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15 December 2008

National Disability Strategy  
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To whom it may concern,

**DCA's submission to the National Disability Strategy**

I am delighted to enclose Diversity Council Australia's submission to the Australian Government's National Disability Strategy.

DCA is the independent, non-profit workplace diversity advisor to more than 100 organisations – many of whom are among Australia's biggest employers.

DCA and its members welcome the strategy. Our submission has been prepared as a result of consultation with our members, many of whom are leading the way in efforts to attract, retain and promote persons with disabilities.

Yours sincerely,

Nareen Young  
Chief Executive Officer



# Employing people with disability: beyond the deficit approach

DCA submission to  
the Australian Government's  
National Disability Strategy

**December 2008**

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# 1. ABOUT DIVERSITY COUNCIL AUSTRALIA

Diversity Council Australia (DCA) provides diversity advice and strategy to over 100 organisations, many of whom are Australia's biggest employers.

Our mission is to lead in diversity thought and practice in Australia in partnership with our member organisations to:

1. understand and achieve leadership in diversity thinking and practice in an Australian context
2. realize business improvement through successful diversity programs
3. implement effective compliance management in a changing legislative environment, and
4. publicly demonstrate commitment to diversity.

DCA members have access to a range of free or discounted services that support and enhance their internal diversity and inclusion capabilities and external profile.

## 2. STATE OF PLAY

DCA notes that 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.

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 million<sup>1</sup>. 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<sup>2</sup>.

While the number of people with disability has increased over past decades, the gap in participation between people with and without disabilities remained the same.<sup>3</sup> (This compares unfavourably to women's workforce participation which has increased substantially over the past two decades, from 49% in 1984 to more than 58% in 2006<sup>4</sup>).

Added to this, people with disability have lower labour force participation rates than people without disability. Between 1988 and 2003, participation rates of people with disability were consistently about 30 percentage points lower for males and 22 to 25 points lower for females, compared with people without disability.<sup>5</sup> In 2003, 53% of

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<sup>1</sup> Australian Institute of Health & Welfare (2008) *Disability in Australia: Trends in prevalence, education, employment and community living*.

<sup>2</sup> Australian Bureau of Statistics (2003) *ABS survey of disability, ageing and carers*, ABS Cat. No. 4430.0.

<sup>3</sup> Australian Institute of Health & Welfare (2008).

<sup>4</sup> Australian Bureau of Statistics (2006). *ABS 1986-2006 censuses of population and housing*, Available at: <http://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/4102.0Chapter7002008>

<sup>5</sup> Australian Institute of Health & Welfare (2008)

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people with disability participated in the labour force compared to 80% of people without disability.<sup>6</sup>

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%).<sup>7</sup> OECD noted that employment rate for people with disability is disappointing given Australia's economy burgeoning in recent years.

### **3. BUSINESS CASE**

In a tight and shrinking labour market, employers will need to recruit from a more diverse talent pool in order to meet their workforce needs. People with disability provide an often untapped talent pool. According to *Australian Employers' Network on Disability*, research indicates:

- 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;
- 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;
- The average recruitment cost of an employee with disability was 13% of the average recruitment cost of an employee without disability;
- Employees with disability averaged one-sixth the recorded occupational health and safety incidents of employees without disability;
- 90% of employees with disability record productivity rates equal or greater than other workers;
- 98% have average or superior safety records;
- 86% have average or superior attendance records.

Other research has shown that people with disability often surpass their counterparts without disability in terms of loyalty, safety and productivity in the workplace. Such research demonstrates that employees with a disability:

- Have lower absenteeism rates. 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 (Noble 1999, Entrepreneurial Research Project conducted on behalf of Telstra).

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<sup>6</sup> Australian Bureau of Statistics (2003).

<sup>7</sup> 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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- Have higher retention rates. The same 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.
  - Reduce recruitment and training costs. 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<sup>8</sup>.
  - Have fewer workplace injuries (Graffam et al., 1998). Employees with a disability have, on average, just 16% of the recorded occupational health & safety incidents of all employees. 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".

As well as these financial advantages, employing a person with disability can have significant benefits in terms of an organisation's corporate reputation. With approximately 20% of the Australian population having one or more disability, it goes without saying that around the same percentage of most organisations' customers and clients will also have one or more disability. Having a workforce that reflects the diversity of your customer base, and the community in which you operate, can significantly enhance corporate reputation, increasing customer satisfaction and loyalty.

Having employees with disability in your workforce means that you will have access to a depth of knowledge and experience in relation to your customers and stakeholders with disability, giving you an advantage over your competitors.

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.

## **4. LEADING EDGE PRACTICE FROM DCA MEMBERS**

DCA members have adopted a leadership stance with respect to the employment of people with disability and the provision of inclusive workplaces and accessible products and services. Leading DCA members realise the business benefits associated with progressing the disability agenda in their own organisations and have taken innovative actions in this area.

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<sup>8</sup> 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.

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## ANZ

ANZ is pleased to support the Diversity Council of Australia's submission on the Australian Government's National Disability Strategy.

ANZ's strategy to attract and retain people with disability has the following business drivers:

- To increase opportunities for customers with disabilities to do business with ANZ, and
- To provide an inclusive work environment for staff with disabilities.

To achieve its strategy, ANZ is doing more to recruit, retain, develop and harness the experiences of employees with disabilities.

Its Disability Action Plan Steering Committee, for example, comprises a group of senior leaders who have responsibility and accountability for the implementation of ANZ's Disability Action Plan. This plan contains specific initiatives to ensure the workplace welcomes and supports people with disabilities. The committee meets regularly and progress against each initiative is carefully tracked. ANZ reports on progress externally through its Corporate Responsibility report, published bi-annually.

