NESA's response to the

Senate Standing Committee on Community Affairs

INQUIRY

Delivery of outcomes under the National Disability Strategy 2010-2020 to build inclusive and accessible communities

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Presented by:

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The National Employment Services Association (NESA) welcomes the opportunity to contribute to the Senate Standing Committee on Community Affairs' inquiry into *delivery of outcomes under the National Disability Strategy 2010-2020 to build inclusive and accessible communities*.

This response builds on previous work done by NESA concerned with employment opportunities for Australians with disability, most recently Strengthening Disability Employment Services (2014), National Disability Employment Framework - Issues Paper (2015) and Opportunities through Employment (2016) (see www.nesa.com.au).

About NESA

NESA was established in 1997 to be the voice of Australia's now world-renowned[1] contracted employment services sector. We have served that sector diligently and effectively since that date, and have participated strongly in the establishment of an employment services system which has a pivotal role in assisting the Australian Government to achieve its policy objectives in workforce participation, productivity and social inclusion.

NESA represents the full range of contracted employment services providers, including not-for-profit and private organisations servicing all government employment programmes.

Scope of the submission

NESA's focus is on employment, which is directly impacted by all aspects of accessibility. Our submission responds to the Terms of Reference through the lens of our vision which is 'opportunity for everyone through employment and inclusion'.

Summary

There have been many encouraging developments in national policy and international agreements, and much written, regarding opportunities and inclusion for people with disability, and yet many of these ideas still struggle to find consistent concrete implementation. Inclusion for people with disability remains a pressing issue.

Employment figures are a strong indicator of inclusion and labour force figures show that for people with disability, **the employment situation is worsening.**

Greater inclusion of people with disability in the social and economic fabric of Australia continues to be hindered by a combination of environmental and attitudinal barriers. There are complex and long-range considerations set out in the National Disability Strategy which lay a strong foundation for the transformation required. But more needs to be done to drive progress on this Strategy.

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[1] OECD (2012), *Activating Jobseekers: How Australia Does It*

The vision is clear and a good implementation plan has been outlined and agreed across Australian governments which is a considerable feat. It requires a collective effort and multifaceted change processes across many sectors of society. The challenge now is to identify catalysts that will successfully motivate the required effort and that activate the change processes.

NESA would like to contribute to the current inquiry by proposing that government support the establishment of **Local Community *Accessibility League Tables*** to raise awareness and leverage *Corporate Social Responsibility* and political capital to turn accessibility into a vector for positive marketing through technology-driven plebiscite. To succeed this initiative should be led by people with disability. It requires attention as it could be a critical catalyst for achieving the goals of the Strategy and imperative to improve employment participation.

Negative trends

The Australian Bureau of Statistics has tracked Labour Force data for people with disability since 1993[2].
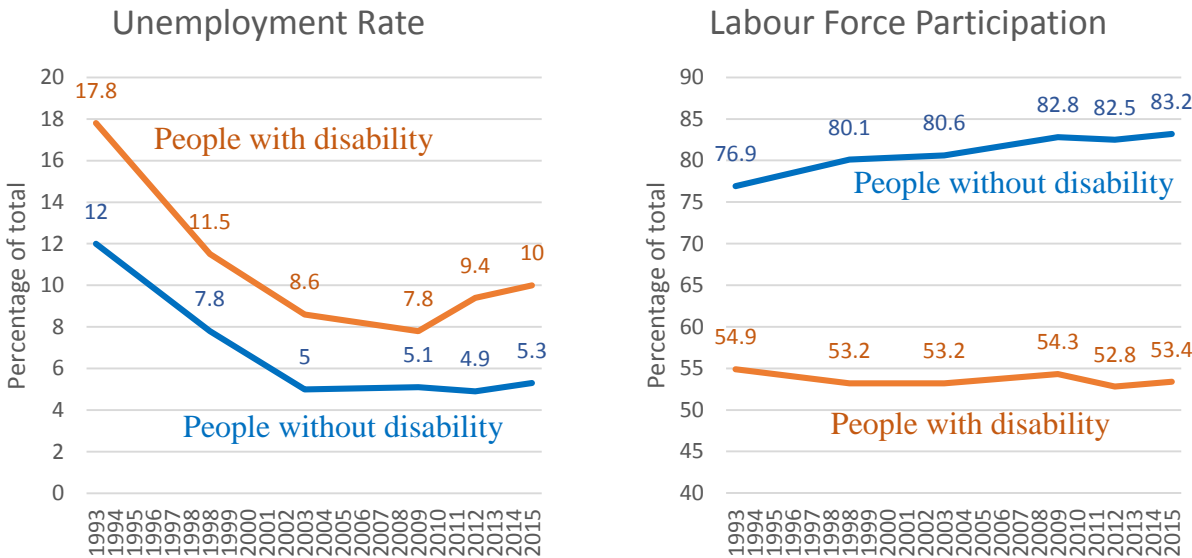
Unemployment rates

Although not an annual survey, the data show that in the sixteen years to 2009, the gap between the unemployment rates of people with disability and people without disability was steadily closing: 5.8% in 1993, down to 2.7% in 2009. However the 2015 difference was 4.7% and *the figures show a worsening trend*.

