

Joint Submission

Employment White Paper

Submission to the Australian Treasury's Employment White Paper



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Acknowledgment of Country

The Disability Representative Organisations would like to acknowledge the traditional custodians of the lands on which this report has been written, reviewed and produced, whose cultures and customs have nurtured and continue to nurture this land since the Dreamtime. We pay our respects to their Elders past, present and future. This is, was and always will be Aboriginal land

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About the Disability Representative Organisations

The following Disability Representative Organisations have worked together to produce this joint submission.

We are funded by the Australian Government to represent the 4.4 million Australians with disability.

First Peoples Disability Network (FPDN) is a national human rights organisation of, and for, Australia's First Peoples with disability, their families, and communities, governed by First peoples with lived experience of disability.

People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability. We have a vision of a socially just, accessible and inclusive community in which the contribution, potential and diversity of people with disability are not only recognised and respected but also celebrated.

Children and Young People with Disability Australia (CYDA) is a national peak body that represents children and young people (aged 0-25) with disability.

National Disability Ethnic Alliance (NEDA) is a cross-national peak organisation that supports and advocates for the interests and rights of people with a disability from non-English speaking backgrounds (NESB), their families, and carers throughout Australia.

Inclusion Australia (IA) is the national representative body for people with an intellectual disability and their families.

Disability Advocacy Network Australia (DANA) is the national representative body for a network of advocacy organisations throughout Australia.

Women with Disabilities Australia (WWDA) is the national Disabled People's Organisation for women, girls, feminine identifying and non-binary people with disabilities in Australia.

Introduction

Disability Representative Organisations (DROs), Children and Young People with Disability (CYDA), Disability Advocacy Network Australia (DANA), First Peoples Disability Network (FPDN), Inclusion Australia (IA), National Ethnic Disability Alliance (NEDA), People with Disability Australia (PWDA), and Women with Disability Australia (WWDA) thank you for the opportunity to comment on the Employment White Paper Terms of Reference, following the Prime Minister's Jobs and Skills Summit held in September 2022.

This submission will address the following Terms of Reference (ToR):

- **Item 2** – The future of work and labour market implications of structural change, with a focus on:
 - 2.1 Building a sustainable care economy in the context of an ageing population and other drivers of demand for care services
 - 2.2 The energy transition and tackling climate change to achieve net zero
 - 2.5 The adaptability of our workforce to meet the needs of emerging industries and areas of traditional economic strength
- **Item 3** – Job security, fair pay and conditions, including the role of workplace relations
- **Item 4** – Pay equity, including the gender pay gap, equal opportunities for women and the benefits of a more inclusive workforce
- **Item 5** – Labour force participation, labour supply and improving employment opportunities
 - 5.1 Reducing barriers and disincentives to work, including the role of childcare, social security settings and employment services
 - 5.2 Improving labour market outcomes for those who face challenges in employment, including First Nations people, those who live in rural and remote areas, younger and older Australians, people with disability, and those who may experience discrimination
 - 5.3 Skills, education and training, upskilling and reskilling, including in transitioning sectors and regions

The submission context is based on the UN Convention on the Rights of Persons with Disability (CRPD), which Australia is a signatory to, alongside legislation overarching disability employment, enshrined in the Disability Discrimination Act 1992 (DDA).

Article 27 of the CRPD stipulates that ‘States Parties recognize the right of persons with disabilities to work, on an equal basis with others; this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities. States Parties shall safeguard and promote the realization of the right to work, including for those who acquire a disability during the course of employment, by taking appropriate steps, including through legislation.’¹ Despite this decree, people with disability are being shut out of the labour market in Australia, experiencing issues in both gaining, and maintaining employment.

People with disability are more likely to be underemployed, or unemployed in Australia. Figures from the Australian Bureau of Statistics (ABS) Survey of Disability, Ageing and Carers (SDAC) 2018 reveal that working aged people with disability (15 to 64) are more likely to be unemployed than people without disability. The unemployment rate of working-age people with disability (10% or 113,000) is twice that of those without disability (4.6% or 544,000).² The unemployment rate has remained unchanged for years; the 2015 and 2012 SDAC indicated that rates had remained stable (Similar to 2012, Australians with disability were more likely to be unemployed compared to those without disability - 10.0% compared with 5.3%.³

For people with disability belonging to multiple marginalised communities, inequality within Australia’s labour market is further compounded. For example, the 2014-15 National Aboriginal and Torres Strait Islander Social Survey (NATSISS) found that First Nations people with severe and profound disability are almost twice as likely as First Nations people without disability to be unemployed⁴; while the 2016 Australian Human Rights Commission *Willing to Work Inquiry* found that LGBTIQ+ people with disability can face particular issues in the context of employment discrimination, such as the limitations placed on people with HIV in certain workplaces, such as bans on performing certain medical procedures and on serving in the Australia Defence Force.⁵

It is imperative that disability discrimination (particularly intersectional disability discrimination) in relation to gaining and maintaining employment for people with disability ends. People with disability need access to mainstream employment, in the open labour market. Diversity and inclusion in workplaces will assist in driving

¹ United Nations Convention on the Rights of Persons with Disabilities (30 March 2007, New York) [2008], [Article 27 – Work and employment](#)

² Australian Bureau of Statistics (2018) [People with disability in Australia](#), Australian Institute of Health and Welfare, accessed 22 November 2022.

³ Australian Bureau of Statistics (2015). [Disability, Ageing and Carers, Australia: First Results](#). Accessed 8 December 2022

⁴ Avery, S., (2018). *Culture is inclusion: A narrative of Aboriginal and Torres Strait Islander people with disability*, First Peoples Disability Network (Australia), Sydney, p. 132.

⁵ Australian Human Rights Commission (2016) [Willing to Work: National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability](#), p. 186, accessed December 2022.

towards the goals determined by the Jobs and Skills Summit such as a better skilled, better trained workforce and addressing skills shortages. Similarly, diversity and inclusion initiatives will support boosting job security and wages, and creating safe, fair, accessible and productive workplaces. The employment of people with disability across sectors will provide valuable insight into:

- workplace systems and processes that enhance inclusion and remove barriers
- the facilitation of a more diverse workforce through recruitment, and retention of more people with disability
- how processes can be implemented for a sustainable care economy, including care for people with disability and people with intersectional needs
- meeting the intersectional needs of a diverse population in response to emerging industries, as well as areas of traditional economic strength

Furthermore, there are opportunities to harness the knowledge and experience of people with disability through co-design to make services and products more accessible and inclusive and increase the market for these services and products.

