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DIVERSITY
COUNCIL
AUSTRALIA

**Submission on the
Commonwealth Discussion Paper on
improving the employment participation
of people with disability in Australia**

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About DCA

Diversity Council Australia is the only independent, not-for-profit workplace diversity advisor to business in Australia. We offer a unique knowledge bank of research, practice and expertise across diversity dimensions developed over more than 25 years of operation. In partnership with our members, our mission is to:

1. Lead debate on diversity in the public arena;
2. Develop and promote the latest diversity research, thinking and practice; and
3. Deliver innovative diversity practice resources and services to enable our members to drive business improvement.

DCA provides diversity advice and strategy to over 180 member organisations, many of whom are Australia's business diversity leaders and biggest employers. Our founding members include ANZ Bank, AMP, AXA, BHP Billiton, Boral, IBM Australia, Orica, Rio Tinto and Westpac.

The business case for action on disability

There is considerable evidence to support the business case for diverse workplaces and for the inclusion of people with disability in particular.

In a tight labour market, employers are beginning to realise that they need to recruit from a more diverse talent pool in order to meet their workforce needs and people with disability represent a clearly untapped talent pool. The issues of recruitment and retention are becoming even more critical in the context of the ageing of Australia's labour market.

The economic argument for increasing Australia's workforce participation is now well established – our population is rapidly ageing with significant implications for national productivity. The 2010 Intergenerational Report¹ estimates that the number of people in Australia aged between 65 and 84 will more than double over the next 40 years, with the number of people aged 85 years or more increasing fourfold. It is estimated that people aged 45 and over will need to provide 85% of workforce growth in the next decade in order to meet the labour demands of employers.²

The consequence is that there is a strong imperative for both government and business to keep mature age people in the workforce for longer, and increasing numbers of these people will experience disability as they age. ABS statistics indicate that there is a strong relationship between age and disability. In the last survey, 3.4% of those aged four years and under were affected by disability, compared with 40% of those aged 65-69 years and 88% of those aged 90 years and over.³

Notwithstanding the sheer impact of demographic changes on the need to better support people with disability in the workforce, research indicates that the productivity and engagement of employees with disability is as good as, and in many cases, superior to their colleagues without disability.

Studies have shown that people with disability often surpass their counterparts without disability in terms of loyalty and productivity in the workplace. Research cited by the Australian Network on Disability indicates that 90% of employees with disability record productivity rates equal or greater than other workers and 86% have average or superior attendance records.⁴

Other surveys have found similar results. A study conducted on behalf of Telstra found that over a 15 month period employees with disability had 11.8 days absent, compared to employees without disability who had 19.4 days absent.⁵

Finding and keeping the best talent

A research project conducted by Deakin University found that the cost of recruiting a person with disability was just 13% of the cost of employing a person without disability.⁶

Considering potential employees regardless of disability means that organisations have access to the broadest possible talent pool and can benefit from a diverse range of skills, abilities and valuable new perspectives.

Similarly, labour market pressures increase the impetus to retain the skills and corporate knowledge of existing employees who may acquire a disability. Have higher retention rates. The previously mentioned Telstra study found that employees with a disability stayed with the company for an average of 4.1 years, compared to 3.2 years for employees without disability.

Supporting employees with a disability, and those who may acquire a disability during their employment, also has the potential to strengthen workplace morale and productivity through demonstrating a genuinely commitment by an organisation to the welfare of its employees.

While many employees with disability do not need workplace adjustments, it is also important to consider that even when such adjustments need to be made, employers who have experience in this area understand that the outlay in terms of costs to a business represent money well spent. Data from the Australian Network on Disability indicates that in relation to the cost/benefit of workplace accommodations for employees with disability, 65% of employers rated the financial effect to be cost neutral and 20% identified an overall financial benefit.⁷

Research also indicates that:

- Over 90% of employers who had recently employed a person with disability said they would be happy to continue to employ people with disability;
- 78% of employers described the match between their employee with disability and the job as good.⁸

Workplace safety

Research indicates that employees with a disability have fewer workplace injuries – just 16% of the recorded occupational health and safety incidents of all employees⁹. This means less money is spent on workers' compensation payouts, significantly reducing an employer's financial liability overall. Additionally, the Australian Safety and Compensation Council (ASCC) found that, "Contrary to common perceptions by employers that people with disability pose an increased OHS risk in their workplace, this research shows that the opposite is true." It found "Workers with a disability have on average, a lower number of OHS incidents and have lower workers' compensation costs, in comparison to other employees".¹⁰

Customer satisfaction and competitive advantage

With approximately 20% of the Australian population having one or more disability, a similar percentage of most organisations' customers and clients are also likely to have one or more disability. Having a workforce that reflects the diversity of an

organisation's customer base, and the community in which it operates, can significantly enhance customer satisfaction and loyalty. Having employees with disability in an organisation's workforce offers access to a depth of knowledge and experience in relation to clients, customers and stakeholders with disability, giving organisations a competitive advantage.

This is particularly relevant in relation to the ageing of the population. Recent international research highlights that while business leaders are beginning to focus on the "silver market" – Baby Boomers now entering retirement – due to their significant accumulated wealth and free time, it is a mistake to only direct their marketing strategies to those older people who are rich and physically and mentally able. In the silver market of the future, older people facing health and disability issues are likely to be the majority.¹¹

Legal obligations and risk management

Meeting legal obligations and managing risks are an important business consideration. Companies are less likely to receive a complaint of discrimination if they take active steps to comply with anti-discrimination legislation. Employees and clients can face discrimination, based on their disability, but also other forms of unlawful discrimination including on the basis of their race, age, gender, responsibilities as a carer or sexual identity. Ineffective management of discrimination, harassment and bullying may have significant costs, not only for individual people with disability but for a business in terms of legal costs, costs in time and money for investigating and managing complaints, the cost of staff turnover and damage to their reputation.

Organisations incur a range of quantifiable costs associated with discrimination. Readily quantifiable costs of diversity complaints to the organisation may take the form of negotiated damages (known to have reached \$225,000 in individual matters), awarded damages (known to have exceeded \$100,000), and legal fees (quotes of more than up to \$100,000 to defend complex complaints are not uncommon). DCA member experiences indicate that legal costs can regularly exceed \$100,000 in more complex cases and it would not be uncommon for legal fees to exceed double this amount.

