EQUAL PAY, EQUAL RIGHTS

OVERSEAS EXAMPLES

Inclusion Australia

INTERNATIONAL CASE STUDIES AND EVIDENCE

Setting the scene

In many cases, the barriers that exclude people with intellectual disability from open employment in Australia are reflected overseas. Internationally, people with intellectual disability are chronically underrepresented in the open labour force and continue to face systemic exclusion from full economic participation, contributing to higher levels of economic disadvantage and poverty compared with the rest of the population.[1] In many countries, segregated employment in group or center-based services such as sheltered workshops continues to be the norm.

At the same time, access to equitable, accessible and meaningful employment is also increasingly recognised globally as a means of full social participation and a pathway out of poverty.[2] While this is yet to be fully realised around the world while people with intellectual disability continue to face systemic exclusion, there is a growing body of international case studies that demonstrate the efficacy of full economic participation and inclusion of people with intellectual disability in open employment, including the implementation of legislative and policy strategies to support the successful transition away from sheltered workshops. These case studies will be discussed later in this section.

Challenges to international comparisons

Data

Among the barriers preventing people with disability from full participation in open employment is the lack of data and evidence that are comparable across international contexts.

Two recommendations that emerged from the *World Report on Disability*, for example, addressed the need for improved data collection and enhanced research on employment indices.[3] Lysaght et al. also point out that there is a clear need for improved reporting of relevant data and indicators of progress to improve economic participation among people with intellectual disability.[4]

The lack of common metrics internationally means researchers are often unable to accurately assess the ways different cultural, political, or economic environments affect the employment of people with intellectual disability, which would help pave the way for better outcomes.[5] Finally, without strong data on labour market participation, it is difficult to estimate the cost of unemployment to families and communities.

1 World Health Organization, & World Bank. (2011). *World report on disability*. World Health Organization: Geneva, Switzerland
2 Eric Emerson and Susan Parish, "Intellectual disability and poverty: Introduction to the special section", *Journal of Intellectual & Developmental Disability*, 35:4, 2010: 221-223, DOI: 10.3109/13668250.2010.525869
3 World Health Organization, & World Bank. (2011). *World report on disability*, 18.
4 Rosemary Lysaght, Jan Šiška, and Oliver Koenig. "International Employment Statistics for People With Intellectual Disability-The Case for Common Metrics." *Journal of Policy and Practice in Intellectual Disabilities* 12, no. 2 (April 29, 2015): 112–19. https://doi.org/10.1111/jppi.12113.
5 Lysaght, "International Employment Statistics", 115.

Definitions

There is a lack of consistency of definitions for what constitutes work; intellectual disability; and even what constitutes a sheltered workshop itself in an international context.

Despite the prevalence of sheltered workshops globally, there are a number of differences in characteristics and practices across national and regional contexts, often arising from the varied understandings and intentions of the purpose of this form of employment.

As such, sheltered or segregated work occurs under a variety of names, ranging from 'Work Centre' in some states in the US to 'Occupational Activity Centre' in Portugal and 'Social Enterprise' in Kuala Lumpur. And because sheltered workshops tend to have evolved from religious or medical institutions with the objectives of charity or medical and therapeutic treatment, sheltered workshops around the world continue to be associated with this ethos. As May-Simera writes,

> "this hybrid of treatment, training and work interventions gives sheltered work settings a broad mandate and makes comparisons difficult and at times confusing".[6]

This can, May-Simera continues, lead to confusing legal statuses, making participants in these systems "eternal clients or patients"[7] rather than workers.[8]

Because of the common historical roots (medical, religious) of sheltered workshops globally, there are certain common indicators across international contexts that are useful to note. For example, as is the case in Australia, sheltered workshops overseas are 'sheltered' or separate from general, 'mainstream' work settings, very often geographically isolated from urban or central business districts, and provide work almost exclusively for people with disability alongside other disabled people.[9]

Most often they are run by non-governmental organisations, not-for-profit or other independent service providers, with the day-to-day organisation overseen by supervisors or trainers.

Work undertaken in sheltered workshops typically involves tasks ranging from "clerical activities..., assembling, packing, woodwork, manufacturing, servicing, sewing, or sheet metal work",[10] and there are several studies commenting on what is often the menial or meaningless nature of these tasks.[11]

Below, we apply a conceptual definition to the international context, borrowing that used by the International Labor Organisation and explained by May-Simera as being: "that act of placing predominantly people with intellectual disabilities in sheltered employment or work facilities where they are subject to atypical working conditions, for an extended period of time".[12]

The international examples in this section demonstrate how the transition to open employment is achievable and in many cases has been successful, creating far reaching benefits to both people with intellectual disability, the wider community and economy.

