



Submission

Inquiry by the ACT Legislative Assembly Standing Committee on Health, Ageing, Community and Social Services into the employment of people with disabilities in the Australian Capital Territory



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INTRODUCTION

NDS is Australia's peak body for disability service providers. We represent over 1100 organisations around Australia. This includes services supporting people with disability to seek and undertake employment in both supported employment and in the general employment market (open employment). We represent more than 50 disability service providers in the ACT.

Employment outcomes in Australia for people with disability are low in comparison with other OECD countries. There are some definitional issues in the comparisons but the Australian figures, even on their own, are compelling. In 2015, only 53.4 per cent of working age people with disability (1.1472 million) were in the labour force (i.e. in or actively seeking work), compared to 83.2 per cent of people with no disability. The 2015 employment rate of people with disability was 48.1 per cent of the working age population of people with disability (1.034 million).

The ACT's 2015 employment rate of 58.1 per cent of working age people with disability (20,100), compares favourably with the national average. However, it had declined from 2012 and, on the 2015 data, the employment rate for people with no disability in the ACT was 85.5 per cent - also higher than the national average (Source: SDAC 2015). Hence, while the ACT has somewhat better employment outcomes for people with disability than the national average, the levels are still low; and we also know from numerous surveys that of those people with disability in the workforce, many are not working as many hours as they want.

Given their size and contribution to the labour force in the ACT and the slightly better than average general employment levels here, the significantly poor work outcomes for people with disability in the APS (3.74 per cent) and in the ACT public service (2.2 per cent) in June 2016 are doubly concerning. The inquiry's focus on the ACT Public Service is thus timely.

Concerted attention to recruitment, support and retention of people with a disability can and does make a difference. For example, the NDIA's employment rate of 16 per cent shows what can, and should, be achieved by all government agencies seeking to increase their employment of people with disability. The NDIA is committed to supporting the employment and career development of people with disability through their current [Accessibility Action Plan](#).

In this submission we advance a number of key areas of action that the ACT Government can and should take to improve employment outcomes for people with disability generally and specifically in the ACT PS.

We have also had the opportunity of seeing the submission from the ACT Council of Social Service Inc. and we are in substantial agreement, especially with linkage of efforts across broader policy implementation measures and embedding disability accommodation as part of the work culture. We note specifically a good number of that submission's recommendations or refer to them. Where we note our support we do not repeat a separate recommendation of our own.

The wider ACT Environment

Work occurs in a social context as is noted in the ACTCOSS submission. At the broadest level this means continued attention and effort to effectively implement the National Disability Strategy to which all Australian governments, including the ACT, have committed. Social and workplace 'accommodation' are both factors in people being able to punctually and regularly attend work. It includes the physical accessibility of our public infrastructure. An on-going commitment to such accessibility is important. Alongside structural infrastructure, social infrastructure, such as accessible transport is part of this.

We believe the strengthening the ACT Taxi Subsidy Scheme should include extension of its reach to include accessible ride-share vehicles. The Commonwealth Government's Mobility Allowance changes can, and already have in some cases, adversely affected the ability of some people with disability to access transport options required to find and keep a job. This only serves to reinforce the importance of the ACT government's role in assisting people with disability to gain and retain employment through the public transport infrastructure it operates.

We support the ACTCOSS proposal for the use of appropriate levers by the ACT Government such as in tendering and incentives in the tax system, to prompt attitudinal change and grow disability awareness. And we agree in the broad that greater investment in what are actually very cost effective community-led work readiness, relationship building and capacity-building programs would grow the pool of people with disability more able to successfully apply for and undertake paid work.

As identified in priority area three of the National Disability Strategy, the ACT government's efforts to improve employer awareness and positive disposition in regard to the benefits of employing people with disability, such as the Inclusion Council's work, INVOLVE and the Inclusion Awards are also part of the broader social context. We have no specific recommendations in this regard but suggest review of their achievements and future work needs to be undertaken regularly.

The ACT Public Service Environment

In relation to specific positions being reserved for people with disability we observe that there is, of course, an existential dimension that is 'lived experience' which provides insight and knowledge, and motivation and passion that resides no-where else than under the skin of that person. The question is how to utilise and harness that knowledge and drive. There are a range of instances of specialist positions that do involve a more representative 'lived experience' dimension – such as appointments to senior positions in key policy departments of people from particular sectors - but these are exceptional rather than systemic responses.

