



Illawarra Disability Alliance's Submission
in response to:
“Next Steps in Supported Employment: Consultation on the way forward”
Discussion paper March 2025



SUBMISSION

About Illawarra Disability Alliance

The Illawarra Disability Alliance (IDA) is a group of NDIS registered, not-for-profit disability providers working together to deliver better outcomes for people with a disability in our community.

IDA aims are to:

- work collaboratively with people with disability, their carers, and across agencies and government to advocate for the rights of people with disability and promote inclusion.
- contribute to a strong functioning disability support network which proactively advocates for better outcomes for people with disability.
- represent the local region and support market stewardship by contributing to State and National policy discussions.
- ensure that as service providers we are well informed and supported.
- liaise with all levels of government on region specific issues (e.g., health, education, housing, NDIS, etc) in order to provide sound, timely advice that contributes to quality policy decisions.



Above: Flagstaff Employees at work in Commercial Laundry service

Introduction

The Illawarra Disability Alliance (IDA) welcomes the opportunity to respond to the Department of Social Services' discussion paper "Next Steps in Supported Employment: consultation on the way forward" (March 2025). This submission represents collective input from IDA member organizations in response to the seven questions posed in the Discussion Paper.

About IDA and Our Expertise in Supported Employment

IDA membership comprises providers delivering comprehensive employment services to hundreds of people with disabilities across the Illawarra, across regional NSW and Melbourne Victoria. This substantial reach means members have extensive practical knowledge and deep expertise regarding the current supported employment sector landscape.

Our members operate diverse disability employment service portfolios including:

- Social enterprises and supported employment options.
- School leaver employment support programs.
- Integrated pathways to open employment.
- Grants and structural adjustment activities.
- Innovative ventures such as the Tourism Local Navigators Pilot and IncludeAbility employer partnerships.

This expertise is underpinned by a deep mission-based commitment to social justice, significant business acumen, commercial expertise, and active engagement in grant programs that support business innovation, sustainability and growth.



Above: Greenacres employees at Body Safe Body Bag services.

Our Commitment to Reform

IDA members support the Australian Government's commitment to sector engagement for supported employment reform and innovation. Members welcomed the 2023-24 Budget initiatives, including the Structural Adjustment Fund, Disability Employment Advocacy and Information services, and the Disability Employment (Workability) Expos.

As providers accustomed to adaptation and change, IDA members embraced the findings of the 2023 consultations and share a strong commitment to creating a new, more inclusive employment paradigm in Australia. With the roadmap to achieve this vision under development, IDA providers welcome this opportunity to contribute strategic insights that will enable informed preparation and meaningful sector-wide action.

Current Performance and Future Vision

IDA providers do not operate as static or "final destination" services. Instead, they excel at delivering diverse employment outcomes through integrated pathways that support people to advance their careers and achieve their individual employment goals, whether in supported or mainstream employment settings.

A demonstrated track record of innovation, combined with a comprehensive understanding of both supported and open employment landscapes, positions IDA members to make meaningful contributions to the government's strategy for the future of supported employment in Australia.



Above: The Disability Trust Employees at IVS Lawn Services.

Next Steps in Supported Employment: Consultation on the way forward

IDA Member Submission

Executive Summary

This submission presents the perspectives of the IDA member supported employment providers dedicated to supporting people with the highest support needs. It outlines a comprehensive vision for the future of supported employment that balances ideological goals with evidence-based realities, advocating for a dual-track approach that protects existing supported employees while creating genuine pathways to open employment for those who can benefit from transition, and which supports overall greater disability inclusion in employment in Australia.



Above: The Disability Trust Employees at The Plant Room Café.

Current Context and Challenges

Defining Support Needs and Disability Impacts

The current definition from the DSS paper of "High Support Needs" as *"those who, because of their disabilities, need substantial ongoing support to obtain and/or keep paid employment"* requires development and greater nuance. IDA members provide diverse supports including:

- On-the-job training and task support,

- Direct supervision and group-based participation support,
- Management of disability-related behaviors and complex needs,
- Job customization to enable task completion,
- Work health and safety assessments related to disability impacts, and
- Non-face-to-face activities directly supporting employment

All supported employees, even those who are more independent, receive significant supports essential for work completion, employment continuity, and productivity. These supports must be resourced regardless of whether the person is working in a mainstream or a supported setting.

