



Victorian NDCO response to the '*Securing our Future Economic Prosperity*' discussion paper, June 2008.

The Victorian network of the National Disability Coordination Officer Program (NDCO) submits this response to the *Securing our future economic prosperity* discussion paper presented by the Victorian Government. The NDCO presents a specific focus to the considerations that will need to be addressed within the proposed reforms to ensure people with a disability in Victoria are not further disadvantaged and excluded from opportunities within Vocational Education and Training.

The National Disability Coordination Officer Program is a Department of Education Employment and Workplace Relations funded initiative which has as its primary goals the facilitation of:

- Improved transitions from school to post-school education and training and subsequent employment
- Increased participation by people with a disability in higher education, vocational education and training and employment
- Improved linkages between schools, TAFEs, Universities, training providers and disability services.

The NDCO program is actively promoting the benefits of successful engagement with Vocational Education and Training for people with a disability. A particular focus of the NDCO program is to raise awareness of the economic advantages that occur when people with a disability are provided the opportunity to access further education, training and subsequent employment. Research undertaken by Dr Mark Bagshaw in conjunction with Deakin University has highlighted the costs associated with non participation of people with a disability in education, training and employment to Australia. Australia currently spends 12 billion dollars on welfare payments for people with a disability. If people with a disability were able to successfully complete studies within vocational education and training and were offered opportunities to work, even at half the average rate and were only half as productive as the rest of the workforce, they would add 46 billion dollars to Australia's annual GDP (Bagshaw 2002).

Vocational Education and Training is a crucial pathway to securing employment for people with a disability. Only 46% of the 3.2 million Australians with disabilities are participating in the workforce. In Victoria only 12% of the workforce is people with a disability. (Human Rights Equal Opportunity Commission 2006).

People with a disability are one of the most excluded and stigmatized population groups in Australia. Limited opportunities for genuine full time, part time or casual employment exacerbate the disadvantage they already experience. "Many of these inequalities are preventable as they are not due to genetic or biological factors. Instead they are related to inequalities in access to the things we all need for good health, such as income, education and good living and work conditions" (Vic Health 2008). Mobilising this pool of talent will go a long way to solving Australia's skills shortage.

This submission provides a general overview of some of the considerations that will need to be addressed on behalf of prospective learners with a disability, when determining the construct of the reform to VET in Victoria.

**Written and presented by the
Victorian network of the National Disability Coordination Officer Program.**



Question 1: *If government supported training for all eligible Victorians were introduced, what should the eligibility criteria look like?*

The design of the eligibility criteria must take into account considerations that promote and encourage the take up of training within VET for people with a disability.

1.1 There is a clear need for the continued maintenance and Government support of pre-vocation programs that have been designed to engage people with a disability in VET. These programs are at lower certificate levels but are extremely important for people with a disability that have been long term disengaged. Their purpose is to:

- Reengage people with a disability with education
- Provide one to one careers guidance and vocational goal setting
- Familiarise and equip the learner to navigate the VET system independently or with support through specialist support staff such as Disability Liaison Officers.
- Facilitate transition through the pre-vocation program into mainstream study areas.

Well designed pre-vocation programs are purposeful and future goal oriented and have facilitated life change for many people with a disability. It is recommended that these programs continue to be funded directly to providers and are not incorporated in a system where students bear the cost.

It is also recommended that these programs provide a high level of accountability, and evidence that graduates are moving onto further study or meaningful community engagement.

DAVE

Dave was 15 when he went to TAFE to undertake an eight week Building Bridges pre-vocation program. Dave had been referred to the TAFE by his school which had deemed him as not having the learning capacity to undertake year 10 or higher studies.

During the eight week program at TAFE it was identified that Dave had indicators of a non-diagnosed learning disorder. The Disability Liaison Officer and other specialist staff from within the TAFE supported Dave through formal assessment where his learning disorder was confirmed. Dave was provided with alternate learning methods, such as speech to text and screen reading software. Dave prospered with the learning tools and successfully completed 3 television broadcasting modules as a component of the pre-vocation program.

