



2nd December 2015

The Hon. Susan Ryan AO
Age and Disability Discrimination Commissioner
Australian Human Rights Commission

By email: ageanddisabilityinquiry@humanrights.gov.au

Re: Willing to Work: National Inquiry into Employment Discrimination against Older Australians and Australians with Disability

Dear Commissioner,

Please find following Diversity Council Australia's views in response to the above Inquiry.

As you are aware, DCA is the independent, non-profit workplace diversity advisor to more than 300 organisations across the private and public sector – many of whom are among Australia's largest and leading employers. DCA is a business council whose member organisations are estimated to employ more than one million Australians, representing around 10 per cent of the Australian workforce.

In partnership with our member organisations, our mission is to:

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

The issue of employment discrimination and barriers facing older Australians and Australians with disability is one which is of major interest to DCA and our members and we welcome the opportunity to participate in this dialogue. As you are well aware, these issues are increasingly important to Australian employers given the changing demographics of our workplaces and communities.

Thank you for the opportunity to provide this input and for your assistance in hosting the roundtable with DCA members on 27 October.

Please feel free to contact myself or DCA's Policy and Research Manager Jo Tilly on 0432 561 232 should you require any further information about this submission.

Yours sincerely

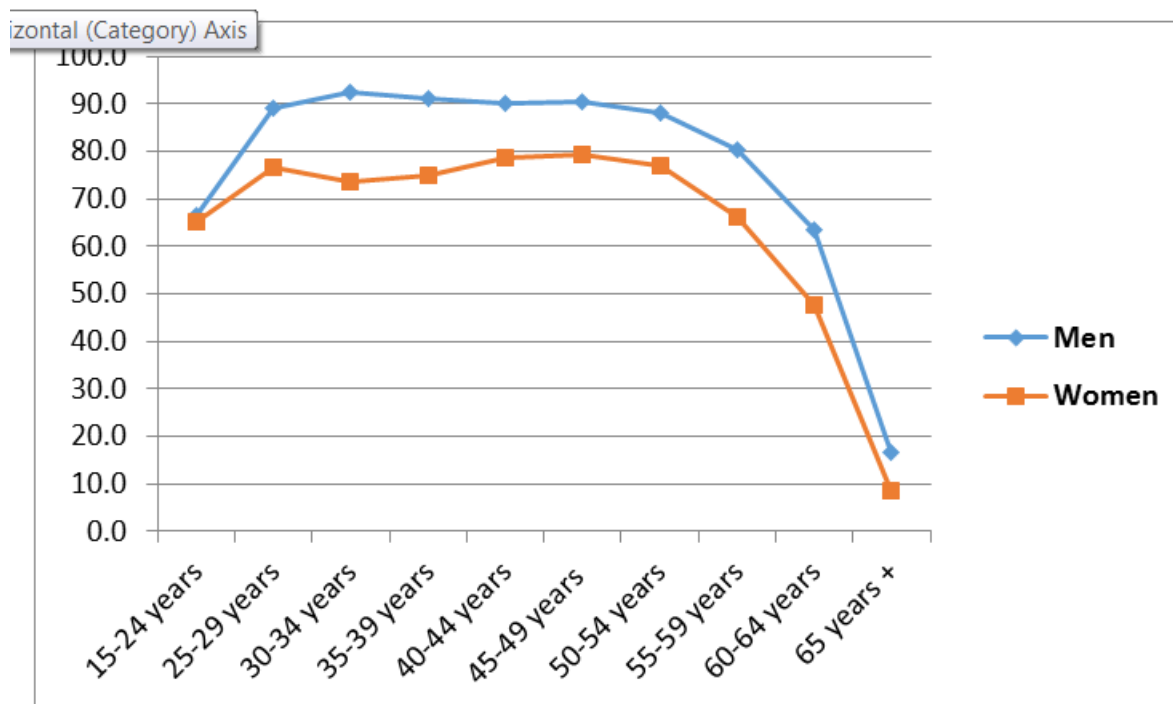
Lisa Annese
Chief Executive Officer

1. A snapshot of employment of people with disability and older people in Australia

As the Issues Papers for this Inquiry have highlighted, older people and people with disability participate less in employment than other Australians and people with disability in particular continue to experience extremely poor outcomes in terms of their participation in mainstream employment.

Older people participate in the labour market at lower levels than their younger counterparts, especially in the over 55 age groups.

Australian Labour Market Participation Rates by Age, September 2015



Source: ABS, *Labour Force, Australia, Detailed - Electronic Delivery, Sept 2015*

The situation for Australians with disability is even more dire with ABS statistics¹ showing a current labour force participation rate for people with disability (aged 15–64 years) of close to 30 percentage points lower than other Australians. Current labour force participation rates for people aged 15 -64 years stand at 56.6% for men with disability compared to 88.5% for men without a disability, and labour force participation for women with disability only 49%, compared to 76.5% for women without disability.

It must be noted that such poor employment participation by people with disability relates not only to the characteristics the workplace, but must be considered 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.

As the Commission has indicated, approximately one in five Australians has one or more disabilities. This number has been increasing, in absolute terms, and as a proportion of the

population. Since 1981 and 2012, the number of people with disability increased from 1.9 million (15.3% of the population) to 4.2 million (18.5%)². 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 disability.³

Despite this increase in the prevalence of disability in the community, it is particularly disturbing to note that the gap in employment participation has remained persistent over the three decades.⁴ This compares unfavourably to women's workforce participation which increased substantially over the same period, from 44.5% in 1981 to more than 59% today⁵.

