
- Direct support to people with disability across learning, work, and community life
- Accredited education

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- LGBTIQ+ inclusion for people with intellectual disability
- accessible civic participation
- co-designed resources
- training and policy

Part 1: Reflections on the Guiding Principles and Future Design

The consultation paper outlines an intention to create "an inclusive employment system where all people with disability, including those with high support needs, have equal access to opportunities for meaningful and sustainable employment". [REDACTED] supports this ambition and endorses the guiding principles listed in Appendix 2 (page 18) of the discussion paper, including:

- Upholding human rights and the dignity of risk
- Strengthening the capability of people with disability and those who support them
- Promoting fair, transparent and sustainable funding models
- Supporting choice, control and person-centred approaches
- Improving system alignment, integration and coordination
- Enabling continuous improvement and innovation

However, our experience shows that these principles have not yet been systematically applied across funded systems or programs due to substantial gaps between the Government's vision and current delivery mechanisms.

Although the paper highlights the importance of whole-of-system collaboration, people with intellectual and cognitive disability remain subjected to disconnected pathways between school, VET, DES, ADEs, and NDIS planning. While the importance of "informed decision-making" is repeatedly highlighted, the Supported Decision Making practices used in DES and ADE pathways rarely reflect key benchmarks (which in many cases function as the legal minimum standard for decision-making support, particularly for people with guardianship arrangements) such as the Australian Law Reform Commission's (ALRC) National Decision-Making Principles or the NDIS SDM Policy which is based on the ALRC Principles.

Consent and agency are vital elements of a vocational journey — understood here as a guided yet flexible path of experiences, commitments, and capacity building that unfolds over time and leads to a sense of contribution, fulfilment, and personal financial outcomes. These concepts are also central to the idea of a *career* — a term rarely afforded to people with intellectual and cognitive disability, yet fundamental to how the general population makes sense of working life. Consent and agency distinguish true career journeys from experiences that fall short, such as:

- Work or vocational training that is chosen by others and may be unfulfilling, unrewarding, exploitative, or psychologically harmful to the worker with intellectual or cognitive disability.

- A series of disconnected or static ‘jobs’ that cannot reasonably be seen to form a career.
- Work or training pathways that are partially or wholly segregated based on disability or perceived capacity, in situations where the person’s will and preference — if elicited through supported decision making — may have been for inclusive, non-segregated environments.

It is not surprising that consent and agency are also foundational to Supported Decision Making. It is Inclusion Melbourne’s view — informed by many years of experience, observation, and leadership in disability practice — that the benefits historically associated with siloed, segregated employment models are now mostly overshadowed by their costs. These costs include diminished quality of life, poor mental health (including distress that leads to communication labelled as ‘behaviours of concern’), high risk of exploitation, and a lack of engagement and capacity development that occurs when a person is shoehorned into thousands of hours of activity that does not align with their personality, skills, or life goals. (However, we do note that some disability-specific supported employment programs may hold potential as time-limited stepping stones on a carefully planned, person-centred vocational journey. We will discuss this further in Part 3.)

The ALRC’s National Decision-Making Principles (2014) emphasise that all people should be presumed to have decision-making ability, be supported to make their own decisions, have their will and preferences respected, and have safeguards that promote and protect rights and dignity. In our experience across disability education and employment systems, these principles are often misunderstood or bypassed—particularly for people with complex communication needs. For example, the over-reliance on verbal interviews or unsupported tick-box assessments can lead to inadequate outcomes and reinforce low expectations.

The idea of “opportunities to learn and upskill” is also undermined by persistent structural issues within the corners of the VET system targeted at learners with intellectual and cognitive disability. These programs often apply adult education principles in a superficial or tokenistic way. Vocational training is frequently reduced to compliance content, limited (or excessive) repetition, or task-focused routines with little linkage to real-world employment or a broader learning journey. Trainers are often not equipped with the tools or preparation required to scaffold skill development, build vocational confidence, or support decision making. In most jurisdictions, despite arduous AQTF compliance and auditing processes, there is no robust monitoring of the application of evidence-based practices for this cohort, meaning many programs are not truly accountable for the role they play in broader disability employment policy. Without structural reforms that embed developmental, person-centred pedagogy and require accountability across providers, the desired inclusive employment-focused VET outcomes will remain aspirational.

Workforce development must also include targeted investment in upskilling and training key supporters in a person’s employment journey. Many disability support workers, DES staff, VET trainers and employers have limited training in providing active support, graded assistance, building vocational confidence, or facilitating supported decision-making.

The new supported employment framework must invest in building the capacity of the workforce surrounding the person — ensuring that supporters, coordinators, and employers understand their role in supporting decision-making, mitigating risks to achieving outcomes, and fostering progression across an employment journey. This must be underpinned by efficient, incisive measurement, with equally efficient and incisive regulatory tools that track not just service outputs, but real participant journey over time.