As a general indication of these costs:

- The New South Wales Anti-Discrimination Tribunal (NSW ADT) has estimated the cost of resolving the average 'in-house' serious or complex complaint to be \$35,000. This includes wages and lost productivity for all parties involved – that is, those involved in the allegations and those involved in resolving the complaint. This estimate was made over ten years ago so, allowing for inflation, it is likely this amount would now exceed \$45,000. The recent experiences of DCA members suggest that the cost of resolving the average serious claim would be consistently higher than the \$45,000 estimated by the NSW Anti-Discrimination Tribunal – commonly at least \$90,000.
- DCA has estimated the average cost for a serious external grievance to be \$125,000. This allows for costs associated with managing the complaint, including possible settlement costs. It does not consider more indirect costs associated with lost productivity and turnover.
- The average penalty for sex discrimination in Australia over the period 1985-2000 (when anti-discrimination legislation was administered by the then Human Rights and Equal Opportunity Commission (HREOC)) was almost

\$14,000¹². This does not appear to have significantly changed since the transfer of the hearing function to the Federal Magistrates Court and the Federal Court in 2000. While the highest damages for sex discrimination awarded under the SDA was \$41,488.57 (*Evans v National Crime Authority* [2003] and *Commonwealth v Evans* [2004]), the average damages was approximately \$14,000. The highest damages awarded in sexual harassment cases under the *Sex Discrimination Act, 1984* (SDA) since 2000 was \$392,422.32 (*Lee v Smith (No 2)* [2007]), while the average damages was approximately \$37,000¹³.

- Turnover associated with complaints is common: at least three out of four complainants are no longer actively working for the organisation where the allegations occurred by the time they reported it to the Australian Human Rights Commission (AHRC). As the AHRC points out, this represents a considerable cost to employers in recruitment, training and development, in addition to the indirect cost associated with loss of staff morale inevitably arising from unresolved disputes within workplaces¹⁴. Turnover costs have been variously estimated at between 50 and 150% of the person's annual salary.

Less easy to quantify are the "hidden" costs, including, for example unplanned absenteeism, reduction in work team cohesion and productivity, reduction in staff morale, lost management/employee time (investigations, hearings etc.), resignations and staff replacement costs, workplace accidents, stress and illness claims, damage to the company's reputation, and/or political and industrial relations impacts. For instance, VicHealth research indicates that the health impacts of discrimination include higher rates of depression and other forms of mental illness¹⁵.

Enhancing corporate reputation

As well as these financial advantages, employing a person with disability can have significant benefits in terms of an organisation's corporate reputation, in a competitive market. Being named as an employer of choice has impacts not only on improving access to talent, but on customer views of an organisation, something that is particularly important in an ageing market. In a University of Massachusetts survey, 92% of the American public view companies that hire people with disabilities more favourably than those that do not; 87% of the public also agree that they would prefer to give their business to companies that hire people with disabilities.¹⁶

Research indicates that when employers have a diversity complaint that goes public their share price will drop within 24 hours, while when employers win a diversity award their share price will increase within 10 days¹⁷.

Employing people with disability is not just about "doing the right thing"; it makes good business sense, economically as well as in terms of corporate reputation.

DCA members and the business case for action on disability

While not discounting the considerable work that needs to be done to improve the employment of people with disability in Australia, the strategies being undertaken by many of our members to recruit and retain employees with a disability, are leading practice initiatives. DCA members not only demonstrate leadership with respect to the employment and inclusion of people with disability, but also aim to lead in the provision of inclusive and accessible products and services. Our members understand that a diverse workforce can increase productivity and creativity, enhance organisational responsiveness and increase their business' ability to cope with change.

Leading DCA members realise the business benefits associated with progressing the disability agenda in their own organisations and have shared with us the evidence they have identified in relation to the benefits of employing people with disability:

Six of [our] team members have children or other dependents with special needs and four of its team members have known disabilities. [Our organisation] benefits from their ways to approach a complex problem due to the often innovative ways they approach their day to day lives. When it comes to absenteeism and retention, they are absent less often and have remained with the company longer, on average, than other team members.

Springboard LLC

[Our organisation] is committed to creating a workplace that is inclusive and reflects the diversity of the communities in which we operate. Recruiting a wide range of employees, including those with disabilities, gives ANZ access to a broader range of perspectives and ideas to manage our business, innovate and understand the needs of our customers.

[Our organization] has a long-held and demonstrated commitment to attracting, valuing, including and supporting our employees with disability. In the broader context, [we] believes that building long-term employment opportunities for people with disabilities goes hand-in-hand with boosting productivity and strengthening the capacity for human innovation.

ANZ

A snapshot of employment of people with disability in Australia

As the Discussion Paper has highlighted, in 2013 people with disability continue to experience extremely poor outcomes in terms of their capacity to participate in mainstream employment.

It must be noted that employment participation by people with disability is in the context of a broader environment in which people with disability continue to face discrimination and significant systemic barriers to full inclusion and participation in Australian communities and the social, economic and cultural life of the nation.

With ABS statistics¹⁸ showing a labour force participation rate for people with disability (aged 15–64 years) of 54% compared to 82.8% for people without a disability, there is considerable ground to make up.

Approximately one in five Australians has one or more disabilities. Indeed, between 1981 and 2003, the number of people with disability increased from 1.9 million to 3.9 million¹⁹. This has been attributed to people generally living longer and acquiring disabilities as they age, people with pre-existing disabilities living longer, and changes in social attitudes making many people feel more comfortable about identifying as having a disability²⁰.

It is particularly disturbing that this gap has remained persistent over the last decade. While the number of people with disability has increased over past decades, the gap

in participation between people with and without disabilities remains the same.²¹ This compares unfavourably to women's workforce participation which increased substantially over the past two decades, from 49% in 1984 to more than 65% in 2013²²).

Also noteworthy is Australia's international ranking in this arena. In 2003, the Organisation for Economic Co-operation and Development (OECD) ranked Australia 13 out of 19 countries on the employment rate for all people with disability (42% of all people with disability employed compared to an OECD average of 44%).²³ The OECD has emphasised that employment rate for people with disability is disappointing given Australia's economy burgeoning in recent years.

Further, more than two decades after the establishment of the Disability Discrimination Act 1992 (DDA), a range of state and territory anti-discrimination laws which prohibit discrimination on the grounds of disability, and federal workplace relations laws which prohibit disability discrimination (via the Fair Work Act), there remains clear evidence about the frequency of disability discrimination in the workplace.

As the Discussion Paper indicates, in 2009–2010, disability discrimination accounted for the highest proportion of complaints received by AHRC. This suggests that more is needed to drive equality in employment for people with disability.

The diversity among people with disability

The specific needs, priorities and perspectives of people with disability are based on an individual's personal circumstances, including the type and level of support – if any – they require, their levels of education, gender, age, sexuality, and cultural background. Some people with disability experience multiple disadvantages with gender, race and age in particular, often significantly impacting on the experience of disability.

DCA is pleased to note that the Commonwealth Disability Strategy identifies this diversity of people with disability as an important consideration.²⁴

DCA notes that while the employment circumstances of people with disability as a group are already poor, the employment of women with a disability, Aboriginal and Torres Strait Islander people with disability and those from other culturally diverse backgrounds lags even further behind.

