



Women  
With  
Disabilities  
Australia  
(WWDA)

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

**Response to the 'A stronger, more diverse and independent  
community sector' Issues paper**

**Department of Social Services**

**November 2023**

## PUBLISHING INFORMATION

Women With Disabilities Australia (WWDA) (2023). Response to the 'A stronger, more diverse and independent community sector' Issues paper: November 2023. Written by [REDACTED], Policy Manager, Women With Disabilities Australia (WWDA): Hobart, Tasmania.

### Acknowledgments

WWDA acknowledges the traditional owners of the land on which this publication was produced. We acknowledge First Nations people's deep spiritual connection to this land. We extend our respects to community members and Elders past, present and emerging.

This document was written by [REDACTED], WWDA Policy Manager.

Formatting, editing and design by [REDACTED] (WWDA) and [REDACTED] (WWDA).

Women With Disabilities Australia (WWDA) receives part of its funding from the Australian Government, Department of Social Services (DSS).

### Contact

Women With Disabilities Australia (WWDA)  
Contact: [REDACTED], Executive Director  
PO Box 407, Lenah Valley, 7008 Tasmania, Australia  
Phone: [REDACTED]  
Email: [REDACTED]  
Email: [officeadmin@wwda.org.au](mailto:officeadmin@wwda.org.au)  
Web: [www.wwda.org.au](http://www.wwda.org.au)  
Facebook: [www.facebook.com/WWDA.Australia](https://www.facebook.com/WWDA.Australia)  
Twitter: [www.twitter.com/WWDA\\_AU](https://www.twitter.com/WWDA_AU)

Winner, National Human Rights Award 2001  
Winner, National Violence Prevention Award 1999  
Winner, Tasmanian Women's Safety Award 2008  
Certificate of Merit, Australian Crime & Violence Prevention Awards 2008  
Nominee, UNESCO Prize for Digital Empowerment of Persons with Disabilities 2021  
Nominee, National Disability Awards 2017  
Nominee, French Republic's Human Rights Prize 2003  
Nominee, UN Millennium Peace Prize for Women 2000  
Finalist, International Zero23 Award, Information and Communication Technologies (ICT)

**Women With Disabilities Australia (WWDA) has Special Consultative Status with the Economic and Social Council of the United Nations.**

### Disclaimer

The views and opinions expressed in this publication are those of Women With Disabilities Australia (WWDA) and not necessarily those of our funding bodies. All possible care has been taken in the preparation of the information contained in this document. WWDA disclaims any liability for the accuracy and sufficiency of the information and under no circumstances shall be liable in negligence or otherwise in or arising out of the preparation or supply of any of the information aforesaid. This work is copyright. Apart from any use as permitted under the Copyright Act 1968, no part may be reproduced without written permission from Women With Disabilities Australia (WWDA). © 2023 Women With Disabilities Australia (WWDA).

ABN: 23 627 650 121

ARBN: 621 534 307

## 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' 'A stronger, more diverse and independent community sector' Issues paper (**Issues Paper**).
2. WWDA commends the Australian Government on its election commitment to building a stronger, more diverse and independent community sector. In particular, we support the Department of Social Services' goals of ensuring that:
  - a. grants reflect the cost of delivering quality services, with options for longer-term contracts so that community sector organisations can plan for the future, workers have certainty, and services can become part of the communities that they serve;
  - b. grant funding flows to a more diverse group of community sector organisations, with a renewed priority of partnering with trusted community organisations with strong local links; and
  - c. community sector organisations that support communities are treated as respected partners of government, with meaningful consultation processes in place to ensure the sector has the voice and respect it deserves.
3. As the Issues Paper identifies, community sector organisations are experiencing growing operational challenges and record levels of demand for support and services. Many community sector organisations are under-funded and under-resourced, which prevents them from operating sustainably and meeting the demands of the communities they are designed to serve and represent.
4. As the Issues Paper acknowledges, these challenges include increased costs for delivering services, greater demand, and changes to the sector, including in relation to the workforce and the workplace relations landscape. The rigidity of current funding structures and processes, and the administrative burdens associated with reporting and short-term funding, inhibits innovation and prevents organisations from evolving and adapting to meet changing community priorities.
5. The short-term length of funding agreements for community sector organisations often prevents organisations from maintaining a consistent workforce, resulting in lost expertise and reduced operational efficiency. For individual workers, shorter-term funding creates job insecurity, which has a disproportionate impact on women in feminised sectors – including the community sector. Critically, women with disability are also over-represented in the community services sector,<sup>2</sup> and this gender imbalance is greater amongst disabled workers than non-disabled workers.<sup>3</sup> As a Disabled People's Organisation that is led and staffed by

women and gender diverse people with disability, WWDA is acutely aware of its role in providing security and longevity of employment for its staff.