The proposals by the University of Canberra, Institute of Governance and Policy Analysis in their APS perceptions paper for structured and built-in involvement of people with disability in their employment and management practices (ATP), has a more systemic character.

Nevertheless, even where this approach has some impact as a tool of consciousness-raising and attitudinal realignment (both extremely valuable), it is not clear that this necessarily inputs the appropriate information, guidance and expertise. This is the role and function of effective Disability Employment Services providers – where permitted to do so. Certainly this is true for those with a more significant impairment. A way needs to be found to replicate and ensure the appropriate focus of this function more generally. We note later in this submission that actually partnering with DES providers is one key way to generate improved outcomes not just in job numbers but also satisfaction and retention.

Proposals in the remainder of this submission are grouped under key areas for action that we consider would provide significantly improved outcomes:

- Linkage of disability employment with performance assessments
- Improved linkage with and to services and activities that have demonstrated positive impact, and
- Re-imagining of suitable skillsets and job-design.

LINKAGE WITH PERFORMANCE ASSESSMENTS

Australia has not adopted a quota system for disability employment and Australian governments have also tended not to have formal targets, preferring to rely on the welfare system and specific employment programs and supports designed to assist people with disability to gain and maintain employment, in both mainstream and supported settings. It is interesting, and perhaps instructive, that countries with the highest rates of disability employment do not use quota systems.

But, the use of targets (not quotas) in organisations can have a positive impact provided the point and application of targets is clear. This would mean that the target is linked to actual outcomes for agencies and individual managers potentially on both budget and performance assessment. A more comprehensive approach would thus link the collection of data with meaningful outcomes for work areas and drive a change agenda.

To increase disability employment organisations need to attract, recruit, retain and develop these staff.

This requires planning and attention to implementation steps not merely endorsement of desirable outcomes.

Implementation could include a wide variety of aspects. Part of this must be training and education about disability, while not necessarily driving change, is nevertheless a significant platform to address attitudes and practice.

For example, understanding the conceptualisation of disability is important. Mental models of disability contribute to the way in which individuals and organisations respond in the support and approach they take. There are a range of elements that contribute to disability. The Convention on the Rights of Persons with Disability (CRPD) locates disability in the interaction of impairments or personal characteristics with the environment and societal responses. In relation to the last, in particular, the human rights perspective of the Convention calls for accommodation of the disability in order to support inclusion and respect for the integrity of the person. This contrasts with, and supersedes, other approaches such as a medical model of disability which locates the disability in the person, thereby ignoring or downplaying the other factors. Similarly, the charity model of disability is the wrong model. The charity approach is one that seeks to respond positively and compassionately to persons with disability. But, like the medical model, it is limited and limiting. More often than not, the charity lens fails to recognise the full human dignity of the person in proposing or implementing personal or social responses designed to 'support' the person and address their so-called 'special' need.

The human rights lens is the correct lens. There are a range of resources on this from many different organisations. See, for example, the free courses run by the NSW Institute of Public Administration (<https://www.nsw.ipaa.org.au/courses/2016-2017/Upholding-the-Rights-of-People-with-Disability-A-Training-Package>) or contact the Canberra Institute of Technology which has a wealth of experience in training in this area.). NDS itself produces a number of resources on the human rights approach, most of them available on-line, using a variety of media. They are designed to educate workers and others about this perspective and to understand and apply that perspective in the workplace.

Of course, this concept-building work is not the only training and consciousness-raising needed, or that is available, but it is a fundamental building-block.

Equally, there can be any amount of training or resources available but if not used in an effective and systemic way, it serves no purpose. Whatever is the actual content of a learning program, without someone or something to take responsibility and leadership to formulate and lead a change management process – the directorates of the ACT PS included, - it will prove, and has been shown to be, essentially unproductive

The resources exist. What will drive the willingness to use them? In our view, the drivers need to be hard-wired into the fabric of normal practice in an organisation. This can only be done through using the usual management tools, namely, in performance criteria and assessment directed to accommodation and understanding of diversity - disability in particular. They go hand-in-hand. Such a requirement needs to be supported by access to resources and advice.

Recommendations: (i) That the performance criteria of all senior level staff of the APS include requirements to address diversity and disability in-particular and (ii) that the Government consider other specific measures such as the creation or contracting of a single source of advice to assist managers in addressing these responsibilities.