Women with a disability aged 15-64 years have a participation rate of only 49% (60% for men) compared with 72.5% (89% for men) for women with no disability. Some 51% of people with disability report being restricted in the type of job they can do, with 30% reporting restrictions in the number of hours they can work. Only 20% of women with a disability are employed full time, compared to 38% of women with no reported disability.²⁵

The advocacy group Women With Disabilities Australia (WWDA) has pointed out that women with disabilities are one of the most marginalised and disadvantaged groups in Australia.

WWDA has identified that women with disabilities' participation rates in the labour market are lower than men with disabilities' participation rates across all disability levels and types and they are less likely than men with disabilities to receive vocational rehabilitation or entry to labour market programs. Further, open employment services assisting people with disabilities in their efforts to find and maintain jobs on the open labour market are considerably more likely to assist male

clients. In addition, women with disabilities earn less than their male counterparts and are considerably less likely than their male counterparts to receive a senior secondary and/or tertiary education.²⁶

Research undertaken by WWDA, (and similar international research), has also demonstrated that women with disabilities do not need 'incentives' or 'motivation' to take up paid employment. What they do need is the elimination of discrimination and negative stereotypes from both a gender and disability perspective which compound their exclusion from support services, social and economic opportunities and participation in community life.²⁷

The barriers WWDA identifies for women to greater participation in employment are similar to men with disability but may be more significant. Barriers can include:

- Lack of understanding of the complexity and nature of disability
- Negative social attitudes, including employer and co-worker attitudes
- Poverty
- Lack of access to education and training
- Lack of self confidence, assertiveness, and low self-esteem
- Poor job design and inflexible work arrangements
- Lack of attendant care
- Inadequate or expensive transport
- Lack of, inaccessible and inflexible childcare
- Responsibility for domestic and parenting duties
- Experience of abuse, violence and harassment
- Inaccessible and unresponsive employment services
- Restricted access to ICT
- Insecure housing and accommodation
- Lack of awareness about their rights
- Cost of equipment and assistive devices
- Inaccessible built environment
- Lack of portability of state funded programs and
- Cost of disability.

Similarly, Aboriginal people and Torres Strait Islanders with a disability experience far greater challenges in gaining and maintaining employment than other people with disability. Indigenous men have a labour force participation rate of only 63% compared to 84% among non-Indigenous men and Indigenous women 52% compared to 71% for non-Indigenous women. ²⁸

Compounding this, Aboriginal and Torres Strait Islander Australians experience higher rates of disability than do other Australians. This impacts both on the capacity of individuals to gain and maintain employment, but also on Indigenous people as carers. Even taking into account age differences between the Indigenous and non-Indigenous populations, the rate of disability among Aboriginal and Torres Strait Islander Australians is almost twice as high as that among non-Indigenous people.²⁹

Closing the Gap strategies for improving outcomes for Aboriginal and Torres Strait Islander Australians need to tackle specific barriers faced by Aboriginal and Torres Strait Islander Australians with disability.

People from culturally and linguistically diverse backgrounds – in particular newly arrived migrants such as refugees and special humanitarian entrants – can be particularly vulnerable. Those with disability are likely to experience multiple

disadvantages. Lack of accessible information, communication difficulties or cultural sensitivities and differences can create barriers to services and support.

DCA urges the Australian Government to ensure that the diversity among people with disability is reflected in the development of policies and programs to improve employment participation.

Government action to date

DCA welcomes the focus the Australian Government has given to date on improving the social inclusion, and employment outcomes, of people with disability. The introduction of the NDIS and extensive promotion of human rights of people with disability by the Australian Government are significant and must be acknowledged.

Since Australia's ratification of the United Nations Convention on the Rights of Persons with Disabilities in 2008 and the Prime Minister's announcement in 2009 of the development of a National Disability Strategy through COAG as a central mechanism for implementation of the Convention on the Rights of Persons with Disabilities (CRPD) in Australia, there has been substantial action in this area. The 2009 National Mental Health and Disability Employment Strategy and the 2011 National Disability Strategy both develop a strong basis on which to move forward on the issue of employment for people with disability in particular.

The introduction of the NDIS also clearly represents an important measure which can better support the social inclusion and mainstream engagement of people with disability, which will hopefully have a positive impact in terms of in greater workforce participation.

While recognising that there is still more work to be done, DCA would also like to acknowledge the support being currently provided to employers and jobseekers with a disability through existing programs provided by the Australian Government and its partner organisations through initiatives such as JobAccess.

The Discussion Paper

DCA very much welcomes the release of the Australian Government's discussion paper and public consultation process on proposals to boost employment participation for people with disability, by the Minister for Employment and Workplace Relations, Bill Shorten.

At a time in which employment of people with disability has plateaued (at best) the release of this Discussion Paper, Improving Employment Participation of People with Disability, is an important way of engaging employers and the broader community on ways in which reform might best be achieved. We welcome the broadly based terms of reference specifically:

- How to promote and improve equality for people with disability in employment and in the workplace;
- How to support employers to identify and remove barriers to full and equal participation of people with disability;
- How to promote the removal of all forms of discrimination on the basis of a person's disability;
- How to improve workplace consultation between employers and employees on issues concerning people with disability in the workplace; and

- How to improve the productivity and competitiveness of Australian business through the advancement of people with disability in the workplace.

DCA has specifically sought the views of our members on this important issue and the following focuses on those areas of most relevance to our members and reflects their views and experiences.

Barriers to employment of people with disability

The main barriers identified by DCA members facing people with disability in recruitment include both issues with external recruitment agencies and with internal recruitment processes.

Recruitment agencies are perceived to fail to seek out a broad spectrum of talent, or establish effective relationships with people with disability. This is increasingly important when employers rely upon recruitment agencies to represent them.

Accessibility in relation to all aspects of the recruitment process is vital to removing recruitment barriers among both employers and recruiters. This requires organisations and recruiters to address issues with website design, online application processes, preferred methods of communication, physical accessibility and being prepared to provide an expressed willingness to consider workplace accommodations should they be required.

The issue of organisational expectations of disclosure of disability can result in job seekers with a disability being concerned (often with good reason) about discrimination or other elimination from the job selection process following disclosure.

In some member organisations, surveys of employees with disability have clearly indicated that the key barrier to people with disability in recruitment and employment is a lack of understanding from peers and managers. Similarly, managers of employees with disability have indicated that they also believe that a lack of understanding and pre-conceived ideas regarding disability is a barrier to attracting and retaining employees with disability.