Also noteworthy is Australia's appalling international ranking in this area, as noted in the Issues Paper. In 2010 (in the most recent assessment), the Organisation for Economic Co-operation and Development (OECD) ranked Australia 21st out of 29 member countries in the employment participation of people with disability.⁶ Further, Australia ranked 26 out of 27 OECD countries in the percentage of people with disability living in poverty. This translates into approximately 45% of people with disability in Australia living near or below the poverty line.⁷ The OECD has emphasised that employment rate for people with disability is particularly 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 (in the *Fair Work Act*), there remains clear evidence about the frequency of disability discrimination in the workplace.

The fact that in 2013–2014, disability discrimination accounted for the largest group of complaints received by AHRC (38%)⁸, with a third of these relating to discrimination in employment, suggests that more attention is needed to drive equality in employment for people with disability.

2. People with Disability & Older People:

The business case for inclusive workplaces

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

In a tight labour market, employers are increasingly realising 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. These issues of recruitment and retention are becoming even more critical in the context of the ageing of Australia's labour market.

The demographic imperative

As the Discussion Papers have highlighted, 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 2015 Intergenerational Report⁹ estimates that the number of people in Australia aged over 65 will more than double over the next 40 years, with the number of people aged 85 years or more increasing to close to 5% of

the population. The Report projects that participation rates among those aged 65 will increase strongly, from 12.9% in 2014-15 to 17.3% in 2054-55.

And it is not only those who we might now consider to be of retirement age that will need to increase their workforce participation to sustain the Australian economy. 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.¹⁰

The consequence is that there is a strong imperative for both government and business to keep mature age people in the workforce for longer. While increasing population health and active ageing mean many of these older people will experience few restrictions on their continued workforce participation, it is important to also acknowledge that with ageing, many people will experience increased incidence of disability. ABS statistics indicate that there is a strong relationship between age and disability. In the last survey, 3.6% of those aged four years and under were affected by disability, compared with 18.1% of those aged 45-54, 39.5% of those aged 65-69 years and 85.9% of those aged 90 years and over.¹¹

Productivity & Participation

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.¹²

Other surveys have found similar results. Industry research conducted on behalf of Telstra Australia found that:

- over a 15 month period, people with disability had 11.8 days absent, compared to people without disability who had 19.24 days absent; and
- there were no significant differences when comparing people with disability to people without disability in the areas of performance, productivity and sales.¹³

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.¹⁴

Considering all potential employees, regardless of age or 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. 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 represents 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.¹⁵

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.¹⁶

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 employees¹⁷. 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 OH&S 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 OH&S incidents and have lower workers' compensation costs, in comparison to other employees".¹⁸

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

According to a recent report¹⁹ from [Fifth Quadrant Analytics](#), people with disability comprise an enormous market – approximately 1.3 billion people worldwide – on par with the population of China. When combined with their friends and family, this group grows to 2.2 billion people, who control over US\$8 trillion annually in disposable income.

In Australia, the approximately four million people with disability have a combined disposable annual income of around AU\$54 billion. One in three Australians either has disability, or is close to someone who does. With our ageing population, this figure is only set to increase.

Despite the size and spending power of this group, many mainstream businesses still fail to recognise people with disability as an emerging market. Employing people with disability and developing accessible products and services for people with disability, is still more often than not thought of as optional thing rather than just good business, and many organisations fail to see the link with improved business performance.

There has, however, been a greater focus on market opportunities presented by older consumers. Recent international research highlights that while businesses are increasingly focusing on the “silver market” (i.e. 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 wealthy 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.²⁰

Legal obligations and risk management

Meeting legal obligations and managing risks are important business considerations. 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 compensation award under the Disability Discrimination Act (between April 2000 and August 2009) was \$19,002.70.²¹ However it should be noted that many damages awarded are considerably higher – for example in a number of recent disability discrimination cases (*Gordon v Commonwealth* [2008] FCA 603 and *Maxworthy v Shaw* [2010] FMCA 1014) damages totaled \$121,762 and \$63,394.50 respectively.²²
- Turnover associated with complaints is also common, resulting in significant cost to employers. 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 workplaces²³. 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 illness²⁴.

Enhancing corporate reputation

As well as these financial advantages of preventing discrimination and enhancing workplace inclusion, employing older people and people with disability can have significant benefits in terms of an organisation's corporate reputation in a competitive market. Being seen as an employer of choice 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 one University of Massachusetts survey, 92% of the American public viewed companies that hired people with disabilities more favourably than those that did not; 87% of the public also agree that they would prefer to give their business to companies that hire people with disabilities.²⁵

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 days²⁶.

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.

3. Barriers to employment of older people and people with disability

3.1. Discrimination & Legal Protection

Unlawful discrimination in employment towards people with disability and older people is significant, as indicated by the Issues Papers, both in terms of formal complaints of discrimination lodged with the Commission and in other jurisdictions, and as indicated by prevalence surveys.

DCA's own research has also found employment discrimination by older people and people with disability is frequently reported.