Other incentives could include recognition of employers with high rates of employment of people with disability (e.g. Awards) and communication strategies emphasising the positives of employment of people with disability.

In regard to specific attraction and recruitment actions, NDS notes the success of the recent [ACT Inclusion Traineeships](#) and we support the continuation these types of initiatives. The ACTCOSS proposal for extending this to traineeships with the Legislative Assembly is also supported. There is a significant [level of demand for the ACT PS traineeships](#) which strongly suggests the positive potential for this broadening. Any traineeship initiative in this respect should allow for the trainee to seek ongoing employment in the ACT PS as is currently the case for the existing scheme.

BETTER LINKAGE TO SERVICES THAT PRODUCE POSITIVE RESULTS

Formal partnerships with Disability Employment Services providers

Disability Employment Services (DES) providers are organisations that are focused on the provision of advice, support and connection between job seekers with disability and employers. They are part of the Commonwealth-funded employment support system.

Ongoing support for employees through the engagement of a DES provider would increase the likelihood of the placements of employees with disability providing long term employment outcomes, boosting the ACT PS's recruitment and retention of employees with disability.

The DES system is complex. It reflects many years of on-going policy development attempting to address a wide range of issues including ensuring value for money, driving and rewarding successful work outcomes and efforts to sustain a rational but competitive marketplace.

The end result, however, is a system that is highly prescriptive. This inflexibility sometimes results in perverse outcomes. Restrictions imposed to address value for money can sometimes result in a reduction of the capacity of the DES provider to be able to support a workplace to accommodate and respond to the specific needs of a particular employee: not through lack of capability of the DES provider but by virtue of the rules put in place with the intent to avoid and defeat 'gaming' of the payments criteria.

The answer to this however, is not to ignore the DES provider. On the contrary, there is much support and information that DES providers can and do undertake. Moreover, the ACT only has a small number of such providers. Hence, there is a relatively easy opportunity to form and foster relationships with them in both recruitment and support.

This would open the door to the reach and expertise of the DES not only in relation to specific issues of accommodation of particular individuals or recruitment of people with disability, but also advice and information with regard to job design and general management responses - alongside other guidance.

Recommendation: That ACT Public Service agencies partner with Disability Employment Services to increase the number of employees with disability in the ACT Public Service.

Social Procurement

Supported Employment Enterprises perform an indispensable role in employing 20,500 people with disability across Australia, most of whom would otherwise be excluded from the workforce.

NDS notes the ACT government's role in influencing employment rates for people with disability through its social procurement initiative, including a pre-qualified panel that includes local supported employment enterprises.

We also are aware that some agencies are already actively seeking out such procurements, particularly where these involve the provision of services such as cleaning, gardening, landscaping, packaging and the like. This is a positive feature of practice in some areas of the ACT PS that could, however, be extended and broadened.

There are two ways that we suggest this could be done.

The first way is through improved implementation of the NDIS. With the roll-out of the NDIS having taken place in the ACT, the previous cap on funded places for supported employees has been lifted. Consequently, local supported employment enterprises have increased workforce capacity to meet an increase in demand for goods and services they produce. However, as changes are being made to transition support for people with disability in supported employment to the NDIS; the funding under existing programs is being removed. Corresponding uptake within the individual plans and through the NDIS planning process is highly limited.

The capacity of supported employment organisations to take up opportunities and provide the intended work for people with disability is thus being restricted. This restriction needs to be removed by a resolution of the barriers arising from the NDIS planning process. We are advised by one such service that with proposed procurement from ACT government bodies it could employ between an extra 10 – 25 people with disability (which it has the capacity to support) in the next two months, if there were money in plans for it to provide the necessary support.

Recommendation: That the resolution of barriers in NDIS planning processes to support people with disability into employment be taken up by the National Disability Insurance Agency as a priority.

The second way for extension and improvement would be for the ACT to take a stronger whole of government approach to its procurement from supported employment enterprises.

These types of policies have been introduced in other Australian States and emphasise partnering with existing employment service providers, as well as the introduction of specific disability procurement policies.

The potential of wider employment for people in supported employment could be further extended with support by the ACT Government. The government is already committed to the INVOLVE initiative to promote and facilitate policies, approaches and initiatives consistent with the National Disability Strategy, one of which is to improve employment.

