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CONSULTATION ON NEXT STEPS IN SUPPORTED EMPLOYMENT

The Centre for Social Impact at Swinburne University of Technology (CSI Swinburne) thanks the Department for the opportunity to make this response.

CSI Swinburne is a multi-disciplinary research centre established in 2014 and is a part of the national CSI Network. Our research strives toward positive social change through improving the systemic and organisational conditions and practices that shape communities. CSI Swinburne has been undertaking a wide range of research into the inclusion of people with disability in the area of employment. In addition, we have previously undertaken work with the Department of Social Services to inform the Information, Linkages and Capacity Building (ILC) investment.

Over the past three years we have conducted more than twenty studies examining factors associated with disability employment and evaluating programs designed to support the employment of people with disability. We are the largest evidence centre in Australia focusing on disability employment with a dedicated team of researchers working in this field. Of particular relevance to this Discussion Paper we have undertaken research in relation to:

- Evaluation of Down Syndrome Australia Employment Connections Service – a bespoke employment service for people with Down syndrome across Australia consistent with international evidence for Supported Employment practice (available on request)
- Sustainability study of the Down Syndrome Australia Employment Connections Service – a financial and policy analysis of the costs of delivering this model of employment service and potential revenue models (including the NDIS) (available on request)
- The WISE-Ability model – developing a model for ADE transformation focusing on organisational and practice elements to foster employee wellbeing and transition to open employment outcomes. The model has been now rolled out into 12 ADE and work integration social enterprise (WISE) settings.
<https://wiseabilitymodelaustralia.org.au/wp-content/uploads/2024/09/WISE-Ability-Social-Impact-Project-Report.pdf>
- An analysis of the enablers and barriers to potential new entrants from specialist cohort providers to the Specialist Disability Employment Program (now Inclusive Employment Australia) (available on request).
- Growing intellectual disability employment in the NSW public service.
<https://apo.org.au/node/330753>
- Evaluation of the White Box Enterprises Payment By Outcome 3 Trial for social enterprises focused on disability employment,
https://assets.csi.edu.au/assets/WBE_PBO-Evaluation-Interim-Report-November-

[2023.pdf](#); and https://assets.csi.edu.au/assets/research/Evaluation-of-the-Payment-by-Outcomes-Trial-3_Year-2-Report_October-2024.pdf

- Evaluation of the White Box Enterprises Evolve ADE transformation program (ongoing)
- Evaluation of the Australian Human Rights Commission's IncludeAbility program, including a pilot to increase the employment of people with intellectual disability. <https://assets.csi.edu.au/assets/Final-Report-AHRC-IncludeAbility.pdf>
- Evaluation of several employer-facing initiatives to increase employment of people with disability (including Australian Disability Network's 'Employing 100' program <https://apo.org.au/node/330713> and The Achieve Foundation's 'Disability Employment Catalyst' - ongoing)
- Analysis of the employment-focused services and activities of a large disability service provider, and a program logic for their expansion and uplift
- Evaluation of social enterprises seeking to support employment for people with disability (ongoing)
- School to work transition for people with intellectual disability. <https://apo.org.au/node/326979>
- The 'Explaining the evidence for reform' series – a six part series examining the need for employment policy and program reform for people with intellectual disability and high support needs <https://apo.org.au/node/321816>.

We have provided the findings of our research to numerous inquiries, commissions and consultations over the past several years as part of our commitment to sharing evidence to inform policy and legislation design.

We believe we are the largest research group in Australia undertaking long-term investigation of supported employment in Australia. We are happy to be contacted for further information and evidence. Contacts can be directed to: ewilson@swin.edu.au

Again, thank you for the opportunity to contribute to this important area of work.

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RESPONSE TO THE NEXT STEPS IN SUPPORTED EMPLOYMENT

PAPER

Summary of key response points

1. The concept of ‘supported employment’ in Australia does not align with international evidence and, as such, the terminology is confusing and not well understood.
2. It is important to distinguish between and redefine concepts as follows in Table 1 (noting this differs from those in the Discussion Paper which overly equates supported employment with Australian Disability Enterprises).

Table 1: Supported Employment Definitions

Term	Definition
Supported employment job	A job situation that provides suitable supports and adjustments to enable employment of a person with disability with high or ongoing support needs. The job can be in any setting, including ADEs, social enterprises, open employment and self employment (including micro business). While the international literature requires ‘supported employment’ jobs to be full award wages, in Australia they currently include full award wages as well as those under the Supported Wage System.
Supported employment pathway	This includes activities that lead to employment such as work experience, training, and internships, among other strategies, but that may or may not be paid any wage.
Supported employment service	A service that provides activities that support the employment pathway and the attainment of a supported employment job. This may be a stand alone service or a part of another wider service or initiative type (e.g. social enterprise or one that targets a wider range of people with disability or other needs). NOTE: this definition is not consistent with that of the Commonwealth and the DRC that overly aligns the definition with Australian Disability Enterprises (ADE). ADEs are only one type of supported employment service.
Supported employment practice	An evidence-based approach, type of support or deployment of strategies to create, shape or support employment of a person disability with high support needs. Supported employment practices encompass any or all of those associated with personalised client assessment (getting to know the person well); developing employment plans; job matching, customisation and placement; workplace adjustments; job training; ongoing job support; employer

	and workplace readiness and capability building; ongoing employer support; addressing wrap-around support needs; support to plan and operate self employment.
Supported employment sector	The range of providers of initiatives, supports and services that foster and sustain supported employment jobs in diverse settings. This includes jobs-focused social enterprises/work integration social enterprises (WISE), employment service providers who work with those needing supported employment, Australian Disability Enterprises, disability employment initiatives and programs (often run by not-for-profit organisations), self employment and micro business support services, and intermediaries supporting the sector.
Market of supported employment service providers	The providers offering supported employment services as part of the quasi market of the NDIS or Commonwealth Active Labour Market programs such as Inclusive Employment Australia. In the context of the NDIS, this draws attention to the number, type, reach and sustainability of service providers from which NDIS participants can purchase supported employment services.
A person with disability with high support needs	Support needs result from a combination of or interaction between personal factors, impairments and the environment. Some support needs remain consistent across most settings (for example, the need for support to toilet, eat or prevent choking). Some needs may be further exacerbated by the environment (for example behavioural needs). High support needs are those that are specialised or complex, and/or have a level of longevity and/or extensive levels of support. The individualised and contextual nature of these needs means it is not possible to standardise an approach to identifying which individuals will require them (for example, by disability type).
Supported Wage System	A specific wage or remuneration type as defined by the Fair Work Commission

3. Australian Disability Enterprises (ADEs) require a re-definition and re-conceptualisation as part of ADE transformation and as part of understanding their role in the broader supported employment sector.

Summary of response to consultation questions

Major initiatives improving inclusive employment

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

There is a need to include:

- Updating the guidelines for the new Inclusive Employment Australia program (i.e. the new Disability Employment Service model) to ensure supported employment service delivery is included.
- NDIS employment-related funding.
- Information, Linkages and Capacity Building (ILC) funding.

Increasing inclusive employment – Recommendation 7.30

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

- The recognition and active fostering of a diverse sector of supported employment service providers who foster and sustain supported employment in diverse settings, sectors, industries and geographies.
- Adequate financial models for the delivery of supported employment.
- Funding and investment design that joins up parts of the system required to deliver supported employment so that jobseekers and supported employees can utilise complementary funding and supports to deliver the type and quantum of supported employment services to suit their needs and those of their employers.
- Policy design that equally values different types and levels of employment without disqualifying or penalising people who can only work a small amount of hours per week.

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

- Redesign of the Inclusive Employment Australia program to ensure utility for people with high support needs and low work capacity
- Development of the employment services ‘market’ of NDIS providers
- Significant employer capability building
- Establishment of relevant talent pipelines
- Changes to vocational education and training
- Changes to the Disability Support Pension.

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?

- Changing the definition of ‘supported employment sector’
- A reconceptualization of Australian Disability Enterprises and particularly a focus on understanding what ‘transformation’ is required and how best to attain it.

Raise subminimum wages – Recommendation 7.31

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

a. Are there examples that currently exist that can be leveraged?

b. Are there new approaches that could be tested?

- A strong focus on productivity uplift for employees on supported wage
- Investment in pathways to employment/ full award wages
- Training wage arrangements
- Reconceptualise ADEs to better delineate paid work activities from non paid activities
- Innovative funding models that address impact costs.

Ending segregated employment – Recommendation 7.32

6. Do you see a role for workplaces which provide specialised employment opportunities for people with disability in the future?

a. If so, what should these workplaces look like?

- Specialised workplaces are a feature of many WISEs.
- The WISE-Ability model is one model that seeks to identify the key ingredients of such a model.
- There is a need for significant further work to understand the needs and suitable solution for work environments for people with very significant support needs who are at extra risk in workplace environments.

7. How could the benefits of supported employment settings be reflected in open employment settings?

- The WISE-Ability team have begun to consider how this model, or parts of it, may be translated to open employment settings.

