

Autism Queensland's Response to "Next steps in supported employment: consultation on the way forward"



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Autism Queensland's Response to: Next steps in supported employment: consultation on the way forward, discussion paper.

Executive Summary:

A Future of Inclusive Employment for People with Disability

Autism Queensland (AQ) advocates for a fundamental paradigm shift in disability employment: transitioning from segregated models to a fully integrated, inclusive Australian labour market. Our overarching message is clear – people with disability, particularly those with high support needs, deserve **meaningful open employment, full award wages, and genuine self-determination**.

To achieve this vision, AQ recommends a national roadmap centred on four key pillars:

1. **Mandate True Inclusion & Equal Pay:** Implement a clear sunset clause for segregated employment and legislate the end to sub-minimum wages, ensuring equal pay for equal work as a universal standard.
2. **Transform Support & Pathways:** Require evidence-based, person-centred supports, for example, like Customised Employment (CE) and Individual Placement and Support (IPS), ensure flexible, adequately funded NDIS plans, and foster seamless, lifelong transitions with a highly skilled, neurodiversity-affirming professional workforce.
3. **Empower Inclusive Employers:** Provide targeted incentives and practical support to employers, promote innovative job design, and establish government at all levels as a model employer for people with disability.
4. **Drive Systemic Accountability & Lived Experience Leadership:** Implement robust national data collection, reform income support systems to remove work disincentives, lead national awareness campaigns promoting autistic strengths, and embed lived experience in the co-design and governance of all employment policies and services.

AQ is committed to collaborating on this vital roadmap to build a truly equitable and economically empowered employment future for all autistic and neurodivergent Australians.

Question 1. Is there any other existing work that is missing from the table in Appendix 3?

Upon reviewing the table, we have not identified any existing work that is missing.

Question 2. What is your ideal future state for the supported employment sector and employment of people with disability with high support needs?

A Future of Inclusive Employment

AQ envisions a future for the supported employment sector where the concept of a separate entity largely phases out. Instead, employment supports are fully integrated into a broader, inclusive Australian employment landscape. This integrated system would champion meaningful, open employment for all people with disability, particularly those with high support needs. Our aim is to ensure they can work in jobs they choose, contribute skills, and lead full, economically empowered lives within an inclusive environment. This vision aligns with the Australian Disability Strategy 2021-2031, particularly its focus on employment reform and greater inclusion in the mainstream labour market (Australian Government, 2023).

Main Features of this Ideal Future:

- **Open Employment as the Universal Standard:** AQ believes in a future where segregated employment settings are no longer the norm.
- **Meaningful Roles and Equal Pay:** People with high support needs are employed in diverse, mainstream industries, contributing their unique skills to roles that genuinely match their aspirations. Crucially, all employees with disability should receive full award wages for their work, moving away from sub-minimum wages. This principle of "equal pay for equal work" is central to economic empowerment and dignity (National Disability Insurance Agency, 2019).
- **Genuine Inclusion:** We champion workplaces that are truly inclusive, fostering environments where people with high support needs are valued team members, participating fully in all aspects of work, with natural supports from colleagues. This goes beyond mere physical presence to genuine belonging and contribution, which is a hallmark of successful inclusive workplaces (Schur et al., 2014).
- **Evidence-Based, Person-Centred Support:** For autistic individuals and others with high support needs, AQ suggests that proven models like CE become universally accessible and preferred services. Our Autism EmployABLE program, for instance, has demonstrated significant improvements in employment outcomes when these models are delivered by a highly skilled and professional workforce (Ashburner et al., 2024). This success aligns with the strong evidence base for CE in achieving competitive, integrated employment (Albin et al., 2021; Metzel et al., 2017).
- **Lifelong, Flexible, and Responsive Support:** AQ recognises the importance of continuous, flexible, and adequately funded supports that adapt to an individual's changing needs throughout their working life. This acknowledges that employment journeys are dynamic and require adaptable, long-term support, effectively resourced through frameworks like the NDIS (National Disability Insurance Agency, 2019).
- **Proactive and Seamless Transition Pathways:** Clear, well-resourced pathways from education to employment and into career advancement, with services working in unison

to avoid gaps in support. Early intervention and effective transition planning are critical for improving post-school employment outcomes for young people with disability (Cocks & Boadle, 2020).