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6 Charlotte May-Simera, "Reconsidering Sheltered Workshops in Light of the United Nations Convention on the Rights of Persons with Disabilities (2006)." Laws 7, no. 1 (February 5, 2018): 4.
7 May-Simera, "Reconsidering Sheltered Workshops", 2.
8 Mallender, Jacqueline, Quentin Liger, Rory Tierney, Daniel Beresford, James Eager, Stefan Speckesser, and Vahé Nafilyan. "Reasonable Accommodation and Sheltered Workshops for People with Disabilities: Costs and Returns of Investments," 2015. https://www.europarl.europa.eu/RegData/etudes/STUD/2015/536295/IPOL_STU(2015)536295_EN.pdf.
9 May-Simera, "Reconsidering Sheltered Workshops", 2.
10 May-Simera, "Reconsidering Sheltered Workshops", 3-4. Alberto Miglioire, "Sheltered Workshops" in International Encyclopedia of Rehabilitation. Edited by John H. Stone and Maria Blouin. Buffalo: Centre of international Rehabilitation Research Information and Exchange, Available online: http://cirrie.buffalo.edu/encyclopedia/en/article/136/ (accessed on 15 February 2016).
11 Alberto Migliore, Davi Mank, Tara Grossi, and Patricia Rogan. "Integrated Employment or Sheltered Workshops: Preference of Adults with Intellectual Disabilities, their Families and Staff" Journal of Vocational Rehabilitation 26. 2007: 5–19.
12 May-Simera, "Reconsidering Sheltered Workshops", 2;

The Supported Employment model

A note on terminology

In Australia, readers may be more familiar with Supported Employment as meaning employment in segregated or congregated disability-specific employment, which are largely couched in Australian Disability Enterprises (ADEs).

In this section, this is not what we mean by Supported Employment.

Supported Employment is used here to capture the range of practices and programs internationally, as it is consistent with the original theory and practices emerging in the US and applied in different parts of the world since the 1980s.

Therefore, Supported Employment is used here to refer to activities that promote the employment of people with intellectual disability in open employment.

Historical background to Supported Employment

Several of the case studies below discuss the successful transition away from sheltered workshops towards open employment through the model of Supported Employment (SE), which first emerged in the early 1980s to address the systemic exclusion of people with intellectual disability from the open workforce and put forward an alternative to segregated forms of employment.[13]

In its philosophy and applications in policy, SE reflects what is referred to as 'open employment' in Australia. In contrast to the ethos of sheltered workshops, SE involves a 'place then train' approach, where individuals are supported to receive training in everyday workplaces (referred to as Competitive Integrated Workplaces or CIE), develop relationships with employers and coworkers, and earn living wages.[14]

The basic principles of SE are:

- Personalised individual assessment to assist individuals to become confident in their ability to succeed in employment, refine their employment preferences, and identify the training and support needed for success;
- Individualised job development and placement by an employment specialist (usually called a job coach)
- Intensive job site training and support; and
- Ongoing support throughout the course of the individual's employment.[15]

Research on the SE model expanded during the 1980s and 90s. Despite initial criticism that reflected the low expectations of the employment potential of people with intellectual disability, the model was applied to various small case studies in the US before larger studies eventually began to shift policy and practice–particularly in the State of Vermont, which is discussed below.

The SE model is related to a number of theories and models around inclusive work, and social inclusion more broadly. For example, there are clear links to normalisation ideology that was the basis for de-institutionalisation in many countries and the Employment First model, which is used to inform policy in several States in the US.

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13 John Kregel, Wehman , P, , Taylor, J., Avellone, L, Riches, V., Rodrigues, R., & Taylor, D. A Comprehensive *Review of Evidence-Based Employment Practices for Youth and Adults with Intellectual and Other Developmental Disabilities: Final report.* Rehabilitation Research and Training Center at Virginia Commonwealth University in Richmond, Virginia and Centre for Disability Studies, affiliated with the University of Sydney, Australia, 2-4. See also: Frank Rusch, *Competitive employment issues and strategies.* Baltimore: Paul H. Brookes, 1986; John Kregel, "Why It Pays to Hire Workers with Developmental Disabilities" Focus on Autism and Other Developmental Disabilities, 14(3), 1999: 130–132. https://doi.org/10.1177/108835769901400301; Paul Wehman, *Competitive employment: New horizons for severely disabled individuals.* Baltimore, MD: Brookes, 1981.

14 Kregel et al., *A Comprehensive Review of Evidence-Based Employment Practices*, 5.

15 Kregel et al., *A Comprehensive Review of Evidence-Based Employment Practices*, iii-iv.

It is useful to note that the applications of inclusive work in different international contexts tend to share the same fundamental principles originally put forward in SE, with only nuanced differences in their application around the world.

The services that have emerged internationally since the theoretical development of SE demonstrate effective and replicable alternatives to segregated forms of work. As Bryan Dague writes, they have been "developed from a philosophy that presumes competence and employability of everyone given the proper supports are provided".[16]

The policy changes brought about by SE internationally have raised expectations about the capabilities and competence of people with intellectual disability and "led to a paradigm shift from segregated employment to competitive integrated employment as the preferred outcome for all individuals",[17] employees and employers alike.

Markers of successful transitions toward open employment internationally

There is now a large body of evidence that demonstrates the efficacy of the SE model as a successful alternative to sheltered workshops. The attributes below, which show up in the international case studies, are markers of success that lead to increased employment for people with intellectual disability. They include:

- The presumption of employability among parents, educators, employment services and the wider community;
- A high level of job customisation to suit the needs and interests of the individual with intellectual disability and the employer, including job carving, job sharing and job creation;
- Proactively seeking job opportunities and connecting individual job-seekers to employers, instead of waiting for job vacancies to be advertised;
- On-the-job training or on-site training mixed with work experience;
- Time unlimited support in the workplace to continue to acquire work-related skills and capacity to independently access and maintain employment;
- The role of employment brokers or vocational specialists to work across disability support services, health services (such as mental health services), employment services, training organisations, schools, employers, families and jobseekers, based on evidence-based models of practice.