One area that deserves particular attention is the area of intersectional discrimination. When age, gender, disability, caring responsibilities and other characteristics such as cultural diversity, class or diverse sexuality combine, workplace discrimination is especially prevalent. DCA's *Working for the Future* research (2011) found that older female workers are experiencing a potentially negative workplace culture in which they experienced potential discrimination on the basis of age, gender, family and disability. To illustrate, older women's reports of age discrimination, gender-based discrimination and discrimination on the basis of family responsibilities were all higher for those who had a disability. While 17% of older women overall reported having experienced age discrimination at work, this figure was notably higher for older women who had a disability (32%). The same trend was apparent in relation to discrimination on the basis of family responsibilities (5% older women overall versus 15% older women with a disability) and of gender (8% older women overall versus 17% older women with a disability).

In terms of improvements that could be made to the current system, DCA continues to support consolidation of federal anti-discrimination law, accompanied by states and territories agreeing to a national anti-discrimination framework by way of conceding to a federal act. A national legal framework for anti-discrimination is an important step to ensuring individuals across the country have access to equal protection under the law and would enable businesses to better comply with their legal obligations. It would also offer an opportunity to maximise community and business engagement with the issues of unlawful discrimination.

DCA members, as primarily large employers, have indicated that understanding their legal obligations with respect to unlawful discrimination is relatively straight forward, and their greater challenges lie in the areas of unconscious bias and creating sustainable inclusive cultures. There is no doubt that these issues are significant. DCA is developing a body of work focused on building inclusive workplaces including our recent research report [*Building Inclusion - An Evidence-Based Model of Inclusive Leadership*](#). Such work is vitally important in not only decreasing discrimination, but reducing the impact of biased culture.

DCA is also of the view that compliance and complaints mechanisms for older people and people with disability could be improved through better clarifying the distinction between discrimination, harassment and bullying in order to reduce community confusion about these behaviours and their legal definitions. It is DCA's experience that the differences between these behaviours are not well understood in the general community, nor are the respective legal jurisdictions that cover each. Clarifying this distinction for individuals and assisting the

business community to understand their rights and responsibilities with regard to workplace bullying would be valuable. This view has been strongly supported by DCA members.

Should the government wish to increase business compliance in respect of existing anti-discrimination laws, resources might be best directed toward assisting small and medium sized enterprises.

3.2. Other Barriers

However, older people and people with disability face a range of other barriers to employment. Some of the barriers identified by DCA members include:

- 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 – 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.
- Organisational expectations of disclosure of disability which 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.
- A lack of understanding from peers and managers and pre-conceived ideas regarding 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.
- Concerns about costs – Individual employers and recruiters can have perceptions that hiring people with disability will require an expensive and extensive financial demand for equipment and workplace modification. Further, employers can have a mindset that disability implies lower levels of performance and capability or that disability equates to extreme physical or mental limitations.
- Non inclusive cultures and biases within workplaces which 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. 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.
- Shifting the mind set and bias around what people with disability can do is a huge challenge. Developing a safe and inclusive culture, where people's differences are not seen as potentially career limiting is hard to achieve in many organisations.

- Requirements of Occupational Health and Safety (OH&S) and workers' compensation schemes – Currently the legislative framework for OH&S and workers' compensation places onerous demands on employers who allow their employees to work from home. As knowledge based work increases, and the technologies enabling home based work improve, there is ever increasing opportunity for employers to tap into the currently untapped market of talented people with disability and other employees who wish to work flexibly. The current legal responsibilities on employers where staff work from home (for example, being responsible for the air quality of a person's house) significantly discourage employers from permitting home based working. The Commonwealth should take action to create a more reasonable legislative framework for encouraging flexible working at home and encourage greater flexible employment for people with disabilities, older workers and carers.

3.3. Diverse older people & with people with disability

Clearly, the specific needs, priorities and perspectives of older people and people with disability in relation to their employment are based on every individual's personal circumstances, including the type and level of support – if any – they require, their levels of education, gender, age, sexual orientation, and cultural background. Some older people and people with disability experience multiple disadvantages with gender, race and age in particular, often significantly impacting on their experience. As mentioned above, intersectional discrimination is a significant issue for many older people and people with disability.

DCA is pleased to note that the Commonwealth Disability Strategy identifies this diversity of people with disability as an important consideration.²⁷

Women

As previously noted, women with a disability are employed at lower rates than both other women and men with disability – women with disability aged 15-64 years have a participation rate of only 49%, compared to 56.6% for men with disability and 76.5% for women with no disability.²⁸

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.²⁹ Only 20% of women with a disability are employed full time, compared to 39% of women with no reported disability and only 37.8% of men with disability are employed full time, compared to 71.4% of men with no disability.³⁰

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 not only are participation rates for women with disabilities 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.³¹

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.³²

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.

Lack of access to workplace flexibility is also among critical barriers to greater workforce participation for older women. The National Seniors Centre for Productive Ageing estimates that the lack of flexibility of workplace arrangements for care-givers and people with illness results in a loss of over 1 million hours each week from part time older female workers and 2.4 million hours from older women who are not in the labour force.³³ Strong government promotion of workplace flexibility for these employees has potentially significant productivity implications.

Similarly, Aboriginal people and Torres Strait Islanders with a disability experience far greater challenges in gaining and maintaining employment than other groups of older people and 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.³⁴

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.³⁵

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, asylum seekers, 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 and older people is reflected in the development of policies and programs to improve employment participation.

4. People with Disability & Older People: DCA's Research

4.1. Flexible Work and Careers

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 both older employees and employees with a disability. In addition, our current research initiative *Get Designing* is investigating work re-design and developing guidelines for employers which are likely to be of considerable interest to employers looking to improve flexibility for a wider range of employees.