- **Empowered Choice and Control:** People with high support needs have genuine and informed choice and control over their employment goals, job pursuits, and how their supports are delivered, with supported decision-making embedded throughout. This aligns with the NDIS' core principle of choice and control, empowering individuals to direct their own lives and employment aspirations (National Disability Insurance Agency, 2019).
- **Shared Employer Responsibility and Genuine Partnerships:** AQ sees employers as vital, active partners in creating inclusive workplaces, understanding their legal obligations and the tangible business benefits of diversity. Employers need easy access to practical resources, training, and expert advice to build disability confidence (Schur et al., 2014). Our recent experience delivering the Neurodiversity Works Program involved partnering with employers and their current staff to enhance understanding of neurodiversity, neurodivergent conditions and communication difference in the workplace which ultimately had very successful outcomes for all stakeholders.
- **Sustainable Funding Models:** We advocate for funding that is flexible and sufficient, allowing providers to deliver high-quality, intensive, and individualised services. There is a move away from payment-by-outcome models that can inadvertently disincentivise supporting those with the highest needs, towards models that truly reflect the cost of quality, person-centred support (Australian Government, 2023).
- **Societal Cultural Shift:** Society, including families, educators, employers and service providers, hold high expectations for the employment potential of people with high support needs, fostering aspirations for meaningful careers from an early age. This fundamental shift in societal attitudes is key to breaking down barriers and promoting inclusion (Cocks & Boadle, 2020).
- **Challenging Stereotypes:** Ongoing education and awareness campaigns actively challenge stereotypes and clearly demonstrate the value, capabilities, and contributions of people with high support needs in the workplace and community. Positive narratives and role models are highlighted as powerful tools for shifting public perception (Australian Government, 2023).
- **Lived Experience Leadership:** AQ considers it vital people with disability, especially those with high support needs, genuinely lead and co-design the systems and services that impact their employment. This ensures policies are responsive, relevant, and effective, embodying the principle of "nothing about us, without us" (United Nations, 2006).

Question 3. What additional actions do you consider are necessary to increase employment of people with high support needs in open/inclusive settings?

To significantly increase the employment of people with high support needs in open and inclusive settings, a multifaceted effort is required across various levels. Building on the vision of an inclusive future, the following actions are essential:

A. Strengthening the Ecosystem of Support and Service Delivery

- **Mandatory Use of Evidence-Based Models:** These evidence-based models become the default and mandatory approaches for NDIS employment support providers assisting people with high support needs. This isn't just about advocating for their use; it requires robust quality assurance and performance monitoring to ensure adherence to these proven methodologies. Research consistently demonstrates the effectiveness of these models in achieving competitive, integrated employment outcomes for individuals with significant disabilities (Ashburner et al., 2024; Albin et al., 2021; Metzel et al., 2017).
- **Neurodiversity-Affirming Expertise & Capacity Building:** AQ calls for substantial investment in continuous professional development for employment specialists. This includes comprehensive training in areas such as enhanced understanding of specific high support needs, particularly neurodiversity-affirming practices, job carving, effective employer engagement, strategic use of assistive technology and positive behaviour support. A highly skilled workforce is critical for delivering quality support that leads to successful employment. AQ has demonstrated significantly improved outcomes when individuals are supported by specialists with expertise pertaining to their needs (Ashburner et al., 2024; Butterworth et al., 2021).
- **Seamless Inter-Agency Collaboration and Data Sharing:** Establishing formal, mandated protocols for data sharing and coordinated planning between the NDIS, mainstream employment services (including the Inclusive Employment Australia program), education, health, and housing sectors is vital. This ensures a "no wrong door" approach and prevents individuals from falling through the cracks during critical transitions. Integrated service delivery models are widely recognised as key to improved outcomes (Cocks & Boadle, 2020).
- **Flexible and Adequately Funded NDIS Plans for Employment:** NDIS plans must consistently and sufficiently fund employment supports for individuals with high support needs. This means providing highly individualised, ongoing, and intensive supports, moving beyond rigid funding categories to genuinely person-centred allocations that reflect real-world needs. Inadequate or inflexible funding is a significant barrier to effective employment support (National Disability Insurance Agency, 2019).
- **Development of "Micro-Enterprise" and Self-Employment Supports:** AQ advocates for recognising and actively supporting pathways to self-employment and micro-businesses as viable open employment options, particularly for those with unique skills or who may find traditional workplace structures challenging. This includes accessible business development support and mentoring. Clay Lewis, an autistic entrepreneur, serves as a publicly celebrated example of the success achievable with tailored support for self-employment (Queensland Government, 2023).

