

# **Department of Jobs and Small Business**

## **Future Employment Services – Discussion Paper**

**Children and Young People with Disability Australia**

**Submission – August 2018**

## BACKGROUND

Employment is a fundamental and defining aspect of life in Australia. Children are often asked what they want to be when they 'grow up'; education is focused extensively on preparing students for work; and as adults our profession has a major role in defining self-image and the way someone is viewed by society. Employment, and the social and economic benefits it brings, permeate almost every aspect of Australian culture.

It is critical that any employment initiatives undertaken by government, or others, critically consider the systemic disadvantage which currently confronts children and young people with disability in Australia in all areas of life.

Children with disability remain one of the most disadvantaged cohorts within Australia. Common experiences of childhood for children with disability include: discrimination; low expectations; exclusion; the experience of significant barriers in accessing and participating in a quality and inclusive education; limited social and recreational opportunities; bullying and abuse.

Children with disability often experience siloing or segregation when they access services, supports and other aspects of community life. The result being that children with disability grow up with an experience and expectation of being peripheral or excluded throughout childhood and then in later life.

Available data and research clearly demonstrates the very high representation and risk of children with disability to significant disadvantage and abuse. Associated data also illustrates the high rates of disadvantage experienced by people with disability later in life. This further information reinforces the need for a focus within childhood to change the common trajectory of too many people with disability.

This includes:

- 7% of children with disability aged 0-14 years in Australia have an identified disability<sup>1</sup>;
- 15.2% of Aboriginal and Torres Strait Islander children aged 0-14 years have a disability<sup>2</sup>;
- Most children with disability 0 to 14 (99.7%) live with their families<sup>3</sup>;
- Children aged 0-12 years with disability had a lower representation in child care services (3.0%) compared with their representation in the community in (6.6%). This was the case for both the 0-5 and 6-12 age groups<sup>4</sup>;
- 45.8% of people aged 15 to 64 years with disability's highest level of education was Year 10 or below, compared to 25.7% of people without disability;<sup>5</sup>

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<sup>1</sup> Australian Bureau of Statistics 2012, *Australian Social Trends June 2012*, Commonwealth of Australia, Canberra, p. 15.

<sup>2</sup> Australian Bureau of Statistics 2012, *Aboriginal and Torres Strait Islander People with a Disability, 2012*, Cat. no. 4433.0.55.005, ABS, Canberra.

<sup>3</sup> Australian Bureau of Statistics 2008, *Australian Social Trends, 2008*, Cat. no. 4102.0, ABS, Canberra.

<sup>4</sup> Productivity Commission 2014, *Report on Government Services 2014*, Commonwealth of Australia, Canberra, viewed 6 August 2018, <https://www.pc.gov.au/research/ongoing/report-on-government-services/2014/child-care,-education-and-training/download-the-volume/rogs-2014-volumeb-child-care-education-and-training.pdf>, p. 3.18.

<sup>5</sup> Australian Bureau of Statistics 2016, 'Table 7.3 Persons Aged 15 Years and Over, Living in Households, Disability Status, by Selected Social Characteristics—2015, Proportion of Persons,' *Disability, Ageing and Carers, Australia: Summary of Findings, 2015*, Commonwealth of Australia, Canberra.

- For people aged 20-24, 64% of people with disability had completed year 12 or equivalent, compared with 81% of people without disability<sup>6</sup>;
- 17% of people with disability have completed a Bachelor Degree or higher compared to 30.1% of people without disability;<sup>7</sup>
- International research suggests children and young people with disability are 3 times more vulnerable to abuse than their peers<sup>8</sup>;
- Children and young people with high communication and behaviour support needs have higher vulnerability again to abuse<sup>9</sup>;
- 56% of students with disability report experiencing bullying at school<sup>10</sup>;
- 15% of children in out of home care are identified as children with disability<sup>11</sup>;
- 38% of young people aged 15 to 24 years with disability either work, study, or do a combination of both on a full time basis compared to 56% of young people without disability<sup>12</sup>;
- 42% of young people with disability neither work nor study. There is no comparative data available for young people without disability;<sup>13</sup>
- 24.2% of young people with disability aged 15 to 24 years are unemployed, compared to 11.4% of young people without disability;<sup>14</sup>
- Unemployment rates for people with disability are almost double that of people without disability (10% to 5.3%)<sup>15</sup>;
- People with disability are less likely to be in full-time employment than people without disability (27% to 53.8%)<sup>16</sup>;
- The labour force participation rate for people with disability is 53.4% compared to 83.2% for people without disability<sup>17</sup>; and
- 45% of people with disability in Australia live near or below the poverty line<sup>18</sup>.

