

2022

Review DAAWS to Strengthen Australian Apprenticeships for people with disability



MADN

Melbourne Apprenticeship Disability Network

Executive Summary

One in six Australians live with disability (AIHW, 2022), while less than one in 29 disclose a disability when registering an Australian Apprenticeship or Traineeship (AA) (AIHW, 2021). The Australian Government's response to this has been the Disabled Australian Apprentice Wage Support (DAAWS) program. DAAWS is designed to incentivise employers to apprentice people with disability and provide funding for disability support in off-the-job components of the disabled apprentice's education.

This document identifies the issues being faced by Australian Apprentices and Trainees (AAs), their employers and the people and institutions who support them in securing assistance through the DAAWS program. The report has been prepared by the Melbourne Apprenticeship Disability Network; a group of stakeholders representing 45 apprenticeship and disability organisations including Australian Apprenticeship Support Networks, Group Training Organisations, industry groups, TAFE and Registered Training Organisations, Disability Advocacy groups, Disability Employment Services and more. Recommendations from the stakeholders themselves are provided, with an aim of strengthening AA opportunities for people with disability in Australia.

Stakeholder's key concerns include:

- Fear of the implications of disclosing disability in the workplace
- Lack of awareness of the program and eligibility
- Unclear and difficult to navigate application process
- Weight of "proving" disability to access support
- Administrative burden on all stakeholders
- Confusion regarding incentivising employers and providing off-the-job support
- Timeliness of financial and educational supports
- Lack of collaborative approach to supporting disabled AAs

This report's key finding is that the Australian Government must conduct a public review of the DAAWS program to validate and gain a deeper understanding of the concerns raised by the scheme's stakeholders. As part of this inquiry, this report advocates for the investigation of the following recommendations:

1. Improve disability confidence of the sector
2. Improve access to information about DAAWS
3. Simplify the DAAWS application process
4. Uncouple employer incentive from tutorial and mentor supports
5. Identify appropriate responsibilities and provide disability awareness training
6. Improve collaboration for sharing of disability information in the sector
7. Increase transparency around usage of DAAWS

As the Australian Government actively works towards building a pipeline of skilled workers to support sustained economic recovery (Department of Education, Skills and Employment, 2022), it is imperative that apprentices living with disability are effectively supported to participate in Australian Apprenticeships and Traineeships.

Note on language used in this report

'Disabled person/people' and 'Person/People with a Disability' are used interchangeably in this document. El Gibbs, a writer and activist with a focus on disability and social issues wrote:

“The fight for disability rights is about us having more power to decide about what happens in our lives, and that includes the right to call ourselves by our preferred language. For some disabled people, that is person with disability, for others, it’s disabled person. That is our right to use the language we prefer, and your responsibility, as a non-disabled person, to use that preferred language.”

Acknowledgement

This report was developed on the lands of the Wurundjeri people of the Kulin Nations. We wish to pay our respects to their elders past, present, and emerging. We want to recognise the strength, resilience, and pride of Aboriginal and Torres Strait Islander people.

Author

This paper has been prepared by Amii Demanuele, National Disability Coordination Officer for Eastern Metropolitan Melbourne. Amii co-convenes the Melbourne Apprenticeship Disability Network and acknowledges the valuable contributions of this network’s members. This paper is a culmination of the knowledge, skill and experiences of this dedicated group of apprenticeship stakeholders.

Disclaimer

The views expressed in this paper do not necessarily reflect the views of the Australian Government.



Introduction

One in six Australians live with disability, while less than one in 29 disclose a disability when registering an Australian Apprenticeship or Traineeship (AA) (AIHW, 2021). The Australian Government's response to this has been the Disabled Australian Apprentice Wage Support (DAAWS) program. While numbers of AA disability disclosures have increased steadily over time; 1.5% of all apprentices in 2008 (Cotton, 2010) to 3.4% in 2021 (AIHW, 2021), there remains a discrepancy. Considerable difficulties navigating the DAAWS program experienced by AA stakeholders serve to exacerbate this issue.

As the Australian Government actively works towards building a pipeline of skilled workers to support sustained economic recovery (Department of Education, Skills and Employment, 2022), it is imperative that apprentices living with disability are effectively supported to participate in Australian Apprenticeships and Traineeships.

