Blind Citizens Australia
Inquiry into improving the employment participation of people with disability in Australia

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This submission is available in large print, audio, Braille and in electronic formats for access by people who are blind or vision impaired.
About Blind Citizens Australia: Who we are and why we say what we say

Blind Citizens Australia is a unique charitable organisation that is solely made up of and represents people who are blind or vision impaired. All of our Board of Directors and our committees are required by our Constitution to be people who are blind or vision impaired. Many of our staff are also vision impaired. We have over 3000 members around Australia who are all people who experience blindness. This is why we are best placed to comment on the necessary changes that are needed to improve employment opportunities and career pathways for people who are blind or vision impaired.

Blind Citizens Australia is funded by the Federal Government as the national secretariat to represent the consumer viewpoint of people who are blind or vision impaired and is not a service provider. In addition to our role as the national peak consumer body, Blind Citizens Australia provides information, support and assistance to people who are blind or vision impaired to successfully advocate for their needs.

We are driven by our mission to achieve equity and equality by our empowerment, by promoting positive community attitudes and by striving for high quality and accessible services which meet our needs.

Background

Blind Citizens Australia welcomes the opportunity to provide comment to this Inquiry. Our expertise lies in sharing the issues and barriers currently experienced by members who are blind or vision impaired and advocating for reform which will best meet their complex interests.

In December 2012, Blind Citizens Australia launched the Blind Citizens Australia Employment Policy suite, a series of five policies and six factsheets targeted to recruiters, employers, disability employment service (DES) providers, all levels of government and to the Federal Government. The fifth policy in the suite focuses on how Australia can meet its national and international obligations as they relate to increasing employment opportunities for people with disability, particularly people who are blind or vision impaired. Our factsheets focus on challenging assumptions and breaking down common myths about what people who are blind or vision impaired can do, provide guidance on legal blindness and how people who are blind access information and provide useful links for recruiters, employers and DES to access more detailed information.

The development of the Blind Citizens Australia employment policy suite was extensively informed from the experiences of our membership, with a sub working group formed of people who are blind or vision impaired as people currently in the workforce, people who have been long term unemployed, job seekers and recent retirees.

In the development of these documents, Blind Citizens Australia also consulted extensively with external stakeholders including the Australian Human Rights Commission, Disability Employment Australia, blindness specific DES providers Royal
Society for the Blind and Vision Australia, the Australian Blindness Forum, Australian Human Resource Institute, Jobs Australia and the Australian Public Service Commission.

The full employment policy suite has been included with this submission in the attached Appendices. We strongly encourage the Department to read the full suite as the suite provides significant guidance on the areas of reform that are warranted to significantly address the unemployment and under-employment of people who are blind or vision impaired.

What are the main barriers faced by people with disability in employment?

People who are blind or vision impaired experience one of the highest rates of unemployment even amongst people with disability. Recent research undertaken by Vision Australia, a blindness service provider, indicated that 58% of respondents to the research were unemployed “not by their own choice”, as compared to 14% of the wider Australian population at the time the research was undertaken. People who are blind or vision impaired who are seeking a job are therefore four times more likely to be unemployed compared to the general population. Underemployment also continues to be a significant issue for people who are blind or vision impaired, with one third of participants in the same research study wanting to work more hours.

Looking more broadly at community attitudes, research has indicated that acquiring blindness is feared to the same extent as developing cancer – a fear that can place people who are blind or vision impaired in a position of pity as well as compromise perceptions of what a person who is blind can do successfully and independently. This has a flow on effect to the perception of the capacity of people who are blind or vision impaired in the world of work. Significant reform, over and above what is proposed to improve the employment of people with disability, is needed for groups of people that face chronic, high and long term unemployment.

There are a number of barriers which our members have shared which have contributed to their inability to find long term, well paid and meaningful employment. These are as follows:

Pre-conceived ideas about what people who are blind or vision impaired can and can’t do

Pre-conceived ideas about the capacity of people who are blind or vision impaired is a major stumbling block for many of our members. Perceptions about increased occupational health and safety risks, how other staff members will “cope” and

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2 Refer to 1.
communicate with a person who is blind and a lack of knowledge of the practicalities of how a person who is blind or vision impaired will conduct the role remain significant hurdles to gain employment.