The DROs who have contributed to this joint submission have been advocating for increased levels of employment for people with disability for decades. The Employment White Paper and subsequent actions present an opportunity for substantive changes in employment outcomes for people with disability. This will be achieved through addressing workplace barriers including employer attitudes about employment of people with disability. Further, increased employment of people with disability will boost the diversity of the workforce by including First Peoples with disability, people from culturally and linguistically diverse backgrounds (CALD), young people, and all people with disability with intersectional needs.

In addition to this joint submission, Appendix A includes a list of submissions that we would like considered in building a roadmap for Australia to achieve a bigger, more diverse, highly trained, more accessible, and more productive workforce.

Future of work and labour market

This section responds to ToR items 2.1, 2.2, and 2.5, to address the future of work and labour market in the context of supporting people with disability into employment.

2.1 Building a sustainable care economy

It is imperative that in considering the future of work, and the labour market implications of structural change, that there is a focus on building a sustainable care economy in the context of an ageing population.

The National Ethnic Disability Alliance (NEDA) has observed that there currently exists a demand for carers of diverse backgrounds, and this will grow as the current cohorts of migrants as long-term citizens and permanent residents aged between 45 to 67 enter retirement.

While the pre-pandemic skilled migrant workforce provided a much-needed carer workforce, today we need a carer workforce that is better paid, has better supports, and offers flexible conditions to attract a skilled permanent carer workforce in aged care, early childhood education, and disability support.

Recommendations

There are not enough carer visas available due to the cap. The waiting time for visa applications is long and can be up to six years. Meanwhile many Australians who need ongoing substantial care today go without help as the NDIS does not cover all care that is required.

Recommendation 1 – Remove the cap on the number of Carer visas that can be granted each year

The waiting time for visa applications is long. For carers who are currently onshore and providing care for their family members on temporary visas, they are left with no means of work and financial support to sustain themselves while waiting for the visa application outcome. As per the Global Processing Unit, the department is still reviewing applications submitted in 2008.

Recommendation 2 – Reduce the processing times for Carer visas by simplifying the application process and assessing applications within 90 days of application.

The visa application and appeals process is complex and expensive. People with disability have to go above and beyond to prove that they are out of options to be cared for at home by their family members.

People with disability in need of care should have access to sufficient support regardless of financial status or cultural background. Lack of help and complexity denies people with a disability the opportunity of being cared for at home.

Recommendation 3 – Fund immigration assistance for Carer visa applicants and sponsors (people with disability) according to need.

Recommendation 4 – Scrap the increase to application fees in the AAT Migration and Refugee division.

Recommendation 5 – Remove the two-year waiting period for newly arrived migrants to access Carer payments and the one-year waiting period to access Carer allowance.

The extended waiting periods have the effect of withholding basic income support for someone who becomes the carer of someone with a disability.

2.2 The energy transition

NEDA has also observed the impact of the energy transition and the focus towards net zero emissions to combat climate change, and effects on employment for people with diverse backgrounds.

Employment policy today must be ready to respond to the impacts of climate change, by adequately ensuring the settlement of migrants and refugees displaced by climate change is considered and addressed through appropriate local government-level responses that can be adapted as needed.

However, this requires a policy framework and investment that all levels of government adhere to. This work must be well resourced to maintain and improve infrastructure and keep and attract diverse people in the regions to ensure there is an appropriate care workforce to support culturally and linguistically diverse people with disability across Australia.

Recommendations

Recommendation 6 – Develop a national policy framework on environmental migration that adequately supports people with a disability to resettle in Australia, including support in origin and transit countries

Recommendation 7 – Conduct research to identify the experiences, expectations and recommendations of environmental migrants to better understand the drivers of environmental migration, as well as the experience of relocation processes in Australia.

Recommendation 8 – Remove the migration health requirement for environmental migrants that discriminates against people with a disability, or those with ongoing health conditions.

Recommendation 9 – Identify the unmet conditions and resources environmental migrants with disability need to participate in the co-production of planned relocation.

Recommendation 10 – Develop principles that can be used by different levels of government, community organisations, professionals, and environmental migrants with a disability to better understand and improve planned relocation.

2.5 Adaptability of our workforce

In the early stages of the COVID-19 pandemic, measures were swiftly implemented in workplaces across the country to accommodate physical distancing mandates, travel restrictions, and stay-at-home directives. One major accommodation was a rapid transition to enabling technology systems to enable remote working, however, this reliance has been reduced since the beginning of the pandemic to encourage people to return to work in the office.

People with disability have benefited enormously from being able to work remotely and this is a workplace adjustment that people with disability have been advocating for years. The benefits of remote work for many people with disability are increased productivity, resulting from the removal of fatigue as well as removal of accessibility complications of commuting to and from the workplace.

Recommendations

Recommendation 11 – Ensure Australia’s employment sector offers better income protection for all people with disability and multicultural workers by removing or reducing the long waiting periods to access existing income support, and by removing the ‘no-more-than 28 days abroad’ criteria to access the Disability Support Pension and other income support payments.

Recommendation 12 – Broaden the definition of ‘immediate family’ or ‘family unit’ when considering carers leave, to better reflect the lived experience of CALD communities who often live in joint family households and/or who think of carer

responsibility as beyond the immediate family including those who aren't biologically related.

Recommendation 13 – Ensure all workplaces provide adequate reasonable adjustments that are organised and resourced for by the employer. This should include the provision of flexible work hours and hybrid working options, investing in tools and technology that supports different working models.

Future of Job security, fair pay, and fair conditions

This section responds to TOR item 3, outlining some of the inequity that people with disability currently face in the labour market, including segregated employment.

