# Blind Citizens Australia logo

Ph 1800 033 660 | E bca@bca.org.au | W [bca.org.au](http://www.bca.org.au/) | ABN 90 006 985 226

# Response to the Employment White Paper

The Treasury: employmentwhitepaper@treasury.gov.au

Lodged via: <https://consult.treasury.gov.au/employment-white-paper/public-submissions>

Author: Jackson Reynolds-Ryan, Policy & Advocacy Manager

jackson.reynolds-ryan@bca.org.au

14th December 2022

## Contents

[](#_Toc121911083)

[1. Introduction 3](#_Toc121911086)

[1.1 About Blind Citizens Australia 3](#_Toc121911087)

[1.2 About people who are blind or vision impaired 3](#_Toc121911088)

[2. Submission context 4](#_Toc121911089)

[3. Blind Citizens Australia’s submission 5](#_Toc121911090)

[3.1 Barriers to Employment 5](#_Toc121911091)

[3.2 Employment Programs and Policies 10](#_Toc121911092)

[3.3 Improving employment participation for people with disabilities 16](#_Toc121911093)

[4. Summary of Recommendations 21](#_Toc121911094)

## 1. Introduction

### 1.1 About Blind Citizens Australia

Blind Citizens Australia (BCA) is the peak national representative organisation of and for the over 500,000 people in Australia who are blind or vision impaired. For nearly 50 years, BCA has built a strong reputation for empowering Australians who are blind or vision impaired to lead full and active lives and to make meaningful contributions to our communities.

BCA provides peer support and individual advocacy to people who are blind or vision impaired across Australia. Through our campaign work, we address systemic barriers by promoting the full and equal participation in society of people who are blind or vision impaired. Through our policy work, we provide advice to community and governments on issues of importance to people who are blind or vision impaired. As a disability-led organisation, our work is directly informed by lived experience. All directors are full members of BCA and the majority of our volunteers and staff are blind or vision impaired. They are of diverse backgrounds and identities.

### 1.2 About people who are blind or vision impaired

There are currently more than 500,000 people who are blind or vision impaired in Australia with estimates that this will rise to 564,000 by 2030. According to Vision Initiative, around 80% of vision loss in Australia is caused by conditions that become more common as people age[[1]](#endnote-1).

Australians who are blind or vision impaired can live rich and active lives and make meaningful contributions to their communities: working, volunteering, raising families and engaging in sports and other recreational activities. Work generates wages, less reliance on welfare, dignity, a sense of purpose and productivity. Work is the cornerstone of social inclusion, and people who are blind or vision impaired can and have worked in a range of occupations; ranging from a car detailer to an accountant to a chemical manufacturer to an administration assistant - to name just a few careers.

The extent to which people can actively and independently participate in community life does, however, rely on facilities, services and systems that are available to the public being designed in a way that makes them inclusive of the needs of all citizens – including those who are blind or vision impaired.

## 2. Submission context

This submission is based on existing legislation and frameworks, noting gaps in the fulfilment of requirements laid out in existing documentation. The pertinent acts and legislation are:

* United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
* The Disability Discrimination Act 1992 (Cwlth)
* The National Disability Strategy 2021-2031 (this strategy coordinates the implementation of the UNCRPD)

This submission is a response to the White Paper Terms of Reference, especially sections:

**2.1 –** Building a sustainable care economy in the context of an ageing population and other drivers of demand for care services.

**4 –** Pay equity, including the gender pay gap, equal opportunities for women and the benefits of a more inclusive workforce.

**5.1 –** Reducing barriers and disincentives to work, including the role of childcare, social security settings and employment services.

**5.2 –** Improving labour market outcomes for those who face challenges in employment, including First Nations people, those who live in rural and remote areas, younger and older Australians, people with disability, and those who may experience discrimination.

**6 –** The role of collaborative partnerships between governments, industry, unions, civil society groups and communities, including place-based approaches.

Our response is based on extensive consultations with members and other people who are blind or vision impaired, the experiences from our Eye to the Future employment program, and our ongoing advocacy work in the sector.

## 3. Blind Citizens Australia’s submission

### 3.1 Barriers to Employment

#### Labour Force Participation for People who are Blind or Vision Impaired

According to the Australian Bureau of Statistics (ABS), over 4.4 million Australians have some form of disability - roughly equating to 1 in every 5 Australians having a disability.

As a signatory to the UNCRPD, governments in Australia have an obligation to “safeguard and promote the realisation of the right to work”, and to protect the rights of people with disability “to just and favourable conditions of work”, on an equal basis with others[[2]](#endnote-2).

The UNCRPD is operationalised in Australia through the Australian Disability Strategy (2021 – 2031), and its predecessor, the National Disability Strategy (2010-2020).

The 2010-2020 National Disability Strategy included a specific outcome area on Economic Security - Outcome 3: People with disability, their families and carers have economic security, enabling them to plan for the future and exercise choice and control over their lives. Despite this focus within the strategy, the second progress report (2016) showed that very little progress had been made.

