



Next Steps for Supported Employment

APM Submission

21 June 2025



Acknowledgement of Traditional Owners and Custodians

APM acknowledges the traditional custodians of the lands on which we live and work. We pay our respects to elders past and present of all Aboriginal and Torres Strait Islander nations. Globally, APM recognises the significance of indigenous communities and the important role they play within our own workforce and the world, underpinning our efforts to build a culture that embraces diversity, equity and inclusion.

Photography

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Executive Summary

As Australia's largest contracted provider of Disability Employment Services and a national provider of NDIS-funded employment supports, APM welcomes the opportunity to contribute to the consultation on the future of supported employment. We strongly support the Australian Government's commitment to increasing choice, control, and opportunity for people with disability—particularly those with high support needs—and agree that this moment presents an opportunity for system-wide transformation.

Our submission is grounded in a life-course, ecosystem view of employment. We believe that inclusive employment is not a single intervention or program, it is the product of coordinated systems, early aspiration-building, tailored supports, and responsive service delivery across a participant's journey.

To deliver on the vision outlined by the Royal Commission, we must build a disability employment system that meets people where they are and walks alongside them over time.

Our submission:

- Maps out the employment journey through the lens of the participant, identifying where early exposure, system integration, and customised support are essential.
- Outlines actions to ensure supported employment reforms are inclusive, safe, and genuinely enable progression—without displacing those who rely on current options.
- Supports the development of a National Inclusive Employment Roadmap that embeds evidence, flexibility, and the diverse voices of people with disability.

Our recommendations focus on enabling genuine choice, building provider and employer capability, and ensuring no one is left behind as the sector evolves. We urge the government to prioritise integrated funding and policy settings, customised and portable supports, and sustained investment in inclusive workforce development.

People with high support needs want and deserve the opportunity to contribute, belong, and thrive through work. Our role as a sector, and as a nation, is to ensure the system around them is ready.

About APM

APM Group is a team of 16,500 people in 11 countries with a global purpose - to enable better lives.

APM started in 1994 as a vocational rehabilitation provider based in Perth, Western Australia, looking to provide better access to vocational rehabilitation services for injured workers so they could recover their health and return to work.

Today we're an international human services provider with more than 1,700 locations across Australia, the United Kingdom, Canada, the United States of America, New Zealand, Germany, Switzerland, Spain, Sweden, Singapore, and South Korea.

For people with disability, injury or illness, the unemployed, and those facing hardship or harm, our teams make a positive and lasting social impact every day.

We take immense pride in empowering people to realise their ambitions and aspirations through sustainable employment, independence, better health, and wellbeing, and increased social and economic participation.

Each year globally, APM supports more than 2 million people of all ages to live a better quality of life.

In Australia, our more than 6000 strong team deliver key services across the social services and care economy, including employment, training, aged and disability care, community and assessment, and health and wellbeing, from 618 locations nationally.

Simply put, APM helps people to find employment, recover from injury and illness, improve their health, and enjoy social and economic participation in their community, no matter where they are in life's journey

APM's Ecosystem View: Understanding the Participant Pathway to Work

A Life-Course Approach to Employment

Achieving meaningful, inclusive employment for people with disability - particularly those with high support needs - requires a life-course approach. Employment is not a single decision or event; it is a process shaped by early aspirations, social norms, inclusive and vocationally supportive education pathways, and coordinated support across systems. For too many people with disability, this journey is fragmented, delayed, or obstructed from the outset.

At APM, we believe early exposure to work, structured pathways through school and into further education or employment, and timely engagement of supports are critical to sustainable employment outcomes. This means investing not only in job outcomes but in the entire trajectory that leads to them.

We support reforms that begin employment conversations early, well before school leaving age, and are embedded across mainstream and specialist systems. NDIS funded employment supports for young people (previously known as School Leaver Employment Supports [SLES]) are foundational but the current approach has meant that many young people are falling through the cracks. Greater integration with schools and vocational education is needed to ensure no young person is left behind. Early support should nurture aspiration, build self-determination, and expose young people with disability to diverse forms of work in real-world settings.

