2023).
- Implement an APS disability internship initiative.
- Ensure the *RecruitAbility* scheme is mandatory across all APS agencies and levels.
- Ensure recruitment processes and ICT policies facilitate accessibility for people with a disability and enable the reporting of disaggregated data to extract information on disability type.

A copy of the position statement is attached and we look forward to having the opportunity to discuss these recommendations with you further as the Review progresses.

Further to this submission, Vision 2020 Australia has commenced initial discussions with staff at the Australian Public Service Commission around some concrete and impactful suggestions that could help facilitate greater employment for people who are blind or have low vision in the APS as we think there are some relatively simple interventions our members may be able to support which could enhance the experience of both employers and employees and inform broader approaches to enhancing disability employment in the APS.

Breaking down these barriers will not only allow great employment opportunities for people with disability in the APS but also ensure a better resourced and diverse public service, which will more closely reflect and support the Australian population.

Should you require any further information please do not hesitate to contact me via email [ceo@vision2020australia.org.au](mailto:ceo@vision2020australia.org.au) or telephone 03 9656 2020.

Yours sincerely



**Judith Abbott**  
Chief Executive Officer

# Position statement on meaningful employment for people with disability in the Australian Public Service

October 2017

## Executive Summary

Access to meaningful employment free from discrimination is a fundamental human right of all Australians and is essential for building a prosperous and egalitarian society. Meaningful employment is integral to an individual's ability to remain independent, empowered and connected with their community, and to maximise opportunities for participation in all aspects of daily life.

Australia strengthened its commitment to the rights of people with disability, including the right to employment, ratifying *The United Nations Convention on the Rights of Persons with Disabilities* (CRPD) in 2008. Additionally, the *Federal Disability Discrimination Act 1992* (DDA) provides protection for all Australians against discrimination based on disability. Building on the principles of the CRPD and the DDA, Australia has fully committed to the implementation of the National Disability Insurance Scheme (NDIS), which has the potential to empower people with disability by providing the freedom of choice and control over the services and supports they need to fully participate in social and economic life.

Despite these commitments, people who are blind or vision impaired and people who identify as having a disability more broadly, remain significantly underrepresented, and face multiple barriers when it comes to participating in the workforce. Nearly one in seven working aged Australians (16-64 years) are living with a disability with a workforce participation rate of just 53.4 per cent, compared to 83.2 per cent for the remainder of the population.<sup>i</sup> More so, it is estimated that 58 per cent of working aged Australians who are blind or vision impaired are unemployed and one third of those who are employed would like to work more hours, highlighting the issue of underemployment.<sup>ii</sup> It is estimated that if an additional 100,000 people with disability were employed by 2050, this would add an additional one per cent to Australia's Gross Domestic Product.<sup>iii</sup>

While the Australian Public Service (APS) is a major employer across Australia, there has been a consistent decline in the inclusion of people who identify as having a disability in the APS workforce, from 6.6 per cent in 1986<sup>iv</sup>, down to 4.1 per cent in 2005 to 3.74 per cent in 2016.<sup>v</sup> Notably, one such way in which the APS is seeking to improve career pathways into the APS is the *RecruitAbility* scheme, offering candidates who identify as having a disability automatic access to the next stage of the selection process, typically an interview. However, while all agencies are encouraged to adopt the scheme, it is currently not mandatory.

The current lack of visibility of people who identify as having a disability in public roles such as the APS makes it difficult for private sector employers to recognise the potential of people with disability. People with disability have a range of skills, capabilities and interests to bring to the workforce. Supporting workplace diversity, leads to increased representation of people with disability in the public and private sector workforce and improves effectiveness and productivity. As an important first step, direct leadership by the Australian Government will work to diminish the negative

assumptions and pervasive stereotypes surrounding people with disability that continue to contribute to discriminatory employment practices.