Dave went on to complete a certificate 2 in information technology on a part time basis at the TAFE. Dave has secured ongoing full time employment in a warehouse. He has gone on to undertake further studies in warehousing. He is now buying his own home. Dave attributes his ability to succeed, to his opportunity to learn how to learn within the pre-vocation program at TAFE.

- 1.2 There must be consideration of the impact of disability with flexibility built into the eligibility criteria, enabling extended periods for completion of courses. Students experiencing disability are more likely to study part time, and often take up to twice as long to complete. One example of a flexible approach to facilitating success through learning is to provide the opportunity for a student to rehearse a study program, i.e. undertake a module non-assessed then undertake the same module assessed. This provides an opportunity to solidify the learning for students who suffer from disability or medical conditions that impact on fatigue levels, comprehension and concentration.

Naomi

Naomi has cerebral palsy; she has limited mobility and tires both physically and mentally very easily. Naomi has been studying a certificate 2 in Multimedia for two years. Naomi enrolls in each module twice, the first time through a non-assessed mode and the second to be assessed. In doing this Naomi is able to take the time to really understand her learning content and master the technical approaches required within her course. Naomi has successfully completed most modules in her program and is looking forward to doing desk top publishing from home for organisations in her local area. Naomi has already been able to pick up small projects for a local organisation designing business cards and brochures, as a result of her studies.

Naomi could easily be excluded from study if she was to accrue a debt for both times she enrolled, or if she was unable to enrol through a subsidised payment the second time because of the repeat nature of the study.

- 1.3 The importance of certificate one and two levels should not be underestimated for their pathway to higher level studies for people with a disability. Often a gentle introduction and progressive approach to certificate acquisition is essential to ensure successful completion and transition to higher level studies.
- 1.4 It is recommended that certificate one, two and three level programs are not a part of a deferred payment approach and that funding through the State direct to providers is maintained for these levels. This is imperative for people with a disability as well as many other long term disengaged groups. A flexible approach to progression through these levels is required for people who are also mastering learning techniques and strategies alongside the formal coursework. Students who begin accruing a deferred payment at Certificate One Two and Three may be deterred from participating at higher level studies if they have already accrued a substantial debt.
- 1.5 The eligibility criteria need to recognise and make allowances for prospective students with disabilities who are studying for reasons other than to obtain employment. There is an improved quality of life that occurs for students who study for personal reasons such as self-determination, social support, improving life skills, achieving greater integration in society, achieving a greater sense of self esteem and self worth and developing a curiosity for learning.

Question 2: How could this proposal be marketed to encourage higher take up, particularly among Victorians who have never considered VET studies?

- 2.1 The marketing approach encouraging take up of Vocational Education and Training must demonstrate a high expectation of engagement from people with a disability. Massie (2007) in his address to the Disability Equality Conference articulates clearly the need for public bodies including education providers to start from the assumption that people with a disability have something to contribute as learners, workers, volunteers, family members, politicians, entrepreneurs, artists, sportspeople etc. He states that “having an impairment or long-term health condition is a pretty common experience, yet governments and public authorities have regarded disabled people as so different, so special, they have often absolved them of the responsibilities that other citizens have – as workers, earners, parents, civic and political leaders”.

In protecting people, we institutionalise low expectations and dependency; we rob people of a voice and of the right to ask for more than the most basic minimum in terms of quality of life. Instead we should promote an expectation that people with a disability participate in the ordinary activities of life, and, with support where it is needed, to make the contribution they can.

Qualifications and subsequent employment is a crucial means by which people affirm their identity, achieve financial independence and access learning and life experiences. One of the most important aspirations of people with a disability is the opportunity to work (Department Premier and Cabinet Victoria Government 2008). Participation in the labour market is also a critical influence on economic growth and the economic fortunes of a society, hence the economic fortunes of individuals, and how equitable a society is.

There are a number of reasons why people with a disability are being overlooked as potential and valued employees within the mainstream workforce, these include:

- Misconceptions and misplaced fears about cost, risk and impact on the workplace by employers.
- Low expectations of people with a disability from the broader community, and prospective employers.
- A lack of awareness of the government assistance and compensation available to employers
- Low exposure within the workplace of people with a disability (Allen Consulting Group 2005; Komp 2006).