“People with disability believe that, overall, little progress has been made in improving their economic security.

People with disability identified continuing challenges, including limited employment opportunities and options and a lack of understanding or willingness by employers to employ people with disability.”[[3]](#endnote-3)

The Australian Disability Strategy 2021 – 2031, again rightly acknowledges that access to appropriate employment “supports people with disability to have more control over their lives, be financially independent and have a better standard of living [as well as leading to] … better mental and physical health and wellbeing”[[4]](#endnote-4).

Yet people with disability consistently face barriers in finding and maintaining employment, with data from 2019 indicating that only 48% of people with disability of working age (15–64 years) are employed, compared with 79% without disability[[5]](#endnote-5). In other words, 52% of Australians with disability of working-age are unemployed. The barriers faced by people with disability include negative assumptions, attitudes and misconceptions held by employers and the wider community about the productivity and capability of people with disability. This was reflected in the response to the Disability Royal Commission’s (DRC) Issues Paper on Employment, which found that these attitudes can result in people with disability being excluded from job opportunities, underestimated, and overlooked for promotions as well as leading to unconscious bias in recruitment procedures[[6]](#endnote-6). BCA welcomes the commitment by all levels of government to address these attitudes and misconceptions, through the Community Attitudes Targeted Action Plan under Australia’s Disability Strategy 2021 – 2031[[7]](#endnote-7).

In terms of data for people who are blind or vision impaired, the World Blind Union (WBU) conducted an employment survey with nearly 3,000 respondents. Approximately 30% of respondents resided in Oceania, including Australia. Statistics indicated similar trends to Australian data from 2019.

The WBU employment survey found 62.39% of respondents were currently employed, 14.32% not currently employed but employed within two years, and 31.67% unemployed long-term (not currently employed nor employed within two years). The respondents indicated that with their current level of vision or blindness they had the following amount of work experience:

* 42.79% had more than ten years,
* 22.39% six to ten years,
* 19.64% less than two years, and
* 15.27% two to five years[[8]](#endnote-8).

Similarly, research in 2018 conducted jointly by the CNIB Foundation, the Blind Foundation of New Zealand and Vision Australia found that Australia had the lowest rates of employment for people who are blind or vision impaired, with only 24% of Australian respondents in full-time employment. This compares with Canada at 28%, and the UK at 32% of blind or vision impaired people in full-time employment[[9]](#endnote-9).

#### Barriers to Finding and Keeping a Job

In consultation with members BCA received numerous reports of people’s inability to find and maintain employment. This can be related to a lack of willingness on the part of employers to hire a person who is blind or vision impaired, as well as a tendency for the methods used for the recruitment process to be inaccessible, effectively prohibiting people who are blind, or vision impaired from equitable participation. Many individuals report not getting beyond the interview stage of the recruitment process. In most instances people report that they are not provided with adequate feedback as to why they have been unsuccessful.

A person who is blind or vision impaired may not wish to disclose the fact that they have a disability prior to being selected for an interview; however, when they attend with a dog guide or another mobility aid, it becomes apparent that the candidate has a disability. This causes significant confusion as to whether the reason the person has not progressed is due to their disability.

“After completing university, it took me 5 years before I could gain employment. I was able to get the interviews but unable to secure employment as a Social Worker. None of my sighted peers struggled for 5 years to gain employment.”

It is crucial that online systems that are used in recruitment need to be compatible with screen-readers and voice navigation, to ensure equity of access. Selection methods must likewise be accessible and equitable. This includes ensuring disability awareness training for people involved in the selection process.

Similarly, people who are blind or vision impaired who are employed shared the difficulties they have faced in keeping their job, due to lack of flexible and accessible work and/or IT systems.

“They said that I should have told them that I had a disability when I applied for the job. When I said that I was not obliged to do so, under the law, nor did I think it was necessary to inform them, as it was a work from home position, they stated that the access issues were my own fault for not telling them I had a disability. They subsequently terminated my employment, stating that I was unable to fulfil the inherent requirements of the position.”

This is despite Australia having adopted the Accessible Information and Communications Technology (ICT) Procurement Standards in 2016. This standard is meant to ensure that all Australian ICT systems will meet accessibility standards. It also provides a benchmark for private enterprise to ensure that the systems they are procuring comply with a standard of accessibility, to ensure any prospective employees with a disability can utilise them.

Another person reported that they were placed under significant pressure by their employers to resign from their job, after they had vision testing conducted at the discretion of the employer. The testing identified that the person was legally blind.

“I refused to resign. I was then told I would be placed on sick leave pending an investigation, into what I still don’t know. I completed the sick leave form with the section for Illness stating, ‘Asked to leave the premises by shift manager, as I have been declared legally blind’. The Shift Manager initially refused to sign or give me a copy of the form but relented. I commenced sick and annual leave for the next 8 months as this is what I had accumulated over my employment.

