



Submission to DSS about Next Steps in Supported Employment: consultation on the way forward

[22 June 2025]

About the Submitter

JFA Purple Orange is an independent, social-profit organisation that undertakes systemic policy analysis and advocacy across a range of issues affecting people with disability and their families.

Our work is characterised by co-design and co-production, and includes hosting a number of user-led initiatives.

Much of our work involves connecting people with disability to good information and to each other. We also work extensively in multi-stakeholder consultation and collaboration, especially around policy and practice that helps ensure people with disability are welcomed as valued members of the mainstream community.

Our work is informed by a model called *Citizenhood*.

JFA Purple Orange
104 Greenhill Road
Unley SA 5061 AUSTRALIA

Telephone: + 61 (8) 8373 8333

Email: admin@purpleorange.org.au

Website: www.purpleorange.org.au

Facebook: www.facebook.com/jfapurpleorange

Contributors

James Murphy, Policy and Research Leader

Rebecca Dowd, Business Development Lead

Tracey Wallace, Strategy Lead

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1. Summary and recommendations

We recommend:

Recommendation 1: The Department of Social Services should take a strong position against all policies and practices of segregation in employment and should publicly reject false claims that segregation can constitute a genuine ‘choice’.

Recommendation 2: The Federal Government should immediately cease funding for any new segregated forms of employment including, but not limited to, supported employment options such as Australian Disability Enterprises (ADEs). Any Plan or Roadmap to guide further reform in the supported employment sector should place emphasis on the transition away from segregated employment. All public money should be invested in authentically inclusive infrastructure, services, and programs that provide the foundations for a transition to truly inclusive employment options for people with disability.

Recommendation 3: The Department of Social Services should recognise the importance of informal natural safeguards in the lives of all Australians and reject policies and practices of segregation because these actively undermine the prevention of violence, abuse, neglect, and exploitation.

Recommendation 4: The Department of Social Services should commit to removing mutual obligations for people with disability which hinder the achievement of meaningful sustainable employment outcomes.

Recommendation 5: The Department of Social Services should ensure Inclusive Employment Australia supports employers to remove barriers to employment for people with disability and achieve improved employment outcomes.

Recommendation 6: The Department of Social Services should take urgent steps to co-design a comprehensive funded transition plan to end the Supported Work System and the Supported Employment Services Award in Australia.

Recommendation 7: The Federal Government should proactively lead a national co-design process to develop a staged, timebound, transition plan that supports ADEs to implement new inclusive business models and invests in ensuring Australian workplaces become fully inclusive and accessible.

Recommendation 8: The Department of Social Services should commit to a comprehensive lifecycle approach, led by the Centre for Inclusive Employment, to education, skills development, goal setting and career planning, and the transition from education to employment. This commitment should be evident in the Centre's initial resources and online hub which is due to be established in September 2025.

Recommendation 9: The Department of Social Services should engage people with disability in a comprehensive co-design process to review Inclusive Employment Australia's model to ensure this will result in positive employment outcomes for people with disability and avoid negative consequences, such as the perverse provider payment incentives that pervade the current DES approach.

Recommendation 10: The Federal Government, Department of Social Services and, once established, the Centre for Inclusive Employment should proactively pursue and fund the collection of more frequent high-quality data about the employment experiences and outcomes of Australians with disability, recognising that increased and improved data collection is essential to maximising the opportunities and benefits of the proposed Centre.

Recommendation 11: The Centre for Inclusive Employment should provide strong leadership and investment in building the capacity of employers and industries to employ Australians with disability in sustainable mainstream Award-waged roles. It should also

have a strong mandate to address barriers to access and inclusion in the workforce and in workplaces, including recruitment processes, as well as to identify and showcase proven pathways that can be replicated and scaled up.

Recommendation 12: The Department of Social Services should evaluate and adapt programs such as the Colliers Just Transition Plan of the Western Australian Government to the disability employment context and invest in individualised tailored plans that meet workers' own individual and family needs.

Recommendation 13: The Department of Social Services should recognise the value of peer support networks for improving the employment prospects of people with disability and commit to long-term funding to support their operations as a separate dedicated stream from other capacity building initiatives.

2. Introduction

Australians with disability have a right to work in the mainstream workforce, not in segregated or exploitative separate systems. Article 27 of the United Nations Convention on the Rights of People with Disabilities (“UNCRPD”) states that all people with disability have the right ‘to work, on an equal basis with others; this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive, and accessible to persons with disabilities’. Australia’s ratification of the UNCRPD comes with responsibilities to ensure that people with disability have a fair go in the open labour market, are supported within mainstream inclusive workplaces, and do not experience any form of discrimination such as in recruitment processes, pay and conditions, accessibility of work environments, career advancement, or health and safety.