In addition, the disability employment ecosystem must support individuals through transitions, between education and work, between programs, or through health-related life events. These transitions are often the points of greatest vulnerability, particularly for people with high support needs, and require consistent relationships, flexible service models, and a shared planning framework across systems.

A better life-course approach to employment support looks like:

- **Embedding career exploration and work experience in school settings** for young people with disability, supported by strong partnerships between educators, families, and disability employment providers.
- **Strengthening transition pathways** by funding a national Transition to Work for all young people with disability (replacing the current fragmented approach where specialised youth employment supports are dependent on access to the NDIS).
- **Developing national guidance** on early employment conversations and planning across life stages, tailored to different disability profiles and support needs.
- **Ensuring continuity of support** during key life transitions, including flexible, portable, and integrated support arrangements across education, NDIS, and employment systems.

A life-course approach acknowledges that employment outcomes are not simply about job matching, they are the result of long-term investments in capability, confidence, opportunity, and aspiration. To transform supported employment, we must begin by transforming the pathway into it.

A Coordinated Interface Between Systems

Participants (should) experience the employment system as a continuum of supports - not a series of disconnected programs or funding options. Yet current policy and program architecture too often creates silos between key domains: the NDIS, Disability Employment Services (DES - soon to be Inclusive Employment Australia [IEA]), income support, education, health, and rehabilitation systems. These silos make it harder for people with high support needs to navigate pathways to work, leading to delays, service gaps, and duplicated or misaligned supports.

It is critical that policy makers take an ecosystem view to any reform, recognising the continuum of participant support needs and how the elements of the system interact (or fail to) if government is going to realise the vision for supported employment.

APM's experience across the DES program, NDIS employment supports, and community-based services highlights the need for more seamless integration across systems. For example, participants receiving NDIS-funded employment supports often struggle to coordinate these with DES supports, particularly when there is limited data sharing, role clarity, or shared accountability between providers and agencies.

We also see challenges where policy settings do not align - for example, where income support rules create disincentives to work, or where NDIS planners and DES providers hold different assumptions about "work readiness" or support needs. For participants, these inconsistencies create stress, confusion, and avoidable barriers to participation. For a practical example, while the new IEA program eligibility means people with disability who have historically been locked out of the DES program (those with less than 8 hours work capacity) will be able to access the program, it is not funded in a way that will enable frequent and intensive capacity building for work that those with more complex needs require, meaning it will be critical for planners, NDIS employment providers and IEA providers to be able to understand capacity building needs, plan and integrate supports appropriately, including through co-servicing.

To address these challenges the system requires:

- **Formalising collaboration mechanisms** between NDIS, employment, education, and health systems at both the policy and service delivery levels.
- **Developing shared planning tools and outcome frameworks** that follow participants across services and life stages so that employment goals are co-owned, not duplicated or forgotten.
- **Improving data integration and information sharing** to allow early identification of risk points, better service coordination, and clearer accountability.
- **Building a common capability framework** across planners, LACs, employment consultants, and educators to support consistent expectations and shared language around work.

True choice and control relies on systems that not only offer options, but work together to support participants to understand, pursue, and realise those options over time.

Customised, Flexible, and Ongoing Support

For people with high support needs, standardised employment pathways often fail to provide the intensity, flexibility, or personalisation required for success. At APM, we see firsthand the difference that tailored, participant-led approaches can make, particularly those grounded in *customised employment*, job creation, and sustained in-employment support.

Customised employment approaches, which match a person's unique strengths and interests to job tasks, environments, and supports, are especially powerful for participants with complex needs. However, access to these models is uneven and often constrained by rigid funding rules, workforce capability gaps, or program boundaries (e.g., NDIS vs DES).

Similarly, many participants benefit from long-term on-the-job support, ongoing job coaching, or episodic re-engagement following health fluctuations. But current program and funding designs tend to prioritise narrowly more defined placement metrics, rather than recognising the reality of fluctuating capacity, episodic disability, or the time required to build sustainable working lives. While DES and IEA have program settings that should enable support needs to be met, the reality is that funding and outcomes definitions often preclude providers from delivering models that work. For example – the current DES program prevents providers from supporting people with disability with high support needs in work crews¹ in open employment as it is considered “enclave or congregate employment”. However, we know from experience that these options of support – where groups of employees with higher support needs work together with support in an open employment setting, are not only in themselves inclusive, but often lead to other open employment opportunities and more inclusive hiring practices within the host organisation.

