

**Disability Employment
Centre of Excellence
Options Paper October 2023:
A joint submission from Disability
Representative Organisations**

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Acknowledgements and style note

The authors, organisations and individuals supporting this submission acknowledge the Traditional Owners of the lands on which this submission was developed.

The organisations contributing to this submission acknowledge all the individuals who lent their time and expertise to its development. This submission would not have been possible without these efforts.

This submission is written in person first language (i.e., person/people with disability) to match the language commonly used by the Australian Government. We note as to language that the disability community has largely recognised and used inclusive language and terminology for decades. We also recognise that many young people with disability, in particular, those from the autistic community, choose to use identity-first language (e.g., disabled person). These terms may therefore be used interchangeably throughout this submission.

The submission was prepared with the assistance of Disability Representative Organisations (DROs) and the Coordinator, National Coordination Function for DANA. We thank the DROs who contributed to this submission:

- Australian Federation of Disability Organisations
- Children and Young People with Disability Australia
- Disability Advocacy Network Australia
- Down Syndrome Australia
- First Peoples Disability Network
- Inclusion Australia
- National Ethnic Disability Alliance
- People with Disability Australia
- Women with Disabilities Australia

We acknowledge the significant contributions made by Inclusion Australia and Children and Young People with Disability Australia to the content of this submission.

Signatories to this submission

The following organisations endorse this submission:

- Australian Federation of Disability Organisations
- Children and Young People with Disability Australia
- Disability Advocacy Network Australia
- Down Syndrome Australia
- First Peoples Disability Network
- Inclusion Australia
- National Ethnic Disability Alliance
- People with Disability Australia

Introduction

DROs and other individuals and organisations supporting this submission welcome the opportunity to provide feedback on the Options Paper 'Establishing a Disability Employment Centre of Excellence.'

This submission responds to the four key areas of consultation questions posed by the Options Paper:

1. Why do we need a Centre?
2. Who could the Centre assist?
3. What models exist?
4. What are the next steps towards implementation?

There has been significant previous consultation discussions and submissions that have recommended the formation of Disability Employment Centre of Excellence (the Centre). This submission expands upon the common themes as outlined in the Options Paper. Our vision of the Centre focuses on:

- It being led by people with disability, particularly people from groups that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability;
- Its work being shaped by the expertise and lived experience of people with disability;
- Reflecting the diversity and intersection of people with disability from diverse backgrounds;
- Incorporating a First Nations cultural model of inclusion and building on the principles of Closing the Gap National Agreement;
- Providing specialised support for groups most impacted by barriers to economic inclusion;
- Building evidence-informed best-practice tools and resources that are accessible and available to all people with disability;

- Creating and consolidating resources and training to improve all employers' capacity, confidence and competence in inclusive employment (including communities of practice for employers);
- Consolidating data and improved data collection methods and establishing common metrics for measuring progress;
- Establishing an accountable and independent mechanism to drive change through monitoring outcomes and evaluation; and
- Incorporating communities of practice that centres the experience of people with disability.

These key themes guide our responses to specific consultation questions and key recommendations. This submission sets out our discussions as follows:

- Why do we need a Centre? [Question 1.1]
- What should be the model for the Centre? [Questions 3.1 - 3.3]
- Where could a Centre be best placed? [Question 4.1]
- What should be the core functions of the Centre? [Question 1.2]
- Who can the Centre assist? [Question 2.1]
- How can the Centre work with stakeholders to achieve its purpose? [Question 2.2 - 2.3]
- What elements of the proposed role of the Centre or its functions should be prioritised? [Question 4.3]
- Are there any other implementation issues that should be considered? [Question 4.2]

This submission has been made by these organisations based on their collective expertise and experience, coordinated by the National Coordination Function (NCF). Many individuals who contributed to this submission bring their own lived experience of disability. However, the timelines for this consultation did not enable comprehensive consultation with the broader membership of these organisations nor the wider community of people with disability. Working with people with disability and DROs should be a key feature of establishing a Disability Employment Centre of Excellence (the Centre).

Each of the organisations involved in this submission recognise the significant opportunity that establishing the Centre will have in improving the economic inclusion of people with disability. We look forward to continuing to work with the Department of Social Services to establish the Centre with people with disability.

List of recommendations

Recommendation 1

The reasons for the Centre articulate the important opportunities for the Centre to improve the quality of outcomes as follows:

- Improving employment outcomes for all people with disability;
- Improving the capacity, confidence and competence in inclusive practices for all employment service providers and employers; and
- Creating opportunities for people with disability to lead and shape employment reforms through expertise and lived experience, particularly people from groups that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability.

Recommendation 2

The Centre model embeds:

- Leadership by a person or people with disability, particularly people from groups that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability;
- Meaningful disability representation at all levels, including representation from groups that are most impacted by barriers to economic inclusion such as people with an intellectual disability, First Nations people and young people with disability;
- Co-design throughout all stages of the Centre including its development, implementation, and monitoring and evaluation;
- Accountability and independence that drives reform, including monitoring outcomes and evaluation;
- Centralised evidence-informed best-practice tools and resources for increasing inclusive employment;

- Specialised support for specific groups of people with disability that includes specific training and peer-to-peer support relevant to different intersectional communities;
- Cultural Model of Inclusion Framework and the principles of the Priority Reforms of Closing the Gap National Agreement be applied during the development, design and evaluation of the Centre, including specific engagement with FPDN and the First Nations people with disability to implement the framework.

