Inclusion Australia

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Dear Prof. Barney Glover AO,

Re: Jobs and Skills 2025-26 workplan

Inclusion Australia is the national peak organisation representing the rights and interests of Australians with an intellectual disability and their families. Founded more than 70 years ago in 1954, our mission is to work with people with an intellectual disability, their families and our members to make positive change.

Our strength is in our national representation and our connection to our community. We have a member organisation in every state and territory across Australia:

- ACT Down Syndrome and Intellectual Disability (ACT DSID)
- Council for Intellectual Disability (NSW)
- Developmental Disability WA (DDWA)
- Inclusion Northern Territory (Inclusion NT)
- Parent to Parent (P2P, Queensland)
- South Australian Council on Intellectual Disability (SACID)
- Speak Out Advocacy (Tasmania)
- Victorian Advocacy League for Individuals with Disability (VALID).

Our systemic advocacy draws on the deep, collective experience of our members, who have spent decades advancing the rights of people with intellectual disability and their families in their jurisdictions. Their expertise in peer support, individual and systemic advocacy, and community engagement—combined with their trusted, long-standing relationships with their communities—ensures that the voices of people with intellectual disability are heard and acted on.

Thank you for the opportunity to provide feedback on the Jobs and Skills Australia annual workplan and to work collaboratively to define its priorities and focus. Our feedback has been developed with our Policy Officers with an intellectual disability, who have significant experience in advocating for the employment rights of people with an intellectual disability.

Inclusion Australia and our member organisations have consulted widely over many years to gather the experience, expertise, and evidence from people with an intellectual disability and their families, as well as researchers, advocates, and other experts. This has culminated in the following (non-exhaustive) major reports and submissions:

- Fostering employment for people with an intellectual disability: the evidence to date, 2020
- What Works: Making Disability Employment Services (DES) work for people with an intellectual disability, 2021
- DES Reform Submission, 2022
- Equal Pay, Equal Rights—our submission to the Disability Royal Commission, 2023
- Consultation on a new specialist disability employment program, 2024.

You may also be aware of the recent announcement from the Government that Swinburne University of Technology will run Australia's first Disability Employment Centre of Excellence. As a member of the consortium, Inclusion Australia is the lead conduit for Disability Representative Organisations in Australia into the Centre of Excellence. We believe there will be many opportunities for Jobs and Skills Australia and the Centre to collaborate around shared priorities and interests.

Once again, we thank you for the opportunity to share our community's expertise with you to assist in developing a workplan that uplifts all Australians to participate to their full potential in the labour market. We warmly welcome further conversation about the evidence and feedback raised below.

Kind regards,

Catherine McAlpine

CEO, Inclusion Australia

A note on accessibility

We appreciate the detailed consultation paper that was provided to assist stakeholders with developing feedback. However, it was not provided in accessible formats, including Easy Read. While our team members with an intellectual disability were able to engage with the document with intensive support, their feedback highlighted the inaccessibility of the document and the ways this has limited opportunities for our community to take part in the consultation process, including people with other disabilities who have a range of access needs.

We kindly ask that any public information reporting on the outcomes of the consultation be made available in Easy Read. This will ensure that our community can access the information and engage with its findings. We thank you in advance for this.

We would be delighted to speak with you further about how to improve the inclusivity of future Jobs and Skills Australia consultation processes.

Our feedback on the 2025-26 workplan

We agree in principle with the five outcomes areas identified in the consultation paper.

In particular, we agree with the 'capacity and cohort studies' element which includes "undertaking scoping work on future cohort studies on the participation of Australian with disability in the workforce, focusing on improving data adequacy, currency and usage, and scoping the future First Nations studies to support the National Agreement on Closing the Gap".[1] We suggest Jobs and Skills Australia works with the National Disability Data Asset around its data initiatives as well, to ensure that work is joined up across the sector.

However, our Policy Officers with an intellectual disability identified that there was neither a major project nor ongoing and emerging work listed in the workplan associated with the unique barriers to employment faced by people with an intellectual disability. As we discuss below, this cohort is among the most marginalised from economic participation and decent work.