“I was told that unfortunately I wouldn’t be offered the job with the call centre. The lady told me that as the hours worked would be after hours, it would be difficult for me as a person with low vision. Also I had to negotiate stairs and she expressed that I wouldn’t be able to do that because of my low vision and that I could fall. Despite telling her that I could use stairs (and that people who are blind or vision impaired can use stairs safely) and that I would wait for my taxi under the building light - which other people would do too – I was told sorry, but no.”

**Effort and perceived cost of hiring a person with disability**
The perceived cost of hiring a person who is blind or vision impaired – particularly the cost of adaptive equipment – can act as a barrier even where an individual is able to communicate how they conduct work related tasks.

“One of the main barriers to employment is the general ignorance around blindness and low vision in how we function as people and how we function as employees. A lot of employers seem to think that employing us will require too much change and be too big an imposition on other employees without even talking to us about how we would carry out the role. For some jobs I’ve interviewed for someone with less experience than me has gotten the job over me as they didn’t have a disability so the employer didn’t need to rethink their workplace practices like using taxis & carpooling rather than using the work car. Some organisations are looking for someone that they can mould into their own image rather than someone who has already developed a sense of who they are & their working style”.

**Accessibility of the worksite and processes**
Accessibility is more than a ramp. Accessibility barriers for people who are blind or vision impaired include

- databases and programs which are inaccessible with screen reading software
- inaccessible procurement such as phone systems, photocopiers and systems that are used in an office environment
- inaccessible procedures and information
- poor access considerations such as signage, lighting or glare and
- Inflexibility to modify some components of a role, particularly where a role has some visual based tasks. Minor modifications to a process and/or trading of tasks between team members are simple adjustments which can increase efficiency, accessibility and in some instances, streamline processes.

Refer to the **Hello Employers** policy document for more information.

**Inaccessible recruitment processes**
Jobs advertised on websites which do not comply with W3C accessibility, online application systems which are inaccessible or hard to navigate using screen enlargement or screen reading software (which reads information presented on a
computer screen audibly) and documents which are only available in PDF formats are all information barriers which can limit, or prohibit, access by job seekers who are blind or vision impaired. Some interview processes can also be inaccessible to applicants who are blind or vision impaired, such as in-house assessments which are not compatible with adaptive technology.

Once again, our Hello Recruiters policy document provides guidance to recruiters about how to make the recruitment process accessible to people who varying levels of vision impairment.

**Positions descriptions which indirectly discriminate**

A requirement which is increasingly appearing in position descriptions is the requirement for a driver’s licence – even for roles where extensive travel would not be ordinarily required to conduct the role. This requirement, simply through its inclusion in a position description as a mandatory or ‘essential’ criterion, automatically eliminates people who are legally blind (a person with 10% or less vision or a visual acuity of 10 degrees) and all people with a significant vision impairment who are unable to drive. This also excludes many people with disability who are unable to drive and people who choose not to have a driver’s licence who have the competitive skills to conduct the role advertised.

**The knowledge of DES staff to promote the capacity of people who are blind or vision impaired**

Our members note that 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. If a DES does not understand how a person who is blind or vision impaired can complete work related tasks, they will not be the best advocate nor support resource to assist a person who is blind or vision impaired into a meaningful role which meets a person’s full access needs.

Blind Citizens Australia has created a policy directed to DES providers titled Hello Disability Employment Service (DES) providers to improve knowledge by DES of how to work and support a person who is blind or vision impaired and provides extensive recommendations.

**People losing their sight while employed**

Age related vision loss is now one of the leading causes of vision impairment. Many people who are blind or vision impaired who have lost their sight later in life have noted that the decision to leave the workforce prematurely was made:

- Out of concern that an employer would not, or could not meet their needs;
- Because the person was unaware that adjustments could be made to their role and were unaware of where to turn to for support;
- Due to a fear to disclose;
Based on self determination that they would not be able to do the role that they used to do.

Many of our older members have noted that they would have stayed in employment had they not lost a significant level of sight. These experiences are consistent with research conducted with people who have acquired a significant hearing impairment later in life⁴.

As noted in our employment policy suite:

'It makes more sense to modify a role to retain a good worker than to replace them with someone who may not have the same skills, knowledge and experience and who will need to be trained from scratch. Losing your sight is one of the most difficult transitions and challenges a person can experience. A common experience among our members is difficulty holding on to employment during this very distressing time. Losing a job at the same time as losing your sight can trap people into poverty and social and financial exclusion that statistics and experience show is very hard to escape again. And this also leaves a gap for your business.'

