



Disability Employment Strategy 2020-2025 Interim Evaluation

September 2023

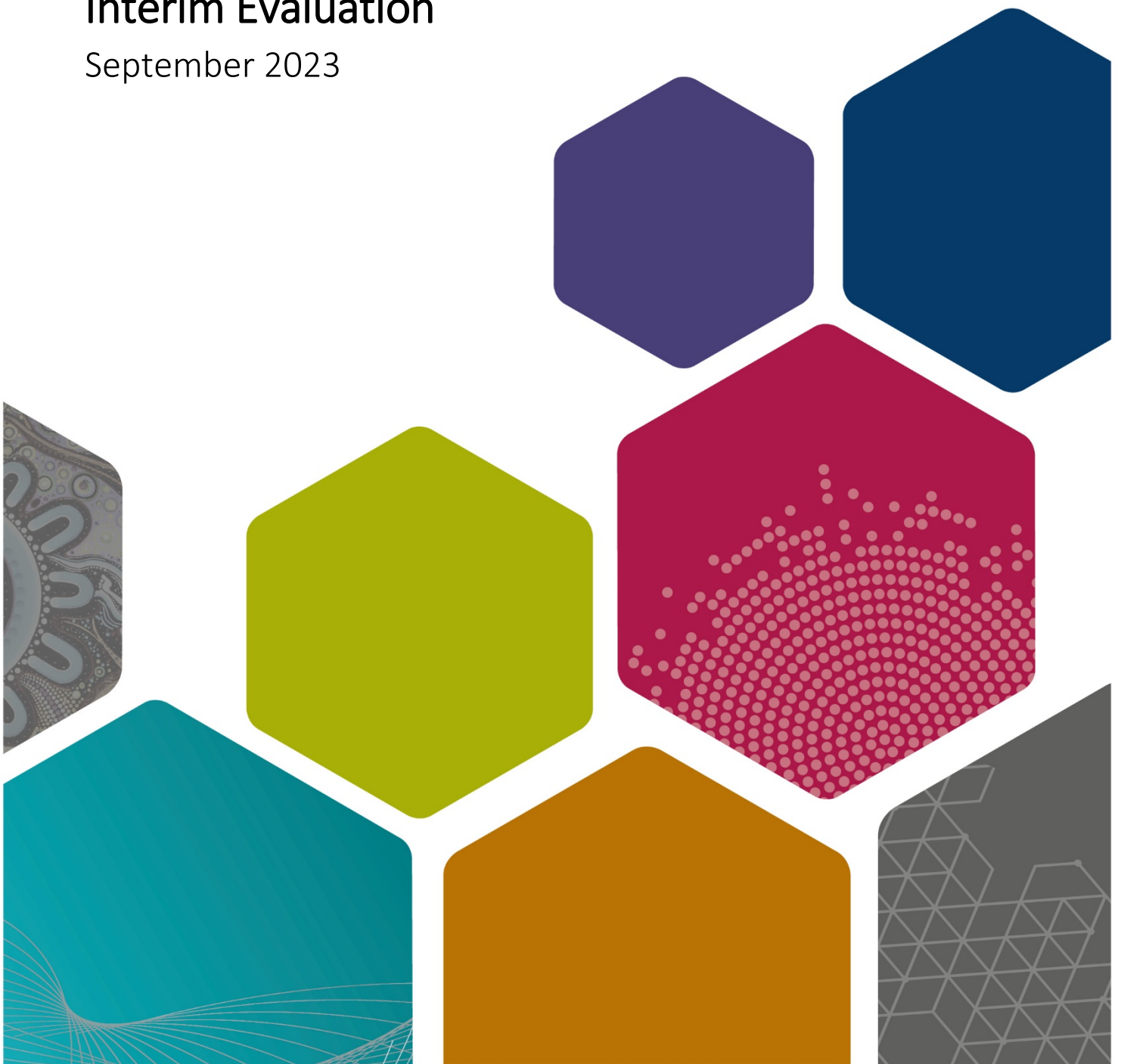


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Executive Summary

The [Australian Public Service Disability Employment Strategy 2020-2025](#) (Strategy) aims to increase the employment of people with disability across the APS to 7% by 2025. It does this by recommending a number of actions across two focus areas (attract, recruit and retain more people with disability; and accessible and inclusive workplace cultures and environments), and with actions specifically for the Australian Public Service Commission (APSC), departments and agencies, and the Senior Executive Service. The Strategy also supports [Australia's Disability Strategy 2021-2031](#), the national disability policy framework agreed by all governments.

This report considers progress against the target and provides an assessment of activities undertaken related to the Strategy's actions from December 2020 to December 2022, as well as updated data from the APS Employment Database (June 2023) and the 2023 APS Employee Census where possible. These assessments also highlight key opportunities that may assist with focusing efforts to drive progress.

The APS' progress against the 7% employment target for people with disability has been slow and further work is required to overcome barriers to reporting

As of 30 June 2023, 5.1% of employees were identified as having a disability in the APS Employment Database, which is a collection of information gathered from the human resources (HR) systems of APS agencies.¹

However, there continues to be fewer employees with disability reported to the APS Employment Database compared to the anonymous APS Employee Census, which relies on self-reported data. Data from the 2023 APS Employee Census indicates that 10.9% of staff identify as having a disability.

A current Department of the Prime Minister and Cabinet Behaviour Economics Team project is seeking to identify opportunities to close the gap between the formal disability figures from HR systems, and the anonymous disability figures obtained through the APS Employee Census. Results will be available towards the end of 2023, and will be promulgated across the APS to inform their own policies and practices.

Work is underway in the APS to attract, recruit and retain more people with disability

This interim evaluation found that:

- A whole of Australian government approach to large-scale recruitment was investigated but considered impractical after discussions by the APSC with agencies. Instead, focus has moved to providing guidance that supports recruitment teams and hiring managers to expand employment opportunities for people with disability.

¹ Note that this figure includes in its denominator those staff that choose not to give their disability status information to their agencies, and staff missing disability status information on their records. This calculation approach was used when the Strategy was first established, and so the same methodology is being used in this interim evaluation.

- Work is underway that will consider how the APS value proposition supports diversity and inclusion in the APS.
- Work is underway to develop a disability EVP tool to help the APS actively seek out skilled and talented people with disability, as well as improve the APSJobs website, and develop centralised guidance to support departments or agencies who wish to advertise suitable positions on [The Field](#) (a disability-led platform that connects job seekers with disability with inclusive organisations).
- Progress has been made in modernising recruitment systems and practices and uplifting the capability of recruiters in the APS to better attract employees with a disability.

Work is also underway to ensure accessible and inclusive workplace cultures and environments, though there are opportunities to do more, and to assist smaller agencies

Key highlights of this work include:

- workplace inclusivity and accessibility supported by the release of [The Guide to establishing Disability Contact Officers](#), with over half of APS agencies reporting in the 2022 Agency survey they are leaning into the model
- the development of workplace adjustment passports, accessibility hubs and improved mobility for employees with disability, though there is a shortfall around workplace adjustment training
- a refresh of the APSJobs website to enable employees to search for potential opportunities with flexible work arrangements that suit their needs, or search by location to keep them close to support.

One common theme was the difficulties that smaller agencies faced in providing various supports, such as disability awareness and capability uplift training, establishing Disability Contact Officer roles, or establishing diversity networks. This interim evaluation recommends that the APSC undertake further investigations into whether portfolios, the AMD Hub, or other community of practice can assist smaller agencies with either providing mentoring programs or open access to the programs of larger agencies.

An opportunity exists around using the Good Practice Guide and Action Plan materials developed by the Australian Council of Learned Academies in their [Ensuring Occupations are Responsive to People with Disability](#) report. All agencies and departments are urged to use these materials.

Ongoing work is occurring to ensure progress is achieved on the Strategy

Many of the actions related to ensuring progress of the Strategy are ongoing and being monitored by the APSC. Note there is an opportunity to advertise more broadly the collaborative diversity and inclusion activity being done by departments and agencies beyond the Disability Champions Network/SES Disability Network.

