# Welfare Review Submission Template

## Pillar One: Simpler and sustainable income support system

Changes to Australia’s income support system over time have resulted in unintended complexities, inconsistencies and disincentives for some people to work. Achieving a simpler and sustainable income support system should involve a simpler architecture, a fair rate structure, a common approach to adjusting payments, a new approach to support for families with children and young people, effective rent assistance, and rewards for work and targeting assistance to need.

### Simpler architecture

**Page 42 to 52** of the Interim Report considers the need for a simpler architecture for the income support system. The Reference Group proposes four primary payment types and fewer supplements. The primary payment types proposed are: a Disability Support Pension for people with a permanent impairment and no capacity to work; a tiered working age payment for people with some capacity to work now or in the future, including independent young people; a child payment for dependent children and young people; and an age pension for people above the age at which they are generally expected to work.

In shaping the future directions for a simpler architecture the Reference Group would like feedback on:

* What is the preferred architecture of the payment system?
* Should people with a permanent impairment and no capacity to work receive a separate payment from other working age recipients?
* How could supplements be simplified? What should they be?
* What are the incremental steps to a new architecture?

| The report proposes a simpler payment system with four basic payment types and fewer supplements. Vision Australia believes that the proposal has merit provided the level of existing supports are not negatively impacted, and the new system will ensure that the level of income support adequately meets the full cost of a persons’ disability in the future.  Regardless of employment status, access to the Disability Support Pension and other supplements, including the Mobility Allowance (higher rate), various study allowances, and Utilities and Telephone Allowances, provide a person who is blind with some means to meet the non-optional costs of blindness, which include costs of:   * travel and mobility – such as taxi transport, use of and care of dog guides, GPS technology; * buying adaptive technology – which provides access to information and communication; * living (higher rent, higher council rates, higher home purchase prices, etc.) in an area with good infrastructure such as public transport, schools, child care facilities, libraries, and shops – since people who are blind or have low vision are unable to drive to such facilities; * self-care and maintenance – including equipment to meet standards of presentation; * accessible information support and accessing and completing government forms and education and training items, etc. – which involves greater time required and in some instances support from someone who is sighted; * paying for medical equipment such as some eye-drops, sunglasses and contact lenses – which may allow use of, or help protect any residual vision and is not subsidised; * operating, maintaining and upgrading adaptive and assistive technology and equipment (eg repairs, batteries, software).   Other relevant supplements in relation to blindness and low vision include: Child Disability Assistance Payment, Youth Disability Supplement, and Carer Allowance. These supplements recognise added income support costs associated for a person who is blind or has low vision, for people who care for people with vision impairment, and for people transitioning between life stages into training, education and employment.  The DSP currently pays a maximum rate of $21,500 (singles) and $32,500 (couples) per year. For singles, $751.70 per fortnight of this payment represents the maximum base rate (up to $75.40 through other supplements). Private renters may also be eligible for Rent Assistance (Commission of Audit - Australian Government, 2014). The DSP (blind) is non means tested, and for good reasons. Any assertion that this level of income support acts as a disincentive to look for, or participate in, employment is absolutely rejected by Vision Australia and by people who are blind or have low vision. Any new payment system must be adequately designed to ensure that a person who is blind or has low vision is able to maintain a standard of living above poverty while facilitating employment opportunities.  We support the Government moves to simplify the system including merging payment categories and supplements where it can be shown a person is still able to access adequate income support relevant to their needs and stage in their life – and that no-one is worse off as a result of any changes, now and into the future.  We believe that the consumer must also benefit from any streamlining of the architecture – and therefore changes should as far as possible be clearly and simply articulated and easily able to be compared and accessed as appropriate. We also believe that there should be appropriate communication of the changes to people who are blind or have low vision in accessible formats not limited to print.  We support the proposal to separate out permanent impairment and no capacity to work from other working age recipients as part of broader improvements in disability policy, supported by targeted assistance to develop job capacity. We would like to see what supports the Government is proposing in this area, outside of the NDIS.  In relation to the proposal that supports for people who have a partial capacity to work would be provided through a tiered working age payment, we note that many people who are blind or have low vision are unemployed or underemployed. Vision Australia’s Employment report 2012 found that 58% of respondents are unemployed not by their own choice and are four times more likely to be unemployed compared to the general population (64% unemployed). One third of those who are employed would like to work more hours highlighting an issue of underemployment for people who are blind or have low vision. We submit there should be a higher rate for people who have a partial capacity to work, as well as appropriate access to supplements, and further support to build capacity and capability. |
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### Fair rate structure