To date, Australia’s progress in fulfilling its international obligations has been slow. In particular, the UN Committee on the Rights of Persons with Disabilities, which monitors the implementation of the UNCRPD, is concerned about the very low workforce participation rates of women with disability, First Nations people with disability, and people from culturally and linguistically diverse backgrounds with disability.¹ We wholeheartedly endorsed the recommendations of Disability Royal Commission (“DRC”) Commissioners Bennett, Galbally, Mason, and McEwin to end segregated employment and subminimum wages, although we strongly believe that this can be, and should be, achieved within the term of the current *Australia’s Disability Strategy 2021-2031*. We are disappointed the Discussion Paper does not share this aspiration.

It is well known that employment significantly advances a person’s physical and mental health and enables a greater level of independence and financial security. Employment is

¹ See Committee on the Rights of Persons with Disabilities, ‘Concluding observations on the combined second and third periodic reports of Australia,’ 15 October 2019, at <https://undocs.org/CRPD/C/AUS/CO/2-3>.

not only an economic benefit to the person and the nation but also offers each person a sense of purpose, enabling them to pursue personal interests and make valued contributions, connections, and relationships with others in the community. Employment also creates a strong natural safeguard and leads to further opportunities with respect to education, housing, and the enjoyment of other basic human rights.

In this submission, we reflect on the current situation for Australians with disability in terms of employment outcomes, what must change, and our vision for the future. We make recommendations aimed at ensuring that the right of each person of working age to be included in the mainstream workforce is protected, respected and promoted in Australia.

3. The Current State of Employment for People with Disability

Australians with disability are severely underrepresented in the workforce. According to the Australian Bureau of Statistics (ABS), the workforce participation rate (people either employed or available to work) for working aged people with disability was 60.5 per cent in 2022 compared to 84.9 per cent for people without disability.² However, it is very likely that the size of the available labour force continues to be significantly understated given the enduring tendency to assign deficits and low expectations to people with disability rather than focusing on their skills, strengths, and capacity. Significant effort is required to create the expectation that people with disability are, and will be, active participants in the Australian workforce and to challenge misconceptions that they cannot contribute as much, or as well, as their non-disabled peers.

3.1. Higher Unemployment Rates

² <https://pwd.org.au/australian-bureau-of-statistics-releases-new-disability-statistics/>.

While much attention is rightly given to rates of unemployment, more than 30 per cent of Australians with disability of working age are rendered invisible by an outdated approach to measuring the available labour force that excludes so many people from having potential for employment. The unemployment rate for people with disability considered part of the labour force (that is, the 60.5 per cent mentioned above) was 7.5 per cent in 2022 compared to 3.1 per cent for non-disabled people at that time.

3.2. Workplace discrimination

In 2022, according to the most recently reported statistics, one in ten people with disability (9.9 per cent) reported experiencing discrimination. A quarter of these people (24.5 per cent) reported their employer as the source of this discrimination. This was the third highest source, following service and hospitality staff and strangers in the street. Of people with disability who experienced discrimination in the labour force, 40.2 per cent reported their employer as the source, while 37.7 per cent attributed this to work colleagues. Given the barriers to reporting, this is likely to be an underestimate of the prevalence of workplace discrimination.

3.3. Lower Gross Incomes

The median gross personal income of a person with disability was \$575 per week in 2022, less than half that of a non-disabled person at \$1055 per week at that time. These statistics from 2022 are the most recent publicly available due to the infrequency of data collection about Australians with disability and the exclusion of a disability variable from many mainstream surveys, including the ABS Labour Force Survey (LFS), which reports monthly and quarterly about the employment experiences of Australian workers.

3.4. The current state of segregated employment

The statistics outlined above paint a stark picture about the employment outcomes for Australians with disability compared to their non-disabled peers generally. However, for those stuck in segregated or exploitative separate systems, the current situation is even more bleak. There are two aspects of the so-called Supported Wage System (SWS) that continue to inflict segregation or exploitation on workers with disability: one that is used by supported employment services that were previously called ‘sheltered workshops’ but are now given the misleading label of social enterprises, and the second that is used by other employers offering so-called ‘open employment’.

Both result in workers being paid very low wages that are out of step with the minimum wage that applies to other workers. The effect of this arrangement is these workers are kept in poverty and cannot make the range of life choices that are available to others. For workers in ADEs, the low wage rates are even lower because the productivity adjustments are applied to the already extremely low pay rates within the Supported Employment Services Award. Typically, these workers continue to receive the Disability Support Pension (DSP) to somewhat prop up their income, although their DSP can also be reduced if their ‘wage’ reaches relevant thresholds.