To enable greater inclusion in open employment, APM recommends:

- **Expanding access to customised employment approaches** across DES, NDIS and the new IEA model—including through provider capability building and flexible funding envelopes.
- **Better funding ongoing support needs**, including ongoing job coaching and career development.
- **Strengthening provider collaboration with employers**, including through embedded support, work crew and inclusive enclave models.
- **Investing in workforce development** across the disability employment ecosystem to deliver person-centred, strengths-based support tailored to complex support needs.

Inclusion is not about expecting participants to fit into existing employment systems—it's about evolving those systems to support the full diversity of human experience. Customised, ongoing, and flexible supports are central to that evolution.

Ongoing, Supported Transitions (Not Exit Points)

The transition from supported employment to open employment is too often framed as a linear progression, from ‘less’ to ‘more’ inclusion, or from ‘segregated’ to ‘mainstream’ work. In practice, for many people with high support needs, employment journeys are dynamic and non-linear. Participants may require supported work as a starting point, as a parallel option, or as a base from which to explore other opportunities. Others may move in and out of open employment due to health or life circumstances.

What's needed is a system that supports transitions *as part of the journey*, not as a one-way exit. This includes scaffolded transitions out of supported settings, supported re-entry after job loss or health setbacks, and the use of intermediary or ‘bridge models’, such as social firms and work integrated social enterprises, that blend elements of supported and open employment.

¹ <http://www.worksupport.com/documents/sechapter11.PDF>

As one of Australia's largest providers of disability employment services, APM has seen how structured transitions with embedded coaching, employer engagement, and continuity of relationships lead to higher rates of sustained open employment, especially when supports can travel with the participant across settings.

APM recommends:

- **Framing employment transitions as supported pathways**, not abrupt exits, ensuring continuity of support, job coaching, and career development beyond placement milestones.
- **Investing in and supporting hybrid models** that offer supported jobs in inclusive, open environments, with strong linkages to further opportunities and career progression – including work crews.
- **Extending support duration for participants** with complex or episodic needs, including those transitioning from ADEs or social enterprises to mainstream employment.
- **Monitoring quality and outcomes over time**, with an emphasis on participant experience, autonomy, skill development, and long-term inclusion.

Transitions done well are not disruptive, they are empowering. With the right scaffolds, participants can explore new opportunities, build confidence, and move towards sustainable employment in a way that respects their pace, preferences, and needs.

Responses to Key Consultation Questions

What is your ideal future state for the supported employment sector and employment of people with high support needs?

APM's vision for the future of supported employment is a system in which every person with disability, regardless of support needs, can access and sustain meaningful work in inclusive environments of their choice, with the right supports in place at the right time. This vision is underpinned by:

- **Genuine choice and control**, where participants can choose from diverse employment models, including open employment, social enterprise, self-employment, and modernised supported workplaces.
- **An inclusive labour market**, where employers are confident, capable and supported to hire and retain people with disability.
- **A responsive, integrated service ecosystem**, where supports follow the person, not the program—adapting to changing needs, aspirations, and life stages.
- **Evidence-informed practice**, where investment and policy are guided by what works to deliver long-term inclusion and outcomes.

In this future state, supported employment settings are no longer default or isolated pathways. Instead, they are one part of a broader continuum, alongside inclusive social firms, micro-enterprises, public sector employment initiatives, and open market jobs, with strong linkages and transition points between them.

What additional actions are necessary to increase employment of people with high support needs in open/inclusive settings?