All people need job security, fair pay, and fair work conditions, although in Australia, not all people have these conditions. People with disability struggle in both gaining and maintaining employment, and the barriers to work are particularly pronounced for some groups of people with disability.

- Working-aged people with severe or profound disability (13% or 17,000) have a higher unemployment rate than those with other disability (9.9% or 95,000).
- Youth (aged 15 to 24) with disability (25% or 38,000) are more likely than those aged 25 to 64 (7.9% or 75,000) to be unemployed
- Working-age males with disability (11% or 63,000) are slightly more likely than their female counterparts (9.4% or 50,000) to be unemployed
- Of working-aged people with disability, those with sensory and speech disability (8.2% or 18,000) are less likely to be unemployed than those with psychosocial disability⁶

People with disability have the right to participate in mainstream employment, with a move to end segregation created through Australian Disability Enterprises (ADEs). People with disability need economic security, meaningful social engagement, and the ability for community participation through work. Despite being an economic safety net, access to the Disability Support Pension (DSP) or Job Seeker payments (which are even lower than the DSP) does not provide economic security.

There are still an alarming number of households living in poverty that include a person with disability accessing the DSP. According to the Australian Council of Social Services (ACOSS) and the University of New South Wales, 41% of people in households with a person with disability accessing the DSP are in poverty. This figure increases to 55% if the 60% median income poverty line is used.⁷

Inclusion Australia (IA) has increasingly observed the detrimental impacts of not having access to paid work in open and/or self-employment, and the ongoing negative impact of segregated employment on their membership.

⁶ Australian Institute of Health and Welfare (2022). [People with disability in Australia](#), accessed 6 December 2022.

⁷ ACOSS (ND). [Data and figures: Rates of income by support payment](#), accessed 23 November 2022.

Brief overview of segregated employment and pay inequity

Most people with an intellectual disability do not have access to paid work in open and/or self-employment. This means that most people with an intellectual disability live in poverty, with no opportunity to participate in mainstream community life as non-disabled people, and other people with disability.

There is a clear economic case for investing in a better system for people with an intellectual disability. In its current form, our employment system isn't delivering for the people that need support the most and face the biggest barriers to work. We need a smarter, better, evidence-based system that will support people with an intellectual disability to be fully included in the community.

Deloitte modelling found that 'closing the gap between labour market participation rates and unemployment rates for people with and without disabilities by one-third would result in a cumulative \$43 billion increase in Australia's GDP over the next decade in real dollar terms. The modelling also suggests that GDP will be around 0.85% higher over the longer term, which was equivalent to an increase in GDP of \$12 billion in 2011.'⁸

Barriers to work

The evidence is very clear that people with an intellectual disability can work in open and self-employment, with the right support. The barriers they face are in the systems that are meant to support them.

People with an intellectual disability often encounter low expectations about their capacity throughout their lives, and do not have access to the same kinds of options and choices as their non-disabled peers. Changing these expectations starts for people with an intellectual disability from when they are school, through entry into open and self-employment and reducing the barriers that get in their way.

Currently, the policy settings have not supported people with an intellectual disability to have many choices, including the choice of open and self-employment. In fact, the current policy settings push people with an intellectual disability towards segregated settings, such as ADEs and day programs. If people with an intellectual disability start down this path towards segregation, it is very unlikely they will ever get into open or self-employment and will remain living in poverty, and segregated from the rest of Australia, for the rest of their lives.

⁸ Deloitte (2011) [Increasing employment for people with disability](#), accessed 23 November 2022

Segregated employment

Employment in ADEs is a common experience for Australians with intellectual disability. People with an intellectual disability who use NDIS supports are more likely to be employed in ADEs than other people with disability who use the NDIS. More people with an intellectual disability who use NDIS supports, who are aged 25 years and over and are employed, have employment in ADEs (70%), with 15% having a job in open employment on a full wage, and a further 13% having a job in open employment on a part wage.⁹ Younger people with an intellectual disability who use the NDIS (aged 15-24) are far more likely to be in open employment (on part or full wages) than employed by an ADE.¹⁰

There is evidence that early placement of young people with an intellectual disability into segregated day programs and sheltered employment options reduces their later economic participation.¹¹ There is strong evidence that once in segregated employment settings, such as ADEs, few transition out into open employment. In 2014, less than 1% of those employed in an ADE transitioned to employment in the mainstream labour market.^{12, 13} Similarly, National Disability Services suggests that less than 5% of people with disability transition to open employment from day services or supported employment settings in Australia.¹⁴

In order to improve labour market outcomes for people with disability, it will be essential to invest in a structural industry transition away from segregated employment in ADEs to supported and inclusive open employment. An important part of this will be moving away from the Supported Wage System and paying people with an intellectual disability properly, to ensure everyone in Australia receives fair pay for a fair day's work.

I used to work at [name of ADE] and people look down at you. It's terrible. I left there and now I work at [local op shop] and the people are happy... I get better pay than before and they treat you like an adult, not a little kid... People don't yell there... I love my job. We laugh and giggle and tell jokes but when it's time to work we have to be professional and serious.

⁹ National Disability Insurance Agency (NDIA) (2019). [People with an intellectual disability in the NDIS](#).

¹⁰ As above

¹¹ Cocks, E. & Harvey, T. (2008). *Employment/Day Options Interface Research Project: Final report*. Perth, Curtin University of Technology, School of Occupational Therapy and Social Work.

¹² Australian Government, DSS (2017). [Discussion paper: Ensuring a strong future for supported employment](#)

¹³ Australian Federation of Disability Organisations. (2018). [The future of supported employment in Australia](#)

¹⁴ National Disability Services. (2017). [Submission to the inquiry into career advice activities in Victorian schools](#)

George worked at an ADE for 34 years, 8am – 4pm Monday to Friday and eventually had to leave the ADE due to sexual harassment from another person with disability working there.

At the ADE they would yell at you.

When you finish the work they make up silly jobs for you to do. Like they make you sort out different parts and when you finish they mix them up again and make you do it all over again.

I done it all and then they went away and mix them all up again.

George, person with an intellectual disability

Recommendations

Recommendation 14 – Invest in a structural industry transition plan away from segregated employment in ADEs to supported and inclusive open employment.