DETAILED RESPONSE - FURTHER INFORMATION

Before responding to each of the questions in the Discussion Paper it is important to understand the need for the redefinition of ‘supported employment’ and the reconceptualization of Australian Disability Enterprises. We commence with this below.

Defining ‘supported employment’

The evolution of defining the ‘Supported employment sector’

The Disability Royal Commission has helped shape a revised framing of a sector called ‘the Supported Employment Sector’ and this is referenced within the Discussion Paper ‘Next Steps in Supported Employment’. However, it is important to understand a fuller context of the history of this ‘sector’

With the end of the Disability Services Act 1986, the legislative definition of ‘supported employment services’ ended. Previously, within this Act:

supported employment services means services to support the paid employment of persons with disabilities, being persons:

(a) for whom competitive employment at or above the relevant award wage is unlikely; and

(b) who, because of their disabilities, need substantial ongoing support to obtain or retain paid employment (Commonwealth of Australia, 1987, Part 11, Div 1, 7.).

This explicitly positions those people captured by this definition as being unlikely to access competitive employment at or above award wages, and requiring substantial support to gain and maintain employment. As a result, this group were offered both employment and support via ‘supported employment services’ (later known as Australian Disability Enterprises, ADEs). Over the last several decades, research about employment for people with disability, including with need for additional supports, has provided evidence that this group can gain competitive employment and can be paid award wages, even when needing significant ongoing support. This evidence opens up a wide range of employment, as well as employment services and supports, to the cohort of people with disability previously ‘captured’ by this definition and dealt with via the provision of ADEs (that held the legislative responsibility to service this group).

The *Disability Services Act 1986* was replaced by the *Disability Services and Inclusion Act 2023*. This Act no longer differentiates between types of people with disability, nor does it provide a definition of ‘supported employment services’. Instead, a definition is provided of ‘employment services’

employment supports or services means the following:

(a) supports or services to assist a person with disability to prepare for, obtain or maintain paid work, including training;

(b) supports or services to assist a person with disability to gain and maintain self employment;

(c) the provision of incentives or supports to employers to employ people with disability (Commonwealth of Australia, 2023, Division 2 Definitions, 8).

Within the Discussion Paper (in Appendix 1) the definition of ‘Supported Employment’ provided is consistent with that provided by the Disability Royal Commission (Commonwealth of Australia, 2023b, p. 553):

Ongoing assistance provided by support workers and managers for employees working in supported employment services (historically known as Australian Disability Enterprises (ADEs)) or other settings to complete work tasks (p.17 Discussion Paper)

This definition makes ‘supported employment services’ synonymous with ADEs, which we argue here is unhelpful and will set back advances in ‘supported employment’ unless changed.

The definition used in the Discussion Paper is not the same definition as that provided elsewhere. For example, the DSS website defines supported employment without reference to setting or service (ADE) as:

Supported employment refers to jobs where people with disability with high support needs can receive extra support while they are at work
[\(<https://www.dss.gov.au/disability-employment-programs/supported-employment>\)](https://www.dss.gov.au/disability-employment-programs/supported-employment)

The Commonwealth Government’s response to the Disability Royal Commission defined supported employment as:

Supported employment refers to jobs where people with high employment support needs can receive extra support while they are at work (Commonwealth of Australia, 202, p.147).

This definition is also used in the *Commonwealth State and Territory Supported Employment Plan 2023*. This defines ‘supported employment’ as a **job situation** where extra support is provided. Supported employment as a type of job situation with supports provided for people with high needs can occur in any workforce or industry in Australia. However, using the term ‘supported employment’ to reference a job situation (i.e. one where the employer has agreed to enable the provision of ongoing supports) also risks confusion with **remuneration type** where a person is receiving a Supported Wage. Not all supported employment job situations will also be those where a Supported Wage is paid to the employee. Indeed, according to international definitions of supported employment, discussed below, the expectation of a supported employment approach is to achieve wage parity with non disabled employees.

In this context, we argue for a reconceptualization and redefinition of ‘supported employment’ and associated terms, as per the table we provide on p. 3 of this submission. This redefinition then makes possible a range of employment settings in which supported employment can occur (including social enterprise), a set of evidence-based practices that underpin these services, and a much wider ‘sector’ of service providers including employment services, social enterprises, ADEs, self-employment/micro business supports, among others.

Defining Supported Employment Practice

A further redefinition requirement is to clarify what a supported employment service does, that is, to define and describe 'Supported Employment Practice'.

This leads to the opportunity to align the terminology of 'Supported Employment' in Australia with the evidence, policy and practice base internationally. This is consistent with an 'employment first' approach cited in the Disability Royal Commission (Recommendation 7.29).

Internationally, the purpose of 'supported employment' is to 'support individuals with the most significant disabilities in achieving competitive employment outcomes in integrated work settings' (Wehman et al., 2018, p.133).

Implementation of supported employment involves four phases: (1) getting to know the job seeker, (2) job development and matching, (3) training and support, and (4) job retention services (Wehman et al. 2018, p. 133, citing Schall et al., 2015).

It is often aligned with a place-then-train approach as opposed to a train-then-place approach which requires work 'readiness' prior to placement. For people with high support needs, such as those with intellectual disability and psychosocial disability, there is evidence that they benefit from real work settings in which to learn and that they will not gain 'readiness' easily without this. This kind of definition of supported employment is further described by researchers in the UK:

Supported Employment is a distinctive model of fidelity-based employment support typically for workless individuals with health conditions and disabilities. Supported Employment services adopt a place-then-train approach of rapid job search and entry into paid work in the open labour market whilst simultaneously supporting health (and other) support needs. This contrasts with standard approaches that seek to first tackle barriers before next considering job search and entry (i.e. a train-then-place approach) and/or that consider either unpaid voluntary work or sheltered employment as successful outcomes (Whitworth et al., 2025, p.8).

Some jurisdictions have moved to align supported employment practice with a Quality Framework, such as the Supported Employment Quality Framework (SEQF) in the UK. The Supported Employment Quality Framework captures 5 stages of supported employment, as described by the British Association for Supported Employment (resonant with the earlier definition provided by Wehman et al. 2018 above):

1. Engagement

With a starting point of assuming everyone can work, supported employment proactively engages with individuals and communities to promote high aspirational careers for all. Supported Employment doesn't wait for people to come to them, instead they take Supported Employment to the people.

2. Vocational Profiling

This is a process of getting to know an individual well, by building a rich profile of everything that you need to know, in partnership with the person, to help match them to

the right career. The profile is strengths based, so is not only about finding a job someone is good at but a job where both the individual and employer can flourish.

3. Employer Engagement

Employers are valued as equal partners within the Supported Employment Model and their business requirements need to be at the heart of all conversations. Just as with individuals, supported employment proactively works with Employers to understand their workforce development needs and develop strong partnerships to embed inclusive recruitment into both early careers and workforce retention planning. Completing a Job analysis, you will build of a rich picture of their business needs.

4. Job Matching

Using the vocational profile and Job analysis supported employment matches the right person into the right role, based on the aspirations of the individual and the business needs of the employer. Supported Employment will look at every aspect of the match including workplace cultures to provide the best opportunity to meet all needs.

5. In-Work Support and Career Progression

Getting a job is the very beginning of everyone's journey and in work support focuses on providing a personalised support to enable individuals to learn and integrate into every aspect of their job and providing the support the employers need to feel Disability Confident in Action. This support will be over and above the reasonable adjustments needed and will help to address and overcome barriers throughout the lifecycle of an employee. Trained Job Coaches are the heartbeat of the Supported employment model and build the confidence and competence of the whole partnership. Career progression is an important part of the model, so people continue to flourish and grow. (British Association for Supported Employment [BASE], n.d., <https://www.base-uk.org/page/about-supported-employment>).

The SEQF model or Supported Employment model encompasses a set of evidence based practices that can sit within it. For example, Customised Employment is understood to be a sub-set of practice designed to support, particularly, people with intellectual disability. Again, there is an evidence base that identifies the types and quantum of support required to deliver Customised Employment (for example, Hall et al., 2022 provide an evidence-based model for 'Discovery', the first stage of Customised Employment).

These activities of providing supported employment are drawn from the international evidence base which posits that it is cost effective and attains positive employment outcomes (Wehman et al., 2018).

Thinking about the implementation of supported employment in this way, enables the alignment of different activities, services and organisational offerings with some or all of the stages of supported employment. In this way, there can be many actors in the provision of supported employment services or in the 'supported employment sector'. It is important to build clarity about the focus and evidence-based nature of the practice at each stage, to join

supports (and support providers) together, and to make visible the progress and choices along the path to integrated employment.

Further work is needed to better articulate the practices at each stage, the skill sets needed to implement them effectively and the policy, funding and program environments in which they can thrive, and to build the 'market' of supported employment service providers and their link to a clear revenue and funding model.

Which people with disability are the target of supported employment?

Unlike the Australian Disability Services Act 1986, the international literature does not tightly classify the target beneficiaries of a supported employment model. In general, it is targeted at those with 'significant' disability. One way of conceptualising this is to consider supported employment particularly suited to those where supports 'over and above the reasonable adjustments' (BASE, n.d.) are needed and where support provision (to both employer and individual) is likely to be ongoing, though allowing for fading at times or over time.