Introduction

The [Australian Public Service Disability Employment Strategy 2020-2025](#) (Strategy) aims to increase the employment of people with disability across the APS to 7% by 2025 by undertaking a number of actions across two focus areas:

1. Attraction, recruitment and retention of more people with disability
2. Accessible and inclusive workplace cultures and environments.

It also includes actions specifically for the Australian Public Service Commission (APSC), departments and agencies, and the Senior Executive Service.

Australia's Disability Policy Framework

The Strategy was jointly developed by the Australian Public Service Commission (APSC) and the Department of Social Services (DSS); it supports [Australia's Disability Strategy 2021-2031](#). *Australia's Disability Strategy* is the national disability framework agreed by all governments and sets out a plan for continuing to improve the lives of people with disability in Australia over the next 10 years.

Increasing the employment of people with disability is Policy Priority 1 of the Employment and Financial Security Outcome Area of *Australia's Disability Strategy*. Under *Australia's Disability Strategy* Action 1.7 of the [Employment Targeted Action Plan](#) is to 'implement strategies and plans including, as part of the Strategy, to attract, recruit and retain more people with disability in the APS.' The indicator for Action 1.7 is 7% of employees with disability in the APS employed by 2025.

Also linked to the Employment Targeted Action Plan is *Employ My Ability* – this is an Associated Plan which provides a guiding framework for employers, government and the broader community to increase employment outcomes for people with disability.

Employing people with disability in the public sector and ensuring reasonable accommodation is a general obligation of the Australian Government under the United Nations Convention on the Rights of People with Disability (UNCRDP).² The Guiding Principles of *Australia's Disability Strategy* are based on Article 3 of the UNCRDP.³ Adherence to the Guiding Principles in the final evaluation of the APS Strategy, where applicable, will ensure that the evaluation and any recommendations are in accordance with *Australia's Disability Strategy*, our international obligations, and appropriate for people with disability.

² United Nations Convention on the Rights of People with Disability, Article 4.1.a and Article 27.g "Employ persons with disabilities in the public sector" and Article 27.i "Ensure that reasonable accommodation is provided to persons with disabilities in the workplace"

³ *Australia's Disability Strategy 2021-2031* Guiding Principles are Principle 1: Respect for inherent dignity, individual autonomy, including the freedom to make one's own choices, and independence of persons, Principle 2: Non-discrimination, Principle 3: Full and effective participation and inclusion in society, Principle 4: Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity, Principle 5: Equality of opportunity, Principle 6: Accessibility, Principle 7: Equality of people, Principle 8: Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities.

Purpose and scope

This interim evaluation aims to capture work undertaken by departments or agencies between the Strategy launch in December 2020 to December 2022. The report identifies interim learnings to strengthen or reshape how the APS attracts, recruits and retains people with disability.

Note that direct engagement with employees with disability was not possible in this interim evaluation. Such engagement is planned for the end of Strategy evaluation.

Methodology

This interim evaluation used a mixed-methods approach with the following components.

- A document review of known programs, progress or actions taken by APS departments or agencies to strengthen employment outcomes for people with disability.
- Analysis of data sources including APS Employment Database (APSED), APS Employee Census, Agency Health Check and Stocktake Surveys, and other bespoke data collections related to Affirmative Measures programs.

Discussions with a number of departments or agencies who reported through any of the above sources that they have initiatives, programs or activities underway that have strengthened employment outcomes for people with disability.

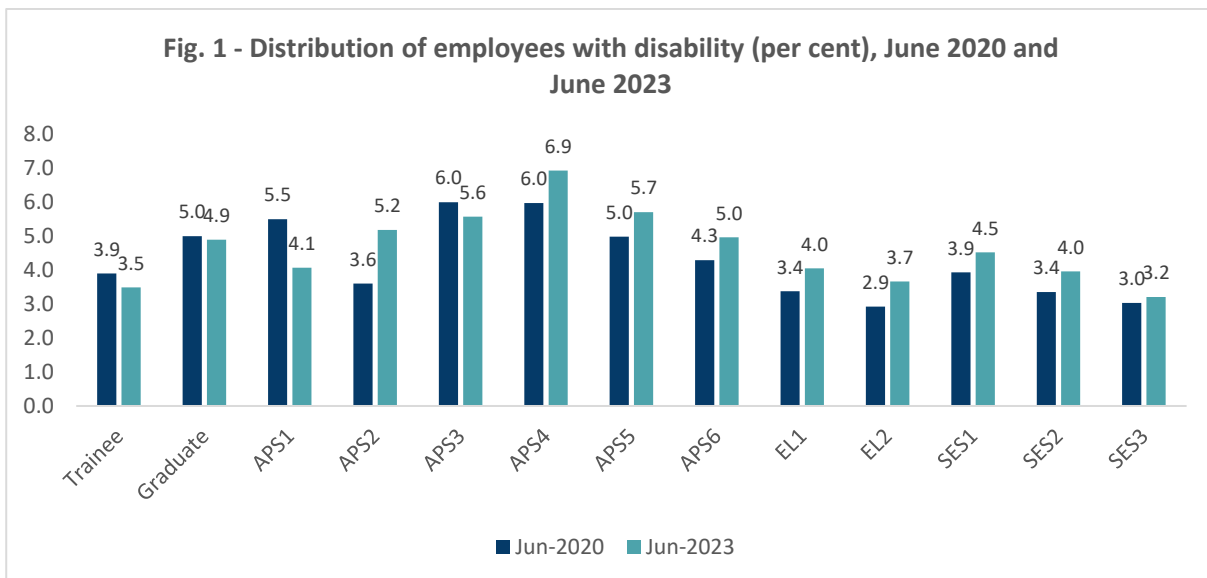
Findings

Overall goal: An improved APS, with 7% employment of people with disability

Finding: The APS’ progress against the 7% employment target for people with disability has been slow and further work is required to overcome barriers to reporting.

In May 2019, the Australian Government committed to a new employment target for people with disability in the APS of 7% by 2025.⁴

As of 30 June 2023, 5.1% of employees were identified as having a disability in the APS Employment Database, which is a collection of information gathered from the human resources systems of APS agencies.⁵ This is an increase from the 4.6% rate in 30 June 2020, and represents an increase of approximately 1,800 employees since then. There is also evidence of increased representation of employees with disability across the majority of classification levels in the last three years, despite a decline in representation among graduates and trainees (Figure 1).⁶



Source: APSED June 2023.