As Wilson and Campain summarised in their recent review of international evidence, successful transitions toward open employment involve:

> a combination of highly individualised strategies (focused on the unique attributes of the person with intellectual disability and their context) supported by programmatic structures that deliver a range of supported opportunities.[18]

16 Dague, Bryan. "There's No Sheltered Workshops in Vermont ." Voice , August 2018. Down Syndrome Australia. https://www.downsyndrome.org.au/voice/wp-content/uploads/sites/4/2020/03/There-is-no-sheltered-workshops-in-Vermont-Voice-August-2018.pdf.

17 Kregel et al., *A Comprehensive Review of Evidence-Based Employment Practices*, 5.

18 Erin Wilson and Robert Campain, *Fostering employment for people with intellectual disability: the evidence to date*, Hawthorn, Centre for Social Impact, Swinburne University of Technology, 2020: 9.

Wage subsidised employment

Another attribute that is sometimes used alongside SE practices, especially in Scandinavian countries, is wage subsidised employment. This is where a certain type of tax-financed subsidy is provided to employers to incentivise the hiring and sustained employment of individuals, meaning the individual is hired and paid in normal conditions.

Subsidies tend to vary in size depending on assessments of the individual's capacity to work. They are generally given over a limited time period, and often have to be renegotiated annually or after a few years.

There are very few studies documenting the effects of such policies aimed at incentivising and enhancing the employment of people with disability–and in particular intellectual disability.[19]

A recent scoping review looking into the efficacy of wage subsidies to promote employment of people with disability (not specifically intellectual disability) found that while financial incentives are widely used in developed countries, "the current state of the literature is modest and insufficient to make strong statements about the evidence on how and when financial incentives work well or do not work well".[20]

Broadly speaking, financial incentives for employers are varied: they may be wage subsidies, tax credits or benefits, penalties for not achieving employment targets, reimbursement of costs associated with accommodation (that is, changes to working conditions or provision of support to increase accessibility). These different incentives still need to be distinguished in this policy arena.

Although it is difficult to substantiate, Irvin et al. note the varied perceptions among employers, disability advocates and people with disability about the use of wage subsidies. Some feel they are a critical policy lever to promote employment and retention of people with disability, particularly in small and medium sized workplaces with little experience in hiring people with disability and limited resources to do so. Others however feel they are merely used by employers to get cheap labour and may be an avenue for abuse and exploitation.[21]

Further, there is evidence that wage subsidies stimulate labour demand and create an incentive for employers, including by reducing employers' uncertainties about employing a person with an intellectual disability.[22] At the same time, wage subsidies have been shown to contribute to stigma by signalling a so-called 'poorer work capacity'.[23]

Sweden offers an interesting snapshot of the efficacy of a wage subsidy model. Because their system allocates wage subsidies to individuals through an assessment of 'reduced work capacity' through a coding system, the data available relates to people with disability as opposed to intellectual disability specifically.

The Swedish wage subsidy program (lönebidrag) was introduced in 1980 and remains the single largest labour market programs in the country. It can be accessed by employers for an initial run of one year, and can be extended for up to four years. This can be extended in some circumstances, but this needs to be renegotiated through the Public Employment Service (PES).[24]

In 2017, the ceiling for the subsidy was EUR1670 per month. This needs to be claimed by the employer on a monthly basis and is paid back in arrears.[25]

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19 Emma Irvin, Emile Tompa, Heather Johnston, Kathy Padkapayeva, Quenby Mahood, Dan Samosh, and Rebecca Gewurtz. "Financial Incentives to Promote Employment of Persons with Disabilities: A Scoping Review of when and how they Work Best" *Disability and Rehabilitation* ahead-of-print (2022): 1-15.
20 Irvin, "Financial Incentives to Promote Employment of Persons with Disabilities", 1.
21 Irvin, "Financial Incentives to Promote Employment of Persons with Disabilities", 2.
22 Nikolay Angelov and Marcus Eliason. "Wage Subsidies Targeted to Jobseekers with Disabilities: Subsequent Employment and Disability Retirement." *IZA Journal of Labor Policy* 7, no. 1 (December 2018). https://doi.org/10.1186/s40173-018-0105-9.
23 Stijn Baert, "Wage Subsidies and Hiring Chances for the Disabled: Some Causal Evidence" *The European Journal of Health Economics* 17 (1) 2016: 71-86.
24 Helena Taubner, Magnus Tideman and Carin Staland Nyman, "Employment Sustainability for People with Intellectual Disability: A Systematic Review." *Journal of Occupational Rehabilitation* 32, no. 3 (December 27, 2021): 353–64. https://doi.org/10.1007/s10926-021-10020-9.
25 Angelov and Eliason, "Wage Subsidies Targeted to Jobseekers with Disabilities: Subsequent Employment and Disability Retirement", 27.

It is estimated that about one in ten in the working-age population has a so-called 'reduced working capacity'. In a recent study, Angelov and Eliason analysed participants in the wage subsidy program over 19 years to assess future labour market outcomes. Particularly, the relationship between the wage subsidy, job retention and eventual non-subsidised employment.

