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2 September 2024

By email: ADSReview@dss.gov.au

DCA submission in response to Australia's Disability Strategy Review Discussion Paper, August 2024

Dear Secretary, Department of Social Services, Ray Griggs

Thank you for the opportunity to provide feedback on your Discussion paper:
Australia's Disability Strategy Review, August 2024.

Diversity Council Australia (DCA) is the independent not-for-profit peak body leading diversity and inclusion in the workplace. We have over 1,300 member organisations, reaching approximately 20% of the Australian labour market.

We fully support the current vision of Australia's Disability Strategy (ADS) for an inclusive Australian society that ensures people with disability can fulfil their potential as equal members of the community. The workplace is an extremely important site for inclusion – a place where most people spend the greater part of their lives. Our submission focuses on our current understanding of the workplace environment for people with disability and how the ADS can assist in addressing some of the challenges and barriers facing people with disability at work.

A note on language:

DCA recognises that a diversity of terms is used to describe people's lived experience. We recognise and respect individuals' right to identify with terms that they feel most comfortable with. We also recognise the limitations of binary language. However, sometimes binary categories have very real effects on peoples' experiences and may be necessary to convey the gendered nature and dynamics of our society.

DCA uses person-first language by using the term 'people with disability' but we recognise that many people with disability prefer identity-first language (i.e. a disabled person). We also acknowledge the diversity in disabilities and the impact this has on the experiences of people. Furthermore, some specific communities such as Autistic and Deaf communities may not define themselves as disabled at all.

DCA recognises that language is socially constructed and constantly evolving and our intention is always to be inclusive and to be open to change.

A note on intersectionality:

DCA recommends an intersectional approach when developing and implementing policy and programs. Intersectionality refers to how some people experience compounded discrimination due to multiple marginalising and interlinked characteristics.¹ An intersectional lens on the lived experience of people with disability will add significant value to inform the review of the ADS.

Introduction:

According to the Australian Bureau of Statistics², in 2022, 21.4% (or 5.5 million) Australians have a disability, an increase from 17.7% (4.4 million) in 2018. However, only 59.1% are employed on a full-time basis compared to 68.3% of people without a disability³.

People with disability are twice as likely to be unemployed as people without disability⁴. Whilst there are signs of improved labour force participation rates of people with disability, they continue to be overlooked and underleveraged in the Australian labour market.

In November last year, DCA provided a submission⁵ to your Department in response to an options paper on **Establishing a Disability Employment Centre of Excellence**⁶. We welcomed the formation of such a centre, quoting our own research⁷ showing that people with disability are amongst the highest groups experiencing discrimination and/or harassment at work compared to workers from mainstream or majority groups.

DCA strongly supports the priority for the ADS in addressing the employment barriers and related challenges faced by people with disability across Australia.

This falls under the ADS outcome area: **Economic and Financial Security**. Your consultation findings to date suggest people with disability feel there needs to be more targeted support to improve the transition from education to employment. They also found that people with disability identify significant barriers to employment. Our response to your discussion questions below provide some general comments based on our own research findings and engagement with our members and stakeholders.

Discussion questions:

- Do you agree that addressing employment barriers and post-school transitions should be priorities for future work under ADS?
- How should ADS take action to decrease employment barriers?
- How should ADS take action to improve post-school transitions?
- In what other ways could we improve this Outcome Area?

Comments:

DCA's latest research – our 2023-2024 Inclusion@Work Index⁸ - suggests that **fewer employees with disability feel connected and able to contribute at work compared with employees without disability**. Our data set found that 77% of people without disability agreed that they did not have to hide or change who they are at work to fit in compared to 68% of employees with disability. 81% of employees without disability agreed they were able to contribute to discussions so that different views inform decisions compared to 71% of employees with disability.

Other findings showed differences between employees with disability and those without disability including whether employees feel their manager treats them fairly, trust in their organisation to treat them fairly, everyday exclusion such as having people make incorrect assumptions about their abilities, being ignored and left out of social gatherings. All point to distinctly different, and **less favourable employment experiences for people with disability**.

One of the key issues DCA identified is the importance of **disability status data** as a powerful inclusion tool for organisations to make evidence-based decisions about their policies and programs and to monitor progress. We partnered with **Australian Disability Network** to generate **practical guidelines**⁹ that assist organisations create environments where people with disability feel safe to share their disability status with their employers.