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 statistics³⁶ 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. 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 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 older people, 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 extension of the right to request workplace flexibility in the *Fair Work Act* to a wider range of employees than only parents with young children or children with a disability. Extending the right to request flexible working to employees with disability, employees aged 55 or older and employed carers is an important development in supporting these groups of employees. DCA is hopeful that this will make such requests simpler for employers to manage, encourage innovation in work organisation, and increase workplace and community 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.

4.2. Older Women

DCA's *Older Women Matter* research, undertaken in 2013 found that women aged 45+ are a critical underutilised talent pool, now and into the future. Their employment participation has grown strongly over the past few decades, and they now constitute a sizeable proportion (17%) of Australia's workforce. There also remains significant opportunity to further leverage their workforce contributions. Relative to their male counterparts, older female workers have lower labour market participation rates, higher underutilisation rates and Australia's performance in this regard lags substantially behind comparable countries.

Better utilising the older female workforce has significant benefits for business, as well as the broader Australian economy and older female workers themselves.

For Business. Organisations stand to gain substantially from the greater employment participation of older women. The combined impacts of the benefits gained by both a gender and age inclusive workforce offer significant return on investment to businesses:

- Research examining older workers indicates that organisations can experience benefits associated with sustained job performance, high motivation levels, high reliability, improved staff retention and accumulation of experience, knowledge and skills over working lives; and
- Gender diversity research indicates businesses can experience a range of benefits from a workforce which is inclusive of women, including reducing attrition, enhancing innovation, group performance, access to target markets and financial performance, and minimising legal and reputational risks.

For Australia. At a national level, Productivity Commission modelling indicates that increasing older women's labour participation rates to match men's could increase per capita GDP growth to 2044-45 by 1.5%.

For older women themselves, paid work provides access to greater financial security as a consequence of having an independent source of income, as well as enhanced social support, satisfaction, self-esteem and mental and physical health. With life expectancy increasing to more than 84 years for women, and close to 70% of older female workers rating their health as good or excellent, many older female workers are at their peak. For many, this is translating into changing expectations about the trajectory of their working lives.

Smart employers are no longer making assumptions about their older workers' retirement plans and are instead ensuring they develop talent across their workforce, inclusive of all age and gender demographics.

Our review of research enabled us to generate a framework for action to assist organisations to attract, engage and retain older female workers, as well as to structure effective transitions into retirement. This framework is organised around seven key organisational enablers of older women's employment identified in our research review – sourcing talent; considering careers and capabilities; cultivating culture; getting flexible; investing in health and wellbeing; focusing on financial; and tailoring transitions – and puts forward a broad range of actions for each key enabler. In essence, these actions involve organisations looking at their existing talent management practices through a gendered age lens, to see how well these promote a workplace environment which is inclusive of older female workers.

In response to feedback from our Think Tank of leading diversity practitioners, we accompanied this framework for action with suggestions for how organisations can 'lay the groundwork' – that is, most effectively start an internal conversation and a high level of engagement around the employment of older women.

We discuss four key strategies, these being:

1. Make a compelling business case;
2. Understand the state-of-play with respect to older women's employment;
3. Emphasise the sustainable workforce of the future; and
4. Focus on inclusion.

Initiating and framing internal conversations in this way maximises engagement around older female employment, by demonstrating that a range of business benefits can be generated from creating a workplace environment which is inclusive of this critical part of the workforce of the future.

5. Initiatives that make a difference

Individual employers, peak business groups like DCA and Governments all have a role to play to encourage greater employment opportunities for older people and people with disability.

For individual employers, these include developing internal policies and support structures to ensure accessible recruitment and work practices, success and sustainability of employment for people with disability and older workers and creating safe and inclusive cultures.

DCA members have put forward a range of initiatives which can support greater workforce participation by people with disability and older people. At an individual organisational level, these can 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.
- Developing an Accessibility Action Plan and centralised Workplace Adjustment Policy and process (asking universally at recruitment and on boarding and providing an accessible way of requesting a workplace adjustment at any point during

employment) with an associated budget.

- Creating employee driven Networks for people with disability and/or older employees.
- Establishing a CEO led Diversity and Inclusion Strategy with Disability Employment and/or Mature Age Employment identified as a priority.
- Partnering with specialist organisations such as the Australian Network on Disability.
- Encouraging awareness of the issues impacting on employment of people with disability through facilitating active engagement with people with disability. 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 Disability Disclosure – provision of guidance and facilitative mechanisms to support disability disclosure in a non-threatening and non-discriminatory manner.
- Promotion of role models for people with disability and older people within businesses to dispel community stereotypes.

5.1. Adequacy of Existing Programs

Governments have a responsibility for establishing strong legislative and policy frameworks to encourage greater employment of older people and people with disability, and to provide accessible and clear guidance and resources for employers.

DCA welcomes the focus the Commonwealth has given to date on improving the social inclusion and employment outcomes of older people and people with disability. The introduction of the NDIS, the Advisory Panel on the Economic Potential of Senior Australians, work undertaken by the Australian Law Reform Commission and promotion of human rights of people with disability and older people by the AHRC and Australian Government more broadly 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 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.

While the experience of many older job seekers and those 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 Department of Education and/or the Department of Employment 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 could 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 commented that, from a large, national employer perspective, it is difficult to create a streamlined and efficient process to access the untapped talent pool.