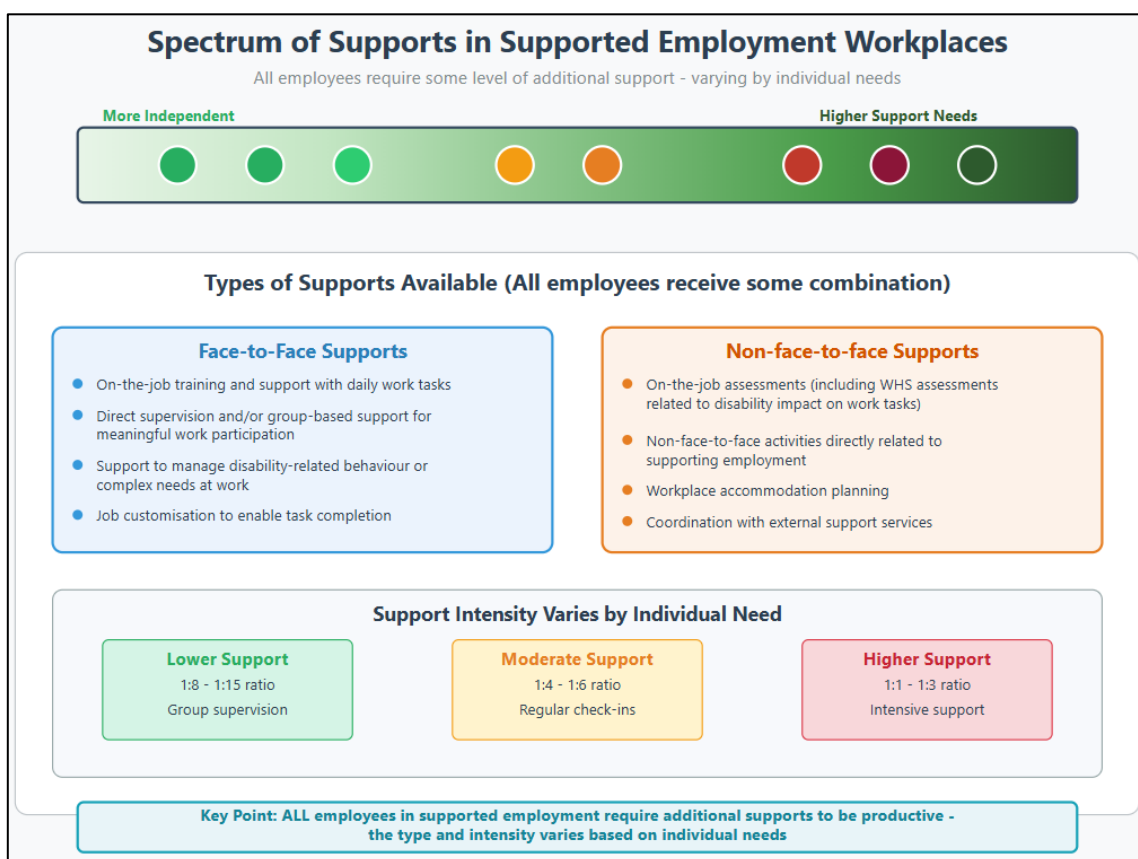


Figure 1 shows the “**spectrum of supports**” provided to supported employees across IDA providers.

The impact of Disability Type on employment outcomes

AIHW¹ data as in the table below demonstrates that employment outcomes vary significantly by disability type, with intellectual disability, acquired brain injury, Down Syndrome, and psychosocial disability showing much lower levels of open employment success. These are the most common disability types among IDA member

¹ [Data downloads - Australian Institute of Health and Welfare](#)

organizations, demonstrating that while transition to open employment remains the policy preference, significant barriers exist for certain disability groups.

Table EFS5: NDIS participants in full award wage employment: NDIS participants aged 15–64 in the labour force who are in open employment at full award wage, by selected characteristics, 2024–25 Q2

	Number (Numerator)	%
By disability group		
Acquired brain injury	803	12.1%
Autism	12,391	23.0%
Cerebral Palsy	1,246	26.5%
Down Syndrome	244	6.3%
Hearing Impairment	7,768	63.5%
Intellectual Disability	4,127	11.2%
Multiple Sclerosis	2,673	57.0%
Psychosocial disability	2,837	10.2%
Spinal Cord Injury	1,180	38.5%
Stroke	509	17.3%
Visual Impairment	1,868	38.7%
Other Neurological	1,979	33.1%
Other Physical	3,152	42.2%
Other Sensory / Speech	48	22.4%
Other(f)	1,106	34.3%
All disabilities	41,931	23.5%

Gaps in table at Appendix 3 (*addressing Question 1*)

IDA members felt that the table at Appendix 3 is quite comprehensive in terms of capturing existing work with a range of important actions noted with many underway. However, IDA recommends strengthening:

- **Elements 7.28 & 7.30:** Expand the Disability Employment Advocacy and Information Program to conduct independent assessments with every supported employee for eligibility determination.
- **Element 7.23:** Establish a Workforce Disability Inclusion Act with reporting requirements and procurement implications (refer to strategic recommendation below).