Recommendation 15 – Establish a Centre of Excellence for Disability Employment and Specialist DES providers.

A Centre of Excellence will:

- Review all Information, Linkages and Capacity Building employment programs, and publish key evidence and expertise
- Deliver best practice evidence-based information about employment for people with an intellectual disability
- Design training for generalist DES providers
- Deliver capacity building for other agencies, such as NDIA
- Coordinate a Community of Practice
- Resource and support specialist DES providers
- Develop evidence-based guides and research about best practice school activities that support people with intellectual disability into open and self-employment
- Develop evidence-based guides and research about best practice school activities that support people with intellectual disability into open and self-employment
- Develop evidence-based resources for generalist DES about what how to deliver effective ongoing support for people with intellectual disability
- Develop evidence-based resources for employers about accessible induction practices

Recommendation 16 – DES providers that specialise in supporting people with intellectual disability should be established in each state and territory. If in place these specialist providers could:

- Be open to all people with an intellectual disability regardless of location, utilising online tools
- Implement evidence-based practice from Centre of Excellence research.
- Implement training of generalist DES providers
- Participate in Community of Practice
- Provide information and resources about open and self-employment options at school, to students with intellectual disability, their families and schools. Link to specialist SLES providers that focus on evidence-based pathways to open and self-employment

Recommendation 17 – Ensure people with an intellectual disability are referred to the specialist DES providers from all agencies, including Centrelink, NDIS and other employment services.

Improving labour force opportunities

This section responds to items 5.1, 5.2 and 5.3 - specifically addressing the role of social security settings and Disability Employment Services (DES); improving labour market outcomes for First Peoples with Disability, young people with disability, and people with disability from Culturally and Linguistically Diverse (CALD) backgrounds; and education and training provided as a prerequisite for employment.

Disability Employment Services (DES)

The Disability Representative Organisations have contributed extensively to Government consultations related to employment services and we are deeply disappointed by the lack of progress.

To create a truly supportive employment services system, the Government must adopt in full our detailed recommendations below. These recommendations consider social security settings as per item 5.1 in the Terms of Reference.

People with disability face systemic barriers to open employment that cannot be fully addressed by employment services and undermine the ability of employment services to support people into a sustainable job. But employment services are failing people with disability, and there are many opportunities to significantly address the deep flaws in the current model.

The recommendations outlined below are consistent with those included in PWDA's submissions to the Senate inquiry into the Disability Support Pension and the DSS Disability Employment Services (DES) review and are supported by the signatories of this submission. While they do not reflect our desire for a truly transformational change to employment services to fully support the needs of people with disability, we put them forward on the basis that they are straightforward for government to implement, would significantly improve upon the current system and provide a robust foundation for deeper work.

People with disability are discriminated against every day and this is exacerbated by Government systems that hinder, rather than help, those who want to pursue paid work.

The recent Disability Support Pension Senate Inquiry¹⁵ and the Disability Royal Commission, particularly the hearing on employment services¹⁶, have exposed shocking failures on behalf of the Government in its responsibility to uphold and advance the rights of people with disability in the labour market.

The organisations who support these recommendations are concerned by the extension of the Disability Employment Services model as it stands, for another 2 years.¹⁷ There is a significant need to overhaul employment policy to address major problems in the employment services system and to reorient towards a rights-based approach.

Without meaningful action now that is directly informed by disability peak organisations, the Government will consign another generation of people with disability to social and economic exclusion, and potential abuse by service providers and employers.

Recommendations

We strongly urge the Employment White Paper Taskforce to adopt the below recommendations that we collectively endorse:

Choice and control

Recommendation 18 – Remove compulsory participation requirements for people on Centrelink payments.

Participation requirements create and exacerbate disability. They discriminate against and disproportionately harm people with disability regardless of which Centrelink payment they receive.¹⁸ People with disability can least afford to be cut off their income support, and any such action further restricts their ability to access vital care and puts their health at risk.

In particular, we note that the Australian Government’s racially discriminatory remote “mutual” obligations program, the Community Development Program (CDP), has

¹⁵ Commonwealth of Australia (2022) [Purpose, intent and adequacy of the Disability Support Pension](#), accessed 23 November 2022

¹⁶ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (2022, 23-25 Feb). [Public hearing 21: The experience of people with disability engaging with Disability Employment Services](#), accessed 23 November 2022

¹⁷ Rishworth, Hon. A. (2022, October 25) [Ensuring people living with disability have the support they need](#) [media release], Ministers for the Department of Social Services, accessed 23 November 2022

¹⁸ People with disability are over-represented on working age Centrelink payments, including unemployment payments. 359,000 people on the JobSeeker payment (43% of total recipients) with partial capacity to work have a recorded medical condition or disability. The top two recorded conditions are psychosocial and musculo/skeletal and connective tissue. There are 9,000 people with an intellectual or learning disability. In the first half of 2021 there were 1.3 million payment suspensions applied to people with participation requirements. Sources: Department of Social Services (26 August 2022) 'DSS Demographics – June 2022' [dataset], [DSS Payment Demographic Data](#) accessed 12 October 2022; and Morton R (8 October 2022) [Exclusive: Leaked Burke speech sets stakes for welfare reforms](#), *The Saturday Paper*, accessed 13 October 2022.

been made voluntary and emphasise that it should not be replaced with a compulsory program.¹⁹

Recommendation 19 – Provide the resources for community-controlled and -led organisations to deliver employment services for First Peoples with disability.

Recommendation 20 – Ensure that any future federally funded employment services incorporate specialist services and inclusion experts who understand individual barriers to employment and help support culturally and linguistically diverse people with a disability and carers' access to employment.

Recommendation 21 – Ensure every working-aged person with disability has access to a range of government funded employment services that provide meaningful support and assistance getting a job, regardless of whether they receive a welfare payment or assessed work capacity.

Recommendation 22 – Develop employment services models that are structured (through outcomes payments and other mechanisms) to support people into meaningful jobs they are interested in and are likely to result in a career – not just any job. This should include promoting roles listed in the Skills Priority List²⁰ and working with employers to make these roles accessible. Linking people's interests with roles that are in demand will provide long-term career prospects.

