

Submission to the Senate Community Affairs References Committee inquiry into the purpose, intent and adequacy of the Disability Support Pension

Children and Young People with Disability Australia

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Acknowledgements:

Children and Young People with Disability Australia would like to acknowledge the traditional custodians of the lands on which this report has been written, reviewed and produced, whose cultures and customs have nurtured and continue to nurture this land since the Dreamtime. We pay our respects to their Elders past, present and future. This is, was and always will be Aboriginal land.

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Recommendations

Recommendations to ensure Australia's income support system is adequately supporting young people with disability

- Ensure all young people with disability, including those with partial capacity to work, are accessing the Disability Support Pension.
- The Australian Government should review and amend the social security system to ensure that young people with disability who experience job insecurity are not living in poverty. Rates of payments should be raised to support a dignified standard of living, factoring in the extra living costs that are associated with living with disability.

Recommendations to remove unnecessary barriers that prevent people with disability from accessing the Disability Support Pension

- The Program of Support requirement should be removed entirely from the Disability Support Pension access process.
- The Australian Government should implement Australian Federation of Disability Organisations' *Eight Key Principles for a Sustainable Disability Support Pension* (see Appendix A).

Recommendation to ensure young people with disability are supported to find and secure quality employment

- In collaboration with states and territories, the Australian Government should develop and implement a targeted National Youth Disability Employment Strategy to address the distinct environmental factors and needs of young people with disability.

Introduction

Children and Young People with Disability Australia (CYDA) is the national representative organisation for children and young people with disability aged 0 to 25 years. CYDA has an extensive national membership of more than 5,000 young people with disability, families and caregivers of children with disability, and advocacy and community organisations.

Our vision is that children and young people with disability are valued and living empowered lives with equality of opportunity; and our purpose is to ensure governments, communities, and families, are empowering children and young people with disability to fully exercise their rights and aspirations. We do this by:

- Driving inclusion
- Creating equitable life pathways and opportunities
- Leading change in community attitudes and aspirations
- Supporting young people to take control
- Calling out discrimination, abuse, and neglect.

CYDA welcomes the opportunity to provide a submission to the Committee's inquiry into the purpose, intent and adequacy of the Disability Support Pension (DSP). Our view is firmly that the DSP on its own cannot be considered without examining the whole ecosystem of income support, and the systemic employment barriers young people with disability experience. As outlined in this submission, these include:

- The discrimination and insecurity young people experience in the labour market
- Inequitable opportunities to prepare for post school transitions during school years
- Ineffective and harmful government employment supports, programs and conditionality
- Discrimination in industry awards
- Inadequate rates of income support payments, inclusive of the DSP.

Our submission also covers the barriers young people with disability experience in accessing the DSP, which subsequently drives them to rely on sustainably lower income support payments – namely, the rigid, confusing, costly and resource-intensive processes to prove eligibility. This includes the unnecessary and unfounded Program of Support requirement.

This submission draws on the insights and lived expertise of young people in our community; specifically, quotes from young participants who attended the National Youth Disability Summit 2020 and our recent LivedX Consultation series.

Held in September and October 2020, the National Youth Disability Summit was a five day, online virtual conference designed by and for young people with disability with CYDA's support. Over 200 young people from across Australia attended the Summit.

The LivedX Consultations series is a component of CYDA's Our Voices Our Visions: Youth Advocacy project. The LivedX Consultations are currently being conducted to hear from young people with disability about what an ideal future looks like for them, by collecting their ideas and

solutions on topics and issues they deem important. The project is funded by a Youth Advocacy Support Grant from the Australian Department of Education, Skills and Employment.

Young people's experiences in the workforce

Australia's social security system and the DSP cannot be fully scrutinised, understood or improved without also examining the experiences of different groups in the labour market, including young people with disability. Young people with disability are forced to rely on income support as their main source of income at a disproportionate rate because of the discrimination and challenges they experience as they are preparing for, and as they transition into, the workforce.

This section includes young people's perspectives on what having a job means to them. It also outlines some of the barriers that young people in the workforce have experienced or are currently experiencing, which may contribute to future employment participation.

Employment aspirations

The starting point for any considerations about adequate income support for young people with disability is that they want to work – but that the systemic and structural barriers they face punish them in their efforts to secure well paid and meaningful work.

Those in our community have told us they are hungry, ready, and excited to find and have a job. They want to share their passions and knowledge and contribute to the community. Equally, young people want to reap the benefits that come with being employed, such as meeting new people, developing new skills, and earning an income that allows them to be independent and pursue a life that is important to them.

Comments from National Youth Disability Summit 2020 participants:

"[Having a job] gives me the independence to start my life. That's huge! That's freedom."

"[Having a job means to me] independence. ... [A]t the moment I'm on the DSP, which I am grateful for, but at the same time it's something that ... I'm worried that it's like not infinite. So, being able to work and have an income that I sort of have control over and it's also something that, if I'm allowed to say, in something that I love doing, that would be fantastic. It would be catering to social needs, financial needs, yeah, it's pretty important I think."

"I find that a lot of people, just like generally in my life, seem to think of having a job as just as something they have to do to get money ... and that it's not realistic to enjoy your job or anything like that. And I guess that I have had the opposite experience as a person with some kind of like, invisible illness where having a job ... gives you independence. If you can hold down a job you can live outside of situations where you may not be safe or comfortable. You don't have to rely on an unreliable government system."

"I just think a job is one of those things everyone does and it's something they can do with their passions. ... [I]t's a way to not only, I guess, earn money, but also to find enjoyment and purpose and helping other people."

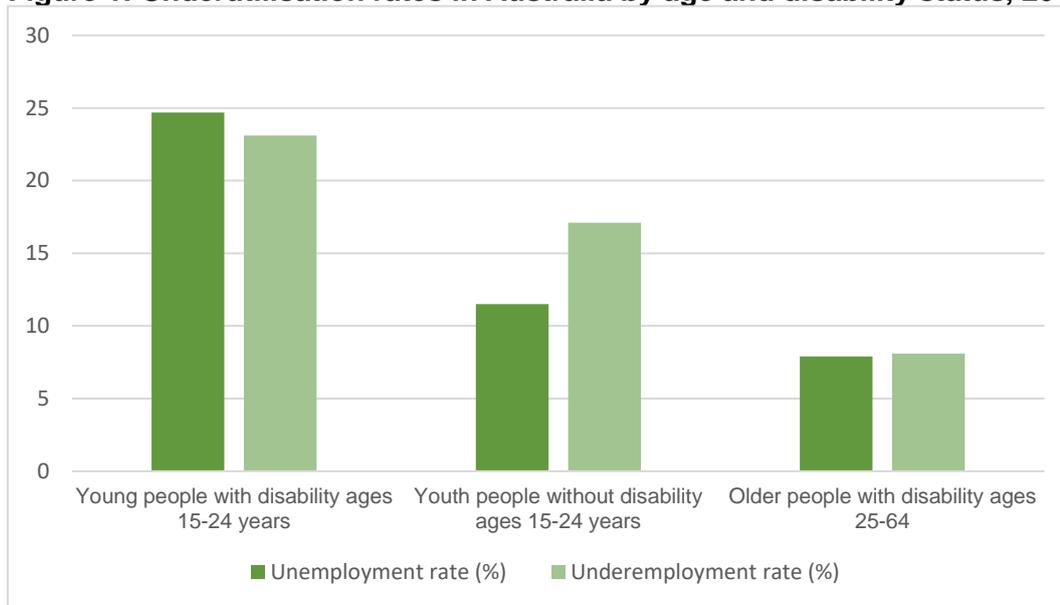
Unemployment and underemployment of young people with disability

Young people with disability experience high rates of unemployment. Data collected by the Australian Bureau of Statistics prior to the COVID-19 economic downturn demonstrated that one quarter of young Australians with disability in the workforce were unemployed. The cohort are more

than twice as likely to be unemployed compared to their peers without disability and older people with disability.¹

For those who do find employment, many are not getting the hours they want or need or are available to work. A further 23 per cent of young people are underemployed; meaning half of all young people with disability in the workforce are underutilised.^{2,3} The underemployment rate of young people with disability is also higher than young people without disability, and nearly three times than older people with disability.