Employment (and career) goals and aspirations are often constrained not by a person’s capacity, but by systemic failures to support vocational imagination. Many people with intellectual or cognitive disability have never been supported to understand what jobs exist, how workplaces function, or what

career pathways might align with their skills or interests. These gaps are not simply about information — they reflect deep inequities in cognitive access. Policies and funding models must enable the development and use of accessible tools, career exploration activities, and scaffolded learning experiences that introduce diverse sectors, environments, and roles in meaningful and affirming ways.

Employment should not be separated from a person's broader life context. Participation in work is shaped by social, emotional, and relational factors — including past trauma, identity and self-concept, sense of safety, confidence, and prior support experiences. Too often, employment planning ignores these dimensions and treats the person only as a potential economic participant. Tools and systems that support employment must instead recognise the whole person and respond to the unique ways in which life experiences inform a person's readiness, engagement, and wellbeing in work.

Part 2: Systemic Challenges and the Need for Structural Reform

The consultation paper rightly outlines a future direction that includes:

- better long-term planning
- more appropriate options for vocational pathways
- incorporate supported employment approaches that may be currently dismissed by a range of advocates as automatically inappropriate
- more appropriate rules for people who receive the disability support pension

Our experience affirms the need for these things. We highlight the following key systemic issues:

1. Fragmentation and Poor Integration

Employment services are siloed. For example, a student completing Certificate I in Work Education may have no structured link to DES providers, JobAccess funding (via the Employment Assistance Fund), or workplace environments. JobAccess provides important workplace modifications and employer supports but is often absent from planning conversations. Eligibility complexity and lack of integration reduce its impact. DES remains highly variable in quality, with providers not being incentivised to focus on people with high support needs, long-term pathways, or consultation with the broader support network around a person. Many place participants in short-term, mismatched roles.

While JobAccess plays an important role in funding workplace modifications and providing employer guidance, there is currently no mechanism to measure or evaluate outcomes at the individual employer level. Funding is often provided without structured follow-up, making it difficult to assess whether modifications are used effectively, whether employees with disability remain in their roles, or whether the broader workplace culture has shifted. The lack of data on site-specific outcomes weakens the system's capacity to drive continuous improvement or target interventions. JobAccess could be significantly strengthened by embedding outcome monitoring tools and requiring short follow-up assessments on inclusion and retention metrics at the funded workplace.

2. Tokenistic or Misapplied Supported Decision Making

Although the consultation paper highlights the principle of informed decision-making (Appendix 2) and the recent release of the NDIS Participant Employment Strategy 2024-2026, SDM is inconsistently applied across supported employment systems. Many assessments exclude trusted supporters or fail to acknowledge complex communication needs. We frequently encounter circumstances where

participants are funnelled toward ADEs or unpaid placements without exploration of alternative environments. This contradicts the principle that SDM must enable people to develop and express their own work goals in their own way, using a range of communication supports. Monitoring must go beyond employment status to include the nature of the work, diversity of tasks, support levels, and actual skills growth. A person-centred framework must detect false transitions, such as when roles move into open employment on paper but without real growth or independence.

3. Lack of Longitudinal Planning and Capacity Metrics

There is no shared model for understanding and tracking vocational capacity over time. Many people with intellectual and cognitive disability cycle through VET, DES, or day services without documentation of what has changed or developed. Placement decisions often prioritise stability or risk avoidance, resulting in participants being retained in static, low-paid roles for years without progress. The system must embed an understanding of employment as a developmental journey, not a binary job outcome. Each placement must be part of a time-limited and monitored plan that supports onward movement — even if sideways at times — toward broader, deeper capacity.

Within the current NDIS pricing framework, funded employment supports typically align with three staffing categories: entry-level disability support workers (around \$60/hour), more experienced practitioners (\$70/hour), and registered counsellors or therapists (at significantly higher rates). However, there is no designated pricing tier for a vocational design and planning coach — someone capable of tracking a person's employment journey across programs, systems, and life transitions. This is a critical omission. People with intellectual and cognitive disability often need coordinated, rights-based employment support that can map sector options, build placement plans, and interpret assessment data to inform sustainable vocational decisions. The absence of such a role — and the corresponding line item — limits what can be delivered under NDIS plans. A pricing category equivalent to or slightly above a support coordinator is needed to support this specialised workforce.