Participation rates

Over the same period, participation rates for people with disability have varied little and although finishing on a slight upward trend, were *1.5% lower in 2015 than they were in*

1993. At the same time, participation rates for people without disability have been both significantly higher (22% at their closest in 1993) and showing a consistent annual increase of about 0.3%: *the gap is widening*.

Reversing these negative trends and creating an inclusive society requires greater accessibility across the board alongside other initiatives. Improved support options through the National Disability Insurance Scheme (NDIS), along with improved tailored employment services and labour market assistance will all help but cannot succeed on their own. If Australian governments want to reap the full benefit of their bipartisan decisions to invest in the NDIS and employment services they must also pay attention to accessibility.

Accessibility is for everybody

The notion of *accessibility* is often imagined in overly simplistic terms: *wheelchair access* being a common characterization. But accessibility is far from just a *physical mobility* issue. The concept touches any kind of human interaction with the external environment, and covers mobility, visual and auditory perception, cognitive issues and so forth. Rather than treating accessibility as a question of providing environmental modifications aimed at a particular kind of disability, the notion is more reasonably thought of in terms of global ease of use of the physical and technological environment, and clarity of communications, both in their form and their content.

Furthermore, *end-to-end accessibility* – uninterrupted capacity to achieve a complex task from planning to completion – is a consideration bringing into play not only isolated solutions, but also their interdependence. This notion is also sometimes called the "travel chain", or "whole of journey accessibility" where it involves movement through the environment, as such movement represents a whole chain of challenges, within which if any one "link" is unachievable, the chain is broken and the whole process becomes impossible.

For example, providing obstruction-free access to a building is no good if the building has internal stairs and no lift, or if there is no accessible public transport to get anywhere near it in the first place; there is no point assuring wheelchair access to your restaurant if you do not also assure it in the toilet facilities, or if the tables are too close together to allow easy circulation; a sign in braille is no good is if it is out of reach; there is no point having a mostly WCAG[3]-compliant website if access depends upon a CAPTCHA challenge (only accessible to sighted internet users), and so on. Well-meaning accessibility solutions are often proposed in piecemeal fashion which fails to take end-to-end accessibility into account.

Accessibility is really about creating resources – from the large-scale built environment down to the interfaces of personal technological devices (like mobile phones, for instance) – in such a way as to allow them to be **maximally usable by *the broadest range of people***. This is the principle of Universal Design.

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[3] Web Content Accessibility Guidelines https://www.w3.org/WAI/intro/wcag.php

If applied comprehensively universal design would offer the nearly 20% of the population who experience access challenges equal opportunities to participate fully in social and economic life, including in employment and as consumers. Universal design would also assist much wider parts of the population who may experience short and long term access challenges when they or their family members acquire an illness or injury.

We are all differentially "abled" and this is changeable throughout our lives. Universal Design principles for greater accessibility work towards creating a more user-friendly environment for everybody.

The converse is true when our society is designed for only dominant cohorts. The German Federal Ministry for Economic Cooperation and Development paper Disability and Development Cooperation – 10 facts or fallacies[4], stated it thus: *"Inclusion will be feasible when we stop automatically tailoring society and development programs towards the mainstream 'healthy young man*".

To be fair, headway has certainly been made in recent decades to move Australian policies and attitudes away from such narrowly targeted conceptions, yet still, as recently as 2009 it was observed that *"the impact of the built environment on people is something many rarely consider."* [5] The capacity to participate fully in society requires, at a most basic level, the ability to circulate freely, which is something taken so utterly for granted by people without motor or perceptual disability as to remain a paradoxically persistent issue.

Change in the built environment will occur most effectively through change in general social expectations which will both inspire and be led by changes in attitudes of engineers and designers. The paradox is that change in social attitude is most robustly driven by *awareness*, but while people with (particularly motor and perceptual) disability are prevented from physically moving around and interacting freely, they remain isolated and thus largely *invisible* and as such, awareness of their situation remains low and limiting stereotypes persist.