This document will provide insight into the issues being faced by Australian Apprentices and Trainees (AAs), their employers and the people and institutions who support them in securing assistance through the DAAWS program. Recommendations from the stakeholders themselves will be provided, with an aim to strengthening AA opportunities for people with disability in Australia.

Background

Underemployment of disabled Australians

The unemployment rate of working-age Australians with disability is 10%, meaning those with a disability are twice as likely to be unemployed as those without. People with disabilities also experience longer periods of unemployment. (AIHW, 2020). The lack of financial independence that results for people with disability has been estimated to cost Australia \$54 billion in missed opportunities per annum (ACE National Network, 2008).

Research has shown that Vocational Education and Training (VET) increases the likelihood of youths with disabilities gaining employment, including those with intellectual disabilities, who are more likely to be disengaged than others (Nugraha & Mumpuniarti, 2018). Students with disabilities often experience difficulties with literacy and numeracy which leads many to leave standard education early, finding vocational training preferable (Winn & Hay, 2009).

When people with disabilities complete training and become employed, their financial position and ability to access services are improved, their purchasing power and capacity to contribute to society are increased, they will likely experience a better quality of life, and the social burden of welfare costs are reduced (Cocks et.al, 2015).

Opportunities of apprenticeships for people with disability

AAs appear to be a viable vocational pathway for all people, including people with disability (Cocks et.al, 2015). Whilst only 47.8% of people with disability of working age in Australia were employed in 2018, 71.6% of people with disability who successfully completed an apprenticeship that year were employed post apprenticeship, suggesting apprenticeship pathways may offer considerable advantages for this cohort. Despite this positive outcome, it is important to note that apprentices without disability were 16.4% more likely to be unemployed at the completion of their studies than their counterparts living with disability (NCVER, 2019).

Some of the advantages of AAs for people with disability include:

- Hands-on vocational experiences gained via the apprenticeship model are particularly important for people with disabilities who have difficulties learning in a classroom environment (Carter et al., 2012)
- Connection to non-disabled education and training improves feelings of inclusion and a deeper understanding of the work being done (Meacham et al., 2017)
- The structured progression through an apprenticeship program and the achievement of occupational competencies foster success, this structure and support is often unavailable in other jobs (Kuehn et al., 2021)

It is important to recognise the additional barriers that AAs with disability face. As well as aiming to increase the numbers of disabled AAs, focus must also be placed on providing additional support where necessary, to ensure that these apprentices have the best possible chance of successful completion. This will result in a greater return on investment for the eligible apprentice and trainee, the employer, the Government and ultimately the community (McDowell et al., 2011).

Disabled Australian Apprentice Wage Support (DAAWS)

DAAWS provides wage support to encourage employers to provide Australian Apprenticeships to people with disabilities. This program also provides off-the-job tutorial, mentor, and interpreter assistance. For those who are eligible, DAAWS pays \$104.30 per week (or on a pro-rata basis according to the hours worked part-time) in arrears to the employer for a period of 12 months. To receive this wage subsidy, employers must complete *Disabled Australian Apprentice Wage Support Claim Form (Form 1238)* and have their AA undertake a medical assessment by a medical practitioner or registered psychologist documented on *Occupational Assessment for an Australian Apprentice Form (Form 608)*. Where the AA has a current and valid Job Capacity Assessment or Employment Services Assessment, a new supplementary Form 608a may be completed in conjunction with Form 608, in place of a medical assessment by a medical practitioner or registered psychologist.

To support AAs who are experiencing difficulties with the off-the-job component of their apprenticeship, DAAWS provides up to a maximum of \$5,500 per year for tutorial services and a further maximum of \$5,500 per year for mentoring or interpreter services. If the Registered Training Organisation (RTO) makes a case proposing financial assistance of more than the stipulated hourly rate or yearly maximum, the proposal must be referred to the state or territory contract manager for determination. To claim these components, the RTO must submit the *Tutorial, Mentor, and Interpreter Assistance Form (Form 1288)* (Department of Education, Skills and Employment, 2022a).

NCVER found that DAAWS, as part of the Australian Apprenticeships Incentives Program has generally been a success in assisting people with disability into employment. The same NCVER research highlights that best practice and identified interventions have a positive impact on retention and completion rates and may include strategies such as smaller ratios between AA and mentors, and strongly recommends a focus on completions as opposed to commencement targets (McDowell et al., 2011).