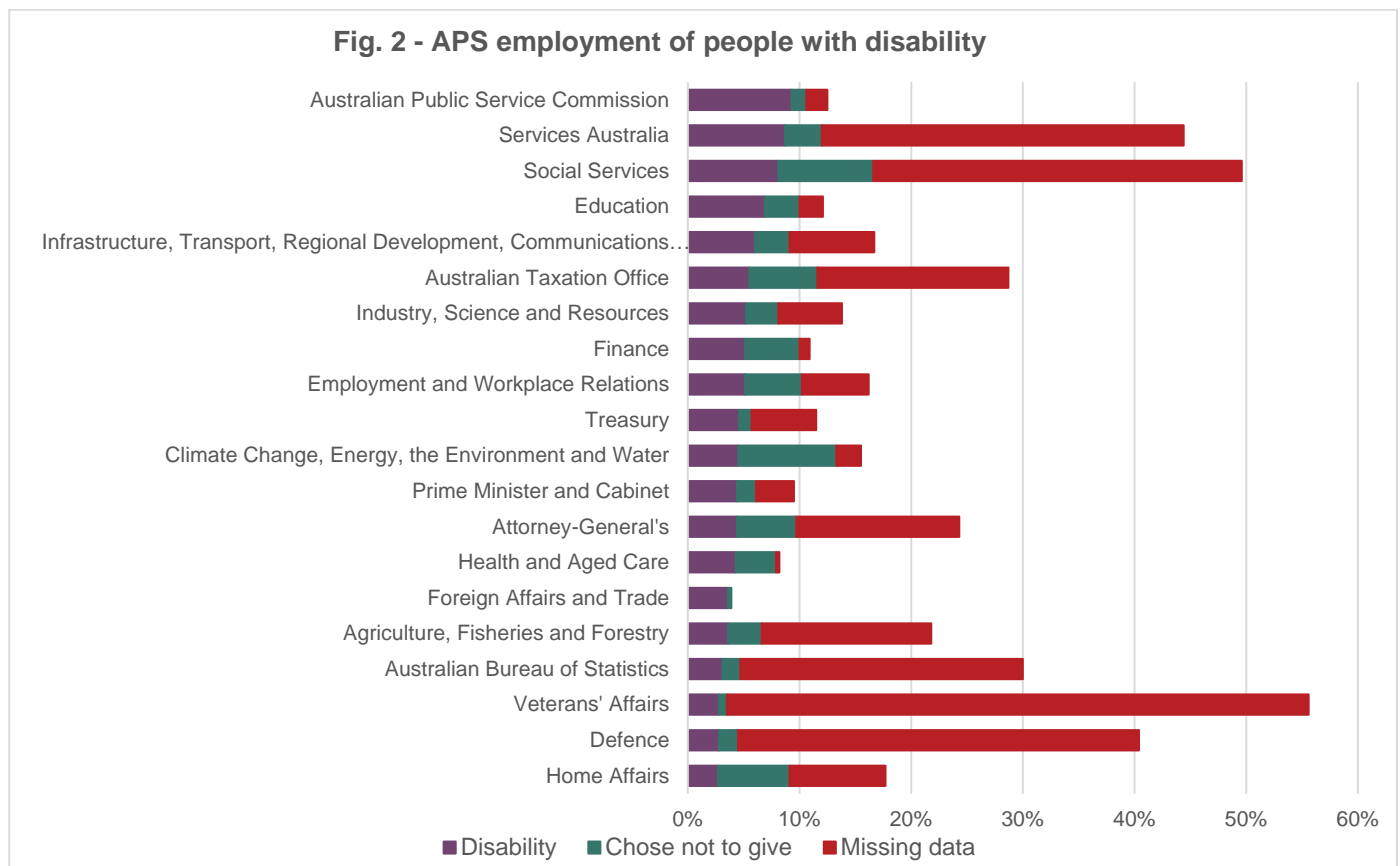
However, there continues to be fewer employees with disability reported to the APS Employment Database compared to the anonymous APS Employee Census, which relies on self-reported data. Data from the 2023 APS Employee Census indicates that 10.9% of staff identify as having a disability. Many agencies have high proportions of missing data for disability because disability status is not a mandatory reporting field. Figure 2 shows the reported disability status of all APS employees in selected agencies. The APS Employee Census data indicates that only 45% of those with a disability had recorded this with their agency and a further 24% were unsure. Therefore at least 30% had not

⁴ Australian Public Service Disability Employment Strategy 2020-2025, p. 5.

⁵ Note that this figure includes in its denominator those staff that choose not to give their disability status information to their agencies, and staff missing disability status information on their records. This calculation approach was used when the Strategy was first established, and so the same methodology is being used in this interim evaluation.

⁶ Based on APSED December 2022 analysis.

recorded their disability status. This shows that the true proportion of employees with a disability in the APS is higher than agency recorded figures.



Source: APSED 30 June 2023.

Key opportunities

A current Department of the Prime Minister and Cabinet Behaviour Economics Team project is seeking to identify opportunities to close the gap between the formal disability figures from HR systems, and the anonymous disability figures obtained through the APS Employee Census. Results will be available towards the end of 2023, and will be promulgated across the APS to inform their own policies and practices.

Enhancing data quality requires ongoing action to address barriers to reporting, such as agencies:

- encouraging employees to update their records to improve and reduce missing data
- articulating to employees the benefit of accurate data, and demonstrating the relevance of this information to their employment
- assuring employees that their reported disability status will remain confidential and not be used by employers in any discriminatory or otherwise negative way
- reviewing HRIS systems and processes to optimise data collection and reporting, and
- bringing the issues to the attention of Disability SES Champions.

Action 1: Develop a whole of Australian government approach to large-scale recruitment, including an expanded use of Affirmative Measures Disability (AMD) for middle management and senior leadership roles.

Finding: A whole of Australian government approach to large-scale recruitment was investigated but considered impractical after discussions by the APSC with agencies. Instead, focus has moved to providing guidance that supports recruitment teams and hiring managers to expand employment opportunities for people with disability.

A whole of Australian government approach to large-scale recruitment was investigated but considered impractical after APSC-led discussions with agencies. The key difficulty was in attracting potential candidates when those candidates could not be told in advance what the specific roles they were applying for would involve; which agency they might be employed by; and what location any such role would be in. There are also significant differences between agencies and their role requirements, footprint, accessibility issues, reasonable adjustments policy, and salary and conditions.

Instead of a whole of Australian government approach to large-scale recruitment, the APSC has focused on providing guidance to support recruitment teams and hiring managers to create compelling recruitment campaigns relevant to their agency; increase their use of affirmative measures (affirmative measure vacancies are open only to people with a disability); and promote more inclusive recruitment.

As part of these efforts, APSC investigation into the different usage of RecruitAbility and the AMD recruitment program revealed:

- an inability for recruitment practitioners to delineate AMD from RecruitAbility,
- different levels of knowledge and confidence in running AMD rounds, and
- being able to form disability aware recruitment panels for AMD rounds.

To address these issues, the APSC delivered the AMD Hub, launched in November 2022, targeting both HR practitioners and hiring managers. The AMD Hub aims to address disability recruitment knowledge and skills gaps for HR practitioners and hiring managers.

In addition, to reach and attract a wider number of people with disability, centralised guidance is being developed to support departments or agencies who wish to advertise suitable positions on The Field. The Field is a disability-led platform that connects job seekers with disability with inclusive organisations. The Field was developed by Dylan's Alcott's Get Skilled Access organisation, and was funded by DSS. Platforms such as the Field are complementary to APSJobs and do not replace the requirement to advertise all jobs on APSJobs.

Key opportunities

As at December 2022, there were 292 members of the AMD Hub. With over 5,000 HR practitioners across the APS, the final evaluation will consider how effective this central resource has been to build confidence and capability to run affirmative measures disability recruitment. It will also consider whether the AMD

Hub has improved the consistency of application of schemes such as RecruitAbility, and whether agencies have adopted more personalised recruitment and assessment processes (such as job trials) as suggested by the Strategy.

In addition, a range of targeted recruitment programs focused on expanding employment opportunities for people with disability have been undertaken since the Strategy began.

One of these programs is the 12-month Ability Apprenticeship Program (AAP) pilot led by DSS, providing an alternative entry pathway for people with disability, who may not meet the Graduate Program criteria. The AAP is centrally funded by DSS and provides participants with on the job and formal training, as well as support from a disability employment provider. Participants commence the program at the APS 3 level and advance to an APS 4 level upon completion. The 2022 program ceased in April 2023, with 10 centrally-funded positions and 6 positions funded by different DSS work areas. On the success of this pilot to date, DSS have funded an AAP 23/24 program with 10 positions.

The evaluation also identified a number of departments or agencies that have been doing some innovative work to strengthen targeted recruitment practices. Two of these programs offer opportunities for people who identify as neurodivergent to demonstrate their skills and experience through non-traditional assessments initiatives.⁷

The Aurora Neurodiversity Program led by Services Australia in partnership with Specialisterne Australia, provides people with autism a targeted entry pathway into Information Technology (IT), data analytics, program or project work.⁸ The recruitment approach replaces formal recruitment interviews with more hands-on assessment processes that encourages people diagnosed with autism to practically demonstrate their knowledge and skills.