Pursuant to the Supported Employment Services Award, **a minimum wage rate of \$6.03 per hour** applies to Grade A workers in ADEs (Clause 15.2), which **can be reduced to as little as \$3.01 per hour** by a productivity assessment (Schedule D.4.1).³ The Supported Wage System assessment is now the only assessment tool available to assess productive capacity and the National Panel of Assessors (NPA), not the employer, must conduct the assessment. Unfortunately, employers have until 30 June 2026 (Schedule H.2.2) to update the assessments of workers previously assessed by employers using other tools. This is too long given the Fair Work Commission has accepted that employers’ use of other tools meant

³ See further <https://www.fairwork.gov.au/pay-and-wages/minimum-wages/supported-employment-services-award-pay-rates>.

many were ‘permitted, in practice, to set their own minimum wages for supported employees rather than have them determined objectively’.⁴ It is likely many affected workers are being paid below what an objective assessment would determine, and this could continue until mid-2026.

3.5. The Disability Royal Commission’s Findings

As the DRC Final Report noted, there are more than 17,000 people working at about 161 ADEs, but the fact the Commissioners highlighted that ‘it is difficult to identify with precision’ the number of workers, despite having the powers of a Royal Commission, is extremely concerning.⁵ There is a clear need for closer monitoring and transparent reporting of aggregated and disaggregated data about all facets of the SWS. The ADE model relies on both segregation and exploitation of workers with disability.

ADE employees with disability receive individual productivity-based wages below award and minimum wages, are congregated in segregated workplaces, are unlikely to move into open employment, and can be subjected to restrictive practices that reduce their freedom of movement and rights within the workplace. At the same time, the organisations that operate ADEs receive financial benefits through lower labour costs, receiving National Disability Insurance Scheme (‘NDIS’) funding, and having a competitive advantage in government procurement.⁶

ADEs are directly harmful to the life chances of people with disability and trapping people in a lifetime of poverty. ADEs are incentivised to hold on to their most productive workers

⁴ See [315] – [316] of the Fair Work Commission Decision [2019] FWCFB 8179, 4 yearly review of modern awards—*Supported Employment Services Award 2010* (AM2014/286), 3 December 2019, available at <https://www.fwc.gov.au/hearings-decisions/major-cases/4-yearly-review/awards-under-review/supported-employment-services>.

⁵ Disability Royal Commission, Final Report, Volume 7: Inclusive education, employment, and housing – Part B, 2023, p.464, available at <https://disability.royalcommission.gov.au/publications/final-report>.

⁶ Steele, Linda, *Law and Disability ‘Supported’ Employment in Australia: The Case for Ending Segregation, Discrimination, Exploitation and Violence of People with Disability at Work* (August 10, 2022) p. 2.

rather than enable their advancement into mainstream employment opportunities because this productivity ensures the ADE can fulfill its commercial commitments to customers.

The second part of the SWS allows ‘mainstream’ employers, often supermarkets, retailers, or fast-food outlets, to exploit workers with disability on wages that are lower than their peers within the same workplace doing the same job. It is often overlooked in discussions about ending segregation and exploitation because this model does not involve the same degree of overt segregation of people with disability as that of ADEs. Yet, it is also highly exploitative and still perpetuates separateness within the workplace environment by creating a different system of wages and rules that only apply to part of the workforce.

Against this background, it is very overdue to imagine an ideal future state for the Supported Employment Sector.

4. Ideal Future State for the Supported Employment Sector

4.1. Phasing Out Segregated Models

JFA Purple Orange envisions a future where supported employment is fully aligned with the principles of the UNCRPD. The Discussion Paper regularly refers to “genuine choice” and “genuine opportunities” for people with disability, without offering a genuine plan for transitioning Australian Disability Enterprises (ADEs) into business models which would offer such choice and opportunity. Instead, the Discussion Paper remains ambiguous about the future of sub-mainstream award-waged, segregated settings. As we will explain, supported employment doesn’t necessarily equate to or necessitate segregated employment.

The progress made toward deinstitutionalisation has not resulted in an end to the segregation for Australians with disability. Indeed, in numerous instances, it has simply heralded the creation of new forms of exclusion, marginalisation, and inequality in Australia. People with intellectual disability and those with multiple or complex disabilities or high support needs are more likely to be funnelled into segregated and congregated settings and

services. These settings are highly institutionalised and have significant adverse impacts on each person's quality of life and the opportunities available to them.

The findings from the DRC offered compelling arguments for why people are drawn into segregated disability-specific settings. The Final Report recognised that people with disability and their families are systematically taught there are no safe or viable mainstream options, forcing them to access segregated settings. This can be described as 'coercive choice'.⁵ Often, people with intellectual disability are channelled from 'special' schools into an ADE; a trajectory that Catherine McAlpine, CEO of Inclusion Australia, calls 'The Polished Pathway'.⁶ Not only does this Pathway severely limit a person's opportunities and prospects for taking up meaningful valued roles, it perpetuates the underlying messages that people with disability do not belong in community, people with disability are 'lesser' than their non-disabled peers, and it is okay to devalue people with disability and treat them as second-class citizens. These messages are deeply entrenched in society and are a consequence of the legacy of institutionalisation and ongoing policies and practices of segregation and othering⁷.