As mentioned above, the disadvantage experienced by children and young people in Australia's education system is profound. The current inadequacies of the Australian education system mean that many students with disability have limited opportunities to develop essential foundational work skills and knowledge.

For young people with disability accessing and maintaining employment is rarely experienced as a positive and meaningful experience. Instead, accessing and obtaining employment is typically

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<sup>6</sup> Australian Bureau of Statistics 2016, *Disability, Ageing and Carers, Australia: Summary of Findings, 2015*, Cat. no. 4433.0, ABS, Canberra.

<sup>7</sup> Ibid.

<sup>8</sup> Sullivan et al. 2000, *Maltreatment and disabilities: A population-based epidemiological study*, p. 1257.

<sup>9</sup> Ibid.

<sup>10</sup> Children and Young People with Disability Australia 2017, *CYDA National Education Survey 2017*, Melbourne.

<sup>11</sup> Australian Institute of Health and Welfare 2017, *Child Protection Collection 2017*, Table S41.

<sup>12</sup> Australian Bureau of Statistics 2012, *Australian Social Trends June 2012*, Commonwealth of Australia, Canberra.

<sup>13</sup> Ibid.

<sup>14</sup> Australian Bureau of Statistics 2015, 'Table 4: ALL PERSONS AGED 15 TO 64 YEARS LIVING IN HOUSEHOLDS, Labour Force Status by Whether Have a Disability by Age,' *Disability and Labour Force Participation, 2012*, Commonwealth of Australia, Canberra.

<sup>15</sup> Australian Bureau of Statistics 2015, *Survey of Disability, Ageing and Carers: Summary of Findings*, 4430.0.

<sup>16</sup> Australian Bureau of Statistics 2015, *Disability and Labour Force Participation*, Commonwealth of Australia, Canberra, viewed 9 February 2015, <http://www.abs.gov.au/ausstats/abs@.nsf/mf/4433.0.55.006>.

<sup>17</sup> Australian Bureau of Statistics 2016, *Disability, Ageing and Carers, Australia: Summary of Findings, 2015*, Cat. no. 4433.0, ABS, Canberra.

<sup>18</sup> PricewaterhouseCoopers 2012, *Disability expectations: Investing in a better life, a stronger Australia, Australia*, p. 3.

characterised by disadvantage, discrimination and exclusion with young people with disability experiencing extremely high rates of unemployment and underemployment.

Further, young people with disability continue to be denied adequate supports and services necessary to access and sustain employment. While the National Disability Insurance Scheme may go some way to address the adequacy of services, it is still in its infancy, and even when it is fully established, it will only address some of the barriers to employment which exist.

Children and Young People with Disability Australia (CYDA) views the development of a generalist employment service framework, which meets the needs of people with disability, as an important element of reducing the employment gap. However, the breadth of casual factors contributing to low employment outcomes for people with disability mean the reform of generalist services must be accompanied by broader concurrent reforms to address other systemic barriers, in order to be successful.

Due to the large volume of options and suggestions set out in the Discussion Paper, CYDA does not have the capacity to address each proposal individually. This submission will therefore focus on detailing the contextual and direct barriers to employment faced by young people with disability before making comment on specific elements of concern from the Future Employment Services Discussion Paper (the Discussion Paper).

## **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. The organisation is primarily funded through the Department of Social Services and is a not for profit organisation. CYDA has a national membership of 5300 and a growing social media presence with 22 500 followers across the three major platforms of Facebook, Twitter and LinkedIn.

CYDA provides a link between the direct experiences of children and young people with disability to federal government and other key stakeholders. This link is essential for the creation of a true appreciation of the experiences and challenges faced by children and young people with disability.