We support a statutory model because we believe this would provide the most accountability and independence in the long term. In lieu of a statutory agency, a combined research centre/evidence-based training hub model is the strongest model to implement targeted reform in the short term.

The model for the Centre is codesigned in consultation with people with disability to facilitate a shared understanding and consensus about what model the Centre should take.

People with disability be provided with clear information in accessible, inclusive formats, that clearly explains what the different models would look like, so that people with disability can make informed decisions about which model is most fit for purpose.

Recommendation 3

The Centre's core functions focus on significant employment reforms, led and shaped by people with disability to improve outcomes for economic inclusion by ensuring that the Centre is:

- Led by people with disability, particularly people from groups that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability;
- Its work is shaped by the expertise and lived experience of people with disability;

- Reflects the diversity and intersection of people with disability from diverse backgrounds;
- Incorporates a First Nations cultural model of inclusion;
- Provides specialised support for groups most impacted by barriers to economic inclusion;
- Builds evidence-informed best-practice tools and resources that are accessible and available to all people with disability;
- Creates and consolidates resources and training to improve all employers' capacity, confidence and competence in inclusive employment (including communities of practice for employers);
- Consolidates data and improves data collection methods and establishing common metrics for measuring progress;
- Establishes an accountable and independent mechanism to drive change through monitoring outcomes and evaluation; and
- Incorporates communities of practice that centres the experience of people with disability.

The Centre's core functions are codesigned in consultation with people with disability to facilitate a shared understanding and consensus, including the provision of clear information in accessible, inclusive formats.

Recommendation 4

The Centre should specifically identify in its purpose and functions to provide specialised support and deliver good outcomes to people with disability from diverse backgrounds and with a variety of disability. Co-design should consult specifically with groups that are most impacted by barriers to economic inclusion, including young people with disability transitioning from school to employment, people with intellectual disability, and those from CaLD (Culturally and Linguistically Diverse), First Nations and regional or remote communities.

Recommendation 5

The Centre should establish links and partnerships that leverage existing services, networks and experts, including people with disability (including experienced self-advocates) and their supporters, including but not limited to relevant research bodies and academics, advocates and advocacy organisations; Disabled People's Organisations and DROs.

Recommendation 6

A communication plan needs to be implemented so that people with disability are kept informed and updated throughout the design and implementation processes of the Centre.

Recommendation 7

The proposed name of the Centre, "Disability Employment Centre of Excellence" be reviewed through consultation with people with disability.

Response to consultation questions

Why do we need a Centre?

[Question 1.1]

As the Options Paper points out, the unemployment rate for people with disability has not shifted in more than two decades. The labour force participation rate for people with disability has remained largely unchanged from 2003 (53%) to 2018 (53.4%).¹

Statistics demonstrate the profound gaps in employment for people with disability compared to people without disability. People with disability experience a rate of unemployment three times that of people without disability, with 53.4% of people with disability of working age were in the labour force (compared with 84.1% of those without disability). Labour force participation declined with the severity of limitation (27.2% for those with profound or severe limitation).²

There are important intersections to consider when understanding the employment gaps and systemic barriers people with disability face. Despite spending \$1.4 billion on 108 Disability Employment Service (DES) providers³ young people with disability

¹ Australian Bureau of Statistics (2004), *Disability, Ageing and Carers, Australia: Summary of Findings, 2003* (Catalogue No. 4430.0, 15 September 2004), <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>; Australian Bureau of Statistics (2019), *Disability, Ageing and Carers, Australia: Summary of Findings, 2018* (Catalogue No. 4430.0, 24 October 2019), <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>.

² Australian Bureau of Statistics (2019), *Disability, Ageing and Carers, Australia: Summary of Findings, 2018* (Catalogue No. 4430.0, 24 October 2019), <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>.

³ Australian Government Department of Social Services (2021), *Shaping your new disability support employment program: Consultation Paper* November 2021, 5, <https://engage.dss.gov.au/wp-content/uploads/2021/11/Consultation-Paper-New-Disability-Employment-Services-Model.pdf>.

are disproportionately represented in unemployment and underemployment statistics. Twice as likely as their same aged peers without disability to be unemployed and three times more likely than people with disability in the 25–64-year-old age group, young people with disability are disenfranchised from the labour market⁴ First Nations people aged between 25-54 with disabilities are 17.4% less likely to be in the labour force than those with no disability conditions.⁵

People with an intellectual disability are among the most marginalised when it comes to employment, with only 39% of people with an intellectual disability in the labour force (including people looking for work).⁶ Australia has one of the lowest employment participation rates for people with an intellectual disability in the OECD.⁷

Approximately 16,000 people with disability, most of whom have an intellectual disability, are employed in around 477 ADEs across Australia.⁸ Currently, ADEs pay as little as \$2.36 per hour for work under the Supported Wage System and \$3.50 per hour under the Fair Work Commission findings.

The Australian Bureau of Statistics revealed that:

⁴ Australian Government Australian Institute of Health and Welfare (AIHW) (2022), *People with Disability in Australia 2022*, <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/employment/unemployment>.

⁵ Dinku Y & Hunt J (2019), Factors associated with prime-age Indigenous labour force participation, Working Paper 131/2019, Centre for Aboriginal Economic Policy Research, Australian National University, Canberra. DOI: 10.25911/5dc3e4d902d9d, 8, <https://openresearch-repository.anu.edu.au/handle/1885/183382>.

