

# Blind Citizens Australia

87 High Street Prahran  
PO Box 229 Prahran  
Victoria 3181 Australia  
Telephone 03 9521 3433  
Toll Free 1800 033 660  
Facsimile 03 9521 3732  
TTY 03 9521 1200  
Email: [bca@bca.org.au](mailto:bca@bca.org.au)

The Commissioner  
Job Network Inquiry  
Productivity Commission  
PO Box 80  
BELCONNEN ACT 2616  
Email: [jobnetwork@pc.gov.au](mailto:jobnetwork@pc.gov.au)



Dear Commissioner

Blind Citizens Australia is pleased to provide feedback to the Commission on its draft report **Independent Review of Job Network**.

In the attached document we have addressed those draft recommendations and requests for feedback which appeared to directly impact on people who are blind or vision impaired.

I trust that the submission assists the Commission to review the draft. Should you require any further information please do not hesitate to contact Ms Collette O'Neill, National Policy Officer, on (03) 9521 3433.

Yours sincerely

Maryanne Diamond  
**Executive Officer**

# **Blind Citizens Australia**

## **Response to the Productivity Commission's Draft Report of the Independent Review of Job Network**

### **Recommendation 7.3**

*Shorten the period of eligibility for Intensive Assistance to 6 months*

Blind Citizens Australia does not support the recommendation.

People who are blind can require lengthy assistance to become work ready, particularly if they have lost their sight later in life, as the majority have. For example, a person who has lost their sight through a degenerative eye condition and can no longer read print may require literacy training, computer (re)training to learn to use adaptive software, training in other forms of adaptive technology, or a combination of these. In some cases, six months would not be a sufficient time to complete this retraining.

The recommendation should be qualified to allow for exemptions.

### **Recommendation 7.4**

*Apply similar activity test requirements to Intensive Assistance participants as other programs*

Blind Citizens Australia does not support the extension of activity testing to people with disabilities who receive Intensive Assistance.

The proposal does not take into account the mental, emotional and physical effects of training on a person with a disability, particularly if the disability is newly acquired. It also does not account for the extra difficulty people with disabilities can experience job seeking. People who are blind find each stage of the job search process, from identifying vacancies to attending a job interview, to be more time consuming, labour intensive and tiring. It is simply not realistic to mandate a minimum level of job search activity for a person with a disability, particularly one who is receiving Intensive Assistance.

## **Blind Citizens Australia - Response to the Draft Review of Job Network**

### **Request for Feedback (7.23)**

*Introduction of guaranteed minimum service levels or expenditure for job seekers who have had the duration of their Intensive Assistance extended*

As outlined in our original submission, Blind Citizens Australia would prefer that guaranteed minimum service standards were introduced to protect all job seekers.

Incentives for Job Network providers to retain clients whom they cannot or will not assist further are undesirable. It is preferable that providers who cannot further assist job seekers refer the person to another service that may be able to assist them (subject to the provisos outlined in the response to recommendation 9.5). Mandating minimum levels of service or expenditure should help to remove the incentive.

### **Recommendation 8.1**

*Provision of information to job seekers be enhanced to improve choice*

Blind Citizens Australia strongly supports this recommendation. Job Network providers should assess their information provision strategies and programs against universal accessibility guidelines (see Getting the Message at [www.bca.org.au/getmsg.htm](http://www.bca.org.au/getmsg.htm) and web accessibility guidelines at [www.bca.org.au/webacc.htm](http://www.bca.org.au/webacc.htm)). Improved information provision would assist all users of the Job Network, including people with disabilities and people from non-English speaking backgrounds.

### **Request for feedback (page 8.15)**

*The effectiveness of existing complaints mechanisms and alternatives*

The effectiveness of complaints mechanisms will depend to an extent on the ways they are advertised to users of the Job Network. See the previous response for standards against which the promotion of the complaints mechanisms can be assessed for accessibility.

## **Blind Citizens Australia - Response to the Draft Review of Job Network**

### **Recommendation 9.1**

*Pilot the flexible implementation of the Job Seeker Classification Instrument by Centrelink*

Classification instruments can be blunt and ineffective at detecting the needs of people with disabilities when a single measure is used to assess widely differing needs and barriers.

In principle we support a system where Centrelink staff are given more flexibility to assess the needs of job seekers. However, the success of such a system would depend on the quality of the training staff received. Staff would need to be competent at identifying the broad range of issues that might be indicated by a job seeker presenting with a manifest condition, for example, a vision impairment.

The Draft Report proposes the development of a diagnostic tool to measure barriers to employment for disadvantaged clients (page 9.9). Blind Citizens Australia's experience of Centrelink's Workability Assessment Tables has been that by attempting to cover all disability groups, the needs of people who are blind are not adequately assessed.

### **Recommendation 9.5**

*Re-direction of Intensive Assistance job seekers*

In general Blind Citizens Australia agrees with the recommendation, subject to our opposition to activity testing of people with disabilities. However, we would echo concerns that have been raised during the Commission's public hearings about the recommendation's possible impact on people with disabilities. We would not support a proposal that saw Job Network providers routinely re-referring people with disabilities because they are considered too hard.

The collection of data about who is being re-referred is essential, and the data should be assessed to ensure that people with disabilities are not being ignored by Job Network providers.