The results were mixed. The study found that participants in the wage subsidy program were less likely to leave the labour market early through the disability insurance program. It also found that participants in the wage subsidy program experienced overall higher employment rates in the long term compared with non-participants. However, participants were less likely to have non-subsidised employment in the long-term.[26]

The authors note that the interpretation of this finding is complex: a pessimistic interpretation is that the program led to being 'locked in' to subsidised employment, which limited opportunities to transition to regular, non-subsidised employment. More optimistically, it could be argued that those individuals may not have been able to gain and retain employment without a subsidy.

This also leads the authors to question what the goal of a wage subsidy is: remaining employed, or becoming employed without a subsidy. This remains an open question.

International case studies on the transition away from sheltered workshops towards open employment

The case studies below are snapshots of the strategies outlined above in action. The countries and cities were chosen to provide a diversity of models and mechanisms.

While the different examples described are, in some cases, still in their infancy and marked by complex challenges, they demonstrate the ways in which different places around the world are moving away from segregated forms of work to ensure people with intellectual disability can access and maintain work in open employment.

Vermont, United States

In 1980, there were approximately 1400 individuals in sheltered workshops throughout Vermont. In 2002, Vermont's last sheltered workshop was closed. Currently, the rate of employment of people with intellectual disability in Vermont is twice the US national average. Unsurprisingly, Vermont is widely recognised internationally as setting the standard for the successful transition away from sheltered workshops towards supported employment in the open labour market.[27]

Influenced by the research and evidence on SE in the early 1980s, the University of Vermont piloted an integrated employment program in partnership with state disability service providers and advocacy organisations, called the S*upported Employment System Change Initiative*.

The program recruited workers from a sheltered workshop in Barre to participate, where they were supported to find community-based employment with on-the-job training provided by job coaches.[28]

The success of this pilot program was followed by a five-year federal systems change project to support the transition of people with intellectual disability to open employment.

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27
28

The state of Vermont supported the emerging SE services through continued funding, which included a range of state supported employment positions and a technical assistance program established at the University of Vermont, which came about to provide an avenue for higher education and training for people with intellectual disability. Vermont's business community also became a strong ally of the change by consistently hiring employees and supporting the principles of supported employment.

The funding model put forward by the state of Vermont appears to be key to the successful transition and gradual conversion of sheltered workshops. The *State System of Care Plan for Developmental Disability Services* emphasised integrated employment as a priority, and made budgetary plans to limit, and then over time eliminate, funding for sheltered workshops.[29]

An important part of Vermont's strategy was that it was collaborative. The State Divisions of Vocational Rehabilitation and Developmental Disabilities worked with disability service providers who managed sheltered workshops to convert them before the funding changes came into effect.

As Sulewski notes, this avoided "pulling the rug out" from under providers and individuals who worked in sheltered workshops, as well as their families.[30] Vermont's state Division of Disability and Aging Services, with the University of Vermont and service providers of sheltered workshops, worked together to convert the remaining workshops to community-based options with individualised support, following the principles of SE.

Throughout the process, there was continued open communication with stakeholders: Vermont's state agencies and University worked with providers at each step to address their concerns and aid workshop conversion before eliminating funding. This collaboration between governmental departments, Self-Advocacy and Advocacy groups, service providers and the University of Vermont continues today.

The strength of Vermont's Self Advocates–people with intellectual disability campaigning and speaking up for their own rights–also appears to be a key driver of success. Green Mountain Self-Advocates are active across 18 regions of Vermont and were a strong voice in the push for change during the 1980s and 90s. Today, they continue to promote open employment by educating the public about the "strengths, rights, wants and needs of people with developmental disabilities".[31]

Today, Vermont's Supported Employment Program (SEP) is overseen by two State government divisions: Developmental Disability Services (DDS) and Vocational Rehabilitation (VR) and is implemented across 16 not-for-profit agencies.

The program delivers a range of individualised SE services, including:

- person-centred planning;
- job search and matching;
- on-the-job training;
- follow-up services and support;
- equipment and transport where required; and
- career enhancement.

The annual budget is mainly provided by DDS (US$9-10 million) and partially by VR (US$1.3 million). The cumulative per-person costs of the SEP are dramatically less than the cost of sheltered workshops in Vermont, at US$6,618 compared to US$19,388 per person per year.[32]

A 2015 survey indicated that 90% of workers using the SEP enjoyed their current job and 52% felt they were able to work sufficient hours.

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29 Vermont Agency of Human Services and Department of Aging & Independent Living. "Vermont State System of Care Plan for Developmental Services: Three Year Plan 2005-2007," July 2004. https://www.communityinclusion.org/pdf/VT_Plan_05-07.pdf

30 Jennifer Sulewski, "Shifting resources away from sheltered workshops in Vermont" Boston: University Massachusetts, Institute for Community Inclusion, 2007.

31 Max Burrows, "Equal Employment for Persons with Disabilities." Green Mountain Self-Advocates, June 26, 2020. https://gmsavt.org/resources/equal-employment-for-persons-with-disabilities.

32 Roy Gerstenberger, Jennie Masterson and Bryan Dague, "Long-term inclusion in the open labour market, state-wide", Zero Project, accessed 23 November 2022, https://zeroproject.org/view/project/bfb4b4e2-9f17-eb11-a813-0022489b3a6d

Oregon, United States

Following the legislative changes that took place in the US in the late 1990s and early 2000s–including the Americans with Disabilities Act (ADA),[33] which led to a series of federal grants towards supported employment services–the state of Oregon underwent a series of policy changes that put forward an Employment First policy strategy, through which individualised support and employment in the open workforce was prioritised, marking the first move away from sheltered workshops.