I provided information on alternative roles I could perform, with little if any reasonable adjustment. They refused on the grounds they were cutting back staff in these alternative roles and could not give me one, when others were being asked to leave.

[In subsequent meetings] … my employer brought senior HR managers from Sydney, who again directed me to resign, and I again refused. I ensured I had a support person with me at every meeting I was summoned to… [later on] …my employer heard from the lawyer I had engaged and rapidly offered me a Total Permanent Disabled Benefit, from the superannuation scheme. I accepted.”

One member concluded aptly, “I feel that there are so many times when its easiest for an employer to end a contract, or for things to get so bad that the blind person will resign from a job [rather than make adjustments]”.

**Recommendation:**

1. All workplace training and recruitments processes (including interviews) must be accessible in order to ensure all candidates can equitably participate and have the same opportunity that is given to other candidates. This includes ensuring that IT components of interview processes are compatible with screen-readers and voice navigation software and that online components of interview processes meet Website Content Accessibility Guidelines (WCAG) 2.0.

#### Employer Attitudes

A literature review on employers’ attitudes toward hiring and retaining people with disability, consisting of 34 studies from 1987 through to 2012, found that employers hold “relatively positive attitudes” about people with disabilities[[10]](#endnote-10). The research highlighted 13 studies that found employers held positive attitudes towards people with disabilities. This included highly rating employees with disabilities, comparative to employees without disabilities, for desirable traits for their workplace (e.g., dependability, stability, and potential for success). Further, employers who had already employed people with disabilities, held positive attitudes about employing others with disabilities.

However, these positive attitudes did not translate into the hiring and retention of people with disabilities in workplaces. The research indicated that employers are inclined to hire a candidate without disabilities, comparative to a candidate with disabilities, when both candidates have identical experience and qualifications. Further, respondents to studies indicated that employers have major concerns about work performance, including concerns about work completion, fear of litigation and associated costs, perceived safety risks for employees and co-employees, and perceived greater absences from work[[11]](#endnote-11).

In 2016, Vision Australia conducted research into the experiences of employers who have employees who are blind or vision impaired, to understand employer attitudes towards employing them. 41 respondents representing 21 businesses completed the survey. Out of these, 56% were large organisations employing over 500 people. 90% of all respondents indicated that someone with disability worked at their workplace.

Employers were recruited through staff contacts and the networks of the Australian Network on Disability. It must be therefore noted that employers generally already were predisposed to hold positive attitudes to employing people with disabilities. Nevertheless, the survey shed light on what employers view as the biggest barriers to employing people who are blind or vision impaired:

* 20.60% said that adjustments and technology needed to employ a person with severe vision loss may be too expensive.
* 14.7% said the person may require adjustments to our building or computer systems which are disruptive.
* 11.8% said a person who was blind or vision impaired may be less efficient than other staff members.
* 14.7 % said the job requires vision[[12]](#endnote-12)

The results of this research clearly reflect the feedback BCA has received from people who are blind or vision impaired when they reflect on their employment experiences.

**Recommendation**

1. Extensive workplace training, including expert advice from people with disabilities and disability advocacy organisations, should be provided to all employers to combat negative attitudes toward people with a disability within the workplace.
2. Ensure DES staff understand and can explain to potential employers how adaptive equipment is used (including allaying fears of how this might impact on other workers), what modifications might be required, and how to make the role accessible.

#### Intersectional experiences in Employment

It is especially important to reflect on the intersectional experience in employment participation of people who are blind or vision impaired who may also identify as First Nations, culturally and linguistically diverse (CALD), LGBTIQA+, and/or women.

In our consultations, members shared their experiences of this intersectionality. We heard that equity measures to ensure quotas of employment do not necessarily equate to people who are part of multiple minority groups.

“An organisation advertised for 200 NDIS Local Area coordinator (LAC) positions. The job advertisement stated that ‘If you are a woman, person with disability, or from an Aboriginal or Torres Strait Islander background, or, from a CALD background, you are strongly encouraged to apply for these positions.’ I am a woman with a disability from a CALD background, with many years of work experience, working with refugees, migrants, and people with disability, in various positions. I believe five or six other people who were blind had also applied for the positions, but none of us were employed.”

Another member reflected:

“when talking about employment for Aboriginal and Torres Strait Islander people, you need to look at the intersecting issues. Things like health, education, access to services all play a role. It is really hard for an Aboriginal person to get a full-time job. Take me for example; I have been working in the same job for 26 years. I’m still a casual.”

**Recommendations:**

1. Ensure intersectionality is considered when undertaking diversity and inclusion training, and introducing diversity and inclusion measures into workplaces. This includes measures that appropriately support First Nations people, people with disabilities, people identifying as LGBTIQ, people from CALD backgrounds, and women.

