

**Disability Services and Inclusion
Bill 2023:
A joint submission from Disability
Representative Organisations**

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Acknowledgements and style note

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.

The submission was prepared with the assistance of the Coordinator, National Coordination Function for DANA.

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

Signatories to this submission

The following individuals and organisations endorse this submission.

- Andrew Liew
- Australian Federation of Disability Organisations
- Blind Citizens Australia
- Children and Young People with Disability Australia
- Darwin Community Legal Centre
- Deaf Australia
- Deafblind Australia
- Down Syndrome Australia
- Family Advocacy
- First Peoples Disability Network
- Inclusion Australia
- National Mental Health Consumer and Carer Forum
- National Ethnic Disability Alliance
- People with Disability Australia
- Women with Disabilities Australia

Contributors to this submission

The following organisations contributed during the development of this submission:

- Disability Advocacy Network Australia (DANA)

- People with Disability Australia (PWDA)
- Inclusion Australia
- Australian Federation of Disability Organisations (AFDO)
- National Ethnic Disability Alliance (NEDA)
- Children and Young People with Disability Australia (CYDA)
- Darwin Community Legal Centre
- Deaf Victoria
- Queensland Advocacy for Inclusion (QAI)
- Physical Disability Australia (PDA)
- Deaf Australia
- Blind Citizens Australia
- Family Advocacy
- Public Interest Advocacy Centre (PIAC)
- Women with Disabilities Australia (WWDA)
- First Peoples Disability Network (FPDN).

We also thank the individuals who provided input into this submission.

Introduction

Disability Representative Organisations (DROs) and other individuals and organisations supporting this submission welcome the opportunity to provide feedback on the exposure draft of the Disability Services and Inclusion Bill 2023.

This submission responds to the five consultation questions posed by the Department of Social Services:

1. Please tell us how much you agree or disagree with the objects and principles in the Bill.
2. Please tell us how much you agree or disagree with this broad approach to who should receive supports and services.
3. Please tell us how much you agree or disagree with these categories in the Bill. Do you have any additional comments about the categories?
4. Please tell us how much you agree or disagree with the arrangements in the Bill to ensure delivery of safe and quality supports and services. Do you have any additional comments about arrangements in the Bill to ensure delivery of safe and quality supports and services?
5. Do you have any additional feedback about the Bill?

This submission has been made by these organisations based on their collective expertise and experience, coordinated by the Disability Advocacy Network Australia (DANA). Many individuals who contributed to this submission bring their own lived experience of disability. However, the timelines for this consultation did not enable 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 the development and implementation of the new Bill from now on.

Each of the organisations involved in this submission recognise the significant opportunity the replacement of the Disability Services Act 1986 represents. We look forward to continuing to work with the Department of Social Services to ensure the Bill is based on the voices of people with disability to make it the strongest Bill it can be, setting the framework for years to come.

List of recommendations

Objects of the Bill

Recommendation 1: The Bill should ‘embed *and give effect to*’ the Convention of the Rights of Persons with Disabilities (CRPD) rather than just ‘*give effect*’¹ to the CRPD – subclause 3(a).

Recommendation 2: The first object of the Bill should be: (a) ‘advance the inclusion and participation in the community of people with *disability*’.²

Recommendation 3: Clause 3(e) should be expanded to include the need to address and overcome barriers to inclusion (not just raising awareness about them).

Recommendation 4: The inclusion of people with disability should be promoted in the Bill without qualifiers. The wording ‘*to the extent possible*’ in subclauses 3 (h)(ii-iv) contravenes the concept of full inclusion and should be removed.

Recommendation 5: Add the following object to 3(h): ‘*support people with disability to access supports and services that do not give rise to segregation or isolation.*’

Recommendation 6: Subclause 3(h)(v) should be expanded to acknowledge other aspects of intersectionality – diversity of disability, First Nations people, location/geographic diversity, migrant and refugee people with disability, people with disability who have diverse gender and sexuality.

Recommendation 7: The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) should be added to the list of obligations Australia is a party to in subclause 3 (i).

Recommendation 8: Reflect the requirement for supports and services to be trauma-informed and culturally safe in subclause 3(h).

Recommendation 9: The Bill should recognise the gaps in the various schemes and programs of support for people with disability and the need for continued development of programs to fill these gaps, and better delineate government departmental responsibilities for support provision.