**Page 55 to 60** of the Interim Report considers changes that could be considered to rates of payment for different groups. In shaping the future directions for a fairer rate structure the Reference Group would like feedback on:

* How should rates be set, taking into account circumstances such as age, capacity to work, single/couple status, living arrangements and/or parental responsibilities?

| Disability leads to costs that other sections of the community do not have to meet in order to work, or look for work, as well as raise and support children. There should be effective and transparent ways of assessing and ensuring these costs can be adequately met, in addition to providing income support to meet the costs that all people face. People with disability face a “double whammy”, withy increased costs of living, and generally lower rates of income.  For a person who is blind or has low vision, finding employment is not necessarily a straightforward activity of going online to “Seek” or online job search sites, or easily travelling from A to B where the environment may be unfamiliar, inaccessible or too expensive to reach. There is also a general prejudice, discrimination, lack of understanding and nervousness in the population, including employers that make life difficult for a person with a disability.  Vision Australia supports targeted higher working age payments including for people with a disability with no, or partial, capacity to work. We support the proposal to pay the costs of meeting participation requirements – which for a person who is blind or has low vision may involve numerous costs including:   * transport to and from the relevant employment or training location or meeting, * locating the relevant area where the participation activity is taking place, * becoming familiar with and moving around safely and independently in a new environment, * using any equipment (if required) safely, * ensuring access to appropriate technology and information to participate in the participation requirement activity, * reading and completing forms and other administrative/compliance requirements of the participation activity process * operating, maintaining and upgrading adaptive and assistive technology and equipment (eg repairs, batteries, software licenses).   We have provided in our earlier answer a description of some of the non optional costs of blindness in relation to cost of living or income support. A further example to illustrate the non optional costs is a person who is blind undertaking home repairs or installing a shelf themselves for home storage purposes. A tape measure to determine location and height would ordinarily cost $8 from a hardware store such as Bunnings, would cost in the order of $120 to provide speech output and memory functions that would facilitate do-it-yourself cost of living activities.  Non-optional costs of blindness and low vision are various, significant, and at times overwhelming. We ask you to consider these items when developing proposals for setting of new rates. We also note that when a person has more than one disability (for example, blindness and a hearing impairment, or low vision and a hearing impairment) these non-optional costs can dramatically escalate.  Some of these non-optional costs result from systemic discrimination in the form of barriers to full and independent participation that have existed for many years and which are only slowly being addressed. Effective mechanisms have not yet been developed or evolved to allow people who are blind or have low vision to interact independently with government and other public bodies.    Other major issues to consider when developing rates include:   * How rates relate to programs that provide advice and assistance to people with disability to prepare for, find and maintain jobs, including the development of industry-specific or workplace-specific knowledge and skills (e.g. job applications, on-the-job training, and career development); * Separation from employer support services and programs that encourage and assist employment of people with disability (e.g. support, training and resources for employers, funding to make reasonable adjustments, and wage subsidies); * Workplaces specific supports (including modifications, employment-specific aids and equipment); * Support for general employment-related planning and support (e.g. retirement planning, careers counselling). * The new system should also take into account that without major periods of employment throughout one’s life, the ability to save money, build assets and contribute to superannuation is seriously impacted. For a person with disability on welfare and in debt, purchasing everyday essentials becomes impossible. |
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### Common approach to adjusting payments

**Page 60 to 64** of the Interim Report considers a common approach to adjusting payments to ensure a more coherent social support system over time. In shaping the future directions for a common approach to maintaining adequacy the Reference Group would like feedback on:

* What might be the basis for a common approach to adjusting payments for changes in costs of living and community living standards?

| We assume that the pension and rates will be increased as per our previous answer – taking into account the extra costs involved for someone with a disability.  Under the Federal Budget announced in 2014, from September 2017, all pensions, including the Disability Support Pension and Carer Payment, will be indexed against CPI rather than Male Total Average Weekly Earnings. This will result in a lower annual rate of income growth for people whose financial means are already very limited.  There must be some protections built into the adjustment process and we ask you to consider a mechanism that provides a balance to ensure people who are already significantly disadvantaged such as people with a disability do not have their means of living fall further behind the general community.  Potentially there could be an option that finds a balance between CPI and changes in community living standards.  We also support there being a regular review conducted that includes opportunity for consumers and sector to provide their views and experiences. |
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### Support for families with children and young people