Vision 2020 Australia therefore considers it critical that the Australian Government address this issue and demonstrate their commitment to diversity by implementing the following package of measures:

1. Implement an overall target of seven per cent for people who identify as having a disability, including people who are blind or vision impaired, employed in the APS workforce to be achieved within five years (2018-2023).
2. Implement an APS disability internship initiative.
3. Ensure the *RecruitAbility* scheme is mandatory across all APS agencies and levels.
4. Ensure recruitment processes and information and communication technology (ICT) policies facilitate accessibility for people with a disability.

## Vision 2020 Australia position

### **1. Implement an overall target of seven per cent for people who identify as having a disability, including people who are blind or vision impaired, employed in the APS workforce to be achieved within five years (2018-2023)**

Setting specific measurable targets and establishing a plan to meet them is an effective way to improve disability inclusion in the workplace by improving accountability and transparency. Vision 2020 Australia recommends implementing an overall target of seven per cent for people who identify as having a disability, including people who are blind or vision impaired, employed in the APS workforce to be achieved within five years (2018-2023). Meeting this target will move the APS beyond where they were more than 30 years ago in 1986 at 6.6 per cent and will double APS inclusion efforts from 3.74 per cent of people who identify as having a disability employed in 2016.

In order to meet this target within a five-year timeframe:

- a. It will be essential for APS annual recruitment strategies to include a progressive percentage target of people who identify as having a disability.
- b. The target should be applied in a meaningful way with a true commitment to workplace participation by people who identify as having a disability, across all APS departments and across all levels, including the Executive Level and Senior Executive Service classification level.
- c. The target should stimulate career pathways for young people with a strong emphasis on recruitment at the Trainee, Graduate, APS 1 and APS 2 classification levels.

### **2. Implement an APS disability internship initiative**

Existing schemes such as work-for-the-dole programs and proposed policy commitments such as Youth Jobs PaTH require individuals to take part in employment that may not be relevant to their individual goals and aspirations and therefore will be unlikely to have a long-term impact on their employment outcomes. As such, it is essential that an APS disability initiative for young people takes a holistic approach in order to meet a person's individual goals and career objectives.

The purpose of the disability internship is twofold; not only will the initiative promote job readiness for people who identify as having a disability and stimulate career

pathways into the APS workforce, but it will simultaneously increase visibility with the view to diminish negative attitudes and misconceptions surrounding people who identify as having a disability.

It is anticipated that individuals participating in the APS disability internship initiative will be aged between 16 and 25 years, with an expectation to complete a minimum of 15 to 25 hours per week, over the course of a minimum of three months, or as negotiated with their employer.

At an operational level, the APS disability internship initiative must:

- a. implement flexible working arrangements and reasonable adjustments to meet the individual needs of interns;
- b. design placements which are tailored to the specific goals and aspirations of the individual;
- c. not affect any government payments, allowances or concessions;
- d. reimburse interns for costs associated with travel;
- e. be applied across all APS departments, with a minimum requirement of 50 internship placements in year one, with the intent to double intake each year with the aim of 200 placements by the end of year three.

### **3. Ensure the *RecruitAbility* scheme is universally applicable**

Ensuring the *RecruitAbility* scheme is mandatory across all APS agencies and all level vacancies, rather than operating on an opt-in basis, will better support people who identify as having a disability in the APS selection processes, while ensuring that merit remains the foundation for employment and promotion. In the long term, a universally applicable *RecruitAbility* scheme will work to facilitate cultural change during the recruitment process, contributing to a workforce that is diverse and skilled.

### **4. Information and communication technology (ICT) procurement and recruitment**

In September 2016, the Australian Government announced their intention to adopt an Australian Standard on ICT accessibility, to support access to ICT for people who identify as having a disability. While this presents a promising opportunity for creating inclusive work environments, current recruitment processes are often a significant barrier to employment for people who are blind or vision impaired, and people with disability more broadly. As such, it is essential all recruitment processes are viewed through the lens of accessibility to ensure the entire application, interview and contracting process is accessible.