The option of re-referring Intensive Assistance clients raises the crucial issue of literacy and numeracy training for people who are blind. Literacy is a key issue for people who are blind as people who can no longer read print are effectively illiterate. Issues of literacy are

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particularly pertinent for blind people from non-English speaking backgrounds; people struggling with English as a second language are less likely to feel confident studying the language in an alternative format.

Unfortunately, students studying a non-print based form of literacy education are not eligible for the Literacy and Numeracy Training Supplement which was announced in the 2001-2002 Federal budget because these courses are not accredited by DEST.

We have urged the Government to work with non-print based literacy education providers to accredit courses and make students eligible for the Literacy and Numeracy Training Supplement, however this barrier remains.

### **Recommendation 9.3**

*If Recommendation 9.5 is not accepted, that Job Network providers not be charged for re-assessment of special needs if Centrelink or another independent organisation establishes the needs exist*

Again, Blind Citizens Australia supports this recommendation if the system is designed to ensure that a Job Network provider cannot re-refer a person simply because they have a disability.

The capacity to re-assess job seekers will be important in relation to people with degenerative conditions which may raise the need for alternative or additional forms of assistance.

### **Request for feedback (page 9.25)**

*The use of incentives to ensure people are re-referred, not parked*

Blind Citizens Australia supports the proposal subject to the program design provisos that have been outlined above. The collection of data about the features of clients who are re-referred will be essential to ensure that people with disabilities are not routinely being moved on or ignored.

## **Blind Citizens Australia - Response to the Draft Review of Job Network**

### **Recommendation 9.7**

*Introduce mechanisms to prevent recurring participation in programs that have proven to be ineffective*

While this recommendation appears to be sensible and economical, we would argue that it can be difficult to separate when a program has been ineffective from a person being unable to find employment because of systemic barriers in the workforce. People with disabilities will often require more resources and assistance to find work because of these systemic barriers.

The Draft Report raises the concept of people being given “budgets” to spend on job seeking (page 9.25). Blind Citizens Australia does not support this concept as such a system cannot adequately account for life circumstances, for example, the acquisition of a disability, nor for the differing costs between and within disability groups.

### **Recommendation 9.9**

*Use the Job Seeker Classification Instrument to determine the level of outcome payments*

Blind Citizens Australia supports payments to Job Network providers being linked to a job seeker’s disability. As has been highlighted in this submission, the support required to get a job seeker who is blind work ready can be intensive, time consuming and expensive. Recognising this in payment terms is fair and will also encourage Job Network providers to persist with job seekers with disabilities. The flexible use of these payments is addressed in 10.21.

### **Recommendation 9.10**

*Target the New Enterprise Incentive Scheme to disadvantaged job seekers*

Blind Citizens Australia agrees strongly that this proposal should at least be piloted.

The high level of systemic discrimination experienced by people who are blind in the labour market can make self-employment a more attractive option. People who are blind have established successful

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small businesses in areas as varied as internet and computer systems analysis, access consulting and massage therapy. However, set-up and ongoing costs of business will often be greater for people who are blind due to their need for adaptive technology, and other disability related costs. These costs can present an initial barrier to the establishment of businesses that would otherwise provide stable and fulfilling avenues of employment. Support to overcome such barriers could be very useful.

### **Recommendation 10.3**

*Creation of payment categories for people who are disadvantaged*

See our responses to 9.1 and 9.9.

### **Request for feedback (page 10.21)**

*ACOSS mixed funding model*

Our comments on the ACOSS model are:

- It may not always be preferable to wait 3 months before conducting at least an initial assessment of a job seeker's needs. For example, a person who is blind's need for literacy training may be manifest. An assessment after 3 months would assist to detect problems that are not manifest.
- The proposal that Job Network providers conduct assessments rather than Centrelink deserves greater consideration. Perhaps the biggest impact would be the significant training implications for Job Network providers, who would require intensive training in the area of disabilities and their impacts.
- We support the wage subsidy model but would argue that it should be expanded to give Job Network providers the capacity to negotiate a more flexible use of subsidies for people who are blind. For example, the subsidy could be used to fund the part-time employment of a personal reader.
- As stated previously, we support the introduction of minimum service levels.

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### **Request for feedback (page 14.12)**

#### *The merit of establishing an independent industry regulator*

Blind Citizens Australia is a strong supporter of service user representation on bodies that have the authority to improve standards of services. For this reason, we would give in principle support to a proposal for an independent regulator to oversee the Job Network.

An industry regulator would have the potential to overcome the limitations of alternative systems, for example, the complaints process available under the Disability Discrimination Act. The complaints process can be cumbersome, intimidating, legalistic and time consuming.

Any alternative system should have two features:

- It should provide for speedy resolution of complaints
- It should have the capacity to assess the quality of services provided by Job Network providers against broad service standards. There will be occasions where a person who is blind has received an unsatisfactory standard of service but where it would be difficult to establish legally that discrimination has occurred. The regulator should be empowered to address cases like this where the decision of whether an adequate standard of service has been provided is not clear cut.

### **Request for feedback (page 14.27)**

#### *Restrictions on simultaneous participation in DEST, FaCS and Job Network programs and problems of overlap*

People who are blind or vision impaired would potentially benefit from being able to participate simultaneously in DEST, FaCS and Job Network programs. For example, a person receiving Intensive Assistance might at the same time undertake study in braille or computer literacy to expand their employment options.