CYDA's vision is that children and young people with disability living in Australia are afforded every opportunity to thrive, achieve their potential and that their rights and interests as individuals, members of a family and their community are met.

CYDA's purpose is to advocate systemically at the national level for the rights and interests of all children and young people with disability living in Australia and it undertakes the following to achieve its purpose:

- **Listen and respond** to the voices and experiences of children and young people with disability;
- **Advocate** for children and young people with disability for equal opportunities, participation and inclusion in the Australian community;
- **Educate** national public policy makers and the broader community about the experiences of children and young people with disability;
- **Inform** children and young people with disability, their families and care givers about their citizenship rights and entitlements; and
- **Celebrate** the successes and achievements of children and young people with disability.

## LEGISLATION AND POLICY FRAMEWORK

Australia has a strong commitment to the rights and entitlements of children and young people with disability as evidenced by a comprehensive legislative and policy framework, which includes specific reference to employment.

Australia is a signatory to the United Nations *Convention on the Rights of Persons with Disabilities 2006* (CRPD) and the *Convention on the Rights of the Child* (CRC). These Conventions contain clear standards and obligations regarding the rights of children and young people with disability to enjoy equal access to education and employment.

The CRC affirms that State Parties are to:

*'Encourage the development of different forms of secondary education, including general and vocational education, make them available and accessible to every child, and take appropriate measures such as the introduction of free education and offering financial assistance in case of need; make higher education accessible to all on the basis of capacity by every appropriate means; make educational and vocational information and guidance available and accessible to all children'*<sup>19</sup>.

State Party obligations under the CRPD are as follows:

*'State Parties recognise the rights of persons with disabilities to work, on an equal basis with others; this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities. State Parties shall safeguard and promote the realization of the right to work, including for those who acquire a disability during the course of employment, by taking appropriate steps, including through legislation'*<sup>20</sup>.

The CRPD also includes an obligation to *'promote employment opportunities and career advancement for persons with disabilities in the labour market, as well as assistance in finding, obtaining, maintaining and returning to employment'*<sup>21</sup>.

The *National Disability Strategy 2010-2020* is the major policy framework designed to guide reform for all Australian governments to address the barriers faced by Australians with disability. Under this framework, increasing access to employment opportunities for people with disability is one of the key national policy priorities Australia has agreed to progress<sup>22</sup>.

Further, supporting *'economic and social participation'* of people with disability is a central focus of the National Disability Insurance Scheme (NDIS)<sup>23</sup>. CYDA has repeatedly raised concerns regarding the progression and clarification of the interface of the NDIS with mainstream services. Despite some progress, substantial work remains to be done to ensure service gaps do not exist and a seamless interface of services is achieved. The new employment services framework must not be developed in isolation, rather matters of interface must be considered and clarified before the new framework is implemented.

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<sup>19</sup> United Nations General Assembly 1989, *Convention on the Rights of the Child*, Article 28

<sup>20</sup> United Nations General Assembly 2006, *Convention on the Rights of Persons with Disabilities*, Article 27

<sup>21</sup> United Nations General Assembly 2006, *Convention on the Rights of Persons with Disabilities*, Article 27(1)e

<sup>22</sup> Commonwealth of Australia 2011, *National Disability Strategy 2010-2020*, p. 42

<sup>23</sup> *National Disability Insurance Scheme Act (Cth)*, s.3.1.c

Likewise, the new employment services framework must have regard to the recent Disability Employment Services reforms and the current supported employment consultations to avoid the further segregation of generalist and disability specific employment services.

## **THE DIRECT EXPERIENCE OF YOUNG PEOPLE WITH DISABILITY**

### **Education**

CYDA is inundated with reports of poor and shameful education experiences. A typical school experience for students with disability involves discrimination, limited or no funding for support and resources, inadequately trained staff, a systemic culture of low expectations, exclusion and bullying. There are increasing incidents of restraint and seclusion reported to CYDA, which are seen as a clear consequence of a system in crisis.