It is in this context, and *because of* this context, that people with disability and their families are forced to turn to segregated disability-specific settings and services. When mainstream options continue to operate in ways that are inaccessible, exclusionary, and/or discriminatory, these options are taken away. People become exhausted and disillusioned by repeated poor and unsafe experiences and begin to perceive segregated options as 'easier' to deal with. It cannot be left to the disability community alone to shoulder the responsibility to change this reality. It requires the Federal Government to take a strong position against disingenuous claims, particularly those of sector lobbyists, that segregated

⁷ E.g. University of New South Wales (2023) [The disability royal commission delivers its findings today. We must all listen to end violence, abuse and neglect](https://www.unsw.edu.au/newsroom/news/2023/09/the-disability-royal-commission-delivers-its-findings-today--we-must-all-listen-to-end-violence-abuse-and-neglect), accessed 18 June 2025 at [https://www.unsw.edu.au/newsroom/news/2023/09/the-disability-royal-commission-delivers-its-findings-today--we-](https://www.unsw.edu.au/newsroom/news/2023/09/the-disability-royal-commission-delivers-its-findings-today--we-must-all-listen-to-end-violence-abuse-and-neglect)

options can constitute 'genuine choice'. 'Choices' made in a context where safe, high-quality, and inclusive alternatives are not available are *not* genuine choices. While the Discussion Paper does take some steps which will increase the availability of alternatives, it does not yet do enough to warrant characterising the choices it proposes as genuine.

Recommendation 1: The Department of Social Services should take a strong position against all policies and practices of segregation in employment and should publicly reject false claims that segregation can constitute a genuine 'choice'.

People with disability can and do have positive meaningful relationships with their peers who also have disability. These relationships do not constitute segregation or congregation and are not an excuse for such policies and practices. We fully support the funding of peer networks, associations, and similar, and emphasise the value of these opportunities in the lives of people with disability. There is a clear distinction between funnelling people into segregated disability-specific settings in the absence of any ordinary alternatives being available, compared to the existence of peer networks and spaces led by people with disability themselves. The latter is generally a freely chosen association that can exist among a smorgasbord of options and form only one aspect of a person's life, as opposed to being shut out of community altogether as a consequence of segregation.

Many people with various cultural heritages gather for positive community fellowship without being restricted to only learning, working, and living with people who share that particular characteristic in segregated settings. Such an approach would rightly appal most Australians. Peer networks and similar provide people with genuine opportunities to develop freely given meaningful connections and facilitate a sense of identity, belonging, value, and respect. They support the growth and mutual support that leads to self- and group-advocacy to make positive changes. However, they should also never detract from full and meaningful participation in mainstream community life. Consistent with the Disability Royal Commission's recommendation, a target of 2034 for phasing out ADEs provides direction and urgency.

Recommendation 2: Any Plan or Roadmap to guide further reform in the supported employment sector should place emphasis on the transition away from segregated employment. All public money should be invested in authentically inclusive infrastructure, services, and programs that provide the foundations for a transition to truly inclusive employment options for people with disability.

4.2. Build Mainstream Capacity to Maximise Natural Safeguards

There is ample evidence that segregated settings are more likely to enable violence, abuse, neglect, and exploitation of Australians with disability. These settings are closed off and isolated from scrutiny and connection thereby allowing abuse to occur and poor practices to fester. The NDIS Quality and Safeguards Commission's 'Own Motion Inquiry into Aspects of Supported Accommodation' provides one clear illustration of this.⁷ Formal safeguards alone are inadequate to prevent abuse from occurring – quite simply, regulators cannot be at every provider all of the time. Informal natural safeguards are critically important, yet the very nature of segregated settings actively works against the presence or development of natural safeguards, such as genuine connections and friendships with people in the community.

People are more likely to be safer when they are connected into their neighbourhood and local community. Being an active member of local community life, with the mutually valued relationships that emerge from that, is a compelling safeguard. Freely given relationships of mutual support and benefit offer the greatest protections and safeguards for us all, and it should be no different just because a person is disabled. As set out in the Model of Citizenship Support, this mutuality is termed 'Social Capital' and is critical to our life chances. The transition to new inclusive employment options should be supported through investments in strategic capacity building across mainstream settings to foster opportunities for developing natural informal safeguards.