The Dandelion Program led by the Department of Home Affairs in partnership with DXC Technology, also provides people who are neurodivergent with a targeted entry pathway into an Information and Communication Technology (ICT) career.⁹ The program aims to create a talent pipeline for filling junior technical ICT roles across the department, and provides a supportive learning environment where employees can gain certifications, and can choose to pursue permanent positions in the APS or externally.

The end of Strategy evaluation will discuss these initiatives with program providers to ascertain:

- satisfaction feedback on the recruitment process and training program from participants,
- challenges faced by tailored recruitment programs (and strategies to overcome these challenges),
- long term retention of employees engaged through these program, and

⁷ Better Up (2022) Neurodiversity can include Autism Spectrum Disorder, Attention Deficit Hyperactivity Disorder, Dyslexia, Dyspraxia and other learning disabilities. [Types of Neurodiversity: Understanding How People See The World \(betterup.com\)](https://www.betterup.com/types-of-neurodiversity-understanding-how-people-see-the-world/)

⁸ [Aurora Program](#)

⁹ The Home Affairs Dandelion Program was a finalist in the 2022 Institute of Public Administration learning awards. We note there is work underway to develop a new 'Apollo' program, which can be assessed in the final evaluation.

- the scalability of these programs across the APS.

Action 2: As a part of broader APS reform work, develop APS wide branding and an employee value proposition that enables the promotion of the APS as an employer of choice for people with disability. Actively seek out skilled and talented people with disability.

Finding: Work is underway that will consider how the APS value proposition supports diversity and inclusion in the APS.

Work is underway through the Secretaries Board Sub-committee on the Future of Work to strengthen the value proposition of the APS in the employment market and to develop effective communications to promote the APS as an employer of choice. This includes work to consider how the value proposition supports diversity and inclusion in the APS.

This work seeks to improve elements of the value proposition such as development of an APS-wide approach to flexible work, and the development of an APS location strategy, to support property planning and location decisions that meet the needs and expectations of employees, including people with a disability.

Key opportunities

As APS EVP communications are developed throughout 2023 further work is planned to better understand the drivers of attraction and retention for employees with a disability and to tailor communications as appropriate.

Finding: Work is underway to develop a disability EVP tool to help the APS actively seek out skilled and talented people with disability, as well as improve the APSJobs website, and develop centralised guidance to support departments or agencies who wish to advertise suitable positions on The Field (a disability-led platform that connects job seekers with disability with inclusive organisations).

Discussions are underway in the APSC to develop a bespoke employee value proposition (EVP) tool to be used by HR practitioners or hiring managers to tailor job descriptions for people with disability. Similar to the First Nations EVP tool located in the Affirmative Measures Indigenous Hub, the disability EVP tool will be hosted through the Affirmative Measure Disability Recruitment Hub (the AMD Hub). More details on the AMD Hub are available under Action 1 above.

In addition:

- The APSJobs website (the primary centralised portal where all APS jobs are advertised) has been updated to make it easier for people to search for roles by location and by office arrangement (work from home, onsite or flexible). Furthermore, it has been enhanced with a temporary jobs portal to encourage mobility.

- As outlined under Action 1 above, to reach and attract a wider number of people with disability, centralised guidance is being developed to support departments or agencies who wish to advertise suitable positions on The Field.

Key opportunities

See the key opportunities listed under Action 1 above.

Action 3: Departments or agencies to work with the Australian Public Service Commission to conduct a review of recruitment practices (including the application of Affirmative measures) to ensure alignment with contemporary and inclusive practices.

Finding: Progress has been made in modernising recruitment systems and practices and uplifting the capability of recruiters in the APS to better attract employees with a disability.

As discussed under Action 1, a range of targeted recruitment programs that are focused on expanding employment opportunities for people with disability have been undertaken since the Strategy began. In addition, the APSC delivered the AMD Hub, which aims to address disability recruitment knowledge and skills gaps for HR practitioners and hiring managers; and will be providing guidance for agencies to utilise The Field, a new accessible recruitment platform developed to support people with disability.

Key opportunities

Hosting the disability EVP tool on the AMD Hub will enable departments or agencies to consistently tailor their job advertisements for people with disability.

Action 4: Agencies to provide disability awareness and capability uplift for managers and senior leaders.

Finding: Evidence collected to date suggests some awareness and training measures focused on managers and senior leaders has occurred. However, there is an opportunity to do more through using Good Practice Guide and Action Plan materials developed by the Australian Council of Learned Academies in their Ensuring Occupations are Responsive to People with Disability report.

A 2021 Agency Health Check Survey found a number of activities or programs were being used across the APS to uplift disability awareness and capability for managers and supervisors.¹⁰

- The Australian Taxation Office improved its learning solutions to improve disability awareness for staff and managers with a focus on neurodiversity.

¹⁰ Diversity and Inclusion Health Check 2021.

- The Clean Energy Regulator had an alliance with the Australian Network on Disability to deliver disability awareness training to its managers and staff.
- The then Department of Agriculture, Water and the Environment provided disability awareness training for all managers and senior leaders.
- The Department of Finance focused on manager capability uplift by embedding disability confidence training into induction and onboarding processes.
- The Department of Industry, Science, Energy and Resources supported its Disability and Wellness Network (DaWN) to facilitate two Disability Dialogue sessions this year, modelled off the APSC's 10 plus 10 events. These sessions aimed to increase management awareness about disability and enabled EL2/SES leaders and their Secretary to hear lived experience stories from employees with disability.
- The Department of Veterans' Affairs updated its 'Accessibility Hub' intranet site with resources and guidance for staff who manage people with a disability.

In addition, a 2022 Agency Stocktake Survey found that 60% of agencies who responded (36/59 responses) offered disability awareness training to all employees.¹¹

Key opportunities

While some agencies report providing disability awareness and capability uplift for managers and senior leaders, further work can be done through using the Good Practice Guide and Action Plan materials developed by the Australian Council of Learned Academies (ACOLA) below.

Disability Responsiveness under Australia's Disability Strategy 2021-2031

To progress action under Australia's Disability Strategy's Community Attitudes Targeted Action Plan (TAP), DSS engaged the ACOLA to independently review and provide advice on the adequacy of training about disability in Australia, with a particular focus on occupations within health, education, justice, and social and community services sectors.

On 29 October 2022, ACOLA published the report entitled [Ensuring Occupations are Responsive to People with Disability](#) finding that there are gaps in education and training around disability confidence (or as they refer to it in the report, 'disability responsiveness') in these sectors. To address these gaps, ACOLA's report provides both a good practice guideline and action plan, which government, sectors and employers can use to become disability responsive. The Australian Government is encouraging all relevant stakeholders to use the good practice guidelines and the action plan.

Noting the ACOLA Report's Good Practice Guide and Action Plan targets occupations, the recommendations should be applied across a broad range of settings, including in the APS.

¹¹ 59 agencies responded: Diversity and Inclusion APS Agency Stocktake May 2022.

Action 5: Departments or agencies to implement the disability liaison officer model to support employees with disability.

Finding: In 2022, around half of APS departments and agencies either have disability contact officers or intend to establish them. Small and extra small departments and agencies are more likely not to have DCOs nor the intention to establish them. APSC-created tools are available to help alleviate the lack of DCOs in these agencies.

Disability Contact Officers (DCOs) provide a knowledgeable point of contact for employees with disability, their managers and colleagues to navigate systems and access support in the APS. DCOs aim to improve the way an employee with disability, their managers and colleagues can get information and resources on accessibility and other services.

In 2021, the APSC released *The Guide to establishing Disability Contact Officers*, which lists the key actions departments or agencies need to adopt to implement the DCO model.¹² Recognising the different context and needs entities across the APS, departments or agencies can select and adopt the actions to meet their needs. The 2022 Agency Survey identified 53 departments or agencies either have DCO's or are in the process of establishing these positions. The remaining 44 departments or agencies do not intend to establish a DCO.