B. Deepening Employer Engagement and Capacity

- **Targeted Employer Incentives and Supports:** Beyond basic wage subsidies, we suggest exploring more comprehensive incentives. This could include "Disability Confident Business" certification programs providing practical toolkits and resources, as well as more substantial financial incentives (e.g. enhanced tax breaks) for larger, systemic accessibility and adjustment investments. Employer confidence and capacity are major determinants of inclusive hiring (Schur et al., 2014).
- **Leadership by Government as an Employer of Choice:** All levels of government (Commonwealth, State, Local) need to demonstrate best practice by setting ambitious employment targets for people with high support needs within their own workforces. By proactively implementing inclusive recruitment, onboarding, and retention strategies, they lead by example for the private sector.
- **Innovation in Job Design and Task Re-allocation:** Actively promoting and providing expert consultation to employers on innovative job design, including job carving, flexible work arrangements, and leveraging technology, can create roles that maximise the contributions of all employees, including those with diverse abilities. This approach moves beyond traditional job descriptions to unlock new possibilities (Callus, 2022).

C. Driving Systemic Change Through Policy and Funding

- **Robust Accountability and Transparency:** AQ seeks the implementation of a comprehensive national data collection and reporting framework that tracks employment outcomes for people with high support needs, including retention, career progression, and wages. This data should be publicly accessible to drive accountability across the sector and inform evidence-based policy adjustments. Effective data collection is fundamental for system improvement (Australian Government, 2023).
- **Performance Frameworks for Service Providers:** There is a need to develop and enforcing performance frameworks for all employment service providers that prioritise quality outcomes in open/inclusive employment for people with high support needs, moving away from purely quantity-based metrics. This aligns with recent reforms and the Australian Disability Strategy's focus on meaningful results (Department of Social Services, 2024; Australian Government, 2021).
- **National Awareness and Anti-Discrimination Campaigns:** AQ advocates the use of sustained, high-profile public awareness campaigns that not only challenge stereotypes but also highlight the economic and social benefits of employing people with disability, featuring positive stories of individuals with high support needs thriving in open employment. This is a key component of the Australian Disability Strategy's goal to shift community attitudes (Australian Government, 2021; Department of Social Services, 2025).
- **Review and Reform of Income Support Systems:** We urge a critical examination of how current income support systems (e.g. DSP) might inadvertently create disincentives to work, particularly for those with high support needs. We suggest exploring models that allow for gradual tapering of support, aiming to guarantee no financial disadvantage when entering or increasing employment, to address recognised challenges within the social security framework (Treasury, 2023; Marston et al., 2009).

- **Embedding Lived Experience in Policy and Program Design:** AQ believes in going beyond consultation to genuinely co-design policies, programs, and service models with people with high support needs and their representative organisations. Providing resourcing and training for lived experience leaders to actively participate in decision-making bodies is crucial, reflecting international conventions and Australian policy commitments to empower people with disability in decisions that affect them (United Nations, 2006; Australian Government, 2021; AIFS, n.d.).

Question 4. The Royal Commission recommended the development of a Plan or Roadmap to guide further reform in the supported employment sector. What would you like to see included in such a plan?

AQ welcomes the Royal Commission's recommendation for a Plan or Roadmap to guide reform in disability employment. This roadmap must drive a fundamental paradigm shift towards genuine inclusion and self-determination for autistic individuals within the open labour market. AQ's vision is rooted in systematically and mindfully phasing out the "supported employment sector" as a distinct, segregated entity, instead advocating for full integration of employment supports into a truly inclusive Australian employment landscape that champions meaningful, open opportunities for all people with disability, particularly those with high support needs, including autistic individuals.

