



Tuesday, 19 December 2023

Dear DSS Engage team,

Re: Proposed Disability Employment Centre of Excellence

I am writing this letter in support of a joint submission on the Disability Centre of Excellence that was provided to the Department from Disability Representative Organisations (DROs).

Inclusion Australia is the national DRO representing the rights and interests of Australians with an intellectual disability and their families. Founded almost 70 years ago in 1954, our mission is to work to make sure people with an intellectual disability have the same opportunities as people without disability. We have organisational members in New South Wales, Queensland, South Australia, Tasmania, Victoria and Western Australia, and a Northern Territory branch.

We have a long history of systemic advocacy for open and self-employment for people with an intellectual disability. Over the years, we have consulted widely to gather the expertise and evidence from people with an intellectual disability and their families, as well as researchers, advocates and other experts. This has culminated in several recent major submissions, including a research report provided to the Disability Royal Commission:

- [What Works: Making Disability Employment Services \(DES\) work for people with an intellectual disability, 2021](#)
- [DES Reform Submission, 2022](#)
- [Joint Submission to the Australian Treasury's Employment White Paper, 2022](#)
- [Equal Pay Equal Rights: Final submission to the Disability Royal Commission, 2022.](#)

We are part of the group of DROs that provided a joint submission to this consultation, which was facilitated by the Disability Advocacy Network Australia (DANA) through its National Coordination Function. We strongly endorse the joint statement and the recommendations it makes about a Disability Centre for Excellence.

The joint submission highlights many of the barriers that have faced people with an intellectual disability in seeking and maintaining employment over the decades, especially in open and equitably remunerated work.

To address these barriers and build a genuinely inclusive workforce and economy, we believe it will be critical to:

1. Include people with an intellectual disability in key leadership roles within the Centre and across its core functions
2. Adopt evidence-based practice to support people with an intellectual disability in gaining and sustaining employment in the open workforce
3. Create an accessible communication plan to ensure people with an intellectual disability and families can stay informed about and involved in the planning and design of the Centre.

We expand on these points in detail below.

Including people with an intellectual disability in key leadership roles within the Centre and across its core functions

We firmly believe the establishment of a Disability Employment Centre for Excellence presents a crucial opportunity for people with an intellectual disability to lead and shape much needed social and economic change in relation to inclusive employment.

As the Options Paper pointed out, the unemployment rate for people with disability has not shifted in more than two decades. Australia has one of the lowest employment participation rates for people with disability in the OECD.¹ People with an intellectual disability are among the most marginalised when it comes to employment, with only 39% of people with an intellectual disability in the labour force (including people looking for work).²

People with an intellectual disability and their families have experiences of the social security system, employment services, and related supports that are unique. Because of the range of intersectional identities among people with disability as a group, many within this community experience the compounding impacts of these systems, and therefore have knowledge of them from a range of important perspectives.

Negative attitudes among employers and low expectations of people with an intellectual disability are some of the biggest barriers to inclusive employment.³ To address these and

¹ Wilson, E. and Campain, R. (2020) 'Fostering employment for people with an intellectual disability: the evidence to date', Hawthorn, Centre for Social Impact, Swinburne University of Technology; Inclusion Australia. 2023. Equal Pay Equal Rights--Final submission to the Disability Royal Commission. Retrieved from: <https://www.inclusionaustralia.org.au/submission/equal-pay-equal-rights/>

² Australian Bureau of Statistics, Disability, Ageing and Carers, Australia: Summary of Findings, 2019. Retrieved from: <https://www.abs.gov.au/statistics/health/disability/disability-ageing-andcarers-australia-summary-findings/latest-release> 2021.

³ Sandu, B. (2017). The Value of Lived Experience in Social Change: The need for leadership and organisational development in the social sector. Retrieved from: <https://thelivedexperience.org/wp-content/uploads/2017/07/The-Lived-Experience-Baljeet-Sandhu-VLE-full-report.pdf>. The Centre for International Economics. 2023. Specialist disability employment services post 2025—Practices that work: the missing keystone. Retrieved from: <https://www.thecie.com.au/>

change negative community attitudes, the active, visible presence and leadership of people with disability is essential.⁴

This means that people with an intellectual disability and families must be meaningfully, accessibly, and equitably involved in leading the design and implementation of the Centre, as well as its various activities. Their leadership will be important to ensure the Centre is fit-for-purpose and can meet the deepest community needs.

Our Policy Officers with an intellectual disability have long advocated for this. They say:

“People with an intellectual disability have their lived experience of employment and all the barriers, and they want to share ideas. This is respecting their human rights.

Hearing stories with people with intellectual disability and letting them speak up so they have a chance to have their voice heard is important. The Centre should be led by people with a disability and this has to include people with an intellectual disability, because we experience so many barriers to employment and we know what can work for us.”

“One of the big things is that this Centre needs to be disability-led: this could be through a reference group, or people with disability involved in the governance, like being on a Board of Directors. And people need to be paid and properly supported.