Reconceptualising ADEs

Within the context of the above discussion, ADEs are only one provider of supported employment services. To date, in Australia, ADEs have been caught in a narrow framing of definition and possibility and it is important to reconceptualise the role of ADEs. ADEs have evolved over time to reflect the changing 'problem' they are meant to be solving as identified by stakeholders, funders and policy makers. It is important to interrogate the multiple purposes they hold for stakeholders, which of these need to remain, and which need redesign.

ADEs as WISEs

First and foremost, the Disability Royal Commission viewed ADEs as workplaces – ones where people are paid subminimum wages (often based on poorly designed business/revenue models), may engage in meaningless work activities, and experience segregation. Further, in these workplaces, people may have few or no opportunities for career progression and no or few opportunities to transition to work with other (open) employers on either full or supported wages.

This kind of focus proposed the dominant direction of change or transformation for ADEs to be within a conceptualisation of ADEs as a form of social enterprise, and particularly Work Integration Social Enterprise (WISE). WISEs are 'social enterprises that create employment or pathways to employment for those experiencing barriers to work' (Joyce et al., 2022, p.1). WISEs focus on either or both the 'creation of intermediate (or transitional) and permanent employment opportunities' (Barraket et al., 2017, p. 354), that is, they may exist to create ongoing jobs for their target cohort (often referred to as 'destination' employers) and/or to support pathways into employment beyond the social enterprise (often referred to as 'transition'). This includes a wide diversity of work and work-generating arrangements, as well as business approaches including 'intermediate labour market businesses owned by charities or community organisations, employee-owned firms, social firms, Australian Disability Enterprises (DSEs)[3] and community recycling enterprises (CREs)' (Barraket et al., 2017, p. 354). In the context of ADEs, CSI has observed many strategies for employment generation

used by ADEs including: by employment within the enterprise’s business units (both facility-based and community or industry-located); employment in labour hire arrangements from the ADE into industry; employment in mini or micro businesses supported by the ADE and/or operated within the ADE; employment through supported transition to external employers, among others.

In some examinations of WISE, there is tension around the role of WISEs as ‘landing places for people who don’t want to transition’ leading to sometimes very long-term employment within the WISE, with the benefits of a strong sense of belonging, community and wellbeing (Sykes et al., 2024, p.7). This is consistent with some descriptions (and sometimes critiques) of ADEs. The need for long-term employment options within the WISE may be particularly important where the local labour market offers few opportunities for transition (such as in rural and remote areas). However, critiques such as the DRC’s highlight the risk of long-term ‘capture’ within a workplace considered to be a segregated one. ADEs have variously been addressing this critique over many years through approaches such as industry-based work crews or labour hire arrangements; community-based or community-facing business lines such as cafes; and deployment of a ‘mixed’ workforce through recruitment of workers without disability such as other marginalised groups or ‘surge’ workforces such as University students when needed. Some ADEs have initiated entirely new social enterprises targeting mixed workforces, where only a smaller proportion of the workforce will have a disability. These have been used as transition destinations for some (though often a small portion) of the ADE workforce.

One way of attempting to map the diversity of employment strategies within WISEs is through the concept of a continuum of WISE activities (i.e. within the arrow below) ranging across the supply and demand sides in the labour market, as described by Sykes et al., 2024, p.5).

Figure 1: From Sykes et al., 2024

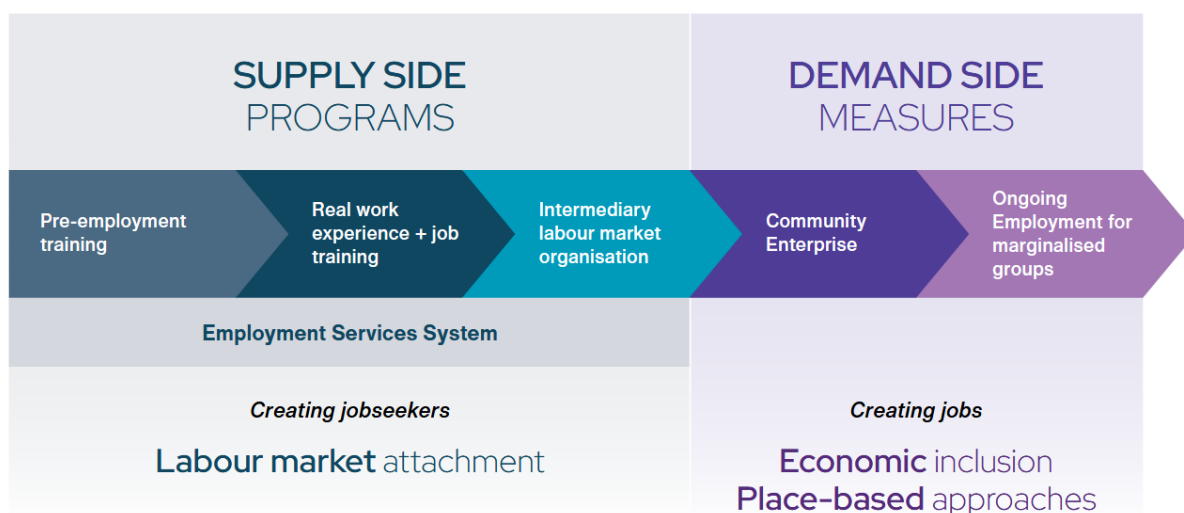


Figure 1. Positioning WISEs on the spectrum between supply-side programs and demand-side ALMP measures.

In this context (and using the terminology of the above figure), ADEs currently span this continuum, though all still offer ‘ongoing employment for marginalised groups’. Some are moving to more explicitly embed certified ‘pre-employment training’, and some are actively operating as labour market intermediaries (as part of their transitional employer role), acting as

a ‘talent provider’ or ‘talent pipeline’ to employers (see Crosbie and Wilson, 2023; Campbell et al., 2024), including via a range of workplace arrangements from labour hire, to organisation of unpaid work experience, to job placement and support.

WISEs also offer a wide array of activities that supplement their employment purpose. These can include training and skills development (both pre-employment and via work-based training, as discussed above), skills building in financial management (such as banking, saving etc.), social activities, other ‘wrap-around’ supports, and health and wellbeing related activities/approaches. WISEs are designed diversely to deliver on a wide range of social purposes or to attain a wide range of outcomes, including but going beyond employment. No two WISE are alike: WISE’s are highly diverse and have defied categorisation.

‘it is a highly complex form of “intervention”. The intervention has several interacting components; each WISE presents unique differences in the design and delivery of the intervention; development and delivery of the intervention needs to be sensitive to the local context and therefore cannot be standardized or externally manipulated; and there is inherent complexity in identifying the causal factors that link the intervention to outcomes’ (Lysaght et al., 2018, p. 67).

This diversity of WISE purpose and design is potentially helpful in reconceptualising ADEs as it enables a sophisticated analysis of the multiple social purposes of ADEs as WISEs, the outcomes they seek, and the interconnection between the intervention elements chosen. The important ‘takeaway’ is that ADEs, like WISEs, are diverse, have social-employment-commercial purposes, and therefore the trajectory of transformation is equally likely to be diverse.

ADEs as having non-employment social purposes

The dominant conceptualisation of ADEs as workplaces and enterprises, described above, obscures other purposes of ADEs. For many people employed in ADEs, ADEs offer much more than work and, indeed, not 100% of their time is spent in productive work activity¹. Without further data, it is difficult to fully explain what ADEs offer. However, it is clear that ADEs offer social connection and interaction, social activities both inside and outside of work hours, access to a range of other wrap-around supports, and a ‘safe place’ to spend their time². These are common to many other WISEs as well as to non-enterprise based social purpose initiatives. In the case of ADEs, these activities have been integrated alongside the employment focus of the initiative.

¹ While some ADEs may offer more formal non-work activities, in many instances, opportunities for the supported workforce to socialise, rest, or ‘help out’ on non-commercial activities are built into the way the ADE operates. In many, if not most, cases, for ease of administration, supported employees will be paid a supported wage for the entire time they engage in any activity within the ADE.

² Due to the way disability residential services are staffed, and the needs of family members and carers to themselves be employed, many people with high support needs require an alternative location than their residence to be in during the day. Both Day Services and ADEs fulfil this need by enabling a place to be throughout the day and across the week, or a central venue from which to come and go to other activities, where specialised support is available to meet personal and other needs.

This kind of exploration of ‘purpose’ opens up possibilities to re-think the multiple layers of purpose that ADEs are fulfilling and the different ways they, or other models that they might transform into (wholly or in part), might do this that likewise achieve the aspirations of the DRC for engagement in valued, integrated activities of choice.

For example, the notion of **ADEs as specialised activity ‘hubs’** might be applied instead. ‘Hubs’ might provide a stepping off and return point for activities (including employment-related ones such as paid work, unpaid work experience and training), alongside a range of wrap around supports. We note that Day Services and other disability services have been critiqued for providing a segregated activity focus and for supporting limited forms of community ‘tourism’ rather than meaningful inclusion in valued roles. This is an obvious critique that needs to be applied to this kind of reimagining of ADEs.