Maurice

Maurice is 50 years old. When Maurice was 26 he was involved in a serious motor bike accident which left him with a brain injury. Maurice lost his business and over half a million dollars in assets. He and his wife were told that Maurice would not work again and that he would always appear to have Alzheimer's. Case management agencies did not encourage community participation and Maurice led a very sheltered life for many years, rarely venturing from home. The family survived on a disability pension and the part time income of Maurice's wife who was also his carer. Several years ago Maurice was enticed by a TAFE teacher to take on part time study in a Certificate 1 information technology course. Maurice discovered through this course that he was able to learn and retain information if he applied himself and repeated the learning consistently. Maurice continued his studies and completed a certificate 2 in information technology. His ability to participate in learning and the enjoyment he experienced socialising with fellow students impacted on his personal well being. He began moving out into the community, he joined a bowls club, he later joined a shooting club. Maurice is now a state level pistol shooter, a zone level lawn bowls competitor and he has secured full time employment at a local council as a workshop foreman. Maurice's wife explains that the experience at TAFE changed the whole family's world, improving the quality of life for not only Maurice but herself and the children. Maurice has recently secured a loan to purchase a home. His wife is now working at the TAFE where Maurice studied. She is emphatic that she is giving back to the TAFE as much as she can because of what her family gained through Maurice engaging in learning.

- 2.2 The move to create a more competitive approach to Vocational Education and Training must also consider the exclusionary risks that could arise for prospective learners with a disability if the VET providers are not equipped to adequately accommodate them. It is imperative that providers have the infrastructure to comply with current legislation such as the Disability Discrimination Act (1992) and the Disability Standards in Education (2005).

The standards and their guidelines have assisted VET providers to implement inclusive strategies and address barriers for people with a disability. A performance requirement of TAFEs within Victoria has been the development of a Disability Action Plan that is lodged with the Human Rights Equal Opportunity commission.

These plans demand progressive actions on removing barriers and facilitating access for learners with a disability. This approach must be sustained and strongly promoted by the State in response to the responsibilities of complying with Commonwealth legislation that applies to all education providers.

Evidence of compliance with legislation and a demonstrated capacity to provide support services for learners with a disability are measures to be built into funding arrangements with individual providers of VET.

- 2.3 Any marketing approach that will encourage more people with disabilities to participate in VET needs to be explicit in making available support to people with disabilities, allowing them to progress through their study of choice with targeted support as required. Organisations that provide targeted support processes that facilitate success in learning for people with a disability need to be recognised, promoted and financially rewarded for their compliance with legislation and their commitment to social justice.
- 2.4 There is a significant body of sociological literature that suggests that decisions about long term engagement with education and training are made at an early age, with choices that result in a disengagement, limiting future choices. With this in mind – marketing strategies should also be focused at early secondary students with a view that there will be a long lag time between the implementation of a communication and marketing strategy to meaningful take up of VET studies. Targeting people who have already committed to life choices impacting on education are likely to effectively reach only those for whom it is already a viable option.

Question 3: *What proportion of course costs do you think is reasonable for an individual or business to contribute?*

- 3.1 The experience with HECS is that there is little evidence to suggest that it acts as a deterrent to engagement in higher education. On that basis proportioning costs to individuals, businesses and the state may be appropriate as they will all be the key beneficiaries of the training. There will also need to be some consideration applied for prospective students who receive current fee concessions within VET as a result of pensioner status. If the current concession to fees is totally abolished, people with a disability will in fact be disadvantaged through the revised fee structure. It is recommended that the proportion of costs recognises the recipients of centrelink pensioner benefits with a lower portion attributed to individuals with valid concession cards and in this instance a higher proportion to the State.

The argument by the State for the HECS approach is that it will alleviate up front costs to students within VET. If this is the case, and upfront administration and amenities fees are not to be an added burden to students, considerations for financial support to providers for specialist disability assistance similar to the model utilised within the Higher education sector may need to be considered. This could result in a return to the funding model DSF "Disability Support Funds". Within the University sector the costs of supporting a learner with a disability are almost fully covered through the Department of Education Employment and Workplace relations through twice yearly submissions based on funds expended. This includes the costs of purchasing equipment over \$500.00 for students with a disability.