It’s important because we’ve seen so many different programs that are fantastic, but they are not led by people with disability and so they don’t have a big impact.

I want to see other people with disability get the chance to be trained by people who have done systemic advocacy work before so they can take over our work. This will give experienced self-advocates like me a chance to pass on their knowledge and expertise. I want to be able to train people so that when I can’t do this work anymore, there’s new experts to take over.”

Adopt evidence-based practice to support people with an intellectual disability in gaining and sustaining employment in the open workforce

The evidence base for what works in inclusive employment is well established, especially internationally. We believe an essential role for the Centre will be collecting what is already known and sharing that across the community, to people with disability, families, employment services, and employers. This should include active technical support for

⁴ Idle, J., Giuntoli, G., Fisher, KR, Robinson, S., Purcal, C., Newman, C., Reedy, K. (2022). Research Report – Changing community attitudes to improve inclusion of people with disability. Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. Retrieved from: <https://disability.royalcommission.gov.au/publications/research-report-changing-community-attitudes-improve-inclusion-people-disability>. Page 53-57.

services and employers to put the knowledge into practice, and peer-to-peer learning so better performing organisations can share their approaches.

A desktop review of various international case studies (including from the US, UK, Brazil, Canada, Sweden and Norway) demonstrates the following attributes as markers of success that lead to increased secure, inclusive employment of people with disability:

- The presumption of employability among parents, educators, employment services, the business sector, government and the wider community
- A high level of job customisation to suit the needs and interests of the individual 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), and that this begins as early as possible, with an emphasis on the role of schools to make those connections
- 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
- A strong role for employment brokers or vocational specialists to work with disability support services, health services (including mental health services), employment services, training organisations, schools, employers, families and jobseekers.⁵

Recent consultation with Inclusion Australia Northern Territory (IANT) has further substantiated what we know about what people with an intellectual disability want from their employment services. The IANT team emphasised the importance of:

- Listening to what people with an intellectual disability want and not making assumptions
- Providing accessible information about and support for making complaints and asking questions—and that this is widely available and accessible

⁵ Inclusion Australia. 2023. Equal Pay Equal Rights--Final submission to the Disability Royal Commission.

Retrieved from: <https://www.inclusionaustralia.org.au/submission/equal-pay-equal-rights>;

Kregel, J., Wehman, P., Taylor, J., Avellone, L., Riches, V., Rodrigues, R., & Taylor, D. (2020). 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.

See also: Wilson, E. and Campaign, R. (2020). Fostering employment for people with intellectual disability: the evidence to date. Centre for Social Impact, Swinburne University of Technology. Retrieved from:

<https://www.everyonecanwork.org.au/wp-content/uploads/2020/11/Fostering-employment-for-people-with-intellectual-disability-Accessible.pdf>

- Having the right supports at every stage of the process of getting and sustaining employment
- More education and training for government and employment service providers about work readiness and how to support people with an intellectual disability in employment.

“We do need a Centre. From my personal experience there wasn’t a lot of support going into helping me learn the skills and keep learning new skills in the workplace. They would come and check on me every now and then but not stay with me until I felt comfortable in the workplace. It caused a lot of stress on me. You need support when learning and building new skills, not just when you first start in a job.”

Create an accessible communication plan to ensure people with an intellectual disability and families can stay informed about and involved with the planning and design of the Centre

The joint statement from the DROs emphasised the importance of sharing open and accessible communication about the Centre and its development with the disability community.

This is especially important for people with an intellectual disability and their families because the employment system is complex and interconnected. People are often wary of changing jobs, hours, or even pay levels because of a perceived flow-on impact on access to income security like the Disability Support Pension.

We are operating in an environment of near constant reform in the disability policy and service system and people are experiencing change anxiety and fatigue. This has only been heightened with the recent release of the Disability Royal Commission and NDIS Review reports.

Clear, accessible information and inclusive co-design processes will be vital for building community trust in the Centre. The intensive consultation approach used by the NDIS Review panel, with regular updates, public sessions, and multiple opportunities for input, should be considered.

This would also create opportunities for people with an intellectual disability and families to share their views about the design and functions of the Centre and could ultimately foster a greater sense of ownership of the Centre at a grassroots level.

As one of our Policy Officers put it:

“There is a risk that people with disability will just see this as ‘another government agency’. There needs to be a strong communication plan to tell the public about what the Centre is actually about and what it’s going to do.

This is why people with an intellectual disability need to be involved at every stage of the Centre's development so that we can inform our communities about what is happening and get more input from as many people with disability as we can.

This will help people trust in what the Centre is aiming to do and have ownership of it."

We look forward to working collaboratively with the Department to make sure this happens.

Thank you for the opportunity to submit to this consultation, which is of great significance to our community. Please do not hesitate to contact me if you would like to discuss any of our ideas further.

Kind regards,

A handwritten signature in purple ink, appearing to read 'Catherine McAlpine', with a stylized flourish at the end.

Catherine McAlpine
Chief Executive Officer
Inclusion Australia