A number of employers have highlighted difficulties with DES services as a consequence of them being predominantly small and locally run, making it difficult for a large national employer to develop an effective approach to accessing suitable candidates from talent pool within the DES Network. They have described the DES Network as cumbersome to navigate and develop relationships with due to the number of individual local services. For national employers, this means considerable time is required to develop relationships with several DES providers to enable access to a wide range of talent.

Members have commented that the National Disability Recruitment Coordinator (NDRC) offers good support for employers when starting on the journey towards becoming disability confident, however they are limited in their ability to provide practical/hands on recruitment to get employees through the door due to the current DES network structure.

In relation to Job Access, members have indicated that this program provides great support for individuals with disability in the form of workplace adjustment funding, however employers can't access funding on behalf of an individual, making it difficult to seek funding assistance for workplace adjustments prior to an individual coming on board (i.e. wanting to set someone up prior to their arrival without burdening the individual with the application process).

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

6. Good practice case studies:

DCA members building inclusive workplaces

While considerable work still needs to be done to improve the employment of people with disability and older people in Australia, many of the strategies being undertaken by our members to recruit and retain employees with a disability, represent 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:

[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 organisation] has a long-held and demonstrated commitment to attracting, valuing, including and supporting our employees with disability. In the broader context, [we] believe 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

6.1. Case Study: People With Disability at 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.

6.2. Case Study: People With Disability at Australia Post

Australia Post celebrated International Day of People with a Disability in 2012 by launching its first Accessibility Action Plan for the period 2012-15.

At last count (June 2012) Australia Post employed 2,398 people who had a disclosed disability, representing 7.3% of their total workforce.

The Accessibility Action Plan focuses on improving accessibility for the organisation's three core stakeholder groups:

- **People:** enhancing attraction, recruitment and retention of people with disability by proactively improving access to employment and ongoing development opportunities within an inclusive work environment.
- **Customers:** better connecting with customers through providing accessible products, services and facilities both physically and digitally.
- **Community:** supporting 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 people's level of disability awareness. Australia Post's Disability Awareness campaign features a short film, [Workmate](#) has been a particularly successful initiative in increasing awareness as well as being used as a training resource to raise and promote the employment of people with disability at Australia Post. Managers have been screening the DVD for their teams and using the discussion planner to encourage open conversations about inclusion in the workplace.
- **Talent sourcing and recruitment:** Attracting and recruiting candidates from a diverse talent pool and improving the accessibility of Australia Post's end-to-end recruitment process.
- **Learning and development:** Ensuring Australia Post's learning and development programs & activities are accessible to people with disability.

- Internal communication: Enhancing 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 all products and services.
- Property: Ensuring all new facilities are accessible for customers and staff and upgrading of older facilities where feasible.
- Website and digital assets: Enhancing the corporate internet site and other digital assets to make them more accessible.
- Parcel delivery: Improving parcel delivery services for people with disability and their carers.
- Marketing material: Improving the accessibility of marketing material.
- Providing customers with greater access, convenience and choice in the way they transact with Australia Post.

6.3. Case Study: People With Disability at Uber

In September 2015, Uber announced it has teamed up with an Australian start-up in an attempt to create thousands of jobs for people disability.

Enabled Employment, a labour hire company operated by people with disability for people with disability, has partnered with Uber to extend flexible economic opportunities for disabled people who are able to drive.

Uber hopes the partnership will not only help Enabled Employment members find well-paid income opportunities, but also encourage the 53% of disabled people with a driver's licence to consider driving on the UberX platform.

In a statement on the announcement Uber said, "For over four million people with a disability, facing adversity is part of everyday life. Especially when it comes to participation in the workforce. Unfortunately there are still significant barriers to earning a steady income for many people with a disability. Unemployment rates for this community are unacceptably high. This year unemployment for people with disability was twice as high as the general population and labour force participation was half that of the non-disabled workforce. At Uber we believe everyone has the right to financial independence, and flexible economic opportunities should be made available to all."

Enabled Employment CEO Jessica May welcomed the partnership and the signing of a national agreement to get more people with disability to consider becoming a driver partner with Uber. "We are delighted to be in partnership with a fellow company that is disrupting the current way we do things. Enabled Employment is proud to be disrupting the disability employment sector and bringing about social change which is why we think we are a perfect fit for working with Uber," Ms May said.

Uber are already challenging barriers around employment for people with disability by offering an extension to their app which accounts for people with difficulties in hearing or

speaking. This opens up a world of opportunities for people with disabilities to earn a flexible income as Uber-partners.

Uber offers flexible options for people with disabilities and their carers to get back into the workforce. As long as the requirements for Uber are met, people can be their own boss, work when they want, including around medical appointments or their limitations, and still earn a decent wage.

Since launching in 2009, Uber has expanded to over 330 cities worldwide and now employs over one million people around the world. Drivers use their own car to pick up customers, with more than one million riders and 15,000 driver-partners using the system in Australia alone.

6.4. Case Study: Older Workers & MyFuture at NAB

National Australia Bank (NAB) is a financial services organisation with over 43,000 people (FTE employees as at 30 March 2013) operating more than 1800 stores and business banking centres globally. Across our Australian operations, more than half of our workforce are female, 25% are aged 45 or over and 14% are women aged 45 or over.