The specific, essential actions that form the core of such a roadmap are detailed comprehensively in our response to Question 3: "What additional actions do you consider are necessary to increase employment of people with high support needs in open/inclusive settings?"

In addition to those detailed actions, this roadmap needs to firmly establish the following foundational principles and legislative mandates:

- **Phased Elimination of Segregated Employment Models:** The roadmap must outline a clear sunset clause for traditional Australian Disability Enterprises (ADEs). This means a firm, time-bound plan for the transition away from segregated employment models for new entrants, moving towards supported transition for existing participants. This is critical for dismantling systems that have historically limited opportunities and perpetuated sub-minimum wages (Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, 2023).
- **Promotion of Autistic Strengths and Contributions:** Beyond anti-discrimination, the roadmap actively integrates and promote a societal shift towards recognising and valuing the unique strengths and perspectives that autistic people bring to the workforce (e.g. pattern recognition, attention to detail, innovative thinking, and loyalty). This needs to be a proactive element of national awareness campaigns.

AQ stands ready to collaborate with the government and all stakeholders in the development and implementation of this vital roadmap, ensuring it leads to a truly inclusive and equitable employment future for all autistic and neurodivergent Australians.

Question 5. How could the sector best increase wages for people with disability while avoiding job losses?

Increasing wages for people with disability while avoiding job losses is a critical and complex challenge that requires a multi-faceted approach, focusing on enhancing productivity in open employment settings and reforming payment structures. AQ proposes the following strategies:

- **Phased Transition with Robust Support:** The Royal Commission has highlighted the need for a sunset clause for sub-minimum wages (Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, 2023). To avoid job losses, this transition must be:
 - **Gradual and Supported:** Implement a phased increase of wages for existing employees, accompanied by comprehensive transition support packages for both employees and employers. This includes enhanced, individualised NDIS funding for intensive on-the-job support and capacity building.
 - **Focus on Productivity in Open Employment:** Emphasise strategies that enhance the productivity and value of employees with disability in open, mainstream settings. This is key to justifying full award wages.
- **Expand and Mandate Evidence-Based Models:** Universal adoption and fidelity monitoring of evidence-based models for individuals with high support needs are crucial. These models focus on job carving, task analysis, and matching individual strengths to employer needs, inherently supporting productivity and valuing the employee's contribution in mainstream settings.
- **Invest in Workplace Capability Building:**
 - **Employer Education:** Fund targeted training programs for employers on neuro-inclusion, job carving, reasonable adjustments, and understanding the business benefits of a diverse workforce. This includes practical tools for creating truly inclusive environments where productivity can thrive (JobAccess, 2025; business.gov.au, n.d.).
 - **Peer-to-Peer Mentoring:** Support programs where businesses successfully employing people with disability share their strategies and best practices with others.
 - **Specialised Intermediaries:** Increase funding for specialist disability employment services that provide ongoing, intensive support to both employees and employers, ensuring job retention and fostering career progression towards higher earning potential (National Disability Insurance Agency, 2021).
- **Leverage Social Procurement and Social Enterprise:**
 - **Government Leadership:** Mandate and incentivise all levels of government to significantly increase their social procurement from social enterprises and businesses that genuinely employ people with disability in open wage settings (Queensland Government, n.d.; Social Traders, n.d.). This creates demand for ethical employment.

- **Support for Micro-Enterprises and Self-Employment:** Actively support pathways to self-employment for individuals with high support needs, ensuring they receive adequate business development support to establish and sustain viable ventures that can pay themselves award-equivalent wages.
- **Hybrid Employment Models:** Explore and support hybrid models where individuals may work for a social enterprise that builds their skills and confidence, with a clear pathway and active support to transition to open, award-wage employment as their skills and confidence grow (Inclusion Australia, 2023). This must not be a new form of segregated employment but a bridge to the open market.
- **Reform Income Support and NDIS Funding:**
 - **Remove Disincentives:** Review and reform income support systems (e.g. DSP) to ensure they do not create disincentives to work or increase hours, allowing for gradual tapering of support that guarantees no financial disadvantage when entering or increasing employment (Treasury, 2023).
 - **Flexible NDIS Funding:** Ensure NDIS plans consistently and sufficiently fund the high-quality, intensive, and long-term employment supports required for individuals with high support needs to secure and maintain award wage jobs, moving away from payment-by-outcome models that can inadvertently disincentivise supporting those with the highest needs (Department of Social Services, 2024).
- **Promote Business Case for Diversity:** Actively promote the tangible business benefits of employing people with disability, including increased innovation, problem-solving, customer loyalty, and reduced staff turnover. This shifts the perception from a 'cost' to an 'asset' (RSM Global, 2025).