Figure 1: Underutilisation rates in Australia by age and disability status, 2018



Source: Australian Institute of Health and Welfare (2020)

Jobs for young people are insecure, precarious and force them into poverty

Like their peers without disability, young people with disability are more likely to be hired in roles that commonly offer fewer hours, and provide precarious and seasonal employment, and reduced economic security. For instance, nearly one quarter of young employees with disability are sales workers,⁴ including occupations such as general sales assistants and check out operators. Of all occupation groups, sales workers have the lowest average hourly total cash earnings (\$28.50) and the second lowest weekly hours (25.6 hours).⁵

¹ AIHW. (2020). *People with disability in Australia*. Available at [People with disability in Australia, Employment - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports/100-people-with-disability-in-australia/employment)

² Combined rates of unemployment and underemployment

³ *ibid.*

⁴ *ibid.*

⁵ Australian Bureau of Statistics. (2019). *Employee Earnings and Hours, Australia*. Available at [Employee Earnings and Hours, Australia, May 2018 | Australian Bureau of Statistics \(abs.gov.au\)](https://www.abs.gov.au/employment/employee-earnings-and-hours)

The occupation group which offers the lowest average weekly total hours paid is community and personal service workers⁶ – the third most common occupation for young people with disability.⁷ This work is often characterised by irregular hours and increased precarity.

As a *person with disability*, young people with disability are more likely to be over-educated for their roles – where their education level is above the norm for peers in the same occupation.⁸ As a *young person* entering the workforce, because of the changing nature of the labour market and increased competition, young people with disability are more likely to take jobs that do not fully use their skills. Research indicates that young people who take these ‘low quality’ jobs have higher chances of longer-term unemployment and reduced future wage growth.⁹ Young people with disability therefore experience intersectional disadvantage in seeking and maintaining employment.

Young people face discrimination as they transition into the workplace

Lack of awareness and misconceptions about people with disability remains a significant barrier to employment, including for young people. A decade on from the influential *Shut Out* report identifying that few employers were willing to hire people with disability¹⁰, almost two thirds of employers are largely uncommitted to employing jobseekers with disability¹¹. Despite research finding that people with disability take fewer days off and less sick leave, and have a higher retention rate¹², a recent community survey¹³ demonstrated that there are persistent underlying community beliefs that people with disability are less productive employees than those without disability.

Concerningly, this same survey demonstrated that one in five people agreed or strongly agreed that employers should be allowed to refuse to hire people with disability, with a further one in four ambivalent on the topic. Compounded by the discriminatory lens with which society often views young people, it raises the question that even if young people with disability were fully equipped with every skill and resource necessary to thrive in the workforce – would the workforce ever even grant them a fair chance?

Recruitment processes, and lack of inclusive recruitment processes, are also a barrier to employment for people with disability.¹⁴ CYDA often hears from young people in our membership that they believe recruitment processes dismissed their abilities before employers even had the

⁶ *ibid.*

⁷ AIHW. (2020).

⁸ Jones, M., Mavromaras, K., Sloane, P., & Wei, Z. (2014). Disability, job mismatch, earnings and job satisfaction in Australia. *Cambridge Journal of Economics*, 38(5), 1221-1246.

⁹ de Fontenay, C., Lampe, B., Nugent, J. and Jomini, P. (2020). *Climbing the jobs ladder slower: Young people in a weak labour market*. Available at <https://www.pc.gov.au/research/supporting/jobs-ladder/jobs-ladder.pdf>

¹⁰ National People with Disabilities and Carer Council. (2012). *SHUT OUT: The Experience of People with Disabilities and their Families in Australia*. Available at <https://www.dss.gov.au/our-responsibilities/disability-and-carers/publications-articles/policy-research/shut-out-the-experience-of-people-with-disabilities-and-their-families-in-australia>

¹¹ Kellock, P. (2020). *The Employer Experience: Hiring young people with intellectual disability*. Ticket to Work. Available <https://tickettowork.org.au/research/article/the-employer-experience-hiring-young-people-with-i/>

¹² Australian Safety and Compensation Council. (2007) *Are People with Disability at Risk at Work? A Review of the Evidence*. Commonwealth of Australia.

¹³ Bollier A.M., Krnjacki, L., Kavanagh, A., Kasidis, V., Katsikis, G., & Ozge, J. (2018). *Survey of Community Attitudes toward People with Disability: A report for the Victorian Department of Health and Human Services*. Melbourne, VIC: Disability & Health Unit, Centre for Health Equity, University of Melbourne.

¹⁴ Moore, K., McDonald, P., & Bartlett, J. (2018). Emerging trends affecting future employment opportunities for people with intellectual disability: The case of a large retail organisation. *Journal of Intellectual & Developmental Disability*, 43(3), 328–338. <https://doi.org/10.3109/13668250.2017.1379250>

chance to get to know them and the value that they could add. Further, some fear that disclosure of their disability, or the “D-word”, will decrease their chances of getting a job.

Comments from National Youth Disability Summit 2020 and LivedX consultation participants:

“One of the things is access. Big problem for me with a physical disability and using a wheelchair. ... I applied for a role and got to the interview stage where there was a training session for about 20 people. When I got there the room wasn’t accessible. I got in touch with the people and they said, ‘Oh, we’ll follow up with you afterwards’, but then they never followed up.”

“He said earlier in the year he was going to hire me ... then when I went back and asked for the job he said, ‘Nah, we don’t have any work’, but didn’t say why.”

“... [I]f it [a job application] ever had to ask if you had a physical impairment and I clicked ‘yes’ it would just close and say, ‘Sorry, you’re not suitable for this role’. For me that was a bit hard because I thought, ‘Oh, if they met me and realised I probably still could have done the things even though I have a disability’, but I also don’t want to get in trouble for lying. Because also, I’m also very proud it, so I also don’t want to ever say, ‘Oh, no I don’t have it’, but then it’s kind of sad when they just [say], ‘Oh, nah, it’s not for you’.”

“So I had studied for five years, a graduate degree. ... I wasn’t receiving any pension supports and it was really frustrating. And then I sent application[s] in for many, many jobs to over, probably over 2000 jobs, and it was really difficult to communicate with interpreters, and I went for 38 interviews or so, and then three years ago, I was given an opportunity for casual work, and then I was employed [with an organisation] and you know that’s a part time role, but my goodness, you know, Deaf people, people with various disabilities, blind people, Deafblind people face so many barriers to just gaining employment.”