The following statements demonstrate the breadth of poor school experiences of students with disability:

*Not one school would take (my son) as they said "he's 16 and legally doesn't have to be at school." This was despite my son wanting an education.*

*My son was expelled from our only zoned school in Grade One. The next two closest schools refused to accept him. I then began ringing around and more than 40 government primary schools refused to take him or said they would only if...compelled to. In the end the education department said I could choose any school and they would compel the school to take him. I chose the least resistant school, which is a 30-45 minute drive from home.*

*My kids had learning disabilities and they were excluded from field trips because it was too much for the teachers. They were made to sit in a room by themselves in the office because it was too hard for the teacher to teach the other 20 something kids and mine then they just decided to send them home halfway through the day and suspended them for a couple of days at a time.*

*I phoned the education department and complained as my disabled daughter was strapped into her chair from 9.00am till 3.00pm every day and they told me, that I must have given the school permission to do it and hung up on me... disgusting how these kids are treated... Oh and by the way, this was not a mainstream school but a special school so they should have known better!!!!*

### **Post School Transition**

CYDA has undertaken extensive work on post school transition and students with disability. This includes the publication of the issue paper *Post School Transition: The Experiences of Students with Disability*<sup>24</sup>.

Students with disability consistently report to CYDA that the direct experience of the post-school transition is characterised by limited information about options, negative attitudes and low expectations from schools, employment programs and higher education providers. Despite the number of programs available, post-school transition experiences of young people with disability remain poor, correlating with poor employment and life outcomes.

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<sup>24</sup> Children and Young People with Disability Australia 2015, *Post School Transition: The Experiences of Students with Disability*

If young people with disability are not afforded a quality education and are not adequately supported during the post-school transition period, poor employment outcomes will continue to be the norm.

***Recommendation 1: Education reform for students with disability needs to be prioritised and be implemented in accordance with rights afforded under the CRC and CRPD.***

## **Employment**

The social, community, economic and personal benefits of employment are well known and are strongly demonstrated in research and through direct experience. However, despite the existence of a robust human rights framework, strong political commitment and the high cultural value of work, the employment experiences and outcomes of young people with disability continue to be extremely poor. When it comes to employment, limited progress has been made for people with disability over the last 20 years<sup>25</sup>.

Youth unemployment remains over double the total unemployment rate<sup>26</sup>. There has also been a trend in recent years towards casual, part time, temporary or short-term contracts for young people who are employed.<sup>27</sup> This creates a number of issues, including job insecurity, lack of access to work entitlements and fewer opportunities to develop skills in a stable work environment. The recently released *Household, Income and Labour Dynamics in Australia Survey* also found that underemployment is highest among young workers<sup>28</sup>.

These employment challenges are compounded for young people with disability as a result of the additional unique barriers to employment which have previously been outlined. These include discrimination<sup>29</sup>, negative attitudes, and barriers to accessibility such as transport and standardised job assessments, limited resources and access to information and low expectations<sup>30</sup>.

The direct experience of young people with disability demonstrate the inadequacies of the existing system. Examples include:

*I was never encouraged to achieve and found that expectations were very low for me. It was therefore entirely up to me to achieve what I have.*

*I'm so tired of the only local employment options for my son being limited to...the rubbish recycling plant or the laundry! Why shouldn't he be able to aspire to do something he loves?*

<sup>25</sup> Australian Human Rights Commission 2016, *Willing to Work National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability*, p. 11

<sup>26</sup> Australian Bureau of Statistics 2018, *Labour Force Commentary June 2018*, Commonwealth of Australia, viewed 2 August 2018, <http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/6202.0Main%20Features2Jun%202018?opendocument&tabname=Summary&prodno=6202.0&issue=Jun%202018&num=&view=>

<sup>27</sup> Foundation for Young Australians 2014, *Renewing Australia's promise: Will young Australians be better off than their parents?*, p. 12, Foundation for Young Australians 2015, *Report card 2015: How are young people faring in the transition from school to work?*, p. 7.