By focusing on these interconnected strategies, the sector can foster an environment where wages for people with disability increase as a natural outcome of enhanced inclusion, productivity, and a commitment to equal value in open employment, thereby avoiding detrimental job losses.

Question 6. Do you see a role for workplaces which provide specialised employment opportunities, for example a social enterprise with a specific business model that supports people with disability, in the long-term future of the employment of people with disability with high support needs?

AQ acknowledges that workplaces providing specialised employment opportunities, such as social enterprises, can play a transitional or niche role in the long-term future of employment for people with disability with high support needs, provided they are firmly aligned with the principles of genuine open employment and do not perpetuate segregation or sub-minimum wages.

Our ideal future state is indeed mainstream, open employment (as outlined in Question 2). However, we recognise that for some individuals with very specific or intense support needs, or during critical transition periods, specialised environments *could* offer benefits under strict conditions:

- **Transitional Pathways:** Social enterprises can serve as valuable stepping stones, providing a highly supportive and structured environment where individuals can build pre-employment skills, gain work experience, develop social capital, and foster confidence before transitioning to open, mainstream employment. The success of such a role hinge on explicit and well-resourced transition pathways, with clear goals for moving individuals into competitive, award-wage jobs in the wider labour market. They should not be an endpoint but a bridge.
- **Niche Opportunities and Skill Development:** Some social enterprises may create unique, niche employment opportunities tailored to specific strengths and interests, particularly for autistic individuals (e.g. in technology, data analysis, or specific creative fields where highly focused skills can be leveraged). They can also provide a safe space to develop skills in a commercial setting that might be too overwhelming in a traditional workplace initially for example Jigsaw Australia.
- **Psychological Safety and Community:** For some, the initial period of entering employment can be overwhelming. A specialised setting that explicitly prioritises psychological safety, understanding, and peer support can be beneficial for mental health and confidence, allowing individuals to develop foundational work habits in a less demanding environment (LeaderFactor, n.d.).
- **Innovation in Support Delivery:** Social enterprises can be incubators for innovative support models (e.g. bespoke sensory environments, tailored communication strategies, on-site positive behaviour support) that might eventually be transferable to mainstream workplaces.

However, AQ stresses that for specialised employment opportunities to have a positive and ethical role, they must:

- **Pay Full Award Wages:** Any specialised employment setting must commit to paying full award wages, reflecting the principle of "equal pay for equal work" (Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, 2023). The historical legacy of sub-minimum wages in segregated settings must not be replicated.

- **Prioritise Choice and Control:** The individual must have genuine and informed choice to participate in such a setting, and clear control over their employment goals and pathways, with supported decision-making embedded.
- **Be Time-Limited or Pathway-Focused:** If these are not genuine, permanent award-wage open employment positions, they must have clear, individualised, and funded pathways to open employment. There needs to be a strong emphasis on capacity building for the individual to move to mainstream roles (NDIS, n.d. "From ADEs to Open Employment" research).
- **Avoid Becoming New Forms of Segregation:** The sector must be vigilant to ensure these workplaces do not become new, disguised forms of segregated employment that limit opportunities and perpetuate lower expectations. Their business model should primarily serve the employment goals of the individuals, rather than simply leveraging their labour for profit under conditions below open employment standards (OranaOnline, n.d.; National Disability Services, n.d. "Customised Employment" report).
- **Focus on Individual Capability Building:** Their purpose must be demonstrably focused on building the individual's skills, confidence, and readiness for broader employment, and not on maintaining individuals within a sheltered environment long-term.