It is essential the Committee understands that not only do young people with disability experience discrimination in the workforce, but they also experience discrimination in the pivotal years as they are preparing to transition to the workforce – which then has subsequential impacts on young people being forced to rely on income security as their main source of income. Because of the low and prejudicial expectations others hold about young people with disability, they are often excluded from receiving the same career supports and opportunities as their peers. This includes (unbiased) subject selection and post-school transitions advice, work experience, and part-time employment during school years.

In previous submissions¹⁵, CYDA has advocated for young people to have equitable opportunities and support in their school years. Without addressing the discrimination students with disability experience as they enter into the education system and throughout their schooling, disparities in employment and receipt of income support will never be resolved.

¹⁵ CYDA. (2020). *The Review of Senior Secondary Pathways into Work, Further Education and Training: Submission to the Education Council*. Available at [review_of_senior_secondary_pathways_into_work_further_education_and_training.pdf \(cyda.org.au\)](https://www.cyda.org.au/review-of-senior-secondary-pathways-into-work-further-education-and-training.pdf); CYDA. (2020). *Submission to the National Disability Strategy beyond 2020*. Available at [submission_to_the_national_disability_strategy_beyond_2020.pdf \(cyda.org.au\)](https://www.cyda.org.au/submission-to-the-national-disability-strategy-beyond-2020.pdf)

Emma's story highlights the discrimination young people with disability experience in the education system and workforce.

After completing Year 12, Melbourne school-leaver Emma* signed up with a Disability Employment Service, which connected her with a company seeking an administrative assistant. Emma, who is deaf, successfully interviewed for the role, but on her second day in the job she was asked to take minutes at a team meeting.

"They were surprised and confused when I couldn't do it," she says.

"They made me try anyway."

Emma underwent a work assessment so she could receive the support she needed. She tried "really hard" at the job and "stumbled through".

"I had a special phone installed and tried to make it work. They wanted me to answer the phone, so I tried, but any time I got someone with an accent or who mumbled another team member had to take it."

After a month, Emma's boss called her in for a meeting.

"He outright said, 'If I had known how deaf you were, I wouldn't have taken you on'.

"Three weeks later they fired me."

The company paid Emma until the end of her trial period, which she considers "guilt money".

Sadly, Emma knows her experience isn't rare.

"I don't know a single deaf person who hasn't been fired because of their disability," she says.

"Communication disabilities are [on] another level. It's different when *you* have to provide the accessibility on an ongoing basis."

The staff at Emma's employment service were "really sad and disappointed" by the outcome.

"Most of their staff had a disability, so I was being supported by people who really understood."

Emma's early career experience followed challenging years at a public high school. She was diagnosed with post-lingual hearing loss in Year Eight and given hearing aids but no sign language training or other non-medical assistance.

"I didn't really get offered any support, and nor did I know what to ask for," she says.

Emma developed severe fatigue, which is common among deaf people, and says she was very quickly labelled by teachers as a 'bad kid'.

"Once you've got the label, you can't shake it off.

"My marks were obviously pretty terrible, and I had some pretty typical deaf person issues – accidentally making noises without realising, accidental shouting – that I think they thought I was doing for fun."

Although her homeroom teacher was told of her diagnosis, the school did little to support Emma, and she is unsure whether her other teachers were ever notified.

“I think they just wrote me off as a bad student,” Emma says.

“Post-lingual hearing loss quite often means that you don’t experience any ‘deaf accent’ or speech differences. If you met me, you probably wouldn’t pick that I have basically no hearing. I sound fairly ‘normal’.

“Invisible disability is a really different thing and a lot of people just don’t take it seriously. Even now I have different strategies I use to make people take it seriously.”

The school environment became particularly tough in Year 11 when Emma began doing complex subjects without any real education support. She decided to leave and complete her VCE at TAFE, where the more flexible class timetable helped her cope with fatigue, and “nobody had any preconceived notions of me”.

Nonetheless, learning at TAFE still presented challenges. In Year 12, Emma’s class was screened a documentary that would then be the subject of an essay – without any subtitles.

“The teacher asked me to ‘just hear what I can’, which was nothing. I wrote about three lines, basically saying that I’d been asked to write an essay on a movie I couldn’t hear. Got an A for it.”

Without any meaningful career guidance or support provided from either the school or TAFE – “certainly my disability wasn’t really mentioned” – Emma was unsure about the path ahead after graduating Year 12.

“I decided not to pursue university at 18 because it all felt too hard,” she says.

“I tried a TAFE course but dropped out because the classes were almost entirely talking and I was exhausted.”

After a period of “patchy” employment following the administrative job, Emma began volunteering for a not-for-profit in the community services sector. This turned into a paid role with the organisation doing social media and communications work.

Several years after graduating, Emma did attend university, receiving the support she needed through the university’s disability office. She graduated in the top 15 per cent of students undertaking her degree, and is now working in the disability advocacy and support space.

Reflecting on her school and school-leaver years, Emma says the biggest problem she faced was not having her disability – or her words – taken seriously.

“I pass for a hearing person but the sheer amount of energy it takes to do that has always caused me severe fatigue.

“A good deal of my work and school problems could have been avoided by listening to my words, not making an observation based on the way I present.”

***Name has been changed**

Australia's income support system is too rigid and forces young people into poverty

Recommendations

- Ensure all young people with disability, including those with partial capacity to work, are accessing the DSP
- The Australian Government should review and amend the social security system to ensure that young people with disability who experience job insecurity are not living in poverty. Rates of payments should be raised to support a dignified standard of living, factoring in the extra living costs that are associated with living with disability.

As young people with disability experience complex barriers in the workforce (as discussed in the previous section), it is essential that the government provides an adequate safety net for young people who cannot secure work, so they are not forced to live in poverty.

Young people with disability are being denied access to the DSP

With the harsh and rigid access requirements that have been introduced by the Australian Government over the last decade¹⁶, there is an increasing divide between young people with disability who are considered to be 'deserving' of receiving the DSP, and those who are not. As result, many young people are driven instead to access the JobSeeker or Youth Allowance Payments, which provide significantly lower rates of pay than the DSP.^{17,18,19} Data obtained by CYDA from the Department of Social Services shows that:

- The number of Jobseeker (known as Newstart prior to 2020) recipients aged between 20 and 25 years with partial capacity to work has increased by 372.8 per cent in the decade from 2009, growing from 5,308 in 2009 to 25,096 in 2020
- The number of Youth Allowance recipients under 19 years old with partial capacity to work has increased by 174.9 per cent, from 2,299 in 2009 to 6,319 in 2020
- The number of Youth Allowance recipients aged between 20 and 25 years with partial capacity to work has increased by 970.3 per cent, from 936 in 2009 to 10,018 in 2020

¹⁶ See *The DSP access process is onerous, unnecessarily complex and biased* section of this paper

¹⁷ Services Australia. (2021). *Jobseeker Payments: How much you can get*.