However, other individualised and community-focused models are available, such as ‘Clubhouses’ – an evidence-based model for people experiencing mental illness. Clubhouses are membership-based communities of people that support people with mental illness with daily living, socialisation, supported employment, education and housing. Rather than positioning the purpose as employment via a social enterprise model, ‘the Clubhouse employs a ‘work-ordered day’ approach (Beard et al., 1982), where members and staff work side-by-side on the tasks and roles needed to run the Clubhouse’ (Fjeldsoe et al., 2025, p.385). The Clubhouse also provides various elements akin to supported employment services including external job development, matching, and employment transition and support. As it is not an enterprise, the activities offered by the Clubhouse, including those of the ‘work-ordered day’ are unpaid. This focus on ‘work’ as an organising concept for activity is not dissimilar to ADEs, where people have chosen the ‘work-like’ environment of an ADE over the activities offered via a Day Service or in combination with these. In addition, both ADEs and Clubhouses have a strong focus on creating a supportive community within the organisation among both peers and support staff.

Another community-focused model is that of co-operatives. The Business Council of Co-operative and Mutuals (BCCM) has made its own submission to the Next Steps consultation. This submission highlights a range of current cooperative models, including worker cooperatives, that function in the supported employment sector. Some of these have started from ‘job clubs’ where the central premise has not been to create jobs via enterprise. In other instances, a ‘self-help’ and collaborative community mentality underpins the social enterprise approach that is used to create jobs for people with disability.

Stepping outside of an enterprise lens may open up possibilities for rethinking the needs that are being met currently by ADEs, and the different ways to meet them. Some ADEs may choose to evolve into a non-enterprise based organisation where the primary purpose is not creating paid jobs within the organisation. This kind of evolution has a wide range of trajectories, including new partnerships beyond disability services or the establishment of new organisations (such as Clubhouses). However, to achieve this, we need to open up the possibility for ADEs (or more importantly their communities) to reimagine what they could be and why, or alternately decide they no longer have a purpose and cease operation.

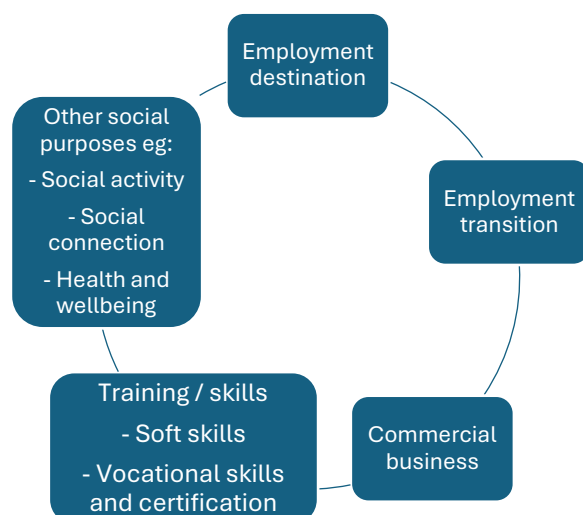
ADEs as supported employment service providers

Finally, some ADEs are currently acting as supported employment service providers, both to their own employees and/or to other ‘clients’ who access these services separately from employment within the ADE. For some this a transition model, where existing employees in the ADE are aided to identify, customise and sustain employment outside of the ADE. Some ADEs have a significant skill base in specific industry types and in making workplace adjustments within them. In the IncludeAbility pilot (Crosbie and Wilson, 2025), one ADE deployed these skills in working with a large employer to identify, then support, a substantial number of jobs for people with intellectual disability within the large employer in the retail sector. This provision of transition support is typical of transition model WISEs, and the ‘service’ of setting up and supporting this transition is a supported employment service. Other models in ADEs focus on offering a supported employment service (such as Customised Employment) where jobseekers are supported to identify, customise and sustain employment without first or ever being employees of the ADE. Similarly, some ADEs have offered or are developing supported employment services for school leavers and young people, which does not include employment within the ADE.

Possible dimension of purposeful redesign for ADEs

These dimensions of ADE purpose are not mutually exclusive and many are inter-dependent. Currently, ADEs all have a strong ‘work focus’ but, as the examples above demonstrate, there are many ways to hold a work orientation among a range of activities. The organisational design of the transformed ADE would need to match the purposes selected. Likewise the funding or revenue model can change proportionate to the purposes selected, noting that WISEs typically attempt to craft a mixed revenue base in order to fund these different and multiple purposes.

Figure 2: Possible purposes of redesigned ADEs



Conclusion

Overall, a substantial reconceptualization of ‘supported employment’ in policy and practice in Australia is necessary. This must go well beyond ADEs if it is to realise outcomes. There is an opportunity to lift the practice focus of a wide range of employment services to deliver

evidence-based supported employment, and to reinforce that supported employment can occur in any type of workplace or industry, not just in ADEs. A focus on supported employment as a practice model and on those who deliver it as supported employment services is the re-framing needed. This moves from a contained re-branding (of ADEs) to ecosystem change. We believe this clarity of conception and language is necessary for the sector and, most importantly, the people who rely on it who need to access the benefits of supported employment with sufficient geographic reach to create choice.

Alongside this is an opportunity to rethink the multiple purposes of ADEs and then redesign the organisational, activity and revenue models best suited to delivering these. For some ADEs, this will be the WISE model, but for others, divergent models may arise as more appropriate.

DETAILED RESPONSE – RESPONSE TO QUESTIONS

Major initiatives improving inclusive employment

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

1.1 Updating the guidelines for the Inclusive Employment Australia program (i.e. the new Disability Employment Service program) to ensure supported employment service delivery is included.

The table mentions the new Disability Employment Service model. However, the final guidelines for the new Inclusive Employment Australia (IEA) program are yet to be released along with the list of approved providers. The current RFT identifies that this program will not offer outcomes payment for those people who work less than 5 hours per week (and potentially may offer only partial outcomes payments between 5- 8 hours), nor provide Moderate Intellectual Disability payments for those working less than 15 hours per week. These two exclusions mean that IEA service providers will not provide ‘supported employment’ services to people who do not generate revenue under the program. Given a large proportion of people with high support needs will be working part time, and many can work only a small number of hours per week (at least initially), then these people will be left without Commonwealth government labour market supports, unless guidelines are changed.

1.2 NDIS employment-related funding

NDIS employment-related funding is largely missing from the Appendix with the exception of School Leaver Employment Supports (now removed as a funding category of NDIS and replaced by Employment Assistance). Overall there is an inadequate focus on the design of the NDIS employment-related funding and a lack of attention to the evidence base to inform this design and linking of this to suitable pricing models and plan guidance. The NDIS employment-related funding is a major lever for the delivery of supported employment (in its fullest form as understood by CSI authors). This is a major source of revenue for potential and actual Supported Employment Service providers but the NDIS has failed to design the funding and pricing to support the range (and dosage) of supported employment activities required. Recent CSI Swinburne research established the costs of delivering supported employment as part of the Down Syndrome Australia Employment Connections Service (ILC funded) and matched this to potential revenue from both the NDIS and the IEA. The study (available shortly) found multiple barriers to utilising NDIS funding including costs of being a registered NDIS provider, ineligibility for the Capacity Building Employment-related Assessment and Counselling line item (due to restrictions on staff qualifications) and an insufficient funding allocation per person. While the NDIS employment-related funding (as well as other non-employment line items relevant to support employment) is potentially a major Commonwealth contribution to supported employment, it is not well designed for this purpose and currently functioning well-below par (for example, with only an average 37% plan utilisation rate for Capacity Building Employment Finding and Keeping a Job funding, [NDIA, n.d.] discussed below at 2.2).

1.3 Information, Linkages and Capacity Building (ILC) funding

ILC funding is not mentioned in the Appendix 3. Past ILC funding has had a strong focus on economic participation initiatives (with upwards of 50 projects funded), and in addition the Building Employer Confidence program has also contributed. While a new ILC granting strategy has been announced, some current 'Economic Participation' and 'Social and Economic Participation' grantees have received grant extensions till June 2026. This is an important set of initiatives that have been meeting supported employment needs, with many operational for three-plus years. There has been virtually no attention paid to what can be learned from these initiatives nor the impact of their cessation in June 2026. Economic participation has now been removed from future ILC guidelines which will leave a substantial policy and funding gap for new and continued initiatives in this space. Two examples of funding recipients in this category are:

1. Down Syndrome Australia Employment Connections Service – this service has been evaluated by CSI Swinburne. Over three years, it has built a service in multiple States and Territories, consistent with the international supported employment evidence-base, and attained employment outcomes at full award wages for 89 people with Down syndrome. ILC funding will cease 30 June 2026.
2. The WISE-Ability (Connecting pathways to employment with the Work Integration Social Enterprise model) project – this model has been developed by CSI Swinburne and has worked directly with twelve ADE's to foster transformation and enhancement of pathways to open employment. The model was referenced within Structural Adjustment Fund guidelines and multiple applicants sought funding to implement it. The model includes a training package and guidance and is ready for national roll-out. ILC funding will cease 30 June 2026.