**Page 65 to 68** of the Interim Report considers how the payments could be changed to improve support to families with children and young people. In shaping the future directions for support for families with children and young people the Reference Group would like feedback on:

* How can we better support families with the costs of children and young people to ensure they complete their education and transition to work?
* In what circumstances should young people be able to access income support in their own right?

| Vision Australia agrees that costs can increase for children as they grow, but we do note that effective early investment can reduce costs over time. We also support the provision of supplements to assist with the costs of living away from home to study, living in a remote location and living in more than two households.  We support the retention of the Disability Support Pension and allowances for people aged 16 years old and older who are blind – now and into9 the future. We would support moves that assist younger people to move into appropriate training and employment opportunities and pathways – transitioning to an independent life.  We believe that a person who is blind or has low vision at the age of 16 years old should have access to appropriate supports to make their own way in life.  Vision Australia’s Employment report 2012 found that, “*Respondents under the age of 25 were asked about their participation in school work experience programmes. 78% of participants were involved in some form of work experience (consistent with 80% in 2007). Half of the respondent (52%) who participated in school work experience found their job with the help of their school, while one third (34%) found it by themselves.*  *64% of respondents who participated in school work experience are currently employed in some capacity suggesting the positive effect of work experiences during school years on making young people who are blind or have low vision more easily employable.*” (NB – relatively small respondent base). |
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### Effective rent assistance

**Page 68 to 71** of the Interim Report considers Rent Assistance and suggests a review to determine the appropriate level of assistance and the best mechanism for adjusting assistance levels over time. In shaping the future directions for Rent Assistance the Reference Group would like feedback on:

* How could Rent Assistance be better targeted to meet the needs of people in public or private rental housing?

| Vision Australia accepts that people in private rental may face higher accommodation costs which may impact their other available income to meet the other costs of living.  For a person who is blind or has low vision, costs (higher rent, higher council rates, higher home purchase prices, etc.) of living in an area with good infrastructure such as public transport, schools, child care facilities, libraries, and shops (since people who are blind or have low vision are unable to drive to such facilities) are higher.  Vision Australia supports increased and better targeted rent assistance for people receiving income support that acknowledges the above. |
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### Rewards for work and targeting assistance to need

**Page 72 to 78** of the Interim Report considers changes to means testing for improved targeting to need and better integration of the administration of the tax and transfers systems to improve incentives to work. In shaping the future directions for rewards for work and targeting assistance to need the Reference Group would like feedback on:

* How should means testing be designed to allow an appropriate reward for work?
* At what income should income support cease?
* What would be a simpler, more consistent approach to means testing income and assets?

| The issue of means testing for income support is of particular concern to Australians who are blind. In Australia, the DSP (blind) is non means tested – and over the years since its introduction in 1954, there have been various inquiries on this issue. In 2014, the issue of non means testing of the blind pension has again been raised, bringing fear and outrage to people who are already socially and financially disadvantaged. Any change to this will have significant effect on both current and future recipients. Our utmost support for the retention of non means testing, for existing and future recipients of the DSP (blind) remains steadfast for good reasons:   * The basic payment is modest - providing a small financial buffer to the additional daily personal bill of blindness. Each and every cost of living item including transport, home location and maintenance, personal care, or equipment for communication and daily living is greater for a person who is blind. * Delivers substantial taxpayer benefits - by directly allowing an individual with blindness to access goods and services associated with living, working or looking for a job without the intervention of a third party. The DSP (blind) is a highly efficient form of payment that enables an individual to exercise control over their life and in doing so avoid greater costs that would flow to taxpayers through alleviation of the need for more intensive third party interventions. * Received by a very small number of people - There are 357,000 Australians dealing with blindness in 2013, of whom 123,000 are aged 18-64 years old. The DSP (blind) is claimed by just 12,000 Australians (according to 2012 FAHCSIA figures). Of these, 36% may be employed, of whom less than half have income of more than $1000 per week (including DSP blind pension). * Not a disincentive to work - it has been wrongly argued non means tested payments act as a disincentive for employment. People who are blind want to work. Many people who are blind or have low vision work part time due to personal and structural reasons, not because they receive a modest payment. In reality, the non means tested DSP provides the necessary support to meet additional costs, enable greater individual capacity to maintain and search for employment, and undertake career development. * Removal may jeopardise those already in employment – by reducing income required to meet the costs of their current employment such as getting to and from work using taxis. * Unjust imposition on a couple - to apply a means test on DSP (blind) for a couple would reduce the independence of the individual who is blind, make them reliant on the partner and add personal cost to the family, as they strive to meet costs of living, employment search and participation activities. * For those who receive it, the individual cost of their blindness comprehensively outweighs any possible benefit accrued in receiving this income support – the individual cost of blindness is significant. For people over 40 years old with blindness, the report "*Clear Focus - the economic impact of vision loss 2009*", produced by the Centre of Eye Research Australia ( CERA) and ACCESS Economics concluded that for vision impairment: Risk of falls doubled; Risk of depression tripled; Risk of hip fractures increased four to eight times; and social independence halved. This applies for people who are blind and in employment.   Income support must continue to be provided to people with a disability who are working. For a person who is blind or has low vision, the cost of participating in work can potentially outweigh the income received. We have outlined previously some of the non-optional costs of blindness relevant to employment. Without the support of the Disability Support Pension, many people currently in work may find themselves in precarious financial positions that reduce their capacity to participate in economic and social activities, and impact their physical and mental wellbeing. The current Disability Support Pension provides a small and modest buffer that enables a person who is blind or has low vision to meet their increased living costs and participate in work or training opportunities. We believe any simpler approach to means testing must be balanced by understanding and addressing the costs and benefits of current arrangements impacting people who are blind or have low vision.  Vision Australia believes that placing a retrospective means test on existing pension recipients is likely to cause significant hardship as financial decisions have already been made, for example, around rental accommodation, mortgages, loans and existing lifestyles. To remove a substantial component of an individual’s budget is likely to have substantial impact on people's ability to repay debts and existing liabilities. Banks include the pension in calculations and borrowings have been based on this. Vision Australia also believes the approach to increasing employment opportunities needs to be put in place before considering changes to the safety net provided by the current arrangements. Further, any changes should be phased in, not leave anyone worse off and be clearly communicated by government to consumers. Lastly, our concerns apply equally for people who are in receipt of the Aged Pension (Blind). |
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## Pillar Two: Strengthening individual and family capability