As an extension of such a commitment, we suggest that the ACT government should seek to formally partner with NDS's BuyAbility campaign. NDS has initiated the BuyAbility campaign to help promote supported employment as a valuable option for people with disability. BuyAbility will promote supported employment enterprises, increase the number of people in supported employment, attract more buyers and make supported employment more visible.

BuyAbility aims to actively promote the breadth and capacity of supported employment enterprises to the public and private sectors in order to secure more contracts that enable people with disability to engage in quality employment options.

Current BuyAbility activities include:

- Ongoing business development activity through building relationships in the public and private sectors
- Enhancing brokerage solutions for simpler and more efficient access to supported employment enterprises
- Direct marketing strategy focused on all levels of government and the private sector
- Customer portal to a 'Request for Quotation' platform allowing clients and supported employment enterprises to directly interact to achieve procurement outcomes
- Business advisory and education solutions focused on supported employment enterprises

NDS will shortly be launching the BuyAbility website (www.buyability.org.au) including a database and interactive map to search for supported employment enterprises. BuyAbility will incorporate several existing state government procurement programs and will shortly be operating more actively on a national level, working in partnership with Commonwealth departments and agencies. In NSW for example, since 2011, the Disability Enterprise Procurement program, which NDS administers, has generated over \$16.1 million in contracts of work for 49 supported employment enterprises. More than 600 people with disability have work as a result.

Recommendation: That the ACT government formally partner with the BuyAbility campaign.

Implement policies that assist students with disability to successfully transition into the workforce

The National Disability Strategy identifies the need for high quality programs designed to create a smooth transition from education to employment. Sound school to work supports will have a positive effect on the overall employment participation rate of people with disability and the ongoing viability of the NDIS.

Well-designed school to work transition supports are an important way to improve the employment participation of people with disability and connecting a young person with the world of work before they leave school greatly improves their chances of securing ongoing employment.

Transition policies should include specialist supports that allow students with disability to participate in work experience, school based traineeships and after-school work. These help to build employment pathways and support school to work transition, including after-school work and work experience. These policies can operate at all levels of education.

Ticket to Work is an initiative of NDS that supports young people with disability to transition from school to employment in the same manner as their peers without disability.

Ticket to Work is an evidence-based initiative that leverages the power of cross-sectoral collaborative partnerships to improve employment outcomes for young people with disability. It builds the capacity of mainstream services and systems to address the needs of young people with disability through a collective impact framework.

The Ticket to Work model is based on extensive research into what works, including:

- Bringing together disability-specific and mainstream representatives from a variety of sectors to work strategically and collaboratively
- Supporting young people to gain access to early experiences that positively influence their views of themselves as workers
- Preparing young people with disability for the workplace and gives them an employment pathway that is typical of other young adults
- Increasing opportunities for meaningful work experience and learning prior to exiting school.

Ticket to Work has been operating in the ACT for the past two years as a pilot program. It relies heavily on a team of people that activate around the person in their last year of school, all of whom operate without payment for their engagement. At the same time, they are assisted in what they do by the maintenance of a ticket-to-work network and advice service which is maintained by NDS through the employment of a ticket-to-work specialist and with general administrative support. Ticket-to-Work was established with pilot funding that has now ceased. While the individual teams operate autonomously their sustainability over the longer term is dependent on the backbone work.

An evaluation of Ticket to Work has demonstrated that participants have superior education and employment outcomes to their peers with disability not in the program. It also positively engages with employers, including 600 nationally across a range of industries and business sizes.

Ticket to Work has shown that an early intervention collaborative approach can create sustainable employment opportunities for young people with significant disability.

Recommendation: (i) Continue to implement policies that ensure a smooth and sustained transition from education to employment for young people with disability and (ii) provide funding for the Ticket to Work Program to continue to operate in the ACT.

Vocational Education and Training for people with disability

Completing a Vocational Education and Training (VET) qualification strongly improves the chances of people with disability gaining and keeping a job.

People with disability are generally under-represented in the VET sector (6.8 per cent in 2013) and they generally have lower levels of education. This has been identified as one of the factors contributing to their lower rate of employment.

Unemployed people with disability that complete a training course at Cert III level and above are 20 per cent more likely to be employed after the training. For unemployed people without disability, the figure is 10 per cent. This means that VET training provides twice the impact for people with disability looking for employment.