In summary, while the long-term vision is firmly open employment, well-governed and ethically managed specialised employment opportunities can serve a limited, transitional, or niche purpose, but only if they fully align with principles of fair pay, choice, and a clear, intentional pathway to genuine inclusion in the mainstream labour market.

Question 7. How could the benefits of supported employment settings be reflected in open/inclusive employment (e.g. a sense of community, highly tailored support, flexible roles)?

The transition to open and inclusive employment does not mean sacrificing the genuine benefits some individuals experienced in the 'supported employment' context. Instead, the focus must be on transferring and enhancing these benefits within mainstream workplaces. AQ believes the positive aspects of supported employment, such as a sense of community, highly tailored support, and flexible roles, can and should be integrated into genuinely inclusive open employment settings through intentional design and strategic investment.

Here's how:

- **Fostering a Sense of Community and Belonging:**
 - **Inclusive Workplace Culture:** Promote psychological safety and a sense of belonging in mainstream workplaces where all employees feel valued and respected (LeaderFactor, n.d.). This goes beyond physical presence to genuine acceptance.
 - **Peer Support Networks:** Encourage and facilitate natural peer support within teams. For neurodivergent employees, this could involve creating formal or informal neurodivergent affinity groups or mentoring programs within larger organisations (Jigsaw Australia, 2024; Australian Disability Network, n.d.).
 - **Disability Employee Resource Groups (ERGs):** Support the establishment of ERGs that provide a community, advocacy platform, and social connection for employees with disability.
 - **Social Inclusion in the Workplace:** Encourage social interaction and team-building activities that are genuinely inclusive of diverse communication styles and social preferences.
- **Delivering Highly Tailored and Individualised Support:**
 - **High-Fidelity Customised Employment & IPS Models:** These models are designed to provide highly individualised, ongoing, and flexible support. This includes intensive job coaching, task analysis, job carving, and continuous adaptation of supports to the individual's evolving needs, directly in the open employment setting (Becker & Drake, 2003; Bond et al., 2019).
 - **Flexible NDIS Funding:** Ensure NDIS plans are robust, flexible, and consistently funded to provide the necessary level of individualised support, including support coordination, assistive technology, positive behaviour support, and ongoing coaching that can adapt to changing job roles or personal needs.
 - **Neurodiversity-Affirming Practices:** Train employment specialists and workplace leaders in neurodiversity-affirming approaches, understanding unique communication styles, sensory needs, and strengths, allowing for truly tailored accommodations and support strategies (Special Strong, n.d.).
 - **On-Site and Remote Support:** Ensure support can be delivered on-site, remotely, or via hybrid models, as best suits the individual and the employer.

- **Creating Flexible and Adaptable Roles:**

- **Proactive Job Design and Carving:** Employers, with expert support, should be encouraged and resourced to rethink traditional job descriptions. This involves job carving (creating roles from existing duties), flexible work arrangements (hours, location), and leveraging technology to create roles that maximise an individual's strengths and accommodate support needs, rather than fitting individuals into rigid existing roles (Callus, 2022).
- **Task Re-allocation:** Managers are supported to re-allocate tasks within teams to optimise the strengths of all employees, allowing individuals with disability to focus on areas where they excel.
- **Understanding of Neurodivergent Strengths:** Promote an understanding among employers of the unique skills and perspectives autistic and neurodivergent individuals can bring, such as attention to detail, pattern recognition, innovative thinking, and loyalty, allowing for roles to be designed to harness these strengths.

By actively transferring and embedding these benefits into mainstream workplaces, the transition to open employment can be successful and sustainable, ensuring that individuals with high support needs not only find jobs but thrive in truly inclusive and supportive environments.

Conclusion

AQ's core message is a call for a fundamental shift: to transition from segregated employment to a truly inclusive Australian labour market where all people with disability, including those with high support needs, experience meaningful open employment and equal pay. Our most critical recommendations centre on legislating the phased elimination of segregated models and sub-minimum wages, mandating evidence-based, person-centred supports, empowering inclusive employers, and embedding lived experience leadership in all systemic reforms.

This consultation represents a vital opportunity to enact meaningful reform that will genuinely transform employment outcomes and foster greater economic empowerment for people with disability. The time for change is now.

AQ thanks the Department for the opportunity to provide this feedback.

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