However, apart from the NCVER report, little to no evidence of review of DAAWS is publicly available indicating a lack of evaluation of this Government intervention. Deloitte in their 2012 Econometric analysis of the Australian Apprenticeships Incentives Program reported that they “*Did not attempt to test any of these incentives because the disability criteria are not well defined and it was too difficult to determine the eligible population.*” Subsequent publicly available reviews and audits of the Australian Apprenticeships Incentives Program do not provide comment on the efficacy of DAAWS, including the recent Incentives System Reform (Department of Education, Skills and Employment, 2022b) which indicated the continuation

of the program with no other comment. Stakeholder feedback has identified serious issues with DAAWS indicating that the program would benefit from a more far-reaching and publicly accountable review.

Melbourne Apprenticeship Disability Network (MADN)

MADN is a collaborative network that works to identify, action, and respond to common issues and challenges faced by apprentices with disability, their employers and the organisations and institutions that support them. The network of over 45 member organisations meets quarterly to oversee a number of working parties. MADN aims to drive change and increase successful apprenticeship outcomes for people with disability living in Victoria.

Recommendations

This report's key finding is that the Australian Government must conduct a public facing review of the DAAWS program to validate and gain a deeper understanding of the concerns raised by the scheme's stakeholders. As part of this inquiry, MADN advocates for the investigation of the following recommendations.

1. Improve disability confidence of the sector

To ensure equitable access to AAs and to support the sustainability of future Australian workforces it is necessary to build the confidence of the apprenticeship sector to employ and appropriately support disabled apprentices. The Australian Government must develop and deliver an awareness campaign and capacity building activities to increase awareness and capability of the sector to recruit, employ and support disabled Australians into apprenticeships. Significant and targeted investment must be made to build awareness of all stakeholders of the successful employment pathway that AAs offer to disabled Australians, these activities must include increasing awareness of the supports available to AAs including the DAAWS program.

2. Improve information about DAAWS

Information about DAAWS supports, eligibility and application processes must be made readily available to all stakeholders. Recommendations include improving access to online information about eligibility, providing an instruction guide for applicants, providing information in Easy English format and ensuring all information provided meets the highest level of accessibility.

3. Simplify the DAAWS application process

Recommendations for simplifying the DAAWS application process include:

- Further research to identify and understand the barriers to successful completion of forms on first attempt
- Redesign of forms 1288 and 608 to ensure that those who are not familiar with the apprenticeship process, including medical practitioners and new AAs are able to complete them without coaching
- Increase DAAWS provision from 12 months to cover the life of an AA without the need for annual application
- Provide an application shortcut for disabled AAs who have already met proof of disability requirements for the National Disability Insurance Scheme, Disability Employment Services, Disability Support Pension, state and federal education departments or other government disability programs
- Consider the impact on disabled apprentices and their employers of upcoming changes that will see employer self-servicing of incentives

- Review eligibility criteria to include cognitive literacy and numeracy disabilities such as Aphasia, Dyslexia and Dyscalculia.

4. Uncouple employer incentive from tutorial and mentor supports

DAAWS is currently attempting to achieve too many objectives, leading to much of the complexity being experienced by the program's stakeholders. It is recommended that incentivising employers to apprentice people with disability should be managed separately from funding of an apprentice's off-the-job supports.

Reducing DAAWS to an incentive program and funding off-the-job supports separately will reduce the administrative burden faced by AAs, employers, GTOs and AASNs. TAFEs and RTOs should be provided with a streamlined process for funding off-the-job support that does not require managing external stakeholders. Employers and medical professionals should not be required to discern an AAs off-the-job support needs or face administratively heavy punishments for completing the application process incorrectly.

Funding off-the-job supports independently of the DAAWS incentive will increase disabled AA access to educational support delivered by TAFEs and RTOs. Under this model AAs who do not wish to share information about their disability with their employer, who only require support in education and not on the job, or who have been employed under other incentive programs will be able to access funded support to complete their apprenticeship education successfully.

TAFE and RTO providers call for reinstatement of measuring of Literacy and Numeracy aptitude for all AAs at the commencement of their training. This should not be intended to preclude any person from undertaking an AA, rather it would provide a tool to identify support requirements for all AAs.

