



SUBMISSION TO:

**Australian Government Department of Social Services
Reference Group on Welfare Reform to the Minister for Social Services**

A New System for Better Employment and Social Outcomes: Interim Report

PREPARED BY:

SPEECH PATHOLOGY AUSTRALIA

8 August 2014





Introduction

Speech Pathology Australia (SPA) is the national peak body for speech pathologists in Australia, representing more than 6000 members. Speech Pathologists specialise in communication and swallowing difficulties. Communication skills underpin the key indicators of successful modern day society, including the achievement of literacy and numeracy, levels of educational attainment, employment, and income. The impacts of communication disorders are far reaching and debilitating, resulting in poor educational outcomes, reduced employment opportunities and an increased likelihood of social, emotional and mental health issues.

Speech Pathology Australia welcomes the opportunity to provide feedback on the interim report of the Reference Group, *A New System for Better Employment and Social Outcomes* (the Interim Report). The following submission provides comments on concepts and recommendations made in selected parts of the Interim Report as they relate to people with communication disorders and their families/carers.

About Australians with Communication and Swallowing Disorders

Difficulties in speech, language, fluency, voice, social communication and swallowing can occur in isolation or the person may have difficulties in more than one area (for example a patient following a stroke may have speech, language, fluency and swallowing difficulties). These difficulties can arise from a range of conditions and may be present from birth (e.g., cleft palate, Down Syndrome or Autism Spectrum Disorder), emerge during early childhood (e.g., stuttering, severe speech sound disorder or literacy learning difficulties), or during adult years (e.g., traumatic brain injury, stroke and head/neck cancers) or be present in the elderly (e.g., dementia, Alzheimer's disease, Parkinson's disease). Swallowing disorders affect the ability to safely swallow food or liquids and can lead to medical complications including chest infections/pneumonia.

Some people with communication impairments who are unable to or find it extremely difficult to understand or communicate using speech may use an Augmentative and Alternative Communication (AAC) device or method to communicate.

Speech pathologists are the university trained allied health professionals who specialise in treating speech, language, communication and swallowing problems. Speech pathologists work with infants, children, adolescents, adults and the elderly with communication and swallowing problems. We provide services in the acute care (hospitals), sub-acute care and primary care sector as well as within other sectors such as disability, aged care, education, juvenile justice and community settings. We work across public and privately funded services.

Currently there is limited available data regarding the prevalence of communication and swallowing disorders within the Australian population. Best estimates indicate there is in excess of 1.1 million Australians who have a communication or swallowing disorder. This is comparable with the number of people with Diabetes and three times the number of those with Dementia.

Communication impairment is largely a 'silent disability' in Australia with an associated underwhelming policy response at state and federal levels. The prevalence of speech, language and communication disorders and speech pathology services is currently the focus of a federal inquiry by the Senate Community Affairs Reference Committee (see http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/Speech_Pathology) with a final report expected to be tabled to Parliament by 1 September 2014.

People with communication disability, by the nature of their impairments have limited opportunities to engage in public debate and face particular, complex challenges in relation to participating in education, training and employment. Speech Pathology Australia has identified four key groups of Australians with communication disorders and their families which will be impacted by reforms to the social support system in Australia:

1. People with communication disorders where their functional limitations render them permanently unable to participate in the workforce. These people are likely to be eligible for support under the National Disability Insurance Scheme.
2. People with communication disorders, who have functional limitations but who have capacity to participate in the workforce to some degree. These people will face significant barriers to



A New System for Better Employment and Social Outcomes

employment. Most of these people will not be eligible for Tier 3 (individualised) support under the NDIS. It is unclear at this stage how people who are eligible for NDIS and who are able to participate in the workforce will be supported.

3. Children and young people with communication disorders or impairments who require targeted support during their childhood and adolescence in order to ensure they are adequately prepared to enter the workforce after formal education.
4. Carers of people with communication disorders who face significant barriers to participation in the workforce due to their caring responsibilities.

Pillar One

Speech Pathology Australia recognises the important financial, health, psychological and social benefits of employment for individuals, their families and communities. Participation in the workforce should be a basic expectation of adult life in Australia.

However, the Australian government should also provide a safety net for those people who find themselves unable to temporarily or permanently participate in the workforce.

People with a permanent impairment who are unable to participate in the workforce should receive a separate payment from other working age recipients. People with communication disorders who have functional limitations that render them unable to participate in the workforce should not be subjected to the same requirements as those eligible for the employment market – in order to access income support.

Speech Pathology Australia is concerned that some of the proposals in the Interim Report fail to recognise that particular groups of Australians will face significant challenges to employment.

Many people with communication disorders/impairments will have the capacity and willingness to work. However, participation in the workforce generally relies on having communication skills adequate to meet the needs of the job and more basically, to secure a position. An interview process where skills and knowledge are assessed through communication, by its nature is particularly challenging for people with communication disorders. These Australians face significant challenges to accessing the workforce – and these challenges are based on the system and structure of the employment market. In reforming the income support payments, recognition needs to be made that some people of working age have significant barriers to employment based on medical, health or disability considerations. We ask that the Reference Group consider introducing safeguards in the system so as not to unfairly disadvantage people with communication disorders/impairments.