Natural safeguards are reciprocal. Therefore, the focus cannot just be on building the capacity of people with disability to 'make friends'; attention must be given to the contexts

and conditions that create opportunities for genuine reciprocal relationships to emerge. Segregated settings do not do this. Natural safeguarding requires diverse informal relationships and community connections. Therefore, we must eliminate all forms of segregation where the context and conditions are such that they prevent the development of a diverse range of natural safeguards. We must lift our expectations about the types of lives that Australians with disability can lead and the ways that they can be enabled to take up meaningful roles in mainstream employment. We must also lift our expectations of society and ensure all Australians are better equipped and educated in order to embed attitudes and practices of inclusion across all employment settings.

Recommendation 3: The Department of Social Services should recognise the importance of informal natural safeguards in the lives of all Australians and reject policies and practices of segregation because these actively undermine the prevention of violence, abuse, neglect, and exploitation.

4.3. Ending Mutual Obligations

We share the concerns of the 2023 Select Committee on Workplace Australia Employment Services⁸, ACOSSand other anti-poverty campaigners⁹ that mutual obligation requirements are hindering, not helping, Australians with disability to enter and sustain meaningful employment according to relevant ordinary Award wages and conditions. The Select Committee, in chapter 14, described mutual obligations as “a nuclear bomb to kill a mosquito”¹⁰ The Select Committee heard international research which suggests that:

[W]hile prescriptive behavioural conditionality and sanctioning of welfare recipients is associated with short-term reductions in benefit use and an increase in the exits from benefits; it is also associated with

⁸ Chapter 14 - Mutual obligation, activation, compliance and enforcement – Parliament of Australia

⁹ [Australia’s mutual obligation system is broken. Can apologies and reviews save it from suspension? | Welfare | The Guardian](#)

¹⁰ [Ibid.](#)

unfavourable consequences over the longer term, including lower long-term earnings, lower job quality and undesirable spill-over effects on vulnerable groups, especially lone-parents, children and people with disability.¹¹

We support removing these requirements in the early stages of a person engaging with an employment support service to ensure the central focus is on achieving a genuine employment outcome rather than on administering punitive requirements. While we note that other cohorts in the community face similar challenges with mutual obligations, it must be recognised that people with disability face many barriers outside of their control in seeking employment including, but not limited to, direct and indirect employer discrimination, physically inaccessible workplace buildings and environments, and a lack of available suitable opportunities. Inclusive Employment Australia should support employers to address these barriers and support better employment outcomes for people with disability.

Recommendation 4: The Department of Social Services should commit to removing mutual obligations for people with disability which hinder the achievement of meaningful sustainable employment outcomes.

Recommendation 5: The Department of Social Services should ensure Inclusive Employment Australia supports employers to remove barriers to employment for people with disability and achieve improved employment outcomes.

4.4. Minimum Wage for All

DSS should take urgent steps to co-design a comprehensive funded transition plan to end the SWS and the Supported Employment Services Award in Australia. This does not mean closing ADEs down overnight; it means establishing a clear pathway to transition ADEs to a

¹¹ Conditions of Unemployment Series, p. [3], www.wit.ie/news/humanities/report-on-welfare-reforms-harming-our-economy-society, viewed 20 November 2023.

new business model that ends segregation and ensures that all Australians are protected by the existing mainstream minimum employment standards that apply to all other workers. We appreciate that this will require a significant shift in both mindsets and practices and, therefore, there will need to be sufficient time and appropriate government support. However, Australia should begin to transition away from this outdated model immediately.

Australia is not the only jurisdiction needing to end segregated exploitative disability employment approaches. There is a global trend to transition away from these approaches with many lessons that Australia can learn about how to approach (and how not to approach) this from the experiences in other places undergoing similar transitions. For example, many states in the United States have already started, or, in the case of Vermont, completed this transition. In September 2020, the US Commission on Civil Rights released an extensive report entitled 'Subminimum Wages: Impacts on the Civil Rights of People with Disabilities'¹² and this is but one of the international examples that we can draw on to inform policymaking in Australia.

Recommendation 6: The Department of Social Services should take urgent steps to co-design a comprehensive funded transition plan to end the Supported Work System and the Supported Employment Services Award in Australia.

The 'Guiding Principles for the future of supported employment' are vague and lack the necessary potency to drive the change that is needed to overcome the disability employment gap in Australia and to uphold the employment rights of people with disability. They are also silent on the importance of contribution to sense of wellness. People find belonging through bringing something to the table, something that underscores their human value and membership of community. We urge DSS to revisit these principles again. We believe there is a significant opportunity for strengthened Guiding Principles to play a

¹² See the report at <https://www.usccr.gov/files/2020/2020-09-17-Subminimum-Wages-Report.pdf>.

valuable role in the transition to alternative inclusive employment approaches, alongside a clear deadline to end segregated exploitative employment in Australia.