⁶ Australian Bureau of Statistics (2019), *Disability, Ageing and Carers, Australia: Summary of Findings, 2018* (Catalogue No. 4430.0, 24 October 2019), <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>.

⁷ Wilson, E. and Campain, R. (2020) *Fostering employment for people with an intellectual disability: the evidence to date*, Hawthorn, Centre for Social Impact, Swinburne University of Technology.

⁸ Wilson, E.; Qian-Khoo, J.; Cutroni, L.; Campbell, P.; Crosbie, J. & Kelly, J. (2022). *The ADE Snapshot, Explaining the Evidence for Reform Series*. Hawthorn: Centre for Social Impact.

- People with an intellectual disability were less likely to be employed full-time (12%) than people with other types of disabilities (32%) and the population without disability (55%);
- Around 34% of people with an intellectual disability found it difficult changing jobs or getting a preferred job; and
- About 38% felt they were restricted in the type of job they could get.⁹

Data published by the NDIA in December 2019 on type of paid employment for participants with intellectual disability shows that for participants aged 25 and over, 15% are in open employment with full award wages, 13% are in open employment with less than award wages and 72% are employed in ADEs. Younger NDIS participants with intellectual disability (aged 15-24) are far more likely to be in open employment (on part or full wages) than employed by an ADE.¹⁰

There is also an understanding, and body of supporting evidence, that systemic reform can create a meaningful and sustained improvement in the economic inclusion of people with disability.¹¹ Proposed goals for reforms relating to people with intellectual disability include the following elements:

1. A non-segregated employment support system: equal access to all employment services;

⁹ Australian Bureau of Statistics (2019), *Disability, Ageing and Carers, Australia: Summary of Findings, 2018* (Catalogue No. 4430.0, 24 October 2019), <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>.

¹⁰ National Disability Insurance Agency (NDIA) (2019), *People with an intellectual disability in the NDIS*, 35, <https://data.ndis.gov.au/reports-and-analyses/people-intellectual-disability-ndis>.

¹¹ Wilson, E., Qian-Khoo, J., Crosbie, J., & Campbell, P. (2022). *The Logic for Reform: Employment for People with Intellectual Disability in Australia, Explaining the Evidence for Reform Series*. Hawthorn: Centre for Social Impact, <https://apo.org.au/sites/default/files/resource-files/2023-03/apo-nid321816.pdf>, DOI: 10.25916/53n8-4a80.

2. Employment supports and services that directly address the full range of (biopsychosocial) barriers to employment; and
3. Evidence based and effective employment supports for people with intellectual disability.

People with disability are also very likely to experience discrimination in the workplace, with nearly half (45.2%) of all employed people with disability reporting they had experienced “unfair treatment or discrimination” from their employer in the past 12 months.¹²

The attitudes and systems that exclude people with disability from equitable, inclusive employment and economic opportunity are well evidenced and understood.¹³ The Evaluation of the Australian Human Rights Commission ‘IncludeAbility’ project, 2020-2023,¹⁴ included key findings that:

- ‘Barriers to employment for people with disability in large organisations are complex and relate to the operating environment of each particular organisation’;
- ‘Organisations require long term, sustained support to build their disability confidence and create employment opportunities for people with disability’;
- and

¹² Australian Human Rights Commission (IncludeAbility). N.d. *Disability and employment in Australia*, https://includeability.gov.au/resources-employers/disability-and-employment-australia#_ednref21.

¹³ Inclusion Australia and People with Disability Australia (2022) *Wage equity and more choices in employment for people with an intellectual disability: Research review April 2022*, <https://pwd.org.au/wp-content/uploads/2022/04/ADE-research-brief-April-2022.pdf>.

¹⁴ Crosbie, J. & Wilson, E. (2023). *Evaluation of the Australian Human Rights Commission ‘IncludeAbility’ project 2020-2023. Key Findings*. Centre for Social Impact, Hawthorn, <https://assets.csi.edu.au/assets/Final-Report-AHRC-IncludeAbility.pdf>.

- ‘Overwhelmingly, IncludeAbility participants identified that attitudinal and organisational barriers result in people with disabilities being excluded from workplaces.’

A project similar to the ‘IncludeAbility’ project demonstrates the role that disability advocacy organisations can play in assisting people with disability and employers. The project led by Down Syndrome Australia has seen 57 people with Down syndrome placed and supported into open employment. This project is currently being externally evaluated by the Centre for Social Impact at Swinburne University.

One story of success has seen ACT Down Syndrome Association (ACTDSA) support Kura, a young man with Down syndrome, to obtain employment with a local employer, GoBoat. The role that was advertised was customer service with the plan that as the employee grew more confident, more hours would be offered, and the role tailored. ACTDSA provided extensive support to GoBoat to prepare for Kura’s start and GoBoat staff were provided with training in Easy English to create task cards. GoBoat’s training and expectations of their employee has gone above and beyond the expectations of the role. Kura is now completing all customer service tasks, including assisting customers to dock their boat which includes turning and tying the boat independently. GoBoat are now able to cater to a wide variety of customer needs, and Kura has developed not only employment skills but life skills that he will take with him.

The Options Paper articulates part of this background and the need for a Centre from the perspective of **increasing** employment outcomes for people with disability and the capacity of employment services providers. However, we believe that the reasons we need a Centre would be more powerful if framed using qualitative language, that is, “improving” instead of “increasing”. The reasons would also be strengthened by explicitly stating that the Centre’s purpose is to assist all people with disability, employment service providers, and employers.