<https://www.servicessaustralia.gov.au/individuals/services/centrelink/jobseeker-payment/how-much-you-can-get>

¹⁸ Services Australia. (2021) *Youth Allowance payments for job seeker: How much you can get*.

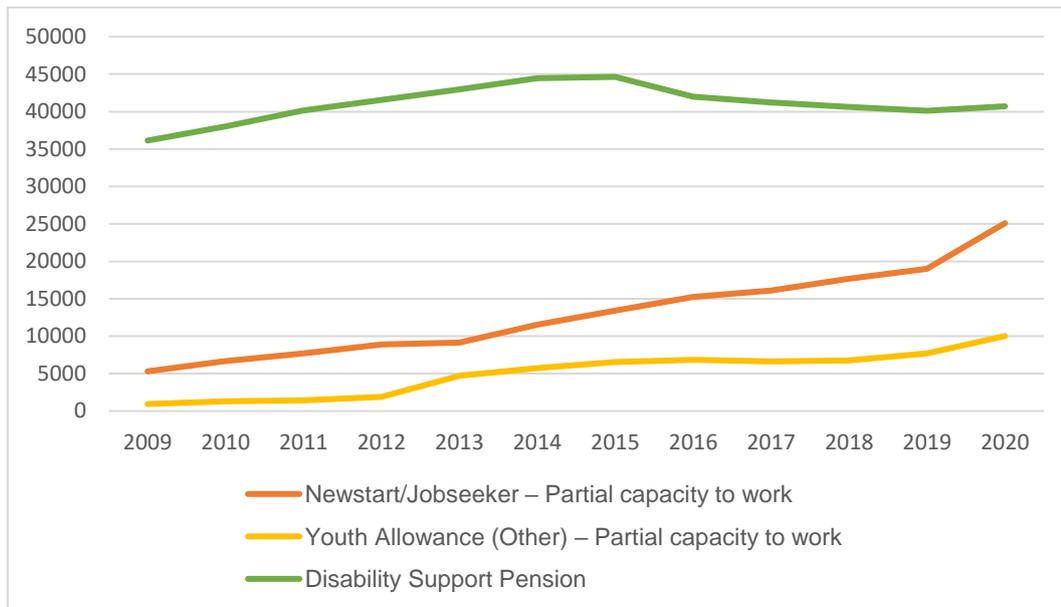
<https://www.servicessaustralia.gov.au/individuals/services/centrelink/youth-allowance-job-seekers/how-much-you-can-get>

¹⁹ Services Australia. (2020). *Payment rates*. Available at

<https://www.servicessaustralia.gov.au/individuals/services/centrelink/disability-support-pension/how-much-you-can-get/payment-rates>

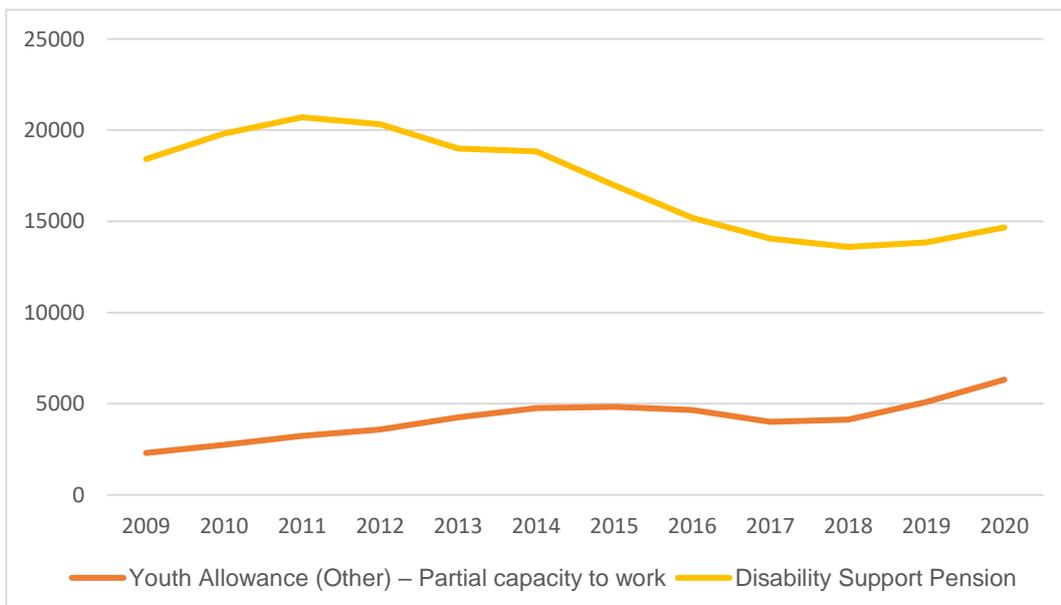
- The number of DSP recipients under 19 years old has decreased by 20.4 per cent, from 18,414 in 2009 to 14,662 in 2020
- The number of DSP recipients aged between 20 and 25 years has increased by 12.6 per cent, from 36,128 in 2009 compared to 40,690 in 2020.

Figure 2: Trends from 2009 to 2020 of Newstart/Jobseeker Allowance, Youth Allowance with partial capacity to work and Disability Support Pension recipients aged 20 to 25 years



Source: Department of Social Services data provided to CYDA

Figure 3: Trends from 2009 to 2020 of Youth Allowance with partial capacity to work and Disability Support Pension recipients aged 19 years and under



Source: Department of Social Services data provided to CYDA

It is also important to note that the decline in young people accessing the DSP has had flow-on impacts to other supports and programs that they can access. Young people have shared with CYDA that DSP eligibility is often used as an access criterion for other supports, including community programs, supports in tertiary education, and disability specific housing supports.

The DSP and other social security payment rates are insufficient

People with disability are more likely to be reliant on income support payments, inclusive of the DSP, as their main source of income. Nearly half of young people with disability aged 15 to 24 years (49 per cent) rely on income support payments, compared to 14 per cent of people aged 15 to 24 years without a disability.²⁰ By no coincidence people with disability are also more likely to experience poverty, with 37 per cent adults experiencing poverty having disability.²¹ More specifically, 41 per cent of households whose reference person receives the DSP are living below the poverty line.²² These figures are also modest and do not factor in the increased costs incurred with living with disability.

CYDA believes that the DSP rate must be raised to ensure people with disability are not living in poverty and have the ability to live independently, in a safe environment of their choosing. However, as outlined in the previous section, many young people with disability are also living on alternative payments with offer even less income and are provided on the basis on more ongoing conditionality.

We advocate that these payments must also be raised so that all people, inclusive of young people with disability who experience increased barriers to gaining employment, are receiving support that provides a dignified standard of living.

²⁰ AIHW. (2019). People with disability in Australia: In brief. Available at [People with disability in Australia 2019: in brief \(Full publication:21Aug2019Edition\)\(AIHW\)](#)

²¹ ACOSS. (2020). *Inequality in Australia, 2020 Part 2: Who is affected and why*. Available at [Inequality-in-Australia-2020-Part-2-Who-is-affected-and-why_FINAL.pdf \(antipovertyweek.org.au\)](#)

²² *ibid.*

The DSP access process is onerous, biased, and unnecessarily complex

Recommendations

- The Program of Support requirement should be removed entirely from the DSP access process
- The Australian Government should implement Australian Federation of Disability Organisations' *Eight Key Principles for a Sustainable Disability Support Pension* (see Appendix A)

This section details how the complex access process creates disproportionate barriers in terms of who meets DSP eligibility. People without significant personal resources to draw on – such as money for required medical evidence; understanding, ability or support to navigate the process and complete forms; and access to medical professionals – are disadvantaged by the process and the administrative burden it places on the individual.