Access to work experience

A job seeker with well rounded skills and previous work experience has become the benchmark for many positions, including entry level positions. While students without disability may gain preliminary work experience through retail or hospitality experience during their teenage and post high school years, many students who are blind or vision impaired do not gain this experience. Once again attitudinal barriers by employers can come into play.

In addition, career advisors in high school and post secondary institutions can arbitrarily restrict work experience opportunities for students based on their perception of the careers people who are blind or vision impaired can do. Blind Citizens Australia is aware of a number of students who are blind who have been discouraged from pursuing careers in certain fields because "blind people can’t do that job" or have been encouraged to choose specific careers "because this is what other people who are blind do". Work placements are often negotiated with the assistance of a career advisor, therefore it is vital that perceptions of blindness are not used to impose limitations on students who are blind or vision impaired in considering what might be suitable work placement options.

Likewise, work experience is also critical for people who are blind or vision impaired who have been out of the workforce for some time. As noted by two of our members:

“Getting paid work experience is pretty hard & volunteer work experience doesn't have the same value in the application process regardless of how hard you work in a volunteer role”.

⁴ Labour force activities, barriers and enablers for people with a hearing impaired: the workforce barriers and incentives study", Professor Luke B Connelly, Report No.13, Australian Centre for Economic Research on Health (September 2012)
“I was recently interviewed by (disability service provider) for a position, and although the feedback I received from them was very positive, I didn’t get the job simply because the person who did get it had worked in areas I had never had the opportunity of working in. I think the limited opportunities we have to gain on-the-job experience that would allow us to either get a job in the first place, or to be able to progress up the career ladder is placing us at greater and greater disadvantage. Employers are pretty much ruthless these days in choosing candidates with the most experience and the candidate who will fit their agendas most closely. People don’t just walk into jobs anymore and get given a go. Those days seem to be gone, and for us, I think they need to return”.

How Australia can meet its national and international obligations

In order to meet our national and international obligations, Australia needs to invest in a new approach to address this long standing inequity. Blind Citizens Australia refers the Inquiry to our policy document ‘How the Australian government can meet its national and international obligations’ which outlines a number of significant areas for reform.

In summary these include:

- Supporting people with disability to explore flexible employment options, including financial incentives (such as the National Enterprise Incentive Scheme) and support to start their own businesses. The implementation of the National Disability Insurance Scheme could be a good opportunity for some individuals with disability to form viable business practices where transferable skills can be shared.
- Providing practical support to small and medium sized businesses to ensure that strategies are tailored to the needs of specific workplaces and to enable career advancement
- Increasing employer wage subsidies to help people who are blind or vision impaired to get a foot in the door
- More targeted promotion of DES and how DES can support a business to employ a person with disability
- Ensuring that legislation backs up the talk about improving employment opportunities for people with disability, including the development of Disability Standards for Employment
- Addressing the eligibility criteria of the Employment Assistance Fund (EAF) to ensure that people who are blind or vision impaired can access the aids and equipment they need as a job seeker or volunteer to enable greater job readiness. If a person who is blind or vision impaired does not have the equipment they needs and the learned skills to use the equipment and to demonstrate their aptitude, it can make it much more difficult to compete for roles.
- Continued reform of DES requirements to ensure that DES are working to maximise outcomes for jobseekers rather than working to generate profit. Individuals should be placed in a job that best meets their skill set and interests, rather than the first job that is available.
Refer to Appendix A for our policy document ‘How the Australian Government can meet its national and international obligations’.

Blind Citizens Australia also supports a number of the recommendations proposed in the Australian Federation of Disability Organisations (AFDO) submission including:

- Investigating the implementation of a minimum target or quota for employers with over 100 staff
- The development of an employment council of people with disability, similar to the model utilised to increase the employment of people of indigenous heritage
- Events aimed at eliciting CEO buy in which are run by Government and the Australian Chamber of Commerce and Industry (ACCI)
- The delivery of training packages by people with disability
- The investigation of a levy for organisations over 100 employees who do not meet the minimum target set, with funds raised used to cover the costs of workplace modifications for companies which employ their full quota of employees with disability
- Better targeted workplace subsidies for employers with less than 100 staff
- Work cover premiums to be struck at a lower rate for people with disability
- Government procurement to favour businesses that have achieved their disability employment targets.

What are the practical and workable approaches to make a real improvement to employment outcomes and workplace equality for people with disability? How would they work?

Australia is one part of a global economy – a country which must compete against other markets where labour is offered at a much lower rate of pay. This does not mean that we should devalue our workforce but it does mean that our workforce needs to be competitive and provide high quality outcomes in order for Australia to remain a viable, flourishing country.