At NAB, we are committed to creating and maintaining an inclusive culture that supports our people to reach their full potential throughout the various stages of their life. Gender equity, flexibility and the attraction and retention of older workers are key components of our diversity agenda.

Addressing the challenges and opportunities presented by an ageing population and workforce is important for NAB to meet the needs of our people and our business. We are focused on creating a culture that values the wisdom and experience of our mature age employees (defined at NAB as 50 and over) and increasing the number of women in senior roles by supporting the career progression of our female employees.

With this in mind, NAB undertook a robust business case to examine our age workforce profile, seek qualitative feedback from older workers and to understand internal drivers, the external landscape and key risks and opportunities. Following this, we launched our mature age initiative, MyFuture, which supports our mature age workforce, and their managers, in preparing for the future.

NAB partnered with Sageco, age management specialists, to tailor our MyFuture program and associated resources to ensure sustainable change was created across:

- Capability: Improving employee and management capability through MyFuture workshops, tools and resources;
- Culture: Embedding change through effective communication and education; and
- Structure: Building age friendly practices by looking at NAB's structure, policy and processes with a mature age lens.

As a central element of our mature age strategy, MyFuture is designed to provide mature age employees and their managers with the capabilities to make informed decisions and plan for the future – whether this is career redirection, a change of pace, or transition to retirement. The program helps men and women aged 50 and over to extend their careers

and plan their futures through education on flexibility, work-life balance and managing personal change.

MyFuture was successfully piloted in 2010 and has since been rolled out across Australia with over 750 employees and over 250 managers having participated in the program to date. Tangible impacts of the program are very positive:

Actions taken by employees to date include:

- 47% have undertaken a health check;
- 42% have organised a financial planning consultation; and
- 35% have developed a flexible work proposal.

Impacts on managers include:

- 96% said they have a better understanding of ageing workforce issues;
- 89% feel better equipped to have a conversation with their mature age team members; and
- 82% have taken steps towards reducing barriers that might exist within their team for mature age retention.

[Results based on evaluation survey conducted immediately post workshop and post impact survey taken six to eight weeks following workshop attendance.]

Our Diversity and Inclusion Strategy

Source Talent

NAB aims to carry out best-practice recruitment procedures including the requirement for a gender mix of short-listed candidates and decision panels for senior roles and a diversity clause in our Preferred Supplier Service Agreement. Since January 2012, NAB's preferred external recruitment agencies are required to demonstrate that they comply with NAB's Diversity and Inclusion Policy, have a written diversity policy or framework and undertake appropriate diversity training for their people.

Consider Careers and Capability

NAB's focus has been to ensure our mature age people are able to fulfil their aspirations and goals. To do this, NAB has:

- Introduced a six-step process for Career and Development planning;
- Promoted Sageco's Create MyFuture workshops, a dedicated approach to learning and development that strives to help employees aged 50 and over to extend their careers through education on flexibility, balance and managing personal change. The program also aims to increase our competitive advantage by increasing retention of valued employees and reducing loss of expertise and capability;
- Provided access to Envisage, Sageco's online framework that helps employees plan for their future; and

- Maintained focus on increasing the number of women within senior levels of management through career building networks such as Connecting Women, and programs like Realise and Board Ready.

This award winning program helps women prepare for the transition to senior management, subsidiary board positions and community partner directorships by providing a variety of networking, behavioural, observation, mentoring and alumni activities.

Cultivate Culture

NAB works to create a culture that respects and values the wisdom and experience of our mature age employees through the introduction of a number of initiatives such as:

- Sageco’s leadership forums for managers to learn about the ageing workforce, our organisation’s response to the changing demographics and the importance of valuing the maturity, knowledge and experience of our older employees; and
- A leadership program focused on unconscious bias and its impact on individual and group decision making. Consciously addressing unconscious bias is critical to the equality of opportunity for women at all levels and to maximise gender and age diversity and inclusion.

“Being involved in MyFuture really gives you a sense of being valued and respected for your knowledge and the amount of time you’ve spent in the industry. Mentally I feel young and I certainly feel that I have a lot to offer over many more years.”

Julie Siragusa, NAB Digital Communications Manager

Get Flexible

At NAB, flexible working options are a fundamental part of the way we do business. It is about giving our people real choices to manage the balance between work and their personal life and allows us to be creative when delivering on our business objectives and individual employee needs.

- Results from the MyFuture program indicate that 88% of participants would continue working for longer if they can work more flexibly.
- NAB found that employees sometimes made false assumptions, including that they would lose their position for taking advantage of certain flexible work arrangements. To address this, NAB took action to increase the understanding around implementing flexible work practices.
- Flexibility offerings include salary averaging options, job sharing, part time work, compressed working weeks, telecommuting and access to dependent care services for family members.

Investment In Health and Wellbeing

To support the healthy ageing of our people, employees have access to:

- My Health and Wellbeing, an interactive portal encouraging health management;
- Free annual onsite influenza vaccinations for employees;

- Confidential support services for personal or work-related issues;
- An online video database addressing a broad range of illnesses such as heart disease and anxiety;
- Discounts on gym memberships; and
- A Health Insurance program for all permanent employees and their families.

In addition, NAB supports Mental Health Week and has worked closely with Mental Health at Work, Beyondblue and Lifeline to promote awareness and access to services.