To substantially increase inclusive employment for people with high support needs, reform efforts must shift from program redesign in isolation to whole-of-system change. APM recommends:

- **Expand access to customised employment approaches** by fully recognising the cost to deliver these supports, enabling providers to deliver person-led job design, discovery processes, and flexible workplace arrangements.
- **Strengthen employer engagement strategies**, including funded workplace coaching, disability confidence training, and more sustainable wage subsidies for employers hiring people with complex support needs.
- **Develop social enterprise and social firm capacity** to act as transitional and inclusive employment environments, particularly in regional and remote areas.
- **Enable longer duration and portable in-work supports**, particularly for people transitioning from supported employment or with episodic disabilities.
- **Embed inclusive employment goals within the NDIS planning process**, supported by trained planners, clear operational guidance, and effective engagement with employment providers.
- **Invest in workforce development across the ecosystem**, ensuring providers, LACs, educators and employers have the skills and shared language to enable inclusive work pathways.

What would you like to see included in a Plan or Roadmap for the supported employment sector?

APM supports the development of a National Inclusive Employment Roadmap, co-designed with people with disability, providers, and employers. This roadmap should:

- **Articulate a shared vision and long-term goals** for inclusive employment outcomes, including increased rates of participation, progression, and pay equity for people with high support needs.
- **Define clear transition milestones** for providers currently delivering supported employment alongside the resourcing for organisational transformation, workforce upskilling, and service redesign.
- **Fund bridge models and transitions**, including social firms, inclusive enterprises, and embedded support within open employment settings.
- **Outline safeguard mechanisms** to ensure participants are not disadvantaged, displaced, or left without access to meaningful employment during reform.
- **Align incentives and funding across systems**, including NDIS, DES, the income support system, and vocational education.
- **Include a robust evaluation and reporting framework**, measuring success not just by job placement, but by participant experience, wage growth, job quality, and long-term inclusion.

A roadmap of this kind must be resourced, sequenced, and embedded across jurisdictions and portfolios. It must also be accompanied by investment in data infrastructure, inclusive design capabilities, and meaningful lived experience leadership.

Is there a role for workplaces which provide specialised employment opportunities for people with disability in the future?

APM believes there will always be a place for workplaces which provide specialised employment opportunities for people with disability in an employment ecosystem that values and supports choice and control. What constitutes meaningful employment is different for every person, and for many people with complex disability and high support needs, what is meaningful is being able to work with their peers in a supportive environment.

As mentioned above, it is critical that these workplaces are modernised and provide opportunities for career development, transition in and out (act as true intermediary models) and pay equitable wages.²

How can the benefits of supported employment settings be reflected in open employment settings?

Supported employment settings offer strengths that are critical to meaningful and sustained workforce participation, especially for employees with higher support needs. These include structured routines, skilled and available job coaches/supports, a high degree of predictability, tailored tasks, supportive peer environments, and built-in flexibility. These features not only promote participation/task completion, but also belonging, confidence and a sense of contribution – the things we all look for in work.

As outlined in the consultation paper, to successfully scale inclusive employment in open settings, we need to ensure that these enabling factors remain front and center. The goal must be to not just transition people out of supported employment, but to embed the most effective elements of it in the broader labour market, building a more supportive, resilient and effective employment environment for people with disability and employers alike.

Conclusion

The future of supported employment in Australia must be built on the values of dignity, inclusion, and possibility. As reform efforts continue, APM urges government to take a long-term, integrated, and participant-led approach that recognises the complexity of employment journeys, especially for people with high support needs.

This means going beyond programmatic changes to build a connected ecosystem: one where supports are portable, transitions are scaffolded, and employment is seen not just as an outcome, but as a life opportunity. It also means preserving what works, such as the relational, tailored, and enabling features of supported employment, and embedding these into the design of inclusive, open work environments.

APM is here to support the transition through evidence-informed practice, strong employer partnerships, and unwavering commitment to participant outcomes. With the right vision, safeguards, and system enablers in place, we can deliver a future where inclusive employment is not the exception but the norm.

We welcome the opportunity to continue to engage with the department and government on realising the vision for the future of the system.

² While we have chosen not to respond to the specific question on wages and are supportive of productivity-based wage systems when applied fairly, we have concerns with the current Supported Employment Services Award (MA000103) in that it allows productivity-based wages to be applied to sub-minimum wages (via Classification of Grade A or B employees).