Employment support

Recommendation 23 – Ensure people with disability have long-term ongoing workplace support, including the removal of existing time restrictions on the duration of post-placement support services.

Recommendation 24 – Introduce new requirements for all wage subsidy programs, in which subsidies are to be partially repaid if the placement does not lead to ongoing employment for at least 6 months after the subsidised period has concluded.

Recommendation 25 – Ensure people with disability receive an income that is no less than the minimum wage and implement a transition plan to end segregated employment by giving people working in Australian Disability Enterprises a pathway

¹⁹ In June 2021 when CDP was compulsory, 93% of 30,000 participants who received a payment suspension were Indigenous, and First Nations people experience disability (38%) at more than double the rate of the general population (18%). Sources: National Indigenous Australians Agency (2021) 'Community Development Program June 2021 Quarterly Compliance Data', *Community Development Program Quarterly Compliance Data*, Australian Government, Canberra, niaa.gov.au/resource-centre/indigenous-affairs/community-development-program-quarterly-compliance-data, accessed 12 October 2022; and First Peoples Disability Network (3 October 2022) 'NGO Submission on Australia's 7th Periodic Report' [submission], *Submission to the United Nations Committee Against Torture*, First Peoples Disability Network, Sydney, fpdn.org.au/policy-submissions, accessed 12 October 2022.

²⁰ National Skills Commission (2021) [Skills Priority List](#), accessed 23 November 2022

to open employment. This year people with disability working in ADEs could earn as little as \$2.37 per hour.²¹

Quality and oversight

Recommendation 26 – Prioritise and heavily weight the expertise, views and experiences of people using employment services when measuring program quality and outcomes.

Recommendation 27 – Establish an advisory panel comprising at least 80 per cent people with disability who are using employment services, to monitor program quality and provider performance on an ongoing basis. This advisory panel must reflect the diversity that exists within the disability community, ensuring the perspectives of First Nations people with disability, women with disability, LGBTIQ+ people with disability, young people with disability, culturally and linguistically diverse (CALD) people with disability and people with disability living in rural and remote areas are represented.

Recommendation 28 – Establish independent and impartial oversight of Disability Employment Services by an employment services ombudsman.

Recommendation 29 – Fully and sustainably resource a publicly delivered Centre of Excellence for Disability Employment and Specialist DES providers as per recommendation 15, which can operate as a knowledge hub that is staffed with disability, accessibility and inclusion experts.

Recommendation 30 – Require all employment service providers, including mainstream providers, to meet a core set of disability competencies and standards that adhere to both the social and cultural models of disability, rather than the medical model of disability.²² Providers must have the skills and expertise to deliver evidence-based employment programs for people with intellectual disability, cognitive impairment, autism, and psychosocial disability.

The following recommendations are only applicable if the advice our advice to remove compulsory participation requirements for income support recipients is not

²¹ [People with disability paid as low as \\$2.37 per hour in Australian Disability Enterprises | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)

²² According to the social model, 'disability' is socially constructed. The social model sees 'disability' as the result of the interaction between people living with impairments and an environment filled with physical, attitudinal, communication and social barriers. It therefore carries the implication that the physical, attitudinal, communication and social environment must change to enable people living with impairments to participate in society on an equal basis with others. In contrast to the social model of disability, which presents the deficit in terms of the built or social environment, a First Peoples cultural model of disability is based on enhancing wellbeing by fostering social inclusion, through the active participation of people with disability in community and cultural activities. A First Peoples cultural model is the only model that seeks to improve the human condition through positive affirmation, as distinct to merely negating the adverse impact of difference. Sources: People with Disability Australia, 'Social model of disability', *Resources*, pwd.org.au, <https://pwd.org.au/resources/models-of-disability/>, accessed 17 October 2022; Avery, S. (2018), *Culture is Inclusion: A narrative of Aboriginal and Torres Strait Islander people with disability*, First Peoples Disability Network (Australia), Sydney, Australia, p. 191.

adopted. The following recommendations below will not prevent all harm but will limit the potential for harm by protecting against some forms of abuse.

Recommendation 31 – Introduce capacity-building programs to support employers to create accessible and culturally responsive workplaces for people with disability, especially those belonging to multiple marginalised communities.²³

Recommendation 32 – Direct all employment services providers that no one be required to attend face-to-face meetings while COVID is still circulating in the community and presenting a higher risk to people with disability.

Recommendation 33 – Enable people with disability to access disability employment services and exercise full choice over the provider they use, regardless of geography, so that none are forced to use a mainstream provider. Participants must be able to easily transfer between providers without requiring approval from the provider, and there should be no limit on the number of times a participant may transfer. Any changes made to the Employment Services Assessment tool (ESAt) must not be used to reduce the number of people with disability accessing a disability employment services provider.

Recommendation 34 – Ensure any activity-testing requirements reflect people's individual capacity and needs and allow for people with disability to lead the development of their own job plans by permitting highly customised and flexible goals based on barriers and support needs. Providers must be required to implement a mandatory process at the first appointment to clearly communicate all service options and participant rights.

Recommendation 35 – Remove responsibility for policing compliance with participation requirements from providers. This should be achieved by moving this responsibility to the public sector under the newly established Digital Services Contact Centre or a similar body within the Department of Education, Skills and Employment that is tasked with managing compliance requirements.

5.2 Improving labour market outcomes for people with disability, First Peoples with disability, and intersectional groups

NEDA has pertinently noted that for people with disability a strength-based, person-centred approach to hiring practice must become front and centre of Workforce

²³ There is a dominance of employment programs, bundled under the euphemism 'capacity building', which target the upskilling of the jobseeker on the assumption that 'capacity' is where the problem lies. By contrast, little consideration is given to problems with the job-giver, including ongoing failures by employers to eliminate the physical and attitudinal barriers that exclude people with disability from the workplace. Source: Avery, S. (2018), *Culture is Inclusion: A narrative of Aboriginal and Torres Strait Islander disability*, First Peoples Disability Network (Australia), Sydney, Australia, pp. 133, 136.