5. Identify appropriate responsibilities and provide them disability awareness training

Administration of DAAWS and registration of all AAs need to be attended by a person who is equipped with awareness and understanding of disability, the needs of disabled apprentices and knowledge about the supports and resources that are available to them.

MADN stakeholders have identified several roles who could be funded and trained to provide this service, including:

- Disability Employment Services
- Apprenticeship Support Officers (this program would need to be extended beyond its current 12 month per AA lifespan)
- Apprenticeship Network Providers

Further investigation of the most appropriate role to take on this responsibility is recommended. Regardless of where the responsibility lands, it is imperative that this role not only be funded, facilitated by a person with appropriate disability training, but also be in a position that allows collaboration and information sharing with all of the stakeholders within an AA.

6. Improve collaboration for sharing of disability information in the sector

AA stakeholders are keen to further explore the capability of the sector to improve sharing of information about individual AA support needs (given an individual's consent to do so). Recommendations include:

- When disability is disclosed as part of a Training Contract, providing this information with the RTO in order for supports to be offered prior to the student's first day

- In the case of School Based Apprenticeships and Traineeships (SBATS) sharing of Individual Education Plans with AA stakeholders as these often list supports that have proven effective over a number of years
- Investigating how disclosure of disability on the Training Contract can trigger support for AAs and their employers and educators. Currently little is understood by stakeholders about what is triggered by this disclosure
- Exploration of how disclosure of disability can ensure follow up and support throughout the lifespan of the AA
- Allowing provision for “circles of support” that see the AA and relevant stakeholders (e.g. employers, educators, GTOs and parents/carers) to meet and discuss required supports and collaborative approaches to meeting each other’s needs

7. Increase transparency around usage of DAAWS

In order for the sector to measure the success of work towards improving access to and uptake of the DAAWS program, statistical data on the program’s use must be made publicly available.

Stakeholder feedback about DAAWS

The following provides discussion of concerns raised by each stakeholder group about the day-to-day impacts of working with the DAAWS program.

Apprentices

Disabled AAs fear sharing information about their disability with their employers due to concern that doing so may negatively impact on their employment status. Fears include loss of employment, loss of opportunity to experience training and practice in all areas of their chosen field, and fear of facing stigma, discrimination and bullying from employers and colleagues in the workplace.

The mechanism for encouraging disability disclosure as part of an AA is question 17 in the Training Contract which asks; “Do you consider yourself to have a disability, impairment or long-term condition?” Many disabled AAs do not share information about their disability because they do not see their disability as relevant to the Training Contract, fail to understand how their disability might impact on their work or training, are unaware that they qualify for disability support (particularly in the case of mental health conditions), or they feel anxiety and embarrassment to be disclosing details of their disability to a stranger.

AAs also avoid sharing information about disability with other organisations that they work with as part of their apprenticeship such as RTO’s, Group Training Organisations (GTOs) and Australian Apprenticeship Support Networks (AASNs) for fear that doing so may alert their employers to their disability. This issue prevents AAs who may only require support with their off-the-job components (with literacy and numeracy for example) from seeking support. Even when AAs disclose a disability as part of their Training Contract, AASN and GTO lack of awareness of available programs such as DAAWS and JobAccess creates further barriers to access.

Sharing information about a disability in an official capacity can be a taxing experience. Under the current siloed system, the AA is required to advocate repeatedly to seek support across various organisations. The weight of proving a disability is heavy; the requirement to provide recent medical evidence of disability (Form 608) is expensive and can involve lengthy wait times. Often forms are poorly completed by medical professionals and require re-submitting as doctors are unaware of the person’s employment support needs,

or do not understand the need to include the off-the-job components required to support the AA. There are instances where AA's have received support in school under "imputed disability" rules but have never received a formal diagnosis, preventing them from accessing DAAWS.

The heavy emphasis on administration to access DAAWS prevents many disabled AA's and their families from requesting and completing applications as they have difficulties understanding the process and language used in the paperwork. Lewis (2002) found that the waiting time for a DAAWS application to be processed averaged 12 weeks, a process that needed to be completed every 12 months. The extended application process leads to AA's often not receiving support for the vital first months of their apprenticeship at times leading to apprenticeships being retracted.