The Guiding Principles also draw attention to the problem of disguising supported employment arrangements in the fallacy that they represent 'equal remuneration and associated conditions for work of equal value'. So long as the use of productivity assessments to set wages only target one specific group of Australian workers, this simply cannot be said to be 'equal'. We are not suggesting they should apply to all workers; rather, we simply point out the absurdity of the claim to equality for a system that no other group of workers would accept. Therefore, productivity assessments should not be an acceptable way to discriminate against workers with disability.

We argue that segregated employment options must be phased out in a timely and respectful way that ensures workers are not left worse off. The Federal Government should proactively lead a national co-design process to develop a staged, timebound, transition plan that enables ADEs to implement new inclusive business models and invests in ensuring Australian workplaces become fully inclusive and accessible.

One of the benefits of codesign, when undertaken with sincerity and intention, is it brings key beneficiary voices to the table, and this can help ensure the subsequent design has the best chance of delivering good outcomes to the beneficiary group. Involvement of those voices in the decisions about design is key to this. Co-design aligns with Australia's obligations under Article 4 (3) of the United Nations Convention of Rights of Persons with Disabilities (UNCRPD). We continue to be concerned many of the processes that governments are currently referring to as co-design fall well short of best practice and do not include active involvement of people with disability in decision making. DSS may find our Guide to Co-Design with People Living with Disability, which was itself co-designed, helpful in considering the essential steps required in undertaking genuine co-design processes. It is available via our [website](#).

As mentioned in the discussion paper, the Royal Commission recommended the development of a Plan or Roadmap to guide further reform in the supported employment sector. We believe such a Plan/Roadmap should focus on transitioning away from segregation to genuinely inclusive employment options for all people with disability.

Achieving change will require a significant investment of resources and effort from all tiers of government, employers, and communities. The transition should be supported by investments in co-designed programs to address the shortfalls in mainstream employment that exclude workers with disability. Again, it must also be recognised that establishing clear timeframes for each transition stage and a final deadline is essential to ensure change occurs. For as long as segregated employment and the Support Employment Services Award continue without a deadline for transition, there will be little impetus to make mainstream workplaces inclusive.

Recommendation 7: The Federal Government should proactively lead a national co-design process to develop a staged, timebound, transition plan that supports ADEs to implement new inclusive business models and invests in ensuring Australian workplaces become fully inclusive and accessible.

5. Additional Actions to Increase Inclusive Employment

5.1. School to Work Transition Programs

Employment conversations should not be left until a person reaches working age. We believe the new Centre for Inclusive Employment (“the Centre”) can also play a role in developing good practice approaches for pathways that set up young people for employment success in the future. Individualised post-school planning for students with disability needs to start early as part of a lifecycle approach to avoid perpetuating the supported employment model and the entrenchment of poverty for further generations. Indeed, experiences at school have a long-lasting influence on the future trajectory of a person’s life. Inclusion at school is the start of inclusion in life and students who have access

to inclusive education are more likely to progress to further education and mainstream employment as adults.

Children with disability need to grow up expecting to join the workforce and should be no less likely to be asked what they want to be when they grow up than non-disabled children. This requires attitudinal change among those who have the strongest influence on children, including parents and teachers, and the Centre could play a positive role in supporting programs that achieve this outcome. The JFA Purple Orange Road to Employment project is a good example of such a program. We deliver workshops to parents and teachers at pre-school, Year 5/6 and high school levels, with the goal of 'raising the bar' on career expectations. Parents report greater understanding of the mainstream options available to their children, as well as more confidence to advocate for their inclusion. Teachers report learning new skills and approaches to inclusive education, as well as shifting their own attitudes and perceptions towards students with disability.

A comprehensive lifecycle approach to education, skills development, career goals and plans, and good practice transition support is the best way to ensure successful employment outcomes will be achieved by young people when they complete their education. The expectation of a future that includes sustainable mainstream Award-waged employment should be a feature of every child's learning and development throughout their schooling. While there is some acknowledgement of school leaver programs in the Paper, the example cited is the NDIS School Leaver Support Program. It is important for such transition programs to be available more broadly, including to young people with disability who do not meet NDIS access requirements.

Recommendation 8: The Department of Social Services should commit to a comprehensive lifecycle approach, led by the Centre for Inclusive Employment, to education, skills development, goal setting and career planning, and the transition from education to employment. This commitment should be evident in the Centre's initial resources and online hub which is due to be established in September 2025.

5.2. Inclusive Employment Australia Could Be More Inclusive

We are pleased that the Government recognised the existing Disability Employment Services model was not working. However, we are disappointed that Inclusive Employment Australia (“IEA”) was designed based on feedback from a limited consultation rather than through co-design, as recommended by the DRC. While IEA’s role in guiding employers on how to undertake workplace adjustments, job customisation and tailoring is promising, we do not believe this alone will address the shortcomings in supporting people’s individual needs or the churning of people through activities of little to no value. This requires comprehensive, co-designed reform, including to address the perverse provider payment incentives that pervade the current DES approach.