The employment of people with disability needs to be demonstrated to employers as a venture which is profitable – both in terms of time invested and money – not just as “the right thing to do” or to give a person with disability a “fair go”. This requires a significant shift in how the employment of people with disability is marketed to businesses across Australia and is contingent on a number of elements in addition to the reforms outlined in our employment policy suite. These include:

1. A solid marketing campaign which outlines the facts

If employers do not understand how people who are blind or vision impaired “see” a computer screen or are uncertain about their workcover obligations as they relate to a person with an existing disability, they may take the easy way out.
The facts as outlined in the discussion paper – greater longevity in a role, lower safety and insurance costs and better ratings on attendance, sick leave and recruitment – and the supports, such as the Employment Assistance Fund, that are available to support employment of people with disability are still largely unknown by small and medium sized businesses. A targeted and sustained marketing campaign is necessary to dispel the perception of what people with disability can do and to showcase people with disability who are currently working in a range of professions.

The Other Film Festival’s marketing campaign is a fantastic example which showcases the person first and places emphasis on their attributes as everyday people. The person’s disability is then shown as a second, almost after thought. This is effective in teaching the community to put the person before the label.

We need to be seeing positive images of people who are blind or vision impaired and people with disability working in a variety of roles including as a storeman to an office professional to a farm hand to a financial advisor. We need to breakdown the perception of people with disability as one homogenous group with limited skills and to showcase that the vast majority of people with disability are highly competent individuals who can step into a role. This messaging needs to be targeted to the wider public (ie. television and social media) and provocative so that it is spoken about in the lunch rooms of companies and is at the front of mind of recruitment staff and company directors.

Most importantly, the cost benefit to a business needs to be showcased as part of a marketing campaign. Removing or lessening the costs of recruiting and retraining new staff, paying lower workcover premiums long term and retaining corporate or job specific knowledge is an investment, particularly when considering that an individual with disability may only require some minor adjustments to complete the role.

2. Showcasing the best of the best and how they are doing it

Showcasing the best of the best – some of top 200 companies who are hiring a proportionate percentage of people with disability – can show other companies that it is possible and it is profitable, both financially and in the value add to the company through the addition of a person’s rich life skills. Business leaders who have seen the commercial benefit for their business could be some of the strongest allies to the employment of people with disability. This could include talking about the benefits that this has had for their company but also talking about how their company made the transition and how it can be sustained.

Importantly, organisations that are showcased need to be able to show the different roles that people with disability hold within the organisation. Showcase organisations are organisations where there are people with disability in senior leadership positions, people with disability in mid level roles and people with disability in entry level positions. Showcase organisations are also organisations which have employees with a range of disabilities, not just disabilities that can most easily be accommodated. People who are blind or vision impaired can be software developers, lawyers, office professionals, administration assistants and more. This should be reflected in the diversity of the workforce.
3. Federal, State and Territory governments to lead by example

Blind Citizens Australia refers the Inquiry to our policy document titled Government as an Employer: What can all sectors of the government do to improve the employment of people who are blind or vision impaired?. This document outlines a number of strategies which can set government as a benchmark employer. Leading by example requires the following:

- Improving workplace accessibility which extends beyond simply improving the physical environment. This includes accessible procurement. Blind Citizens Australia refers the Inquiry to the recent report released by the Australian Communications Consumer Action Network titled “Government ICT purchasing: What differences do accessibility criteria make for people with disabilities” which was also informed by the experiences of people who are blind or vision impaired.

As an example, a major government department continues to utilise a database that is known (including through the lodgement of a Disability Discrimination complaint) to be incompatible and inaccessible to employees and external staff who are blind or vision impaired using screen reading software. Most importantly, the inaccessibility of this database was identified during the testing phase prior to introduction (when script modifications could have been made) but was implemented regardless with no modifications.

Inaccessible systems which compromise access for people who are blind or vision impaired are also evident in other parts of government including local council, where one of our members notes:

“I have been working at local council for five years and some of the programs I need are completely inaccessible with screen reading software. I have raised this repeatedly to my manager and have progressed this within Council. I have spoke about it, written about it and emailed about it. I am continually told that IT are looking into it but it only seems to progress after I chase it up. If I don’t chase it up, nothing happens. It is no more accessible now than it was five years ago. We have a disability advisory committee and we work on improving disability access in the community but I am treated like my needs are irrelevant’.

