



**NATIONAL ETHNIC
DISABILITY ALLIANCE**

**Submission to the Department of Social
Services on the Next Steps in Supported
Employment:
Consultation on the way forward**



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Acknowledgement of Country

NEDA acknowledges the Traditional Owners and Custodians of the lands across Australia on which we live, work, and play. We pay our respects to Elders past, present and emerging, and acknowledge their long history of advocacy for rights, inclusion, and self-determination. These efforts continue to inspire and guide our work for equity and justice.

Introduction

The National Ethnic Disability Alliance (NEDA) appreciates the opportunity to provide a submission in response to the *Next Steps in Supported Employment* consultation paper, with a specific focus on the recommendations from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (the Royal Commission) (Final Report, September 2023): 7.30 Increasing Inclusive Employment, 7.31 Raising Subminimum Wages, and 7.32 Ending Segregated Employment.

As a national Disabled People's Organisation and peak body, NEDA advocates for the rights and interests of people with disability from culturally and linguistically diverse (CALD) backgrounds. This submission, guided by the Human Rights Model and the Social Model of Disability, is framed around both equality and equity needed for effective reforms.

Article 27 of the United Nations Convention on the Rights of Persons with Disabilities (CRPD) recognises the right of people with disability to work on an equal basis with others; this includes the right to gain a living by work freely chosen or accepted in a labour market and a work environment that is open, inclusive, and accessible. It also affirms the right to equal remuneration for work of equal value, and to just and favourable conditions of work. While the CRPD emphasises equality, our response also considers equity, acknowledging that achieving genuine inclusion for people with disability from CALD backgrounds requires addressing unique and compounding forms of disadvantage. The Royal Commission's findings on intersectional risks faced by people with disability from CALD backgrounds ¹ highlights the need for an equitable approach. Reform interventions must be informed by equity and involve strategies to address specific needs such as providing culturally and linguistically responsive and appropriate support services.

This submission seeks to elevate the perspectives, experiences, and needs of people with disability from CALD backgrounds. As reforms progress, NEDA welcomes the opportunity

¹ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (2021). *Towards best practice access to services for CALD people with disability and Auslan users*.

to provide detailed input and to participate in co-design and consultation processes on these issues.

Context

NEDA advocates for people with disability from CALD backgrounds. It is important to note that people with disability from CALD backgrounds are not a homogenous group. They include people with varied cultural identities, migration pathways, languages, and family and community structures. Various factors shape how individuals access supports, navigate barriers, and participate in employment. Research shows that disadvantage does not arise simply from cultural or linguistic difference alone, but from how systems are shaped by structural barriers, restrictive migration regimes, and institutional norms that define who is regarded as “normal” or “legitimate.” From this perspective, the challenges faced by people with disability from CALD backgrounds within employment systems and across different employment models are complex and intersectional.

In open employment, standard recruitment and interview processes are not always truly inclusive. For people with disability from CALD backgrounds, the barriers are compounded by multiple forms of discrimination based on culture, language, and disability. For supported employment to be effective for CALD individuals, the reforms must involve co-design and consultation processes with CALD communities. Further, the supports and services must include cultural responsiveness, linguistic appropriateness, and trauma-informed approaches to meet the unique needs of CALD communities.

Increasing Inclusive Employment

Disability Royal Commission - Recommendation 7.30

The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability recommended the development of a national plan to increase inclusive employment opportunities for people with disability, with a particular focus on those with high support needs.² The national plan must take an intersectional approach, explicitly recognising the unique and compounding barriers faced by people with intersecting needs, including people from CALD backgrounds, and a commitment to addressing these needs through targeted actions.

² Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (2023). *Final Report, Volume 7: Inclusive education, employment and housing (Part B)*. Canberra: Commonwealth of Australia.

Drawing on the Social Model of disability, which recognises social barriers, we recommend the plan support inclusive employment reforms that are flexible, culturally responsive, and inclusive of diverse pathways. Importantly, being culturally responsive is not only about providing translated documents or interpreter services, but about designing information, systems and services in ways that reflect how CALD communities understand and engage with them. This would need to be complemented with a trauma-informed approach to reforms. Trauma-informed and culturally responsive practices acknowledge the role of migration experiences, racism, stigma, language and digital barriers, socioeconomic disadvantage, gender dynamics, and the unique ways in which these shape how people seek and use support. When services and workplaces are designed to be accessible from the outset, they remove barriers for people with disability and improve usability for all members of the community.