Our Vision for the Future (*addressing Question 2*)

IDA members vision for the supported employment sector recognizes that at the same time as we operate from a place of inclusion, care and support, the current funding and policy frameworks under which we operate are placing significant strain on organizations like Greenacres, Flagstaff and The Disability Trust all of whom are dedicated to supporting people with the highest support needs to achieve their employment goals.

The ideal future state therefore needs to avoid a purist ideological approach, requiring a nuanced, evidence-based approach that acknowledges the genuine value of supported employment while creating pathways for those who can transition to open employment.

A Dual-Track Approach

The ideal future state requires a nuanced, evidence-based approach acknowledging the genuine value of supported employment while creating pathways for transition:

1. **Pathway to Open Employment:** For individuals where supported employment serves as a stepping stone to mainstream employment
2. **Valued Long-term Employment:** For those with high support needs where supported employment provides ongoing meaningful work, social connection, and community contribution

Core Principles

- **Evidence-Based Decision Making:** Policy guided by actual outcomes rather than ideological preferences.
- **Individual Choice and Advocacy:** Employment journeys determined through genuine independent consultation.
- **Sustainable Service Delivery:** Funding models supporting organizations serving high support needs.
- **Quality over Tokenism:** Meaningful employment outcomes prioritized over superficial inclusion metrics.



Above: Greenacres employees at Scaffolding services.

Strategic Recommendations

1. Introduce Legislation that drives disability inclusion

Establish a Workplace Disability Inclusion Act (*addressing Question 3*)

Australia is not achieving meaningful employment outcomes for people with disability due to segregated thinking and a failure to implement policy decisions that genuinely support workplace inclusion. This issue requires national-level intervention with transparency, accountability, and real-world consequences for non-compliance.

We can see the scale of this issue (e.g. refer to Figure below²) is of national significance and therefore requires a national level response.



The current approach lacks the systematic framework needed to drive genuine change across both private and public sectors. As the 2022 OECD Report states:

- *"Disability mainstreaming, i.e. a disability-inclusive approach in all relevant mainstream services and institutions, will help to achieve the shift to early intervention in all policies, including education and youth policies, employment, skills and labour market policies, and social protection policies."*

Australia requires national-level intervention with transparency, accountability, and consequences for non-compliance. Following the successful Workplace Gender Equality Agency model:

- Create a Workplace Disability Inclusion Authority with mandatory reporting requirements.
- Generate compliance certificates for organizations meeting requirements.
- Link compliance to Commonwealth procurement eligibility.
- Set sector-specific disability employment targets with genuine consequences.

2. Grandfathering Framework with Individual Tracking (*addressing Question 4 - Roadmap elements*)

² Deloitte Access Economics 2018. Increased labour force engagement among Australians with a disability. Report prepared for the NDIA, September 2018

- Establish formal grandfathering arrangements for current supported employees.
- Fund independent advocates for documented 1:1 assessments with all supported employees to assess their preferences and choices.
- Implement comprehensive individual-level data tracking including:
 - Employment data (hours, wages, rates),
 - NDIS support data (hours, ratios),
 - Income support data (DSP amounts),
 - Quality of life indicators and non financial benefits.
- Allow natural attrition without backfilling grandfathered positions.

3. Enhanced Funding and Business Model Reform

Supporting Legacy Providers (*addressing Question 5 - wage increases*)

- Provide additional targeted funding for providers supporting high numbers of people with high support needs.
- Enable separation of commercially viable and non-commercially viable service components.
- Support business model transformation (e.g. through expanded SEDI grants) and sophisticated business analysis.
- Implement outcome payments for transitions to mainstream employment.

4. Safety Net

- Guarantee robust safety net protections including:
 - Continued DSP access during transitions.
 - Maintenance of transport, pharmaceutical, and housing benefits.
 - Clear pathways back to supported employment if open placements fail.

5. Enhanced DES Collaboration and Support Structure

- Strengthen DES pivot to provide hands-on support for higher support needs and prioritised groups (noting poorer outcomes for certain disability groups such as per the table below³).
- Leverage existing supported employment providers as job coaches through foundational supports.
- Develop clear transition pathways and support mechanisms.