Blind Citizens Australia recommends (as per point 8 of our policy (Government to meets its national and international obligations), that the compatibility of new computer systems with software and technology used by employees with disability should be resolved by the development of whole of government requirements which embed accessibility. These requirements could be modelled on Section 508 of the US Rehabilitation Act. This section requires that electronic and information technology used by US Federal agencies is accessible to people with disability.

- Improving recruitment and retention, including at senior levels
• Targeting underperforming departments with low levels of employment of people with disability
• Ensuring that work experience programs are open and flexible to people of different ages and experience
• Developing tailored career advancement programs and implementing processes to enable current employees with disability to make their way up the career ladder. We are aware of many instances where people who are blind or vision impaired have been bypassed for career advancement because of the “trouble” it would take to relocate an employee to another work section or to apply for new modifications, if required.
• Requiring contracts with external recruitment agencies to clearly include the active recruitment of people with disability
• Investigating short internships for high school and post high school students to provide practical work experience which can lend itself to future employment opportunities
• Ensuring that interview panels include a person with disability, where possible, similar to the requirement to have balanced gender representation on recruitment panels. This not only serves as best practice to ensure that a panel has a range of experience, but also helps to build the capacity of recruitment staff to see beyond a person’s disability and to have a better understanding of the job skills that people who are blind or vision impaired have. As one member put it:

"I am certain that many very qualified people who are blind or vision impaired lose out during the interview process not because of anything they lack, but because of a limited understanding of interview panel members as to how people who are blind or vision impaired use access solutions to undertake a particular job".

4. Building the capacity of people with disability as viable employees

Increasing employment opportunities and positions to people with disability should in turn lead to an increased demand for highly skilled qualified individuals. It is therefore important that reforms in this space are not viewed purely as a one sided approach. While there are many skilled people with disability who are ready to jump – or rejump – into the workforce, there are also many people with disability who need to learn the social mores of a workplace and the skills needed to make a productive contribution.

As noted by AFDO in their submission, “not all people with disability aspire or are capable of senior executive roles nor do we all want to work in entry level jobs”. Building capacity of people with disability, particularly for people who have been long term unemployed is part of the equation of increasing the employability of people with disability. For people who are blind or vision impaired, this can include mentoring of jobseekers who are blind or vision impaired by people who are blind or vision impaired who have reached, or are successfully realising, their employment goals. Capacity building can help people who are blind or vision impaired to develop the necessary skills to move up through the ranks and in turn, be in a position to influence recruitment decisions and create opportunities to hire people with disability and people who are blind or vision impaired.
Capacity building also requires access to peer support networks and programs which links successful people with disability with jobseekers with similar disabilities to learn transferable employable skills and the best way to approach disability specific challenges which can arise in a work setting.

Disability disclosure and disability employment reporting

Blind Citizens Australia is supportive of the proposal to establish baseline data for disability employment as well as transparent methods of collection across the board. Blind Citizens Australia also supports reporting by companies on the level of disability employment within their company. Blind Citizens Australia recommends that the development of any benchmark also include a requirement to provide disability specific data, particularly on the numbers of people who are blind and people who have disclosed a vision impairment.

While increased reporting would provide a benchmark to measure improvement in the employment of people with disability, it is imperative that the option to disclose the presence of a disability remains at the sole discretion of the individual. This is particularly crucial for people who may not outwardly appear to have a disability, such as people with some vision impairments or people with a psychosocial disability who may not want to disclose.

The privacy issues surrounding disclosure should be resolved by giving primacy to an individual’s right to dignity and privacy under the UN Convention on the Rights of Persons with Disabilities and the view that the disclosure of disability is only relevant to matters which relate to the inherent requirements of the job at hand. It is therefore important that the concept of inherent requirements should be interpreted expansively so as not to exclude people with disabilities.

Closing Comments

Blind Citizens Australia welcomes the commitment of the Australian government to explore how the employment of people with disability can be improved and to develop meaningful opportunities for the employment for people who are blind or vision impaired across the public and private sector.

Blind Citizens Australia believes that a multifaceted approach is needed to address the current barriers to employment experienced by people who are blind or vision impaired which targets recruiters, employers, disability employment service providers and government as a whole. This include a tailored marketing campaign to increase awareness of the capacity of people with disability; showcasing businesses that have achieved successful outcomes through the move to a more diverse workforce; targeted approaches for government, including specific measures to address accessibility barriers and capacity building of job seekers to create a competitive workforce.

Appendices: Blind Citizens Australia Employment Policy Suite