As such, we believe each of the workplan's outcome areas must prioritise people with an intellectual disability by including a specific focus on removing the barriers they face. We believe this will significantly strengthen the workplan to ensure it meets Jobs and Skills Australia's goal of "uplifting all Australians to participate to their full potential in the labour market" (p.1).

[1] https://www.jobsandskills.gov.au/sites/default/files/2025-01/jobs_and_skills_australia_2025-26_work_plan_development_-_public_consultation_paper.pdf

The following section provides recommendations for strengthening the workplan's outcome five areas in this regard, based on current evidence of the nature of those barries and proposed solutions for addressing them.

Recommendations

Outcome 1: Fostering inclusive participation

The stated focus of this outcome is "broadening employment opportunities through identifying and removing barriers for people and community" (p.7). To achieve this, we strongly believe people with an intellectual disability and their families must be prioritised, as this group faces a range of unique, entrenched barriers to gaining and sustaining work in the mainstream labour market.

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] [3] This contributes to the fact that the unemployment rate for people with disability in general has not shifted in more than two decades, and Australia continues to have one of the lowest employment participation rates for people with disability in the OECD.[4]

Australian Disability Enterprises (ADEs) are currently one of the few places where people with an intellectual disability can get employment. More than 20,000 people with disability, most of whom have an intellectual disability (72% of NDIS participants with an intellectual disability)[5], are employed in around 600 Australian Disability Enterprises (ADEs) across Australia.

Currently, a person employed in an ADE may be paid as little as $3.01 per hour for work under the Supported Wage System (SWS) within the Supported Employment Services (SES) Award.[6] The SES Award can also be applied to other, mainstream employment settings.

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[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] 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

[4] 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.

[5] National Disability Insurance Agency (NDIA) (2019). People with an intellectual disability in the NDIS. https://data.ndis.gov.au/reports-and-analyses/people-intellectual-disability-ndis.

[6] SWS wages are worked out based on an assessment of the employee's 'productive capacity'. We recently developed a submission to the Department of Social Services about the National Panel of Assessors program, in which SWS assessments are undertaken. It is available here: https://www.inclusionaustralia.org.au/wp-content/uploads/2024/09/IA-submission_RFT-National-Panel-of-Assessors_for-website.pdf

In addition, supports in employment that should be found in a wide range of settings are often only found in ADEs for people with an intellectual disability.

Few people transition from an ADE into inclusive employment settings, with research suggesting that fewer than 5% of people with disability transition to open employment from day services or ADE settings in Australia.[7]

Recommendation 1:

a) Include a focus across all evidence gathering on the experiences of and barriers to entering the open labour force experienced by people with an intellectual disability and their families, including the barriers to transitioning from ADEs to the open labour force.

b) Ensure the project to undertake a population-level survey of adult literacy and numeracy is co-designed with people with an intellectual disability and specifically assesses the barriers faced by this group to achieving educational parity, and how this impacts workforce participation.

Outcome 2: Understanding today's workforce

"Building the evidence base to inform and address current and emerging labour market and skills needs"[8] must include data-gathering activities assessing the extent to which employers are equipped to build knowledge and capacity to support the employment of people with an intellectual disability.

> *"Accessing open employment for people with an intellectual disability is very hard, because employers, they just don't even know [people with an intellectual disability] exist and they don't know how to make their employment processes accessible." – Inclusion Australia Policy Officer with an intellectual disability.*

The evidence for what works for people with an intellectual disability to secure and sustain employment on an equal basis with others is well established, especially internationally. 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:

[7] Australian Government, D.o.S.S. (2015). National Disability Employment Framework - Issues Paper. Retrieved from: https://engage.dss.gov.au/wp-content/uploads/2018/03/AFDO-Future-of-Supported-Employment-Paper-2018-03-FINAL.pdf;
Inclusion Australia and People with Disability Australia. 2022. Wage equity and more choices in employment for people with an intellectual disability. Research review. Retrieved from: https://www.inclusionaustralia.org.au/wp-content/uploads/2022/04/ADE-research-brief-April-2022.pdf

[8] Page 14 of the Jobs and Skills 2025-26 workplan.