There are a number of medical conditions that cause communication impairments that also cause a fluctuation in ability to work, including because of changes impacting solely on their communication,. This may mean that there may be periods of time where a person's capacity to work is diminished and at other times increased. Reforms to the income support system need to recognise that for some people with communication impairments, their ability to work will not be a fixed capacity and they may need to enter, exit and re-enter the workforce a number of times in response to their capacity. Reforms need to include safeguards in the system so as to not unfairly disadvantage people with communication impairments whose ability to participate in the workforce varies over time.

Reforms also need to recognise that whilst full employment may be ideal, for many people with communication disorders or impairments, full participation in work may not be achievable. For these people, some form of consistent employment (part time or casual) may be the most realistic, achievable and ideal outcome.

Of particular concern is the situation of carers for people with communication disorders and how reforms to the social support system will impact on them. The Interim Report fails to adequately acknowledge the significant economic contribution the work of carers makes to the Australian economy in the form of unpaid work. Reforms to the social support system need to recognise the unique challenges carers face in balancing their requirements for caring with requirements for working. For these carers of people with communication disorders, a more realistic, achievable and ideal outcome may be pursuing consistent part time or casual based employment at a time when their caring responsibilities have reduced. Consideration needs to be made to a separate payment for carers who through their requirements to care, are unable to participate in any way in the paid workforce.





A New System for Better Employment and Social Outcomes

Inherent in the Interim Report is an assumption that when implementing reforms to income support payments that the different tiers could “take account of individual circumstances” such as partial capacity to work. It is of significant concern to Speech Pathology Australia that many people with communication disorders who have some capacity to work will be transferred from the current Disability Support Pension to the working aged tiered payment – without appropriate safeguards in place to ensure the decision making process of ‘taking into account individual circumstances’ is robust, appropriate and consistent. People with communication disorders may not have the capacity to advocate for themselves in dealings with Centrelink to ensure an appropriate judgement is made about their capacity to work full time. Speech Pathology Australia recommends that an assessment of capacity to work full time/part time for people with communications disorders be made by an appropriate healthcare professional and not left to the discretion of Centrelink staff.

Attempts to simplify the social support system through reforms to payment types does nothing to resolve the complex problems that remain for people with communication disorders in participating in the workforce. There appears to be an incongruence between ideas to ‘simplify’ the system whilst at the same time recognising individual circumstances and barriers to participation.

Pillar Two

Speech Pathology Australia would like to focus on the recognition in the Interim Report that ‘some people need additional help and support to develop the capabilities they need to find and keep a job’ (pg. 79). This is acutely the case for people with communication disorders who face significant barriers to participation in the workforce. There is a concern that a renewed focus on mutual obligation (and demonstrating mutual obligation under the threat of sanctions) in the absence of employment and participation support services, would significantly disadvantage people with communication disorders. Whilst the Interim Report indicates that ‘individual exemptions’ may be possible, there is a serious concern that the systems of decision making to determine these exemptions would not appropriately take into account the barriers to employment faced by people with communication disorders. Some people do need additional help and support to find and keep a job – and the Interim Report provides far more detail in regards to what individuals need to do with very limited detail on what supports and services might be made available to help people with the structural barriers to employment.

It is encouraging to see a focus on early intervention in the Interim Report. There needs to be a broader understanding of what early intervention involves when considering issues of employment. In the case of people with a communication disorder that begins in childhood, early intervention needs to begin as focused intervention during their primary and secondary schooling in order to ensure they are work ready on completion of their formal education. Some of this early intervention involves access to speech pathology services, but it is also about ensuring reasonable access to the educational curriculum. The way in which this reasonable access is provided for children and young people with communication disorders varies considerably across jurisdictions. There is strong evidence to indicate that there is a very poor trajectory for children with communication disorders in terms of their longer term educational and employment prospects. A focus on identifying earlier those children and young people who have communication disorders and who will face barriers to employment, a focus on improving literacy and teaching workforce skills is required prior to those young people achieving working age.

Pillar Three

Much of the focus and detail of the Interim Report is on the requirements and obligations of individuals receiving income support payments. In order for people with communication disorders to be in appropriate employment, structural barriers to their participation need to be considered. The ‘will’ of an individual alone is usually insufficient to overcome these challenges and the employment market needs to be able to offer suitable positions and flexibility in workplace arrangements.

Education, training and supports are needed to encourage employers to employ people with communication disabilities. Communication impairments can also affect a person’s productivity. For example, an employee who uses an AAC device may take longer to complete a communication dependent task than someone without a communication impairment. There needs to be increased awareness, training and incentives for employers to support the engagement of people with communication impairments in their workforces.





A New System for Better Employment and Social Outcomes

Communication is a critical workplace skill and communication difficulties can present significant barriers to participation in a work setting. Disability Employment Services need to include communication disability and support employers to create communication accessible work environments. Speech Pathologists can assist in advising Disability Employment Services of practical and realistic ways this can be achieved.

If Speech Pathology Australia can assist in any other way or provide additional information please contact National Office on 03 9642 4899 or contact Dr Ronelle Hutchinson, Manager Policy and Advocacy by emailing policy@speechpathologyaustralia.org.au