### 3.2 Employment Programs and Policies

#### Sheltered Workshops and Australian Disability Enterprises

In consultations, we heard from members who directly experienced being employed in Sheltered Workshops. Historically, Sheltered Workshops provided employment for people with disabilities. Many of these workshops were redesigned to operate in the form of business services, after the development of the Disability Services Act in 1986. The Sheltered Workshop model still exist in some places, now renamed as Australian Disability Enterprises (ADEs).

In their current iteration, ADEs claim to offer similar working conditions to other employers in attempt to provide employment opportunities to people with moderate to severe disability, in roles in areas such as: packaging, assembly, production, recycling, screen-printing, plant nursery, garden maintenance and landscaping, cleaning services, laundry services and food services. However, wages for the majority of supported employees are calculated using wage assessment tools under the Supported Employment Services Award 2020, which can result in a $3.50 minimum wage[[13]](#endnote-13).

The overarching experience for members engaged with ADEs is that of employment below one’s capability. No matter how an individual is employed, it is important that opportunities are evenly matched with experience and expertise.

**Recommendations:**

1. Employees working at an ADE should be entitled to the option to access a DES service to enable their transition to well-paid and/or open employment.

#### Disability Employment Services

Disability Employment Service (DES) providers can play an important role in helping a ‘would-be worker’ to get a foot in the door. However, many DES providers are not currently meeting the needs of jobseekers who are blind or vision impaired, and often have little understanding of how to best support a person who is blind or vision impaired to seek, gain and keep employment.

Feedback BCA received from members using DES highlighted an issue whereby people are being offered opportunities far below their capability or that is unrelated or incompatible with their career goals. One member commented:

“Too much focus [was] on them finding me ‘something’ and not enough on what I was skilled at and wanted to do… [The] consultants would tell me that they had a particular type of work and workplace instead of me having choice and control of my career plans.”

This lack of personalised support can lead to people becoming incredibly disenfranchised to the point that they opt out of receiving support to get a job and instead decide to try on their own, with mixed results. Members commented that for DES to be effective and useful, the support needs to be more hands on and tailored to the individual; and that qualifications, employment history and overall capability should be properly considered by DES providers when they are seeking employment opportunities for clients.

It is important that DES providers have a longer-term view and recognise that in some circumstances simply updating résumés and organising interviews is not the answer, particularly for people who have just lost their sight. A skilled employment consultant will know that sometimes the road back to employment will be a longer one that requires people new to vision loss to go through a process of grieving, re-skilling and learning to do work differently. However, this will only occur if DES staff dealing with clients who are blind or vision impaired have specialist technical understanding of their needs and capabilities, or ready access to this information.

It is worth noting that only one organisation exists in Australia that covers both blindness service provision and that is a DES provider. One member told us:

“Because most blind people are moved towards [this blindness service provider as] a DES if they are blind or vision impaired… I feel I wasn’t given choice and didn’t have a great experience and would have preferred another service.”

This issue is exacerbated due to other DES not having a thorough understanding of blindness, with members commenting that other DES programs don’t seem to have an “understanding on disability or blindness”. It is critical that more DES providers are trained in working appropriately with clients who are blind or vision impaired, to enable choice and control for people accessing employment services.

It is also crucial that a person’s location should not be barrier to accessing the support of a DES, and that all job seekers with disability should be able to access a DES regardless of where they live and receive comparable support to people living in metropolitan areas. This can be achieved through the use of technology such as videoconferencing, email and phone to maintain contact with jobseekers, and visits with jobseekers in their region or at a central location. Where a DES is unable to cover the town in which the jobseeker lives, the DES should aim to work in partnership with a local generalist employment service to assist the jobseeker to obtain work. To ensure jobseekers receive appropriate support, it is vital that all services (both DES and generalist employment services) provide staff training in supporting people who are blind or vision impaired, and with disability specific supports.

We believe the assistance provided by DES should include preparation programs for people who are blind or vision impaired to allow them to develop skills that are vital for the workplace.These programs would include orientation and mobility (O&M) training, IT training, job seeking and interviewing skills and other pertinent areas to prepare for employment.

DES support should also involve discussions when and how assistive technology can be used (including capacity to deliver or support training in this technology) and knowledge of relevant assessments, referrals, strategies, government subsidies and blindness specific resources which are available. We believe that longer term, the focus of DES should also include career counselling, knowledge of further education options and employment internships.

From the feedback we have received from members, we know that often work-related issues don’t arise until after the person has commenced employment. An employee with disability should be able to seek the support of a DES to help address these issues, even where they may not have used a DES to get their job in the first place. People who are currently in paid work due to the assistance of a DES may require the continued assistance of a DES to resolve work related issues, including a referral pathway for JobAccess. It is important that the availability of this support should not be linked to a timeframe such as the duration of a wage subsidy. Likewise, an employee with a disability who has exited a DES should be able to re-enter the same DES, and be assisted in a timely manner, to access the support they require

Seeking employment is particularly problematic for mature age jobseekers, as people over 65 are not eligible to access DES. A BCA member who is over 65 however who was accessing DES prior to turning 65 articulated his concern:

“As I am now over the age of 65, I am no longer eligible to join a DES. I am also not eligible for employment support through the National Disability Insurance Scheme due to my age…. One of my main concerns is that if for some reason Job Access ceased to exist or if I [were] inadvertently removed from my DES provider then I would have zero employment support available to me.”

