



**National Disability Services Submission:  
Response to the Department of Social  
Services' "Establishing a Disability  
Employment Centre of Excellence" Options  
Paper**

## **About National Disability Services**

National Disability Services (NDS) is Australia's peak body for non-government disability service organisations, representing more than 1000 non-government service providers. Collectively, NDS members operate several thousand services for Australians with all types of disability. NDS provides information and networking opportunities to its members and policy advice to State, Territory and Commonwealth governments. We have a diverse and vibrant membership, comprised of small, medium and larger service providers, supporting thousands of people with disability. Our members collectively provide a full range of disability services, from supported independent living and specialist disability accommodation, respite and therapy, to community access and employment. NDS is committed to improving the disability service system to ensure it better supports people with disability, their families and carers, and contributes to building a more inclusive community.

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## 1. Introduction

NDS appreciates the opportunity to provide feedback on the “Establishing a Disability Employment Centre of Excellence” Options Paper.

NDS agrees with the Options Paper’s description of reasons for the formation of a Disability Employment Centre of Excellence (the Centre). These include:

- A “one stop shop”
- Build evidence based practice
- Build the capacity of employment service providers
- Have a key quality control function
- Consolidate data
- Provide accessible information and resources
- Enhance collaborative competition

NDS continues to be concerned that a lack of comprehensive recent data on disability employment is impeding the development of evidence based policy by governments as well as impeding widespread quality practice in service provision. Addressing these two factors is essential to ensure the Centre can achieve its intended purpose.

It is also important to acknowledge that a Centre will be unable to rectify barriers to employment for people with disability that are the result of less than optimal

government policy settings. NDS will continue to advocate on behalf of its members for the removal and/or remediation of these policy settings.

Our responses to the Options Paper's various questions are below.

## **2. The reasons for establishing the Centre**

### **Why do we need a Centre?**

A Centre is needed to ensure that the entirety of the Disability Employment ecosystem in Australia is identified, not just models of employment services and supports, but the full range of stakeholders. The latter include people with disability, their families and carers, disability advocates, the wider community, government and the corporate sector and providers of an increasingly broad range of employment services and supports.

It is imperative that these disparate stakeholders have access to timely, quality and relevant information and resources on disability employment from Australia and overseas.

The key goals of the centre should be to ensure that the labour force participation and employment rate of people with disability is significantly increased by:

- Identifying and assisting in the removal of social, economic and systemic barriers to employment
- Broader access to sustainable, meaningful employment options that reflect their career aspirations and goals
- Ensuring easy access to the services and supports they require during their working life

### **What should be the core functions of the Centre?**

NDS agrees that the core functions of the centre should align with the reasons identified above. However, questions remain as to how the centre could have a "key quality control function" without impeding its role as a trusted, objective source of information and inspiration.

Given that there are existing quality control systems (for example, the NSDS audits for DES and the NDIS Practice Standards for NDIS providers), the Centre may have a more logical role providing resources and tools that enable employment providers to

enhance their service and support quality through a process of self assessment, which could then be measured against various benchmarks established from comprehensive sector wide data sources.

Otherwise, NDS members have identified some core functions of the Centre as below:

- Elevating the voice of service users (e.g. participants and employers) to the front of service and support design
- Celebrate, promote and endorse innovative service delivery in the disability employment sector
- A trusted repository of up to date disability employment data
- Developing high quality training materials for use by the sector
- Assisting in program design and acting as an independent review panel for government policy, with trialling and testing powers
- Link academia and the sector to develop robust innovative models for research and implementation
- Enable research, development and dissemination of results in a range of formats

### **3. Who could the Centre assist?**

#### **Who can the Centre assist? Are any groups missing?**

NDS agrees with the groups identified in the paper. NDS members have suggested that disability support services also be identified, even though they may not have a specific role as employment support providers. If they assist or directly support people of workforce age, they should be encouraged to be aware of and make use of the Centre as well as advising the people they support that it may be a useful source of information and assistance for them.

The freeing up of the provision of employment supports by NDIS providers and NDIS participants being able to seek employment supports from disability service providers that have not traditionally provided employment supports must be recognised in the Centre's charter.

NDS members have also recommended that education providers in both the secondary and tertiary sectors be supported to use the Centre as well as encouraging young people in education settings to access it. Education providers such as schools and

TAFE that offer employment preparation, training and work experience are a key element of the disability employment ecosystem and often work closely with disability employment providers.

### **How can the Centre work with stakeholders to increase the employment rate for people with disability?**

The Centre needs to encourage and facilitate seamless interaction between the various stakeholders, recognising that they may have disparate and sometimes conflicting functions, objectives and aspirations, not to mention knowledge of and ability to navigate the disability employment ecosystem.

This is especially relevant for people with disability and their families and carers as well as employers. The Disability Royal Commission cited many examples where people with disability (especially those who may not have had access to significant support networks) were simply overwhelmed when trying to navigate the disability service system, with regrettable results. The DRC has made several important recommendations specifying how important it is that information about service and support systems is readily available in accessible formats and easily obtained from multiple sources.

### **What can the Centre do to increase the capability and capacity of employment service providers?**

The Centre can increase the capability and capacity of employment service providers through the provision of a comprehensive library or catalogue of good practice models and case studies in employment support provision, social enterprise models as an emphasis on collaboration through network building and Communities of Practice. These are covered in more detail in the section identifying the Centre's priorities.

