



Women  
With  
Disabilities  
Australia  
(WWDA)

## **WOMEN WITH DISABILITIES AUSTRALIA (WWDA)**

**Response to the Disability Employment Centre of Excellence  
Options Paper**

**Department of Social Services**

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## ABOUT WOMEN WITH DISABILITIES AUSTRALIA (WWDA)

[Women With Disabilities Australia \(WWDA\)](#) Inc is the national Disabled People's Organisation (**DPO**) and National Women's Alliance (**NWA**) for women, girls, feminine identifying, and non-binary people with disability in Australia. As a DPO and an NWA, WWDA is governed, run, and staffed by and for women, girls, feminine identifying and non-binary people with disability.

**WWDA uses the term 'women and girls with disability', on the understanding that this term is inclusive and supportive of, women and girls with disability along with feminine identifying and non-binary people with disability in Australia.**

WWDA represents more than 2 million women and girls with disability in Australia, has affiliate organisations and networks of women with disability in most States and Territories, and is recognised nationally and internationally for our leadership in advancing the rights and freedoms of all women and girls with disability. Our organisation operates as a transnational human rights organisation - meaning that our work, and the impact of our work, extends much further than Australia. WWDA's work is grounded in a human-rights based framework which links gender and disability issues to a full range of civil, political, economic, social, and cultural rights. All WWDA's work is based on co-design with and participation of our members. WWDA projects are all designed, governed, and implemented by women and girls with disability.

Disabled People's Organisations (**DPOs**), also referred to as Organisations of Persons with Disabilities (**OPDs**) are recognised around the world, and in international human rights law, as self-determining organisations led by, controlled by, and constituted of, people with disability. DPOs/OPDs are organisations of people with disability, as opposed to organisations which may represent people with disability. The United Nations Committee on the Rights of Persons with Disabilities has clarified that States should give priority to the views of DPOs/OPDs when addressing issues related to people with disability. The Committee has further clarified that States should prioritise resources to organisations of people with disability that focus primarily on advocacy for disability rights and, adopt an enabling policy framework favourable to their establishment and sustained operation.<sup>1</sup>

# WWDA'S SUBMISSION

## Introduction

1. Women With Disabilities Australia (**WWDA**) welcomes the opportunity to respond to the Department of Social Services' Disability Employment Centre of Excellence Options Paper (**Options Paper**). WWDA commends the Australian Government on its commitment to improving employment outcomes for people with disabilities and developing the capacity of employers and employment service providers.
2. WWDA remains deeply concerned about the unchanging rates of employment, and poor employment outcomes, for people with disabilities in Australia, and in particular, women with disabilities. Notwithstanding that discrimination in the course of employment is prohibited under Federal, state and territory laws, people with disabilities continue to experience unemployment, under-employment, and discrimination within the workforce. In a 2018 national survey of people with disabilities run by a partnership of peak disability organisations, a majority of respondents (91%) reported that they did not have the same employment opportunities as their non-disabled peers.<sup>2</sup> Women with disabilities in particular are also at greater risk of harassment, discrimination, violence and abuse within the workplace than their male or non-disabled counterparts. For example, the Fourth National Survey on Sexual Harassment in Australian Workplaces found that nine out of ten (89%) women with disabilities had been sexually harassed, compared to seven out of ten (68%) men with disabilities.<sup>3</sup>
3. Clearly, there is an urgent need to address the employment rates, outcomes and experiences of people with disabilities in Australia – and in particular, women. We set out our recommendations to the Australian Government at the conclusion of this submission, and also refer to our previous submissions on the National Disability Employment Strategy.

## A human rights approach to work and employment

4. The right to paid work is a fundamental human right, recognised in the seven core international human rights treaties to which Australia is a signatory. As a party to these treaties, Australia has chosen to be bound by the treaty requirements and has an obligation to implement the treaty provisions through its laws and policies.
5. Article 27 of the Convention on the Rights of Persons with Disabilities (**CRPD**) sets out the rights to work and employment for people with disabilities. This includes the right to employment on an equal basis with others, and the right to the opportunity to gain a

living by work that is freely chosen or accepted in an open, inclusive and accessible labour market and working environment. Under Article 27, States Parties, including Australia, are required to protect and promote the right to work, including by:<sup>4</sup>