Noting the extent of barriers faced by Australians with disability in seeking appropriate inclusive employment, they must be centred in the reform process. We firmly believe a new approach to employment supports for people with disability has the best chance of success if it is informed by the insights, knowledge, and experiences of those it is intended to benefit. This requires a genuine co-design process where people with disability are involved in decision making about the best way forward. Indeed, governments and government departments should proactively consider how genuine co-design processes can enhance policy development across all areas of their work. We are concerned that many of the processes that governments are currently referring to as co-design fall well short of best practice and do not include active involvement in decision making. We encourage DSS to access our Guide to Co-Design with People Living with Disability,¹³ which was itself co-designed, via our [website](#).

Recommendation 9: The Department of Social Services should engage people with disability in a comprehensive co-design process to review Inclusive Employment

¹³ View the Guide at https://purpleorange.org.au/application/files/7416/2510/1861/PO-CoDesign_Guide-Web-Accessible.pdf.

Australia's model to ensure this will result in positive employment outcomes for people with disability and avoid negative consequences, such as the perverse provider payment incentives that pervade the current DES approach.

6. Roadmap for Sector Reform

6.1. Robust Data Collection

As DSS would be aware, the last Australian Bureau of Statistics data release for the 2022 Survey of Disability, Ageing, and Carers (SDAC) was in 2024. Such infrequent collection of relevant data adds to the challenge of designing effective policy solutions. We envisage the Centre could play a central role in increasing and improving data collection and reporting, as well as collaborating with other government agencies to ensure equality in data collection is achieved.

For example, the Centre could work with the ABS to ensure the methodology for the Labour Force Survey (LFS) evolves to include the variable of disability as soon as possible. Governments typically cite the infrequent SDAC data, most recently from 2022 as mentioned above, as the best available information regarding employment outcomes for Australians with disability. Yet, they can use regular monthly and/or quarterly LFS data for a range of other groups. Variables currently included in the LFS include age, sex, social marital status, relationship in household, family type, birthplace, year of arrival in Australia, education, and location, but not disability. We believe that the importance of understanding the labour force experiences and outcomes of Australians with disability at least matches, if not exceeds, the relevance of some of these variables in modern Australia.

Recommendation 10: The Federal Government, Department of Social Services and, once established, the Centre for Inclusive Employment should proactively pursue and fund the collection of more frequent high-quality data about the employment experiences and outcomes of Australians with disability, recognising that increased and improved data

collection is essential to maximising the opportunities and benefits of the proposed Centre.

7. Increasing Wages Without Job Losses

7.1. Current Models to Leverage

7.1.1. JFA Purple Orange's Aged Care Traineeship Program

There are a range of endeavours across Australia and overseas that are successfully supporting people with disability into sustainable mainstream Award-waged employment. The Centre should showcase proven pathways into mainstream employment, so they can be replicated and scaled up. For example, JFA Purple Orange is currently undertaking the Road to Employment (R2E) project funded by an Information, Linkages, and Capacity Building (ILC) grant from DSS. This project has demonstrated success through an industry-based approach in the aged care, finance, and local government sectors. It provides a range of initiatives to build employer confidence and capacity to employ people with disability, including mentoring, sector-based communities of practice, and disability inclusion training. Each industry working group has designed a tailored approach suitable for its circumstances. For instance, in the aged care sector, a traineeship program supported six people with disability to enter ongoing mainstream employment and complete a Certificate III level qualification.

The Centre's role in showcasing pathways should include a focus on ways people with complex disability can be assisted into employment, such as through leveraging methodologies like customised employmentⁱ and microenterprises. It must never be assumed that a person with complex disability is not capable of entering paid employment. When we imagine the possibility of employment for a person of working age, it creates a future for that person that includes employment in it. Conversely, when we do not consider this possible for the person, then that person's future has been decided for them and is bleaker as a consequence. The proposed Centre must hold true to the possibility of meaningful paid employment for all working age people living with disability and defend this principle always.

Recommendation 11: The Centre for Inclusive Employment should provide strong leadership and investment in building the capacity of employers and industries to employ Australians with disability in sustainable mainstream Award-waged roles. It should also have a strong mandate to address barriers to access and inclusion in the workforce and in workplaces, including recruitment processes, as well as to identify and showcase proven pathways that can be replicated and scaled up.

