



18 May 2020

**Royal Commission into Violence, Abuse, Neglect and  
Exploitation of People with Disability**

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To whom it may concern,

**Employment Issues paper**

Thankyou for an opportunity to respond to the Employment Issues paper.

**Introduction**

Participating in the workforce is important for social inclusion and economic independence. Having disability can impact on a person's ability and opportunities to participate in paid work. The proportion of people with hearing disability who are in the labour force is associated with the severity of their limitation, or to put another way the degree of workplace accommodations required for reasonable and necessary support to do a job.

People with hearing loss have poorer educational and employment outcomes than the rest of the population. The number of people with more severe degrees of hearing loss reporting completing a trade course or higher is less than half that of the general population. People with hearing loss were 2.42 times less likely to have completed high school.

Australia has a well developed public hearing services infra-structure for children and retired people. However, no such infra-structure exists for people of working age. This group is associated with the largest socio-economic impact of hearing loss - lost productivity. Notably the productivity impact in terms of unemployment is on adults aged over 45 years – younger people with hearing loss had employment rates comparative to the rest of the community. Under-employment appeared to be more of an issue to younger people with hearing loss. By contrast, people with hearing loss are largely silent in official welfare and employment statistics. The numbers of people identified in official statistics with hearing loss were disproportionately low given the epidemiological data that also captured unemployment rates. Preliminary research in this area suggests that people with hearing loss are on the margins of the workplace and struggle to maintain their employment. Key problems include equally participating in meetings, coping with background noise and discrimination, keeping up to date with informal conversations, negotiating reasonable communication accommodations and being able to participate in spontaneous but critical workplace conversations. Research is required that more systematically articulates the impact of

hearing loss on employment opportunities, particularly in the middle working years and in turn identifies strategies that address this impact.

### **Productivity losses**

People with hearing loss are 25% less likely to be earning higher incomes than people without hearing loss. People with hearing loss were also reported to be twice as likely to earn less than \$30,000.

### **Employment impacts**

Hearing loss can have an impact on a person's capacity to work. If employment rates are lower for people with hearing loss, this loss in productivity represents a real cost to the economy.

Of people with hearing problems aged 15–64 years, 55.6% reported being in paid work compared with 62.4% of people without hearing problems, a net difference of 6.8%. Notably 5.3% of respondents reported their employment status as retired (early) but for people with hearing problems aged 15–64 years, 12.1% reported being retired versus 4.3% (93/2173) of people without hearing problems. The annual cost of lost earnings due to workplace separation and early retirement from hearing loss is \$6.67 billion. This equates to 0.79% of GDP.

### **Taxation revenue foregone**

Access Economics estimates that in 2005, \$2.00 billion of potential taxation revenue was lost due to the reduced participation of people with hearing loss in the paid workforce. Of this, \$1.33 billion (67%) was lost income tax and \$0.67 billion (33%) was lost consumption tax.

### **Absenteeism**

Hearing loss does not appear to induce extra costs in terms of additional absenteeism. Indeed, the opposite may be the case as, in one study, people with hearing loss were less likely to have been absent from work in the previous two months. This phenomenon may be explained by the postulate that people with hearing disability may experience greater job insecurity and hence be less prepared to take time off, even when unwell.

### **Financial costs summary**

The total real financial costs of hearing loss are estimated as \$11.75 billion in 2005. Lost earnings to individuals with hearing loss is the greatest cost, accounting for well over half of all financial costs (\$6.7 billion). The deadweight costs from losing taxation revenue and having to find alternative sources of taxation to fund increased welfare and health services, cost \$1.0 billion in 2005.

Source: Listen Hear! The economic impact and cost of hearing loss in Australia. Access Economics, 2006

## **Barriers to employment**

It is clear to Deafness Forum of Australia that people who are hearing impaired, have an ear disorder or are Deaf have the ability to work and they want to work. However, they face significant challenges to participation in employment that will be wholly unfamiliar to most of their hearing peers who are without disability.

People who want to participate in the labour force and have a hearing loss face challenges that are unfamiliar to most of their hearing peers: for some, the barriers become evident, start at or before the process of searching for work and, for many, they become more acute during the selection process or at work. A loss of hearing can also lead people to exit the labour force sooner than they would like to, and before their intended age of retirement.

Deafness Forum of Australia believes the problem may be worse than currently perceived. There is, we believe a significant under-reporting of disability amongst people who are hearing impaired or have a chronic disorder of the ear.

There are three major categories of barriers that restrict or prevent equal employment participation by people who are Deaf, hearing impaired or have ear disorders:

- Attitudinal
- Environmental
- Systemic

Attitudinal barriers include:

- Workplace cultures inherently resistant to change, with a common lack of awareness and understanding of hearing loss. Employers often assume that people with disability will be more expensive, either in time and/ or resources to employ, or that they are under-skilled or needy; or the general misperception that people with implants and hearing aids can hear “like a normal person”.
- Widespread lack of awareness, we believe, of the process and mutual obligations that exist in employment support programs, such as the current Employment Assistance Fund system for both employees and employers.
- Lack of employer appreciation for the workplace stress that people who have a hearing impairment experience via perceptions of a less secure employment status or tenancy, being subject to workplace isolation and often being engaged in less challenging work roles relative to their skills and experience.
- Devaluing of disabled people through negative images and stereotypes in the public media.