Focus On Financial Wellbeing

NAB has sought to lead the way in financial wellbeing for its female workforce, by:

- Conducting a gender pay equity audit in partnership with the Finance Sector Union. As the only major bank [as of 2013] to have conducted an audit of this nature, we focused on identifying any gender-based pay inequities while investigating possible causes or barriers to equal pay;
- Undertaking a detailed pay analysis across selected roles within Business Banking and Financial Planning and looking at the experiences of employees returning from primary carer's leave; and
- Including provisions in our Enterprise Agreement for older workers who want to change their working arrangements to suit lifestyle changes without financial penalty. For example, having the ability to freeze accrued long-service leave entitlements at the higher pay rate when taking on a role at a lower salary or reduced working hours.

Next Steps

NAB is committed to building a diverse and inclusive workforce that values employees across all ages, genders and backgrounds. NAB will continue working to ensure a level of inclusion for mature-age workers by providing opportunities and changing mind sets.

6.5. Case Study: Mercy Health

Mercy Health, founded by the Sisters of Mercy, is a Catholic provider of health services employing over 5,500 people. We provide acute and subacute hospital care, aged care, acute and community mental health programs, specialist women's health, early parenting, palliative, home and community care and health worker training and development.

A Compelling Business Case: Creating A Sustainable Workforce

With an ageing workforce it was essential for Mercy Health to raise the awareness of the demographic change facing our organisation, and the risks, challenges and opportunities associated with an older workforce. With an average age of 44.6 years and 50% of our workforce aged over 45 years (86% of whom are female) it was imperative that we developed a plan to manage our ageing workers. The key issue facing Mercy Health was the need to manage our ageing workforce in a way that ensures organisational sustainability and growth, and supports the needs of older workers.

Mercy Health engaged the services of external provider Sageco to assist in developing and implementing an effective older worker plan. Sageco ran a series of *Making Maturity Matter* focus groups with majority female (91%) older staff to identify key opportunities for engaging and retaining this employee segment. Focus group findings in company with human resource information system data enabled three particular employment enablers to be identified, these being:

- *Health and Wellbeing* – to proactively address escalating work cover costs and the physicality of roles in our industry.
- *Flexibility* – to support health and wellbeing and create a flexible work environment across the life stages.
- *Retirement Transition* – to retain older workers and therefore minimise loss of valuable knowledge and experience.

Working with Sageco, Mercy Health implemented a range of consultative and educational initiatives, these being Age Management leadership forums, *Create your Future* employee seminars and an online version of this seminar called *Envisage*.

Create Your Future / Envisage Employee Seminars

Create your Future seminars were designed to engage female and male older workers and assist them in planning a positive and productive late career and retirement. The seminars were held at two Mercy Health sites and attended by a total of 46 employees.

The seminars were well received, however feedback indicated that due to our geographically dispersed workforce and business requirements, it was difficult to release a large group of older workers to maximise the reach of the program.

Subsequently, an online version of this program called *Envisage* was trialled, to address the challenge of geographically dispersed workforce, ensure limited impact on business requirements and maximise its reach across our organisation.

Envisage is delivered online via an e-Module with the option of a journal to accompany the program. As Mercy Health's workforce is not particularly tech savvy, we decided to offer two options to pilot participants, to determine if having access to a journal was beneficial. A total of 50 employees (92% female) participated in the six week program via two options:

- Group 1 – 30 participants (access to online module and journal)
- Group 2 – 20 participants (access to online module only).

Participants were provided with a six week window to complete the one hour online module via their work or personal computer. Six weeks post completion, employees were asked to evaluate the program and the usefulness of the journal. Participants then received access to the online program for a further 11 months.

A dedicated resource to manage the program and a strong communication plan was essential in engaging our employees and ensuring the success of the program. The following communication took place:

- Briefing paper submitted to the Executive Group to ensure buy in and support from the top level.
- Email sent to all people managers informing them of the pilot program and encouraging them to engage with their older employees.
- Email sent to all older employees inviting them to submit an expression of interest.
- Confirmation email sent to successful participants highlighting that the program is a gift to assist them in making decisions about their future.
- Reminder emails sent at key points to employees that had not yet logged in to the program, and to all participants advising that they had one week/one day left to complete the module.
- Thank you email sent to all participants and invitation to review the program via an online feedback survey.
- Results from feedback survey communicated to all participants.

Evaluation of Impact

Evaluation of the trial indicated the following positive impacts and areas for future focus in relation to the employment of older female and male workers.

Careers and Capabilities

- 27% had taken steps to develop their career, with a further 15% planning to.
- Only 11% of participants had spoken to their manager or people leader about their career.

Flexibility

- 11% had implemented a flexible work proposal however, the majority (78%) of participants had not.

Health and Wellbeing

- 43% had undertaken a health check, with a further 11% planning to.
- 68% had taken steps to improve their nutrition.
- 68% had taken steps to improve their approach to exercise, with a further 18% planning to.
- 68% had taken steps to improve their approach to stress.
- 57% had taken steps to improve their sleep habits.
- 36% had developed active pursuits outside of work, with a further 39% planning to.

Financial Wellbeing

- 28% had held a conversation with a financial advisor, with a further 29% planning to.

“I think it is a practical wake up call to take things in hand and start some planning for retirement. Sometimes you can be paralysed by thinking you have left things too late but when you start to change things you find that you haven’t. I often read the money section of the Age newspaper but never acted on any advice from that. I have acted on recommendations from Envisage.”

Mercy Health Envisage Participant

- 43% had created or reviewed their budget, with a further 29% planning to.