6. Further, as the Australian Council of Social Service's 2022 Australian Community Sector Survey found,<sup>4</sup> many community sector organisations do not receive adequate mainstream funding to cover the full cost of service delivery or staffing. The unfortunate consequence is that many leaders and managers of community sector organisations work excessive hours to manage a workload that they cannot afford to pay staff to perform. The distribution of this unpaid labour again falls predominantly on women and, in WWDA's case, women with disability.

### **Giving the sector the voice and respect it deserves through a meaningful working partnership**

7. As the Issues Paper acknowledges, there are currently limited formal mechanisms that give the community sector a stronger voice to co-design models for funding and program delivery to achieve the best outcomes. It is widely understood that genuine co-design – that involves the sharing of power - is the most effective method of ensuring that a strategy or policy meets the needs of the cohort it seeks to serve. It is critical that the Australian Government commit to the genuine co-design of funding models and programs to best support community sector organisations and the individuals they serve and represent.
8. 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, including community sector organisations, from having their feedback heard and actioned at later stages of a policy or program. Genuine engagement with community sector organisations (and the individuals they serve) must involve shared design, production, monitoring and evaluation.
9. Engaging with community sector organisations that are led by, and represent, the members of the community that they serve is an effective way of ensuring that minoritised cohorts have an opportunity to contribute to program design. 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. On-the-ground engagement with members and community is a critical step in ensuring that representative organisations can act as a conduit between community and government. However, consultation and engagement can be resource-intensive, particularly when working with minoritised cohorts. For example, in order to ensure that community engagement is accessible to people with disability with a range of impairments, Disabled People's Organisations and Disability Representative Organisations

must take additional steps to arrange appropriate supports, and provide events, materials and information in various formats and languages (including Auslan, Plain English and Easy Read) and various locations and settings. Engaging with people with disability in closed settings or remote locations, or people who do not or are unable to participate in online events, requires additional resourcing, including travel. For people who have had negative and/or traumatising experiences with governments and authorities, organisations must also invest in building trust. However, genuine engagement with these cohorts is crucial. As the United Nations Committee on the Rights of Persons with Disabilities (**Committee**) has stated, ‘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>5</sup>

10. Further, as the 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>6</sup> The right of all people to participate in public life is also enshrined in a number of international human rights instruments, to which the Australian Government is a party. For example, participation in public life as a principle and human right is recognised in article 21 of the Universal Declaration of Human Rights, article 25 of the International Covenant on Civil and Political Rights, article 5 of the International Convention on the Elimination of All Forms of Racial Discrimination, article 7 of the Convention on the Elimination of All Forms of Discrimination against Women, articles 12 and 23 of the Convention on the Rights of the Child, and the Convention on the Rights of Persons with Disabilities as both a general obligation and a cross-cutting issue, including in articles 4 and 33. The Australian Government must recognise and give effect to the right to participate in public life, including through adequate allocation of funding and resources for community sector organisations that are led by and represent minoritised cohorts, to facilitate participation.
11. Genuine engagement is also time-intensive. Many community sector organisations are required to respond to competing demands across government departments, with strict time constraints. This often results in missed opportunities to attend consultation or the inability to adequately prepare (and therefore effectively participate). As an organisation that advocates for the human rights of women, girls, feminine-identifying and non-binary people with disability, WWDA has a stake in all policy areas across both national and international landscapes. For example, women with disabilities have unique priorities and face unique challenges in relation to housing, employment, education, health, technology, climate change and the justice system – despite these policy areas sitting outside the neat categories of ‘women’ and ‘disability’. WWDA is often required to decline invitations to attend government consultation, or to seek extensions for the provision of policy submissions, due to competing demands from different government departments. This is particularly the case when requests are made by government departments that do not directly fund WWDA’s operations but are nonetheless relevant to the lives of WWDA’s members. Disabled People’s Organisations in particular, which are led by people with disability, often face additional barriers to meeting

inflexible time constraints, due to fluctuations in staff health. Strict time constraints also impact WWDA's ability to genuinely engage with members of the community about issues of policy and law reform because meeting a range of accessibility needs takes time. While WWDA has developed innovative methods for conducting community consultation within strict timeframes, greater flexibility would increase opportunities for community input.