- a. Prohibiting discrimination on the basis of disability with regard to all matters related to all forms of employment and ensuring that reasonable accommodation is provided in the workplace;
- b. Protecting the rights of people with disabilities to 'just and favourable' conditions of work, including equal opportunity and equal pay for work of equal value, workplace health and safety, protection from harassment, and redress for work-related grievances;
- c. Ensuring that people with disabilities can exercise their labour and trade union rights on an equal basis with others;
- d. Providing people with disabilities access to general technical and vocational guidance programmes, placement services and vocational and continuing training;
- e. Promoting opportunities for work experience within the open labour market, as well as opportunities for employment and career advancement, and self-employment, entrepreneurship and business development;
- f. Employing people with disabilities in the public sector and promoting employment of people with disabilities in the private sector; and
- g. Promoting vocational and professional rehabilitation, job retention and return-to-work programmes for persons with disabilities.

6. In 2019, the United Nations Committee on the CRPD expressed its concern about Australia's implementation of the CRPD in relation to the right to work. In particular, the Committee expressed concern about:<sup>5</sup>

- a. *The narrow and incomplete scope of the review of the National Employment Framework for People with Disability and about the lack of clear measures to reform the Disability Employment Services;*
- b. *The ongoing segregation of persons with disabilities employed through Australian Disability Enterprises and the fact that such persons receive a sub-*

*minimum wage;*

- c. *The low labour force participation of persons with disabilities, particularly women with disabilities, Aboriginal and Torres Strait Islander persons with disabilities, persons with disabilities from culturally and linguistically diverse backgrounds and refugee and asylum-seeking persons with disabilities.*

7. The Committee recommended that the Australian Government:<sup>6</sup>

- a. *Take measures to reform the Disability Employment Services and develop a national disability employment strategy that incorporates the recommendations from the 'Willing to work' inquiry and contains targeted gender-sensitive measures;*
- b. *Undertake a comprehensive review of Australian Disability Enterprises to ensure that they adhere to article 27 of the Convention and provide services to enable persons with disabilities to transition from sheltered employment into open, inclusive and accessible employment, ensuring equal remuneration for work of equal value;*
- c. *Implement measures to address systemic and structural barriers experienced by persons with disabilities, particularly by women with disabilities, Aboriginal and Torres Strait Islander persons with disabilities, persons with disabilities from culturally and linguistically diverse backgrounds and refugee and asylum-seeking persons with disabilities.*

8. The CRPD also requires that the Australian Government implement targeted measures to address the systemic and structural barriers that women with disabilities experience. Article 6 of the CRPD requires States Parties, including Australia, to:

*...take all appropriate measures to ensure the full development, advancement and empowerment of women, for the purpose of guaranteeing them the exercise and enjoyment of the human rights and fundamental freedoms set out in the present Convention.<sup>7</sup>*

9. This includes by ensuring that national policies, frameworks, and strategies include focused, gender-specific measures to ensure that women and girls with disabilities experience full and effective enjoyment of their human rights. Article 6 is a cross-cutting article, meaning that the rights of women with disabilities must be specifically identified and addressed in all measures of implementation and monitoring of the CRPD, including

employment.

10. However, WWDA is concerned that the Australian Government has not enacted the recommendations of the Committee in full. Various stakeholders, including Disabled People's Organisations and Disability Representative Organisations, have recommended that the Australian Government act urgently to improve the situation of people with disabilities in relation to employment.