Agency adoption of DCOs was influenced by agency size:

- All extra-large, 85% of large and 54% of medium departments or agencies reported having DCOs or are in the process of establishing these positions.
- 56% of small and 70% of extra small agencies reported they do not have DCOs and do not intend to establish these positions at the time at the survey.¹³

Key opportunities

Close to 50% of the departments or agencies without DCOs have stated their small size and/or the current absence of staff with disability as reasons for not currently having or intending to have DCOs. These departments and agencies could benefit from the activities the APSC has been undertaking to promote discussion and knowledge sharing.

- The APSC has created a channel in the Diversity and Inclusion Discussion Forum on GovTEAMS to encourage sharing of agency DCO roles and guidance. Agencies can post questions, jobs, and also share guidance to other agencies.
- The APSC also shares case studies and lessons learned through the APS Diversity and Inclusion Newsletter and the APS Diversity and Inclusion Discussion Forum. Feedback gained from engagements with agencies has also been used to inform webinars and guidance.

¹² This has been done in lieu of creating a DCO network, which due to resourcing constraints has not been created yet by the APSC.

¹³ For more information on agency sizes, see [APS Agencies – size and function | Australian Public Service Commission \(apsc.gov.au\)](#).

Promotion of these tools across the service will be continued by the APSC.

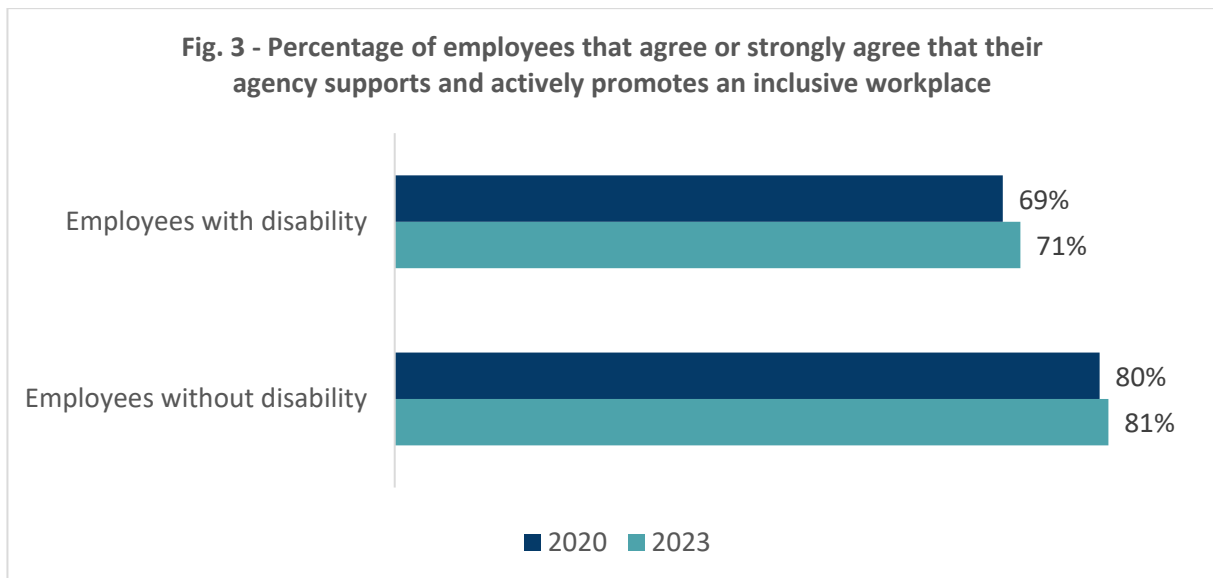
Action 6: Improve disability awareness and confidence to create an inclusive culture.

Finding: There is activity across the APS to improve disability awareness and confidence, however employees with disability report less agreement to the statement that their agency “supports and actively promotes an inclusive workplace”. Small to medium sized agencies also tend not to have disability or general diversity and inclusion networks.

This interim evaluation found a number of external programs or tools departments or agencies use to improve disability awareness and confidence, including:

- disability confidence training
- using the Australian Network on Disability *Access and Inclusion Index* assessment
- engagement with *AccessibilityOz* to improve agency digital accessibility.¹⁴

The 2020 and 2023 Employee Census found that most employees feel their agency supports and actively promotes an inclusive workplace (Figure 3). However, the proportion of employees that agreed or strongly agreed is lower for employees with disability.



Source: 2020 APS Employee Census; 2023 APS Employee Census.

The 2021 Agency Survey captured information about agency employee networks, with 46% of departments or agencies reporting they had no dedicated disability or general diversity and inclusion networks available for employees. The size of the agency influenced this result. All extra-large

¹⁴ Diversity and Inclusion Health Check 2021.

departments or agencies and just under 90% of large departments or agencies offer networks compared to less than 20% of medium/small agencies.¹⁵

Key opportunities

As part of the final evaluation of the Strategy the APSC will investigate:

- the possible drivers of why employees with disability may be reporting less agreement to the statement that their agency supports and actively promotes an inclusive workplace
- whether there is a case for providing further assistance to small to medium sized agencies to set up disability or general diversity and inclusion networks.

Action 7: Agencies to review business practices to include workplace adjustments and to embed conversations about workplace adjustments into all stages of the employee lifecycle.

Finding: There is evidence of agencies reviewing business practices to include workplace adjustments, though more workplace adjustments training could be provided. It is also unclear if proactive conversations about workplace adjustments are occurring before an employee starts.

Some employees with disabilities may face barriers at work because of some features of their work environment which could readily be altered. Australia's Disability Strategy 2021-2031 contains Guiding Principles on Accessibility and Non-discrimination. The *Disability Discrimination Act 1992* (Cth) provides that direct and indirect discrimination on the basis of disability is unlawful in employment.

Altering the work environment to eliminate barriers is commonly referred to as reasonable or workplace adjustments. Where reasonable adjustments are not provided this can constitute unlawful indirect discrimination. Examples of adjustments include:

- changing recruitment and selection procedures
- modifying work premises
- changing job design, work schedules or other work practices
- modifying equipment
- providing training or other assistance.

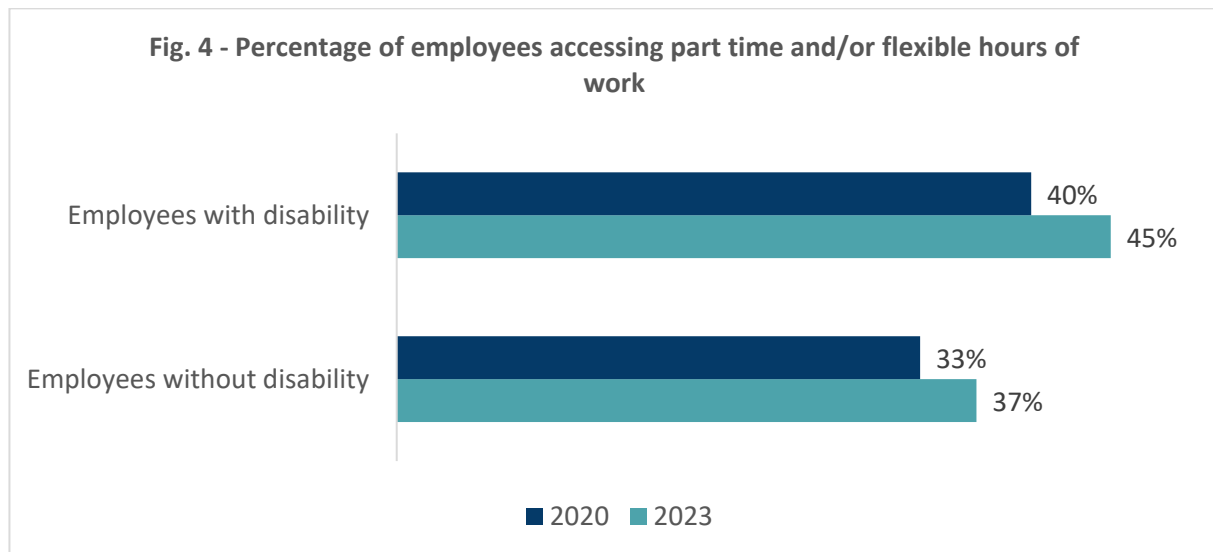
Safe and inclusive workplaces includes the ability for employees to request workplace adjustments that will enable them to perform their duties. The 2022 Agency Stocktake Survey identified only 16 of 59 responding departments or agencies provide workplace adjustments training to employees.¹⁶

¹⁵ For more information on agency sizes, see [APS Agencies – size and function | Australian Public Service Commission \(apsc.gov.au\)](https://www.apsc.gov.au/aps-agencies-size-and-function).