Both discriminatory attitudes and unconscious biases within workplaces (which reflect attitudes in the wider community) perpetuate a lack of understanding of people with disability and their capabilities. Individual employers and recruiters appear to often have perceptions that disability hires will require an expensive and extensive financial demand for equipment and workplace modification. Further, employers may have a mindset that disability implies lower levels of performance and capability or that disability equates to extreme physical or mental limitations.

While the experience of many job seekers with a disability suggests an unwillingness on the part of employers to consider their candidature, some DCA members who are genuinely engaged in promoting the employment of people with disability have indicated that they have also identified difficulties in easily finding suitable graduate candidates with disability for specialist roles. It has been suggested that DEEWR could consider sponsoring a centralised mentoring program (such as the Willing and Able Mentoring program or the AES – Aboriginal Employment Strategy Internship program) for students with a disability to help them transition to work. Such a centralised system would promote candidates to employers and enable employers to see the benefits of employing people with disability and mitigate any misconceptions or discrimination, while also assisting candidates to be better job seekers and be more resilient.

DCA has also received feedback from our members that the Disability Employment Scheme (DES) could be improved to include more thorough assessment and

assistance practices. Candidates have claimed that DES is too outcomes focused rather than preparing and facilitating candidates for transition to employment.

Members have also indicated that existing schemes such as Job Access could be promoted more thoroughly to the business community.

Barriers to retention of employees with a disability

Cultural attitudes and biases within workplaces can result in ill-informed perspectives from managers about the capacity of people with disability to succeed in higher level roles. This is mirrored in biases within talent management systems that stereotype and label employees via a lens not based on objective criteria of performance but upon generalisations and perceived organisational fit/style, employee capacity to stretch or grow to new challenges and employee promotional trajectory.

Surveys of employees with disability in DCA member organisations have identified that one of the most important factors to employees with disability is having a supportive and understanding manager with whom they can discuss their disability.

Workplace cultures which are genuinely inclusive are those which support and facilitate success and achievement by all employees and are capable of providing the full spectrum of reasonable workplace accommodations which meet the individual needs of employees.

DCA has carried out a number of research initiatives in recent years investigating workplace flexibility and it is clear that improving access to workplace flexibility for all employees is one of the key actions that will assist in increasing the participation, and particularly improving retention, of employees with a disability. While leading practice employers, including many DCA members, are already putting in place comprehensive workplace flexibility programs, it is clear that further change is needed.

ABS statistics³⁰ show that 51% of people with disability report being restricted in the type of job they can do, with 30% reporting restrictions in the number of hours they can work. Only 20% of women with a disability are employed full time, compared to 38% of women with no reported disability. When people with disabilities are employed and require an average of one day a week away from work because of their condition, the type of arrangements they use are influenced by whether they work full-time or part-time. People working part-time most often reported using 'flexible hours' to accommodate the time off they needed (53%), while those working full-time were most likely to report using 'sick leave' (35%). It is evident that designing flexible working arrangements that can support the needs of employees with a disability is vital.

DCA's recent report *Get Flexible: Mainstreaming Flexible Work In Australian Business*, released in 2012, sets out clear, practical steps for businesses wanting to make flexible work and careers standard business practice. It also recommends actions organisations, the business sector and the broader community can take to mainstream flexible work in the Australian labour market, as follows:

- Change the language – from work-life support and flexible work arrangements/options to flexible work and flexible careers. This can decrease the view that flexible work is 'special treatment' for a select few rather than part of the mainstream business.
- Build flexible work and careers into business strategy rather than bolting it on as a set of policies, a program or a set of arrangements.
- Engage senior leadership teams in a process to:

- Develop a flexibility strategy that clearly identifies what success looks like
- Integrate flexible work into: business, work, job and career design
- Develop guiding principles for flexible work and flexible careers
- Develop a set of measures and a process to evaluate outcomes
- Articulate the activities and resources needed to move to, and maintain, flexible work and careers as standard business practice.
- Develop management capabilities to:
 - Design workplaces, jobs and careers for flexible work
 - Lead teams engaged in flexible work, and
 - Engage in flexible work themselves.
- Develop team capabilities to work differently in a flexible work and career environment.
- Design a business and community awareness campaign to:
 - Reframe the debate about flexible work and the different perspectives employers and employees have on flexibility. This should engage directly with the evidence that links mainstreamed flexibility and: (i) business performance, productivity and sustainability; and (ii) workforce well-being and sustainability.
 - Focus on the community benefits of flexibility in terms of personal and family well-being, as well as the risks associated with not mainstreaming flexibility.
 - Change the language and stop justifying flexible work practices through a narrowly based business case framework (i.e. only assisting with workforce attraction and retention). Take a 'big picture' perspective of flexible work and frame it as a strategic business issue.
 - Develop a set of process and outcome indicators for, and measures of, mainstreamed flexible work.
 - Use the measures to identify organisations that have mainstreamed flexible work, and publicise these.
 - Drive a campaign that helps customers and clients accept and understand the value of flexible work and how this can deliver quality customer/client service.
- Actively engage in debates with employer organisations, unions and governments to show how flexible work based on mutuality can and will contribute to increased productivity and to the success of the Australian economy.

Extending access to workplace flexibility across the workforce improves inclusion and raises awareness and understanding of groups such as people with disability and carers, including their experiences beyond the workplace. It also ensures extending access who may have a hidden disability or other needs beyond the workplace such as caring responsibilities are managed and supported in an appropriate and respectful way.

DCA has been pleased to note the Australian Government's recent announcements about extending the right to request workplace flexibility to a wider range of

employees than only parents with young children or children with a disability. Given the small imposition that the existing right to request provisions in the Fair Work Act have thus far made on employers, we are confident that extending this right will simply assist in initiating the cultural change required to facilitate greater access to workplace flexibility across the Australian labour market.

The National Work+Family Policy Roundtable's analysis of international evidence suggests that the right can be extended to a broader population of workers without creating difficulties for business³¹. A similar right is available to all employees in the Netherlands and Germany. Extending the right to all employees makes it simpler for employers to manage, can encourage innovation in work organisation, and can increase workplace acceptance that a wide range of employees across the labour market may need access to flexible work arrangements at some time in their working lives.

Defining disability

DCA member organisations define disability in a variety of ways. Some are of the view that the ABS definition is the simplest and most easily understood, while others have adopted the format of the Disability Discrimination Act.

Notwithstanding, members have stressed that in order to manage a variety of needs, it is not possible to treat all disabilities in the same manner or group them into cohorts. Each individual has unique issues (which may or may not include requirements for reasonable accommodations) as determined by their own circumstances and the employment context. And these issues may of course change over time. What is important is that organisations develop effective structures which can assess and address those requirements individually, but consistently.

It is also important to acknowledge that definitions of disability are developed with the aim of promoting understanding that all people have an equal and shared right to meaningful employment and respect in the workplace, regardless of ability. In this construct conditions like diabetes, arthritis or asthma would be considered disabilities.