NDS members also provided feedback identifying that the Centre could be a valuable resource for the disability employment sector by exercising a role as overseer of training standards and industry minimum requirements.

This role could be extended to acting as an industry advocate promoting and coordinating a Continuing Professional Development (CPD) framework. The CPD could acknowledge and track employees' roles and work, additional skill development via an individualised professional development plan that recognises sector-wide levels of professional development and accredited skills. Current CPD models that could be

examined for application by the Centre include the Royal Australian College of General Practitioners (RACGP), and the Australian Institute of Company Directors (AICD).

## **4. What models exist?**

### **What are your views on the models presented?**

NDS regards all the models identified in the paper as having various positives, whether combined or individually.

There is a clear need for better research, evaluation, dissemination and implementation of relevant information and practices that would ultimately benefit all stakeholders and enhance the provision of disability employment support and the employment rate of people with disability.

The Centre could utilise a clearinghouse approach to the dissemination of information and the capacity to develop an evidence-based training hub.

A statutory agency approach would also have merit if it was seen to truly independent of government. NDS remains unconvinced that the Centre could be seen as both a repository of good practice and a regulator enforcing compliance. Any compliance and regulatory role undertaken by the Centre should replace, rather than duplicate or add to existing regulatory and compliance frameworks for service providers and employers.

### **Are there any models for a Centre to consider that are not included in this paper?**

NDS would cite the Technical Assistance Model and the Field-building Intermediary Model.

In the context of the development of the Centre, a technical assistance model could provide guidance and support to the Centre's stakeholders, such as employment services and employers, to improve their performance, skills, or knowledge. The technical assistance model can be implemented through various methods, such as training, coaching, mentoring, or consultation.

A field-building intermediary model is a framework that aims to influence systemic change by working with multiple stakeholders. It can engage and coordinate stakeholders to build partnerships and share best practice and so is worth considering in the development of the Centre.

## **What can the Government take from existing models of Centre of Excellence?**

### **What should be ruled out?**

NDS considers the Analysis and Policy Observatory (APO), which has a two decade long set of disability employment literature to be an extremely useful model for the Centre. The APO provides existing knowledge repository that the Centre could build on.

NDS members have expressed some concern that if the Centre does not adequately cater for the needs of all stakeholders it risks becoming redundant or may prevent the sharing of important information, harming its original intent.

The Centre must be based on inclusivity, transparency accessibility and trust. It must be open to all, regardless of their purpose. The following should be ruled out:

- A poorly defined or unduly complex mission for the Centre
- An unwieldy or potentially compromised governance structure
- An inability to clearly articulate aims, purpose measures and intended impacts
- Inability to connect with or influence decision makers at the government level
- Perceived undue prioritisation of a stakeholder or stakeholders

## **5. What are the next steps towards implementation?**

### **Where could a Centre be best placed?**

NDS members recommended that the Centre be established as a stand-alone entity, to provide sufficient independence and prevent attempts by stakeholders to exert undue influence that would compromise its role. Consequently, NDS recommends that the Centre should not be placed within a government agency, as this would be seen to compromise its independence.

The Centre should have a highly visible online presence and be prominently linked from the Jobaccess, DSS, Workforce Australia and services Australia websites. It should also have a prominent social media presence and a distinctive easily identifiable landmark.

### **Are there any other implementation issues that should be considered?**

NDS members identified several key issues to be managed during the implementation of the Centre:



- It must be sufficiently resourced to achieve its aims. The example of the Analysis and Policy Observatory (APO) is instructive. Long term funding and ongoing support will be critical.
- Accessibility – the Centre must be completely accessible by all stakeholders and not regarded as the preserve of service providers or academics, for example. It must be seen as producing and developing accessible and clearly beneficial material for all stakeholders.

### **What elements of the proposed role of the Centre or its functions should be prioritised?**

NDS would advocate that the recommendations of the Disability Royal Commission (DRC) regarding the provision of information about the disability services ecosystem should be examined and implemented through the Centre as a priority. For example, the DRC made recommendations in its [Volume 7: Inclusive education, employment and housing](#), relating to access to information on the DSP. NDS has previously stated that information on wages, DSP and other welfare benefits has been unclear or difficult to access. This has created disincentives to employment, higher wages and increased work hours for people with disability. Prioritisation of the DRC recommendations in Volume 7, where relevant and practical, is essential and can be logically addressed through the Centre.

Other elements of the role of the Centre that should be prioritised are identified below.

Developing a catalogue of evidence based good practice models and case studies that will assist in the transformation of the Supported Employment Sector, including the placement of employees and jobseekers with disability in mainstream settings.

Consolidation of relevant data and development of a comprehensive plan to expand the collection and publication of data on the employment of people with disability, including their employment settings, their eligibility for NDIS and/or DES, their wage rates (and the numbers receiving pro rata wages) and their hours worked. This dataset should build on the existing DES dataset, but also include information collected from NDIS participants, many of whom may be in work, but ineligible for DES. Since the Disability Services Census ceased being collected, such comprehensive data has been entirely absent and prevents any kind of benchmarking of data to enable the tracking of progress in the various employment related indicators above.

Establishing networks and resources that will encourage and enable collaborative competition. NDS has heavily emphasised this concept when working with our members who provide employment services. The Communities of Practice model has demonstrated great potential for NDS members, highlighting for example, good practice in employment support, innovative business models and enhancing knowledge of significant Industrial Relations reforms.

## **6. Contact**

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