Increasing inclusive employment – Recommendation 7.30

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

There is very little data about the desired future state of the supported employment sector from the perspective of people with disability with high support needs in Australia. There are some small studies of small clusters of individuals (such as [Crosbie, 2023](#) who reported the views of a small number of young people with intellectual disability). As part of its WISE-Ability project, CSI Swinburne researchers have interviewed a small number of ADE employees or those who have transitioned to open employment. These interviewees have described what they value in employment (both within and outside the ADE), namely support, connection, variety, and purpose. Presently, many people consider these features are more commonly experienced in social enterprise type employment (including ADEs) although we have interview data of people that have had positive experiences in open employment. In addition, CSI Swinburne is currently interviewing a small number of employees with disability in ADEs in regard to their vision for ADE transformation and what they value or not in ADE jobs (as part of the evaluation of White Box Enterprise's Evolve project). This data has not been finalised but early data highlights the diversity of reasons people come to work in ADEs, including acquired injury. In one instance,

while the individual aspires to return to open employment one day, currently the ADE offers a supportive environment approved by his specialist health provider where he can re-acquire work skills and that is supportive of fluctuating capacity dependant on health status. This person described the ADE as ‘a comfortable place because you're happy working’. Another interviewee with intellectual disability described his favourite job as ‘litter-picking’ because it is ‘active’ (i.e. walking), is in nature (which he particularly loves), involves ‘learning’ (which is ‘good fun’) and is ‘social’ with a mix of supported employees and skills trainer in his work crew. He described what he liked about the ADE as: ‘I like the work and the people and everything’. Despite knowing he can ask to be supported to move to open employment, this person liked the familiarity and comfort of the ADE job. These few pieces of data obviously represent only two perspectives among thousands.

There is an urgent need to get clarity on what employment looks like for people with high support needs, such as significant intellectual disability, in modern day Australia who are no longer in ‘institutionalised residential settings’ by default. It is important to understand: where do they want to work?; what conditions are they seeking?; how can any desired security, safety, routine and structure be provided to them and to their supporters?; what sort of work is available?; how could the work be organised?; how does the work fit within a blended week of structured activities (given evidence suggests most people will work part time)?

As we don’t have a solid evidence base about the views of people with high support needs, we have synthesised our learnings from the research below into a set of key elements that reflect sector needs. For employment outcomes to be achieved for people with disability with high employment support needs, a number of things are needed:

1. Clear definition of supported employment (as discussed above) and consistent use of the terminology
2. The recognition and active fostering of a diverse sector of supported employment service providers who foster and sustain supported employment in diverse settings, sectors, industries and geographies
3. An enabling ecosystem for the delivery of supported employment services. This includes:
 - Adequate financial models underpinning the effective delivery of supported employment service providers
 - Policy and legislative environment
 - Practice guidance and support
 - A focus on employer readiness and enablement (see 3.3 below).

Some of these are discussed further below.

2.1 The recognition and active fostering of a diverse sector of supported employment service providers who foster and sustain supported employment in diverse settings, sectors, industries and geographies

As discussed above, a reframing of the definition of supported employment requires a reframing of the notion of the ‘supported employment sector’ as:

The range of providers of initiatives, supports and services that foster and sustain supported employment jobs in diverse settings. This includes jobs-focused social enterprises/work integration social enterprises (WISE), employment service providers who work with those needing supported employment, Australian Disability Enterprises, disability employment initiatives and programs (often run by not-for-profit organisations), self employment and micro business support services, and intermediaries supporting the sector (from p.3 above)

In this context, the supported employment sector includes any service/initiative provider of activities that foster and sustain employment of people with high support needs in diverse settings, sectors, industries and geographies, rather than pre-identified organisation or service types.

With this definition in mind, there is the need to recognise and actively foster this diverse sector of supported employment service providers. Within the NDIS context, there is a need for the active and purposeful development of a sustainable market of current and potential supported employment service providers. Overall, there is a need to bring supported employment service providers into the employment services ecosystem in a way they are not presently. Similar thinking has been identified following a recent review of policy in relation to WISE, which recommended:

‘Reducing or eliminating barriers to entry for WISE into the employment services system and outcome payments for supporting participants in employment services’ (Khan and Barraket, 2024, p. 6).

However, it should be noted that there is concern in the social enterprise sector that activating such a strategy requires careful design so as to avoid simply turning WISEs into replicas of the existing employment services system (with the same flaws) ‘but just a different label’ (Sykes et al., 2024, p.6). WISEs are valuable for their diversity and ability for innovative and localised response, which may be put at risk via compliance requirements within large active labour market programs.

2.2 Adequate financial models for the delivery of supported employment

As discussed above, there are a range of providers of supported employment services, or services offering parts of this model. These include:

1. WISEs including:
 - a. ADEs, noting that not all ADEs offer all elements of the supported employment model
 - b. Social enterprises targeting people with disability with high employment support needs. Again, not all offer all or any elements of the supported employment model.
2. Not for profit organisations offering employment initiatives
 - a. For example, Down Syndrome Australia Employment Connections Service. A range of ILC and other funded initiatives have been created with limited term funding so may not have longevity despite positive outcomes.
3. Inclusive Employment Australia providers (tbc)
4. NDIS providers

5. Others.

Each of these provider types has its own complexities in the delivery of supported employment and utilise complex revenue and funding models to survive.

In respect to NDIS providers, NDIA data (NDIS Data, <https://dataresearch.ndis.gov.au/explore-data>) suggests that there is a 37% under utilisation rate of allocated participant funding for Capacity Building- Finding and Keeping a Job, with approximately 124 active providers for 29,492 NDIS participants with this funding in Q1 2024/25.

Table 2: NDIS Finding and Keeping a Job Funding and Providers

Type of disability	No. with Capacity Building (all categories) funds	No. with Capacity Building - Employment funds	Average committed support \$ for 6 months	Average total payments made for 6 months	% utilisation	Number of active providers in this category in 6 months - Australia wide	Number of participants per provider (in 6 months)	Number of active providers in this category in 6 months - by location
Down syndrome	11598	635	\$7,605	\$4,139	54%	0	0	
Intellectual disability		7882	\$6,872	\$2,620	38%	49	161	
Autism		15125	\$7,051	\$2,601	37%	51	297	
Psychosocial		2276	\$2,482	\$532	21%	24	95	
All disability (total), Aust wide		29,492	\$6,370	\$2,336	37%	124	238	
Indigenous		2683	\$6,821	\$1,862	27%			
CALD		1981	\$5,550	\$2,541	46%			
Age 15-18 yrs			\$7,919	\$2,845	36%	7	0	
Age 19-24 yrs			\$8,032	\$3,073	38%	50	317	
Age 25-34 yrs			\$2,564	\$778	30%	43	93	
Age 35-44 yrs			\$2,153	\$622	29%	24	84	
Age 45-54yrs			\$1,978	\$470	24%	11	0	
Major cities		20,026	\$6,206	\$2,385	38%			77
Population >50,000		3,233	\$6,886	\$2,371	34%			19
Population 15,000-50,000		2,596	\$6,546	\$2,317	32%			9
Population 5,000-15,000		1,225	\$6,440	\$2,103	33%			<5
Population less than 5000		1,882	\$6,733	\$2,149	32%			13

While the above data has some flaws, it suggests that some cohorts such as Down Syndrome do not have any active providers in this period. This cohort needs individualised and ongoing support, yet the plan utilisation data suggests they cannot purchase it. Overall, there is a clear market gap across all cohorts, if not failure, in the delivery of NDIS funded employment services.

One identified barrier to service providers in relation to utilising this line item is the requirement for personnel delivering services under 'Employment-related assessment and counselling' to hold allied health or vocational rehabilitation qualifications. This does not align well with the international supported employment evidence, where some types and models of supported employment (including the SEQF, Customised Employment, and Individual Placement and Support) have fidelity scales with accompanying training, credentialling and constant invigilation. However, currently, supported employment service providers cannot provide services under this line item unless their staff meet a narrow band of qualification, regardless of their training in other fidelity-based methods.

Data in relation to social enterprises highlights difficulties in operating an enterprise with the hybrid logics of commercial sustainability and social purpose. Social enterprises draw on diverse funding and revenue streams, including revenue from trade, from grants and donations, and from other sources. The recent *RISE* report by Social Traders (Earles et al., 2024) reports on a small sub sample of social enterprises in Australia (i.e. 4838 enterprises of a potential 12-20,000 social enterprises in Australia, dependent on estimate source). Of these, around 66% generate 80% or more of their revenue via trade. This is consistent with earlier data which highlights that, in addition to trade, around 13% of revenue is from government grants and 8% from philanthropy (Castellas, 2017). On the whole, social enterprises in Australia are financially viable, though around 32% operated with a new deficit in the prior financial year (Earles et al., 2024, p.10). While the largest proportion of social enterprises focus on providing jobs for marginalised groups, and a focus on people with disability within these is common, it is not clear how many have specifically targeted those with high support needs. It is important to further understand the viability of social enterprises as supported employment providers for people with high support needs and whether they have been able to tap into revenue such as NDIS or via Disability Employment Service providers. Anecdotal data suggests that this remains elusive and where enterprises have accessed this funding, it has not been sufficient to cover costs. There is a need for funded research in this area.