Completion of a VET qualification generally provides assurance to employers that a job candidate's disability would not prevent them performing tasks that are relevant to their prospective job.

Recommendation: Implement policies that enhance participation in and outcomes from vocational education and training (VET) for people with disability in the ACT.

RE-IMAGINATION OF SUITABLE SKILLSETS AND JOB DESIGN

Enhance disability employment through strategies to address workplace barriers

The most recent ACT Public Service Disability Employment Strategy expired in 2015. There were 437 employees (2.1%) with disability in the ACT PS in the strategy's final year, less than the strategy's goal of 655 staff. (Source: ACT State of the Service Report 2014-15). Moving beyond targets, the ACT public service should seek to become a model employer for people with disability. A holistic approach to the recruitment and retention of people with disability should be adopted, that addresses and removes barriers to employment.

The terms of reference specifically refers to recent work conducted on disability employment, namely, *Doing it differently – Staff perceptions of the barriers to workplace participation experienced by public servants with disability in the Australian Public Service* (Nov 2016, University of Canberra and the Institute for Governance and Policy Analysis). The paper examines attitudes to employees with disability in the APS, including input from employees with disability on their experiences. Other research in this area that examines employment barriers includes *Disability Employment: A Review of Current Management Research Developed by the Melbourne Business School Asia Pacific Social Impact Leadership Centre* (Aug 2014).

Barriers to employment most often include an inflexible organisational culture, negative attitudes (including those of both employees with disability and employers) and unsuitable job design.

People with disability may present for work with a range of barriers. These can include one or more of personally-located factors such as level of education or educational attainment, impaired or different communication and/or analytical capability, mobility or other physical impairments, such as low vision or hearing, stamina and general health, and mental health issues. Discrimination and attitudinal barriers can and often do arise from these aspects. The reluctance of many people to disclose or identify as someone with some such significant personal characteristics often arises from the adverse social response. The negative social connotation of disability remains significant - with derogatory stereotypes still not uncommon.

Since the barriers are multifaceted; so must be the responses. Without losing the importance of the generic term disability, there is a need to recognise that the accommodation and support needs of different individuals vary. For example, policy or support responses to address work-readiness responds to the needs of some people with disability but not to others, who may, by contrast, have significant work skills and high educational attainment. Attitude and lack of knowledge is often seen as a more significant barrier where the disability is not visually apparent and so forth. Work type also impacts differently on the capacity of people with certain types of impairments.

Addressing these barriers should start with development of policies that enhance the attraction and retention of employees with disability. An example of this would be the introduction of accessible interview processes for people with disability that negate automatic disadvantage due to communication impediments.

We also believe it unarguable that inflexibility of workplaces is a major barrier in just about all cases. And this applies generally to the accommodation of all types of diversity. Whether the drivers for inflexibility is seen as a focus on 'performance' or ensuring accountability or any other factor, an inflexible workplace caters only to a narrow band of effective workers and is one that excludes and tends to remove people with disability. As such, job design and management practices must be included in any useful response to the low employment levels in the ACT PS.

Reasonable adjustment is also essential as are workplace modifications and services that allow an employee with disability to operate in a position without unnecessary hindrance and which also maximise their capabilities. In Australia, such workplace

modifications and services can be accessed through the [Employment Assistance Fund \(EAF\)](#). In addition, the Commonwealth has recently overhauled the [Job Access](#) website, ensuring it is a more comprehensive resource hub that will facilitate the employment of people with disability and better assist employers and service providers.

Employers need to enhance their focus on people, not policy and increase the awareness of all employees and management of disability. The emphasis should be on what employees with disability can achieve and the investment required to best support these employees to perform in their jobs.

A positive workplace culture should be cognisant of the unique needs of individuals as opposed to insisting on the overarching application of working practices that may be inflexible and which result in unconscious bias. A positive workplace culture also allows employees to seek assistance for matters affecting their employment, as required.

As we have noted, the disclosure of an individual's disability remains a difficult matter for both employees and employers. Employers should ensure that in addition to flexible working practices, employees are aware that they will not be penalised or disadvantaged if they do disclose.