12. Further, a lack of coordination and collaboration between government departments undermines efficiency. For example, earlier this year WWDA responded to multiple consultations with different government departments on the use of artificial intelligence and automation, and its impact on the disability community. Deadlines for submission, and consultation events, were scheduled within the same month. For community sector organisations that receive funding from multiple sources, including multiple government departments, greater coordination would improve efficiency, reduce administrative burden, and result in more cost-effective outcomes.
13. To improve coordination and the sharing of information, WWDA also supports the implementation of funded coordination functions, including the Disability Representative Organisation National Coordination Function. It is critical that these roles be funded and resourced appropriately, to play a proactive role in coordinating the distribution of information between and across government and community sector organisations, and collaboration between organisations on matters of shared interest. However, it is also important to note that individual organisations will continue to have their own policy and advocacy priorities for the cohorts that they serve and represent, that may fall outside the scope of coordinated and joint activities. For example, while WWDA regularly enjoys collaboration with gender-sector and disability-sector colleagues through the National Women's Alliances and Disability Representative Organisations Programs, WWDA is the only national advocacy organisation specifically for women, girls, feminine identifying, and non-binary people with disability in Australia.

### **Providing grants that reflect the real cost of delivering quality services**

14. As WWDA and many other community sector organisations have raised with various government departments, grants and funding agreements must reflect the real cost of the activity required. In many cases, funding is not adequate to provide market rates for staffing costs, costs associated with operations, and the costs of engagement and consultation with community. This creates a situation in which organisations are chronically under-resourced and cannot employ the personnel they require. A consequence of inadequate funding is a reliance on the unpaid labour of staff and leaders within an organisation, outside of the hours they are remunerated for. As outlined above, due to the overrepresentation of women within the community sector, the bulk of this unpaid labour is performed by women.
15. There are also additional costs for organisations that are led by, employ, or work with cohorts of people with accessibility requirements. For example, specialised equipment or additional support to enable staff with disability to travel, is unlikely to be considered in the allocation of

funding for travel expenses. However, as the Committee on the Rights of Persons with Disabilities has made clear, 'States parties should also allocate financial resources for covering expenditures related to the consultation processes for representatives of organisations of persons with disabilities, including transport and other expenses necessarily incurred to attend meetings and technical briefings'.<sup>7</sup> Funding processes and practices must take into account the unique needs of specific organisations and the nature of their workforce. Additional funding for accessibility requirements, incorporated into funding agreements, is required to increase equity and diversity within the community sector.

16. As the Committee has also recommended, States parties including Australia, should adopt criteria to allocate funding by:<sup>8</sup>

- a. Providing funds directly to organisations of persons with disabilities, avoiding third-party intermediation;*
- b. Prioritising resources to organisations of persons with disabilities that focus primarily on advocacy for disability rights;*
- c. Allocating specific funds for organisations of women with disabilities and of children with disabilities to enable their full and effective participation in the process of drafting, developing and implementing laws and policies and in the monitoring framework;*
- d. Distributing funds on an equal basis among different organisations of persons with disabilities, including sustainable core institutional funding, instead of being limited to project-based funding;*
- e. Ensuring the autonomy of organisations of persons with disabilities in deciding their advocacy agenda, despite the funding received;*
- f. Distinguishing between funding for the running of organisations of persons with disabilities and the projects carried out by such organisations;*
- g. Making funding available to all organisations of persons with disabilities, including for self-advocate organisations and/or those that have not gained a legal status due to laws that deny the legal capacity of their members and hinder the registration of their organisations; and*
- h. Adopting and implementing application processes for funding in accessible formats.*

17. There are also significant time and financial costs associated with the administrative burden of funding arrangements and reporting requirements. Onerous and inflexible reporting requirements can result in time and staff hours being directed away from the activities required under those arrangements. Further, differences in reporting processes across government departments, and a lack of coordination between government departments, can increase administrative burdens for organisations that are funded by multiple grants.