Question 4: *Is it reasonable to introduce higher fees for students for training courses that deliver higher individual benefits?*

- 4.1 It is recommended that there are fee incentives for recognised areas of skill shortages regardless of earning capacity on completion of training.
- 4.2 It is recommended that the fee structure reflect the costs of instruction as well as employment benefits.
- 4.3 It is important that learners with a disability are provided special consideration for extended completion times and are not penalised through additional fees that may be incurred.

Question 5: *Should the Government consider an income contingent loan scheme as currently applies to university education?*

- 5.1 The introduction of an income contingent loan scheme needs to take into account the investment potential of participants. University qualifications exceed VET qualifications in level of status and recognition in many industry areas. For example; a university qualified engineer in contrast to a certificate 4 manufacturing and design qualification within the same industry would expect higher retribution for their investment. The fee schedule will need to reflect the level of the qualification and the anticipated return on employment.
- 5.2 The income contingent loan scheme should not apply to courses below Certificate 4 level. As mentioned earlier, some people with a disability will require a graduated study program, accessing pathways from certificate one upward, they should not be disadvantaged through an accrued debt. Other people with a disability will not need a graduated approach and will begin their studies at higher levels. These students may require accommodations from the provider such as removal of environmental barriers, availability of accessible materials, access to specialist equipment and/or alternate formatting. Appropriate management of accommodations by the education provider should result in equitable access and participation for people with a disability. The more disability is seen as a mainstream issue, the more likely that disability will become less of a barrier to full and equitable participation in the labour market and broader society. Participation of people with a disability at Certificate 4 and higher needs to be encouraged with genuine expectations for success.

Question 6: *How can the system be structured to produce a better match between the future needs of the Victorian economy and the training choices made by individuals and businesses?*

- 6.1 The Victorian VET system has a role to play in raising awareness with employers, the Victorian Skills Commission and Industry Training Advisory Bodies (ITABs) of the untapped employment potential of people with a disability.

19% of Australians of working age (15 – 65 yrs) have a disability. Providing a work environment which attracts applicants with disability and supports the career aspirations of successful applicants makes good business sense. It allows agencies to tap a pool of increasingly qualified applicants and encourages a supportive and flexible workplace that is attractive to all applicants yet compared to other applicants with the same educational qualifications, people with disability are commonly disadvantaged through the recruitment process; employer perceptions of their ability; and a lack of relevant work experience (Australian Public Service Division 2006).

For many people with a disability the inability to find rewarding work is not related to their abilities. They may be able to perform a wide range of tasks and duties or be qualified to fill job vacancies. Reluctance of some employers to use this workforce has left many people reliant on pensions when they could have made valuable contributions to society as workers and taxpayers (NSW Government 2008).

People with a disability that have completed their studies have done so through demonstrating an ability to meet the inherent requirements and mandatory competencies of the training program. There is no organisation better placed than the training provider to create awareness with prospective employers of how any barriers to attaining competency were overcome within the training environment and how these same accommodations could transfer to the workplace.

6.2 It is essential that the training environment model genuine employment outcomes for learners with a disability. It is strongly recommended that State funded VET providers are required to demonstrate a commitment to developing and implementing a workforce planning process that articulates strategies for recruiting and maintaining employees with a disability. Research shows that workers with a disability have:

- Productivity that is equal to or better than their non-disabled counterparts
- Fewer workplace accidents
- Superior attendance rates
- Increased retention in employment
- A positive impact on workplace morale (Diversity Council Australia 2005).

University of Western Australia

In 2001, the University of Western Australia (UWA) implemented the Workforce Diversity Strategy demonstrating its strong commitment to equal opportunity and workforce diversity. Particular emphasis was placed on the recruitment of people with disability. The strategy was viewed as an opportunity for the UWA to demonstrate real leadership. Since 2001, 54 staff with a disability have been recruited for positions including business administration, traineeships, supported teams, security officers, information technology, clerical and data entry and library officers. The Director of Human Resources at UWA reports positive feedback for the recruitment of people with a disability with faculties reporting that people with a disability have added value to the workplace through offering a different perspective, sharing their experience and providing inclusive services to students.