Initiatives that make a real improvement to workplace equality for people with disability

DCA members have put forward a range of initiatives which can support greater workforce participation by people with disability. These include:

- Reasonable Accommodation Committees – formal forums representing all aspects of the business at a high level that can assess and approve accommodations for employees through a lens of enabling employee productivity versus provision of performance concessions.
- Performance concessions. of enabling employee productivity versus provision communities through active engagement with people with disability and addressing the core barrier of fear. Such interventions can include things such as Disability Etiquette & Awareness Training or experiential training, along with broader inclusion skills and leadership interventions.
- Eliminating Barriers to Access Employment Opportunities – through accessible workplace intra/internet interactions and recruitment practices.
- Mainstreaming Flexible Work Practices – so as to facilitate flexible accommodation of all employee needs for productivity and work-life balance, such that people with disability are not purported to be in receipt of “special” treatment that would not be afforded to other employees.

- Facilitated Disclosure – provision of guidance and facilitative mechanisms to support disability disclosure in a non-threatening and non-discriminative manner.
- Community Education – promotion of role models within business and education to dispel community and cultural stereotypes.

CASE STUDY

ANZ

ANZ has used a suite of strategies to both recruit and retain employees with disability. To enhance the recruitment process for people with disability, ANZ has:

- Provided training, resources, support, awareness and education sessions for line managers and human resources business partners about recruiting, attracting, valuing and including staff with disability.
- Set an internal target for new employees through ANZ traineeships, graduate program and permanent employees that self-disclose their disability.
- Engaged both general and specialist recruiters to support our disability employment goals and incentivise employees to help us identify more people with disability to work for ANZ.
- Through the Abilities Network, engaged existing ANZ staff to volunteer to liaise on ANZ's behalf with disability employment providers, disability groups, professional organisations and recruitment companies to source suitable candidates with a disability; interview potential candidates; actively searching for employment opportunities within ANZ; and on-board successful candidates.

ANZ has a number of strategies for the retention of employees with disability, which include:

- Adopting the Reasonable Accommodation Kit which provides ANZ Managers with access to resources about disability and the appropriate provision of reasonable accommodations. It also directs managers to all existing disability resources within ANZ, along with relevant external resources.
- Ensuring ANZ communication tools, templates and presentations meet accessibility requirements.
- Improving internal technology systems and platforms to ensure they are accessible to all employees.
- ANZ are currently working to ensure that a focus on disability or caring responsibilities is incorporated into the policies they have around flexibility.
- Providing flexibility in hours and working conditions to ensure employees with disabilities are supported in the workplace.

Partnerships to support employees with disability

DCA members engage in a variety of partnership arrangements to provide greater support to their employees with disability. The following illustrate some of these partnerships.

Springboard LLC

Springboard LLC is a consultancy specifically targeted at supporting organisations to become more effective in their engagement of people with disability. As such we internally:

- Partner with a university to ensure accessibility of our online content and the content of our clients;
- Maintain alliances with public, private and non-profit organisations around the world that assist people with disability to actively engage with; and
- Support employees and employers to create inclusive workplaces that facilitate effective disclosure.

The Australian Taxation Office and Stepping into... program

The Australian Taxation Office are looking to attract and retain an increasing number of people with disability into areas of operations where they can provide relevant and desirable careers as well as enhance services to clients in the community with disability. The ATO is working with the Australian Network on Disability on the *Stepping into...* program. This program offers university level students with disability opportunities to undertake work experience. During their placement, students are provided with support and encouraged to develop their knowledge and skills, assisting them in the pursuit of their own personal and professional goals.

The Australian Taxation Office as a part of its Access and Inclusion Plan (formerly known as the Disability Action Plan) has been running a School to Work sponsorship program for students with a disability in the ACT since 2007, with a third intake of students due to commence in 2009. This program provides sponsorship, mentoring and work experience to students over a three-year period during school years 10, 11 and 12.

Telstra

Telstra Corporation recently won the Excellence in Improving Employment Opportunities Award at the National Disability Awards in acknowledgement of its successful Supported Workforce Program. This initiative currently partners with 13 Australian Disability Enterprises (ADEs) nationwide to provide ongoing employment for more than 200 people with disability.

Department of Immigration and Citizenship

The Department of Immigration and Citizenship seeks to attract and retain employees with disability as an underrepresented employment group in a tight labour market.

The key areas being focused on to this end are:

- Supporting the decision of employees and potential employees with disability to disclose their disability.
- Providing targeted recruitment opportunities.
- Ensuring our workplaces are accessible and barrier free for people with disability.

In partnership with Australian Network on Disability, the department provides disability awareness training to Independent Committee Members who provide advice to recruitment selection panels.

Thirty Independent Committee Members were trained in 2008 resulting in increased awareness of disability issues, and improved capacity to accommodate the needs of people with disability during the recruitment process.

Data collection in relation to employees with a disability

Issues of forced or coerced disclosure can clearly present difficulties for employees and jobseekers with a disability and leading practice organisations ensure that self-disclosure is encouraged within a supportive environment.

Management of self reported disability data (and data on other diversity dimensions) is generally captured through organisations' HR information systems in which employees who choose to list personal details such as their ethnic and cultural background, the languages they speak and, if relevant, their type of disability can be captured. Clearly this is helpful in tracking progress in meeting disability and diversity targets, but can vary enormously depending on the context in which that data is collected and with the culture of an organisation.

Some organisations are also beginning to track self reported disability in their leadership programs or talent pipelines which is an encouraging development.

Organisations often also capture and assess disability (and other diversity) data (particularly at an aggregate and anonymous level) through employee engagement surveys. While these may in theory offer a better assessment of the levels of self reported disability, they are of course voluntary.

Disclosure and reporting arrangements

While DCA members encourage disclosure of disability, none have indicated support for a mandatory disclosure regime. All the organisations we have spoken to have emphasised that disclosure of disability must remain voluntary. Springboard LLC, which works specifically in the disability space, employs a proprietary tool to facilitate managed and planned disclosure within organisations. This tool provides the guidance employees and companies need to ensure an effective disclosure that results in meaningful support and engagement of the employee as a highly productive contributor to the business.

In a best practice environment, a framework is established to ensure the individual has full control over the disclosure process and that employers have in place, mechanisms to ensure positive and facilitative, non-biased responses to disclosure, including privacy assurances, formal processes for assessment of accommodations or assistance and methods of merit/performance based promotion, training and advancement agenda. Leading practice organisations advocate a voluntary approach to self-disclosure by employees with disability, and public targets for recruitment of people with disability externally. Industry experience indicates that the best results are achieved by fostering inclusive and diverse workplaces.