4. Persistent Risks in Workplace Settings

We wish to note our disappointment that the Discussion Paper did not address the needs of LGBTIQ+ workers. [REDACTED] identified high rates of exclusion and harassment for LGBTQ+ people with intellectual disability in workplace settings. Workers were often bullied or isolated by peers (with and without disability), particularly in ADEs or segregated supported employment. Many workers were targeted based on gender expression or perceived sexuality, and most did not know where or how to report such incidents. These risks are not formally assessed in DES intake processes, ADE audits, or VET-to-work transition plans, and there is no national resource that contextualises disability, sexuality, and workplace inclusion.

5. Continued Use of Sub-Minimum Wages

While we recognise the role some supported employment settings play in building work readiness, any model that allows ongoing sub-minimum wage must include structured capacity building goals, pathways to award wage transitions, and independent review mechanisms. This is not currently guaranteed. Wage subsidies and employment funding often support maintenance rather than growth.

6. Unpaid Work and False Progression

Some programs, particularly VET and “work readiness” offerings, involve repeated unpaid placements that lack authentic progression. Unpaid placements should be capped and should only occur where they contribute meaningfully to skill acquisition or exploration and are embedded in a robust supported decision-making process.

7. Stagnation and Low Expectations

As flagged in our internal practice reviews and presentation materials, many people become 'stuck' in roles that do not build capacity or reflect their interests. These placements are often rationalised as 'safe' or 'stable' without adequate review. Every supported employment offering must include a progression plan, and external accountability mechanisms should detect when people are being warehoused or looped in stagnant placements.

We invite DSS to:

- Fund research and review mechanisms that track participant journeys and progression over time
- Incentivise the development and adoption of tools that bring the Guiding Principles into real-world use
- Work more closely [REDACTED] to devise improved, integrated measurement tools with clever indicators that could apply across the sectors and programs outlined above and prioritise a journey-focused, capacity building approach.

Part 3: Responding to Structural Gaps [REDACTED]

The issues outlined above led [REDACTED] to design [REDACTED] a solution to observed systemic failures in current employment pathways for people with cognitive disability.

[REDACTED] planning and assessment framework built from the ground up. It has been co-designed with people with disability, piloted across education and employment contexts, and is underpinned by years of support practice and applied research. The design [REDACTED] drew on [REDACTED] experience in VET delivery, workplace matching, positive behavioural support, and inclusive communication.

[REDACTED]

- Allows for a carefully devised, [REDACTED] Report to be produced for each participant following a completed [REDACTED] Assessment. The [REDACTED] Report outlines a [REDACTED] vocational capacity-building journey [REDACTED]
- Identifies a vocational capacity-building **journey** for participants that includes either 3 or 4 work placements and can be completed in between 2 and 4 years, with the journey being scaffolded with clear capacity building goals, guidance for the type of sector, role and workplace environment types, and key strengths and considerations. The aim of the capacity-building journey period is to develop a substantially clearer picture of the person's vocational skills and aspirations, while identifying and addressing critical gaps in vocational capacity.
- The [REDACTED] Report can be used by a range of supporters and professionals in the person's life to ensure an all-hands-on-deck approach to (a) seeking the right opportunities, (b) capacity building, and (c) preventing the person from getting 'stuck' along the way.

The [REDACTED] introduces a Level Guide (A to F) that maps the range of skills, support needs, and workplace experiences required to move toward sustainable, valued employment. The multi-placement approach and clear boundaries allow for disability-specific supported employment programs to become potential options for one or two placements [REDACTED] if

the person is at some of the lower levels of the Level Guide, while providing guidance for supporters who wish to pursue customised employment arrangements.

The language used in [REDACTED] Reports was developed to be flexible and usable across multiple systems — including DES, NDIS-funded supports, schools, social enterprises, and mainstream employers. It is designed to be intelligible to support workers, educators, family members, planners, and employers alike. This was intentional. Too many existing frameworks rely on technical language or assume a shared understanding between systems that does not exist in practice.

This report is shared with the participant and their support network, enabling employers, DES providers, and educators to operate from a shared framework. The current [REDACTED] platform is under development [REDACTED] It will enable wider implementation, automated matching, and report integration across services.

[REDACTED] addresses the specific challenges outlined in this submission:

- It uses a **journey** focused approach.
- It **embeds capacity building** into all stages of vocational participation
- It ensures **Supported Decision Making** is operationalised through multiple choice formats, visual prompts, and supporter-enabled responses
- It supports inclusive placement matching by identifying environmental considerations, psychosocial risks, and support needs
- It enables monitoring of progression and detection of false transitions, by identifying nature of tasks, level of support, and trajectory of capacity growth

[REDACTED] a mature, tested, person-centred and rights-aligned model that shows what structural integration and accountable progression can look like in practice.

We invite DSS to:

- Support structured trials embedding [REDACTED] concepts into DES, JobAccess, and Inclusive Employment Australia initiatives.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]