Transition Planning

- 54% had held a conversation regarding their future plans with significant others, followed by 15% who plan to.
- 23% had developed a personal action plan to achieve their goals in the future, with a further 46% planning to.

What's Next?

On completion of the *Envisage* trial program, detailed feedback results were communicated to the Executive Group and participants were advised that they were able to access the online module for a further 11 months.

Mercy Health's future focus includes:

- Continuing to connect and engage with our older workforce via internal communication channels (intranet, publications etc.)
- Focusing on knowledge transfer opportunities through completing a needs analysis to identify gaps as a starting point for action
- Optimising our 'age positive' employer brand through intentional attraction and recruitment activity
- Developing flexible working arrangements tailored to our mature workforce (particularly addressing the needs of those caring simultaneously for children and ageing parents)
- Developing a robust reporting tool to monitor our 45 plus employee cohort.

ENDNOTES

¹ Australian Bureau of Statistics (2013). *Disability, ageing and carers, Australia: Summary of Findings 2012* (No. 4430.0). Table 9. Canberra: ABS.

² Australian Institute of Health & Welfare (2008) *Disability in Australia: Trends in prevalence, education, employment and community living*.

³ Australian Bureau of Statistics (2010). *Disability, ageing and carers*. (No. 4430.0). Canberra: ABS

⁴ Australian Institute of Health & Welfare (2008). *Ibid*

⁵ Australian Bureau of Statistics (2015). *Labour Force Australia, October 2015*. (No. 6202.0). Canberra: ABS

⁶ Organisation for Economic Co-operation and Development (OECD) (2010), *Sickness, Disability and Work: Breaking the Barriers: A Synthesis of Findings across OECD Countries*, OECD Publishing, Paris.

⁷ OECD (2010) *Ibid*

⁸ Australian Human Rights Commission. (2015). *Annual report 2013-14*, AHRC: Sydney

⁹ Australian Government. (2015). 2015 [Intergenerational Report: Australia in 2055](#). Canberra: The Treasury.

¹⁰ Australian Chamber of Commerce and Industry. (2010) [It's Not About Age. Pathways For Engaging Mature Aged People & Existing Workers As Apprentices](#)

¹¹ Australian Bureau of Statistics (2013). *Disability, ageing and carers, Australia: Summary of Findings 2012* (No. 4430.0). Canberra: ABS.

¹² 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.

¹³ Noble, J. (1999). *Entrepreneurial Research Project conducted on behalf of Telstra*. Telstra Australia

¹⁴ 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.

¹⁵ 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.

¹⁶ 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.

¹⁷ 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.

¹⁸ Australian Safety and Compensation Council. (2007). *Are People with Disability at Risk at Work?* Canberra: Australian Government Department of Employment and Workplace Relations.

¹⁹ Fifth Quadrant Analytics (2013) [Sustainable Value Creation Through Disability: The Global Economics of Disability Annual Report 2013](#). New York: The Return on Disability®Company

²⁰ Kohlbacher, F. (2013). 'The Business of Aging'. [AGEnda Aging and Work Blog](#), February 20th, 2013, Sloan Center on Aging & Work, Boston College.

²¹ Allen, D (2010) 'Remedying Discrimination: the Limits of the Law and the Need for a Systemic Approach', *University of Tasmania Law Review* 29(2), p 83.

²² Australian Human Rights Commission. (2011). *Federal Discrimination Law 2011 Edition*, AHRC: Sydney

²³ Australian Human Rights Commission. (2003). [A Bad Business: Review of Sexual Harassment in Employment Complaints 2002](#).

²⁴ VicHealth. (2007). [More than Tolerance: Embracing Diversity for Health](#).

²⁵ 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.

²⁶ 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.

-
- ²⁷ Commonwealth of Australia. (2011). *2010–2020 National Disability Strategy: An initiative of the Council of Australian Governments*. Canberra: Commonwealth of Australia.
- ²⁸ Australian Bureau of Statistics (2013). *Disability, ageing and carers, Australia: Summary of Findings 2012* (No. 4430.0). Canberra: ABS.
- ²⁹ Australian Bureau of Statistics. (2011). *Disability, Australia, 2009*. (No. 4446.0). Canberra: ABS
- ³⁰ Australian Bureau of Statistics (2013). *Disability, ageing and carers, Australia: Summary of Findings 2012* (No. 4430.0). Canberra: ABS.
- ³¹ Women With Disabilities Australia (WWDA). (2005). [Submission to the HREOC National Inquiry into Employment and Disability](#).
- ³² Women With Disabilities Australia (WWDA). (2004). [Submission to the HREOC - Request for comments on the possible public inquiry on employment and disability issues](#).
- ³³ Temple J and Adair T, (2012) *Barriers to Mature Age Employment: Final Report of the Consultative Forum on Mature Age Participation*, Prepared on behalf of the Consultative Forum on Mature Age Participation by National Seniors Productive Ageing Centre (NSPAC), Canberra, Department of Education, Employment and Workplace Relations (DEEWR).
- ³⁴ 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
- ³⁵ Australian Bureau of Statistics. (2010). *The Health and Welfare of Australia's Aboriginal and Torres Strait Islander Peoples 2008*. (tNo. 4704.0). Canberra:ABS
- ³⁶ Australian Bureau of Statistics. (2011). *Disability, Australia, 2009*. (No. 4446.0). Canberra: ABS