BCA believes strongly that age should not be a barrier to access a DES and the criteria to join a DES should not be arbitrarily restricted by age, with the removal of the requirement that jobseekers must be under 65 years of age. This age limit should be reviewed in light of the increase in pension age eligibility, increased financial pressures to continue working and the desire by older employees to continue to remain in the workforce. An older jobseeker can have a lot to offer a potential employer and should be able to access the support of a DES as necessary.

We believe that a jobseeker should be able to choose their own DES. Whilst referrals by Centrelink to a DES are helpful for some individuals, the requirement to complete job capacity assessments and the limited range of DES providers offered by Centrelink can inadvertently increase hurdles to employment. Our members would welcome the opportunity to independently select and approach a DES of their own choosing.

**Recommendations:**

1. Qualifications, employment history and overall capability should be properly considered by Disability Employment Service providers when they are seeking employment opportunities for clients to ensure they are appropriately matched.
2. DES staff dealing with clients who are blind or vision impaired must have specialist technical understanding of their needs and capabilities, or ready access to this information
3. Location should not be barrier to accessing the support of a DES – all job seekers with disability, regardless of where they live, should be able to access a DES and receive comparable support to people living in metropolitan areas.
4. Develop workplace preparation programs for people who are blind or vision impaired – including orientation and mobility (O&M) training, IT training, job seeking and interviewing skills etc.
5. Ensure jobseeker with disability can receive the support of a DES, regardless of current employment status.
6. Remove the age restriction for accessing DES to help support people over the age of 65 to remain in the workforce
7. Ensure jobseekers can choose their own DES, and that a large enough provider market exists to allow a genuine choice

#### Job Access

Job Access is a scheme through the Department of Social Services (DSS) that provides the financial assistance to make accessibility adjustments in the workplace to enable people with disabilities to participate equitably in workplace activities. The adjustments might include physical accessibility changes or assistive technology. It can also provide disability awareness training to the workplace.

Feedback to BCA suggests Job Access is primarily used by its members to obtain assistive technology, to meet workplace requirements. There have been mixed reports on the quality of service received from Job Access. The success of Job Access appears to be highly dependent upon the relationship between the DES provider and Job Access. One member remarked that:

“The Job Access scheme, while it is very good, is not very well known. Some blind and vision impaired people don’t know the assistance is available. Employers don’t understand it or even know about it. I recommend better marketing of Job Access.”

There also appears to be some confusion as to the role of Job Access. Members told us that in employment situations if the problem they have encountered is a technological one, employers seem to think that the issue will always be able to be solved by the right adaptive technology. They do not seem to understand that sometimes the issue is with the accessibility of their own IT systems and not the adaptive technology.

We also note there is also a problem with Job Access not recognising the need to upgrade or replace adaptive technology, due to constantly changing technology. This has been a continuing point of frustration for BCA members.

“I have many instances where I link up with Job Access, where it has taken 3 months to get the assistive tech that I needed in the role. When organisations change or upgrade [their systems], the tech isn’t accessible.”

The issue of procuring assistive technology is substantial. If someone has utilised Job Access previously to obtain assistive technology, if an update is needed to be compatible with IT systems, people have run into issues procuring the updated technology.

“I needed a braille display so I could work in our database, I had acquired one in a previous role through Job Access. As a result, they would not fund a new braille display. But because it was 5 years old it wasn’t compatible with Windows 10”

**Recommendations:**

1. Encourage workplaces to make use of the Job Access scheme to ensure the procurement of appropriate assistive technology and other workplace modifications are undertaken to allow people with disabilities to do their jobs effectively.
2. Educate workplaces on their responsibility for ensuring that any assistive technology procured through Job Access is compatible with their IT systems.

### 3.3 Improving employment participation for people with disabilities

#### Strengthening Disability Discrimination Act

In feedback from members, we heard that the Disability Discrimination Act 1992 (DDA) does not appear to be robust enough to provide adequate protections for people who are blind or vision impaired in the workplace.

According to the Australian Institute of Health and Welfare, “Reasonable adjustment is implicit in the requirement to avoid indirect discrimination under section 6 of the DDA. If a person with disability needs some form of workplace adjustment to be able to work, or to be able to participate equally in some aspect of working life, and that adjustment could reasonably have been provided, but was not, then a finding of indirect discrimination could follow.” [[14]](#endnote-14)

Clearly, many of the experiences described in this paper are a breach of this requirement; however, litigation claims about disability discrimination in the workplace are financially and emotionally costly, and many people will not have the resources to fight such a claim.