2.3 Funding and investment design that joins up parts of the system required to deliver supported employment so that jobseekers and supported employees can utilise complementary funding and supports to deliver the type and quantum of supported employment services to suit their needs and those of their employers.

To date, people with high support needs have largely been supported in terms of employment in a separate system (via ADEs) and more recently within the NDIS (again largely via ADEs), subject to them having identified employment goals, allocated funding and a service provider to purchase employment services from. In the redesign of Disability Employment Services, the service system has expanded to include people with an assessed work capacity of 0-8 hours per week. This now potentially brings all people with disability, regardless of the amount of

hours of work they can complete per week or the level of their support needs, into the IEA program. For this to be successful, the funding available needs to adequately remunerate this, and services need to offer suitable types of activities.

People with high support needs are likely to be NDIS participants and, if employment is a goal, likely to have some employment-related funding. Those currently working in ADEs will have Core ‘Supports in Employment’ funding but may not have Capacity building funding.

It is unclear how NDIS and IEA funding and service provision will work together, or if they can. There is a degree of potential overlap between funding categories even within the NDIS and little guidance as to how these align to the evidence-based activities of supported employment service delivery as discussed above (e.g. vocational profiling/client assessment, job matching, employer engagement, in-work support and career progression). The below table identifies the activities identified within each of the three NDIS employment-related funding categories. On face value, these activities are likely to also have a high level of resonance with the activities expected of IEA providers.

Table 3: Comparison of NDIS line items related to employment

Core- Supports in Employment (NDIA, 2024, p. 63).	Capacity building – Employment assistance (NDIA, 2024, p. 76)	Capacity building – Employment related assessment and counselling (NDS, 2024, p. 10).
• on the job assessments related to the impact of a person’s disability on their ability to work;	• explore what work means (discovery) • develop a career plan	• A functional assessment • A vocational assessment
• job customisation;	• implement specialised job customisation/job carving	
• on-the-job training and intermittent support with daily work tasks;	• build essential foundation skills for work	• Education and support for the participant, the employer and others in the workplace
• direct supervision and/or group-based support to enable meaningful participation at work;		
• physical assistance and personal care delivered in the workplace;		
• supports to manage disability-related behaviour or complex needs at work;	• manage complex barriers to obtaining and sustaining employment	• Counselling when a participant’s disability prevents return to their previous occupation, or they have not previously engaged in employment
• non face-to-face activities that are directly related to supporting a		

participant's employment.		
	• supplement work experience available through the school system • obtain part time work whilst finishing secondary education • transition from school into further education or training • obtain alternative employment following onset or exacerbation of disability • assist a person to change jobs • obtain employment on completion of a qualification • transition from a supported employment service (previously known as an Australian Disability Enterprise (ADE)) to open employment • successfully engage with a Disability Employment Service (DES) provider or other employment service to secure employment and arrange ongoing support on the job if necessary.	

NDIS service provision is dependent on the level and type of funding allocated with notable barriers to accessing employment funding and in changing it to meet new goals or requirements (Campbell et al., 2024). This means that not all people with high support needs will have sufficient funds to purchase supported employment services via NDIS service providers, or to purchase a full range or sufficiency of services, even if a NDIS market of service providers existed. Similarly, people with high support needs accessing supported employment services through IEA providers may find that only some parts of an evidence-based supported employment model are offered by IEA providers, leaving gaps in service provision required to meet their needs. Additionally, they may not receive an adequate quantum of support for their higher support needs. Finally, bespoke service providers (such as social enterprise or not-for-profit initiatives) may be offering services and activities using other kinds of funding and are unable to access either NDIS nor IEA funding. However, in order to be sustainable they will need a revenue source that has some longevity.

In order to meet an individual's needs, it is likely that services delivered via these different revenue streams will need to be carefully braided together, to achieve maximum complementarity, rather than duplication, and to fill gaps in service provision. This is likely to be particularly important for supported employment, given the complexity of the service activities and the ongoing nature of support. At present there is no guidance about this, nor the use of any clear models to describe service activities and compare them (such as the international supported employment models provided here). There is an urgent need for guidance about the complementarity of NDIS and IEA funding and services, with particular attention to making visible which evidence-based activities of supported employment service are being delivered at which point, by which provider, funded by which funding source. It is also likely that attention will need to be paid as to how to equip participants/jobseekers and service providers to navigate and access these multiple funding sources, ensuring this occurs in a timely way. Given that people with high support needs are the most marginalised from employment, a policy imperative should be to create ease of immediate access even at the risk of duplication.

2.4 Policy design that equally values different types and levels of employment without disqualifying people who can only work a small amount of hours per week.

People with high support needs are likely to work part time (though some will work full time). For some, their aspiration is to work one or two 'shifts' per week, perhaps totalling less than 5 hours per week. In the Down Syndrome Association Employment Connections Service project, for those attaining employment their weekly hours of work ranged from 2-12 (32% were under 5 hours per week) and averaged 6.54 hours per week. The experience of the Nundah Community Enterprise Cooperative, creating work for people with cognitive and psychosocial disability, is that work hours range from 6-15 hours per week:

To create a safe, unpressured work environment where people can rediscover their capacities and confidence requires short work days. Previous experiences of moving from no work to being thrust into full time work have taxed people beyond their limits (Hooper and Warner, 2013, p. 14).

In addition, the WISE-Ability project (Campbell et al., 2024) has shown that many ADE employees transitioning to open employment seek to also maintain employment in the ADE, entering a hybrid employment pattern.

Low-hour per week jobs have not been eligible for outcomes payments inside Disability Employment Services, nor is it clear that they will be sufficiently rewarded in the new IEA program, including no outcomes payment for jobs less than 5 hours per week. This fundamentally values jobs by total work hours, and invalidates those (and efforts to find and maintain them) that fall below a certain threshold. This is potentially a form of structural discrimination.

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

3.1 Redesign of the Inclusive Employment Australia program

As described above, the current design of the Inclusive Employment Australia program appears to be heavily weighted to employment outcomes for jobs of 15 hours per week or more, and

even disincentivise support for people who can only work less than 5 hours per week (as there appears to be no outcomes payment for this cohort). The program needs to be assessed in relation to its capacity to both incentivise and adequately remunerate the delivery of supported employment to people with high support needs.

People with high support needs are likely to work part time in open employment, and also very likely to work only a small number of hours per week. The NDIS data (NDIA, 2022) suggests that of NDIS participants who work in open employment, 29% work less than 8 hours per week and 31% work 8-15 hours per week. In this context, the IEA needs to be designed to meet the needs of people who work part time, including low hours per week.

A recent analysis of the Down Syndrome Australia Employment Connections Service (Wilson et al., 2025) found that it costs \$29,183 (in metropolitan areas) or \$38,365 (in regional and rural areas) per person per outcome for the first year of delivery (in which job placement is attained), using an evidence-based model of supported employment (described above). However, if people working less than five hours per week are not eligible for outcomes payment in the IEA program, then 32% of the outcomes in this program are ineligible despite incurring the cost of \$29,183 to deliver over 12 months. Additionally, 100% of jobs attained were for less than 15 hours per week, so the Moderate Intellectual Disability payment would also not be available to the service provider, despite working with people with significant intellectual disability. This analysis shows the current IEA design is unlikely to be able to support delivery of supported employment for people with high support needs.

Overall, this analysis highlights the poor fit between standard rationales of Active Labour Market programs in Australia, i.e. encouraging jobseekers into employment so as to reduce income support payments, and the needs of people with high support needs. For people who will only work low hours per week, there is unlikely to be income support reduction. Yet there will be costs incurred in delivering supported employment services to this group, even for low hours of open employment (as shown above), even if these costs can be reduced over time as the services shifts to ongoing support post placement. This requires a shift in rationale for policy makers to acknowledge the broader financial and social benefits that accrue when people are employed, beyond reduction of income support.

3.2 Development of the employment services ‘market’ of NDIS providers

As described above, there is not an adequate market of NDIS supported employment service providers. Market stewardship and further funding design is needed in order to attain an adequate and equitable supply of providers across Australia, relevant to diverse cohorts of people with high support needs.

3.3 Significant employer capability building

Despite decades of employer-facing initiatives such as Job Access, the National Disability Recruitment Coordinator (both Commonwealth government funded), the Australian Disability Network and others, there has been little embedding of capacity to employ people with disability within employing organisations, and little attention to people with high support needs. The recent pilot targeting people with intellectual disability and high support needs within the Australian Human Rights Commission’s IncludeAbility project (Crosbie and Wilson, 2023),

found that a large employer could be supported to employ people with high support needs on award wages, but that substantial support was required to be provided to the employer by multiple intermediaries at multiple levels of the organisation and in an ongoing way. Within this initiative, it was found that large employers belong to numerous support intermediaries such as Diversity Council of Australia and Australian Disability Network, and have participated in numerous disability employment pilots, yet there appears to be little ongoing learning and change. This suggests that more pilots are not needed, but what is needed is a better understanding of why knowledge, confidence, changes to recruitment practices and policies, upgrades of facilities, have not resulted in embedded uplift and outcomes. Further targeted research and testing is required to ascertain how to make long term, embedded change in employer capability to employ people with disability.

