

The Department of Education, Skills and Employment

**Exposure Draft for the New Employment Services Model 2022
Purchasing Arrangements**

Response submitted by:

The Royal Society for the Blind

Dear Employment Services Purchasing,

The Royal Society for the Blind of SA Inc (RSB) would like to provide the following feedback on the New Employment Services Model Exposure Draft.

Our feedback relates specifically to **item 1.3.2: Specialist Enhanced Services**.

According to the exposure draft, People with Disability (PWD) will not be included in the specialist cohorts that will be available on commencement of the program in July 2022.

We ask that the Department reconsiders this decision, and provide the following comments in support of this request to allow specialist Providers for PWDs to operate on commencement.

Our comments relate primarily to the issues related to effective servicing of people with sensory disabilities, such as those who are blind or vision impaired, and those who are deaf or hard of hearing. However, many of the issues relate to other specialist cohorts as well.

1. Meeting the needs of People with Disability

- Blind and Vision impaired clients:
 - Usually require adaptive technology such as screen reader software (JAWS) or screen magnifier software (ZoomText) to be able to operate the computers that their Providers are required to have available for their job seekers
 - Normally require desktop magnifiers (aka CCTV's) to magnify documents including application forms and other printed material (such as job plans or other agreements) to be able to read them if they have low vision
 - May need staff trained in providing sighted guide services when escorting them to their appointments if they have severe vision loss or are blind.
- Deaf and Hard of Hearing clients:
 - Deaf clients are entitled to be supported by a NAATI accredited AUSLAN interpreter when negotiating important agreements, such as Job Plans.
 - AUSLAN users can communicate in writing, but their syntax and grammar is non-standard. They often need support to reword documents into regular English, including job application letters.
- All clients with disability will receive better support and assistance if the staff member working with them is trained and knowledgeable about the impacts of their specific disability, for example, those with Autism Spectrum Disorder.

2. Access to specialist services by People with Disability

- With the change to DES eligibility from 1 July 2021, many formerly eligible DES clients will no longer be able to access the specialist supports they require due to either having a 30 hour benchmark, or not being in receipt of a payment (or meeting the exception rules).
 - Some people do not wish to apply for a Disability Support Pension or other payment as they prefer to be independent.
 - Recently we have encountered a higher than usual proportion of Employment Services Assessments returned with a 30 hour benchmark when normally we would have expected a lower benchmark based on the recorded circumstances in the report.

3. Issues for generalist Providers supporting People with Disability

- Generalist Providers are unlikely to already have access to the adaptive technology required to provide effective and required services to blind and vision impaired clients. Is it expected that they will need to purchase these for each of their sites in case they may need to service someone that does need it?
- AUSLAN supports under JobAccess Employment Assistance Funding can only be used for job interviews and work related interpreting (eg, on-the-job interpreting). It can not be used for regular Provider interviews. Many Deaf and Hard of Hearing clients are unable to meet eligibility for NDIS funding, so may not have NDIS funding for interpreting. Would generalist providers be expected to pay for AUSLAN interpreters from their own funds where these alternatives are not available?

4. Specialist Providers capacity to deliver services to People with Disability under NESM

- Specialists that currently deliver services to PWD cohorts through similar programs (including DES) can already provide:
 - Existing sites and infrastructure located in areas accessible to their specialist cohort
 - Appropriately configured adaptive technology to allow independent job search and review of documents such as Job Plans by their participants
 - NAATI accredited AUSLAN interpreters (if working with Deaf participants)
 - Staff trained in working with their specialist cohorts, including; ability to provide sighted guide supports, understanding of Deaf culture, understanding of the wide range of assistive technology and workplace modifications available, and how they can be (and have been) utilised in the workplace successfully.
 - Demonstrated viability and success in supporting their specialist cohorts

5. Additional benefits of allowing PWD Specialists to submit a response with the aim of operating from commencement in July 2022

- Allowing PWD specialists to submit a response along with the other specialist cohorts will avoid the need to conduct a supplementary RfP process to recruit them later if the need is subsequently identified.
- PWD participants will be able to access services that are tailored to their needs, delivered by knowledgeable staff, and with any required supports available.
- PWD participants are less likely to find themselves under-served or placed in the 'too-hard basket' by providers that lack the resources or expertise to work with them effectively.
- Opening the available specialist cohorts of the upcoming RfP to include PwDs should be a 'risk-free' decision, as there is no additional cost involved, other than what is required to administer the additional contracts.

We thank you for the opportunity to provide feedback on the New employment Services Exposure Draft.

Kind regards,



[REDACTED]

The Royal Society for the Blind (RSB)

[REDACTED]

[REDACTED]

The Royal Society for the Blind (RSB)

[REDACTED]



Please consider the environment before printing. This email and attachments are intended solely for the named addressee. They are confidential and subject to the conditions of the Privacy Agreement Act (2000) and other legal or professional privilege. This email and any attachments are also subject to copyright, and may be copied or distributed by the addressee only, with the consent of the copyright owner. If you are not the addressee or authorised to receive this for the addressee, you must not use, copy, transmit or disclose any information contained herein.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).