One member reflected on their experience of attempting to use the DDA to fight the disability they were encountering at work:

“This experience has brought home to me the need to tighten the Disability Discrimination Act, in order to prevent organisations simply being able to tick boxes, to demonstrate that they have done everything possible to make the working environment accessible, when in fact, they have done nothing at all.”

In considering whether the DDA has made a significant impact upon eradicating discrimination in employment for people who are blind or vision impaired, a former Human Rights Discrimination Commissioner directly corroborates the experiences of those who contributed their experiences to BCA:

“…in my view there are few instances apparent of settlement of or decision in employment complaint cases under the DDA which have actually had broad and significant impact in achieving the elimination of discrimination (the major object of the DDA) rather than simply providing an individual remedy (which while important does not appear among the objects of the DDA in its own right)”.[[15]](#endnote-15)

We believe strengthening the DDA to enable the act to have a legislative consequence would cause employers to take seriously their responsibilities, and act to remove some of the systemic barriers to employment for people who are blind or vision impaired – and other people with disability.

**Recommendations:**

1. Strengthen the DDA to ensure people with disabilities are protected in the workplace by adopting a legislative requirement to remove systemic discrimination, rather than existing simply as a remedy for specific discrimination cases. This includes allowing appropriate penalties to be issued for workplaces that clearly breach the DDA.

#### A supportive work environment

For someone who is blind or vision impaired, the best chance at keeping a job and having a successful employment experience is largely reliant on how supportive a potential employer is about accessibility needs – including being willing to make appropriate workplace accommodations. It is therefore vital that DES staff assisting job seekers to find employment should be able to explain to potential employers, in a clear and easy to understand manner, how equipment is used (including allaying fears of how this might impact on other workers), what modifications are required to systems, how to make the role accessible and how tasks can be completed differently.

DES should also be able to inform employers of the potential costs, if any, of making modifications. Where possible, DES providers should seek to include jobseekers in discussions with potential employers from early on in the process, to enable the individual to speak about their own accessibility needs.

Many people who are blind or vision impaired also have a better experience in the workplace when they have a designated contact person at work, other than their direct supervisor, who they can connect with regularly for any issues to do with accessibility, as a way to help provide a smooth transition to the organisation and an ongoing positive experience.

**Recommendations:**

1. Include jobseekers in discussions with potential employers wherever possible.

#### Employment Preparation Programs

Preparation programs for employment are designed to equip people with disability to develop appropriate skills, tailored toward achieving their goals. Members reported mostly positive experience in gaining experience and skills:

“When I was in a DES, they put me in contact with [a program that] … took time to engage me, talk about skills, motivators, what I wanted out of it, what I had to offer. I found them helpful and they had my back. They got me experiences that were linked to my passion, I wasn’t limited to what they thought was attainable but what was of interest and importance to me. It’s important to note that this agency is no longer funded, and I am unable to use them in the future”

Equipping people prior to entry into a workplace is a process which could help to foster positive experiences within the workplace, once an employee who is blind or vision impaired gains work in their chosen field.

#### Disability Awareness Training

Disability awareness training programs that focus on employing or working with a person with a disability are essential. Most disability awareness training packages focus mainly on providing service to customers who have a disability, rather than providing sound information and strategies on how to employ and retain an employee with a disability.

Through funding provided to BCA as part of the Information, Linkages and Capacity Building (ILC) Grant[[16]](#footnote-1), BCA created ‘An Eye to the Future’ – a program that takes a unique approach to removing barriers to employment for people who are blind or vision impaired through education, cultural changes, organisational awareness and development, and capacity building for future success. This includes:

* A series of videos which highlights the careers and workplace successes of people who are blind or vision impaired.
* Online resources and a series of business webinars to support organisations and HR professionals ensure accessibility throughout recruitment and employment processes.
* Online resources and a series of webinars for people who are developing their job readiness skills and overall employability focusing on job seeking, resumes, cover letters, and interview skills.
* Creating paid employment opportunities for people who are blind or vision impaired with partner organisations.
* Providing mentorship to job seekers who are blind or vision impaired entering the workforce.

By providing relevant information, support and resources, the program helps equip each employer with the best available toolkit to ensure people who are blind or vision impaired will be welcome and supported in their organisation. The program also helps ensure individuals working with An Eye to the Future can step into paid employment with confidence and relevant support.

**Recommendation:**

1. Ensure the ILC grant program (now administered by DSS) is appropriately resourced to continue to provide funding for disability representative organisations to develop disability awareness training.

#### Work Experience

Young people are the future of this country. Government has a role to play to ensure that people who are blind or vision impaired, especially young people, are provided with the educational and employment skills necessary to be able to contribute economically.

A structured work experience is generally a part of secondary education in upper grade levels, and provides students a valuable opportunity to build social skills, and to understand different workplaces and practices. However, historically, work experience opportunities were less readily available to many students who were blind or vision impaired. Members who missed out on this experience have told us:

“Often, we don’t the chance to do paid work through school like our peers (think retail or fast food) which means we miss out on developing some very important life and work skills”.