- 6.3 Disability, medical conditions, mental health and learning difficulties are also hidden conditions that impact on people within the workforce, their impact can result in limited opportunities for professional advancement of individuals. Training providers have an educative role to industry to ensure workplace training is designed through an inclusive teaching and learning model. An inclusive approach takes into account possible barriers for employees with hidden difficulties that may result in their exclusion from workplace opportunities. In removing barriers to workplace training, employee's that may have been previously overlooked within their organisation can become better equipped to meet specialist skills shortages. The role of VET in capacity building industry through the provision of inclusive teaching and learning work based programs needs to be recognised and promoted within the Skills reform.

Workplace Training

A regional TAFE was contracted to provide a certificate level program to current employees within a local industry. The employer made it clear that all staff within a specialist area of the organisation must complete the training as a result of changes to industry requirements. The trainer had met with employees to explain the training and assessment associated with the certificate. He had gathered a broad profile on the employee group, some of whom were from non English speaking background. There were also employees identified as early school leavers that had been with the organisation long term, some up to 30 years. The trainer found it difficult to engage all employees in the training, even though by not participating they were placing their ongoing employment at risk. After consultation with specialist staff at the TAFE it was decided that some accommodations to the presentation of the learning resource and the assessment process would be made. To eliminate barriers for employees that may have difficulty with reading and writing because of language barriers or learning difficulties, materials were provided in both print and audio format. The trainer called a meeting of all employees that were required to undertake the course. Without mentioning difficulties with reading and writing he instead acknowledged difficulties with finding time to work through a resource book, explaining that some learners prefer audio format as it means they can listen while doing other things. He also explained that participants had the choice of a written or oral assessment. He had 100% take up of the program, with several participants later confiding to him that they were very anxious about having to do the certificate as they had difficulties with reading and writing and they had not disclosed these difficulties to their employer.

For the system to be effective within a changing economy and growing corporate environment, certain responses need to be inclusive of the needs of the wider society. In doing so, the business environment not only takes advantage of newly skilled Australians, but is also more receptive and reflective of their customer base.

It is also recommended that:

- 6.4 There is wider promotion of training programs including compatibility of training to employment, linking skills shortages to employment outcomes.
- 6.5 There is targeted marketing of TAFE/VET programs to individuals with disabilities – raising awareness to training providers and to employers of the capabilities of people with disabilities.
- 6.6 Retraining opportunities and government incentives to older Australians who acquire a disability and require alternative skills to re enter the workforce are supported through VET.
- 6.7 Strategies need to be initiated to improve the capacity of public training providers, providing access to up to date training facilities including technical industry equipment to ensure graduates have a competitive edge when seeking employment outcomes. An improved match with training and industry expectations needs to be maintained to ensure that providers are not feeding students through courses without adequate knowledge and skills. This needs to be regulated and monitored to ensure students are receiving value for money.
- 6.8 Training pathways need to be further established allowing for transition from one training level to the next and encouraging transition from one provider to another. Compatibility for students with disabilities in matching two courses at the same Certificate level also needs to be allowed to ensure students with disabilities are not further prohibited from the work force.
- 6.9 Skills Victoria has a role to play in equalising opportunities and access to resources and incentives that are available to graduates and apprentices with disabilities across government departments. There are distinct disadvantages for graduate/apprentices that have a goal of becoming self-employed. While there is access to schemes for employers of people with disabilities a person with a disability with a goal of becoming self-employed has limited access to resources to establish a modified work environment.

John

John is wishing to undertake a Certificate IV in Audio Engineering. His career goal is to become self employed recording demo CDs for new bands and recording radio drama productions for community radio stations. John has a vision impairment. He does not believe that he will be able to become self-employed as he will not be able to access Workplace Modifications funding to purchase JAWS screen reading software at \$2,000 and a portable talking scanner at \$3,400 to make his work setting accessible to him. If John was employed through an employer, these resources would be available.

Question 7: How can Government best support TAFE and ACFE providers to thrive in a more competitive environment?

- 7.1 Determining one arm of the adult education sector as a preferred provider for foundation studies targeting long term disengaged people could result in a segregated approach to adult education for people with disabilities.