Australia and Disability Employment Services. Employment must lead to meaningful job security to maximise an individual's ability to have financial security and economic participation. This is particularly evident when considering the situation to date for two cohorts: young people with disability and First Peoples with disability.

In the section below, Children and Young People with Disability Australia (CYDA) has provided insight from supporting young people to access employment, and in supporting them once they have gained employment, while the First Peoples Disability Network (FPDN) has provided insight about employment of First Peoples with disability.

Support young people with disability to find quality and secure employment

Key messages:

- Young people with disability are one of the most disadvantaged cohorts in the labour market because of the complex and multi-layered barriers they experience
- Australia lacks a national comprehensive, consistent and evidence-based approach to support young people find employment and overcome these barriers
- To see sustainable employment rates and outcomes, the government must invest in developing an evidence-base to understand how to effectively support young people with disability

Young people with disability are one of the most disadvantaged cohorts in the labour market and the barriers they experience in finding quality and stable work are complex and multi-faceted. This group are more than twice as likely to be unemployed than older adults with disability (25 per cent compared to 7.9 per cent).²⁴

To see sustainable change in the employment rates of young people with disability we make the following commendations.

Recommendations

Recommendation 36 – The Australian Government must protect the employment rights of young people. This includes:

²⁴ AIHW. (2022). [People with disability](#), accessed 23 November 2022

- a) Introducing Disability Standards for Employment to clarify the obligations of employers under the Disability Discrimination Act 1992. These Standards should include a clear definition of what constitutes a reasonable adjustment, with examples for employers of varying scope and across different industries
- b) Increasing funding to the Australian Human Rights Commission to support greater accountability and consequences for cases of employment discrimination
- c) Governments at all levels should invest in the enablers of successful employment service outcomes, including:
 - i. Person-centred practice and holistic approaches to service delivery prioritising the employment and career aspirations of young people
 - ii. Increased disability awareness among service providers and employers
 - iii. Focus on transition from school and provision of earlier employment support to young people
 - iv. Development of clear mechanisms for feedback and continuous improvement, ensuring that the experiences of people with disability remain at the heart of Employment Service practice

Recommendation 37 – The Australian Government should ensure service contracts, funding models, and Key Performance Indicators of employment programs address systemic barriers to employment and incentivise supporting the needs of individual jobseekers. This includes:

- a) Providing sufficient and up-front funding to support young jobseekers to overcome systemic barriers in the labour market
- b) Ensuring caseloads allow service providers to deliver personalised supports and demand-based activities, such as building employer networks
- c) Incorporating participant experiences and feedback as a measure of success
- d) Governments at all levels should deliver consistent post-school transition supports for students with disability in line with priority area two of the Employ My Ability Disability Employment Strategy

- e) The Australian Government should commission a review of funding arrangements in all states and territories for school and post school programs for students with disability

Supporting First Peoples with disability to find culturally responsive, accessible and secure employment

First Peoples with disability continue to be excluded from Australia’s economic prosperity, experiencing deeply entrenched poverty because of their skills and expertise being undervalued by the labour force.

The 2016 Australian Human Rights Commission Willing to Work inquiry found that First Peoples overall have lower labour force participation rates than non-Indigenous people (64.5% compared with 78.6%)²⁵, whilst the 2014-15 National Aboriginal and Torres Strait Islander Social Survey (NATSISS) found that First Peoples with severe and profound disability are almost twice as likely as First Peoples without disability to be unemployed.²⁶

These unsettling statistics highlight the way in which First Peoples with disability are consistently relegated to the fringes of Australia’s employment market. Mirroring social reality, First Peoples appear only as footnotes that address but one half of their reality at a time – either as a First People or someone with a disability. As Dr Scott Avery states:

*‘Aboriginal and Torres Strait Islander people with disability experience a unique form of ‘intersectional discrimination’ and social inequality that is an interaction of discrimination that is both Aboriginal and Torres Strait Islander and disability related. This intersectional inequality is acute and pervasive across all supports for Aboriginal and Torres Strait Islander people with disability...including employment’.*²⁷

Intersectional inequality is often overlooked in policy development, with separate and unconnected policies being developed for people with disability and for First Peoples, in turn failing to meet the specific needs of First Peoples with disability. It is therefore critical that the right of First Peoples with disability to economic security through employment be addressed with intentional and wholistic focus.

²⁵ Australian Human Rights Commission (2016) [Willing to Work: National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability](#), p. 176, accessed 23 November 2022.

²⁶ Avery, S., (2018). *Culture is inclusion: A narrative of Aboriginal and Torres Strait Islander people with disability*, First Peoples Disability Network (Australia), Sydney, p. 132.

²⁷ Avery, S., (2018). [Culture is Inclusion: A narrative of Aboriginal and Torres Strait Islander people with disability: Executive summary of findings](#), First Peoples Disability Network (Australia), Sydney, accessed 23 November

Improving employment outcomes for First Peoples with disability relies on addressing the structural barriers and forms of discrimination that employers commonly enable. Too often there is a dominance of employment programs, bundled under the euphemism of ‘capacity-building’, which target the upskilling of the job-seeker on the assumption that ‘capacity’ is where the problem lies.²⁸

However, as is highlighted in Dr Avery’s ground-breaking research, Culture is Inclusion, regardless of the skills or qualifications First Peoples with disability hold, this is unlikely to improve long-term employment prospects given both the realised and ‘apprehended’²⁹ incidences of racism, ableism, and intersectional discrimination our community is exposed to in employment practices.³⁰

One such example of structural racism and ableism locking many First Peoples with disability out of employment opportunities is the practice of criminal record checking. Aboriginal communities have long reported the serious barrier to employment posed by employers’ use of criminal record checks, irrespective of the relevance of the criminal history.³¹

Given the disproportionate criminalisation of First Peoples with disability, with the Australian Centre for Disability Law estimating that 95% of First Nations people charged with criminal offences have an intellectual disability, cognitive impairment or psychosocial disability³², the practice of criminal record checking must be understood as a key barrier preventing First Peoples with disability from labour market participation and economic security.