- The presumption of employability among parents, educators, employment services, the business sector, government and the wider community.
- Access to independent, accessible information about employment options, communication support and supported to make decisions about work.
- 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). This planning should begin 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 job seekers.[9]

Recommendation 2:

One of the key roles of the new Disability Employment Centre of Excellence (the Centre) is to drive the collection and dissemination of best practices to improve employment outcomes for people with disability. The Jobs and Skills Australia workplan is well-positioned to support this by ensuring that the Centre's activities are shared effectively across the community, including people with disability, families, employment services, and employers. The workplan should also support the Centre's work by promoting its initiatives and helping to direct employers, policymakers, and other stakeholders to its resources and expertise. This should include:

[9] 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

a) Actively promoting the Centre's research and best-practice guidance to employers, employment services, and policymakers, ensuring that evidence-based approaches are widely understood and implemented.

b) Facilitating connections between the Centre and key stakeholders through forums, networks, and industry engagement, helping to amplify its impact and drive systemic change in disability employment.

Outcome 3: Shaping Australia's future workforce

To strengthen the planning and outcomes related to mapping the "opportunities and challenges for our nation's future workforce needs" (p. 7), this process must include evidence gathering related to practices that uphold the rights of people with an intellectual disability, which are essential to increasing overall workforce participation.

This effort has implications for national priorities, including Australia's Disability Strategy as recognised in the workplan, as well as the work of the Disability Employment Centre of Excellence (the Centre), the ongoing federal and state/territory-level work to implement the recommendations of the Disability Royal Commission related to employment, and the reforms to the Specialist Disability Employment Program (SDEP). The workplan must contain meaningful connections that document active work to support these national and jurisdictional priorities.

In addition, to effectively develop a forward outlook of workforce skills and needs, the barriers experienced by people with an intellectual disability (many of which are unique to this cohort) and evidenced-based skills for overcoming those barriers and supporting the employment of people with an intellectual disability, need to be integrated.

In late 2022 and early 2023, Inclusion Australia undertook a substantial policy project with people with an intellectual disability and families, to explore barriers and opportunities to inclusive employment.

As part of this project, we conducted extensive stakeholder consultations, including a project advisory group, interviews, surveys, and individual consultations. Several key themes emerged from the experiences people with an intellectual disability shared about their experiences in employment, including in ADEs, and their ideas about what needs to change. The most common themes were:

- Wages are too low under the SES Award: people with an intellectual disability need to be paid a proper wage on an equal basis with others.
- There are not enough jobs for people with an intellectual disability in open employment.
- People with an intellectual disability need ongoing, individualised support to find and sustain employment.

- Employer attitudes and low expectations are a significant barrier to finding and sustaining a job.
- The system is too complex: people with an intellectual disability and families who use Disability Employment Services (DES), NDIS, Centrelink and other government services are overburdened with the significant administrative workload and inaccessibility of these systems.
- People with an intellectual disability want—and have a right—to feel safe at work, and to be included and belong in a meaningful way.[10]

For this outcome area, we recommend that the workplan consider these themes and put strategies into place to overcome barriers, including promoting fair wages.

Recommendation 3:

Embed a dedicated focus on the workforce skills and needs of people with an intellectual disability and of employers to support their workforce participation. This includes:

a) Identifying and leveraging existing evidence from national initiatives, which may include sector-specific project work, such as that undertaken by Inclusion Australia and our member organisations, to inform workforce development and planning.

b) Forecasting needs of employers to support the workforce participation of people with an intellectual disability, including by identifying sectors with high growth potential for meaningful employment opportunities.

c) Aligning data collection and other efforts identified in the workplan with other national priorities, such as the National Disability Data Asset (NDDA), Disability Employment Centre of Excellence, and supporting whole-of-government workforce initiatives that drive the inclusive employment of people with an intellectual disability, such as ongoing reforms to the Specialist Disability Employment Program (SDEP).