People with a disability can easily become caught up and recycled in a low expectancy and low attainment approach. Organisations that are funded to specialise in providing training at the foundation levels for people with a disability must also provide and demonstrate clear pathways for transition to higher level studies within same or alternate training organisations.

Articulated pathways and relationships between ACFE and TAFE providers will be essential to ensuring people with disabilities are able to transition through to training that will lead to meaningful employment.

- 7.2 Providers offering competitive fee pricing structures will need to be monitored for their ability to provide the additional services that are required by some people with a disability. Full service providers could in the short term be disadvantaged by competitive pricing; in the long term it will be students with additional learning needs that are not adequately accommodated within a 'cheaper' option.
- 7.3 It is imperative that training providers not only deliver course content but also provide an opportunity for people who have historically been disadvantaged in education to learn how to learn through flexible and inclusive teaching and learning strategies. This means, providers must also have a culture of fostering an inclusive learning culture with trainers equipped to recognise and remove barriers to learning within their curriculum development processes.
- 7.4 Full service providers need to be financially subsidised for the additional supports they provide to marginalised and disadvantaged learners.
- 7.5 Providers that aim to offer specialist support to students with a disability may require seed funding to purchase adaptive technology undertake environment modifications and employ specialist support staff.

Question 8: How can government make its support for students undertaking training available in a way that encourages training providers to be more innovative, flexible and responsive to the needs of individuals and businesses?

- 8.1 The VET sector has been fragmented in its approach to understanding inclusive and flexible teaching and learning approaches and managing a diverse student group.

A coordinated State wide approach to skilling up the workforce across VET and ACFE is required. While the certificate 1V Trainer and Assessor teacher qualification now has as an elective module 'Foster and Promote an Inclusive Learning Culture', the understanding of and delivery with this module differs broadly across organisations. A targeted professional development program is required to ensure all teachers whether sessional, casual, part-time or ongoing are supported to develop the knowledge and skills required to offer genuinely inclusive learning opportunities for all students.

- 8.2 Minimum standards and guidelines for accessible and inclusive course design and delivery are required as a benchmark for trainers within VET and ACFE, responses to these standards could be recognised within Disability Action plans or individual organisations.
- 8.3 There needs to be a stream lined approach to navigating traineeships and apprenticeships for people with a disability. Apprentices with disabilities are often not aware of specialist funds or supports available to them to support their completion of the tuition based component of the study program. National Apprenticeship centres are not always consistent in their approaches with advising training providers of apprentices with additional learning needs, which results in lost opportunities for the apprentice. The current model is dependent on the apprenticeship centre making the training provider aware of any additional support that may be required, this is not effectual. The training provider requires a process for identifying learning difficulties as a result of disability and of tendering directly to the Disability Apprenticeship Wage Scheme to secure adequate support funds for the apprentice.

Mary

Mary has a physical disability and is seeking a traineeship in Business Administration. When approaching employers she is told to first find a training body and when approaching a training body she is told to find an employer who can make reasonable adjustments to the work place. Following no success through the above options, she then approaches a Disability Employment Network who refers her to the local TAFE who refers her to a Job Network. She then gets referred to a Group Training organisation who says that they do not have the skills required to cater for her disability. After 6 months of trying to connect with organisations that do not see her needs as their primary business, Mary fails to gain a traineeship and becomes disengaged. She cannot find unskilled work and is not successful in gaining open employment as she has no experience.

Question 9: *In what ways can Government help individuals and businesses better understand and access the benefits of vocational education and training?*

9.1 Vocational Education and Training can and should be active players in the promotion of graduates with a disability as productive employees. Studies show a range of positive impacts from disabled people's participation in the workforce:

- 98 per cent of staff with a disability rated average or better in work safety;
- 90 per cent of people with disabilities rated average or better on job Performance;
- 86 per cent of people with disabilities rated average or better on attendance;
- 90 per cent of employers had no change in their insurance costs to employ people with a disability; and
- almost all employers with disabled employees reported a distinct positive effect on staff morale (Komp 2006).