This tendency can – in principle – be flipped on its head: greater awareness will lead to better environmental design which will allow greater participation, greater inclusion and hence heightened visibility for people with certain kinds of disability, which will further improve awareness and so on. As yet, however, any such upward spiraling momentum is only just beginning and could easily falter without consistent support and attention.

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[4] Deutsche Gesellschaft für Technische Zusammenarbeit (GTZ) GmbH, 2010, https://www.giz.de/fachexpertise/downloads/Fachexpertise/giz2010-en-disability-and-development-cooperation.pdf
[5] SHUT OUT: The Experience of People with Disabilities and their Families in Australia. National Disability Strategy Consultation Report prepared by the National People with Disabilities and Carer Council (2009), p.42

Employment participation for people with disability is a priority

In the National Disability Forum 2014 - Summary of Survey Results[6], respondents, themselves people with disability, were asked to rank the issues that needed the greatest attention. Unsurprisingly, the top ranked response was *participation and inclusion in society*, followed closely by **employment**. Improving employment prospects for people with disability has also recently been highlighted by the OECD as a pressing requirement for Australia's economic future[7].

Participation in the workforce is not only a means to financial stability, it is also important for self-esteem and sense of purpose. Exclusion from work renders people dependent upon others, or upon welfare or both, and negatively impacts both mental and physical health.

Assuring greater access to employment directly improves national productivity. A larger workforce means a broader tax base as well as less people requiring welfare support, both of which represent positive financial outcomes for government and which will have further positive financial effects down the line, even if they are harder to measure: a net improvement in the mental and physical health of the population, which lowers general health care expenditure, as well as a whole range of allied social expenses that are incurred by negative social forces such as disenfranchisement, frustration and depression.

A 2011 study by Deloitte[8] found that *"if the gap between the participation rate and unemployment rate for people with and without disability could be reduced by just one third, phased in over the next decade, the cumulative impact on GDP over the next decade would be $43 billion. The modelling also suggests that GDP will be around 0.85% higher over the longer term, which is equivalent to an increase in GDP in 2011 of $12 billion. This is only the direct impact on GDP, and does not include the indirect impact of improved government fiscal balances. Nor does it include the broader welfare gains for the individuals that secure employment, and their families and carers."*(p.25)

The barriers to employment confronting people with disability include environmental and attitudinal issues with widespread misconceptions, negative stereotypes and bias. NESA notes that the latter problem also unfairly limits employment participation for some other groups that experience disadvantage in labour markets, such as Indigenous Australians, migrants and women.

Attitudinal forces keeping people with disability out of employment include employer fears that employees with disability will *cost more*, be *less productive* and *harder to manage*.

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[6] National Disability Forum 2014 - Summary of Survey Results, Australian Human Rights Commission. https://www.humanrights.gov.au/our-work/disability-rights/publications/national-disability-forum-2014-summary-survey-results

[7] OECD (2017), Connecting People with Jobs: Key Issues for Raising Labour Market Participation in Australia

[8] The economic benefits of increasing employment for people with disability. Commissioned by the Australian Network on Disability August 2011. Deloitte Access Economics http://www.and.org.au/data/Conference/DAE_Report_8May.pdf

Repeated research into precisely these questions shows all three fears to be unfounded. Indeed one 2002 study of employing people with disabilities indicated that these misconceptions were not only erroneous, but actually the reverse of what was observed: the cost of recruiting an employee with disabilities was generally lower, their productivity was equal or greater than other workers, and they exhibited better attendance and lower occupational health and safety incidents.[9]

Misconceptions such as this are perpetuated by lack of exposure – ignorance, in effect.

> *Familiarity with people with disability – that is, knowing them personally as acquaintances, friends and colleagues – seems the most promising way to increase respect and inclusion, especially if exposure is consistent and recent.* [10]

Such familiarity assists inclusion but also comes from inclusion. There is a vicious cycle at work where lack of visibility of people with disability in workplaces contributes to a lack of familiarity, low expectations and bias, which in turn contributes to low participation. There is a need for a catalyst to help work this circle the other way. For example, increasingly inclusive workplaces alongside an increasingly inclusive education system will build expectations, familiarity and an increasing momentum for action on inclusion.

Greater access to education (from early childhood onwards) will also aide employment participation for people with disability because of the strong correlation between educational achievement and employment[11] (see OECD chart).