Leadership by people with disability and shaped by expertise and lived experience of people with disability

The Centre must be led by people with disability, shaped by expertise and lived experience of people with disability, and reflect the diversity and the intersectional experiences of people with disability from diverse backgrounds.

This includes the role of people with intellectual disability, who have historically been excluded from the labour market, in driving much-needed employment reforms through the Centre. The Centre should create mechanisms for people with an intellectual disability to lead change, including representation in its leadership and employment throughout the organisation.

Research commissioned by the Disability Royal Commission clearly demonstrates that disability leadership is one of the biggest facilitators for shifting community attitudes towards people with disability, along with:

- The active presence of diverse people with disability across all life domains;
- Leadership by people with disability across government, media, business and community;
- Targeting multiple levels and multiple types of policy and intervention in a holistic approach to system change;
- Long-term approaches with adequate resourcing; and
- Measuring, monitoring and research to inform decision-making and accountability.¹⁵

The research suggested that the most important interventions to shift attitudes are those that create visibility of people with disability across the community and meaningfully value their insights, expertise and lived experience by creating opportunities for leadership.

¹⁵ Idle, J., Giuntoli, G., Fisher, KR, Robinson, S., Purcal, C., Newman, C., Reedy, K. (2022). *Research Report – Changing community attitudes to improve inclusion of people with disability*. Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. Retrieved from: <https://disability.royalcommission.gov.au/publications/research-report-changing-community-attitudes-improve-inclusion-people-disability>. Page 53-57.

People with disability—and particularly people with an intellectual disability—have experiences of the social security system, employment services, and related supports that are unique. Because of the range of intersectional identities among people with disability as a group, many within this community experience the compounding impacts of these systems, and therefore have knowledge of them from a range of important perspectives.

Disability-led leadership will ensure the Centre is fit for purpose and has the targeted impact needed to overcome the entrenched systemic and attitudinal barriers that continue to shut people with disability out of equitable, inclusive employment. This is well-aligned with government priorities through the Employment White Paper and Australia’s Disability Strategy.

Sharing power with people sometimes referred to as ‘experts by experience’¹⁶ is rare across social change innovations, and research shows excluding them from decision-making remains common.¹⁷ Many people with disability still have very few accessible and equitable ways to share ideas with government or to meaningfully shape and lead policy and program design. Too often, people with disability and their families are relegated to the role of ‘informant’ rather than leaders of change, and remain undervalued and distrusted as agents of expertise and innovation.¹⁸

Internationally there is a growing body of research that demonstrates not only the benefits, but the *necessity* of including (and appropriately supporting and

¹⁶ Experts by experience are defined as people “on whom a social issue, or combination of issues, has had a direct impact ... and who seek to use their lived experience to drive and lead social change”. Sandu, B. (2017). *The Value of Lived Experience in Social Change: The need for leadership and organisational development in the social sector*. Retrieved from: <https://thelivedexperience.org/wp-content/uploads/2017/07/The-Lived-Experience-Baljeet-Sandhu-VLE-full-report.pdf>.

¹⁷ Sandu, B. (2017). *The Value of Lived Experience in Social Change: The need for leadership and organisational development in the social sector*. <https://thelivedexperience.org/wp-content/uploads/2017/07/The-Lived-Experience-Baljeet-Sandhu-VLE-full-report.pdf>.

¹⁸ *Ibid.*, 20-23.

renumerating) experts by experience to create lasting social change. Evidence demonstrates that this leads to:

- Strengthening the legitimacy and accountability of social purpose work;
- Improving the effectiveness of existing, and developing new, services and social change initiatives;
- Increasing organisational capacities through the development of peer support;
- Inspiring innovation and reinvigorating activities;
- Building relationships and trust with communities, increasing the reach, leverage and traction of activities and generating social capital;
- Breaking down organisational hierarchies and avoiding stagnation;
- Enhancing community cohesion and cultivating effective partnerships, action and collaboration; and
- Allowing innovation to flourish.¹⁹

The expertise, experience and skillsets of people with disability and their supporters in relation to economic inclusion, are central to the Centre's success and continuous improvement.

People with disability hold profound and multifaceted expertise about inclusive employment—and the barriers to achieving it—that is arguably unmatched by any formalised, institutional body currently existing in Australia. The hard-won expertise, experience and skillsets of people with disability and families in relation to economic inclusion must be appropriately harnessed, equitably remunerated, and understood and valued by government as central to the Centre's success and continuous improvement by the Centre:

- Being led by a person or people with disability and there being meaningful disability representation from diverse backgrounds at all levels;

¹⁹ Ibid., 17.

- Ensuring a majority of positions are held by people with disability, with significant representation of people with disability from groups that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability;
- Embedding mechanisms to ensure the leadership and representation of people with disability, and support this through its structural policies and procedures; and
- Creating formal governance mechanisms that include at least an advisory committee, periodic reporting and formal consultation mechanisms to engage with people with disability, Disabled People’s Organisations, and representative organisations for people with disability.

As such, we firmly believe that in designing the Centre, people with disability and their supporters should not be seen only as informants, consultants, or indeed recipients of the Centre’s functions, but rather their leadership as strategic and fundamental to the Centre’s purpose, and crucial to changing negative attitudes and low expectations of people with disability within the community.

We recommend that the purpose of the Centre reflect the need to create opportunities for people with disability to lead and shape employment reforms through expertise and lived experience, particularly people from groups that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability.