<sup>28</sup> Wilkins, Roger and Inga Lass (2018) *The Household, Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 16*. Melbourne Institute: Applied Economic & Social Research, University of Melbourne, p 63

<sup>29</sup> Australian Human Rights Commission 2016, *Willing to Work National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability*, p. 12

<sup>30</sup> Ibid

*Getting a job in the first place is a nightmare!! People judge my ability to work, based on an interview which I greatly struggle with.*

*You think the education system is bad, wait until the employment system!*

*I tried the employment services but they could not help me as they said I was too disabled.*

*I feel stranded. I don't think I have a future.*

The Australian Human Rights Commission in their *Willing to Work* inquiry also found that one in twelve people with disability reported they had experienced discrimination because of their disability, with rates of reported discrimination higher among 15-25 years<sup>31</sup>. An employer was the source of discrimination for almost half of working aged people with disability who were unemployed<sup>32</sup>.

Beyond Australia's moral and legal obligations to reduce the employment gap for people with disability, it is also noted that the Deloitte Access Economic report, *'The Economic Benefits of Increasing Employment for People with Disability'* also found that substantial increases in Gross Domestic Product would result<sup>33</sup>.

### **Intersectionality**

Intersectional disadvantage can compound the barriers of people with disability accessing and sustaining employment. This is demonstrated above in the discussion of the intersection of age and disability but can also include other factors such as gender, English as a second language and Aboriginal and Torres Strait Islander background.

For example, unemployment rates for Aboriginal and Torres Strait Islander people were higher than those for non-Indigenous people across all age groups with the most profound difference occurring for young people; 27% compared to 14% for non-Indigenous people<sup>34</sup>.

For people experiencing intersectional disadvantage, the already substantial barriers to employment can be complex and extremely significant. The impacts of intersectional disadvantage therefore need to be given careful consideration when progressing the design of the new employment services framework.

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<sup>31</sup> Australian Human Rights Commission 2016, *Willing to Work National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability*, p. 12

<sup>32</sup> Ibid

<sup>33</sup> Deloitte Access Economics 2011, *The Economic Benefits of Increasing Employment for People with Disability*, p. ii

<sup>34</sup> Australian Bureau of Statistics 2016, *Census of Population and Housing of Aboriginal and Torres Strait Islander Australians*, Commonwealth of Australia, viewed 1 August 2018, [http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/2076.0Main%20Features512016?opendocument&t](http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/2076.0Main%20Features512016?opendocument&tabname=Summary&prodno=2076.0&issue=2016&num=&view=)  
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## **SPECIFIC COMMENTS ON DISCUSSION PAPER**

CYDA wishes to express an overarching concern regarding the requirement for the new generalist employment framework to be cost neutral. This is not feasible if the goals of the Discussion Paper are to be achieved.

While the necessity of a financially sustainable system is acknowledged, this must not come at the cost of meeting the needs of disadvantaged jobseekers. If cost constraints have the effect of transforming targeted services into overly limited or rationed services there is a substantial risk that the new system will perpetuate long term unemployment and poor outcomes for disadvantaged jobseekers.

***Recommendation 2: That the new employment services framework prioritise the provision of necessary services over cost neutrality.***

### **Online Government Platforms**

CYDA notes that one of the key proposals set out in the Discussion Paper is the progression of an online employment services platform with the aim of moving those jobseekers deemed as job-ready or requiring minimal assistance onto this portal to effectively self-service.

While advances in technology have the potential to deliver substantive benefits for some jobseekers, there is also the potential for an online platform to create additional barriers to accessing the services provided on that platform.

For example, in recent years CYDA has received a number of concerning reports relating to the accessibility of online government services including Centrelink processes, particularly in relation to the automated debt recovery system. People affected by the automated debt recovery system were typically directed to use the *MyGov* portal. However, for many this system is not intuitive and can be difficult to navigate. Many people reported to CYDA that the system can be extremely challenging to use.

***Recommendation 3: That the direct experience of people with disability, including young people with disability, informs the design and user testing of any and all online platforms associated with the new employment framework.***

CYDA is concerned about the length of time jobseekers will be directed to use the online platform before becoming eligible for enhanced services. The Discussion Paper suggests that this period should be set at the point the jobseeker becomes long term unemployed (12 months). CYDA is concerned that such a system, without appropriate safeguards, could risk leaving jobseekers who require additional support stranded without appropriate assistance.

CYDA acknowledges that a number of monitoring and intervention options are presented in the Discussion Paper however without information regarding their effectiveness and their impact on young people with disability, it is difficult to provide informed comment on specific proposals.