Outcome 4: Optimising pathways and system architecture

We recognise the importance of enabling responsive pathways to support labour market transitions. For people with an intellectual disability, the transition from school to work is key, yet there is a significant lack of resourced supports to assist people with this transition. Inclusion Australia has commissioned a number of evidence reviews assessing:

- The effects of mainstream versus special schooling on employment outcomes.

[10] Inclusion Australia. 2023. Stakeholder engagement analysis. Retrieved from: https://www.inclusionaustralia.org.au/wp-content/uploads/2023/05/Inclusion-Australia_Equal-Pay-Equal-Rights_Stakeholder-engagement-analysis_March-2023.pdf

- Work experience as a predictor of employment.
- Year 12 completion as a predictor of employment.
- Effective transition from school to work and post-secondary education.
- The role of interagency collaboration as a factor in facilitating employment.

Leveraging the existing evidence for improving understandings of outcomes for school leavers with an intellectual disability is crucial for driving a more connected skills system and supporting reforms to the national skills architecture.

Another way to strengthen the proposed activities in this outcome area is to promote the role of government in optimising pathways by opening employment to people with disability and providing and modelling the right support.

For example, the Disability Royal Commission recommended establishing specific and disaggregated targets for disability employment in the public sector, and for new public service hires in government agencies and departments (Recommendations 7.18, 7.19 and 7.22). The NDIA, DSS and the NDIS Commission are well placed to model and grow employment for people with disability. We have long advocated that these agencies must set specific and ambitious targets for the employment of people with disability. This will demonstrate leadership and a model of good practice for the rest of government and should be implemented as a matter of priority.

Evidence is clear that negative attitudes among employers and low expectations of people with disability—especially those with complex support needs—are some of the biggest barriers to inclusive employment.[3] To address these and change negative community attitudes, the active, visible presence and leadership of people with disability is essential.[4]

In addition, we are aware of many other examples of procurement policies—for example, for First Nations people—that could be tested to understand whether there are approaches that might be replicated for people with disability. This could be incorporated as part of the workplan's activities.

Recommendation 4

Identify existing evidence on school-to-work transitions for people with an intellectual disability to inform a more connected and inclusive national skills system. This includes:

a) Integrating existing evidence on school leaver outcomes, predictors of employment, and the impact of interagency collaboration into national workforce planning.

b) Enhancing government leadership by promoting public sector employment for people with disability, aligning with the Disability Royal Commission's recommendations for specific targets across government agencies.

c) Gathering data on inclusive procurement models by assessing the effectiveness of employment-driven procurement policies, such as those used for First Nations employment, to identify scalable approaches for people with an intellectual disability. All data collection and analysis should be informed by and consistent with the work being undertaken by the National Disability Data Asset (NDDA).

Outcome 5: Activating an informed dialogue

We strongly agree with the need to convene stakeholders across the skills system to provide evidence for good practice and advice on Australia's current and future workforce skills and needs. People with an intellectual disability and their families need to be included in this process.

Our community has experiences of employment services, open employment and ADE environments, the social security system, NDIS, and related supports that are unique. Because of the range of intersectional identities among people with an intellectual 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.

We know that when included early, equitably and meaningfully in systemic advocacy, people with disability make highly valuable contributions to shaping policy outcomes that are fit-for-purpose, match community need and avoid unintended consequences. As such, the inclusion of people with an intellectual disability and their families and other supports (including systemic advocacy organisations with specific, historical experience working with people with an intellectual disability), in an 'informed dialogue' is crucial.

Recommendation 5

As part of the activities related to collaboration with key stakeholders, we strongly recommend including people with an intellectual disability and their families by working with systemic advocacy organisations with a history of working alongside people with an intellectual disability, to ensure that convened stakeholder dialogues include representation of this cohort and are informed by evidence and community-led solutions. This should include ensuring that all information and resources related to the Jobs and Skills Australia 2025-26 workplan are also made available in Easy Read as a first step to increasing accessibility and including people with an intellectual disability in consultation processes.