Recommendation 10: The Bill should make a commitment that the Australian Government will provide ongoing funding for DROs and advocacy services.

General principles

Recommendation 11: The following be added to the General principles under subclause 4: ‘people with disability are equal before and under the law and are entitled to protection against discrimination on all grounds, including *protection from facilities or activities that result in segregation or isolation.*’

Eligible activities

Recommendation 12: The following eligible activities should be added to subclause 13(1):

- provision of legal services to promote and protect legal rights;
- provision of disability services and supports in places of detention, including youth justice, prisons and immigration;
- Information Linkages and Capacity Building (‘Tier 2’) – to recognise the need for increased disability services outside of the NDIS, and increased inclusion in mainstream services and the community; and
- transport.

Recommendation 13: The wording in the following subclauses be altered to read:

- Subclause 13(1)(d) - ‘the provision of supports that facilitate participation in mainstream education settings’; and
- Subclause 13(1)(e) - ‘the provision of supports that facilitate participation in open employment settings.’

Code of conduct

Recommendation 14a: The Bill should state how a service’s compliance with the Code of Conduct will be proactively monitored.

Recommendation 14b: The Bill should state how and to whom a breach of the Code of conduct will be made.

Recommendation 14c: The Bill should state who will act and what the action will be in response to a breach of the Code of conduct.

Recommendation 14d: Monitoring and compliance activities under this Bill should align with, and complement, activities undertaken by other agencies, rather than duplicating effort or diluting resources.

Recommendation 14e: A subclause at clause 20 be introduced that provides that all funding agreements will include measures to enable the Government to be satisfied the service provider is complying with the Code of conduct, and/or for the service provider to report or be audited against those measures. A contractual term would enable compliance checks to be tailored to each service provider, depending on whether it is appropriate having regard to the nature of the service.

Recommendation 14f: Provision be made in the Bill under clause 20 stating that the Code of conduct must not contain any provisions that constrain advocacy activities of funding agreement recipients.

Review of sanction decisions under subclause 14(6)

Recommendation 15: Decisions of the Minister under subclause 14(6) be subject to merits review.

Other

Recommendation 16: The period for a person who does not have a certificate of compliance for a regulated activity to seek and obtain such a certificate should be no more than 12 months (subclause 9(3)).

Recommendation 17: The Bill should specify a requirement for the Department to make information about the performance of services publicly available on an annual basis and directly available to people who access the service or program.

Recommendation 18: The Bill should make a requirement that people with disability are involved in the evaluation of funded services, and that resourcing for the evaluation and compliance activities of a service be included in a service's funding contract.

Recommendation 19: The Bill should specify that the development of the Rules (and any delegated legislation) be codesigned with people with disability and the DROs.

Recommendation 20: The Bill should establish an overall vision for an inclusive Australian society to reflect the inclusive intention of other significant commitments by the Australian Government such as Australia's Disability Strategy 2021-2031.

Response to consultation questions

Please tell us how much you agree or disagree with the objects and principles in the Bill. Do you have any additional comments about the objects and principles in the Bill?

Objects

Overall, we agree with the Objects of the Bill.

We make comment on the following:

Convention on the Rights of People with Disability (CRPD)

The Bill should ‘embed *and give effect to*’ the CRPD rather than just ‘*give effect*⁸ to the CRPD – subclause 3(a).

The Bill must embed the principles of the CRPD and progress the major systemic and structural change needed to realise the purpose of the Convention (Article 1) of “*promot[ing], protect[ing] and ensur[ing] the full enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their human dignity*”.

The Bill must also set the basis for realising the CRPD vision and associated Articles by codifying the rights, duties, positive obligations and enforcement mechanisms required to realise these rights. These changes should ensure that policies, programs and supports that affect people with disability are aligned with the CRPD at every level.

Inclusion

Inclusion needs to be the first objective of the Bill, as it is in the Disability Act 2006 (Victoria). We suggest adding the following wording under clause 3:

- The objects of this Act are to: (a) ‘advance the inclusion and participation in the community of people with disability’.⁴

Clause 3(e) should be expanded to include the need to address and overcome barriers to inclusion (not just raising awareness about them).

The inclusion of people with disability needs to be promoted in the Bill without qualifiers. The wording '*to the extent possible*' in subclauses 3 (h)(ii-iv) contravenes the concept of full inclusion and needs to be removed.