7.2. New Approaches to Test

7.2.1. Customised Employment

People with disability should have the same opportunities to choose their career path based on their individual skills, interests, and goals as all other workers. Too often we hear stories of people with disability being placed in any available job, often below their qualifications and experience, instead of utilising an individualised career planning approach. While many workers have filled gaps in their career trajectories with whatever job was available at a moment in time before moving on to something that was a better fit, this is not how their long-term career vision is formulated. There must be a greater focus on skills, not deficits, and on individually articulated goals and plans to achieve them.

We have noted with interest that a key feature of plans for a ‘just transition’ away from carbon-intensive energy production, is government investments in individualised plans for impacted workers to move into alternative employment that suits their skills, interests, and goals. For example, the Colliers Just Transition Plan of the Western Australian Government invests in individualised tailored plans that are described as meeting workers’ own individual and family needs. We strongly believe this approach merits much broader

application and should be part of a comprehensive transition plan to end supported employment arrangements and ensure workers can access pathways into suitable long-term sustainable employment outcomes.

We believe that people with disability can and do offer a diverse range of skills, talents and qualifications and with the right supports and workplace adjustments, can participate more meaningfully in the economy. To achieve this vision, we need policy directives and strategies in place to assist people with disability to seek and retain employment as valued members of mainstream workplaces. When people with disability are employed, this has flow on benefits to the workplace, our local community, and Australian society more broadly.

The presence in the mainstream labour market of employers who are ready to employ people with disability is critical for improving the quality of employment outcomes. Traditional one-size-fits-all approaches often do not support employers to employ workers with disability. Alternatively, an industry-based approach allows employers within a particular sector to come together and identify their needs and specific circumstances and design bespoke pathways that meet the needs of both the organisation and the workers. While IEA talks of guiding businesses towards tailored employment options, more clarity is required regarding how this will be applied in practice.

We do not want people with disability to continue to be exploited and forced to live in poverty with no economic security. This transition requires leadership and effective and ongoing co-design with the disability community to ensure that decisions are made in ways that do not cause unnecessary distress and harm to people with disability. We appreciate that this requires a significant shift in both mindsets and practices across Australia, however sound policy and good resources would have sway in shifting both.

Recommendation 12: The Department of Social Services should evaluate and adapt programs such as the Colliers Just Transition Plan of the Western Australian Government to the disability employment context and invest in individualised tailored plans that meet workers' own individual and family needs.

7.3. Peer Support and Mentoring

We have long advocated about the merits of ‘peer networks’, where people with disability are able to connect with each other, make sense of information, offer mutual support, and learn from each other. Peer networks often result in their members being better-informed and developing stronger ideas about their life chances and their goals. While the NDIS Review described how peer networks can facilitate ‘social and economic independence, resilience and support’²⁶, we believe the DSS should have paid further recognition to these valuable supports in the consultation paper. Importantly, peer networks can include information and discussion about community resources and opportunities, increasing the chances that people then take steps to access those resources and opportunities. This includes **peer group advocacy** if required.

Peer networks and similar initiatives support people to build belief about what is possible and to understand the potency of their own personal agency in achieving change. This is true for people with disability and for non-disabled people. For example, such networks are valuable conduits for people to access and discuss information about options and their impact, such as a network of young people meeting to discuss inclusive employment options. Across all our conversations with our peer network members, there is a very strong appreciation of the benefits of sustained funding for peer support networks to connect people to information, resources, and each other, thereby providing a natural safeguard in people’s lives. It is critical for DSS to recognise this value separate from, and in addition to, capacity building supports. There is also a strong correlation between peer network involvement and the confidence to self-advocate. Peer support networks should be an integral part of the Next Steps on Supported Employment with a recognition that they represent a very cost-effective way to provide community-based supports.

Recommendation 13: The Department of Social Services should recognise the value of peer support networks for improving the employment prospects of people with disability

and commit to long-term funding to support their operations as a separate dedicated stream from other capacity building initiatives.

8. Conclusion

Australia stands at a critical juncture in the journey toward employment justice for people with disability. The Disability Royal Commission has made clear the urgent need to dismantle outdated systems of segregation and exploitation and replace them with inclusive, rights-based approaches that value the full citizenship of people with disability. Our submission outlines a roadmap for this transition—one that is grounded in co-design, respectful of individual choice, and unapologetically ambitious in seeking equity and opportunity.

We urge the Department of Social Services to lead with courage and clarity by committing to phase out segregated employment models and invest in truly inclusive pathways. These reforms must be underpinned by robust data collection, mainstream minimum wage protections, peer-led supports, and early-life transitions that build a future where all Australians with disability can aspire to, and attain, meaningful mainstream award-waged employment.

The opportunity before us is not simply to improve the system but to transform it. By doing so, we will honour the aspirations of the Disability Royal Commission, the commitments Australia made under the UN Convention on the Rights of Persons with Disabilities, and, most importantly, the rights, hopes, and contributions of people with disability across the country.