18. WWDA has long advocated for the use of just one touch-point within the Federal Government, to oversee funding arrangements and contractual obligations with a whole-of-organisation approach. This would include, for instance, requiring WWDA to report its activity once per reporting period, and carry out compliance obligations (such as the Commonwealth Child Safe Framework Statement of Compliance) as an organisation as and when required, rather than for each funded activity. Greater coordination would assist to streamline reporting requirements, and ideally improve consistency and clarity across reporting processes.

### Providing longer grant agreement terms

19. The current duration of grant agreements does not provide community sector organisations with security for future-planning, or ensuring consistency within the workforce.

20. Longer funding cycles will maximise the impact and output of community sector organisations, by enabling longer-term thinking and strategy, as well as operational consistency. For example, the use of short-term funding cycles requires community sector organisations to engage employees on fixed term contracts, which do not provide staff with sufficient job security. Coupled with issues of high demand, many community sector organisations experience a high turnover of staff. This means that significant time and money is used on staff recruitment and training to replace staff at the start of new funding cycles, undermining operational efficiency and ultimately requiring organisations to use greater amounts of funding on staffing costs.

21. Additionally, recent legislative reform has seen the introduction of new limitations on the use of fixed term contracts.<sup>9</sup> While the reforms are intended to increase job security by ensuring that employers do not misuse fixed term contracts where an employee's position is ongoing or reasonably expected to be ongoing, many organisations will find it difficult to comply due to the duration of their funding agreements. Further, it is unclear when the exceptions to the limitations will apply to particular funded community sector organisations.<sup>10</sup> The legislation stipulates that the limitations on fixed term contracts will not apply to any contract of employment that relates to a position that is partly or wholly funded by government (or funding otherwise prescribed by the regulations), where the funding is payable for a period of more than 2 years, and where there are no reasonable prospects that the funding will be renewed after the end of that period.<sup>11</sup>

22. The term 'no reasonable prospects' clearly establishes a high threshold for the operation of this exception; however, the legislation does not provide criteria for how 'no reasonable prospects' should be assessed. Community sector organisations will not have the confidence to rely on these exceptions without guidance on how they should be interpreted, and it is unlikely that an organisation that does not have insight into the likelihood of funding renewal, will be able to assert that there are 'no reasonable prospects'. Further, the requirement that funding be payable for a period of more than 2 years for the exception to apply may prove problematic for organisations engaged in projects-based work, where funding may be allocated for a project that is successful, and results in renewed funding. Re-engaging the person initially hired for the project may constitute a contravention, if the renewed engagement exceeds two

years' duration. However, not re-engaging that person could contravene the Act's prohibitions on actions to avoid the limitations on fixed term contracts.<sup>12</sup> It is unclear how organisations should manage this scenario. While the Act does provide that the recurrent use of fixed term contracts will be permissible if allowed by the applicable modern award,<sup>13</sup> the Social, Community, Home Care and Disability Services Industry Award (which covers many community sector organisations) does not have such a provision.

23. In addition to longer-term funding agreements, community sector organisations require flexibility to meet emerging community priorities. For example, a fundamental component of WWDA's projects and programs is co-design. This means that projects and programs may evolve over time, consistent with community input. It is critical that funding arrangements allow for flexibility and innovation, and that activity work plans remain 'living' documents, capable of change. This requires that government representatives working with community sector organisations are genuinely and proactively engaged in the work and priorities of funded organisations, and demonstrate trust in their expertise. This can be aided by having a single government touch-point for each organisation, who serves as a government partner to promote and support the work of each organisation.

## Ensuring grant funding flows to a greater diversity of Community Service Organisations

24. It is critical that the Australian Government prioritise grant funding for community organisations that represent and serve the needs and priorities of marginalised communities, over and above for-profit service providers. WWDA recently attended an information session for the Disability Representative Organisations grants opportunity. The Disability Representative Organisations program provides the opportunity for people with disability, and their representative organisations, to inform Government and participate in decision-making, legislation, policy development and implementation of programs and policies that impact people with disability. Notwithstanding that the grant eligibility criteria expressly states that National Disability Insurance Scheme (NDIS) providers and Disability Employment Service (DES) providers are ineligible for the program, WWDA was surprised to find that many NDIS and DES providers had attended the information session and had indicated an interest in obtaining a waiver of the eligibility criteria. Critically, and as outlined above, the Committee on the Rights of Persons with Disabilities has also recommended that States parties prioritise funding for organisations of people with disability (such as Disabled People's Organisations).<sup>14</sup>
25. At present, many organisations are unable to build operational capacity under existing funding contracts because the funding is inadequate. Community sector organisations must be allocated base funding for organisational capacity, including operations management and human resources functions. This includes new and emerging community sector organisations, but is not limited to such organisations. Many existing community sector organisations also require funding and resourcing to support growth, and to manage high demands within the sector.