The administration burden on employers also has repercussions for AAs who often go without their off-the-job support when employers choose not to pursue a DAAWS application (often in favour of more rewarding incentive programs). Confusion surrounding eligibility to access these supports when an employer has not triggered a DAAWS application sees many AAs struggling unsupported with their coursework. Often AAs require only the off-the-job supports and do not receive them as they chose not to inform their employer about their disability, or the employer or medical professional indicate that these supports are not required due to lack of understanding of the AAs challenges.

Confusion around Existing Worker rules which prevent current employees being placed into an AA within the same company presents a further barrier for people with disability to undertake an apprenticeship. This rule particularly impacts people with disability whose pathway to employment requires a slower paced introduction to work life through part time or casual work. Access to these opportunities allow people with disabilities the time to build workplace skills and the confidence to undertake an apprenticeship.

AAs who live with cognitive language and numeracy disabilities such as Aphasia, Dyslexia and Dyscalculia which are recognised by the 2005 Disability Standards for Education (as part of the Disability Discrimination Act 1992), are precluded from receiving DAAWS support. The current Australian Apprenticeships Incentive System Program Guidelines (Department of Employment and Workplace Relations, 2022 states that employer eligibility can only be met when "the disability is not described as a lack of language, literacy, or numeracy skills". This denies many AAs the supports they require to access their education and employment on an equal basis with their peers as a direct impact of a disability that the program refuses to recognise.

Disappointingly, even after having successfully navigated the DAAWS application process, AAs have reported instances of education providers neglecting to deliver appropriate tutorial and interpreting support to students, examples include deaf and hard of hearing AAs expected to participate in classes without being able to communicate with their trainers. Issues reportedly include lack of available staffing and poor institutional communication processes regarding support needs post the development of Training Plans.

Apprentice Spotlight

Kaitlyn has just this year completed her Apprenticeship in Technical Engineering. Her host employer is a regional provider in Victoria's water industry, Kaitlyn and her host have been supported by a local Group Training Organisation (GTO).

Kaitlyn is a respected member of her work team who, together have found their own work arounds to manage her hearing impairment and difficulties processing information in written formats. Although, this hasn't been as easy a process as it could have been, Kaitlyn's workplace is fitted with an outdated hearing loop which hasn't yet been replaced:

"I think it comes down to not having enough information on the type of technology that can be used in replacement that suits all/most deaf and hard of hearing individuals and not just myself. So definitely a lack of information there, this goes for myself too."

Kaitlyn and her employer did not make an application for DAAWS, she had never heard of the program, it wasn't promoted to her or her employer. She was also not aware of the support that is available to her through Job Access or the Employment Assistance Fund. Kaitlyn did ask her GTO if there were any specific disability supports available to her, but was informed that there wasn't anything that she was eligible for.

Kaitlyn has a great attitude towards her disability, refusing to allow it to hold her back, or to work for a company that isn't willing to meet her halfway. She is concerned about her transition to employment post her apprenticeship, especially given many roles in her field involve communicating with customers which she is unsure how to work around at the moment.

Career Influencers

People who both formally and informally support people with disability to make career decisions also face barriers to successfully engaging with DAAWS. Lack of awareness of the value of AA pathways and supports such as DAAWS that are available prevent careers advisors, teachers and parents and carers from encouraging exploration of these opportunities by the disabled people that they support.

These influential people in a disabled person's life do not promote AAs due to concern that the person they support will not be able to successfully meet requirements both on and off the job, fear that the person they support will face stigma, bullying and discrimination, particularly in trade environments. Lack of community awareness of programs such as DAAWS and JobAccess serves to compound this issue as influencers believe that no support will be available to themselves or the disabled person that they support.

Parents and carers also face the weight of "proving" disability required to make a DAAWS application. Specialist medical appointments place financial strain on families who are also often required to support their prospective AA to attend them. The confusing administrative process further compounds the issue as further appointments are required when paperwork is not completed correctly by medical professionals.

Families have also reported frustration with the administrative weight of a DAAWS application. There is little available information about DAAWS generally, or to support them when making an application. Language

used in the application can be confusing, particularly for families who experience generational learning and reading disabilities.