In January 2012, a class action was filed by eight individual plaintiffs with intellectual or developmental disability, alongside the United Cerebral Palsy of Oregon and Southwest Washington, on behalf of the thousands of participants in Oregon's sheltered workshops.

This was the first class action that had ever challenged segregated forms of work that pay subminimum wages to people with intellectual and developmental disability in segregated environments. Lane v. Brown,[34] which was settled in 2015, charged state officials with violating the ADA by excluding people with disability from open employment and confining them to segregating settings where they were denied a living wage.

Among the significant outcomes of the action was the finding by US District Court Judge Janice M. Stewart that the integration mandate contained in the ADA applies not only to residential settings but to employment, meaning that people with intellectual disability must receive employment services in integrated settings in the open workforce.

The Settlement Agreement reached in 2015 determined that the state must provide 7,000 individuals with employment services. In summary, the state must:

- provide individualised support services–including career development planning and training–that lead to real jobs in the open workforce at equal pay for people in sheltered workshops;
- provide individualised services that lead to the employment of young people (aged 14-24) with intellectual disability in public schools;
- ensure people with intellectual disabilities can obtain the services they need to be able to work in open employment by implementing funding and building capacity among employment service providers; and
- Close all sheltered workshops by July 2022.[35]

An independent review of progress made on implementing the Agreement shows that since 2015, the State has:

- Closed all remaining sheltered workshops;
- eliminated the use of sub-minimum wages;
- increased access to supported employment services and access to CIE, meeting and surpassing the numerical goals set out in the Agreement (7,000 individuals);
- expanded evidence-based transition practices;
- developed the agency infrastructure across service providers to support the Agreement; and
- utilised enhanced federal and state funding to support access to CIE and create a statewide data system.[36]

The recent independent review noted that, as is the case in many countries across the world, Oregon lacks appropriate metrics for measuring success in creating access to CIE. It recommended developing new metrics for a range of data, as well as standards to assess compliance with the State's commitment to provide services that are genuinely individualised.

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33 Title I of *The Americans with Disabilities Act* prohibits discrimination again people with disability in employment and allows people to access necessary employment supports by legislating the right to ask for "any change to the application or hiring process, to the job, to the way a job is done, or the work environment" that allows a person access to the necessary supports in the workplace. Americans With Disabilities Act of 1990, 42 U.S.C. 12101 et seq.

34 This case was originally filed as Lane v. Kitzhaber.

35 Nicole Jowic, J.D. "Lane V. Brown: Final Report to the Court", Civil Action No. 3:12-cv-00138-ST., Independent Review, 2022.

36 Disability Rights Oregon. "Lane v. Brown — Disability Rights Oregon." Project Independence , January 26, 2012. https://www.droregon.org/litigation-resources/lane-v-brown..

Norway

It is estimated that 5.6% of people with intellectual disability in Norway are employed:[37] 2% are in open employment while approximately 10% participate in sheltered workshops.[38]

The first SE program to be piloted in Norway was completed in 1995, with mixed results. On the one hand, 74% of participants were able to secure a job in the private sector, nearly half of those in full-time positions. However, an evaluation in 2001 found that the number of people still working in those jobs had fallen to 11%.

The most significant learnings from this initial project was that success depends on the level of sustained contact and support from a job coach and extent to which support services are individualised. Further, the initial SE program was run through non-government sheltered workshop providers rather than, as happened later, the Public Employment Service (PES).

Through the early 2000s, the main challenges for Norway included the lack of common definitions of SE and the fact that employment support services were split between different non-governmental agencies. This meant that the country had several "SE-like programs"[39], but there was little evidence that these led to sustained jobs for people with intellectual disability, and many continued to be run by sheltered workshop providers.

In 2016, Norway committed to a Public Employment Service (PES) practice for SE as part of the European Commission's Employment Strategy. The scheme is run by the Norwegian Labour and Welfare Administration (NAV) and focuses on the 183,000 young people who are registered as having "reduced working capacities", including young people with intellectual disability.

The scheme involved:

- the employment of "SE Specialists"--job coaches, counsellors and advocates;
- setting up interdisciplinary youth teams across the country;
- establishing contact with employers in the private sector;
- establishing guidelines within the PES office on inclusion competence and the principles of SE

By 2018, approximately 6000 young people had been supported to find employment. According to NAV, the program continues to successfully support the transition to CIE, demonstrating the markers below as key to its success:

- small caseloads of 12-20 job-seekers per job coach/counsellor;
- ongoing knowledge and capacity building on the principles of SE and inclusive practices;
- commitment from leaders in government, PES offices, case workers and social services; and
- including job seekers themselves in the design and development of support services.[40]

37 Sofie Wass, Mugula Chris Safari, Silje Haugland, and Hans Olav Omland. "Transitions from School to Sheltered Employment in Norway – Experiences of People with Intellectual Disabilities." *British Journal of Learning Disabilities* 49, no. 3 (July 26, 2021): 373–82. https://doi.org/10.1111/bld.12414.