### **The need for a Disability Employment Centre of Excellence**

11. A Disability Employment Centre of Excellence is a critical step in addressing the persistent barriers and discrimination people with disabilities experience in relation to employment in Australia. As the Options Paper identifies, the unemployment rate for individuals with disabilities has remained largely unchanged over the past two decades, standing at a rate three times that of people without disabilities. Currently, 46.6% of people with disabilities of working age are not participating in the labour force; a concerning rate that demands intervention.<sup>8</sup>
12. People with disabilities, and in particular women and gender diverse people with disabilities, also experience workplace discrimination and harassment at a disproportionate rate.<sup>9</sup> Workplace discrimination not only hampers one's ability to secure and maintain employment, but also contributes to a pervasive sense of exclusion and inequality and has significant impacts on wellbeing. It is a clear violation of the fundamental rights to equality and non-discrimination.
13. Low workforce participation rates and poor employment outcomes for people with disabilities are largely underpinned by ableism - the system of harmful social norms and beliefs that devalue people with disabilities. WWDA believes that changing the attitudes of employers and other stakeholders requires the development of a suite of programs, policies, initiatives and support services that comprehensively challenge harmful attitudes. WWDA has argued, including in our submission on the National Disability Strategy 2020-2030 and our submission on the National Disability Employment Strategy, for an agency or entity established under special purpose legislation, with the aim of improving and promoting equality for people with disability in the workforce.
14. Similar to the Workplace Gender Equality Agency and *Workplace Gender Equality Act 2012*, the agency and its enacting legislation could:
  - a. Promote and improve disability equality (including equal remuneration between disabled persons and non-disabled persons) in employment and in

the workforce.

- b. Support employers to remove barriers to the full and equal participation of people with disability in the workforce.
- c. Promote, amongst employers, the elimination of discrimination based on disability in relation to employment matters.
- d. Foster workplace consultation between employers and employees on issues concerning disability equality in employment and in the workforce.
- e. Improve the productivity and competitiveness of Australian business through the advancement of disability equality in employment and in the workforce.

15. WWDA therefore welcomes the establishment of a Disability Employment Centre of Excellence (or, as WWDA has proposed elsewhere, a Workplace Disability Equality Agency) that fulfils these functions. The need for such a Centre is underscored by the need to address and change poor employer attitudes; enhance the capacity of employment service providers to provide high-quality support to people with disabilities; and address and rectify longstanding issues of segregation and harm within the workforce for people with disabilities. WWDA, alongside other Disability Representative Organisations, has long called for the abolition of segregation of people with disabilities in employment, in recognition that segregation is discrimination.

16. The Final Report of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability has detailed alarming instances of violence, abuse, neglect, and exploitation of and against people with disabilities, particularly in segregated settings. The establishment of a Disability Employment Centre of Excellence can assist the Australian Government to implement the recommendations of the Royal Commission, in addressing the harm and discrimination that people with disabilities experience in the context of employment, and promoting open and inclusive employment opportunities.

### **Core functions of the Centre**

17. The Disability Employment Centre of Excellence must establish core functions that effectively address the persistent barriers people with disabilities experience in the context of employment. WWDA considers that the Centre should:

- a. Be established and operate independently of Government.



- b. Actively engage in and inform policy development and advocacy, shaping policies that eliminate discrimination and protect, promote and advance the rights of people with disabilities in relation to employment.
- c. Conduct disability-led research and analysis.
- d. Produce capacity building initiatives for employers and employment service providers, based on and informed by existing evidence-based programs. This approach aims to equip employment service providers with the necessary tools to comprehensively address the diverse needs of individuals with disabilities. Embracing disability-led co-design principles, the Centre should seek to establish new benchmarks for the development of employment services. There is potential to model a program akin to the Career and Technical Education (CTE) initiative, providing training opportunities for individuals with disabilities to support organisations.
- e. Oversee quality assurance and establish performance standards to ensure continuous improvement.
- f. Perform educative functions, through public education campaigns that target ableism and educate employers and the broader public on the rights, capabilities and contributions of people with disabilities.
- g. Adopt functions based on the model of the Workplace Gender Equality Agency, including to monitor, evaluate and report on employment outcomes and services.

18. Critically, a successful Disability Employment Centre of Excellence must be led, governed and informed by people with disabilities. Traditional systems and approaches have, in many instances, fallen short of adequately addressing the unique needs of people with disabilities with a diverse range of impairments. Involving individuals with disabilities in the design, development, production and oversight of policies, programs, and services ensures that the initiatives proposed are informed by firsthand experiences and nuanced understanding. This approach not only acknowledges the diversity of the disability community but also empowers individuals with disabilities to actively shape the systems that directly impact their lives. Disability-led co-design fosters a sense of ownership, trust, and authenticity, increasing the likelihood of implementing effective and sustainable solutions that genuinely meet the needs of the disability community. It represents a departure from the paternalistic models, embracing a collaborative and inclusive approach that promotes transformative change in the realm of disability

employment. It is also a necessary component of the Australian Government's obligations under international human rights law.