³ [Data downloads - Australian Institute of Health and Welfare](#)

Table EFS1: Disability Employment Services: Number of valid 52-week full outcome claims for employment in the 12-month period for people with disability, by selected characteristics, 2023–24	
	Number
By Primary disability(c)	
Physical	9,434
Psychiatric	10,258
Specific Learning	793
Intellectual	1,092
Neurological	845
Autism	1,623
Hearing	267
Acquired brain injury	238
Vision	229
Speech	40
Deafblind	21
Unknown	5
All disabilities	24,845
By refugee status(d)	
Refugee	972
Non-Refugee	22,938
Missing/Not stated	935
All persons	24,845

Risk Mitigation and Change Management

Throughout implementation of this road map it is essential that any transition be carefully managed recognizing particularly that many supported employees express satisfaction with current arrangements. This requires:

- Voluntary participation based on individual choice and advocacy.
- Comprehensive change management support for families and employees.
- Clear government messaging about realistic expectations.
- Focus on genuine inclusion rather than tokenistic placement.



Above: The Disability Trust employees at Marriott Bonded Warehouse Services.

The Ongoing Role of Specialised Workplaces (*addressing Question 6*)

There remains a strong demand and expectation from the community and value in the Illawarra Region for the work that is done in specialised workplace environments for the foreseeable future. These workplaces are specialised support and training centres.

A key consideration is the notion of “segregated” – transformation is underway for ADE’s into therapeutic and supportive work environments that are not segregated (as indeed many already are not) but become more of a pathway and option with many people with and without disability working across a diverse range of roles.

Specialised employment opportunities will continue providing value as:

- Therapeutic and supportive work environments acting as pathways rather than endpoints.
- Assessment and capability development centres for those missing employment opportunities.
- Incubators supporting work-readiness activities.
- Integrated environments where people with and without disability work together.



Above: The Disability Trust Employees at IVS Lawn Services.

Transferring Benefits to Open Employment (*addressing Question 7*)

Core Expertise Transfer

Supported employment settings have developed significant expertise that can be integrated into open employment environments:

- Communication strategies tailored to diverse needs.
- Team collaboration approaches maximizing inclusion.
- Structured work skills development programs.
- Comprehensive job readiness preparation.

Implementation Requirements

- Dedicated funding streams for ongoing support services.
- Recognition that foundational supports represent additional employer costs.
- Systemic change focus on mainstream employment settings.
- Simplified processes for employers to recruit and support people with disability.
- Clear guidance on accessing funding and demonstrating financial benefits.
- Robust safeguards ensuring consistent support access regardless of employer.

Measuring Success

Success should be measured not by the number of people moved from supported to open employment, but by the quality of employment outcomes achieved for each individual based on their unique needs, preferences, and capabilities. Individual-level tracking will provide the evidence base needed to ensure reform efforts genuinely improve outcomes rather than simply meeting policy objectives.

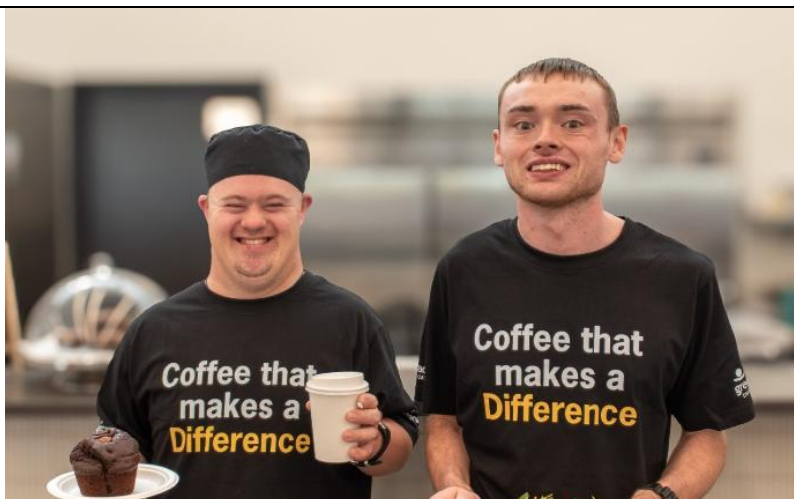


Above: Flagstaff Employees at Print Mail and Digital services

Conclusion

The future of supported employment requires system reform addressing both the needs of people with high support needs and the broader goal of inclusive employment. This IDA members submission outlines a comprehensive approach that protects vulnerable employees, recognises the value and need for specialised supported environments and businesses that can cater to the needs of supported employees while creating genuine pathways to inclusion, backed up by legislative frameworks, adequate funding, and evidence-based decision making.

The establishment of a Workplace Disability Inclusion Act and Authority (or similar model to drive a systems level whole of societal reform), combined with strengthened procurement policies, enhanced funding models, and genuine accountability measures, provides the framework needed to achieve meaningful employment inclusion for people with disability in Australia while protecting those who benefit from continued supported employment arrangements.



Above: Greenacres employees at work at a Brewing Up a Storm Café.

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