Consequentially, it is difficult to envisage how an external reporting regime might operate. Clearly such a scheme which aims to provide publically transparent data for companies on indicators relating to their employment of people with disability could only be accurate if employees within those companies are effectively mandated to disclose their disability to their employers. As such, there is not support for a quota system

Self reporting and comparison measures which currently exist through mechanisms such as the Dow Jones Sustainability Index, corporate responsibility reporting frameworks and industry recognition programs are already seen to be helpful in

encouraging businesses to improve employment opportunities and support provided to employees with disability.

The risks & benefits of disclosure and reporting arrangements

Any system which requires forced disclosure impinges upon the rights of the individual to maintain a choice and determine the relevance of disclosure in relation to their own individual situation. It also assumes the highest level of trust and integrity exists in the workplace environment, from managerial attitude and maturity to system integrity to maintain privacy. As a course of action, the negative consequence that removes control from the individual would be unacceptable.

There are many, complex reasons why a person may choose not to disclose their disability in their place of employment. To encourage greater disclosure it is essential to ensure both the privacy of a person's details and to ensure the support and understanding of the person's peers and managers and a focus on developing a supportive and inclusive culture. For example, networks of employees with disability can act to provide mentors and a peer-based support system to employees with disability and can encourage voluntary disclosure.

Industry experience with employees with disability suggests to date, that successful policies focus on building awareness and capabilities within the workforce whilst protecting the right of the employee with disability to maintain their choice over disclosure in most circumstances.

Introducing disability employment disclosure arrangements could potentially improve the employment of people with disability, but only if appropriate guidance could be provided to the individuals on how, when and where to do so, in order to eliminate the typical fears associated with disclosure and only when coupled with guidance provided to employers on how to respond in a respectful and appropriate manner. At this point in time such a move may be premature.

Privacy arrangements remain a significant concern in relation to disclosure of disability. A leading practice for disclosure is to use a disclosure tool such as that mentioned previously, but also to have policies for where such information/records are stored (independent of personnel files), how the information will be used and when, and then to have such policies communicated widely.

Organisations should indicate that unless permitted by law, information about an employee with disability is confidential and is never disclosed without the consent of the employee.

If the disclosure is to be made for the purpose of requesting an accommodation, then standard practices must be established to ensure the end-to-end process is fair and equitable across the enterprise.

Evidence from member organisations suggests that employees continue to experience these challenges with disclosure, particularly when their employer had not addressed the issues of organisational readiness – i.e. that appropriate guidance and training was not in place to avoid disclosure problems and ensure a supportive managerial and cultural environment for people with disability.

Resolving disclosure problems requires an interactive process that lays out the steps for a documented resolution typically between an HR professional and the individual with the disability. This then needs to be followed by implementing the practices and programs that can create better working environment for people with disability (such as company values, awareness and etiquette in the workplace, recruitment, advertising, onboarding etc).

Difficulties also arise in relation to reporting arrangements where a sample group is small. For example, reporting on remuneration of people with disability at a senior executive or board level would likely mean that individuals could be readily identified.

Proposed disclosure & reporting arrangements

Due primarily to concerns about mandatory disclosure, DCA members do not support public reporting arrangements in relation to numbers of employees with disability and seniority.

It is also important to recognise that the majority of people with disabilities may not ever require an accommodation so the purpose of collecting data must be considered carefully.

However, greater transparency about organisations' enabling mechanisms such as policies, practices and technology, may be more effective. Reporting on employer activities such as the following will drive toward inclusion and creation of a positive work environment to create pull for people with disability, rather than toward a "tick in the box" forced disclosure method of reporting. Initiatives which could be reported could include:

- The mechanisms in place to support people with disability;
- The efforts undertaken to improve accessibility;
- Workforce training to assist the integration of employees with disability (e.g. awareness and etiquette training);
- The frameworks available to deliver appropriate accommodations for people with disability;
- Recruitment campaigns which engage people with disability; or
- Provision of training, development and advancement of people with disability.

In general, DCA members agree that consultation with employees is always sound practice – whether on a formal or informal basis.

Quotas

While there is strong support among DCA members for mechanisms which improve the employment participation of people with disability, there is a perception that quota schemes are unlikely to be effective. Members are of the view that quota schemes are in place across many countries but show mixed signs of effectiveness. In part this is a consequence of the relative costs of compliance – in many cases non-compliance is a cheaper operational cost and compliance is not enforced in any meaningful manner.

Quotas also tend to rely upon the forced disclosure of disabilities and simple quantification of people with disability in employment would be erroneous and invasive upon the rights of the individual and previously outlined.

Quotas may also fail to promote representation of people with disability at all hierarchy levels and seniority across a breadth of industries, and simply be limited to low skill, menial work with little or limited promotional prospect.

ANZ has recently been partnered with the Melbourne Business School's Centre for Ethical Leadership, which has specifically researched the impact of targets versus quotas for women in business. While these results consider quotas only in relation to women not other groups such as people with disability, the results are informative. The report of the project recommends:

1. *The setting of [gender] targets for the leaders of work units within organisations, particularly at top executive levels. Targets should be linked to performance and to "at risk/variable" remuneration.*
2. *Annual public reporting by organisations on number of [women in leadership roles], and the strategies implemented to increase the number of [female leaders] and the impacts of these strategies on attitudes, culture and performance.*³²

Leading Practice Case Studies

ANZ

ANZ's Disability and Diversity strategy recognises the value and strength that a diverse and inclusive workforce provides to the ANZ business.

ANZ has sought to provide leadership on improving the support systems and inclusiveness for employees with disability. Under the framework of the ANZ Disability Action Plan, we provide a range of resources and programs to support staff with a disability, their line managers, and other staff who need disability resources.

ANZ launched our first Disability Action Plan (DAP) in 2005. A second and third DAP were launched in 2007 and 2010. ANZ is undertaking a review of the current DAP which will include a strengthening of our commitments related to employees with disability.

ANZ's 2010-12 DAP included 24 commitments to work towards greater support and inclusion for people with disability, both within ANZ and in the broader community. In relation to employment, the ANZ 2010-12 DAP included commitments to:

- Review ANZ's flexibility policies and practices to ensure they reflect the needs of employees with disabilities and carers
- Ongoing improvement and availability of mental health and wellbeing information, services and education
- Review and enhance ANZ's employment processes and practices to successfully recruit, onboard, promote and support people with disability and their line managers
- Ensure ANZ communication tools, templates and presentations meet accessibility requirements
- Improve internal technology systems and platforms to ensure they are accessible to employees
- Partner with an external body to provide mentoring opportunities for university students with a disability.

