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Disability Employment Services Consultations
Department of Social Services
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To whom it may concern

Re: Submission on the new specialist disability employment program and related consultation

Anglicare Australia welcomes the opportunity to provide feedback on the new disability employment program and related consultation.

The Anglicare Australia Network provides support to people with disability across the country through a range of services, including Disability Employment Services (DES). Our Network has experienced first-hand the positive impact meaningful employment and participation can have on the lives and financial security of people with disability. However, DES reviews have consistently revealed the structural issues that restrict the program from providing the support people with disability need. The introduction of a new specialist disability employment program provides us with an opportunity correct these issues and create long-lasting, positive change to the lives of people with disability.

Disability employment services exist to improve the employment outcomes of people with disability by providing them with a pathway into the workforce. Yet, one of the of the underlying flaws with the program is that for much of its existence it has prioritised reducing welfare dependency for people with disability over empowering them to find and sustain employment that provides them with financial security, greater independence, and individual fulfillment. As a result, people with disability are often pushed into any job with little regard for how sustainable, appropriate, or beneficial the employment opportunity is for them or the employer. The failure to provide person-centre services was seen by the Disability Royal Commission to have consequences that are "far-reaching and can discourage people from engaging with the DES system and seeking open employment in the future"[i].

Anglicare Australia welcomes early indications that a new specialist disability employment program will change this and focus instead on making genuine improvements to the lives of people with disability.

Diversification of the market

The Information Paper – Market Structure (the Information Paper) proposes a market structure for the new disability employment program which is divided into two separate and parallel streams: a generalist lane and a cohort specialist lane. Anglicare Australia sees merit in this structure as avenue to provide people with disability with greater choice and control, and tailored support when seeking employment. However, we recommend consideration be given to how the proposed structure and broader reforms align with the principles that underpin Australia's national disability policy framework.

Australia's Disability Strategy 2021-23 provides clear guidance on how supports and services can be best designed to improve outcomes and achieve greater inclusion of people with disability. Whilst distinguishing between cohorts to identify areas of specialisation for employment services providers can enable supports to be tailored to the individual, there is risk that cohort categorisation will reinforce generalisations about disability or view support needs through a deficit lens. To avoid this the reasoning and intent for establishing a cohort specialist stream should be consistent with the eight Guiding Principles within the Strategy.

Further, Government should clearly communicate this to ensure people with disability, service providers and the broader community understand what the Government is trying to achieve through cohort specialisation and what benefit specialist categorisation to individuals and employers in comparison to the generalist stream.

One of the foreseeable issues for this model is the potential negative impact of forcing providers to choose between either stream. This binary decision of providing general or specialist services does not recognise that for many providers there will be overlap in the services they provide, and that they could easily slot into either category especially where they service individuals with intersectional barriers to gaining employment. Without further clarity about how the split streams will operate, providers and their clients will face increasing uncertainty about their future. It would appear that the new system has been designed without this consideration in mind.

Disability Employment Australia notes that in the worst-case scenario, some providers who may have specialist expertise opt to be a generalist provider for the sake of contracting and tendering ease, despite potentially having a proven track record with specific cohorts or support needs. This loss of expertise and relationship will have adverse effects on participants already accessing disability employment services.

While the proposed two-stream approach may appear sensible on the surface, it is important that does not operate to lock out providers who could fit into either category, nor should it lead to people currently accessing or relying on disability employment services to end up receiving a different support from what they current are.

Ensuring Services Australia capacity

A new disability employment services program cannot be successful in improving employment outcomes for people with disability with adequate administrative and operational supports. Presumably the program will be delivered through Services Australia, as is the case for the existing disability employment services system.

Anglicare Australia is aware some providers in the sector believe Services Australia lacks the necessary resourcing to administer and deliver the current program, and that delays and backlogs are common. This raises the concern in transitioning to a new, more complex model which will require sustained, additional investment to deliver and maintain.

Anglicare Australia hopes that proposed changes to assessment requirements will reduce some of the administrative burden on Services Australia, but this alone will not be enough. The creation of two referral pathways for people with disability, into either of the general or specialist streams, will be complex and critical for Services Australia staff to get right. Frontline Services Australia staff should have access to specialised resources and training to help them understand the changes and equip them to support people with disability to navigate the system.

Fostering trust in the system

Central to the success of a new disability employment system is not just a program that provides greater choice and independence to people with disability, but one that improves societal attitudes about disability and teaches employers to value the contribution people with disability make to the workforce. However, achieving this is not possible without allowing people with disability to build trust in the system.

It is well known that people living with disability routinely experience exclusion or discrimination because of negative attitudes and misconceptions about disability. The Australian Human Rights Commission reviews more complaints about disability discrimination than any other form of discrimination, with 46 percent of complaints in 2022-23 about disability discrimination[ii]. Because of the prevalence of these experiences, Government must be alive to the risk that systemic reform introduces new challenges which may lead people with disability being less certain about the path forward and cause greater harm. Access to new and increased choice and control must be accompanied by supports and safeguards.

The disability employment system is changing. This will mean new access pathways, changes to providers, and new complexities for people with disability and their carers to manage and navigate. With the new model set to launch on 1 July 2025, it is important that the Government communicates what this means to people accessing the current system.

For too long, employment services have been viewed through the lens of reducing rates of people on welfare, rather than helping people live meaningful and fulfilling lives. It seems clear that the Government is reassessing this approach and intends to refocus this program to maximise benefit, by ensuring it operates a disability support program not a social security one. As we continue to work on transitioning to a new system, Anglicare Australia urges the Government to work collaboratively with people with disability and the disability employment sector to manage risk and foster a culture of trust.

We would welcome the opportunity to expand on our comments. Please do not hesitate to be in touch if you would like to discuss the issues raised in greater detail.

Yours sincerely

Kasy Chambers
Executive Director

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[i] Final Report, Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (2023)

[ii] People with disability in Australia, Australian Institute of Health and Welfare (2024)