26. Ensuring a greater diversity of community sector organisations also requires, as outlined above, additional funding allocation for organisations that have unique operational needs, and flexibility to reflect diverse organisational practices and cultures.

## Recommendations

1. Implement the recommendations of the Committee on the Rights of Persons with Disabilities in its *General comment No. 7 on the participation of persons with disabilities, including children with disabilities, through their representative organisations, in the implementation and monitoring of the Convention*.<sup>15</sup> This includes recommendations in relation to funding and capacity building for Disabled People's Organisations and Disability Representative Organisations; establishing and regulating accessible consultation mechanisms; adopting and implementing laws and policies to ensure that persons with disabilities can exercise their right to be consulted and participate in public decision-making; and establishing mechanisms to enforce public authorities' compliance with the right of persons with disabilities to participate.
2. Increase and extend grant funding for the community sector organisations, to ensure they are adequately resourced to fulfil contractual obligations and provide quality services. This includes by:
  - a. Lengthening grant agreements, to enable organisations to engage in longer-term planning, employment and strategy or services;
  - b. Establishing and building into grant agreements, funding arrangements to meet the needs and costs of organisations that work with or are led by cohorts of people that require additional support or specific forms of communication and engagement. This includes, for example, interpreter and translation services, accessibility requirements, and travel to remote locations.
3. Increase collaboration and coordination within government to ensure that government departments can:
  - a. Allow time and resourcing for meaningful engagement with community sector organisations and the individuals they serve or represent;
  - b. Provide a coordinated, single touch-point for community sector organisations that conduct activities across and are funded by different government departments; and
  - c. Reduce the administrative burden for community sector organisations in responding to tight time constraints, competing demands, and overlaps in compliance and reporting requirements imposed by different government departments.
4. Undertake consultation with community sector organisations about grant management and reporting processes, with the aim of ensuring:
  - a. That there is clarity, consistency and flexibility, including in relation to activity requirements, emerging priorities, and organisations' operational needs; and

- b. That performance and reporting requirements effectively capture and reflect differences in organisational practice (including between organisations and over time), as guided by the priorities of the communities they serve and represent.
5. Promote greater collaboration in policy-making with marginalised cohorts and their representative organisations throughout the entire life-cycle. This includes:
- a. Ensuring longer timeframes for consultation;
  - b. Involving marginalised cohorts and the community sector organisations that represent them, in design, production, implementation, monitoring and evaluation; and
  - c. Ensuring adequate funding and resourcing to enable community sector organisations to participate, and support the communities they serve and represent to participate effectively.
6. Support, fund, and resource collaboration between community sector organisations to facilitate information-sharing, balance workload, and ensure that policy issues are considered and addressed with an intersectional lens.

## ENDNOTES

---

<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 Institute of Health and Welfare (2022) *People with disability in Australia: Employment*. Web-report: <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/employment/employment-rate-and-type>.

<sup>3</sup> Australian Institute of Health and Welfare (2022) *People with disability in Australia: Employment*. Web-report: <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/employment/employment-rate-and-type>.

<sup>4</sup> Cortis, N. and Blaxland, M. (2023) *At the precipice: Australia's community sector through the cost-of-living crisis, findings from the Australian Community Sector Survey*. Sydney: ACOSS.

<sup>5</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>6</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>7</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>8</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>9</sup> *Fair Work Legislation Amendment (Secure Jobs, Better Pay) Act 2022* (Cth) s333E.

<sup>10</sup> *Fair Work Legislation Amendment (Secure Jobs, Better Pay) Act 2022* (Cth) s333F.

<sup>11</sup> *Fair Work Legislation Amendment (Secure Jobs, Better Pay) Act 2022* (Cth) s333F(f).

<sup>12</sup> *Fair Work Legislation Amendment (Secure Jobs, Better Pay) Act 2022* (Cth) s333H.

<sup>13</sup> *Fair Work Legislation Amendment (Secure Jobs, Better Pay) Act 2022* (Cth) s141A.

<sup>14</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>15</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).