To ensure that recruitment processes are accessible for people with disability, it is essential the APS conduct a review of their recruitment processes and agencies, and identify the necessary steps to become fully compliant. It is also important that unconscious bias training be undertaken by recruiters.

In relation to ICT procurement policies, the APS must lead by example to explore opportunities to improve ICT procurement guidelines that support workplace diversity, by:

- a. conducting an immediate review of ICT Procurement Guidelines;
- b. appointing a director for ICT procurement to oversee a strategic review process and to ensure accessible ICT systems form part of action plans;

- c. including accessibility and disability procurement standards in all government tendering guidelines and ensuring government contractors also meet minimum requirements especially with respect to ICT procurement policies; and
- d. Mandatory reporting on disaggregated data.

While the APS reports annually on the number of employees who identify as having a disability, this information is not disaggregated, and therefore cannot be used to extract meaningful information. To this end, Vision 2020 Australia recommends that the APS employ mandatory reporting to capture and monitor data on the number of people who identify as having a disability employed in the APS, disaggregated according to level of employment and primary disability, with a specific category for blindness and vision impairment. This data should be transparent and presented to the Australian Parliament on an annual basis to ensure accountability towards a target of seven per cent over five years (2018-2023).

## Policy context

In Australia it is estimated that 58 per cent of working aged Australians who are blind or vision impaired are unemployed, compared to 5.6 per cent unemployment rate of the wider population.<sup>vi</sup> This means that people who are blind or vision impaired are more than ten times more likely to be unemployed when compared to the general population. Additionally, one in four people who are blind or vision impaired report experiencing some level of discrimination in relation to their employment.<sup>vii</sup>

Australia is committed to the full and equal enjoyment of all human rights for people with disability, including access to rewarding and dignified employment. The CRPD considers a universal access approach to all aspects of civil, political, social, economic and cultural life, and promotes equity and fairness for all people with disability. Article 27 of the CRPD Work and Employment, requires that 'States Parties recognise the right of persons with disabilities to work, on an equal basis with others.'<sup>viii</sup> Australia ratified the CRPD in 2008 and is therefore committed to promoting and protecting the articles contained within it.

Additionally, the domestic legal framework in Australia includes the DDA and Fair Work Act which prohibit employment discrimination on the basis of disability. Section 15 of the DDA makes specific provision that it is 'unlawful for an employer or a person acting or purporting to act on behalf of an employer to discriminate against a person on the ground of the other person's disability.'<sup>ix</sup> Embedded within the principles and values of the CRPD, the NDIS is set to be one of the most significant reforms in disability policy in Australia's history. While the NDIS does not provide specific funding for employment support for people with disability, it does provide a range of services and supports that have the potential to empower and enhance the capacity of people with disability to achieve their career aspirations. A recent analysis of the potential scale of NDIS economic benefits suggests that when fully implemented the NDIS will lead to between 25,000 and 40,000 new jobs for persons with disability.<sup>x</sup>

While the APS has taken steps to improve the inclusion of people with disability, through implementation of the *As One: Making it Happen APS Disability Employment Strategy 2016-19*, there is still much work to be done. According to recent estimates, the majority of APS employees who identify as having a disability are clustered at mid-level classification level APS 4 and APS 6 at 26.2 per cent and 21 per cent respectively.<sup>xi</sup> The average age of APS employees who identify as having a disability is 47.2 years, compared to 43.4 years for the remainder of the APS workforce.<sup>xii</sup>

Evidence suggests that people who are employed by the APS and identify as having a disability are of mature age, with significant skills and valuable years of work experience. Comparatively, the proportion of employees with disability is considerably less at the Trainee, Graduate and APS 1 and APS 2 level classifications.

This demonstrates that there are inadequate career pathways for young people who identify as having a disability entering into the APS workforce. Additionally, the proportion of people who identify as having a disability steadily declines at the Executive Level and Senior Executive Service level classifications, indicating insufficient access to opportunities for promotion, training and professional development.