Recommendation 1

The reasons for the Centre articulate the important opportunities for the Centre to improve the quality of outcomes as follows:

- Improving employment outcomes for all people with disability;
- Improving the capacity, confidence and competence in inclusive practices for all employment service providers and employers; and

- Creating opportunities for people with disability to lead and shape employment reforms through expertise and lived experience, particularly people from groups that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability.

What should be the model for the Centre?

[Questions 3.1 - 3.3]

The Options Paper sought feedback on several proposed models (Research Centre Model; Clearinghouse Model; Evidence–Informed Training Hub; Statutory Agency), alternative models not considered, and learnings from existing models.

We have heard from our communities that more information—in accessible, inclusive formats—is needed to reach a shared understanding and consensus about what model the Centre should take.

The most important elements to consider in formulating the model of the Centre are reflected in the key themes identified below.

Leadership by people with disability and shaped by expertise and lived experience of people with disability

The Centre must be led by a person or people with disability and have significant representation of people with disability from diverse backgrounds. The Centre particularly needs representation from groups that are most impacted by barriers to economic inclusion. The model of the Centre must incorporate the insights, expertise and lived experience of people with disability, particularly people that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability.

Cultural model of Inclusion

First Peoples Disability Network (FPDN) recommends that the model of the Centre incorporates the cultural model of inclusion framework, which ensures cultural safety, inclusion and rights-based models. It also recommends that the Centre build on the Priority Reform principles of the Closing the Gap National Agreement. Applying an inclusion and disability lens through the priority reforms, this will ensure First Nations people with disability will have:

- A greater say in how policies and programs are designed and delivered within the Centre;
- Access to community-controlled services and sectors that delivers culturally safe, accessible and inclusive, and disability right informed services;
- Access to mainstream organisations and services, such as employment services, education and government agencies, that are culturally safe, trauma informed, accessible and inclusive, and disability right informed; and
- Access to, and the capability to use, locally relevant, First Nations disability informed, data and information.

A cultural model of inclusion recognises the diversity of cultures, languages, knowledge systems and beliefs of First Nations people and the importance of valuing and enabling participation in society in ways that are meaningful to First Peoples.²⁰ It includes the human rights framework and the social model of disability to ensure that enablers, approaches, services and supports are culturally safe and inclusive, and disability rights informed. We do note that despite the strengths of First Nations cultures of inclusion, there remains the disproportionate engagement and adverse impact of participation in society, including economic participation and financial security of First Nations people with disabilities due to intersectionality of both systemic ableism, and systemic racism.

²⁰ Avery, S. (2018). *Culture is Inclusion: A narrative of Aboriginal and Torres Strait Islander people with disability*. First Peoples Disability Network (Australia). Sydney, Australia, <https://disability.royalcommission.gov.au/system/files/exhibit/EXP.0020.0001.0001.pdf>.

FPDN has developed a Cultural Model of Inclusion Framework that incorporates 8 critical aspects, including ensuring processes to power-up First Nations people with disability, asserting the need for the Centre to have meaningful First Nations disability representation at all levels and to embed First Nations ways of researching and sharing information.

An example of how the framework and Closing the Gap Priority Reforms can apply to a Centre of Excellence, is the National Centre of Excellence on Intellectual Disability Health (NCoE IDH) where FPDN is one of nine consortium members. A cultural model of inclusion framework has led the design of the NCoE IDH and will be embedded across leadership and culture, governance, policies and systems policies, workforce, and activities of the NCoE IDH including research and data, knowledge translation, sector capacity development in a mainstream centre. The cultural model of inclusion should be considered as a framework for the operation of the Disability Employment Centre of Excellence as well.

Recommendation 2

The Centre model embeds:

- Leadership by a person or people with disability, particularly people from groups that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability;
- Meaningful disability representation at all levels, including representation from groups that are most impacted by barriers to economic inclusion such as people with an intellectual disability, First Nations people and young people with disability;
- Co-design throughout all stages of the Centre including its development, implementation, and monitoring and evaluation;
- Accountability and independence that drives reform, including monitoring outcomes and evaluation;

- Centralised evidence-informed best-practice tools and resources for increasing inclusive employment;
- Specialised support for specific groups of people with disability that includes specific training and peer-to-peer support relevant to different intersectional communities;
- Cultural Model of Inclusion Framework and the principles of the Priority Reforms of Closing the Gap National Agreement be applied during the development, design and evaluation of the Centre, including specific engagement with FPDN and the First Nations people with disability to implement the framework.

We support a statutory model because we believe this would provide the most accountability and independence in the long term.²¹ In lieu of a statutory agency, a combined research centre/evidence-based training hub model is the strongest model to implement targeted reform in the short term.

The model for the Centre is codesigned in consultation with people with disability to facilitate a shared understanding and consensus about what model the Centre should take.

People with disability be provided with clear information in accessible, inclusive formats, that clearly explains what the different models would look like, so that people with disability can make informed decisions about which model is most fit for purpose.

Discussion of model preferences

1. Statutory Model

²¹ See below discussion at page 25 under 'Statutory Model' regarding the challenges of setting up a statutory body in the short to medium.

- **Accountable and independent mechanism to drive change through monitoring outcomes and evaluation**
- **Consolidates data and improves data collection methods and establishes common metrics for measuring progress**

We believe an independent entity would coordinate, monitor, evaluate and create accountability for major employment reforms across the business sector, government, and the community more generally.