38 Øystein Spjelkavik,"Supported Employment in Norway and in the Other Nordic Countries." *Journal of Vocational Rehabilitation* 37, no. 3 (2012): 163–72. https://doi.org/10.3233/jvr-2012-0611

39 Wass, "Transitions from SChool to Sheltered Employment in Norway", 379

40 European Commission. "Norway: Supported Employment", PES Knowledge Centre - Employment, Social Affairs & Inclusion, October 2021. Accessed November 23, 2022. PES Knowledge Centre - Employment, Social Affairs & Inclusion - European Commission (europa.eu)

Sweden

Like Norway, Sweden also has a Public Employment Service (PES) practice for SE. While this program is not specifically directed at people with intellectual disability, but rather people with so-called 'reduced working capacity', people with intellectual disability can access support for open employment through this scheme.

The 'Special Introduction and Followup Support'[41] (SIUS) began in 1998 as an employment support service for job seekers in need of individual support for finding, retaining or returning to CIE. Support is provided both to the jobseeker and the employer by a SIUS consultant with specific expertise in inclusive practice and SE.

As a scheme managed by PES, it is funded by the government and involves the following elements:

- supporting individuals to find work related to their skills, preferences and interests;
- supporting the hiring process;
- work introduction and training with support through 3-6 month unpaid internships;
- employment with follow-up support at the workplace–this support can be accessed for up to 2 years after initial employment, and in certain cases may be extended beyond this.

In 2017, 912 SIUS consultants supported 9232 job seekers to secure work in CIE.[42] However, given SIUS has a broad mandate for work inclusion, people with intellectual disability do continue to work in sheltered workshops, and it does not appear that SIUS has been targeted at transitioning people away from segregated work.

A national survey analysing 12,269 former students with intellectual disability about their employment experiences after school showed that just 22% worked in CIE while 47% worked in sheltered workshops or day centres.[43]

At the same time, the existing SE infrastructure offers a potential pathway for participants of sheltered workshops to access open employment. This is further supported by Sweden's wage subsidy model, where employers of workers with disability are entitled to a subsidy of up to 80% of wage for up to four years, with possibilities for extension.[44]

A recent qualitative study focussing on experiences of SE services in Sweden found that inclusion in the open workforce led to a greater sense of belonging in one's wider community and a feeling of "being something to somebody" by being valued in the workplace.[45]

41 In Swedish, 'Särskild stödperson för introduktions-och uppföljningsstöd'.

42 European Commission. "Database of Labour Market Practices - Employment, Social Affairs & Inclusion", accessed 23 November, 2022. https://ec.europa.eu/social/main.jsp?catId=1080&langId=en&practiceId=69.; European Commission. "Mutual Learning Programme Database of National Labour Market Practices: Sweden - Special Introduction and Follow-up Support (SIUS)", April 2018, accessed 23 November 2022, MLP Practice (europa.eu)

43 Spjelkavik,"Supported Employment in Norway and in the Other Nordic Countries", 163.; See also Jessica Arvidsson, Stephen Widen and Magnus Tideman, "Post-school options for young adults with intellectual disabilities in Sweden" *Swedish Disability Research: What Lessons for Australia*? 2(2) 2015: 180-193. https://doi.org/10.1080/23297018.2015.1028090.

44 Johanna Gustafsson, Julia Peralta, and Berth Danermark. "Supported Employment and Social Inclusion – Experiences of Workers with Disabilities in Wage Subsidized Employment in Sweden." *Scandinavian Journal of Disability Research* 20, no. 1 (2018): 26–36. https://doi.org/10.16993/sjdr.36.

45 Gustafsson, "Supported Employment", 28.

Bangladesh

In 2019, Bangladesh developed the National Disability Action Plan to promote the implementation of Article 27 of the UNCRPD. Activity 10 of the Action Plan sets targets related to the employment of people with disability in CIE, including the preservation of a quota system and "provision of reasonable accommodation", which enables people with disability to access support to secure and sustain employment.

However, these mandates are not specifically targeted towards people with intellectual disability, and legislation to protect the rights of people with intellectual disability is not sufficiently enforced. A recent report by Down Syndrome International (DSi) suggests that a range of structural barriers, together with entrenched community attitudes, work to exclude people with intellectual disability from the workforce.[46]

Despite this, a number of programs developed in the not-for-profit sector towards inclusive employment for people with disability have resulted in new partnerships and infrastructure to promote the employment of people with intellectual disability.

Education and training as a pathway to open employment

Since 2014, the PFDA Vocational Training Center (PFDA-VTC) has been supporting people with intellectual disability to gain open employment. Offering individualised vocational training programs, the PFDA-VTC facilitates job-matching with employers and ongoing support to employees, overseeing the employment conditions to ensure equal pay and benefits are being met.[47]

Although the PFDA-VTC also oversees a sheltered workshop, it reports more than 70% of its vocational training students have secured a job in open employment since 2014.

Connecting the business community with jobseekers

Responding to the lack of platforms to match companies with job-seekers with disability, employers from the private sector founded the Bangladesh Business and Disability Network (BBDN) and launched a series of job fairs to bring together employers, disability service providers, self-advocates and NGOs. Their aim was to share experiences and knowledge of inclusive employment, generate networking and provide an avenue for employers and job-seekers to find each other.[48]

The establishment of the BBDN has meant that disability service providers and other NGOs are no longer alone in coming up with solutions to enable greater inclusion in the workforce. The BBDN runs regular meetings and employer-trainings to discuss best practice for inclusive employment, and between 2017 and 2021 have run four job fairs in Dhaka, Chattogram and Sylhet.