### **Who the Centre can assist**

19. The Disability Employment Centre of Excellence should provide assistance to stakeholders within the disability employment context. This includes those who:
  - a. Are impacted by poor disability employment outcomes (i.e. people with disabilities);
  - b. Drive disability employment outcomes (i.e. employers, employment service providers, and supported employment providers); and
  - c. Play a role in impacting employment outcomes and advocating for the rights of people with disabilities (i.e. advocates, disability representative organisations and disabled people's organisations).
  
20. When assisting individuals with disabilities, the Centre must ensure that assistance is relevant and accessible to individuals with a broad range of impairments. This includes individuals with physical disabilities, sensory disabilities, intellectual disabilities, mental health conditions, neurodevelopmental disorders, and chronic health conditions. The Centre must also be sensitive and responsive to the unique needs of diverse communities and cohorts, including those who experience multiple points of marginalisation. For example, the Centre's strategies, programs and initiatives must not only be genuinely accessible – but also gender-responsive, culturally responsive, and culturally safe. The Centre must also ensure that it undertakes regular, meaningful and properly resourced consultation with people with disabilities and their representative organisations.
  
21. It is critical that the Centre also focus efforts on building the capabilities of employers and employment service providers, so that the onus does not fall upon people with disabilities to enforce their rights within employment contexts. The Centre must work with employers, employment service providers and agencies, and governments to drive systemic change and improve employment outcomes for people with disabilities, as determined by people with disabilities.

### **How the Centre can work with stakeholders**

22. It is critical that people who represent the diversity of the disability community be involved in the leadership, oversight and operation of the Centre. Leadership that reflects the diversity within the disability community is vital for understanding and

addressing the unique priorities and needs of various cohorts, including under-served groups. This includes individuals with less visible disabilities, those with episodic disabilities, those with intellectual disabilities, and those who experience multiple discrimination at the intersections of disability and other attributes, such as gender, sexual orientation, age, socioeconomic status, or linguistic or cultural diversity.

23. The Disability Employment Centre of Excellence should adopt effective governance structures led by and with people with disabilities, using a similar model to that of the Oversight Council of the National Autism Strategy. Establishing an Oversight Council, comprising diverse stakeholders including individuals with disabilities, Disability Representative Organisations and Disabled People's Organisations, and experts in disability employment, ensures that decision-making processes are informed by a broad range of perspectives.
24. The principles of co-design and co-production are also integral to the development of any of the Centre's programs or initiatives. Collaborating with stakeholders, including individuals with disabilities across a broad range of impairments, ensures that programs and initiatives, including training programs, are not only evidence-based but are relevant and applicable to the lives of people with disabilities, and are informed by the people whose lives they affect. Critically, there is a tendency for Government to facilitate and enable co-design and public participation only at the preliminary stages of a policy, program or project. It is rare that all stages of a policy or program life-cycle involve genuine engagement and consultation. This creates an environment wherein critical gaps and flaws in implementation, monitoring and evaluation are inevitable, but cannot be addressed effectively. Further, bureaucratic barriers prevent affected groups, from having their feedback heard and actioned at later stages of a policy or program. Genuine engagement with stakeholders (including people with disabilities and their representative organisations) must involve shared design, production, monitoring and evaluation. It is also consistent with a human rights approach.
25. As the United Nations Committee on the Rights of Persons with Disabilities (**Committee**) has acknowledged, 'the active and informed participation of everyone in decisions that affect their lives and rights is consistent with the human rights-based approach in public decision-making processes, and ensures good governance and social accountability'.<sup>10</sup> The Committee has further stated that, '...full and effective participation requires that States parties facilitate participation and consult with persons with disabilities representing the wide diversity in impairments. The right to participate is a civil and political right and an obligation of immediate application, not subject to any form of budgetary restriction...'.<sup>11</sup> Disabled People's Organisations and Disability Representative Organisations can play a critical role in elevating the voices of people with disability who may not otherwise have the opportunity to influence policy or program design or

reform. However, these organisations must be adequately funded and resourced to participate and engage with the communities they represent, in order to effectively ascertain and represent their priorities.