This section also identifies issues with the Program of Support access requirement and why it should be removed entirely.

The access process is overly complex, puts the burden on the individual, and impacts different groups disproportionately

In addition to meeting residency and income and assets test requirements, to meet access to the DSP, young people must:

- Prove they have a physical, intellectual or psychiatric condition which is permanent
- Prove they have a continuing inability to work (i.e. that they are unable to work 15 hours or less a week at minimum wage)
- Demonstrate impairment in line with the set Impairment Tables.

For many, the application process can take years. In the meantime, young people are required to live on lower income supports such as Jobseeker or Youth Allowance.²³ Many others who experience difficulties meeting mutual obligations of Jobseeker or Youth Allowance, who cannot secure quality employment, and/or who are 'employed' through Australia Disability Enterprises while trying to access the DSP are receiving minimal to no income at all.

Young people in our community have told us the DSP access process is overwhelming, and they are not confident on how, or if, to start the process. In applying, individuals are required to navigate and complete complex forms and impairment guides, as well as source and provide supporting

²³ See the *Young people with disability are being denied access to the DSP* section of this paper

medical evidence. This heavy administrative burden creates disproportionate impacts and has implications for who meets access – with those equipped with more personal resources, such as money, literacy and English skills, access to medical professionals and people to support them, more likely to succeed. Research shows those who are supported while completing the DSP application claim form are more likely to have their claim granted than those who complete the form without assistance.²⁴

For those without personal resources to draw on, the administrative burden creates additional barriers and prevents eligible claimants to receive the DSP. This administrative burden can also have disproportionate impacts on people with different disability types, such as people with cognitive, intellectual or psychosocial disability, who may have more challenges interpreting and gathering complex information, completing paper work and communicating their situation to people in power.²⁵ A young person in our community who had met partial eligibility for the DSP told CYDA that without the support they had received from an external organisation, they don't believe they would have made access and would have been deprived of necessary financial supports.

CYDA has been told the strongest asset a person applying for the DSP can have is a doctor who understands the DSP, the impairment tables and how to provide evidence in the way the assessors are looking for. This creates unfair divisions between people who have choice between medical professionals and those with limited options, such as those in remote and regional areas or those reliant on the public health care system.

The onerous administrative workload placed on the individual, including gathering medical evidence, is also expensive. CYDA is concerned that our community – particularly those who are surviving on Jobseeker and Youth Allowance payments and experiencing job insecurity in the labour market – are costed out of accessing the DSP.

Until it was abolished in 2015, the Treating Doctor's Report (TDR) was an important mechanism that helped prevent this division between people who can and cannot afford and source the necessary medical evidence required to meet DSP access. The TDR was a Centrelink medical report form for treating health professionals that was designed to elicit information relevant to assessing medical qualification for the DSP.²⁶ A research project led by the National Social Security Rights Network analysing the experiences of DSP client experiences since the 2015 reforms found that the removal of the TDR created financial and administrative barriers for individuals seeking medical evidence and resulted in worthy claimants being denied DSP payments.²⁷

Our community, particularly young people with psychological disability, have also raised concerns around the rigidity of the requirement to demonstrate that their disability is a “fully diagnosed, treated and stabilised condition”. Young people have expressed that they feel influenced to take medications or do treatments against their will in order to ‘prove’ their disability. Further, the costs

²⁴ Collie, A., Sheehan, L. R., & Lane, T. J. (2021). Changes in access to Australian disability support benefits during a period of social welfare reform. <https://doi.org/10.1101/2020.04.30.20041210>

²⁵ *ibid.*

²⁶ National Social Security Rights Network. (2018). *Disability Support Pension (DSP) Project: A snapshot of DSP client experiences of claims and assessments since the 2015 changes*. Available at [NSSRN-DSP-Report-2017-BRQ-case-snapshot-2018_01_31.pdf \(ejaustralia.org.au\)](https://www.ejaustralia.org.au/sites/default/files/2018-01/2018-01-31-2018-01-31.pdf)

²⁷ *ibid.*

associated with various treatments to demonstrate one's disability has been 'fully treated' also create a barrier to access.

While CYDA acknowledges the Department of Social Services (DSS) is currently reviewing the DSP Impairment Tables, the tables are only one component of the process causing considerable stress for our community, and we ask that the Department closely consider the findings of the Committee's inquiry.

We also draw the Committee's attention to the lack of consultation and engagement with people with disability undertaken by DSS throughout the impairment table review, about which we are very concerned. More than halfway through the public consultation process, the Department had failed to provide the community with Easy Read or Auslan versions of the issues paper, restricting consultation access for many people with disability.²⁸

Social security is a core right and people with disability must be supported to secure this entitlement. This includes removing unnecessary obstacles and providing necessary and timely supports so that all people with disability have equal understanding and ability to access the DSP. As such, CYDA recommends the adoption of the Australian Federation of Disability Organisations' *Eight Key Principles for a Sustainable Disability Support Pension*.²⁹ These principles are included in full in Appendix A.

The Program of Support is an unnecessary and unfounded obstacle for DSP claimants and should be removed

The most problematic aspect of the access process for the DSP is the Program of Support (POS). Individuals under 35 years who do not meet 20 points or more under a single impairment table are obliged to complete 18 months of participation in activities,³⁰ such as job searching or training, which are intended to support them to find employment. Once a person has successfully completed 18 months of assigned activities with an employment service provider and proved that they have been unsuccessful in obtaining employment with support, they can then apply for the DSP.

There are very few exceptions to this requirement, including for individuals with one or more conditions who can demonstrate they meet 20 or more points cumulatively over several impairment tables. This narrow scope of understanding of the factors that can severely impact a person's ability to find and maintain work is crude and dismissive of people's daily reality.

Further, once a person is participating in a POS, if they have an approved medical exemption from participating in activity requirements, this time does not count towards the 18-month requirement. So, because of impairment related to their disability, it can take a person several years to meet this 18-month hurdle before they can demonstrate that their impairment prevents their ability to secure work.

²⁸ As at 9 July 2021, there were no Easy Read or Auslan versions of the issues paper on the DSS Engage website, the only avenue where the Department is inviting feedback from the broader community. The consultation period opened on 1 June 2021 and closed on 31 July 2021.

²⁹ Australian Federation of Disability Organisations. (n.d.). *8 Key Principles*. Available at [8 Key Principles | Australian Federation of Disability Organisations \(afdo.org.au\)](https://afdo.org.au/8-Key-Principles)

³⁰ To be completed in three years

The POS requirement is a large barrier for many DSP applicants. Lack of awareness of the requirement and the complexity it involves are critical issues for many claimants.³¹ Further, the mandatory activity obligations themselves and the negative experiences our community have in engaging with employment service providers³² (detailed in the next section) prevent many people from completing the 18-month requirement in full or applying for the DSP entirely.