One of the many challenges of addressing the employment barriers for people with disability in the past has been the lack of an independent, coordinating entity that can work across a variety of government departments and agencies, breaking down policy and implementation silos.

In previous years, DROs have advocated for a new legal and statutory entity modelled on the Workplace Gender Equality Agency (WGEA) that could create and drive reform across legislative, policy and social changes. We believe that a statutory agency would, in the longer-term, be the most effective model for the Centre in relation to:

- Accountability and independence;
- Driving and monitoring policy and legislative change, especially within the social security system (for example, reform to income support payments like the Disability Support Pension);
- Central reporting and data collection functions;
- Enforcing and evaluating organisational change across the business and public sectors;
- Generating scalable and transferable best practice models; and
- Elevating the public profile of disability employment, including through elevating people with disability into more public positions of leadership.

At the same time, we acknowledge the challenges associated with the establishment of a statutory agency. We understand that setting up a statutory body is complex and

time consuming and may not meet the Government's short- to medium-term priorities for establishing a centre.

People with disability have said there would need to be more accessible information about what a statutory agency is, what would need to happen to implement it, and how it would differ from other government agencies or training models that are already happening through DROs.

2. Evidence-Informed Training Hub

- **Builds evidence-informed best-practice tools and resources that are accessible and available to all people with disability**
- **Creates and consolidates resources and training to improve all employers' capacity, confidence and competence in inclusive employment**

If a statutory agency is not able to be supported by government, a combined research/evidence-based training hub is our second choice. We believe this model would be able to implement targeted, immediate change with a focus on the pragmatic dissemination and uptake of evidence-based best practice for increasing inclusive employment.

However, in our view an Evidence-Informed Training Hub would not have the strength of an independent entity, nor would it be as influential in working to overcome structural barriers to employment.

One of the key functions of this kind of model should be concentrating what we already know about best practice (both in national and international contexts), scaling up existing small-scale models that we know are working well, and introducing these models into new jurisdictions and sectors.

There should be a strong focus on taking international evidence and lessons and applying them to a local context; applying models that work well with specific cohorts (such as intellectual disability) and modifying their application to other cohorts (people with autism, acquired brain injury, etc.); and educating professionals and

employers through training (designed and delivered by people with disability and their supporters, who would be remunerated for their work) on how to create customised, inclusive employment effectively.

Other activities of the research/training hub (which we believe could also be achieved by a statutory agency) would include:

- Building evidence-based practice to drive change;
- Delivering training and support (non-accredited and accredited options) to build the capacity of employment service providers;
- Providing opportunities for people with disability to be employed and trained to deliver training and upskilling to employment service providers and employers more broadly; and
- Building the confidence and skills of employers.

As the Options Paper points out, this model may be best able to leverage existing services and networks by establishing links or partnerships with practice experts — which we believe should include people with disability (including experienced self-advocates), relevant research bodies and existing evidence-based training models.

3. Learnings from other models

FPDN has experience in setting up a hybrid hub and spoke model as evidenced by the work with the National Centre of Excellence in Intellectual Disability Health ('NCoE IDH'). Involvement in this consortium has ensured that FPDN will lead the development of a culturally inclusive environment, whilst embedding the principles of such across all areas of work within the NCoE IDH. Whilst the implementation of the NCoE IDH has yet to be fully achieved, FPDN has continued to work on an overarching focus on these principles, whilst recognising the competing demands of the different agencies involved in the development of the NCoE IDH.

Where could a Centre be best placed?

[Question 4.1]

The placement of the Centre will be informed by the model and functions of the Centre.²²

Whatever model is chosen, its placement needs to ensure that it is properly funded, resourced and supported by independent monitoring, evaluation and accountability.

What should be the core functions of the Centre?

[Question 1.2]

The 'Disability Employment Centre for Excellence' should be an independent, sustainably resourced agency which establishes accessible, inclusive and equitable ways for people with disability to lead significant employment reforms across the country. The Centre presents a crucial opportunity for people with disability to lead and shape much needed social and economic change in relation to inclusive employment.

We reiterate that the Centre must be led by people with disability, shaped by expertise and lived experience of people with disability, particularly people from groups that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability. The Centre must reflect the diversity and the intersectional experiences of people with disability from diverse backgrounds.

The Centre's core functions must be codesigned in consultation with people with disability to facilitate a shared understanding and consensus, including providing people with disability clear information in accessible, inclusive formats.

²² See discussion above at page 21 'What should be the model of the Centre?'

Provide specialised support for groups most impacted by barriers to economic inclusion

- Procure or undertake research and capacity building related to the experiences of people with disability who face unique barriers to inclusive employment, including but not limited to:
 - Young people, including school leavers;
 - Aboriginal and Torres Strait Islander people;
 - Culturally and Linguistically Diverse (CaLD) people;
 - People who need support for decision-making;
 - People with complex needs, including complex communication needs;
 - People who may have difficulty accessing and using technology;
 - People who live in regional, rural and remote areas;
 - People over the age of 45; and
 - People transitioning from supported employment, with specific consideration and resourcing allocated to supporting people with complex needs and their family members or supporters;
- Ensure training and capacity building activities are extended to schools to start the process early and proactively establish links with disability employment services and connect them with students, gradually preparing them for success with post-school employment opportunities; and
- Address the differences between regional, rural and remote Australia and urban areas regarding employment choices and opportunities.