Reforms are needed to improve lifetime wellbeing by equipping people with skills for employment and increasing their self-reliance. To strengthen individual and family capability changes are proposed in the areas of mutual obligation, early intervention, education and training, improving individual and family functioning and evaluating outcomes.

### Mutual obligation

**Page 80 to 85** of the Interim Report considers more tailored and broadening of mutual obligation and the role of income management. In shaping the future directions for mutual obligation the Reference Group would like feedback on:

* How should participation requirements be better matched to individual circumstances?
* How can carers be better supported to maintain labour market attachment and access employment?
* What is the best way of ensuring that people on income support meet their obligations?
* In what circumstances should income management be applied?

| Vision Australia supports an increased focus on building employment capability – among individuals with a disability as well as employers including the small business and government sectors.  We support tailored, realistic and supportive mutual obligation arrangements which do not place overly burdensome or punitive arrangements on someone with a disability. For a person with a disability with participation requirements, a long term approach that fosters the individual as well as the workplace or training environment so that the individual and the prospective employer can work towards arrangements that facilitate an ongoing positive and productive relationship should be encouraged. The development of pathways, referral systems and provision of information and support should be built into the system.  Regard of the circumstances in which a person who is blind or has low vision is able to undertake education and training, the length of the training or course should also include some higher level of assistance that meets the additional costs to undertake the activity.  Application of sanctions should take into account the potential negative impact on someone with a disability who may have had a history of being shut out of activities and opportunities, and who without income support even for a short time may be at greater immediate and long term risk to their independence, safety and wellbeing. |
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### Early intervention

**Page 85 to 88** of the Interim Report considers risked based analysis to target early intervention and investment and targeting policies and programmes to children at risk. In shaping the future directions for early intervention the Reference Group would like feedback on:

* How can programmes similar to the New Zealand investment model be adapted and implemented in Australia?
* How can the social support system better deliver early intervention for children at risk?

| Vision Australia supports an early intervention approach and notes that the approaches cited within the interim report focus on children at risk and disadvantaged families.  We support targeted investment and intervention to enhance outcomes and improve long term opportunities and capacity which could be made available to people who are blind or have low vision, where NDIS supports were not available or appropriate. |
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### Education and Training

**Page 89 to 90** of the Interim Report considers the need for a stronger focus on foundation skills in both schools and vocational education and training, and on transitions from school to work. In shaping the future directions for education and training the Reference Group would like feedback on:

* What can be done to improve access to literacy, numeracy and job relevant training for young people at risk of unemployment?
* How can early intervention and prevention programmes more effectively improve skills for young people?
* How can a focus on ‘earn or learn’ for young Australians be enhanced?