Fundamentally, to CYDA's knowledge, there is no evidence to support DSS' rationale of the POS or demonstrate that the burdensome requirement improves people with disability's ability to find and maintain employment. Instead, we view the requirement as a means to gatekeep or deter people with disability from accessing the social security they are entitled to. As such, CYDA advocates that the POS should be removed from the DSP access process entirely.

Australia's employment and social security systems and structures are failing young people

Recommendation

- In collaboration with states and territories, the Australian Government should develop and implement a targeted National Youth Disability Employment Strategy to address the distinct environmental factors and needs of young people with disability.

As detailed in this paper's first section, young people with disability want to work and find employment that meets their needs and strengths – however, there is currently no coordinated approach across governments, or in individual governments, to support this to happen. The needs of young people with disability are generally absent in both youth employment strategies and disability employment strategies.

This section explores the pitfalls of the current structuring of employment services and the DSP and how they are not supporting, and in cases preventing, young people to find employment. A strong employment strategy must sit alongside a just and adequate social income support for when young people cannot find work.

This notion was captured by a comment from a young participant at one of CYDA's recent LivedX consultations, where they explained that they wanted to see more investment to support people to *"get opportunities with work and not need the Disability Support Pension anymore"*

"... [I]t's a matter of not just getting a pension, it's enabling people to gain employment. So, you know, really without employment it's almost as if the brain cells in your brain stop working. So having employment gives you, you know, motivation, it gets those cells

³¹ National Social Security Rights Network. (2018). *Disability Support Pension (DSP) Project: A snapshot of DSP client experiences of claims and assessments since the 2015 changes*. Available at [NSSRN-DSP-Report-2017-BRQ-case-snapshot-2018_01_31.pdf \(ejaustralia.org.au\)](https://www.ejaustralia.org.au/sites/default/files/2018-01/2018-01-31.pdf)

³² POS are generally completed partially or wholly through government employment services, such as jobactive or Disability Employment Services.

working, you know, it leads to other desires, but when the barriers start at employment the barriers continue on and it is a form of discrimination.”

CYDA echoes the call of this young person and advocates for the development of a National Youth Disability Employment Strategy. To be effective, this strategy must be co-designed, delivered and monitored with young people with disability. In previous submissions³³, we have detailed what this strategy should entail, including:

- Be developed, implemented and evaluated with young people to ensure it understands and meets the cohort’s experiences, strengths and needs
- Promote quality work experience opportunities during school years
- Review, analyse and critique the existing employment services and supports that young people engage with and develop a new, evidence-based national coordinated approach
- Review funding arrangements and outcomes in all states and territories for school and post school programs for students with disability and develop a nationally consistent, evidence-based post school transition supports framework
- Have a focus on increasing education outcomes (school and tertiary)
- Include targeted approaches for young people within the disability community that risk experiencing increased marginalisation in the workforce, such as young Aboriginal and Torres Strait Islander peoples, gender diverse young people and different disability groups
- Address negative attitudes and assumptions in employers and the people in young people’s lives about young people’s post school prospects. \

The access process to the DSP disincentivises employment

The 15-hour capacity paid work limit as a qualification for the DSP is too low and disincentivises employment. Young people in our community have told us that the rigid limit puts them in a difficult position when wanting to apply for the DSP, though they are already employed or seeking work part-time work. With 15 hours of paid work, or even just above, not being enough hours to sustain an independent life, young people are obliged to consider whether they should even try and find (or keep existing) part-time employment, as the DSP could offer them more financial security.

One of CYDA’s community members told us that they thought the current structure “discourages” people with disability to be employed and that they “feel like [they’re] being sh*t on by the government for having a job in the first place.” Noting the limit is for ‘paid’ employment, the young person further added this access requirement is encouraging people with disability to enter into supported employment, such as through Australian Disability Enterprises, rather than open employment, with offers full wages and opportunities to career development and progression.

Once an individual has been granted access to the DSP, there is more flexibility in the amount of paid work that can be done per week without losing the payment entirely. Young people have told us that they wish to see this flexibility also apply to the access process, so they are not forced to

³³ CYDA. (2021). *CYDA’s submission the National Disability Employment Strategy consultation*. Available at [Resources \(cyda.org.au\)](https://resources.cyda.org.au); CYDA. (2021); CYDA. (2021). *CYDA’s submission to the Senate Select Committee on Job Security: Young people with disability and job insecurity*. Available at [Resources \(cyda.org.au\)](https://resources.cyda.org.au); CYDA. (2021). *Drive inclusion and equity for children and young people with disability: Pre-budget 2021–22 submission*. Available at [pre_budget_submission_final.pdf\(cyda.org.au\)](https://pre-budget-submission-final.pdf(cyda.org.au))

give up employment, and all the good things that come with being employed including and beyond receiving a wage, to receive the income support they are entitled to.

Current employment services and programs are not-fit-for-purpose

Many young people with disability, whether because they were denied access to the DSP or are in the process of applying and are completing their POS requirement, are participating in various government employment services and programs – none of which are designed with their needs at the centre.

Disability Employment Services are failing young people

In CYDA's recent submission to the National Disability Employment Strategy consultation³⁴, we advocated that the Disability Employment Services (DES), of which 13 per cent of the current caseload are aged 25 years or younger³⁵, should be overhauled entirely. Approximately 10 per cent of the caseload are recipients of the DSP, including participants with compulsory participation requirements.³⁶ In its current state, the services' design, outsourced contracting, and presence of the punitive Targeted Compliance Framework are not conducive to addressing the barriers young people with disability experience in the workforce or support them to find suitable and stable work.

Young people in our community also frequently raise the issues they encounter with DES providers and the stress it causes them. Namely, we often hear that:

- The services lack personalisation and providers do not consider, or care about, young people's employment aspirations
- Young people are pushed into jobs regardless of fit
- Providers lack an understanding of disability and how it can impact some young people's ability to find work or complete activity requirements
- Providers hold negative assumptions about and towards young people, particularly that they are lazy and are not trying to find employment.

Recently at the one of our LivedX consultations, young people shared with us their experiences with disability employment services. One participant explained that after their studies they were very eager to work and completed countless applications to different jobs. In the job searching process they encountered barriers, such as difficulties using interpreters, to gaining employment. They continued to reflect on their experiences looking for employment and their interactions with disability employment services, which they described as "*not great*".

"They [disability employment service providers] say that I'm lazy. Yeah, they do they say, 'Oh, you just don't want to find work, you're just lying. You're just making things up', and I'm there proving that I do want to find work I'm actually really motivated to find work. And then, I feel that they're actually not helping me find the work and I feel they're

³⁴ CYDA. (2021). CYDA's submission the National Disability Employment Strategy consultation. Available at [Resources \(cyda.org.au\)](https://resources.cyda.org.au)

³⁵ Labour Market Information Portal. (2021). *DES Monthly Report - June 2021*. Available at <https://lmp.gov.au/PortalFile.axd?FieldID=3195267&.xlsx>

³⁶ Department of Social Services. (2020). *Mid-term Review of the Disability Employment Services (DES) Program*. Available at [DES Mid-term Review \(Draft Final Report\) \(dss.gov.au\)](https://dss.gov.au/DES-Mid-term-Review-Draft-Final-Report)

the ones who are getting the benefits financially and they're getting all of this money from the government to do their job, and I don't feel they're doing it well and it puts the burden and the pressure on me and other people around me and yeah, that's very difficult."