46 Ishaque Mia, "Case Study on Best Practices in the Inclusive Employment of Persons with Intellectual Disabilities in Bangladesh." Edited by Nathan Rowe. Bangladesh: Down Syndrome International, September 2021. https://www.ds-int.org/inclusive-employment-case-study-and-webinars; Bialik, Kimber, and Manel Mhiri. "Barriers to Employment for People with Intellectual Disabilities in Low and Middle-income Countries: Self-advocate and Family Perspectives." *Journal of International Development* 34, no. 5 (June 14, 2022): 988–1001. https://doi.org/10.1002/jid.3659.

47 Zero Project. "PFDA - Vocational Training Center Trust." Accessed November 23, 2022. https://zeroproject.org/view/organization/c248b307-9304-eb11-a813-000d3ab9bc3d; PFDA - Vocational Training Center. "Our History." Accessed 23 November 2022. https://pfda-vtc.org/about-us/our-history/

48 Zero Project. "Establishment of Business and Disability Network to Facilitate Employment," January 2021, accessed 23 November 2022. https://zeroproject.org/view/project/f1defc32-ad12-eb11-a813-0022489b3a6d

Canary Islands

Since the first Spanish law to recognise the right to full social integration of people with disability was passed in 1982, a number of advocacy organisations and service providers have begun to manage SE models in the Canary Islands. The first SE model was set up in Tenerife in 1994 by the Island Council, with the objective of promoting access to open employment for people who had traditionally been employed in sheltered workshops, known as 'occupational centers'.[49]

Beginning by working with the tourism sector to support the training and employment of people with intellectual disabilities, the program's success saw its expansion to a permanent service with a permanent staff of job coaches. In the late 1990s, the program was entrusted to a public institution, Sinpromi, which is owned by the Council of Tenerife. Since then, Sinpromi has supported more than 700 individuals to access open employment.[50]

Although there are challenges associated with this and comparable projects in the Canary Islands– for example, job coaches and other supports included in the SE model are not recognised as professions in the *National Code of Occupations*, meaning supply does not meet demand–research suggests that such transition projects are successful, and are actively encouraging the employers "to highlight the values of inclusion, solidarity, and respect for diversity as strategic management elements that increase their value".[51]

Canada

Ready, Willing and Able (RWA) is a government-funded national partnership of Inclusion Canada, Autism Alliance of Canada and their member organisations that began in 2014. The program aims to increase the participation of people with intellectual disability and those with ASD in open employment, who currently have an employment rate of about 20%.[52]

Primarily RWA does this through their 'employer-demand' strategy, which focuses on supporting employers to address labour shortages and build their capacity as inclusive workplaces. RWA is now active across all Canadian provinces and territories, and their employer network consists of 12 national private organisations across different industries, including Costco, PepsiCo and Deloitte.

They share expertise in inclusive practices to support workplaces in a number of different sectors and assess their labour needs to then match jobseekers with relevant skills and interests. Support is provided to both the employer and jobseeker through the hiring process, as well as during onboarding and beyond.

Since 2014, RWA has supported the employment of 2,943 job seekers. All jobs filled were regular vacancies; no employer created additional or separate jobs.[53] Recently, RWA secured government funding to expand the program to 2025.[54]

RWA has recently launched an online toolkit for workplaces to build their capacity to hire and support people with intellectual disability and ASD, called *The Inclusive Workplace*.[55] This gives the program an ability to be translated across professional and international contexts.

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49 María Teresa Peña and Lidia Esther Santana-Vega. "Transition to the Employment of People with Intellectual Disabilities in the Canary Islands: Supported Employment." MLS Educational Research 4, no. 1 (April 4, 2020): 90–105. https://doi.org/10.29314/mlser.v4i1.321

50 Peña "Transition to the Employment of People with Intellectual Disabilities in the Canary Islands", 93.

51 María Teresa Peña-Quintana and Lidia E. Santana-Vega. "The Transition to Employment in Wales and the Canary Islands for People with Intellectual Disabilities: Supported Employment" *Education Sciences* 12, no. 11, 2022: 1-16. https://doi.org/10.3390/educsci12110796

52 Inclusion Canada and Ready Willing and Able . "Ready Willing and Able (RWA) Consideration for Party Platforms." Accessed November 23, 2022. https://inclusioncanada.ca/wp-content/uploads/2021/08/Ready-Willing-and-Able-Platform-Brief-General.pdf.

53 Zero Project. "Canada's Ready Willing and Able Initiative of 2014-2017", accessed 23 November 2022. https://zeroproject.org/view/project/7b9a95b2-9f17-eb11-a813-0022489b3a6d

54 Ready Willing and Able, "Expansion of Ready, Willing and Able (RWA)", April 2022, accessed 23 November 2022. https://readywillingable.ca/about/expansion-2022/

55 Inclusion Canada, "The Inclusive Workplace", accessed 23 November 2022. https://www.theinclusiveworkplace.ca/en/home

Brazil

The *Insituto Jô Clemente* (IJC) is a non-profit organisation based in São Paulo supporting the rights of people with intellectual disability. In 2013, IJC launched the Professional Inclusion program to promote the inclusion of people with intellectual disability in open employment.[56]

Based on the principles of SE, the program offers a 'place then train' approach where individuals are supported through job coaches (IJC staff) to identify employers based on their skills and interests, receiving training through the workplace and hired with equal pay and benefits.