| In addition to the obstacles to education and employment which young people face, we assert that access to information and resources in appropriate formats is a significant challenge to a person who is blind or has low vision in gaining literacy, numeracy, employability and technical skills. We ask that you include access to information for people with a disability as an identified obstacle to developing these foundation skills. We are aware of ongoing significant issues around access to information for people who are vision impaired.  Literacy and numeracy are key to lifetime employment opportunities. Students who are blind or have low vision still face significant challenges in mainstream classrooms in accessing learning information at the same time as their sighted peers as well as appropriately trained and skilled staff. For example, a teacher who is trained to support another disability cohort may be asked to work with a blind student simply because they work in the same school or geographic area. This leads to sub-optimal outcomes that significantly impact life and employment opportunities.  The use of braille is vital. With braille, a child can learn how words are structured and spelled, allowing them to read and write. Illiteracy places a person at severe disadvantage in both the short and long-term. According to the Perkins School for the Blind in the United States, 90 percent of Americans who are blind or vision impaired but braille literate, are in employment; demonstrating a strong correlation between braille literacy and employment outcomes. Failure to adequately resource mainstream schools to meet the requirements of braille users diminishes their life and employment opportunities.  Additionally, the development of computer skills allows students with vision impairment to keep up with their sighted peers and build the necessary skills to be able to undertake higher education and seek employment. In order to do this, consideration must be made to ensure software packages and platforms being used in the classroom meet accessibility guidelines. Inaccessible systems such as computer databases, websites and other software packages can discriminate against students who are blind or vision impaired, and they fall behind. Delays of weeks or months in the fast-paced environment of the school classroom have negative impacts.  We request the government to look at the link between education and employment, and ensure adequate, appropriate skilled teachers (with knowledge in blindness), equipment, curriculum and materials.  Vision Australia’s Employment report 2012 asked people who were blind or had low vision under the age of 25 about their participation in school work experience programmes: 78% were involved in some form of work experience (consistent with 80% in 2007); Half (52%) who participated in school work experience found their job with the help of their school, while one third (34%) found it by themselves; and 64% who participated in school work experience are currently employed in some capacity suggesting the positive effect of work experiences during school years on making young people who are blind or have low vision more easily employable. (p9, Vision Australia Employment Report 2012). Targeted programs within the school setting do provide employment opportunities for people with a disability.  We would support approaches that: Enhance jobseekers’ work capacity by maximising their independent living, mobility, assistive technology and employability skills; and Engage employers, promoting accessible recruitment practices, work environments and the benefits of employing people with blindness and low vision.  We encourage you to look at some of our programs including: Vision Australia programs targeting high school students e.g. Ready Set Go (Enfield), Employ-Able (Kooyong), XLR8 (Caringbah); and Vision Australia Kick Start program and linkages to external programs such as Willing and Able Mentoring and Step Into programs.  We note that eligibility requirements of the DES contract provide limitations for a number of cohorts. Specifically the current DES eligibility criteria excludes (among others) students studying full time (university and primary and secondary school). Vision Australia currently delivers work readiness and work experience training programs to clients not eligible for DES including students studying full time. These programs have made a significant improvement in employment outcomes for younger people. Given there is no funding under the DES program, we ask consideration be given to funding work readiness programs for students studying full time and extending it to other cohorts not eligible for DES programs, such as those working full-time seeking a career change (work readiness and career transition). This could be considered as part of an Innovation fund or pilot program. |
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### Improving individual and family functioning

**Page 90 to 93** of the Interim Report considers cost effective approaches that support employment outcomes by improving family functioning and the provision of services especially to people with mental health conditions to assist them to stabilise their lives and engage in education, work and social activities. In shaping the future directions for improving individual and family functioning, the Reference Group would like feedback on:

* How can services enhance family functioning to improve employment outcomes?
* How can services be improved to achieve employment and social participation for people with complex needs?

| Vision Australia supports efforts to enhance family functioning and service improvements, particularly for individuals and families affected by mental health, alcohol/drug dependence and family dysfunction.  Development of practical assistance measures could in part be achieved by talking directly to:   * affected individuals and families * personnel involved in service delivery * support groups and organisations who have a focus on these matters * other relevant sectors such as health, housing, community services to provide a targeted and holistic approach. |
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### Evaluating outcomes

**Page 93** of the Interim Report considers improved monitoring and evaluation of programmes aimed at increasing individual and family capability to focus on whether outcomes are being achieved for the most disadvantaged. In shaping the future directions for evaluating outcomes the Reference Group would like feedback on:

* How can government funding of programmes developing individual and family capabilities be more effectively evaluated to determine outcomes?

| Funding bodies and service delivers have traditionally measured inputs (i.e. funds, staffing) and outputs (i.e. hours of service, number of clients etc.) when evaluating programs, with the expectation that a desired ratio of inputs to outputs will achieve positive outcomes for people with disability. While cost-benefit approaches that focus on economic and human resources provide some indication of outcome, it is important that the efficacy of government funded programs be measured in line with the priorities set out in the National Disability Strategy.  The National Disability Strategy outlines the direction of disability policy in Australia from 2010 to 2020. The report emphasises that the key outcome of public policy across all levels of government should be the enablement of Australians with disability to live in accessible and well-designed communities with opportunities for full inclusion in social, economic, sporting and cultural life. The six priority areas for public policy outlined in the report are: Inclusive and accessible communities; Rights protection, justice and legislation; Economic security; Personal and community support; Learning and skills; Health and wellbeing.  Vision Australia believes it is important to collect a base of information from which to measure individual, program and systemic change in addressing disadvantage. This will require the development of appropriate Key Performance Indicators that are aligned to the six priority areas outlined above to monitor progress over time.  Given the transition towards person-centred care in the provision of disability services, it is also important that progress towards individual goals be taken into consideration when evaluating the outcome of government funded programs. |
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## Pillar Three: Engaging with employers

Employers play a key role in improving outcomes for people on income support by providing jobs. Reforms are needed to ensure that the social support system effectively engages with employers and has an employment focus. These reforms include making jobs available, improving pathways to employment and supporting employers.

### Employment focus – making jobs available

**Page 95 to 100** of the Interim Report considers what initiatives result in businesses employing more disadvantaged job seekers. In shaping the future directions for making jobs available the Reference Group would like feedback on:

* How can business-led covenants be developed to generate employment for people with disability and mental health conditions?
* How can successful demand-led employment initiatives be replicated, such as those of social enterprises?

| We note that 70% of the labour market is employed by small and medium size businesses and that this sector requires support to meet the challenge.  In relation to business led covenants that develop commitment between employers, government and the disadvantaged target group – to pledge jobs – Vision Australia has experience in working with private and public sector organisations to generate and maintain employment opportunities for people who are blind or have low vision and would be pleased to participate in and contribute to the development of this positive approach.  We have developed partnerships with generalist Disability Employment Service providers in conjunction with the delivery of high quality services at our 7 employment services sites and view these as a key to increasing employment outcomes and reducing the current high unemployment levels for people with blindness and low vision.  In relation to employer feedback about attitudes, we believe more work must be done. Our 2012 Employment Study revealed respondents found difficulties during the job application process, almost half (44%) indicated this was due to ‘employer attitude’ (30% in 2007). As this negative attitude appears to have increased since 2007, dedicated attention to this aspect is required.  Other responses to issues around attitude include employer education training programs such as:   * understanding blindness and low vision. * working with people with blindness and low vision. * seeing eye dog etiquette. |
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### Improving pathways to employment

**Page 101 to 107** of the Interim Report considers the different pathways to employment for disadvantaged job seekers such as vocational education and training and mental health support models. In shaping the future directions for improving pathways to employment the Reference Group would like feedback on:

* How can transition pathways for disadvantaged job seekers, including young people, be enhanced?
* How can vocational education and training into real jobs be better targeted?
* How can approaches like Individual Placement and Support that combine vocational rehabilitation and personal support for people with mental health conditions be adapted and expanded?