In these guidelines we identified four organisational 'locks' – what prevents employees from feeling safe enough to share their disability status and four 'keys' – what can organisations do to enable employees to feel safe to share their disability status. We recognise there are interpersonal factors and systemic factors at play that create work environments where people with disability feel unsafe in sharing their disability status and our guidelines provide practical advice to help overcome these issues.

We believe that more accurate and reliable disability status data will help organisations and government develop more effective policies and programs to improve the overall employment experience of people with disability, remove some of the barriers to employment and lead to a more equitable employment experience for people with disability.

It is also highly possible that by improving the employment experience of people with disability, women – who are twice as likely than men to provide unpaid care for a person with disability¹⁰, will benefit as they will gain more freedom to enter the paid workforce or increase their paid hours. This may contribute to addressing the economic inequalities women still face such as the gender pay gap.

DCA notes and supports the Department's emphasis on relying on the voices of people with disability because they are indeed the experts on their lives. We strongly advocate for centring marginalised voices at work and recently produced a guide¹¹ that clarifies what it means to centre voice and why it is so important.

Please feel free to contact myself or Jacqueline Braw, Senior Advocacy and Government Relations Manager, on jacqueline@dca.org.au should you require any further information.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'L. Annese', with a long horizontal flourish extending to the right.

Lisa Annese
Chief Executive Officer

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- ¹ Diversity Council Australia (V. Mapedzahama, F. Laffernis, A. Barhoum, and J. O'Leary). *Culturally and Racially Marginalised Women in Leadership: A framework for (intersectional) organisational action*, Diversity Council Australia, 2023. [CARM women in leadership - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/research/carm-women-in-leadership)
- ² [Disability, Ageing and Carers, Australia: Summary of Findings, 2022 | Australian Bureau of Statistics \(abs.gov.au\)](https://abs.gov.au/visualisations/infographics/infographic/disability-ageing-and-carers)
- ³ Australian Human Rights Commission. <https://humanrights.gov.au/our-work/disability-rights/employment-for-people-with-disability-Australia#:~:text=In%20Australia%2C%20for%20people%20with,31.7%25%20of%20people%20without%20disability>
- ⁴ Australian Institute of Health and Welfare (AIHW), *People with Disability in Australia*, AIHW, 2024.
- ⁵ [Response to Establishing a Disability Employment Centre of Excellence - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/research/carm-women-in-leadership)
- ⁶ [Establishing a Disability Employment Centre of Excellence \(dss.gov.au\)](https://dss.gov.au/our-work/disability-employment-centre-of-excellence)
- ⁷ *Inclusion@work Index. Mapping the state of inclusion in the Australian workforce. Synopsis Report*, Diversity Council Australia, 2022. [Inclusion@Work Index 2021-2022 - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/wp-content/uploads/2022/03/DCA-Inclusion@Work-Index-2021-2022-Synopsis.pdf)
- ⁸ Diversity Council Australia (R. D'Almada-Remedios), *Inclusion@Work Index 2023–2024: Mapping the State of Inclusion in the Australian Workforce Synopsis Report*, Diversity Council Australia, 2024 <https://www.dca.org.au/wp-content/uploads/2024/03/DCA-Inclusion@Work-Index-2023-2024-Synopsis.pdf>
- ⁹ Diversity Council Australia (DCA) & Australian Disability Network, *Inclusion@Work Index: Disability Data at Work – How Organisations Can Capture Disability Data Safely and Respectfully*, DCA, 2024. <https://www.dca.org.au/research/disability-data-at-work>
- ¹⁰ Diversity Council Australia. *Let's Share the Care at Home and Work. A call to action to reduce the gender pay gap*. Diversity Council Australia, May 2019. [Let's Share the Care - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/research/lets-share-the-care)
- ¹¹ Diversity Council Australia (Mapedzahama, V., Ojinnaka, A., Deo, S. and O'Leary, J.) *Centring Marginalised Voices at Work: Lessons from DCA's Culturally and Racially Marginalised (CARM) Women in Leadership Research*, Sydney, Diversity Council Australia, 2024. <https://www.dca.org.au/research/centring-marginalised-voices-at-work>