26. Establishing strong partnerships with employers is also a key to the Centre's impact. The Centre should be tasked with the role of building employer capacity to provide open employment opportunities where the diverse skills and contributions of people with disabilities are valued, and rights are realised. Employers that are disability-led and have established ethical, accessible, and genuinely inclusive workplaces can play a leadership role in this regard. A particular focus on the attitudes of or barriers for employers, is instrumental in understanding and addressing discrimination and segregation within the employment landscape. A research-driven approach would allow the Centre to tailor its programs to address discriminatory attitudes of employers, and build employer capacity to identify solutions to perceived challenges in employing people with disabilities. Programs, training and capacity-building initiatives for employers should be founded on a human rights approach to employment and accessibility.

### How the Centre can increase the capacity of employers and providers

27. The Disability Employment Centre of Excellence should serve to build the capacity of employers and employment service providers to realise the rights of people with disabilities in the course of employment, through a strategic and comprehensive approach. This includes by:
- a. Implementing standardised training and professional development pathways for service providers, leveraging existing frameworks and training such as initiatives offered by the Centre for Disability Employment Research in Practice (**CDERP**). The development of standardised training will ensure consistency and quality across employment services.
  - b. Highlighting best practice approaches to create a collective knowledge base, by creating a platform for employment service providers to share successes, challenges, and innovative approaches.
  - c. Integrating and promoting the use of cutting-edge and innovative technologies and tools.
  - d. Implementing mechanisms for accountability, including performance standards, regular internal and external evaluations and public reporting.

- e. Developing data and research initiatives to inform evidence-based practices. The Centre can lead or support research projects focused on improving employment outcomes for individuals with disabilities, collecting and analysing data to identify trends and areas for improvement.
  - f. Promoting community engagement, awareness campaigns, and public education including from a human rights approach.
  - g. Facilitating collaboration and/or partnerships to promote shared responsibility and collaborative problem-solving.
  - h. Establishing quality assurance and accreditation mechanisms with continuous improvement strategies.
28. Research and data sharing initiatives should be prioritised to collect and disseminate information to identify key priorities and address unmet need. Across Australia, there is a dearth of disaggregated data, research and studies that provide insight into the employment of women with disabilities, including in relation to their experiences of discrimination, violence, abuse and exploitation in employment settings and services. This gap in information not only makes it difficult to understand the experiences of these cohorts, but also places significant limitations on the ability of the Australian Government to report on its international obligations, including those under the CRPD.
29. The Centre should also implement robust monitoring and evaluation mechanisms to assess the effectiveness of its initiatives. Regularly seeking and implementing feedback from stakeholders, including employers and individuals with disabilities, will ensure that the Centre remains adaptive and responsive to evolving needs. This ongoing assessment is crucial for continuous improvement and the refinement of programs and services, as well as the progressive realisation of the right of people with disabilities to employment on an equal basis with others.

### **Proposed models for the Centre**

30. WWDA considers that the Centre should function similarly to the Workplace Gender Equality Agency, with the Statutory Agency model serving to elevate the importance of disability employment within the public and private sectors, supported by effective regulatory mechanisms. In considering the other models presented, WWDA advocates for a Centre that encompasses a combination of essential functions, coupled with an additional regulatory function to provide a structured mechanism for oversight and ensure consistency, compliance and best practice among employment service providers. This comprehensive approach aligns with a commitment to having a genuine and

tangible impact on the employment rates, outcomes and experiences of people with disabilities.

31. By establishing a formal research function, as per the Research Centre Model, the Centre could also serve as a focal point for expertise in disability employment research and initiatives. It is imperative that any research agenda is inclusive of, and led by people with disabilities. Partnership with universities, research organisations, governments, businesses, and advocacy bodies could then ensure a comprehensive and collaborative approach. This could reflect a model similar to that of the Autism CRC's Australasian Autism Research Council that includes Autistic people, their supporters, Government and other experts. The creation of practical tools and training programs based on this disability-led research would promote 'best practice' in disability employment led by lived experience.
32. While WWDA acknowledges the merits of the Clearinghouse Model, which offers speed and cost-effectiveness in disseminating information, we are concerned that this model would not adequately support the necessary capacity-building for employers and employment service providers. Integrating some functions of this model into the Centre of Excellence, however, could serve to enhance information dissemination and accessibility. Similarly, functions of the Evidence-Informed Training Hub and Statutory Agency models may prove beneficial. For example, the Evidence-Informed Training Hub presents an opportunity to establish a centre of expertise for disability employment training. Leveraging existing services and networks, it could play a vital role in disseminating knowledge, changing community attitudes, and engaging with employers and service providers. The option to offer both accredited and non-accredited courses provides flexibility in addressing diverse training needs.
33. WWDA considers that the Centre could operate and function in similar ways to existing agencies and Centres, based on learnings in relation to the Centre for Research Excellence in Disability and Health, the National Centre of Excellence in Intellectual Disability Health, and the Workplace Gender Equality Agency. However, WWDA proposes that the Centre have more comprehensive and wholistic functions than many of these existing bodies. WWDA strongly recommends ruling out models that have a singular type of activity and focus, emphasising the importance of adopting comprehensive and multifaceted approaches. Singular-focused models may lack the necessary breadth to address the diverse needs of individuals with disabilities in the employment sector.
34. Regardless of the chosen model for the Disability Employment Centre of Excellence, WWDA emphasises that:

- a. Governance and activities must be led and informed by people with disabilities. The meaningful participation of people with disabilities in decision-making processes, leadership roles, the overall direction of the Centre, and monitoring and evaluation, is essential to ensure that its programs and initiatives are truly responsive to the diverse needs of the disability community.
- b. The Centre must be flexible and dynamic to adapt to emerging priorities, and supported by transparent and robust governance mechanisms.
- c. There is significant benefit in promoting collaborative partnerships to enrich research and broaden impact.
- d. The Centre's initiatives should be informed by evidence, grounded in data, and should contribute to tangible outcomes.
- e. The Centre should promote transparency and accountability through public reporting mechanisms including in relation to the Centre's activities, outcomes, and adherence to established key performance indicators.
- f. When considering regulatory functions, the Australian Government should carefully assess the remit and effectiveness of existing bodies, to reduce overlap, and aim to strike a balance between regulatory oversight and collaborative support.

35. The Disability Employment Centre of Excellence must also be genuinely independent, established and operating as a government-funded but independent entity to ensure impartiality in decision-making and strategic focus. This is critical because issues of segregated employment, exploitation, discrimination, and under-employment are persistent and long-standing, and reform will require long-term and consistent efforts. The realisation of the right to employment as contained in the CRPD must not be subject to fluctuations in resourcing or changes in the political landscape.

## Recommendations

WWDA makes the following recommendations regarding the Disability Employment Centre of Excellence:

1. Establish and properly resource an independent Disability Employment Centre of Excellence that:
  - a. Is established by legislation as a statutory agency; balancing flexibility and specificity in legislative frameworks to ensure adaptability to evolving needs.
  - b. Holds long-term funding commitments to guarantee the stability and continuity of the Centre's initiatives over multiple election cycles, acknowledging that sustainable change requires a long term viewpoint.
  - c. Is led, governed and informed by people with disabilities, with a diverse range of impairments, to ensure that governance, programs, strategies, policy and advocacy are informed by the lived experiences of individuals with disabilities. This includes by ensuring that individuals with disabilities actively and genuinely participate in decision-making processes, leadership roles, and shaping the overall direction of the Centre.
  - d. Facilitates the genuine participation of people with disabilities with a broad range of impairments in determining and shaping the overall direction of the Centre.
  - e. Uses existing evidence-based programs and disability-led co-design principles.
  - f. Delivers initiatives, programs and strategies to build the capacity of employers and employment service providers, including standardised training and professional development pathways, and incorporates a regulatory function to provide structured oversight and maintain consistency in service delivery.
2. Task the independent Disability Employment Centre of Excellence with:
  - a. Addressing the unchanging unemployment rates, barriers to employment and poor employment outcomes for people with disabilities, through engaging in evidence-based research to understand the barriers and develop



targeted interventions.