Recruitment practices can act as a significant barrier to employment for people who are blind or vision impaired and people with disability more broadly. As such, it is integral that the concept of 'reasonable adjustment' in inclusion planning is extended to ensure recruiting departments are actively encouraged to provide support to candidates with a disability. Additionally, while people who are blind or vision impaired may require adaptive technology to assist them with performing work functions, ICT procurement policies can act as a barrier to workforce participation for people with disability. However, many programs subsidise the aids and equipment required to continue performing productively in the work place.

## Vision 2020 Australia

Established in October 2000, Vision 2020 Australia is part of *VISION 2020: The Right to Sight*, a global initiative of the World Health Organization and the International Agency for the Prevention of Blindness. Vision 2020 Australia is the peak body for the eye health and vision care sector, representing around 50 member organisations involved in: local and global eye care; health promotion; low vision support; vision rehabilitation; eye research; professional assistance and community support.

## The Vision 2020 Australia Independence and Participation Committee

Vision 2020 Australia's Independence and Participation Committee (the Committee) brings together a diverse group of members providing services and supports to people who are blind or vision impaired across Australia; enabling a unique platform for stakeholders to collaborate, foster consensus and develop a shared understanding on matters of significance affecting member organisations and consumers. Through drawing on the knowledge, experience, and resources of the Committee's broad and inclusive membership, the Committee is central to supporting one of Vision 2020 Australia's key roles as an effective conduit to government, offering a unified and consistent voice.

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<sup>i</sup> Australian Bureau of Statistics, Disability, Ageing and Carers, Australia: First Results, 2015, available at <http://www.abs.gov.au/ausstats/abs@.nsf/mf/4430.0.10.001>

<sup>ii</sup> Vision Australia, Employment Research Survey Report, Research and Measures Team, May 2012.

<sup>iii</sup> Australian Government Productivity Report, Disability Care and Support, August 2011, available at <http://www.pc.gov.au/inquiries/completed/disability-support/report>

<sup>iv</sup> Australian Government: Australian Public Service Commission, Employment of people with disability in the APS, August 2012, available at <http://www.apsc.gov.au/publications-and-media/archive/publications-archive/people-with-disability>

<sup>v</sup> Australian Government: Australian Public Service Commission, State of the Service Report 2014-15, available here <https://stateoftheservice.apsc.gov.au/learn-more/representation-of-people-with-disability-data/#Table2>

<sup>vi</sup> Vision Australia, Employment Research Survey Report, Research and Measures Team, May 2012 and Australian Bureau of Statistics, Labour Force, Australia: August 2017, available at <http://www.abs.gov.au/ausstats/abs@.nsf/mf/6202.0>

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<sup>vii</sup> Vision Australia, Employment Research Survey Report, Research and Measures Team, May 2012.

<sup>viii</sup> The United Nations Convention on the Rights of Persons with Disabilities, available at <http://www.un.org/disabilities/convention/conventionfull.shtml>

<sup>ix</sup> Australian Government Disability Discrimination Act 1992, available at <https://www.legislation.gov.au/Details/C2015C00252>

<sup>x</sup> Dr B Long, Senior Research Fellow for National Disability Services, Every Australian Counts and Centre for Applied Disability Research, Economic Benefits of the NDIS, May 2015, available at [https://www.nds.org.au/policy/nds-report-projects-economic-benefits-of-the-ndis?\\_cldee=aGZpdHpzaW1tb25zQHZpc2lvbjlwMjBhdXN0cmFsaWEub3JnLmF1](https://www.nds.org.au/policy/nds-report-projects-economic-benefits-of-the-ndis?_cldee=aGZpdHpzaW1tb25zQHZpc2lvbjlwMjBhdXN0cmFsaWEub3JnLmF1)

<sup>xi</sup> Australian Government: Australian Public Service Commission, State of the Service Report 2014-15, available here <http://stateoftheservice.apsc.gov.au/learn-more/representation-of-people-with-disability-data/#Table2>

<sup>xii</sup> Ibid