¹⁶ Diversity and Inclusion APS Agency Stocktake May 2022.

Larger departments or agencies are more likely to offer training, with 75% extra-large departments and 26% of medium/large departments or agencies indicating they offered workplace adjustment training, compared to only 13% of micro, extra-small, and small agencies.¹⁷

Workplace flexibility is key to supporting employees with disability. The majority of departments or agencies in the 2021 Agency Survey report having flexible or remote working policies. Employees with disability are more likely to access part time and/or flexible hours of work (45% vs. 37%).¹⁸ Potentially driven by changes to work practices since the start of the COVID-19 pandemic, both groups reported an increase in accessing part time and/or flexible hours of work (Figure 4) over the past two years.



Source: 2020 APS Employee Census; 2023 APS Employee Census.

Appropriate accessible technology can empower employees to undertake their work duties independently, efficiently and with dignity, and may prevent impairments and secondary health conditions.¹⁹ The following are examples of agency actions to incorporate workplace adjustments at different stages of the employee lifecycle.

- The Department of Home Affairs 2021 ICT graduate cohort, together with the department’s culture, diversity and inclusion and information technology areas, developed an Assistive Technology Support Hub. This hub contains information on the assistive technology available to staff and provides centralised guidance on how to request and use the technology.
- The NDIS Quality and Safeguard Commission became a member of the Australian Network on Disability, and had job advertisements reviewed to ensure that the language was inclusive for applicants with disability.
- Some departments or agencies consulted during this evaluation have introduced Reasonable Adjustment Passports as a part of their business practices. Furthermore, the SES Disability Network has also discussed passports and potential for a whole-of-APS passport. The Reasonable

¹⁷ Diversity and Inclusion APS Agency Stocktake May 2022.

¹⁸ 2023 APS Employee Census.

¹⁹ <https://includeability.gov.au/resources-employers/creating-accessible-and-inclusive-workplace>

Adjustments Passport serves as a starting point for an individual to have a conversation with their supervisor and the agency's HR area about reasonable adjustments required. Employees can complete the passport at any time during their employment and choose who they share the passport with, including their supervisor. The passports are agency specific with employees using the passport when they move within the agency.

Key opportunities

As part of the final evaluation of the Strategy the APSC will investigate:

- why only 16 of 59 responding departments or agencies provided workplace adjustments training to employees in 2022
- if proactive conversations about workplace adjustments are occurring before an employee starts
- whether workplace adjustment passports are being seen as effective by people with disability working in the APS.

Action 8: Ensure employees with disability are supported and encouraged to take up mobility and career development opportunities.

Finding: There is evidence of agencies supporting and encouraging employees with disability to take up mobility and career development opportunities, however employees with disability report having less access to formal and informal learning and development opportunities compared to employees without disability, and smaller agencies appear to struggle to provide mentoring programs because of their size.

Overall, 20% of employees with and without disability made a temporary move in 2022.²⁰

Nonetheless, to undertake this action, the Strategy suggests:

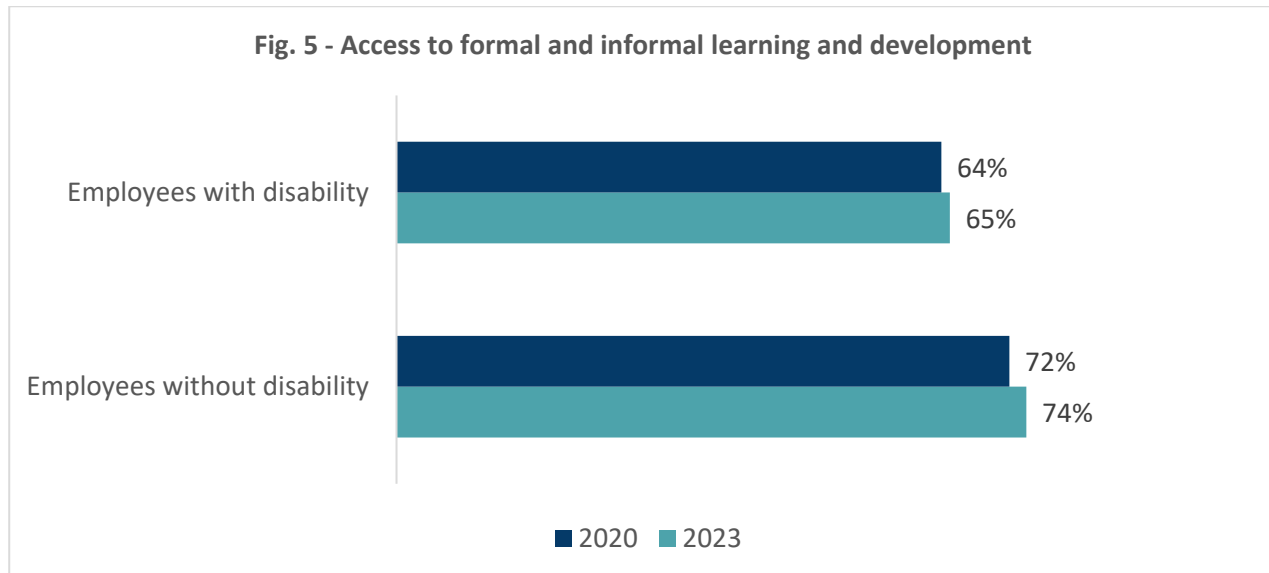
1. Career development support for employees with disability, including through mentors, coaches, mobility opportunities, and employee networks
2. Professional development and talent management programs should actively include employees with disability.²¹

Regarding career development support, the 2022 Agency Survey identified departments or agencies offer both formal and informal mentoring programs to employees. As with the other data already reported, the trend is that larger departments or agencies offer programs, and smaller departments or agencies indicate they are not able to due to resourcing and size.

²⁰ 2022 APS Employee Census.

²¹ Australian Public Service Disability Employment Strategy 2020-2025, pp. 21-22.

Regarding professional development and talent management programs, 65% of employees with disability agreed they were able to access formal and informal learning and development opportunities in 2023, only slightly up from 64% in 2020.²² This was still lower than employees without disability (Figure 5).



Source: 2020 APS Employee Census; 2023 APS Employee Census.

Key opportunities

As part of the final evaluation of the Strategy the APSC will investigate:

- the possible drivers behind why employees with disability report having less access to formal and informal learning and development compared to employees without disability
- whether portfolios, the AMD Hub, or other community of practice can assist smaller agencies with either providing mentoring programs or open access to the programs of larger agencies.

Action 9: Agencies to ensure all internal and external products and services are accessible.

Finding: Work on this action is ongoing, and will be formally assessed as part of the final evaluation of the Strategy.

This action is focused on:

- addressing and preventing issues with workplace design and systemic barriers to the use of assistive technology
- accessibility requirements for working from home arrangements for people with disability

²² 2020 APS Employee Census and 2022 APS Employee Census.