ANZ's Corporate Responsibility and Diversity Committee, which is made up of senior ANZ executives and headed by CEO Mike Smith, has also set a target to "help increase the social and economic inclusion of traditionally excluded groups and those from disadvantaged backgrounds, by offering 230 roles through traineeships, graduate program and permanent employment."

ANZ has made significant progress through the DAP to promote and support the employment of people with disability, including:

- ANZ has employed 131 people with a self-disclosed disability since the commencement of our Abilities employment program in 2008 with a retention rate of 74%
- ANZ employed 38 people with disability in 2012 compared to our target of 35
- ANZ continues to operate a dedicated hotline to advise and assist employees with accessibility needs and concerns
- ANZ holds training sessions throughout the business to increase awareness of mental health issues in our workplace and ensure all employees with disability have access to appropriate physical and online resources to perform their role
- ANZ has a dedicated resource for applicants with disability to make recruitment and post placement easier
- ANZ has a buddy program for new starters with disability to help them find their feet while creating an inclusive and friendly environment
- ANZ has also set up the Willing & Able Mentoring Program (WAM) through our ANZ Abilities Employee Network as part of our Corporate Responsibility program which matches job seekers or tertiary students who have a disability with a mentor in leading organisations in their field of interest.

While ANZ has been widely recognised as having a successful and advanced plan for supporting employees with disability, we believe there is always more that can be done.

One of the real benefits of our DAP has been the opportunity to set targets, review progress and understand and address root causes preventing the employment and advancement of more people with disability.

The ANZ DAP was also reviewed by the Australian Network on Disability in 2012 which, together with a self-assessment, identified a number of areas for improvement including:

- Surveying employees to better understanding the prevalence of the ANZ workforce with disability beyond those willing to self-disclose
- Developing a strategy for targeting and attracting employees with disability
- Review the recruitment process to address any conscious or unconscious bias relating to people with disability.

Our forthcoming DAP directly responds to these insights and assessments. For example, we have set the following objectives in the area of disability employment and support:

- Promote ANZ's flexibility policies and practices to support the needs of employees with disabilities and carers
- Provide resources, support, education and awareness sessions on attracting, valuing and including staff and customers with disability
- Employee at least 35 people with a self disclosed disability per year across our business through our traineeships, graduate program and permanent recruitment
- Engage general and specialist recruiters to support our disability employment goals and incentivise employees to help us identify more people with disability to work for ANZ

- Develop a comprehensive portal on our intranet covering policies, initiatives, tools, training, templates and resources available to support customers with disability; and employees with disability and their managers
- Adapt and extend our Willing and Able and Juno Mentoring programs to support potential employees with disability globally
- Survey employees to better understand the number of ANZ employees with disability in our business; their level of engagement and inclusion; and identify opportunities to improve their work experience at ANZ
- Increase awareness and understanding amongst ANZ staff and customers of our Disability Action Plan and commitment to welcoming and supporting people with disability
- Achieve a 100% increase in membership of our Abilities network and more effectively leverage the network to help our customers and employees with disability to progress
- Support extension of the Abilities Network across the region and globally
- Support external national disability agenda/awareness campaigns and share our experience with other employers to encourage more private sector jobs for people with disability.

Australia Post

In a proactive and public commitment to improving access to employment and development opportunities for Australians with a disability, Australia Post celebrated International Day of People with a Disability in 2012 by launching its first Accessibility Action Plan.

As one of Australia's largest community based organisations, Australia Post provides essential services for all Australians everyday. This means, as a business we need to continually adapt and evolve to provide secure products and services that are relevant to how people live and work and importantly, are accessible in both the physical and digital worlds.

With approximately one in five Australians having a disability, Australia Post understands disability touches all aspects of our business – our people, our customers, our suppliers, and the community in which we operate.

Our Accessibility Action Plan is our proactive and public commitment to taking a lead role in improving accessibility for all Australians with disability and their carers.

Our Plan aims to improve the overall quality of life for people with disability by contributing to greater workforce participation and making accessible, our products and services that play a vital role in people's everyday lives.

Australia Post has had a long-standing commitment to providing equal employment opportunities for people with disability. The organisation strongly believes a diverse and inclusive workforce, in which the unique contributions of our people are leveraged, is critical to our success as an organisation, and more broadly, improving Australia's economy and living standards.

Australia Post's first Accessibility Action Plan further advances our commitment and marks an important time in our history. As part of our Future Ready program we are making significant investments in our business so we are more innovative, agile and responsive.

Never before have we been in a better position to support the building of more inclusive and vibrant communities, offering our customers more accessible options to meet their varied needs.

The Accessibility Action Plan focuses on improving accessibility for our three core stakeholder groups:

- Our people: enhance our attraction, recruitment and retention of people with disability by proactively improving access to employment and ongoing development opportunities within an inclusive work environment.
- Our customers: better connect with our customers through providing accessible products, services and facilities both physically and digitally.
- Our community: support the building of more inclusive and vibrant communities by creating opportunities for greater participation for people with disability and their carers.

In these areas key actions include:

- Diversity awareness: Continuing to build an inclusive culture by enhancing our people's level of disability awareness.
- Talent sourcing and recruitment: Attracting and recruiting candidates from a diverse talent pool and improve the accessibility of our end-to-end recruitment process.
- Learning and development: Ensuring our learning and development programs & activities are accessible to people with disability.
- Internal communication: Enhancing our internal communications to ensure that they are accessible to all employees.
- Product and service development: Considering the voice of the customer and the accessibility requirements of people with disability in the design of our product and services.
- Property: All new facilities to be accessible for our customers and people and upgrading of older facilities where feasible.
- Website and digital assets: Enhancing our corporate internet site and other digital assets to make them more accessible.
- Parcel delivery: Improve our parcel delivery services for people with disability and their carers.
- Marketing material: Improving the accessibility of our marketing material and
- Providing our customers with greater access, convenience and choice in the way they transact with Australia Post.

NAB

National Australia Bank (NAB) launched its 2012-14 Accessibility Action Plan in December 2012, outlining a clear strategy to provide more effective long-term support and access for employees and customers with a disability.

NAB is committed to creating and maintaining a workforce which is representative of our customers and communities and where individual differences are valued, respected and understood.

The Plan demonstrates how we are developing an inclusive culture to help remove the barriers to access that exist for employees and customers with a disability.

The Plan has identified five key objectives to further develop an inclusive culture and to remove barriers that exist for people with disability:

1. Improving access to our premises and financial services for our customers and our people
2. Considering the needs of people with disabilities in the development of our products, services and marketing.
3. Increasing awareness, knowledge and confidence of our people to enable improved service for customers with disabilities, and to provide a supportive and inclusive workplace.
4. Enabling our people with disability to realise their potential by creating an inclusive and supportive culture.
5. Increasing awareness of disability in the community, while providing continued support through our community engagement programs.