Another participant shared their story interacting with "disability employment services run by the government" and how it has impacted their life.

"They [disability employment service providers] are not lenient at all. They force you to apply for so many jobs and if you have severe depression and really bad executive functioning and you have no energy to do anything at all because you just can't, they don't care. They are like, "No, you have to otherwise we'll cut your payments" and that obviously means you can't eat, you'll get kicked out of your house. And they don't care. And with autism specifically, it's very routine based and if your routine's changed your whole world is turned upside down and I have explained that to my job providers and they're like, 'Oh, well Centrelink say that if you can't do this on this day because you want to go and see one of your friends that's not a good enough reason' and I'm like, "Okay, but it's not just that.' And I think the employment service providers needs so much education on the disabilities they claim to support because there's none. They just accuse you of not trying hard enough and I've actively have had employment providers and their managers say to me that if I was really trying I'd be applying for more than my threshold. And it felt so horrible and I ended up crying."

There is inadequate public evaluation or monitoring of young people's employment outcomes across government services and supports

There is currently no national employment program for young people with disability. In addition to DES, some young people find themselves in jobactive, a program which was found by a Senate Inquiry to not address the barriers to employment for jobseekers with disability or young people.³⁷ A portion³⁸ find themselves in Transition to Work – a youth-specific employment program that addresses both supply and demand sides of employment – though access to the program is heavily restricted by a range of eligibility criteria. Others can find themselves in innovative, youth and disability specific programs, but access to state-based programs generally require the young person to not be receiving income support.

For the portion of young people who are eligible for NDIS funding, the youth-specific School Leaver Employment Supports (SLES) is an option. SLES is a support designed to help young people with disability prepare, look for, and gain employment as they transition from school to employment. However, due to the funding and outsourcing nature of the program, there is no clear evaluation data to determine if the support is effective or if there is consistency across providers. Despite this lack of data, NDIA figures³⁹ show that the rate of young participants in paid work only increased by

³⁷ Senate Education and Employment References Committee. (2019). *Jobactive: failing those it is intended to serve*. Available at https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/024217/toc_pdf/Jobactivefailingthoseitisintendedtoserve.pdf;fileType=applicationpercent2Fpdf

³⁸ As at 30 June 2021, 11 per cent of the Transition to Work caseload were young people with disability. However, ; Labour Market Information Portal. (2021). *jobactive and Transition to Work (TtW) Provider Caseload by Selected Cohorts*. Available at <https://lmp.gov.au/PortalFile.axd?FieldID=3193105&.xlsx>

³⁹ National Disability Insurance Agency. (2020). *Employment Outcomes 30 June 2018: NDIS participants, their families and carers*. Available at <https://data.ndis.gov.au/media/1562/download>

three percentage points (from 15 percent to 18 per cent) approximately a year after entry into the Scheme. This seems to suggest there is limited effectiveness of the SLES program to date and indicates that specific evaluation work is greatly needed to explore this further.

While young people with disability are clearly scattered across a variety of employment programs, it is difficult to determine from public data where exactly young people with disability are and if the programs they are in are supporting them to achieve employment outcomes. For example, jobactive caseload data, which represents a variety of Australia-wide programs, lacks any detail around young people with disability. Considering how influential early experiences in the labour market are for longer-term employment outcomes, significant improvement is required for data collection processes – to support researchers and policymakers, and to ensure current gaps can be clearly identified in order to be addressed by governments.

Employees with disability are discriminated against in industry awards

People with disability are currently not entitled to the same minimum wage protections as other Australian employees. Under the Supported Wage System (SWS), employees with disability in open employment⁴⁰ can be paid a proportion of minimum wage based on their ability to work at ‘full productive capacity’. So if an individual is assessed at being 70 per cent productive capacity, their employer can pay them 70 per cent pro rata of the minimum wage as per the relevant industrial award or agreement.⁴¹

The SWS is also used as a wage assessment tool in the *Supported Employment Services Award 2020*, an industrial instrument used to set minimum wages and conditions of employees of Australian Disability Enterprises (ADEs). The SWS allows employers to pay employees with disability as little as \$89 per week (\$2.34 per hour for full-time employees), or 12.5 per cent of the minimum wage for those employees in ADEs covered by the *Supported Employment Services Award 2020*.⁴²

In its submission to the Disability Royal Commission, the Australian Human Rights Commission outlined concerns that the pro-rata assessment tool is discriminatory and contravenes several human rights under the International Covenant on Economic, Social and Cultural Rights and the Convention on the Rights of Persons with Disabilities (CRPD) – namely, Australia’s obligations to ensure fair wages, equal remuneration for work of equal value, and that people with disability can fully and effectively participate in society.

The Australian Human Rights Commission also detailed concerns about the limited data and oversight of the SWS. This includes:

- The number of people under the system
- Their average wage
- How the SWS impacts the standard of living of people with disability

⁴⁰ Employment not of a segregated nature

⁴¹ Australian Human Rights Commission. (2020). *People with Disability and Employment: Submission to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability*. Available at [ahrc_drc_employment_submission2020.pdf \(humanrights.gov.au\)](https://www.humanrights.gov.au/ahrc-drc-employment-submission2020.pdf)

⁴² *ibid.*

- The proportion of employees who transition from receiving a pro-rate age to a full wage.

While data about the use of SWS in general is unclear, there is some data available to gauge the conditions of employees in ADEs, otherwise known as ‘sheltered’ employment. This type of employment segregates people with disability from the open labour market. CYDA hears from our community that this segregated employment is often presented to young people as the best or only option for them, particularly for those who were educated through the special school system. In 2017, the average hourly rate paid to employees in sheltered workshops was \$5.61 an hour.⁴³

The type of employment and roles in ADEs generally do not offer people with disability the ability to develop transferable skills that could lead to open employment or a full wage.⁴⁴ In 2014, less than one per cent of people with disability in ADEs moved into open employment.⁴⁵

Inclusion Australia has done important work to highlight the experiences of employees of ADEs in their evidence provided to the Disability Royal Commission in 2020.⁴⁶ In the submission self-advocates described their perspective on ADEs and sheltered employment, how they want more opportunities to break into open employment, and more support to move to other jobs once they gained open employment.

Regardless of how many hours they may be employed or if their employment is ongoing, if wages are below minimum wage, people with disability do not have equal rights or secure employment, and they will not be able to experience financial security. This is especially apparent when the types of roles offered under ADEs almost never lead to full time wages – this ultimately entrenches the person in less than minimum wages for their working life.