- consideration of flexible working hours
- all employees having access to information and training on accessibility
- APS employees being able to recognise when a product or service is not accessible.²³

Note that while the projected due date for delivery of this item is 2023,²⁴ the following observations can be made:

- Reasonable adjustments and assistive technology are covered under Action 7.
- Accessibility requirements for working from home arrangements for people with disability, and consideration of flexible working hours, appears to have occurred due to agency responses to the Covid-19 pandemic but will need to be formally assessed.²⁵
- Access to information and training and accessibility will need to be formally assessed.
- APS employees being able to recognise when a product or service is not accessible will need to be formally assessed.

Note also that:

- *Australia's Disability Strategy 2021-2031* contains a Guiding Principle on accessibility including prompting questions that refer to universal design.
- The *APS Style Manual* has a dedicated section to Accessible and Inclusive Content. Digital Service Standard that applies to all Government departments and agencies also has standards around minimum levels of accessibility.²⁶

Key opportunities

Formal assessment of this action will be undertaken for the final evaluation of the Strategy.

Action 10: Audit of existing Australian Government owned and rented premises for their current levels of accessibility.

Finding: The Department of Finance and APSC have reduced the scope of this action. An audit of 27 properties encompassing a tenancy from each of the departments of state and large agencies is underway. The Australian Network on Disability will be supporting the Department of Finance and departments or agencies to complete the audits.

²³ *Australian Public Service Disability Employment Strategy 2020-2025*, p. 22.

²⁴ *Australian Public Service Disability Employment Strategy 2020-2025*, p. 34.

²⁵ Based on agency responses to the Diversity and Inclusion Health Check 2021.

²⁶ <https://www.dta.gov.au/help-and-advice/digital-service-standard/digital-service-standard-criteria/9-make-it-accessible>

The Department of Finance and APSC have reduced the scope of this action, accepting that all buildings receive required certification and approvals under jurisdictional legislation prior to becoming operational. An audit of 27 properties encompassing a tenancy from each of the departments of state and large agencies is underway. The Australian Network on Disability will be supporting the Department of Finance and departments or agencies to complete the audits. This will provide a sufficient level of data and information to identify common accessibility barriers across the APS, and will enable the Department of Finance to identify whole of government opportunities to improve accessibility across the APS.

Key opportunities

The findings of the audit into accessibility will identify common accessibility barriers across the APS, which all APS can use in the future. These findings will be incorporated into the Strategy's final evaluation report.

Action 11: Collaborate to share assistive technology and equipment across APS departments or agencies and digital environments.

Finding: Though this action is due for delivery in 2023, evidence of work undertaken to collaborate to share assistive technology and equipment across APS departments or agencies and digital environments is so far limited.

Evidence of work undertaken to collaborate to share assistive technology and equipment across APS departments or agencies and digital environments is limited. The Department of Home Affairs is however leading a virtual Cross-agency Assistive Technology Network. This network aims to provide participants the opportunity to share and learn about accessible software and hardware, roadblocks to effective accessible technology and solutions and support arrangements for assistive technology.

Key opportunities

The Cross-agency Assistive Technology Network is a promising opportunity that could support the improved sharing of assistive technology and equipment across the APS.

Action 12: Agencies must consider accessibility when procuring goods and services.

Finding: Work on this action is ongoing, and will be formally assessed as part of the final evaluation of the Strategy.

The Department of Finance is undertaking work on this item, which is due in 2023.

Key opportunities

The APSC will continue to monitor the progress of this work. Formal assessment of this action will be undertaken for the final evaluation of the Strategy.

Action 13: Monitor and report progress.

Finding: Work on this action is ongoing, and will be formally assessed as part of the final evaluation of the Strategy.

As part of this action, the Strategy suggests agencies:

- improve inclusion of people with disability by addressing their culture, recruitment and employee experience
- develop additional measurements, both quantitative and qualitative, to assist in monitoring improvement
- report to the Secretaries Board and other governance bodies on portfolio measures of success.

This action is ongoing through 2023.

Key opportunities

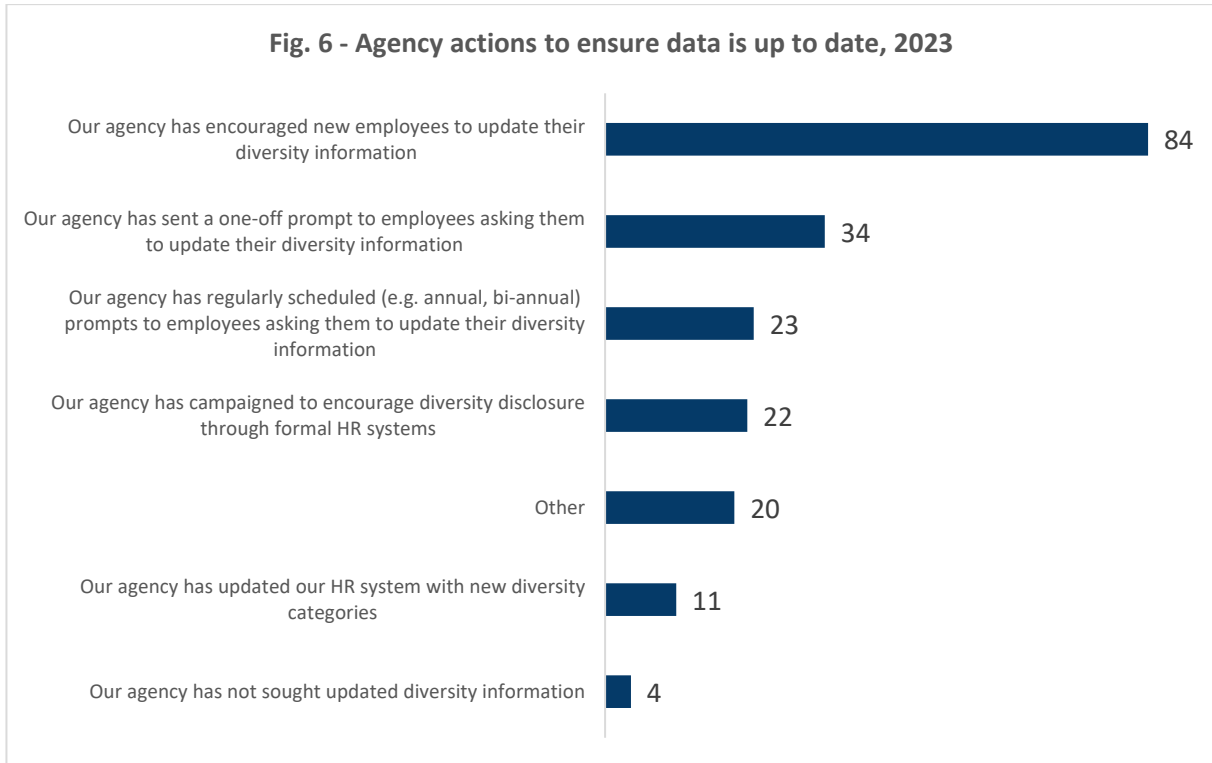
The APSC will continue to monitor the progress of this work. Formal assessment of this action will be undertaken for the final evaluation of the Strategy.

Action 14: Build a clear understanding across the APS of the benefits of sharing and updating disability status in HR systems. Monitor and report on reported levels and their links to culture, accessibility and job satisfaction.

Finding: There is a difference between reporting of disability to HR systems compared to the anonymous APS Employee Census. An APSC and Behavioural Economics Team of the Australian Government project is examining why, and its outcomes will enable departments and agencies access to centralised guidance, allowing them to strengthen how they onboard people with disability, and encourage more employees to share their disability status.

Agencies are taking action to ensure their HR diversity data is up to date, in particular by encouraging new employees to update their diversity information (Figure 6).