We recommend that the national plan support human-rights, as well as equity-based, reform approaches by engaging people with disability, including representative organisations and individuals from CALD communities in co-design and consultation processes to ensure their perspectives are central to, and embedded in, the planned interventions. Co-design with CALD people with disability is critical to building services accessible for those with the most complex barriers, which would in turn improve accessibility for everyone. This means flexible work options, accessible infrastructure, culturally responsive systems and pathways, and meaningful representation in service design and delivery.

Members of the CALD disability community have emphasised that if all workplaces, transport systems, and building codes were designed to be accessible for everyone, it may remove the perception that people with high support needs are a ‘burden’.

“If we make all workplaces accessible for all people, then it will benefit everyone. You can then hire anyone, and it will not be a burden.”

- Mary Anne Cosic, NEDA Council President

Inclusive employment is not only a matter of fairness and rights but also often of demonstrated social benefit. A diverse workforce fosters innovation, encourages cultural awareness, and can improve organisational performance. Evidence shows that employers

who hire and support the accessibility needs of people with disability report improved staff morale, lower turnover, and stronger reputational outcomes.³

Employer Policies & Practice

Genuine policy reform requires not just commitments on paper, but practical implementation and operationalisation, backed by accountability, resources, and cultural change within workplaces. Employers must be supported and encouraged to recognise the value of a diverse workforce and to adapt policies and practices with training, accordingly.

- Promote pre-emptive flexibility and extended personal leave in employer policy and practice to reflect the realities of fluctuating disability support and accessibility needs. Employers can be supported to recognise that flexibility is not a reduction in productivity but an enabler of sustainable work. With the right support in place, such as remote work options or adjusted hours, employees with disability can perform effectively and contribute long-term. Australian evidence shows that workplaces offering flexible arrangements report higher employee satisfaction, stronger retention, and reduced absenteeism.^{4, 5}
- Inclusion must not rely on segregated employment models, which shift responsibility away from mainstream employers. True inclusion requires all employers to build accessibility and inclusive practices into workplaces.⁶
- Address the lack of representation of people with disability in front-facing and leadership roles, strengthening visibility and influence across all levels of the workforce. Greater representation shifts community perceptions, challenging the tendency to underestimate or devalue people with disability, and breaking down preconceived attitudes.⁷ CALD people with disability also bring knowledge

³ Australian Human Rights Commission (2021). *The Economic and Business Benefits of Employing People with Disability*. IncludeAbility Factsheet. Canberra: AHRC. [includeability - factsheet - the business and economic benefits of employing people with disability.pdf](https://www.hrc.gov.au/sites/default/files/2021-07/includeability-factsheet-the-business-and-economic-benefits-of-employing-people-with-disability.pdf)

⁴ Fair Work Ombudsman (2023). *Flexible Working Arrangements – Best Practice Guide*. Canberra: Fair Work Ombudsman. <https://www.fairwork.gov.au/sites/default/files/2023-09/flexible-working-arrangements-best-practice-guide-bpg.pdf>

⁵ Australian Public Service Commission (2022). *State of the Service Report 2021–22*. Canberra: Australian Government. <https://www.apsc.gov.au/state-service/state-service-report-2021-22>

⁶ Australian Human Rights Commission (2025). *Submission to the Department of Social Services on Next Steps in Supported Employment*. Canberra: AHRC. [2025-07-04 AHRC Submission on Next Steps in Supported Employment_0_0.pdf](https://www.hrc.gov.au/sites/default/files/2025-07-04_AHRC_Submission_on_Next_Steps_in_Supported_Employment_0_0.pdf)

⁷ National Ethnic Disability Alliance (NEDA), People with Disability Australia (PWDA) & Federation of Ethnic Communities' Councils of Australia (FECCA) (2021). *The experiences and perspectives of people with disability from culturally and linguistically diverse backgrounds: Joint submission to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability*. Canberra: NEDA, PWDA & FECCA.

grounded in lived experience and a deeper understanding and experience of how to support and navigate systems, meaning they should not only be consulted but meaningfully represented within organisations at all levels.

- Transition from symbolic hiring practices to inclusive, strategic approaches that deliver meaningful, sustained employment and genuine opportunities for career progression. This includes addressing hiring practices that create perverse incentives or operate as ‘tick-the-box’ measures, rather than fostering long-term inclusion and equity.
- Stakeholders have advised NEDA that the potential of people with disability is often underestimated, with assumptions made about their abilities that result in them being directed toward limited forms of employment, including unpaid or volunteer roles. NEDA is of the view that reforms must instead recognise and value the skills and contributions of people with disability to support meaningful paid employment.