Program participants also attend 'job clubs', weekly meet-ups with job coaches and other program participants. These meet-ups provide the opportunity for peer-support and further skills-development, including self-advocacy training.

In 2019, more than 500 people had secured a job in open employment through the program, in sectors such as retail, administration, hospitality and food production. IJC reports a 90% retention rate after the first year, and offers extended support to individuals and workplaces.

The program has been replicated in three other cities in Brazil, with the goal to expand across all main Brazilian cities by 2026.[57]

UK

In recent years, a business-led highschool transition model, Project SEARCH, has been implemented across the UK to facilitate a more supportive and seamless transition for students with intellectual disability from highschool to securing competitive employment in the open workforce.

Project SEARCH originated in the US, where in 1996 it was piloted by Erin Riehle and Susie Rutowski at the Cincinnati Children's Hospital. The project responded to the American College of Healthcare Executives' policy statement that:

> "healthcare executives must take the lead in their organisations to increase employment opportunities for qualified persons with disabilities and to advocate on behalf of their employment to other organisations in their communities".[58]

Project SEARCH was launched to provide skills training through workplace internships. In the US, the internships took place in healthcare settings but soon expanded to several different commercial businesses.

Individuals who undertake Project SEARCH are provided with individualised plans for job searching based on skills and interests before beginning a one-year internship program, which includes 3 rotations at different workplaces where individuals are supported throughout. Today, the program has been established across 300 sites, mostly in the US.[59]

56 APAE São Paulo. "Instituto Jô Clemente", accessed 23 November 2022. https://ijc.org.br/pt-br/Paginas/default.aspx
57 Zero Project. "Professional Inclusion Brazil", accessed 23 November 2022. https://zeroproject.org/view/project/348119bc-8513-eb11-a813-000d3ab9b226
58 Cincinnati Children's Hospital . "Project SEARCH," 2021, accessed 23 November 2022. https://www.cincinnatichildrens.org/careers/diverse-workforce/project-search
59 Paul Wehman, Carol Schall, Jennifer McDonough, Alissa Molinelli, Erin Riehle, Whitney Ham, and Weston R. Thiss. 2013. "Project SEARCH for Youth with Autism Spectrum Disorders: Increasing Competitive Employment on Transition from High School." *Journal of Positive Behavior Interventions* 15(3): 144-155. https://doi.org/10.1177/1098300712459760

Employment rates for people with intellectual disability in the UK have remained stubbornly low, at around 7-12%, for the last two decades.[60] Young people with intellectual disability transitioning out of highschool face considerable challenges. One of the key issues in the UK is that services designed to support this transition are delivered by a range of independent agencies, often through partnerships between various organisations. There is a plethora of literature substantiating these challenges.[61]

Project SEARCH was launched in the UK in 2009 to explore how the model could better support this transition, particularly by encouraging participation and support from the business community to increase open employment opportunities for young people with intellectual disability.

Today, Project SEARCH has been implemented across more than 60 sites in the UK. The programs are set up as partnerships between local commercial businesses, the state vocational rehabilitation program, a local education agency, a local community rehabilitation program, disability service providers, and employment service organisations.

Evaluations on the model in both the US and more recently in the UK have demonstrated the high employment rates of individuals who take part. In the US, a five-year longitudinal study of sites in Upstate New York between 2009-2014 showed that 84% of graduating interns were able to get a paid job and maintain employment in a competitive integrated work environment.[62]

While the same longitudinal data is lacking in the UK, one evaluation of 2009-2013 found that across the UK's Project SEARCH sites, 315 interns (51.5%) secured a paid job.[63] Data collected by DFN Project SEARCH reports that between 2016 and 2020, around 62% of interns secure jobs after completing their internships, 80% of which being full time employment.[64]

Reflecting broader trends related to SE models, research shows that the key components of Project SEARCH are:

- the emphasis on collaboration between non-government support services, the business community, local authorities, state services and schools;
- the presumption of employability among the wider community;
- individualised assessment, job coaching and support; and
- ongoing support throughout internship placements.

60 Saeed Almalki, "A Qualitative Study of Supported Employment Practices in Project SEARCH." *International Journal of Developmental Disabilities* 67 (2) 2021: 140-150. https://doi.org/10.1080/20473869.2019.1627793

61 S. Beyer & Kaehne A, "The transition of young people with learning disabilities to employment: what works?" *Journal on Developmental Disabilities* 14, 2009: 81– 90; R. Baer et al."Students with intellectual disabilities: predictors of transition outcomes. *Career Development for Exceptional Individuals* 34, 2011: 132– 141.

62 J. Christensen, S. Hetherington, M. Daston and E. Riehle, "Longitudinal outcomes of Project SEARCH in upstate New York" *Journal of Vocational Rehabilitation* 42 2015: 247–255.

63 Axel Kaehne, "Project SEARCH UK: Evaluating Its Employment Outcomes" *Journal of Applied Research in Intellectual Disabilities* 29(6) 2015: 519-530.

64 DFN Project SEARCH, Impact Report 2021, accessed 20 November 2022, https://www.dfnprojectsearch.org/wp-content/uploads/2022/09/DFN-Project-SEARCH-Impact-Report-2021