Environmental barriers include:

- Ineligibility for, insufficiency and / or inflexibility, or timeliness of services offered by the Employment Assistance Fund.
- Lack of physical and equivalent access to services, such as a staff meeting that is conducted without real-time communication supports for an employee attending who is hearing impaired.

Systemic barriers include:

- Inherently discriminatory job advertisements and recruitment processes such as not enabling hearing impaired and Deaf people to enquire about jobs and accept offers of interviews by methods other than using the telephone; not providing a written version of questions that will be asked at the interview immediately before the interview or at the interview and not providing Auslan interpreters or live captions at interview.
- Size and scale of a business or organisation, with small-to-medium organisations less likely than large organisations to have effective disability programs in place.
- Lack of appropriate employment or career advancement opportunities. This is illustrated by declining rates of disability employment within the Public Service sector.
- Inaccessible workplace training and skills development activities.

Connelly's report<sup>1</sup> found that people with hearing impairment and related problems had difficulty, not only in finding suitable work, but in achieving ongoing success at work, including advancing their careers and obtaining promotions:

*“Survey participants who were trying to find work commonly reported being disadvantaged by the reliance of some recruiters on telephone interviews or the demand that prospective applicants telephone for an information package about an advertised job.*

*Some respondents reported facing a dilemma as to whether or not to declare their hearing impairment to prospective employers at all, or at which stage of the recruitment process to do so.*

*A related theme concerned perceived discrimination by employers and by employment agencies.*

*Some respondents were suspicious that the vague explanations they had been given for not being offered a job were concocted when their hearing impairment was declared and that job descriptions were suddenly modified (e.g. “but this job includes substantial telephone work”) as an exclusionary tactic by employers.*

*In the subsample that was looking for work or more hours approximately 20% of respondents believed that employers are reluctant to hire people with disabilities, while approximately 14% indicated their “own health or disability” was the main reason they couldn't find more work, and approximately 11% indicated that they did not have access to the right equipment, support or technology they would need to work.*

*More than 40% of respondents reported feeling disadvantaged by their hearing impairment when they were trying to secure work and 53% reported feeling disadvantaged by their hearing loss at work.”*

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<sup>1</sup> “Labour force activities, barriers and enablers for people with a hearing impaired: the workforce barriers and incentives study”, Professor Luke B Connelly, Report No.13, Australian Centre for Economic Research on Health (September 2012)

People who have a hearing impairment also experience a large array of significant workplace stressors,<sup>2</sup> including a more stressful work environment, less secure employment and being engaged in less challenging work activities that are not commensurate with the employee's professional qualifications, skills and experience.

### Government interventions

- A best practice policy created by the Australian Government and enacted by the Australian Public Service that sets out barrier- and discrimination-free recruitment strategies from advertising to interviewing to hiring. All organisations, both public and private, should be required to apply the policy.
- Determination of a world-leading benchmark in disability employment participation rates – from intake to leadership and career levels in between – and its promotion as a goal for all employer organisations in Australia.
- Governments to implement Recommendation 2 (chapter four) Access and Services of the Hear Us: Inquiry into Hearing Health in Australia, viz:  
*“The committee recommends that the Department of Education, Employment and Workplace Relations engage with state and territory jurisdictions, and with employment and hearing loss peak bodies, to develop a 10 year strategy to better support, engage and retain hearing impaired Australians in the workforce. The strategy should be made publicly available, and detail annual performance targets and the level of resources committed to achieving them.”*

#### Employment Access Fund in particular

- A generic Employment Access Fund (EAF) assessment to people with a disability before they commence or seek employment. Their “EAF passport” would provide access to the EAF and any workplace-specific modifications could then be more readily accessed as add-ons or via a short form application process. For example, in the case of a person who is hearing impaired or Deaf, the generic EAF assessment could cover standard communication related modifications and so on, with any specific requirements for a workplace to be accessed separately as and when required.
- The EAF needs to be more flexible and able to meet other work-related requirements of recipients. For example, more emphasis needs to be placed on supporting the needs of employees at informal and social functions within their workplace as these are often crucial to forming productive networks with colleagues and enabling access to future career progression opportunities. This could include a social one on one lunch break meeting or morning tea with a supervisor or other team members and so on. Should the National Disability Insurance Scheme exclude some people who are hearing impaired or Deaf, the EAF needs to be available to support the cost of using of hearing aids, if these are a primary workplace modification required by an EAF recipient.

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<sup>2</sup> “Fairer Hearing: a study of the social relations of hearing”, ANU (Anthony Hogan) and a discussion on the indicators from Karasek's Whitehall study (1998).

- The EAF needs to be accessible to people who are hearing impaired or Deaf who wish to undertake volunteer or community work as a way of enhancing their skills and experience and making them more employable in the future.
- Provision of increased EAF support funding for applicants who are promoted to management positions to ensure that there are no artificial caps which restrict the career advancement opportunities of people with a disability.
- More sensory disability awareness training provided to EAF consultants, so they fully understand and appreciate the barriers faced by people who are hearing impaired or Deaf.
- A national, ongoing strategy to engender greater awareness by employers of the entitlements of individual employees under the EAF program.
- An up-to-date knowledge bank of the main examples of EAF workplace modifications.
- An up-to-date survey undertaken of employers and employees that will lead to published data on the level of public awareness of the EAF and its functions.

Thank you for the opportunity to comment. I do not require any confidentiality for this letter, which may be made publicly available.

Yours sincerely



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