There are a number of approaches that can be implemented through the Vocational Education and Training system. Creating direct partnerships with employment services to promote and market graduates is one essential component of the untapped potential of VET. For example:

- Creating an expected employment outcome for specific programs i.e. the two year Work Education course.
This course is designed to assist young people with a disability who are exiting either mainstream or specialist schools to prepare for the world of work. Students participate in numerous work placements throughout the two years. Strategic planning and deliberate partnerships with Disability Employment Networks could assist the development of career targeted placements or traineeships for these students.

This is not an expectation of the program at the moment, while some students do gain employment it is almost incidental to the course and not a deliberate strategy.

9.2 The current movement with targeted Disability support within Vocational Education and Training is to wherever possible promote learning support strategies that assist the individual to develop skills for independent learning. These strategies are transferrable and move with the learner to employment. There is a need for community and workplace promotion of the learning strategies, tools and technologies available to remove workplace barriers for people with a disability. These approaches are embedded in the education sector but are not as recognised within community or industry. Promotion of graduates with a disability must also incorporate education for employers in the area of simple accommodations that can be afforded and implemented through the workplace modifications scheme.

Jack

Jack is a quadriplegic. As a school leaver he began studies in business with no awareness of the technologies that could promote his independence in learning. He assumed he would need a note-taker in class to assist him and an assistant to type up his work. While Jack had strong work aspirations he didn't truly believe he would gain employment as he felt he would be viewed by prospective employers as having high and expensive dependency needs. Through the Disability Officer Jack was introduced to adaptive technologies. He learnt to use speech to text software. He was introduced to a modified telephone that he could activate through hands free technology. Jack was also encouraged to use a voice activated digital recorder in classes that he could later listen to for learning reinforcement. Jack completed his studies and in the process developed strategies to become an independent learner. When applying for employment Jack was able to demonstrate how he would be an independent employee within the organisation with minor workplace modifications. Jack is now the Manager of a Disability Service and also teaches part time in the Certificate 1V Community Services Disability course with the local TAFE.

- 9.3 Employers and VET providers must have available to them awareness of the flexible arrangements that can be implemented for workplace or onsite learners with a disability. In doing this it is essential that the legislative requirements for 'reasonable adjustments' are recognised within the structure of the system and its funding approach.

Reasonable adjustments vary according to specific disability needs and can include extended time, provision of inclusive technologies, physical support, modified learning environments, alternate formatting of learning materials, purchase of specific equipment etc.

The model for funding with VET must apply considerations for people with a disability that do not disadvantage or exclude them. If VET providers do not receive targeted equity funds to assist in providing the disability service, there is a very real risk that people with a disability will be excluded from the take up of Vocational Education and Training through a selecting out process based on perceived additional needs and costs. While this is a direct breach of legislation there is genuine risk of these practices occurring where costs associated with accommodating people with a disability are viewed as not viable by the provider.

- 9.4 It is important that individuals and business are able to engage in learning programs that will further capacity build or compliment current skills within the workplace. These additional skills and knowledge are not always at a higher level, if the funding model for VET mirrors the HECS approach there may be disincentive through the need to be direct fee paying for a course at the same or lower level as current qualifications. This would directly disadvantage and perhaps exclude people with a disability as it is common for learners with a disability to add on to their skills at the same level to advance their employability status.

Sally

Sally is hearing impaired and has a Certificate IV in Disability, and a Bachelor of Arts. Sally works as a Case Manager in a Disability Employment Network. Her career goal is to obtain a management position within Disability Employment Services. To do this Sally needs to complete as a minimum a Certificate IV in Frontline Management. If the new VET funding guidelines model off the HECS approach, Sally may not be eligible for a funded place in this course as she already has qualifications at the same and higher levels. Sally would not be able to finance a fee paying position in the management course. Her ability to advance in her career will be limited as a result.