ANZ has a number of policies and practices to support employees with disabilities, for example, the bank has a Reasonable Accommodation policy to ensure people with disabilities have the equipment or resources they need to perform their role.

ANZ has a Technology Accessibility Policy to ensure improved accessibility of information and communication for customers and employees with disabilities. ANZ also has an internal Technology Accessibility Hotline for any staff with disabilities to call with any issues concerning accessibility of their technology.

For customers, ANZ has developed, in partnership with McDonald's and the Australian Employers' Network on Disability (AENOD), an information booklet called "Welcoming Customers with a Disability". This was distributed to all customer facing employees across Australia.

ANZ has installed more than 2,000 audio-enabled ATMs, which allow ATM users to listen to an audio translation of information as it appears on the screen, and has also introduced audio enabling branch ticketing machines.

Nine of ANZ's most commonly used product documents are available to customers in Braille, large prints and audio CD format. The bank has also adapted ANZ's online *MoneyMinded* financial literacy courses to be accessible for employees, customers and members of the community with vision impairment. Both of these initiatives have been completed with the support from Vision Australia.

ANZ's employee Disability Network has recently launched its re-edited DVD called "Reach Out" that helps increase our employees' awareness and understanding of the issues facing our disabled colleagues and customers.

ANZ has received positive feedback from both customers and staff with disabilities on the range of products and services available, but appreciates there is still more to do in this important area to meet the needs of customers and staff with a disability, especially around recruitment.

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## **The Australian Tax Office and Stepping into... program**

Over the next few years the Tax Office will be looking to attract and retain an increasing number of people with disability into areas of operations where we can provide relevant and desirable careers as well as enhance services to clients in the community with disability. The Tax Office is working with the Australian Employers' 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 Tax 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.

In accordance with Regulation 3.3 of the Public Service Regulations one of the business areas of the Tax Office has implemented a pilot program which provides employment opportunities for people with disability. This employment program offers an opportunity for people with disability to gain skills and experience to assist them to participate in the workforce.

## **Department of Immigration and Citizenship**

The Department of Immigration and Citizenship seeks to attract and retain employees with disability as they are 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 Employers' Network on Disability, the department provides disability awareness training to Independent Committee Members who provide advice to recruitment selection panels.

Thirty Independent Committee Members have now been 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.

## **IBM Australia**

IBM Australia was a finalist in the 2007 Prime Minister's Employer of the Year awards. IBM Australia wants to see more people with disability working across the business at all levels of the organisation. IBM furthers its goal of attracting and retaining employees with disability by ensuring its practices and processes are streamlined to

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accommodate the diverse needs of people with disability. It also ensures that people with disability are represented amongst its contractors. Other incentives for people with disability include training and internships. Importantly, all of these initiatives are driven by its Diversity Council, which is chaired and championed by the Chief Executive Officer. One way of encouraging more people with disability to join the information technology industry has been through external partnerships. As part of the School Speakers Programme, for example, IBM employees with disability visit schools and act as role models for students with disability.

## 5. DCA POSITION

To assist in progressing equality of employment for people with disability in Australian workplaces, DCA has developed this submission on the basis of consultation with our members, Australia's leaders in diversity practice. The submission consists of an overarching position and five recommendations for change, as outlined below.

### Overarching DCA position

DCA welcomes the development of a National Disability Strategy that seeks to adopt a new whole-of-government, whole-of-life approach to disability issues to tackle the social and economic divide between people with disability and those without.

DCA also congratulates the Australian Government on developing a National Mental Health and Disability Employment Strategy (to be released end of 2008) that aims to address the barriers that are faced by people with a disability and/or mental illness that make it harder for them to gain and keep work.

DCA members are committed to, and support, initiatives such as these that aim to address barriers faced by Australians with disability and promote social inclusion

The development of such strategies is particularly pertinent given the government's recent ratification of the [United Nations Convention on the Rights of Persons with Disabilities](#).

### Recommendation 1: Ensure employment is a key focus area

DCA recommends that the government make the employment of people with disability a key focus area for the Strategy. DCA notes that such a recommendation is in alignment with the government's National Disability Reform Agenda that seeks to drive reform in the key area (amongst others) of workforce capacity. More specifically, the Strategy should consider employment practices (including targets for opportunity and participation by people with disability), and accessible premises, communications, procurement, and goods and services.

### Recommendation 2: Adopt a business benefits positioning

DCA encourages the government to adopt a business benefits positioning in employment-related sections of the Strategy. This contrasts with existing 'deficit' positioning in the general and business community, in which the focus is on perceived 'deficiencies' of people with disability. This positioning overlooks the significant business benefits of employing people with disability, in addition to underplaying the role employers play in providing accessible and inclusive workplace practices and environments.

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### **Recommendation 3: Consider employment initiatives in broader social context**

DCA encourages the government to ensure employment initiatives are considered in the broader social context, such that these initiatives are linked with other related issues (eg transition from education to employment, pathways from supported to open employment, relationships between income security and employment participation and opportunity).

### **Recommendation 4: Resource educational tools for employers**

DCA encourages the government to continue to resource the development and dissemination of educational tools on the employment of people with disability for employers. Examples of good work in this area can be found in the *Opportunity* publication by the Australian Employers' Network on Disability, the government's JobAccess web-site and Workplace Adjustment Tool, and the Australian Human Rights Commission's Disability Discrimination web-site.

### **Recommendation 5: Create a web-based information 'portal' for organisations**

DCA members would welcome the creation of an information 'portal' for organisations. Currently educational information and tools (including information on differing service providers) is dispersed and not easy to locate. Having a web-based portal that provided a centralised repository of relevant information or links would greatly support organisations seeking to provide inclusive and accessible workplaces, products and services. Consideration could be given to building on and greatly expanding the government's JobAccess web-site (or equivalent) when developing such a portal.