Beyond this, further work is needed to understand how to support employers to employ people with high support needs. A recent study undertaken by CSI Swinburne with the NSW Department of Communities and Justice sought to design an approach to increasing the employment of people with intellectual disability in the NSW public service (Macali et al., 2025). Substantial barriers were identified including the loss of entry-level jobs, recruitment practices, poor work environments and stigma. The study identified that though it may be difficult to activate job opportunities for people with intellectual disability at scale on a permanent basis, a key role the government could play was to enable the acquisition of paid work experience and the opportunity for a 'first job' of shorter duration through the use of a targeted paid internship scheme for people with intellectual disability. An additional strategy was the creation of bespoke 'lived experience' expert jobs in identified parts of the organisation. There is a need for further investment to build models that can scale employer capability building and job identification and creation such as this.

Finally, there is a need to support the development of high quality employer engagement and capability building resources. At present, supported employment providers, such as ADEs, social enterprises and not-for-profit initiatives, are each designing and delivering their own training to open employers. While the evidence shows that developing a trusted relationship with the employer is essential, it is not efficient for organisations to be generating similar resources and training of varying quality. It is hoped that supporting the development of high quality resources in this space will be undertaken by the Centre for Inclusive Employment.

3.4 Establishment of relevant talent pipelines

In every evaluation of disability employment initiatives conducted by CSI Swinburne, the issue of lack of access to clear talent pipelines for employers is identified. Even when employers are keen to employ people with disability, they lack a clear mechanism to access suitable job matches, despite the presence of Disability Employment Services. In these evaluated programs, employers and employment service initiatives have connected with a more targeted set of talent providers such as ADEs (particularly those who have a workforce aligned with the employer's needs), education providers, and social enterprises. The use of talent pipelines where the talent provider has a deep knowledge of the job candidate and their conditions for success, and where the job candidate has relevant training and work history has been found to be particularly fruitful.

On the other side of the supply/demand continuum, ADEs and social enterprises are seeking mechanisms to support the development of relationships between themselves, as talent providers, and potential employers. Currently much of the transition of ADE employees to open employment is organised in a bespoke manner for each individual. In some cases, a 'bulk' supply of talent has been able to be negotiated. There is a need to look for ways to uplift these efforts with some connective infrastructure or platform provided as bespoke models are not able to be scaled.

3.5 Changes to vocational education and training

Vocational education and training has largely failed people with high support needs. TAFE programs are largely not inclusive beyond the Certificate I and II in Work Education and General Education programs, that are often offered in segregated classrooms in TAFE. Few ADEs or WISEs are Registered Training Organisations, and to offer accredited training in the workplace or to support workplace activities, they must partner with a RTO. In the absence of this, ADEs and WISEs develop and offer their own workplace training as an alternative to TAFE programs that are not fit for purpose for their cohorts. In the main, there is a lack of certification of the skills acquired by people with high support needs in ADE and other environments.

This lack of certification also relates to a lack of ability to carve out micro-credentials when not all competencies are able to be met by the person with disability. Sometimes this lack of attainment is due to a failure to provide adequate reasonable accommodations within the training environment, and sometimes it relates to an inherent workplace requirement, such as ability to administer CPR, being inserted into training competencies. In some cases, the nature of the person's impairment means they cannot complete these competencies. In these instances, carving out micro-credentials, or smaller sequences of competencies, and certifying these, would be beneficial to formalise documentation of skills and knowledge attainment.

Overall, in order to raise the skills certification levels of people with high support needs, a greater focus on offering an inclusive VET system (well beyond the small number of courses regularly offered to people with disability) is needed. This needs indepth investigation to better understand the barriers and potential design of solutions.

3.6 Changes to the Disability Support Pension

New evidence from Deloitte Access Economics (2025) highlights the need for changes to the Disability Support Pension (DSP). The Disability Royal Commission has identified the way the DSP functions to disincentivise employment for people with disability, including a fear of decreased income and loss of income support entitlement and its associated benefits. Data in the Deloitte Access Economics report evidences the effects of this.

The research undertaken by Deloitte Access Economics, in consultation with Disability Representative Organisations and disability employment peak bodies, highlights three major barriers built into the DSP:

1. High financial disincentives: Many DSP recipients face effective marginal tax rates of over 50 percent, meaning that for every additional dollar earned, they lose more than half in reduced payments. This makes low-paid or part-time work financially unrewarding.

2. Fear of losing eligibility: Under current rules, if a person works above the allowable thresholds for more than two years, they lose access to DSP. If they later fall out of work—for example, due to fluctuating health or employer inflexibility—they must reapply from scratch. The risk of losing the safety net discourages even small increases in work hours.
3. Complex administration and reporting: The burden of fortnightly income reporting, inconsistent treatment of earnings, and fear of making mistakes can lead people to avoid employment altogether.

These disincentives and risks are particularly relevant to people in supported employment who are considering new forms of work—whether through social enterprises, inclusive employment settings, or customised jobs.

The Deloitte modelling recommends two practical changes to DSP rules:

1. Reduce the taper rate applied to income earned above the free area of \$212 per fortnight—from the current 50 cents in the dollar to 30 cents. This would reduce the financial penalty that DSP recipients face when they take on work or increase their hours.
2. Extend the DSP suspension period from two years to ten years, allowing people to stay attached to the safety net while they build confidence in open employment. Importantly, these measures would mean an individual would benefit from 10 years of eligibility to the non-financial benefits associated with DSP, such as Health Care Card benefits – providing extra safety and financial support while they engage in work.

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?

4.1 Changing the definition of supported employment sector.

As argued above, it is critical to change the definition of ‘supported employment sector’ from one that is limited to a focus on ADEs to one that encompasses the wide range of initiatives and organisations that operate, or could operate, to support the employment of people with high support needs in a range of employment settings.

4.2 A reconceptualization of Australian Disability Enterprises

As argued above, there is a need to broaden the conceptualisation of ADEs in order to better evaluate direction for change. This kind of reconceptualization would need to be accompanied by a planned and resourced approach to fostering change across the sector.

While there have been a range of initiatives to support change in the ADE sector (for example, two rounds of Structural Adjustment Funds – Commonwealth funded, and philanthropic investment such as the ‘Evolve’ project implemented by White Box Enterprises), there has been little real investment in building a deep understanding of the dimensions of change and the supports or actions required to achieve them.

There is an urgent need to pull together the multiple examples of change across the sector and deeply investigate the approaches used, the barriers and enablers to change, and the lessons

learned about what can and can't be achieved and the limits of attainment (e.g. where the ceilings are in different types of change). For example, CSI Swinburne's ongoing evaluation of the 'Evolve' program highlights that ADEs struggle with both implementing change whilst maintaining 'business as usual'. From a commercial perspective, they are attempting to rethink and redesign aspects of their commerciality whilst keeping their existing business lines operational as they maintain stability of employment for supported employees (i.e. to meet their social purpose). In another context, some ADEs have significantly committed to starting new social enterprises where the workforce may include only 30-40% of people with disability, with all employees paid full award wages. Anecdotally, these organisations report that the cost of investing in new social enterprises necessarily places a ceiling on the amount of transformation they can achieve, and it is not possible to transition all supported employees to these new arrangements or to open employment. This leaves a 'legacy' workforce and ADE model that still requires further investment in order to also make changes here. Finally, ADEs report that 'shedding' of some supported employees, who require substantial support beyond what the enterprise can afford or accommodate, does occur from time to time, and may be further increased by transformation activities.

This snapshot of transformation activity is incomplete but highlights the complexity of transformation, its processes and outcomes. Additionally, a substantial literature documents the complexity of successful social enterprises given the need to manage the commercial and social purposes of the entity, and the additional 'impact' costs of adding social purpose to a commercial model. In this context, it is critical that we learn about *how to do transformation of ADEs*, and how best to support them. Otherwise future investment or policy imperatives will occur without guidance and evidence.

Raise subminimum wages – Recommendation 7.31

5. How could the sector best increase wages for people with disability while avoiding job losses? a. Are there examples that currently exist that can be leveraged? b. Are there new approaches that could be tested?

While current discourse among funders focuses attention on the need to increase the commercial viability of WISEs (so as to increase their capacity to pay full award wages), there are significant and foundational difficulties in this approach. In addition, we suggest that a range of other strategies could be tested/adopted.

5.1 A strong focus on productivity uplift for employees on supported wage

There is no publicly available data on the productivity assessments of employees on Supported Wage, either within ADEs or in open employment. This means there is no way to track whether productivity is increasing over time (as employees should be re-assessed regularly). There is a need to support employers (ADEs and open employers) to gain expert advice about ways to increase productivity by redesigning the job, job carving and customisation, and changes in the workplace, including the use of technology to support productivity. Further research is needed to provide guidance to the sector on technology solutions, investment, and returns.