This can be demonstrated through employer commitments to diversity that include formal policies, disability aware HR staff, equitable complaints resolution and evidence of people with disability in the workplace. In addition the employer should be committed to ensuring that disability is not an impediment to career advancement and endeavour to increase the participation of employees with disability in more senior roles within the organisation.

Job Design

In addition to addressing organisational culture issues, NDS has previously emphasised that public sector employers need to carefully consider how they can better design jobs that are suitable for people with disability, in particular people with an intellectual disability. Lower level public sector jobs have been phased out over the past two decades, which may to some extent explain the decrease in employment rates for public sector employees with disability over that time.

We again agree with ACTCOSS that the ACT PS and the directorates and agencies within it should review of the capacity of their workplaces for lower entry-level tasks.

We would add that this should review should extend to address whether such tasks could be outsourced to people with disability or organisations employing them for such tasks. We are aware of instances where ACT PS organisations already undertake such approaches, which appear to be positive and on-going. However, it is unclear to what extent these represent a broader practice and approach across the entire service.

This factor is specifically identified as one of the four key elements in the [As One: Making it Happen, APS Disability Employment Strategy 2016–19](#) and should be adopted by the ACT PS as well. DES providers would be able to assist ACT government agencies with the design of these types of positions.

In looking to existing precedents and approaches the ACT Public Service could also consider the Australian Defence Department's Building Accessibility in Defence Program, specifically designed to employ people with an intellectual disability. The sustainability of the program is maintained by three main pillars

- employment Structure (workplace analysis & matching, training and development, career pathways, adjustment and recruitment)
- accessibility Hub (a one-stop-shop for internal Departmental queries/issues regarding accessibility at all levels – e.g. furniture, office environmental features, attitudes)
- high ranking Departmental Champions, that help to increase awareness and uptake

The Department of Defence's Diversity and Inclusion Strategy identifies people with disability as an immediate diversity priority for Defence, and outlines the organisation's intended actions under the themes of Attract, Recruit, Develop, Retain, and Transition.

In the strategy a key employment structure action is the Defence Administrative Assistance Program (DAAP). This is a partnership with local Australian Disability Enterprises to provide people with disability to engage in meaningful work. DAAP teams assist work units with low complexity tasks such as photocopying, large and small mail outs, packaging and collating conference papers, folders and information kits. By providing these services, DAAP teams enhance Defence capability and free up work units to focus on priority tasks.

Another current Commonwealth disability employment initiative includes the RecruitAbility scheme. RecruitAbility aims to improve the disability awareness of APS hiring managers as well as the confidence and capability of applicants with disability. Job applicants are able to gain enhanced progression through the recruitment process if they "opt-in" to RecruitAbility, allowing early disclosure and ensuring they not disadvantaged by doing this.

Recommendations: Adopt or implement policies focused on facilitation of flexible work practices and clearer identification of higher and lower level work with an emphasis on the provision of supports focused on the individuals involved;

The ACT government should also examine strategies that have been implemented in other Australian jurisdictions that aim to increase the employment rates of people with disability. An example is the NSW Government's Employment Enablement Strategy. The Strategy has two main components; (i) providing employment preparedness through Employment Enablement Packages and (ii) building the capacity of businesses to employ people with disability.

The strategy includes the [High Growth Jobs, Talented Candidates](#) (HGJTC) project, which aims to meet the needs of employers by building their disability confidence through expert training and helping to better prepare candidates with disability for the jobs of the

future. The project focuses on the needs of employers and candidates, ensuring effective job matches.

There is now a role for disability service providers under the NDIS in undertaking work preparedness support but such work is all the more fruitful if done in partnership and with specific work opportunities in mind or in-place.

Recommendation: That the ACT government create a mechanism that is able to foster and direct closer links and alignment with those services providing work readiness support for people with disability.

NATIONAL DISABILITY SERVICES

May 2017

- 1 ADVOCATING FOR A WELL-DESIGNED AND PROPERLY FUNDED NDIS
- 2 INFLUENCING POLICIES TO BENEFIT PEOPLE WITH DISABILITY
- 3 GIVING MEMBERS THE CAPACITY TO MEET FUTURE CHALLENGES
- 4 INFORMING BETTER QUALITY SERVICE DELIVERY
- 5 ASSISTING THE SECTOR TO OVERCOME WORKFORCE CHALLENGES
- 6 STRENGTHENING NDS TO BETTER SUPPORT OUR MEMBERS