Employers and Industry Groups

DAAWS is a program that aims to incentivise employers to provide AAs to people with disabilities, however it would appear that it is not well designed to enable employers to do so. Many of the barriers faced by apprentices themselves cause similar concerns for their employers and industry groups.

The complexity involved in making a DAAWS application along with the resulting administrative burden leads to many employers abandoning the process. Lewis (2002) found that on average the processes required approximately 25 hours of administrative work over a 12-week period. This is particularly weighty in small enterprises where employers face many competing priorities and have lower levels of digital inclusion.

Employers' poor awareness of and confusion regarding DAAWS is exacerbated by lack of access to clear information about eligibility, application processes, and relationship with other incentives such as Boosting Apprenticeships Commencements. Information provided online is rudimentary with little instruction or real support on offer, access to clear eligibility information is not easily available. Often awareness and advice from AASNs and GTOs is equally as poor, with instances of employers not being provided information about the scheme or being encouraged to pursue more lucrative incentives.

Those employers who do attempt accessing the DAAWS program are frustrated by applications being rejected. This is often due to poor understanding leading to incorrectly responding to questions in the application form by employers, and medical professionals. This increases the administrative burden as applications must then be resubmitted in full. Arbitrary rejection decisions such as medical professionals typing rather than handwriting their responses on Form 608 further compound frustration and lead to employers feeling that the effort required to get past the red tape for little financial reward is unsustainable, particularly as applications are required on an annual basis. Little publicly visible oversight of the administration of DAAWS is likely to be contributing to these issues.

Employers have also expressed exasperation at not learning about an apprentice's disability until later in the relationship, often only after issues have arisen. In most circumstances, employers have expressed that knowledge of the AA's situation would have helped them to understand and adjust workplace circumstances, avoiding future issues. This lack of disability confidence within the sector then creates a situation where employers, not being aware of their apprentice's disability apply for alternative incentives, excluding them for eligibility for DAAWS.

Confusion around the DAAWS existing worker rule further creates a barrier to creating opportunities for people with disability. Employers who provide casual or part time employment to a person with a disability to allow them to experience the workplace before committing to an AA are precluded from DAAWS applications. This limits the employer's opportunity to fill apprenticeship positions and to support apprentices with disability effectively.

Employer Spotlight

Valley Care is a not-for-profit company helping those living with a disability learn job skills in the landscaping and gardening sector. Based in Lilydale, Victoria, Valley Care provide training to young people so that they can learn skills to help them build confidence and be more independent.

In 2021 Valley Care employed six apprentices through the School Based Apprenticeship and Traineeship (SBAT) program, four of whom were eligible for DAAWS. The incentive program was an important financial consideration in taking on so many apprentices at once.

Valley Care are very thankful to atEast (SBAT Consortium) for their support in the DAAWS process:

“Judy has been a wonderful help this year. I would have been lost with out her! Because it has been a nightmare. It's been too confusing, you think you have filled it all out and nothing happens... still waiting for our funding!! Its been awful, and you (Australian Government) are sending our small business under.”

When asked what they would like the Australian Government to know about the DAAWS program, Valley Care responded:

“It's too confusing, too hard, too many forms, the people in charge don't know what they are doing and you can tell. We haven't seen a scrap of money all year... Do better, simplify, and get your act together because you are not helping at all.”

Valley Care have suggested that people with disability beginning an apprenticeship would benefit from being provided with:

“An outline of what to apply for and when. A clear timeline of what you expect from us”

Australian Apprenticeship Support Networks (AASNs) and Group Training Organisations (GTOs)

Being the gateway to AA support and information, AASNs and GTOs spend considerable effort in supporting employers and apprentices through the DAAWS process.

Lack of clear, publicly available information about eligibility is a common concern about DAAWS expressed by AASNs who are responsible for interpretation of the Incentive Guidelines for stakeholders. Lack of clarity even within the guidelines, particularly around disability sees AASNs experience difficulties in providing accurate information and advice to their clients. When seeking clarification from the Department of Education, Skills and Employment; AASNs have been redirected to the Incentive Guidelines without further assistance.

AASNs and GTOs are regularly required to support AAs and employers through the complexity of completing the DAAWS application process. Ensuring AAs receive necessary off-the-job supports involves coaching employers to identify the need for tutorial and mentor support in their application form. Employers are often unaware of the need for these supports, or of the implications of not requesting them in what they see as an employment form. Support is then required to ensure Form 608 is correctly completed by medical professionals to include off-the-job supports. AASNs and GTOs provide further coaching to AAs and their

parents and carers to ensure the right boxes in the application form are ticked and the correct responses are provided by their doctors, who are often also unaware of their patient's educational needs.