Service & System Reform

Support providers to deliver employment services that reflect cultural and linguistic diversity, trauma-informed approaches, and variable work capacities, ⁸ ensuring equitable access and meaningful participation for people with disability from CALD backgrounds.

- Employment services should better reflect the diversity of disability in the community, with people with lived experience represented in staffing, governance, and service design. Providers must not underestimate or undervalue the skills, aspirations, and potential of people with disability.
- Embed training to develop cultural competence within employment services through targeted training and co-design with CALD disability organisations, communities and people.
- Build pathways for people with disability who bring significant professional experience but also live with fluctuating symptoms, offering flexible arrangements that enable participation rather than exclusion.
- Our stakeholders advised that informal networks rather than employment services are often where people secure jobs. However, people with disability, particularly those from CALD backgrounds, face barriers to building and maintaining these

⁸ Australian Human Rights Commission (2016). *Willing to Work: National Inquiry into Employment Discrimination against Older Australians and Australians with Disability – Factsheet: Australians with Disability*. Sydney: AHRC, p. 4. [Willing to Work factsheet - DISABILITY 2016.docx](#)

networks, compounded by restrictions that tie them to a single employment service provider at a time. Research has highlighted that CALD people with disability experience systemic barriers in employment service engagement, including limited pathways and support adaptability.⁹

- Invest in confidence-building, networking, and self-advocacy programs for CALD people with disability to strengthen professional connections.
- Address geographic barriers by expanding access to inclusive employment opportunities for CALD people with disability in regional and remote areas where labour markets are thin. Solutions include investing in social enterprises and community-led initiatives, subsidising inclusive employers in regional areas, embedding remote and hybrid work models supported by digital infrastructure, and funding targeted transport and mobility schemes. Collaboration with CALD disability communities, organisations as well as local governments is essential to ensure that employment pathways are accessible, culturally responsive, and tailored to local labour market conditions.

Access & Infrastructure

Barriers in the built environment, transport, and workplace systems remain some of the most persistent obstacles to inclusive employment. For CALD people with disability, these barriers are often compounded by additional challenges such as language barriers and limited access to advocacy and support systems. Creating inclusive employment opportunities therefore requires investment in accessible infrastructure, transport, workplace adjustments, and data systems.

- Ensure building codes and standards reflect contemporary accessibility needs, including the evolving design of modern wheelchairs and mobility aids, which may not be fully accommodated under all existing requirements. Regularly updating these standards is essential to universal inclusion and compliance with the Disability Discrimination Act 1992.
- Expand investment in accessible workplaces, transport, and building standards, recognising that universal accessibility benefits all employees, not just those with disability.

⁹ FECCA, *Employment services and outcomes for CALD people with disability*, (Canberra, FECCA, January 2016) 5.

- Prioritise accessible and affordable public transport, as members highlighted that high costs and limited access prevent and/or limit participation in the workforce.
- Promote flexible work arrangements, including remote work options and integration into the workplace. Simplify processes for workplace adjustments and modifications, reducing administrative barriers for employers and employees alike.
- Monitor progress using disaggregated data (such as ethnicity, language, migration status) to track equity in outcomes. This must be undertaken in ways that uphold privacy and confidentiality, build trust with CALD communities, and are guided by trauma-informed approaches to data collection and reporting.¹⁰

Raising Subminimum Wages

Disability Royal Commission - Recommendation 7.31

Consistent with human rights obligations and fair work principles, NEDA supports an increase to 100% of the national minimum wage for all employees with disability . Research indicates substantial underpayment of employees with disability, particularly in segregated settings such as ADEs, where wages as low as \$3.01 per hour have been cited as being legally permitted¹¹ People employed in such settings are disproportionately from marginalised backgrounds, including CALD communities, and frequently¹²

Aligned with the 2025 Economic Justice for People with Disability: A National Blueprint, NEDA along with other Disability Representative Organisations (DROs), called for a justice-driven shift in wage practices to deliver economic security and recognition of the full value of work performed by people with disability.¹³

In accordance with Article 27 of the CRPD and Recommendation 7.31 of the Royal Commission's *Final Report* (2023), achieving fair and equitable wages is central to realising the right to work on an equal basis with others. Wage reform must recognise the compounded disadvantage faced by CALD people with disability, who are more likely to be

¹⁰ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (2020). Interim Report. Canberra: Commonwealth of Australia

¹¹ *Charlotte's friends with Down syndrome are paid \$3 an hour. It's legal in Australia — and she's taking a stand*, Guardian Australia, 20 March 2023

¹² Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (2023). *Final Report Volume 4: Realising the human rights of people with disability*. Canberra: Commonwealth of Australia.