Builds evidence-informed best-practice tools and resources that are accessible and available to all people with disability

- Concentrate and transmit what we currently know about best practice and the lessons from international contexts, as well as other sectors within Australia;
- Build upon current programs and practices which have been helpful to people with disability, such as the JobAccess service, to identify and best practice approaches as well as foster and support innovation;

- Provide tools and training for advocates and raise awareness of the availability of independent advocacy services to help people with disability through the many stages of employment;
- Develop and quality-assure training and professional development materials for all employment providers, leveraging existing evidence-based best practices both nationally and internationally.

Creates and consolidates resources and training to improve all employers' capacity, confidence and competence in inclusive practices

- Engage with employers of all sizes and types to facilitate better employment outcomes for people with disability, with people with disability and their supporters leading this work, and being supported and remunerated to do so; and
- Lead attitudinal change among employers and the community more broadly, ensuring that there are high expectations of people with disability regarding careers, including establishing greater opportunities for career pathways and professional development, which support people with disability to have and achieve their aspirations and ambition.

Consolidates data and improves data collection methods and establishes common metrics for measuring progress

- Collect and analyse data on employment outcomes for all people with disability (including intersectional data and data from supported, open and self-employment settings) and share (and, in appropriate cases, co-ordinate the receipt of) de-identified data subject to appropriate ethics, data-sharing agreements, privacy and confidentiality protocols being enacted with:
 - Commonwealth, state and territory government agencies;
 - Researchers, including the National Disability Research Partnership;
 - The National Disability Data Asset;
 - Disabled People's Organisations and DROs;
 - Employers and/or their representative groups;
 - DES providers and/or their representative groups; and

- The general public.
- Identify gaps in data and improve the data around intersectional experiences of people with disability to improve the reflections of diverse communities. For example, data often cannot be found for overlapping layers such as the lived experience of being a First Nations person and with disability.

Accountable and independent mechanism to drive change through monitoring outcomes and evaluation

- Review, monitor and advise upon:
 - The interaction of the DES program with other government employment programs, the National Disability Employment Strategy, the NDIS, government payments and benefits able to be claimed by people with disability and legislation concerning workplace terms and conditions;
 - Eligibility restrictions relating to work capacity and income support status; and
 - Program evaluation.
- Support regulation of the employment of people with disability;
- Report on employment outcomes for people with disability; and
- Oversee trials concerning innovative models of employing people with disability in the DES program, including where eligibility restrictions and income support status are modified.

Incorporates communities of practice that centres the experience of people with disability

- Peer-to-peer support and resources can be the key space where people from these backgrounds share stories, experience, discuss ideas and co-design innovative approaches to increase the employment rates of people with disability from diverse backgrounds;
- Their lived experience expertise can also be utilised to make the Centre's processes/documents/premises/policies etc. accessible, plain English, translated, inclusive etc; and

- Provide publicly available information, tools and resources to facilitate the employment of people with disability, including but not limited to advertising campaigns.

Recommendation 3

The Centre's core functions focus on significant employment reforms, led and shaped by people with disability to improve outcomes for economic inclusion by ensuring that the Centre is:

- Led by people with disability, particularly people from groups that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability;
- Its work is shaped by the expertise and lived experience of people with disability;
- Reflects the diversity and intersection of people with disability from diverse backgrounds;
- Incorporates a First Nations cultural model of inclusion;
- Provides specialised support for groups most impacted by barriers to economic inclusion;
- Builds evidence-informed best-practice tools and resources that are accessible and available to all people with disability;
- Creates and consolidates resources and training to improve all employers' capacity, confidence and competence in inclusive employment (including communities of practice for employers);
- Consolidates data and improves data collection methods and establishing common metrics for measuring progress;
- Establishes an accountable and independent mechanism to drive change through monitoring outcomes and evaluation; and
- Incorporates communities of practice that centres the experience of people with disability.

The Centre's core functions are codesigned in consultation with people with disability to facilitate a shared understanding and consensus, including the provision of clear information in accessible, inclusive formats.

Who can the Centre assist?

[Question 2.1]

We support the assertion in the Options Paper that the Centre could assist:

- People with disability and their supporters;
- Employment service providers;
- Employers;
- Supported employment services; and
- Disability advocates.

When considering the opportunities for the Centre to assist these stakeholder groups, we reiterate the importance of considering the elements outlined below.

People with disability and their supporters

People with disability and their supporters can be assisted by the Centre. There should be thoughtful consideration given to how the Centre would best support and deliver good outcomes to people with disability from a diverse range of backgrounds and with diverse disabilities, including but not limited to:

People from diverse backgrounds:

- Young people, including school leavers transitioning to employment;
- Aboriginal and Torres Strait Islander people;
- Culturally and Linguistically Diverse (CaLD) people;
- LGBTQIA+ people;
- People who live in regional, rural and remote areas—and that for this cohort, there are specific training opportunities for people with disability, employers

and employment service providers that is specific and targeted to what works within that location, rather than relying on a one-size-fits-all approach; and

- People transitioning from supported employment, with specific consideration and resourcing allocated to supporting people with complex needs and their family members or supporters.

People with diverse disabilities

- People with intellectual disability;
- Autistic people;
- People with complex needs, including complex communication needs; and
- People who may have difficulty accessing and using technology.