Removing barriers like these necessitates shifting focus to the ‘job-giver,’ acknowledging the elimination of physical and attitudinal barriers within the workplace as key in supporting First Peoples with disability to gain and sustain regular employment.³³

For First Peoples with disability living in rural and remote communities across Australia, attitudinal change amongst job-givers is especially critical, given the consistently low expectations and negative stigma many employers hold. Too often, employment services and individual employers in rural and remote communities cast

²⁸ Avery, S., (2018). *Culture is inclusion: A narrative of Aboriginal and Torres Strait Islander people with disability*, Executive Summary First Peoples Disability Network (Australia), Sydney, p. 133.

²⁹ ‘Apprehended discrimination’ can be understood as a pattern in psychological responses to the threat of discrimination. As a group becomes more personally exposed to discrimination, their understanding of discrimination transitions from an intangible judgment to an increasingly rational thought process, in the sense that every incident adds weight of evidence to their rational judgement of discrimination, its frequency and its impact upon them. Source: Avery, S., (2018). *Culture is inclusion: A narrative of Aboriginal and Torres Strait Islander people with disability*, First Peoples Disability Network (Australia), Sydney, p. 43.

³⁰ As above, pp. 133-137.

³¹ Slattery, S. and Robertson, D (2020). ‘Removing Barriers to Aboriginal employment’, *RMIT News*, accessed 13 December 2022. <https://www.rmit.edu.au/news/all-news/2020/may/removing-barriers-to-aboriginal-employment>

³² Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, December 2020, Overview of responses to the Criminal justice system Issues paper, p3.

³³ As above, p. 136.

aside the ambitions of First Peoples with disability and this results in a debilitating effect on their personal confidence.³⁴

Similarly, the core structural impediments to securing employment for First Peoples with disability living in rural and remote communities are rarely addressed in policy.³⁵ Extreme poverty, inadequate income support and a lack of basic infrastructure and services continue to make labour force participation inaccessible. As the National Disability Employment Strategy (NDES) emphasises, it can be difficult to access support for employment when people with disability are also ‘trying to meet basic needs such as housing, food and health, and/or dealing with issues of violence and abuse.’³⁶

For example, if there is no accessible public transport, or the price of fuel is unaffordable on an income support payment, how then is a First People with disability living in a rural or remote community expected to travel, potentially hundreds of kilometres away, to an employment agency or workplace?

As First Peoples Disability Network (FPDN) has long advocated for, one way to increase employment opportunities for First Peoples with disability, their families and carers is through the development of a Community Controlled First Nations Disability Sector. Investment in such a sector, especially in rural and remote communities, would see cultural and community inclusion act as a segue to economic inclusion, addressing a range of other concerns including:

- Increasing engagement with disability services (NDIS and other)
- Increasing disability-specific support across employment, justice, housing, and education
- Increasing capacity building and expertise across disability for Aboriginal and Torres Strait Islander services
- Meeting Closing the Gap outcomes and targets

Therefore, to see sustainable change in the employment rates of First Peoples with disability, we make the following recommendation.

³⁴ As above, p. 137.

³⁵ As above, p. 136.

³⁶ Department of Social Services (2021) [National Disability Employment Strategy Consultation Paper](#), p.14, accessed 23 November 2022

Recommendation

Recommendation 38 – Create and invest in a Community Controlled First Nations Disability Sector.

A Community Controlled First Nations Disability Sector, including services such as individual advocacy, would have significant positive outcomes across multiple services areas. Such a sector would not only enable formal recognition of the care many First Peoples already provide in our communities through paid employment, but, importantly, would serve as a culturally responsive and trusted employer of First Peoples with disability, offering strong, sustainable and self-determined employment opportunities for generations to come.

5.3 Skills, education, and training

Support young people with disability to gain post-school qualifications

CYDA has observed the substantial challenges faced by young people with disability to gain the post-school qualifications that provide the necessary skills and training for pre-requisite workforce entry.

Key messages:

- Young people with disability are not accessing post-school education on an equal basis to those without disability
- A major barrier for students with disability is accessing educational supports and reasonable adjustments
- The government must do more to support students with disability by increasing funding of the Higher Education Disability Support Program and taking a leadership role in supporting the Vocational Education and Training sector
- Tertiary institutions should support students with disability to transition into employment post qualifications

Young people with disability are not accessing post-school education, including university and Vocational Education and Training (VET), on an equal basis. Some positive changes include:

- the enrolment rates of students with disability in post-school education have increased³⁷
- the announcement in the October 2022 Federal Budget to create more opportunities to upskill, with fee-free TAFE and extra university places³⁸

However, young people with disability as a group remains grossly underrepresented in post school education settings when compared to the proportion of people with disability in the general population (18 per cent) (Figure 1).

Figure 1: Proportion of people with disability in post-school education settings and the proportion of people with disability in the general population

	%
Students with disability in higher education	7
Students with disability in VET	7
People with disability in Australian population	18

Sources: Department of Education, Skills and Employment 2018; ADCET VET Statistics 2018; NCCD 2018; Australian Bureau of Statistics 2018

A major barrier for students with disability participating in post-school education is the inadequate funding and effort for providing educational supports and reasonable adjustments. Despite the *Disability Discrimination Act* (Cth) and the accompanying Disability Standards of Education requiring providers to take reasonable steps to enable the student with disability to participate in education on the same basis as a student without disability, we know that many students' rights are not being upheld. Frequently, young people tell CYDA that the system puts the onus on students to understand their rights, fund the cost of required assessments for supports, self-advocate for their supports and challenge their institution when being treated unfairly.

Comments from young people within the CYDA community (2021) appear below:

One thing myself and other friends with disabilities find at my university is things like disability supports or psychology services are

³⁷ Koshy, P. (2020). [Equity Student Participation in Australian Higher Education: 2014 – 2019](#). National Centre for Student Equity in Higher Education (NCSEHE), Perth: Curtin University, accessed 23 November 2022.; Australian Disability Clearinghouse on Education and Training (2020). [Vocational Education and Training \(VET\) Statistics](#), accessed 23 November 2022

³⁸ Commonwealth of Australia (2022). [A stronger more resilient economy](#), accessed 23 November 2022.

incredibly difficult to access. It's not as easy as just calling up. Often times ... you won't get through, or there are massive backlogs. ... [I]t is very disheartening, and I think because of that a lot of people who need that support are not getting it, not because they're not making an effort to reach out and get it, it's just not available – although they advertise as such. Even when you're in the system it's incredibly hard to get that support.