¹³ People with Disability Australia (2025). *Primary Election 25: National Blueprint*. Canberra: PWDA. <https://pwd.org.au/wp-content/uploads/2025/04/Primary-Election-25-NationalBlueprint.pdf>

employed in low-paid or segregated settings and face additional barriers to understanding and asserting their workplace rights.

- CALD disability-led organisations should be resourced to provide independent advocacy and support for people navigating the transition to open employment, in a trusted and culturally informed manner which is essential for building trust and overcoming systemic gaps.
- Stakeholders expressed concern that productivity-based wages can be dehumanising and inequitable. They often quantify the contributions of employees with disability relative to a narrow set of outputs, failing to account for contextual, adaptive, or variable performance.
- Wage justice is critical to economic participation, dignity, and autonomy, particularly for those such as CALD people with disability who already experience compounded disadvantage. Fair wages are imperative when it comes to challenging narratives that frame people with disability as “a burden,”:

“If people with disability are increasingly supported to work full-time and pay taxes, they can put money back into supporting those who cannot work. That way we are not seen as a burden.”

- Mary Anne Cosic, NEDA Council President

Ending Segregated Employment

Disability Royal Commission - Recommendation 7.32

Segregated workplaces continue to persist not because segregation is desirable, but because open employment remains largely inaccessible for people with disability, particularly from CALD backgrounds, as highlighted by our stakeholders during consultations. Without systemic reform, CALD people with disability risk being further marginalised. Scholars have argued that disability-segregated employment settings, such as Australian Disability Enterprises (ADEs), can constitute forms of exploitation, forced labour, or servitude under international law, aligning with the indicators of modern slavery.¹⁴ The UN Special Rapporteur on Contemporary Forms of Slavery has similarly noted that segregation and subminimum wage practices place people with disability at

¹⁴ Steele, L. (2023). *Modern Slavery and Disability Segregated Employment: Exploitation, Forced Labour and Servitude in Australian Disability Enterprises*. *Disability & Society*, 37(6), pp. 1001–1024.
<https://opus.lib.uts.edu.au/handle/10453/164970>

heightened risk of exploitation and abuse, reinforcing the urgency of transition to inclusive employment.¹⁵

“Special jobs for people with disability exist because open employment isn’t working. If open employment was truly inclusive, we wouldn’t need segregation.”

- Community member with disability from a CALD background

CALD people with disability often face compounding barriers in segregated settings, including exploitation risks, limited access to complaints pathways, and little oversight.¹⁶ CALD women with disability have reported fears of unknown consequences when considering formal reporting, suggesting a broader reluctance to raise concerns publicly or through the media due to fear of stigma, discrimination, or cultural scrutiny.¹⁷ Addressing these risks requires funded transition supports, diverse and inclusive pathways, and strong accountability mechanisms, including:

- Funded, tailored supports for CALD individuals with disability transitioning out of ADEs, including in-language navigation assistance and culturally appropriate transition planning.
- Collaboration with culturally appropriate community-led organisations to design transition materials and outreach.
- Reforms must not rely solely on large corporations to deliver inclusion; CALD people with disability must also have access to diverse, local employment opportunities across sectors and regions.
- Ongoing monitoring and evaluation, with disaggregated data (e.g. ethnicity, language, migration status), to track outcomes and support equity of impact.

¹⁵ United Nations Human Rights Council (2025). *Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, on his visit to Australia*. UN Doc A/HRC/60/28/Add.1. Geneva: OHCHR. <https://docs.un.org/en/A/HRC/60/28/Add.1>

¹⁶ AMPARO Advocacy, *Response to the CALD Issues Paper: Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability*, AMPARO Advocacy, Brisbane, 2021. <https://www.amparo.org.au/wp-content/uploads/2021/12/AMPAROs-Response-to-CALD-Issues-paper-DRC.pdf>

¹⁷ Women’s Legal Service NSW, *Submission to the Disability Royal Commission: Experiences of CALD people with disability*, Women’s Legal Service NSW, Sydney, 2021. <https://www.wlsnsw.org.au/wp-content/uploads/WLS-NSW-Sub-DRC-Experience-of-CALD-people-with-disability-fa.pdf>

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