From a broad perspective, it is CYDA's view is that effective assessment and choice should be the guiding principle in relation to the online platform.

***Recommendation 4: That all jobseekers undertake a face-to-face meeting with an employment services provider prior to being directed to the online platform where information regarding the use of the platform and any jobseeker obligations will be explained.***

***Recommendation 5: That the direct experience of people with disability, including young people with disability, informs the design of the new assessment tool used to determine eligibility for enhanced services and the information provided to jobseekers in line with Recommendation 4.***

***Recommendation 6: That the use of the online platform is not mandatory and jobseekers using the online platform have the option to access face-to-face support if they choose.***

### **Enhanced Services**

CYDA strongly agrees with the proposal to ‘direct additional resources to the most disadvantaged to help them find employment faster’<sup>35</sup> and stay in work. Consultation undertaken by CYDA has revealed that young people with disability engaging with generalist and specialist employment services often do not currently feel they have choice or control over the support provided.

For example, consultation undertaken by CYDA in relation to the DES reforms found there was a strong consensus that the DES system had too high a focus on compliance, consuming the work of DES’s instead of supporting people with disability to gain and keep work long term. This is accompanied by a focus on the star-rating system under which DES operates which often results in an unwillingness to work with people with higher support needs who may require more immediate training and support.

Many young people with disability report being compelled to undertake what has been experienced as inappropriate training, service providers focusing on activities like resume writing while neglecting hands on experience and encountering low expectations and ableist attitudes.

*The system is pushing [my son] through a retail course and he cannot count money.*

In relation to choice of provider, CYDA has received feedback suggesting that barriers to effective agency are not limited to the number of providers in a region. The caseload of popular providers, and the availability of information will also limit the ability of young people with disability to effectively exercise choice.

***Recommendation 7: That the new employment services framework is flexible, person-centred and affords young people with disability choice and control over the employment pathway.***

***Recommendation 8: That the direct experiences of people with disability, including young people with disability, inform the design of the new employment services framework to ensure jobseekers can exercise choice of service provider.***

### **Quality of Service and Minimum Requirements**

The unique disadvantage faced by young people with disability, high rates of discrimination and ongoing poor employment outcomes all speak to the necessity of ensuring that employment service providers have the skills, knowledge and resources to provide appropriate assistance and support to young people with disability.

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<sup>35</sup> Department of Social Services, *The next generation of employment services*, Commonwealth of Australia, p 24.

This can only be achieved by setting a strong set of minimum requirements for employment services providers that are clear, consistent and enforceable.

**Recommendation 9:** *That the Department consult with people with disability to develop a set of minimum requirements in relation to all aspects of an employment service provider's interactions with people with disability.*

## **SUMMARY OF RECOMMENDATIONS**

**Recommendation 1:** *Education reform for students with disability needs to be prioritised and be implemented in accordance with rights afforded under the CRC and CRPD.*

**Recommendation 2:** *That the new employment services framework prioritise the provision of necessary services over cost neutrality.*

**Recommendation 3:** *That the direct experience of people with disability, including young people with disability, informs the design and user testing of any and all online platforms associated with the new employment framework.*

**Recommendation 4:** *That all jobseekers undertake a face-to-face meeting with an employment services provider prior to being directed to the online platform where information regarding the use of the platform and any jobseeker obligations will be explained.*

**Recommendation 5:** *That the direct experience of people with disability, including young people with disability, informs the design of the new assessment tool used to determine eligibility for enhanced services and the information provided to jobseekers in line with Recommendation 4.*

**Recommendation 6:** *That the use of the online platform is not mandatory and jobseekers using the online platform have the option to access face-to-face support if they choose.*

**Recommendation 7:** *That the new employment services framework is flexible, person-centred and affords young people with disability choice and control over the employment pathway.*

**Recommendation 8:** *That the direct experiences of people with disability, including young people with disability, inform the design of the new employment services framework to ensure jobseekers can exercise choice of service provider.*

**Recommendation 9:** *That the Department consult with people with disability to develop a set of minimum requirements in relation to all aspects of an employment service provider's interactions with people with disability.*

CYDA welcomes the opportunity to provide feedback on the Discussion Paper and can be contacted if further information is required or to discuss this submission.

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