⁴³ Women with Disabilities Australia. (2020). *WWDA response to employment issues paper*. Available at <https://wwda.org.au/wp-content/uploads/2020/08/WWDA-Response-to-Employment-Issues-Paper-Final1.pdf>

⁴⁴ Smith, P., Rhodes, P., Pavlidis, L., Alexander, J., & McVilly, K. R. (2019). Transitioning Australian Disability Enterprises to open employment community hubs using the Australian legislative framework. *Journal of Vocational Rehabilitation*, 50(3), 263–271. <https://doi.org/10.3233/JVR-191006>

⁴⁵ Australian Human Rights Commission. (2016). *Willing to Work: National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability*. Available at <https://humanrights.gov.au/our-work/disability-rights/publications/willing-work-national-inquiry-employment-discrimination>

⁴⁶ Relevant sections of Inclusion Australia’s Omnibus Submission to the Disability Royal Commission are available here: [EXHIBIT 9-004.06 - EXP.0058.0001.0019 - Inclusion Australia, Omnibus Submission \(Compilation of sections relevant to Employment Issues Paper\) | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#).

Rebecca's story highlights the neglect and exploitation young people with disability experience in the workforce and the inadequacies of existing employment programs.

To help reach her goal of finding open employment, Sydney student Rebecca* enrolled in a two-year School Leaver Employment Supports (SLES) program after completing Year 12.

Rebecca, who has Prader-Willi Syndrome and an intellectual disability, enjoyed building skills in floristry through work experience in the program's second year. The provider, also a Disability Employment Service (DES), found her a job with a florist before the program ended.

"Everything was so rushed; we were so excited," says Rebecca's mother Penny*, noting that Rebecca was not interviewed for the role and she did not have a job description.

Unfortunately, the job was not the opportunity Rebecca had hoped for. She experienced unpaid overtime, underpaid wages and insufficient breaks, as well as the onset of health challenges that the family believes were triggered by the work environment.

Penny says the DES provider discriminated against Rebecca throughout her employment by failing to put in place the support and standards of care given to her peers, denying her an equal opportunity to fully participate and succeed in the workplace.

"They were making false claims that they were supporting Rebecca and they weren't.

"They were supporting others. I know that. Rebecca knows that.

"It's discriminating against somebody from a non-English background who doesn't know what her rights are and what to ask for. That's your job as a provider – to put that in place.

"The duty of care failed."

There was no pre-employment medical assessment to gauge Rebecca's capacity to do the job safely, nor was an individual health and safety plan put in place.

Penny says safety should have been the first priority.

"Why wasn't this done?"

Rebecca tells how her tasks involved going into a cool room, sometimes in a shirt wet from changing water buckets, with the door closed.

"They [the employer] said that saved money," she says.

"Because they have to pay for the [power] usage."

Penny was shocked to learn Rebecca had been doing this, because people with Prader-Willi Syndrome have poor body temperature regulation. She believes this led to the development of a respiratory condition that makes everyday activities a challenge, as Rebecca now struggles with difficulty breathing.

"Even the employer said, 'Why are you coughing?'" Penny says.

"I couldn't stop coughing," Rebecca adds.

Rebecca's 6.5-hour shift at the florist was to end at 4pm but Penny says the employer was "adamant" she had to finish tasks before going home. This meant Rebecca "quite often" had to stay back without pay.

Penny raised this with the DES provider, as well as the lack of proper breaks, the fact Rebecca was being paid in cash, and that her wages were underpaid.

"It was about two or three dollars, but they all add up," Penny says.

"They said, 'Oh, it's not our job to check the pays, we don't have a payroll staff'."

The employers came from the same cultural background as the family and this had given Penny comfort that Rebecca would be in a safe environment. However, they spoke very little English, which made communication challenging, and tension built when the DES provider contacted the business to follow up on Penny's feedback.

"[The service provider] had rung them at nine o'clock in the morning when they started a busy day and they didn't like it," Penny says.

At one point, she says, the employers told Rebecca "if your mum complains again and again, don't come back to work".

Rebecca left the floristry job when the supported wage funding her employer received ran out. She was told they would keep her on at a wage of only five dollars an hour because she couldn't do the same work as another employee.

"I can," Rebecca says.

"They [wouldn't] let me."

"Because she didn't see my resume, she just assumed I couldn't do it."

Rebecca feels very poorly treated by both the employer and the DES provider.

"There is no dignity or respect [shown] in Rebecca's case; it is appalling," Penny says.

"She's been bullied, she's been humiliated and discriminated against, and it's not right."

However, the family feels the employer is less to blame because they didn't have the same understanding of Rebecca's disability as the DES provider.

Penny says the provider failed to put in place any "reasonable and necessary" adjustments to support Rebecca in the workplace.

She herself suggested a simple measure to help Rebecca change water buckets, after hearing the employer tell Rebecca it was a "waste of time" having her do it.

"I shouldn't need to improvise that," Penny says.

The DES provider sent a job coach but Rebecca says the employer wasn't happy with the training provided as "they weren't showing me the right way of doing the [tasks]".

Another job coach came at the end of a shift, Penny says, to ask Rebecca “to tick the boxes” on a worker consent form, which included questions like “do you need work health and safety, and are you getting along with your peers”.

“It was to make sure they were meeting targets, but they weren’t,” Penny says.

“Rebecca doesn’t even know what she was signing for.

“It’s useless. What’s the point? What is the point having the supports and funding?

“You can’t just poke your head in and make assumptions that a person with disability is okay. You can’t just tick a box because my daughter is not just ‘ticking the box’. She’s a human and she has feelings.”

***Names have been changed**

Appendix A: Australian Federation of Disability Organisations' *Eight Key Principles for a Sustainable Disability Support Pension*

1. All persons have a human right to social security and social protection. The right to social security is also a core right of national citizenship in Australia that has long been embedded in legislation and government policy (e.g., Invalid and Old-aged Pension Act, 1908).
2. The right to social security and social protection does not deny the right to work for persons with impairment/s and/or chronic condition/s but recognises that across the life course, persons with disability will require differing levels of socio-economic support to account for changes in personal circumstances and in the labour market.
3. Persons with disability who are unable to work, or are limited in their capacity to work due to impairment, have a right to social protection and economic security (CRPD Art. 28). Mainstream unemployment benefits and income support payments are inappropriate and not fit for purpose as social security payments for persons with disability.
4. The assessment of disability social security eligibility needs to be fair, reasonable, and based upon an objective measure of need to ensure it is first, responsive to the individual and their circumstances, and second, does not generate hardship or greater economic insecurity.
5. Disability social security assessment processes should be undertaken by relevant medical and allied health professionals who have the required expertise in relation to the individual's impairment/s and chronic condition/s alongside the everyday impacts the impairment/s and/or chronic condition/s have over a period of time and the impacts of social barriers like stigma, discrimination and inaccessibility of the labour market.
6. Personal information and evidence provided by the assessing medical and allied health professionals, and the individual concerned, remains protected under national privacy legislation and cannot be shared nor drawn upon without the explicit permission of the individual concerned (CRPD Art. 22).
7. Disability social security assessment processes, procedures and outcomes must be freely and readily available and distributed widely in inclusive accessible formats and languages to ensure that all persons with disabilities, their support networks and medical and allied health professional support networks are fully informed (CRPD Art 21).
8. Responsible government department/s should publish regular and comprehensive de-identified data documenting the core demographic information of recipients alongside changes to regulations and guidelines to enable, first, the monitoring of impact of such changes, and second, to ensure that persons with disabilities and/or chronic conditions, medical and allied health professionals, and relevant organisations are fully informed at all times (CRPD Art 31). These data should be in a form that allows for secondary analysis by independent parties.