The current DAAWS application process requires the AASN and GTO to coordinate and manage several different stakeholders who have little understanding of:

- The scheme or its full intent
- The supports that are available both on and off the job
- The support needs of the disabled AA

This results in a merry go round of paperwork exchanges as AASNs and GTOs work towards ensuring the application is completed appropriately. If this is unsuccessful, the whole process must be completed again to rectify often arbitrary application errors. The process must then be repeated every 12 months to ensure ongoing support. This exhaustive task is not only time wasting for all involved but can also serve to sour the relationship between AASNs and GTOs and employers and AAs who see the overly bureaucratic nature of the process as the fault of these organisations. This can then have implications for further support seeking as employers and AAs would prefer to avoid similar processes to solve workplace and training issues.

TAFE and Registered Training Organisations (RTOs)

Despite DAAWS being an incentive-based program aimed towards employers, the scheme presents a number of concerns for TAFEs and RTOs. DAAWS funding provides for tutorial support for AAs in their off-the-job component of their training which is delivered by TAFEs and RTOs.

As many AAs are not comfortable sharing information about their disability with employers, TAFEs and RTOs must support disabled AAs without funding, or face the heavy administrative burden of assisting them through the DAAWS application process. Even when DAAWS applications are made by the employer the confusing process often leads to employers and medical professionals neglecting to include tutorial supports, forcing the education institution to complete a further application process. In some instances, TAFEs and RTOs have assigned full time positions to managing the DAAWS process, reducing their ability to deliver support programs effectively.

Confusion exists regarding eligibility for tutorial supports when an employer has not instigated a DAAWS application or has received a different incentive and can therefore rendering them ineligible for DAAWS. Many stakeholders across the sector believe that this excludes AAs from receiving DAAWS supports in TAFE or RTOs. This confusion also impacts AAs who do not require on-the-job support but do in their tertiary component (particularly prevalent for those requiring literacy and numeracy support due to disability). This leads to AAs not informing education providers about their support needs at all, or until they are experiencing substantial difficulties. This forces education providers into reactive problem solving to support their AAs rather than proactively supporting successful apprenticeships.

Disclosure of disability via the Training Contract or DAAWS application does not trigger notification of AA's disability to the TAFE or RTO. This leaves training providers unaware of the support needs of the AA or that support is required at all. Many supports, particularly those that require human resources take considerable time to organise, meaning AAs are left without the assistance that allows them to fairly access their education. Further compounding this issue, TAFEs are currently experiencing staff shortages as professionals are enticed by higher earnings in employment via the National Disability Insurance Scheme.

Many TAFEs and RTOs face significant difficulties providing appropriate supports to AAs who do not have a formal disability diagnosis. Given that DAAWS applications require Form 608 to be completed by a medical

professional, many students who were supported under imputed disability provisions during secondary school do not have an official diagnosis or the medical relationships that provide them (note that this postsecondary education disability policy is concerning across the entire student group and is not restricted to apprentices alone). Prohibitive costs and other factors prevent AAs from obtaining these resulting in TAFEs and RTOs being expected to provide unfunded supports across a broad range of disability needs; this is overwhelmingly true of literacy and numeracy support.

Next Steps

MADN members are committed to improving apprenticeship opportunities for people with disability and are keen to share their experiences of DAAWS with policy makers. The network invites all interested parties to begin discussions about the gaps and barriers being faced by the apprenticeship sector's stakeholders. MADN invites federal, state and local ministers and administrators to attend a forum to hear from stakeholders about their concerns and recommendations.

Following this discussion, MADN calls on the Australian Government's Department of Employment and Workplace Relations to proactively review the current state of the DAAWS program to identify, validate and understand the issues being faced by the program's stakeholders and to explore stakeholder driven solutions.

“Disability is not the problem of the individual; it is a result of the mismatch between the individual and their environment... A person with a disability can go through a whole day not really thinking about the disability, if their environment is structured in a way that responds to their needs.” Dr George Taleporos, JobAccess

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