Anecdotally, there is evidence that some existing support and supervisory staff in ADEs are not skilled or motivated to support increases in productivity (given this has not been a focus of their roles historically and many are long-term employees). Given the longevity of ADEs, this 'legacy' workforce is a unique feature not often found in WISEs. There is a need to support ADEs in the re-training of their workforce so that the support staff are capable of and motivated to seek ways to support the increased productivity of supported employees (linked to reassessment and higher wages).

Increasing employee productivity should be a primary focus for Commonwealth funding (and should have been a strong focus of the Structural Adjustment Funding), given it has clear benefits to employees and the enterprise alike. This is also an important pre-requisite for transition to open employment, where the employer expectations of employee productivity and performance need to be met.

However, there is almost no information or evidence from those using supported wage (including open employers) as to whether this has been a targeted focus, the strategies used and the results. There is a clear opportunity to rectify this, and to build and share evidence of technological and other solutions that can uplift productivity. If we uplift productivity, people on supported wages will receive increased wages.

5.2 Investment in pathways to employment/ full award wages

There is a need for intentional development of and investment in pathways that lead to high wages. This includes via designing and supporting activities such as work experience, internships, labour hire and other arrangements that increase on-the-job skills and confidence and demonstrate work experience. In addition, an increased focus on more formalised skills acquisition and certification is a mechanism to acquire and validate skills linked to increased wages. Explicit attention to these elements and the conscious design and funding of pathways is a key mechanism to open opportunities for wages advancement. Opportunities for reassessment of productivity need to be aligned to such strategies and skills acquisition.

5.3 Training wage arrangements

With the dominant use of Supported Wage in ADEs, there appears to have been little use of training wages. A more explicit focus on a structured training wage, (in both ADEs and open employment), that applied to employees who are formally engaged in skills development (including in-situ training and workplace assessment processes), could offer a clear explanation for and parameters to a reduced wage for a period of time, in recognition of lower productivity while skills are built.

5.4 Reconceptualise ADEs to better delineate paid work activities from non paid activities

As discussed above, it is possible to reconceptualise ADEs to better identify their purpose and aligned activities. In this reconceptualization it is likely that not all ADEs or not all ADE activities will be wage-related. Recognising the multiple, mutually supportive activity streams of ADEs, will enable differentiated consideration of employment, unpaid work experience, training, supported 'down time' or rest time, social inclusion/social support, and recreation activities. This enables a clearer delineation of work hours from non-work hours and the more explicit

linking of wage payment to work hours. As with the Clubhouse model, while a ‘work-ordered day’ may be a retained focus, this does not have to equate with wages payment for all activities.

5.5 Innovative funding models that address impact costs

There is growing evidence that social enterprises struggle to operate at a level of commercial viability due to the high ‘impact costs’ they incur (Pullen et al., 2023). These include costs related to employing people whose productivity has to be built via training and experience, along with the costs of providing a range of other supports and facilities relevant to the social purpose. As described by one sector representative:

‘you’re competing with other commercial businesses but by definition you’re not employing the most productive person, you’re actually employing the person who needs a job the most’ (interviewee from Sykes et al., 2024, p.8).

There is limited potential to adapt the business focus of the WISE to accommodate these impact costs. One strategy has been to try and select business lines that can produce sufficient revenue even with reliance on a ‘low’ productivity workforce (for example, laundries). However, this limits the range of industry types and work roles available for ADEs which in turn limits the employment opportunities provided people with high support needs.

What is required are funding mechanisms that recognise and fund impact costs. The Work Foundations grant (DEWR) appeared to offer a mechanism to do this in relation to one type of impact cost, i.e. ‘wrap around’ support costs, but explicitly excluded initiatives and social enterprises targeting people with disability.

Ending segregated employment – Recommendation 7.32

6. Do you see a role for workplaces which provide specialised employment opportunities for people with disability in the future? If so, what should these workplaces look like?

6.1 General comment

In general, there is a dearth of open employment settings providing suitable employment opportunities for people with high support needs. Until this changes, there will be a need for specialised employment opportunities developed in a range of workplaces.

‘Specialised workplaces’, such as those offered by WISEs, have proven valuable and necessary for different cohorts of people marginalised from the workplace. These include those providing the supports needed by targeted employees including wrap-around supports, specialised disability-related supports (for example behavioural responses and settings), higher levels of in-situ or intensive jobsite training support or supervision, among others.

The DRC has criticised many of these settings as segregated. However, it is important to note that, in general, there is substantial evidence that beneficiary employees of WISEs (and ADEs) value the community of peers they work with. Similarly, models like Clubhouse, have been built around intentional communities of peers and have been found therefore to offer highly relevant supports. An important element raised by the DRC in this context was that of choice when considering whether such settings could be considered segregated. Other important elements are the level of integration within and via the setting. There has been some discussion among

beneficiaries and their families that integration as a concept should be applied across a 'whole of life' lens, where individuals lead whole lives beyond the setting including employment in open employment (as well as within ADEs), and engagement in a wide range of inclusive activities and valued roles in the community. In this context, the 'specialised setting' is only one piece of a crafted whole.

The WISE-Ability model (Cambell et al., 2024) is one model that seeks to identify the key ingredients of workplace and organisational design to facilitate supported employment and employee wellbeing of people with disability within a WISE model. For example, one aspect of this is to consider the nature of the environments and settings offered to supported employees of ADEs, including those that are community or industry facing or embedded. The model has proven to be highly valued by the ADEs who have used it, but there is need to continue to deepen the understanding of the model, its features, and how to operationalise them in the ADE context. This is of additional importance in relation to how the model functions for some cohorts (for example, for young people and for women).

6.2 Catering for people with significant support needs

While specialised workplaces such as those offered by WISEs above are important to retain, there is also an urgent need to more deeply investigate the needs and aspirations of those with very significant needs, and how to meet these.

Anecdotally, ADEs report increasing difficulty in adequately supporting the needs of those with very high or specialised support needs in a work setting within the context of WorkSafe (work cover) requirements. For some people, inclusion within some (perhaps most) occupational settings does lead to exposure to higher risks than non-occupational settings. This is difficult to manage by employers (open or ADE) as, for this diverse cohort, often specialist skills and workforce are required to provide supports. For example, supported employees may need heightened supervision and vigilance around certain types of workplace equipment or in workplace environments, or require specialist health and personal assistance support (that requires specialist training to deliver), e.g. administration of medications, support with swallowing etc. In at least one instance, an ADE has been considering the employment of nursing staff within the enterprise. While some needs might be able to be addressed through improved facilities and environmental design (e.g. ability to enclose specific work areas, or remove stairs or hazards), this is not always possible in a reduced resource environment and where enterprises are in ageing legacy facilities. In this context, it is likely that the level of supervision and support needed to be provided within a workplace setting may be 1:3 or even 1:1. NDIS funding is not always available at this level. Some ADEs have reported that, due to WorkSafe requirements, their Boards have decided not to accept the level of risk this entails, particularly if there has been a previous workplace accident or injury. In such cases, some individuals are unable to be employed in these already specialised settings.

An additional context for the consideration of specific needs is that of the effect of ageing and premature ageing among supported employees. Some types of disability are associated with other comorbidities and with early ageing related conditions. In general, the ADE workforce is an ageing one and this leads to additional needs for some employees and, potentially, changing

and increased risks to be managed in the workplace. Again, this requires further investigation in relation to the consequences for both the design of work and of workplaces.

In both instances, these significant and often complex needs (sometimes combining physical and cognitive difficulties) will require the planning and delivery of very customised and highly supported workplaces, if people wish to continue with or attain work. It is unlikely that open employers, other than a small number, will be willing to bear the significant 'impact costs' of offering employment to this diverse cohort.

Finally, it is important to highlight that many people with very significant needs spend their time not in employment but in disability day services of various types. For some, this reflects their choice, but many have not been provided with the opportunity to consider or try employment as part of their life activities. This cohort has been the focus of work in the US (for example TransCen) where 'braided' models that enable both time in day services and time in supported employment contexts have been used.

7. How could the benefits of supported employment settings be reflected in open employment settings?

In the main, evaluations have shown that employers have failed to embed valued learnings from current disability employment pilots and initiatives in which they have been involved. This suggests a failure to fully understand and address the barriers to making inclusive employment Business-As-Usual. An employer disability confidence model developed through research between CSI Swinburne, University of Melbourne and Deakin University, suggests that one critical area is the need to equip and authorise personnel at all levels of the employer to identify and address barriers to employment within and beyond the workplace (Qian-Khoo et al., 2024). Supported employment is a step beyond most of the current initiatives and likely to face further challenges for employers and their personnel in mediating barriers to employment.

The WISE-Ability team have begun to consider how this model, or parts of it, may be translated to open employment settings. This includes translating how the supportive mechanisms currently available in ADEs can be made available in open employment such as: customised roles; support staff with disability training/accreditation; developing workplace 'buddies' who have capability to mentor and support employees; among others. There is a need for further applied research with open employers to test whether the WISE-Ability model is a useful tool for open employment settings.

In general, there has been little investment in understanding the drivers of real change in open employment settings.

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