Fig. 6 - Agency actions to ensure data is up to date, 2023

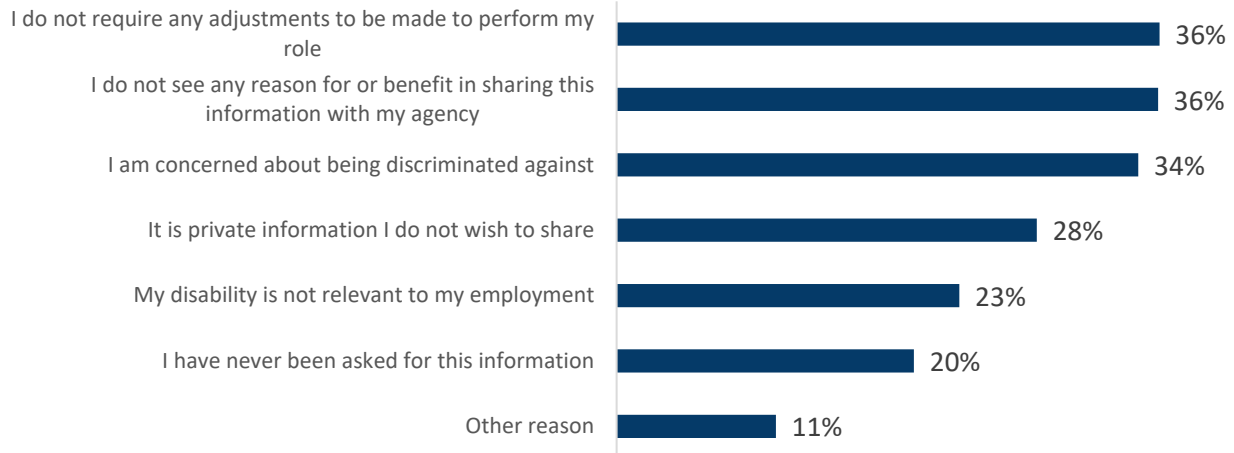


Source: 2023 APS Agency Survey.

However, there are still many agencies who have a large proportion of employees who have not provided any data on their disability status (see Figure 2). For example, there are high proportions of missing data at the Australian Bureau of Statistics (52%), Department of Defence (36%), Department of Social Services (33%) and Services Australia (32%).

There is still a substantial difference between disclosure in an agency’s HR system and disclosure in the anonymous APS Employee Census. The 2023 APS Employee Census sought to better understand why 30% or more respondents were not recording their disability status through HR systems. The most common reasons employees reported were not requiring adjustments to perform their role, not seeing a reason or benefit in sharing this information, and concerns about being discriminated against (Figure 7).

Fig. 7 - Reason ongoing disability not recorded in agency system



Source: 2023 APS Employee Census.

To explore disclosing disability status further, the APSC is working with the Behavioural Economics Team of the Australian Government (BETA) at the Department of Prime Minister and Cabinet to identify options to increase staff recording their disability in HR systems.

As part of the project, BETA worked with a subset of departments or agencies of varying size to discover how their collection of this information works. The team discovered a number of issues. Most commonly, employees were asked to disclose their disability status without knowing how their data would be used. Many employees were asked to disclose upon commencement with the agency when they did not really understand the culture of the agency and if it was safe to disclose. Finally, employees reported no real benefits of identifying as a person with disability.

Following the discovery phase, BETA team will be looking at products that could be designed and tested to determine if they increase disclosure when on boarding new employees. Given many staff will acquire a disability while in their agency, future work will be needed to design and test products to increase disclosure after on boarding.

Key opportunities

The BETA project's outcomes will enable departments and agencies access to centralised guidance, allowing them to strengthen how they onboard people with disability, and encourage more employees to share their disability status.

The SES Disability Champions Network will be used as an avenue of awareness raising within agencies the issue of the high proportion of 'missing' data in their HR systems.

Action 15: Build a partnership with the Australian Human Rights Commission to identify, support and enhance good practice.

Finding: Work on this action is ongoing, and will be formally assessed as part of the final evaluation of the Strategy.

The APSC has been regularly meeting with the Australian Human Rights Commission, and work is ongoing to build this partnership.

Key opportunities

Formal assessment of this action will be undertaken for the final evaluation of the Strategy.

Action 16: Agencies to collaborate to develop and share exemplary initiatives and innovative practices.

Finding: Almost all departments or agencies engage in collaborative diversity and inclusion activity. However, transparency of this work is not clear beyond the Disability Champions Network/SES Disability Network. The APSC is building forums and networks, and partnering with agencies, to share this knowledge. Work on this action will be formally assessed as part of the final evaluation of the Strategy.

Overall, there is evidence of almost all departments or agencies engaging in collaborative diversity and inclusion activity. However, transparency of this work is not clear beyond the Disability Champions Network/SES Disability Network.

This action also suggested that the APSC:

- work with agencies to increase collaboration and the sharing of experience, and support the development of networks within and across portfolios
- work with agencies to draw on knowledge, expertise and experience across the system, identifying partner agencies to develop, lead or deliver initiatives
- establish forums and mechanisms to share good practice including people with disability from the public sector, private sector, industry and academic institutions.

The APSC is undertaking the above work in an ongoing fashion. Current work includes:

- producing the APS Diversity & Inclusion (D&I) Newsletter, including encouraging agencies to share case studies
- D&I Webinars, with two held to date on the Disability Contact Officer model and Inclusive Recruitment
- APS D&I Discussion Forum, an MS Teams chat platform on MS Teams/GovTEAMS
- a Sharepoint page linked to the above MS Teams/GovTEAMS forum, which is being developed to allow the sharing of webinars and other information
- sharing information through the Disability Champions Network and the SES Disability Network

- attending and promoting the Public Sector Neurodiversity Community of Practice
- representing the APS on the IncludeAbility Employer Network, which includes both private and public sector representatives
- working with DSS in regards to the Australia’s Disability Strategy and synergies with APS products
- working with the Department of Finance on a dignified access review and resulting artefacts to share with agencies
- working with the Behavioural Economics Team of the Australian Government on a disability identification project.

Key opportunities

Formal assessment of this action will be undertaken for the final evaluation of the Strategy.

Action 17: All Head of departments and agencies will be accountable for implementing the Strategy and taking actions to support the key areas of the Strategy.

Finding: Work on this action is ongoing, and will be formally assessed as part of the final evaluation of the Strategy.

Heads of department and agencies remain accountable for implementing the Strategy.

This action also suggests that Agency Head Agreements will include Key Performance Indicators as part of their agency’s commitment to a disability confident and inclusive workforce. This will be assessed as part of the final evaluation of the Strategy.

APS agencies are also committed to develop their own strategies and action plans to guide their work in relation to strengthening representation and employment outcomes for people with disability. In addition to the APS-wide Disability Employment Strategy, almost 70% of APS agencies have either an overarching inclusion/diversity or a disability-specific Strategy or policy, with 49% also having an overarching inclusion/diversity or a disability specific action plan.²⁷

Key opportunities

Formal assessment of this action will be undertaken for the final evaluation of the Strategy.

Action 18: Disability Champions are to promote and drive implementation of the Strategy within their agency and collaborate APS-wide through the APS Disability Champions Network.

Finding: Work on this action is ongoing, and will be formally assessed as part of the final evaluation of the Strategy.

²⁷ 2021 APS Agency Survey.

The Disability Champions Network (DCN) meets quarterly to share agency work and discuss specific issues facing employees with disability. The December 2022 meeting theme was neurodiversity, with Services Australia presenting on their Aurora Program, and included messaging on how this program might be replicated in other agencies. The DCN maintains close links with DSS who are the lead agency for *Australia's Disability Strategy 2021-2031*. The Network also works closely with the Australian Human Rights Commission to discuss outcomes from disability roundtables or obtain updates on AHRC-led resources such as *Guidelines for the targeted recruitment of people with disability 2022*.

The SES Disability Network (SDN) was established in December 2021 and aims to bring together senior leaders who have disability to network, advise on and promote strategy actions. The SDN is sharing information on initiatives and actions to strengthen recruitment and retention of people with disability across agencies.

Key opportunities

Formal assessment of this action will be undertaken for the final evaluation of the Strategy.