NAB was the first Australian bank to make a public commitment to eliminate discrimination in its services by lodging a Disability Action Plan with the Australian Human Rights Commission in 1997. The aim was then, and remains, to improve access for all people who have a disability.

ENDNOTES

- ¹ Commonwealth of Australia. (2010). *Australia to 2050: Future Challenges. The 2010 Intergenerational Report*, Canberra.
- ² Australian Chamber of Commerce and Industry. (2010) *It's Not About Age, Pathways For Engaging Mature Aged People & Existing Workers As Apprentices*, Accessed at: <http://www.acci.asn.au/Research-and-Publications/Issues-Papers/Human-Capital/It-s-Not-About-Age>
- ³ Australian Bureau of Statistics *(2011). *Disability, ageing and carers, Australia: Disability and long term health conditions, 2009* (No. 4433.0). Canberra: ABS.
- ⁴ Graffam, J, Shinkfield, A, Smith, K, and Polzin, U (2002). 'Employer benefits and costs of employing a person with a disability', *Journal of Vocational Rehabilitation*, vol. 17, pp. 251-263.
- ⁵ Noble, J. (1999). *Entrepreneurial Research Project conducted on behalf of Telstra*. Telstra Australia
- ⁶ Graffam, J., Shinkfield, A., Smith, K., & Polzin, U. (1998). Making it work; Employer outcomes when employing a person with a disability. Melbourne; Institute of Disability Studies, Deakin University.
- ⁷ Graffam, J, Shinkfield, A, Smith, K, and Polzin, U (2002). 'Employer benefits and costs of employing a person with a disability', *Journal of Vocational Rehabilitation*, vol. 17, pp. 251-263.
- ⁸ Graffam, J, Shinkfield, A, Smith, K, and Polzin, U (2002). 'Employer benefits and costs of employing a person with a disability', *Journal of Vocational Rehabilitation*, vol. 17, pp. 251-263.
- ⁹ Graffam, J., Shinkfield, A., Smith, K., & Polzin, U. (1998). Making it work; Employer outcomes when employing a person with a disability. Melbourne; Institute of Disability Studies, Deakin University.
- ¹⁰ Australian Safety and Compensation Council. (2007). *Are People with Disability at Risk at Work?* Canberra: Australian Government Department of Employment and Workplace Relations.
- ¹¹ Kohlbacher, F. (2013). 'The Business of Aging'. *AGEnda Aging and Work Blog*, February 20th, 2013, Sloan Center on Aging & Work, Boston College. Accessed at: <http://agingandwork.bc.edu/blog/the-business-of-aging/>
- ¹² Brooks, R. (2004). *The Price of Discrimination: An Economic Analysis of the Human Rights and Equal Opportunity Commission Rulings 1985-2000*. Accessed at: http://findarticles.com/p/articles/mi_m0PAO/is_3_23/ai_n6201943
- ¹³ Australian Human Rights Commission. (2008). *Federal Discrimination Law Online, June 2008*. Accessed at <http://www.hreoc.gov.au/legal/FDL/index.html>
- ¹⁴ Australian Human Rights Commission. (2003). *A Bad Business: Review of Sexual Harassment in Employment Complaints 2002*. Accessed at: http://www.hreoc.gov.au/sex_discrimination/workplace/bad_business/media/fact_cost.html
- ¹⁵ VicHealth. (2007). *More than Tolerance: Embracing Diversity for Health*. Accessed at: [http://www.vichealth.vic.gov.au/assets/contentFiles/DCASv2%20\(4\)%20-%20FINAL%20060907.pdf](http://www.vichealth.vic.gov.au/assets/contentFiles/DCASv2%20(4)%20-%20FINAL%20060907.pdf)
- ¹⁶ Siperstein, G. N., Romano, N., Mohler, A., & Parker, R. (2006). 'A national survey of consumer attitudes towards companies that hire people with disabilities.' *Journal of Vocational Rehabilitation*, 24(1), 3-9.
- ¹⁷ Wright, P.M., Ferris, S.P., Hiller, J.S. & Kroll, M. (1995). 'Competitiveness through management of diversity: Effects on stock price valuation'. *Academy of Management Journal*, 88: 272-287.
- ¹⁸ Australian Bureau of Statistics. (2011) *Disability, Australia, 2009* (No. 4446.0). Canberra: ABS
- ¹⁹ Australian Institute of Health & Welfare (2008) *Disability in Australia: Trends in prevalence, education, employment and community living*.
- ²⁰ Australian Bureau of Statistics (2010). *Disability, ageing and carers*. (No. 4430.0). Canberra: ABS
- ²¹ Australian Institute of Health & Welfare (2008). *Ibid*
- ²² Australian Bureau of Statistics (2013). *Gender Indicators, Australia, 2013*. (No. 4125.0). Canberra: ABS
- ²³ Organisation for Economic Co-operation and Development (OECD) (2003). *Transforming disability into ability: Policies to promote work and income security for disabled people*. Paris: OECD.

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- ²⁴ Commonwealth of Australia. (2011). *2010–2020 National Disability Strategy: An initiative of the Council of Australian Governments*. Canberra: Commonwealth of Australia.
- ²⁵ Australian Bureau of Statistics. (2011). *Disability, Australia, 2009*. (No. 4446.0). Canberra: ABS
- ²⁶ Women With Disabilities Australia (WWDA). (2005). *Submission to the HREOC National Inquiry into Employment and Disability*. Accessed at: <http://www.wwda.org.au/employsub2.htm>
- ²⁷ Women With Disabilities Australia (WWDA). (2004). *Submission to the HREOC - Request for comments on the possible public inquiry on employment and disability issues*, Accessed at: http://humanrights.gov.au/disability_rights/employment/responses_rfc.htm
- ²⁸ Australian Bureau of Statistics. (2012). *Labour Force Characteristics of Aboriginal and Torres Strait Islander Australians, Estimates from the Labour Force Survey, 2011*. (No. 6287.0). Canberra:ABS
- ²⁹ Australian Bureau of Statistics. (2010). *The Health and Welfare of Australia's Aboriginal and Torres Strait Islander Peoples 2008*. (tNo. 4704.0). Canberra:ABS
- ³⁰ Australian Bureau of Statistics. (2011). *Disability, Australia, 2009*. (No. 4446.0). Canberra: ABS
- ³¹ Work+Family Policy Roundtable, 2012, Submission to The Fair Work Act Review Panel, Accessed at: <http://www.deewr.gov.au/WorkplaceRelations/Policies/FairWorkActReview/Documents/WorkandFamilyPolicyRoundtable.pdf>
- ³² Whelan, J. (2012). *Targets and Quotas for Women in Leadership: A Global Review of Policy, Practice, and Psychological Research*. Melbourne: Melbourne Business School, University of Melbourne.