Average OECD employment rates by educational attainment

Educational level attained

Anything that limits access to education and positive education outcomes for people with disability unfairly compounds the effects of difficulties that they are already facing and fuels broader biases that stand as additional barriers to later-life social inclusion and employment prospects.
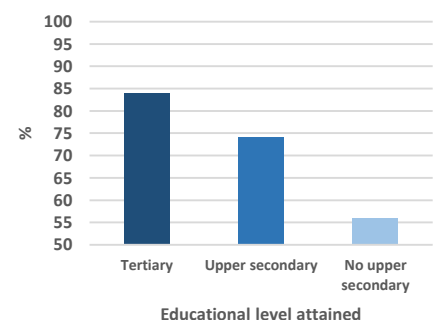
A catalyst that motivates action on accessibility

The status quo is one in which people with disability are often poorly serviced by structures and processes that are already in place, that have been for a long time, and that will not be effective without some kind of ***disruption***.

[9] Graffam J, Shinkfield, A., Smith, K., & Polzin, U. (2002) Employer benefits and costs of employing people with disability, Journal of Vocational Rehabilitation (17) 251.

[10] Thompson, et al. (2011) Occasional Paper No. 39 - Community attitudes to people with disability: scoping project. Social Policy Research Centre, Disability Studies and Research Centre, University of New South Wales.

[11] OECD (2011) How does education affect employment rates?, in *Education at a glance 2011: Highlights* OECD Publishing. http://dx.doi.org/10.1787/eag_highlights-2011-16-en

The poor uptake of the Liveable Housing Design initiative[12] for example has shown that a *guidelines + industry goodwill* on its own simply do not work. Strengthened *regulations* (such as building and planning regulations) are required and definitely part of the solution, however, they too are unlikely to be successful on their own. Current Standards for Education Access and Public Transport provide examples of relatively well considered national regulation but they too have been slow in making a difference.

An effective catalyst that complements the current levers for change will be a positive one. Designers, developers, political and corporate decision-makers and implementers would all benefit from an additional *driver* to increase accessibility.

A Local Community Accessibility League Table

NESA proposes creating incentives that act at a local community level. Providing incentives for local councils and businesses to work together to create end-to-end accessibility in their local communities. The proposal aims to leverage the intrinsic driver of Corporate Social Responsibility, as well as work with the spirit of friendly competition and local political capital. It provides a means to raise awareness and create positive competitive drivers that will promote accessibility.

The proposal first requires the establishment of a cogent and manageable set of **national accessibility indicators** which can be measured and compared across communities. They would draw on standards and other instruments that already exist. They might for example consider the proportion of accessible housing, whether there is appropriate way-finding signage and accessible information about local services. The initial step will be developing these indicators which should be driven by a committee *of people with lived experience of disability*, who have direct and relevant understanding of the full scope of the question of accessibility. It would also need to be informed by researchers and evaluators familiar with this kind of measurement and related scoring systems (e.g. 5 star hotels). NESA envisages that the indicators could change over time as new and different priorities appear.

Once established, the indicators will be used – with both public and technological aid (employing online resources and social media and mobile apps –perhaps similar to the rating apps like 'trip adviser') – and **accessibility scores** will be applied to local communities. NESA believes this would best be achieved at a local government level as they have after all signed up to the National Disability Strategy and already have a local community identity and infrastructure. Other options could be explored.

The scores will be centralised on an **Community Accessibility League Table** which will be public and accessible (it could for example be hosted on the Department of Social Services website and accessed via mobile apps) and will include calculation of higher-order scores for

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[12] PROPOSAL FOR CHANGE: NATIONAL CONSTRUCTION CODE SERIES Accessibility in housing, Australian network for Universal Housing Design. https://aduhdblog.files.wordpress.com/2016/05/accessibility-in-housing-abcb-proposal-with-insets.pdf

areas ultimately allowing scrutiny and comparison.

Incentives to get good scores will include attracting disability consumer dollars (such as tourists) as well as relevant businesses and political kudos. Communities with high scores can use it to market themselves. It would also be important to provide *financial incentives* and/or awards for achieving (and perhaps maintaining) high accessibility scores contributing to the sense of positive competition.

It is not hard to imagine that, if successful, the Accessibility League Tables could be picked up by various news media formats offering effective awareness raising. They could also be promoted internationally.

Not a panacea…

Action must be taken to improve the lives of people with disability. NESA's proposal is a simple idea; it does not pretend to address the totality of the problem, which, as discussed, requires multifaceted strategies impacting across all sectors and domains of life.

But anything that contributes positively towards these ends is a worthy investment, and the Accessibility League Tables proposal would create strong positive incentives for change, adding momentum to the shift towards a more inclusive and accessible Australia.