



14 November 2023

Submission re: Disability Employment Services (DES) Quality Ratings Feedback

Introduction

Inclusion Australia is the national Disability Representative Organisation representing the rights and interests of Australians with an intellectual disability and their families. Founded in 1954, our mission is to work to make sure people with an intellectual disability have the same opportunities as people without disability. We have state members in New South Wales, Queensland, South Australia, Tasmania, Victoria and Western Australia.

For the past two years we have had a Northern Territory branch based in Darwin. Our work in the Northern Territory is informed by a Local Steering Group that includes representatives from advocacy and other territory-based organisations.

We thank the Department of Social Services (DSS) for the opportunity to provide feedback on the proposed DES Quality Ratings. We have previously made a [submission responding to the draft DES Quality Framework](#), which we reference below. We would welcome any opportunity to consult further on the issues raised in this submission or to discuss opportunities to engage people with an intellectual disability inclusively in this development process.

Accessibility of the Quality Framework and consultation processes

As we noted in our previous submission, the draft Quality Framework released earlier this year was not accessible to people with an intellectual disability, which limited opportunities for our community to provide feedback. We requested in that submission that the final Quality Framework be released in Easy Read, but this has not yet happened since it was published in July this year. This restricts the ability of DES participants and prospective participants with an intellectual disability to consider their service provider's quality markers and how their provider is performing and prevents their engagement with the broader Quality Framework consultation and implementation processes.

The current paper on DES Quality Ratings and Implementation Questions is also not accessible to people with an intellectual disability. Our community therefore has had very limited opportunity to engage meaningfully with this part of the consultation process. As such, it is unclear whether the Quality Framework, including the proposed Quality Ratings system, has been genuinely informed by those who use DES and rely on receiving high-quality services.

Providing Easy Read materials in future consultations is a crucial part of ensuring the voices and expertise of people with an intellectual disability are included in consultation processes.

Co-design with people with an intellectual disability who have and do use DES will be a critical part of developing a DES system that is fit-for-purpose and can appropriately meet participants' needs. We welcome any further conversations with the Department about how this could best be achieved going forward.

Our previous work on DES reform

In response to the number of reforms that have been planned or undertaken for the DES program in recent years, Inclusion Australia and our members have consulted widely to gather the experience, expertise, and evidence from people with an intellectual disability and their families, as well as researchers, advocates, and other experts.

This has culminated in three recent major submissions, which form the background to this submission:

- [What Works: Making Disability Employment Services \(DES\) work for people with an intellectual disability, December 2021](#)
- [DES Reform Submission, February 2022](#)
- [DES Draft Quality Framework, March 2023](#)

As the evidence in these submissions demonstrates, DES is failing people with an intellectual disability. In its current form, DES presents significant barriers to people with an intellectual disability to open, inclusive, and equitable employment, including the:

- Exclusionary entry threshold to accessing DES
- Lack of evidence-based supports
- Lack of ongoing support funding
- System complexity
- Lack of training to build the capacity of employers and employment service providers.

As a result, fewer than 10,000 people (3.1% of the DES caseload) supported by DES are people with an intellectual disability.¹ This is one of the reasons why it is critical to ensure their experiences are captured in any consultation or reform processes—the current DES program does not work for people with an intellectual disability so many are missing out or receiving poor quality service. Any redesign or reform of the program must consider the needs of this community.

As we argued in our submission earlier this year on the Draft Quality Framework, it is imperative that all aspects of ensuring quality in DES embed principles of evidence-based practice to support the dismantling of these barriers and implement the recommendations outlined in the submissions

¹ Labour Market Information Portal DES Data 30 November 2021.

mentioned above. The experience and expertise of people who use or would intend to use DES services must be at the centre of any Quality Framework and Quality Ratings system.

Feedback on the DES Quality Ratings proposal

The discussion paper released as part of the consultation in February 2023 about the draft Quality Framework stated that the new Quality Framework is being developed to “ensure the views of DES participants are embedded in the ratings system.”²

However, our view is that the proposed Quality Ratings system has not met this goal and is, in its current form, not fit for purpose.

There are three main reasons for this:

- Both the Quality Framework and Quality Ratings development processes have not sufficiently prioritised DES participants—and especially the potential DES participants with an intellectual disability who are currently shut out of the system (and the recent consultation opportunities) because of the barriers mentioned above.
- The proposed Quality Ratings system is relative, not absolute: it tells people how providers are performing relative to each other, but this is not a quality indicator itself. Relative quality is a difficult concept to understand and can be misleading. For example, if the majority of providers are low quality, then the overall standard of quality will be lower: a moderate quality provider would therefore score higher based on the overall lower standard.
- The proposed Quality Ratings have a strong emphasis on Provider Self-Assessment to share information about the quality of service delivery to inform the Department’s assessment of the service. This does not sufficiently include participants’ assessment of services.

Therefore, we recommend the following changes to the Quality Ratings system:

- 1. Engage with people with an intellectual disability, and family members of those who have been, are, or would like to be DES participants to formulate a framework for quality that is informed by lived experience**
- 2. Redesign the Quality Ratings system to reduce complexity, including by removing the relative nature of the current ratings system in which providers are assessed according to each other’s performance quality**
- 3. Develop an accessible, inclusive mechanism for DES participants to assess the quality of the service they have received, and embed this in the Quality Ratings system.**

² Department of Social Services. (2023). *DES Quality Framework Discussion Paper*. p. 1.

We have long recommended to the Department that the DES system should prioritise and heavily weight the expertise, views and experiences of people using employment services when measuring program quality and outcomes. We have been working with the Department through its participant experience work to provide this input.

Earlier this year, we consulted with our Northern Territory branch, which includes people with an intellectual disability who have been DES participants, about what people with an intellectual disability want from their employment services. Our colleagues told us that the following were most important to them when accessing DES:

- Listening to what people with an intellectual disability want and not making assumptions
- Providing information about, and support for, making complaints and asking questions that is widely available and accessible
- Having the right supports at every stage of the process of getting and sustaining employment
- More education and training for DSS and DES providers about work readiness and how to support people with an intellectual disability in employment.

This could be seen as a starting point for understanding what DES participants are looking for from their service provider, and thus what information could be used to shape an accessible mechanism to capture participant's views about the aspects of quality that are most important to them. Further consultation with people with disability, including people with an intellectual disability, would need to be sought to develop this further.

We believe the Quality Ratings must do more to prioritise the views and experiences of people who use DES. The voices of people with an intellectual disability must be included and valued to ensure program quality, participant outcomes, and continual improvement. Capturing the views and experiences of participants in the Quality Ratings is essential to accurately and equitably assessing the quality of services, and ensuring the information about service quality is not over-reliant on Provider Self-Assessment.