- b. Addressing the unique experiences of people with disabilities who experience multiple discrimination, using an intersectional lens. For example, by ensuring that a disability and gender equality lens is applied to all employment frameworks, initiatives, programs and policies to address underlying barriers to employment for women with disabilities including violence, abuse, exploitation and sexual harassment.
  - c. Promoting the realisation of the rights of people with disabilities in the context of employment consistent with the Convention on the Rights of Persons with Disabilities.
  - d. Combatting discrimination and ableism through initiatives (including education and campaigns) that challenge discriminatory attitudes and behaviours.
  - e. Promoting awareness and understanding of the rights of people with disabilities in the context of employment among employers, employment provider services, people with disabilities and members of the public.
  - f. Promoting collaboration with and between people with disabilities and their representative organisations, as well as other key stakeholders, to ensure that community engagement is genuinely inclusive and representative.
  - g. Holding stakeholders, including employers and employment service providers, to account through mechanisms for transparent reporting.
3. Support the independent Disability Employment Centre of Excellence to develop a research program that:
- a. Collects employment outcomes data and information on access to employment and employment services, disaggregated by gender and disability and other demographics to ensure that areas of unmet need are identified.
  - b. Includes research and collaboration activities with existing disability employment service providers to identify and rectify systemic issues, including deficiencies in Disability Employment Services (**DES**) and inadequate NDIS funding.

- c. Establishes the Centre as a hub for disability-led research and analysis, addressing gaps in understanding and promoting evidence-informed practices.
- d. Builds collaboration between academic institutions, research organisations, and the disability community to inform policies, programs, strategies and initiatives.
- e. Actively supports policy development to influence systemic changes that foster inclusivity, eliminate discrimination, and promote the rights of people with disabilities in the context of employment.
- f. Actively engages with employers and employment service providers, to identify barriers and promote inclusive employment practices.

WWDA makes the following recommendations to the Australian Government generally:

1. Review employment and discrimination legislation and policy to ensure that Australia is meeting its international human rights obligations set out in all 7 United Nations treaties.
2. Transition towards ending Australian Disability Enterprises, sheltered workshops and all segregated settings, and promote opportunities for people with disabilities in open employment settings.

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<sup>1</sup> Committee on the Rights of Persons with Disabilities, *General Comment No. 7 on the Participation of Persons with Disabilities, Including Children with Disabilities, through Their Representative Organizations, in the Implementing and Monitoring of the Convention*, UN Doc CRPD/C/GC/7 (9 November 2018).

<sup>2</sup> Australian NGO CRPD Shadow Report Coordinating Committee (2019) [Australian Civil Society Shadow Report to the United Nations Committee on the Rights of Persons with Disabilities](#) in response to the List of issues prior to the submission of the combined second and third periodic reports of Australia, [CRPD/C/AUS/QPR/2-3]. Compiled by the Australian Civil Society CRPD Shadow Report Working Group, July 2019.

<sup>3</sup> Australian Human Rights Commission (2018) [Everyone's business: Fourth national survey on sexual harassment in Australian workplaces](#), Australian Human Rights Commission, Sydney.

<sup>4</sup> United Nations Convention on the Rights of Persons with Disabilities, December 13, 2006, Article 27.

<sup>5</sup> Committee on the Rights of Persons with Disabilities, *Concluding observations on the second and third combined reports of Australia*, 22nd sess, UN CRPD/C/AUS/CO/2-3 (15 October 2019).

<sup>6</sup> Committee on the Rights of Persons with Disabilities, *Concluding observations on the second and third combined reports of Australia*, 22nd sess, UN CRPD/C/AUS/CO/2-3 (15 October 2019).

<sup>7</sup> United Nations Convention on the Rights of Persons with Disabilities, December 13, 2006, Article 6.

<sup>8</sup> Australian Bureau of Statistics, Employment characteristics of people with disability, 24 October 2019, Disability, Ageing and Carers, Australia: Summary of Findings, 2018 | Australian Bureau of Statistics (abs.gov.au).

<sup>9</sup> Australian Human Rights Commission, *Everyone's Business: Fourth National Survey on Sexual Harassment in Australian Workplaces* (2018) 27–8.

<sup>10</sup> Committee on the Rights of Persons with Disabilities, *General Comment No. 7 on the Participation of Persons with Disabilities, Including Children with Disabilities, through Their Representative Organizations, in the Implementing and Monitoring of the Convention*, UN Doc CRPD/C/GC/7 (9 November 2018).

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<sup>11</sup> Committee on the Rights of Persons with Disabilities, *General Comment No. 7 on the Participation of Persons with Disabilities, Including Children with Disabilities, through Their Representative Organizations, in the Implementing and Monitoring of the Convention*, UN Doc CRPD/C/GC/7 (9 November 2018).