| Vision Australia has a number of joint clients with provider partners for whom we have already secured employment or achieved a 26 week Employment Outcome. We believe these successes can be built on to improve pathways to employment.  Some of the elements of these partnerships include:   * Relationship - regular meetings, streamlined referral processes and avenues for providing service information to Vision Australia’s clients seeking employment services. * Training - delivering staff training to provider partners on blindness and low vision, functional implications and typical interventions and technologies required to facilitate employment. The training also informs providers of the range of blindness and low vision services Vision Australia can offer including specialist worksite assessments and adaptive technology training as a National Panel provider. * Service - delivering specialist support services for clients of provider partners who are blind or have low vision. * Partners Support - ongoing advice and support to the provider partners in delivering services to their clients who are blind or have low vision, including case reviews. * Employer linkages - where Vision Australia cannot provide our employers with suitable candidates for their vacancies these are shared with provider partners and made available to their wider group of clients with disabilities.   The benefits of this arrangement for clients and Vision Australia are:   * Improved employment services and outcomes for people who are blind or have low vision.   It should be noted that the partnerships currently do not involve exchange of finances to fund staff in-service training or commission on employment outcomes received. These unfunded supports place significant pressure on our organisational and financial resources. Recognition of this essential specialist support through either direct funding to specialist providers or through a dedicated specialist funding account would support better employment outcomes for the cohort of people who are blind or have low vision.  Specialist services such as Vision Australia are often called upon to assist other Disability Employment Service providers to assist them in delivering services to clients with blindness and low vision. Whilst Vision Australia can charge providers on a fee for service basis, the reality is that providers are either not in a position to pay or are not prepared to pay and this potentially results in poor outcomes and this needs to be addressed to improve the pathway to employment for people who are blind or have low vision. Recognition of this specialist support in the development of future programs, contracts and procurement processes should be considered. |
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### Supporting employers

**Page 108 to 110** of the Interim Report considers what can be done to support employers employ more people that are on income support including better job matching, wage subsidies and less red tape. In shaping the future directions for supporting employers the Reference Group would like feedback on:

* How can an employment focus be embedded across all employment and support services?
* How can the job services system be improved to enhance job matching and effective assessment of income support recipients?
* How can the administrative burden on employers and job service providers be reduced?

| Vision Australia suggests the following activities to support employers:  Increase employer wage subsidies   * Wage subsidies make a real difference for jobseekers being able to get a ‘foot in the door’ and in easing employer concerns about the training phase. The cost of living and salaries have increased significantly however the current wage subsidy has remained at the same amount since it was introduced, and as recently as last year the higher level subsidy Wage Connect was put on hold. Wage subsidies should be a critical component for enabling a more successful approach by employers toward people with a disability.   Employer Reward Programs/Government Programs   * Recognition and rewards for employers who demonstrate high commitment to the employment of individuals with a disability. * Ensure that the Government leads by example in employing individuals with a disability including increased cadetships for people with a disability.   Employer Information   * Providing improved information to employers in relation to the benefits of employing people with disability (including statistics).   Funding to deliver pre-placement assessments with employers   * Future models should be structured to include improved support and more direct funding to encourage Disability Employment Service providers to work proactively with employers to increase their disability confidence and identify opportunities to employ individuals with a disability. * As an example, Vision Australia is currently working with employers to increase their ‘disability confidence’ and identify suitable job roles for individuals with blindness or low vision via job analysis worksite assessments. The job analysis also includes identifying the specialist equipment, adaptive technology and workplace modifications likely to be required for an individual with blindness or low vision. This approach has opened up job opportunities for our job seekers that may not have been identified had Vision Australia not been involved. It has also eliminated a critical barrier that many of our job seekers face when commencing a job - having the required adaptive technology or specialist equipment available on or before the job commencement date. Vision Australia is conducting these pre placement assessments free of charge to employers as we believe this approach will help increase employer awareness and open up increased employment opportunities for individuals with blindness and low vision. We recommend that future Disability Employment Service models are structured to better support/ fund such proactive activities with employers. Whilst one could argue that the National Disability Recruitment Coordinator could take on this role, in the case of job seekers with blindness and low vision, expertise in the field is required to conduct these specialist job analysis assessments.   Reduce red tape   * Ensure that “red tape” and paperwork is minimised for employers who employ people with disability. |
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## Pillar Four: Building community capacity

Vibrant communities create employment and social participation for individuals, families and groups. Investments by government, business and civil society play an important role in strengthening communities. Also, access to technology and community resilience helps communities build capacity. Building community capacity is an effective force for positive change, especially for disadvantaged communities.

### Role of civil society

**Page 112 to 116** of the Interim Report considers the role of civil society in building community capacity. In shaping the future directions for the role of civil society the Reference Group would like feedback on:

* How can the expertise and resources of corporates and philanthropic investors drive innovative solutions for disadvantaged communities?
* How can the Community Business Partnership be leveraged to increase the rate of philanthropic giving of individuals and corporates?
* How can disadvantaged job seekers be encouraged to participate in their community to improve their employment outcomes?