The accessibility of materials that were handed to students in class was typically non-existent to me. I found that I missed out on a lot of information because it wasn't made in a format that I could read in a timely manner, so I was always behind. This meant the other students had an unfair advantage over me and I needed to work double harder to catch up.

A common defence education providers use when failing to provide adjustments for students with disability is that they do not have adequate funding to do so (the student must then take the burden on to challenge or complain the claim). While the national Higher Education Disability Support Program exists to provide 'funding to eligible higher education providers, to assist with supporting students with disability to access, participate and succeed in higher education'³⁹, the amount of funding allocated to this program is insufficient.

In 2020, only \$7.78 million of federal funding was spent through the program to support reasonable adjustments in higher education (generally universities) which equates to an average of \$110 per student.⁴⁰ Not only is the funding for reasonable adjustments per student grossly inadequate, but it has also more than halved⁴¹ in real terms since 2008.⁴²

The situation is even more bleak for students in the VET sector. Beyond the national Disabled Australian Apprenticeship Wage program which funds employers to hire trainees and apprentices with disability—which has had very limited impact on increasing participation rates—there is no nationally consistent approach, focus or commitment to supporting access by students with disability. While some states and territories do fund their own programs, there are only a handful around the country with varied approaches and limited and inconsistent funding.

³⁹ Department of Education, Skills and Employment. (2020) [Higher Education Disability Support Program](#), accessed on 23 November 2022

⁴⁰ Ford, E., & Swayn, D. (2021). *National Disability Coordination Officer Program: DRAFT tertiary education policy advocacy paper*.

⁴¹ Down from \$265 per student in 2008.

⁴² Universities Australia (2020) [Higher Education Facts and Figures 2020](#), accessed 23 November 2022

Recommendations

To support young people with disability to gain post-school qualifications, we make the following recommendations:

Recommendation 39 – Together with state and territory education departments, the Australian Government should develop and implement a nationally consistent post-school transition supports framework. This framework should:

- a) Include the core requirements of quality post school transition support as outlined in *Post School Transition: The Experiences of Students with Disability*, including beginning conversations and support in year nine
- b) Be evidence-based and outcomes orientated
- c) Include 'high-expectations' information resources for families and students with disability about post school options, application processes, and funding and subsidies available
- d) Include resources and follow-up supports and programs for young people no longer in school
- e) Include a strategy and linkages between schools and outside stakeholders, such as TAFEs, universities, and disability organisations
- f) Include data collection mechanisms that measure uptake, implementation, and outcomes of post school transition programs
- g) Include information about young people's employment rights

Recommendation 40 – The government must do significantly more to support the education sector. For higher education, there must be increased investment in the Higher Education Disability Education Support Program to at least match what is spent in the school system.

Recommendation 41 – In the VET sector, the Australian Government must also take a stronger role in convening a nationally consistent approach to supporting students with disability. This role should include a coherent funding mechanism to incentivise and support states and territories to deliver inclusive education.

Recommendation 42 – Tertiary institutions should support students with disability to transition into employment post qualification. This includes ensuring that career counsellors:

- a) Understand employability challenges students with disability face

- b) Have adequate knowledge of disability
- c) Have connections with disability-confident organisations that will support graduates with disability
- d) Understand what government services and supports are available to support students and graduates with disability

Conclusion

People with disability have long struggled to gain and maintain employment. The recommendations made throughout this submission provide an inclusive roadmap for changing this situation.

People with disabilities can and do make valuable contributions across every sector, and every level of employment but we need a critical mass of people with disability in the workforce at all levels to see economic security realised and barriers reduced. With the right adaptations to ensure accessibility and inclusive practice in the workforce there is potential to harness opportunities to increase the employment of people with disability and create a larger and more diverse workforce in the process.

Access to mainstream employment provides economic security, meaningful contribution to community, and social connectivity. The provision of adequate opportunities is a major gap for people with disability as a broad cohort as well as for groups of people within that cohort such as women with disability, young people with disability, First Peoples with disability, people from CALD backgrounds, and additional intersectional groups. We need to consider people from these groups in the development of the opportunities, and in the execution of them. This requires not only co-design but also co-implementation of new policies and programs to increase the employment of people with disability.

The DROs who have contributed to this submission call on the Australian Government to implement the recommendations we have made, and to work with us in ensuring that the future of the Australian workforce is truly inclusive and accessible for all Australians.

Appendix A

Below is a non-exhaustive list of previous submissions that Disability Representation Organisations have recently provided that are relevant to the Employment White Paper's Terms of Reference.

We encourage the consideration of these previous submissions alongside this submission.

2022

Department of Social Services Review of Disability Employment Services

[Submission](#) [hyperlink], People with Disability Australia

[Submission](#) [hyperlink], Children and Young People with Disability Australia

Research Review on Wage Equity and more choices in employment for people with intellectual disability

[Report](#) [hyperlink], Inclusion Australia and People with Disability Australia

2021

Senate Community Affairs References Committee's Inquiry into the Purpose, intent, and adequacy of the Disability Support Pension

[Submission](#) [hyperlink], First Peoples Disability Network

[Submission](#) [hyperlink], People with Disability Australia

[Submission](#) [hyperlink], Children and Young People with Disability Australia

Department of Social Services Review of the Disability Support Pension Impairment Tables

[Submission](#) [hyperlink], People with Disability Australia

[Submission](#) [hyperlink], Children and Young People with Disability Australia

Department of Social Services Consultations on the National Disability Employment Strategy

[Submission](#) [hyperlink], First Peoples Disability Network

2020

The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability's Employment Issues Paper

[Submission](#) [hyperlink], Women with Disabilities Australia

2019

Standing Committee on Community Affairs Inquiry into the Adequacy of Newstart and alternative mechanisms to determine the level of income support payments in Australia

[Submission](#) [hyperlink], People with Disability Australia