We believe the scope for DES providers should be broadened so they can assist students and job seekers through work experience programs, or through internship type experiences in other similar programs.

**Recommendation:**

1. Encourage DES providers to offer work experience or other internship type programs to help build social skills, and understand different workplaces and practices.

#### Pre-employment training

After securing employment, workplace training is often needed to ensure a person who is blind or vision impaired can achieve their work goals. Unfortunately, members have consistently reported a lack of appropriate skills training in their workplaces. One member discussed the difficulties they can face when they are being trained on the job by someone who does not understand the needs of people who are blind or vision impaired:

“If I’m learning a new system or process on a computer they say things like ‘double click the icon on the computer’, I can’t see the icon, and I don’t use a mouse. I use screen readers NVDA and JAWS that uses key strokes. So, having training from someone who is blind or understands the use of screen readers would be much more beneficial.”

It is therefore crucial that training is delivered by peers who are blind or vision impaired, or external trainers with specific knowledge and skills of the types of devices and programs used by people who are blind or vision impaired. BCA understands that even employers who are genuinely committed to improving employment outcomes for people with disability may struggle with the financial costs of such training and believe this should be supported by DES or Job Access.

**Recommendations:**

1. Ensure workplace training is delivered by peers who are blind or vision impaired, or by external trainers with specific knowledge and skills of the needs of people who are blind or vision impaired.

#### Leadership by people who are Blind or Vision Impaired

People who are blind or vision impaired must also have appropriate opportunities for career progression. BCA believes the promotion of people with disabilities into leadership positions is important in developing a culture of accessibility and diversity in a workplace. Employment quotas generally exist for entry level employment; however, it is critical that people with disabilities are offered opportunities at all levels of management. At present, there is a distinct lack of representation of people with disabilities in higher leadership positions and on boards of organisations. Part of improving this involves ensuring ongoing professional development and leadership training is offered in an accessible way. If a training package is not accessible, this often means a person with disability will be unable to complete it.

Under Australia’s Disability Strategy (2021 – 2031), sits targeted action plans, one with a focus on community attitudes. While consultations suggest there has been recent perceived improvement in community attitudes towards people with disability and an increased awareness of disability, there is still much to be done across a number of sectors including health and education. People with disability continue to experience avoidance, discrimination, violence and abuse, hostility and low expectation, preventing active and meaningful social inclusion and participation in many aspects of society.[[17]](#endnote-16)

Yearly progress reports on the implementation of targeted action plans will be published, and should be monitored by all relevant government bodies, including the education and employment portfolios.

We would also like to see DES launch an employment mentoring program. This program would pair people who are blind or vision impaired, who are either seeking employment, or newly employed. The mentor would be matched based on their expertise, to the mentee. The mentor would be a person who is also blind, or vision impaired who can provide guidance to the mentee

**Recommendations:**

1. People who are blind or vision impaired must have appropriate opportunities for career progression and leadership development
2. Support DES providers to launch an employment mentoring program for blind and vision impaired job seekers.

## 4. Summary of Recommendations

BCA makes the following recommendations:

1. All workplace training and recruitments processes (including interviews) must be accessible in order to ensure all candidates can equitably participate and have the same opportunity that is given to other candidates. This includes ensuring that IT components of interview processes are compatible with screen-readers and voice navigation software and that online components of interview processes meet Website Content Accessibility Guidelines (WCAG) 2.0
2. Extensive workplace training, including expert advice from people with disabilities and disability advocacy organisations, should be provided to all employers to combat negative attitudes toward people with a disability within the workplace.
3. Ensure DES staff understand and can explain to potential employers how adaptive equipment is used (including allaying fears of how this might impact on other workers), what modifications might be required, and how to make the role accessible.
4. Ensure intersectionality is considered when undertaking diversity and inclusion training, and when introducing diversity and inclusion measures into workplaces. This includes measures that appropriately support First Nations people, people with disabilities, people identifying as LGBTIQ, people from CALD backgrounds, and women.
5. Employees working at an Australian Disability Enterprise (ADE) should be entitled to the option to access a DES service to enable their transition to well-paid and/or open employment.
6. Qualifications, employment history and overall capability should be properly considered by Disability Employment Service providers when they are seeking employment opportunities for clients to ensure they are appropriately matched.
7. DES staff dealing with clients who are blind or vision impaired must have specialist technical understanding of their needs and capabilities, or ready access to this information.
8. Location should not be barrier to accessing the support of a DES – all job seekers with disability, regardless of where they live, should be able to access a DES and receive comparable support to people living in metropolitan areas.
9. Develop workplace preparation programs for people who are blind or vision impaired – including orientation and mobility (O&M) training, IT training, job seeking and interviewing skills etc.
10. Ensure jobseeker with disability can receive the support of a DES, regardless of current employment status.
11. Remove the age restriction for accessing DES to help support people over the age of 65 to remain in the workforce.
12. Ensure jobseekers can choose their own DES, and that a large enough provider market exists to allow a genuine choice.
13. Encourage workplaces to make use of the Job Access scheme to ensure the procurement of appropriate assistive technology and other workplace modifications are undertaken to allow people with disabilities to do their jobs effectively.
14. Educate workplaces on their responsibility for ensuring that any assistive technology procured through Job Access is compatible with their IT systems.
15. Strengthen the DDA to ensure people with disabilities are protected in the workplace by adopting a legislative requirement to remove systemic discrimination, rather than existing simply as a remedy for specific discrimination cases. This includes allowing appropriate penalties to be issued for workplaces that clearly breach the DDA.
16. Include jobseekers in discussions with potential employers wherever possible.
17. Ensure the ILC component of the NDIA (now managed by Department of Social Services) is appropriate resourced to continue to provide funding for disability representative organisations to develop disability awareness training.
18. Encourage DES providers to offer work experience or other internship type programs to help build social skills, and understand different workplaces and practices.
19. Ensure workplace training is delivered by peers who are blind or vision impaired, or by external trainers with specific knowledge and skills of the needs of people who are blind or vision impaired.
20. People who are blind or vision impaired must have appropriate opportunities for career progression and leadership development.
21. Support DES providers to launch an employment mentoring program for blind and vision impaired job seekers.
1. Vision2020. *Eye health in Australia*. <http://www.visioninitiative.org.au/common-eye-conditions/eye-health-in-australia> [↑](#endnote-ref-1)
2. United Nations. *Convention on the Rights of Persons with Disabilities – Article 27*. <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-27-work-and-employment.html> [↑](#endnote-ref-2)
3. Second Progress Report to the Council of Australian Governments 2016 https://www.dss.gov.au/sites/default/files/documents/01\_2019/final-national-disability-strategy-2016-progress-report-pdf.pdf [↑](#endnote-ref-3)
4. Australia’s Disability Strategy 2021-2031. *Employment and Financial Security*. <https://www.disabilitygateway.gov.au/sites/default/files/documents/2021-11/1781-australias-disability.docx> [↑](#endnote-ref-4)
5. Australian Institute of Health and Welfare. (2019, September 3). *People with disability in Australia. Workplace arrangements. Australian Government*. <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/employment/employment-participation-needs-and-challenges/workplace-arrangements> [↑](#endnote-ref-5)
6. Disability Royal Commission. *Overview of Responses to the Employment Issues Paper*. <https://disability.royalcommission.gov.au/system/files/2022-03/Overview%20of%20responses%20to%20the%20Employment%20Issues%20paper.docx> [↑](#endnote-ref-6)
7. Disability Gateway. *Community Attitudes Targeted Action Plan.* <https://www.disabilitygateway.gov.au/sites/default/files/documents/2021-12/1871-tap-community-attitudes.docx> [↑](#endnote-ref-7)
8. World Blind Union. (2020, June 16). *WBU Employment Committee report* [↑](#endnote-ref-8)
9. Vision Australia. 2019. *Survey shows blind people significantly underemployed around the world*. <https://www.visionaustralia.org/news/2019-08-23/survey-shows-blind-people-significantly-underemployed-around-world> [↑](#endnote-ref-9)
10. Burke, J., Bezyak, J., Fraser, R. T., Fraser, Pete, J., Ditchman, N. & Chan, F. (2013). *Employers’ attitudes towards hiring and retaining people with disabilities: A review of the literature. Australian Journal of Rehabilitation Counselling*. <https://doi.org/10.1017/jrc.2013.2> [↑](#endnote-ref-10)
11. Ibid. [↑](#endnote-ref-11)
12. Australian Network on Disability. (2016). *Vision Australia's Employer Attitudes Survey 2016*. <https://www.and.org.au/pages/vision-australias-employer-attitudes-survey-2016.html> [↑](#endnote-ref-12)
13. Australian Government Department of Social Services. *Supported Employment.* <https://www.dss.gov.au/disability-and-carers-programs-services-for-people-with-disability/supported-employment> [↑](#endnote-ref-13)
14. Australian Institute of Health and Welfare, 2015 [↑](#endnote-ref-14)
15. Sidoti, A. (1998, September 26). *The DDA and employment of people with a disability.* [https://humanrights.gov.au/about/news/*speeches*/dda-and-employment-people-disability](https://humanrights.gov.au/about/news/speeches/dda-and-employment-people-disability) [↑](#endnote-ref-15)
16. ILC was originally part of the National Disability Insurance Agency (NDIA) but since 2020 it has been administered by the Commonwealth Department of Social Services (DSS) [↑](#footnote-ref-1)
17. Australia’s Disability Strategy 2021 – 2031 Community Attitudes Targeted Action Plan <https://www.disabilitygateway.gov.au/document/3141> [↑](#endnote-ref-16)