| Vision Australia is a significant not-for-profit organisation with an established reputation for innovation, advocacy, ability to deliver outcomes, and effective partnerships with business, government and the community.  We greatly support the Australian government commitment to foster and coordinate the philanthropic and corporate sector to lift the investment and make a difference in our lifetime for individuals and communities. This can be achieved through the Community Business Partnership – to identify priorities and barriers.  Each year we spend around $90 million delivering services to 33,000 Australians who are blind or have low vision, from 28 service sites across Australia, with just under 700 full time equivalent staff and support from 4,500 volunteers. The bulk of funding is derived through community and corporate fundraising, trusts and foundations. We know the importance of a strong and healthy sector and environment that promotes giving, and the importance of developing relationships as well as demonstrating providing clear and tangible benefits to benefactors.  Additionally, we strongly support continued efforts by the Australian government to reduce red tape to facilitate interaction and engagement between the disability sector and the corporate/philanthropic sector. |
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### Role of government

**Page 116 to 120** of the Interim Report considers the role of government in building community capacity. In shaping the future directions for the role of government the Reference Group would like feedback on:

* How can community capacity building initiatives be evaluated to ensure they achieve desired outcomes?
* How can the income management model be developed to build community capacity?

| Vision Australia notes the interim report does not include mention of disability in relation to the role of government building community capacity (as it relates to employment). We note there is a focus on community disadvantage, income management, access to health and transport, and working with local indigenous communities to develop enterprises and respond to changes.  We would support the development of initiatives to support specific groups such as people who are blind or have low vision – and there may be an opportunity to develop online activities and resources that are supported by the various levels of government. |
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### Role of local business

**Page 121 to 123** of the Interim Report considers the role of local business in building community capacity. In shaping the future directions for the role of local business the Reference Group would like feedback on:

* How can communities generate opportunities for micro business to drive employment outcomes?
* How can mutuals and co-operatives assist in improving the outcomes for disadvantaged communities?

| Micro business is a business with less than 5 employees as well as people who are self employed.  Mutuals and co-operatives have a long and proud history of supporting local communities and groups of people with common interests – with strong links and understanding of these communities and a commitment to providing services and solutions that are agreed.  We believe that the provision of appropriate information and support, targeted assistance, better understanding of what is appropriate and useful to accommodate someone with disability, easy to navigate and use systems and programs – would foster better outcomes for all stakeholders.    We believe that micro businesses, mutuals and co-operatives could be provided with:   * specific funds or incentives to purchase specialist services relating to training and employment for a person with a disability. Specialist services such as Vision Australia are often called upon to assist providers to assist them in delivering services to clients with blindness and low vision. Whilst worksite assessments are funded via the Employment Assistance Fund (EAF), many consultancy services Vision Australia delivers to other providers are not funded. Whilst Vision Australia can charge providers on a fee for service basis, the reality is that providers are either not in a position to pay or are not prepared to pay. Whilst committed to supporting other agencies to increase the employment of individuals with blindness and low vision, funding and support to do this would reduce pressures on organisational and financial resources. * access to a jobseeker account, similar to that available to Job Services Australia providers. * specialist workplace assessments and the involvement of a specialist in Adaptive Technology. |
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### Access to technology

**Page 124 to 125** of the Interim Report considers access to affordable technology and its role in building community capacity. In shaping the future directions for access to technology the Reference Group would like feedback on:

* How can disadvantaged job seekers’ access to information and communication technology be improved?

| Vision Australia believes that there must be dramatic improvement in the level of access to information, and use of assistive technology.  The Vision Australia Employment report 2012 found that:   * Two thirds (68%) of respondents believe that the job application process is accessible. This is an improvement since 2007 when only half of the respondents found the process easy to navigate. * The internet is the preferred way to search for employment for the majority (88%) of respondents compared to 65% in 2007. Increased reliance on the web suggests the ever growing importance of technology skills among people who are blind or have low vision. * Of the respondents who are employed, 94% use assistive/adaptive technology in their current roles. No data available for 2007.   Relevant information and technology includes:   * Specialist Worksite Assessments (includes lighting Assessments) * Adaptive Technology Training * Adaptive Technology Consultancy /Support * JAWS Scripting * Low Vision Assessments * Braille Training * Digital Access- Commercial consulting, testing and training services to enable customers to make their digital services accessible to all. * Converting print material into accessible formats   Vision Australia stands ready to assist the Government to lift the capacity of people who are blind or have low vision in the use of technology for accessing and maintaining employment opportunities. |
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### Community Resilience

**Page 125 to 126** of the Interim Report considers how community resilience can play a role in helping disadvantaged communities. In shaping the future directions for community resilience the Reference Group would like feedback on:

* What strategies help build community resilience, particularly in disadvantaged communities?
* How can innovative community models create incentives for self-sufficiency and employment?

| Nil comment. |
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