Supported employment services

In relation to assisting supported employment services, there should be an emphasis on supporting people who want to transition to open employment, especially people with complex needs and their family members or supporters, including working with specific supported employment advocacy programs. The Centre could provide technical advice and assistance to ADEs to support moves to wages more in line with the national minimum wage, as recommended by the Disability Royal Commission.

Disability advocates

Independent disability advocates, including the new supported employment disability advocates, can provide support for people with disability with diverse support needs to navigate employment barriers and gain necessary support with the Centre.

When properly resourced and integrated into employment supports, advocates can help people with disability engage with employers, disability employment service providers, and supported employment services.

The Centre offers an opportunity to more effectively integrate advocacy into employment systems, meaning increased capacity to assist people with disability, engage with employers, and intervene early to resolve issues with employment.

Through the Centre, disability advocates can play an integral role in reducing segregation in employment and ensuring that there is appropriate support for people with disability to enter and maintain employment.

Additional groups who the Centre can assist?

We believe that the Centre can also assist the following groups:

- Schools, including career advisors and others involved in supporting young people in the transition from school to higher education and work to gain the capability to support all students equally;
- Individual support workers who may be supporting a person with disability to find employment outside of employment service providers;
- Employees working within businesses who employ and support people with disability well; and
- The general public through raising awareness, working to change community attitudes, and building the overall profile of disability-led initiatives for increased inclusive employment.

Recommendation 4

The Centre should specifically identify in its purpose and functions to provide specialised support and deliver good outcomes to people with disability from diverse backgrounds and with a variety of disability. Co-design should consult specifically with groups that are most impacted by barriers to economic inclusion, including young people with disability transitioning from school to employment, people with intellectual disability, and those from CaLD (Culturally and Linguistically Diverse), First Nations and regional or remote communities.

How can the Centre work with stakeholders to achieve its purpose?

[Question 2.2 - 2.3]

Effective working partnerships and collaboration are crucial to the achievement of the Centre's success in improving employment outcomes for people with disability. The Centre should establish links and partnerships that leverage existing services, networks, and experts including:

- People with disability (including experienced self-advocates) and their supporters;
- Relevant research bodies and academics;
- Advocates and advocacy organisations; and
- Disabled People's Organisations and DROs.

Recommendation 5

The Centre should establish links and partnerships that leverage existing services, networks and experts, including people with disability (including experienced self-advocates) and their supporters, including but not limited to relevant research bodies and academics, advocates and advocacy organisations; Disabled People's Organisations and DROs.

What elements of the proposed role of the Centre or its functions should be prioritised?

[Question 4.3]

We agree with the steps laid out in the Options Paper in relation to establishing the evidence base and building best-practice tools and resources. We are pleased to see a recognition of this, and that this needs to be leveraged. We strongly believe that this prioritisation should be led by people with disability (for example, including

partnerships with research institutes to do the work of translating relevant research into practical tools and resources) and enable peer-to-peer transfer of this knowledge.

People with disability have told us that more information about the Centre—including the proposed model and how it will be led and implemented—needs to be made available.

This information needs to be in accessible formats, including Easy Read and audio/visual materials. This more detailed information needs to be delivered by people with disability and family through a consultative process designed to inform and collect views about the Centre.

Recommendation 6

A communication plan needs to be implemented so that people with disability are kept informed and updated throughout the design and implementation processes of the Centre.

Are there any other implementation issues that should be considered?

[Question 4.2]

Reconsidering the proposed name of the Centre

The name “Disability Employment Centre of Excellence” did not appeal to many within our communities. We have concerns, supported by perspectives from our communities,¹¹ that this name does not accurately reflect the suggested purpose of the Centre to empower people with disability to lead and shape the Centre to be a driving force for economic inclusion.

It is also noted that the name would lead to confusion between the Disability Employment “Centre of Excellence” and the “National Centre of Excellence in

Intellectual Disability Health”, both of which are likely to be shortened to ‘the Centre of Excellence’ in public and sector conversations.

In light of these concerns, we strongly believe that reconsidering the proposed name should be included in the process of consultation with people with disability, supported by further detailed, accessible information about the Centre.

Recommendation 7

The proposed name of the Centre, “Disability Employment Centre of Excellence” be reviewed through consultation with people with disability.

Conclusion

DROs and other individuals and organisations supporting this submission welcome the opportunity to provide feedback on the Options Paper ‘Establishing a Disability Employment Centre of Excellence.’

As outlined, this represents the significant opportunity that establishing the Centre will have in improving the economic inclusion of people with disability. We strongly reiterate the importance of the following elements in improving economic inclusions:

- It is led by people with disability, particularly people from groups that are most impacted by barriers to economic inclusion, such as people with intellectual disability, First Nations people with disability and young people with disability;
- Its work being shaped by the expertise and lived experience of people with disability;
- Reflecting the diversity and intersection of people with disability from diverse backgrounds;
- Incorporating a First Nations cultural model of inclusion and building on the principles of Closing the Gap National Agreement;

- Providing specialised support for groups most impacted by barriers to economic inclusion;
- Building evidence-informed best-practice tools and resources that are accessible and available to all people with disability;
- Creating and consolidating resources and training to improve all employers' capacity, confidence and competence in inclusive employment (including communities of practice for employers);
- Consolidating data and improved data collection methods and establishing common metrics for measuring progress;
- Establishing an accountable and independent mechanism to drive change through monitoring outcomes and evaluation; and
- Incorporating communities of practice that centres the experience of people with disability.

We look forward to continuing to work with the Department of Social Services to establish the Centre with people with disability.