Key Recommendations

1. The marketing approach encouraging take up of Vocational Education and Training must demonstrate a high expectation of engagement from people with a disability.
2. Evidence of compliance with current legislation such as the Disability Discrimination Act (1992) and the Disability Standards in Education (2005) and a demonstrated capacity to provide support services for learners with a disability are measures to be built into funding arrangements with individual providers of VET.
3. A flexible approach to progression through qualification levels is required for people who are also mastering learning techniques and strategies alongside the formal coursework.
4. Students who need to repeat modules within a course as a result of impact of disability should not be penalised with additional tuition costs.
5. Consideration must be applied to tuition costs for prospective students who would receive fee concessions within the current VET funding arrangement as a result of pensioner status.
6. A return to the targeted financial support to providers for specialist disability support similar to the model utilised within the Higher education sector will provide a clear picture of demand for academic support and associated costs for learners with a disability.
7. Upfront administration and amenities fees on top of an accrued tuition debt should not be an added burden to students.
8. Precautionary and preventative measures must be built into the skills reform agenda to remove the risk of VET providers selecting out/excluding people with a disability based on perceived additional needs and associated costs.
9. Vocational Education and Training can and should be active players in the promotion of graduates with a disability as productive employees.
10. The Victorian VET system has a role to play in raising awareness with employers, the Victorian Skills Commission and Industry Training Advisory Bodies (ITABs) of the untapped employment potential of people with a disability.
11. It is recommended that State funded VET providers are required to demonstrate a commitment to developing and implementing a workforce planning process that articulates strategies for recruiting people with a disability.

12. Organisations that are funded to specialise in the provision of training at the foundation levels for people with a disability must also provide and demonstrate clear pathways for transition to higher level studies within same or alternate training organisations.
13. Articulated pathways and relationships between ACFE and TAFE providers will be essential to ensure people with disabilities are able to transition from one training level to the next and encouraging transition from one provider to another.
14. Providers funded through the State must demonstrate a culture of fostering an inclusive learning environment with trainers equipped to recognise and remove barriers to learning within their curriculum development processes.
15. A targeted state wide professional development program is required to ensure all teachers whether sessional, casual, part-time or ongoing are supported to develop the knowledge and skills required to offer genuine inclusive learning opportunities for all students.
16. Minimum standards and guidelines for accessible and inclusive course design and delivery are required as a benchmark for trainers within VET and ACFE.
17. There needs to be a stream lined approach to navigating traineeships and apprenticeships for people with a disability.
18. That Skills Victoria take an active role in ensuring government incentives to employers and people with a disability are designed to support all areas of participation in training and employment for people with a disability.

References

Allen Consulting Group (2005) *'Barriers to and options for increased workforce participation in Victoria; A spotlight on specific population groups'*. <http://www.business.vic.gov.au/> Accessed 13th May 2008.

Australian Government Attorney Generals Department (2008) *Disability Standards for Education* (2005). <http://www.ag.gov.au/> Accessed 12th April 2008

Australian Government: Victorian Public Service Commission (2006) *Employment of people with disability in the APS* <http://www.apsc.gov.au/mac/disabilitye.htm> Accessed 1st June 2008.

Australian Government: Job Access, (2008) *Business benefits of employing people with disability*. <http://www.jobaccess.gov.au> Accessed 12th May 2008

Australian Public Service Commission (2006) *Employment of People with a Disability in APS*. www.apsc.gov.au/mac/disability.htm Accessed 15th May 2008.

Bagshaw, M. (2002) Opening Address: *Setting Directions Conference*. <http://pubsites.uws.edu.au/rdlo/settingdirections> Accessed 11th May 2008

Diversity Council Australia (2005) *Diversity Matters*, Issue No43, August

Human Rights Equal Opportunity Commission (2006) *'Submission to the Australian Fair Pay Commission for Consideration in Determining the First National Wage Decision'*.

Human Rights Equal Opportunity Commission (2008) *Disability Discrimination Act Advisory Notes Version 3.2, 2002* <http://www.hreoc.gov.au/disability> Accessed 29th May 2008.

NSW Government: Office of the Director of Equal Opportunity in Public Employment (2008) *Equal to the Task, A Good Practice Guide*. <http://www.eeo.nsw.gov.au/disabil/index.html> Accessed 31st May 2008.

Komp, C. (2006) *Unemployment, Poverty Higher for People with Disabilities*. The New Standard. <http://newstandardnews.net/> Accessed 21st April 2008.

Ozdowski, S. (2004) Keynote Address: *Employment opportunity the original purpose for the DDA*. ACROD 2004 National Convention: Back to Basics.

Victorian Government (2008) *Securing our future economic prosperity Discussion Paper on Skills Reform*.