Add the following object to 3(h): '*support people with disability to access supports and services that do not give rise to segregation or isolation.*'

Intersectionality

We strongly support the Bill's recognition of intersectional identities and the inclusion of age, sex, gender identity, sexual orientation, intersex status, ethnicity, religious beliefs, and cultural and linguistic backgrounds as attributes which intersect with and may result in compounding forms of disadvantage. We note that culturally and linguistically diverse people with disability, LGBTQIA+ people with disability, women and girls with disability, children with disability, and older persons with disability face unique barriers to accessing services and support. However, crucially, the subclause 3(h)(v) of the Bill must be amended to include the following demographics and aspects of intersectionality.

- **Diversity of disability**, with people having a range of conditions or impairments which impact the realisation of rights or experiences of marginalisation, including intellectual disability, dual diagnosis, chronic illness, psychosocial disability, episodic disability, and invisible disability.
- **First Nations people**, who continue to sit at the periphery of the disability services sector, regularly being prevented from accessing the supports they should be entitled to.
- **Location/geographic diversity**, recognising that people with disability who live in regional, rural, remote, and very remote areas have the same rights as others and should not experience discrimination or sub-standard services based on their location.
- **Migrant and refugee people with disability**, who when faced with multiple factors such as disability, cultural differences, and communication difficulties, are at a higher risk of social and economic exclusion.

The recognition and expression of human diversity and intersectionality is in line with multiple articles of the CRPD and the Bill should facilitate this. The Bill should also recognise that individuals and communities may need information, education or support and service approaches (including outreach) tailored to meet their needs. Funded entities should also have to demonstrate how they are recognising and responding to the intersectional backgrounds and diversity of people with disability.

International obligations

The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) should be added to the list of obligations Australia is a party to in subclause 3 (i).

Trauma-informed and culturally safe services

The requirement for supports and services to be trauma-informed and culturally safe should be reflected in subclause 3(h).

Acknowledge there are gaps in current services and programs

The Bill should recognise the gaps in the various schemes and programs of support for people with disability and the need for continued development of programs with people with disability to fill these gaps, and better delineate government departmental responsibilities for support provision.

Commitment to ongoing funding for DROs and advocacy services

The Bill should make a commitment that the Australian Government will provide ongoing funding for DROs and advocacy services and provide funding to services for capacity building.

Principles

Overall, we agree with the General principles in the Bill

The following principle be added to the General principles under subclause 4: *'people with disability are equal before and under the law and are entitled to protection against discrimination on all grounds, including protection from facilities or activities that result in segregation or isolation.'*

Children and Young People with Disability Australia (CYDA) notes the principles are phrased in quite a negative way, focussing on the fact that people with disability should be 'free from' abuse, neglect and exploitation (and discrimination). CYDA suggest the principles could be more aspirational, for example, 'People with disability receiving supports or services have the same right as other members of society to receive those supports or services in a way which results in the least restriction of their rights and opportunities'. Further, reference to people with disability have the right to pursue full and meaningful participation in mainstream community life needs to be made.

Please tell us how much you agree or disagree with the broad approach to who should receive supports and services. Do you have any additional comments about the broad approach taken?

Overall, we agree that ‘disability’ is not defined in the Bill. This is because in practice definitions change over time, definitions exclude people more than include them, and the focus needs to be on people’s needs rather than if they fit into a definition.

We note that the Bill does not define ‘disability’ or limit supports and services funded under the Bill to a specific target group. The Bill will allow funding of supports and services for all people with disability, including people who do not have a permanent disability, people who may not have access to a diagnosis, and people who are not eligible for the NDIS.

The broad nature of the Bill means that there will be more flexibility in designing and operating new supports and services. The intent here is that the people who need support can get it and that it will meet their needs.

We note Physical Disability Australia (PDA) is of the view disability should be defined so a clear distinction is made between those who are eligible for the services and supports the Act is supposed to provide and those who are outside its purview.

Please tell us how much you agree or disagree with the categories in the Bill. Do you have any additional comments about the categories?

Overall, we agree with the categories in the Bill.

We make the following comments:

Flexibility to fund new supports and services

We understand the Bill will allow funding for broader supports and services in a range of categories, including: ⁵

- accessibility
- accommodation
- advocacy
- capacity building
- education
- employment
- independent living
- information
- recreation

- research and evaluation
- respite care.

The Bill will allow the Minister to expand on these categories in the future to make sure that supports and services required to meet the needs of people with disability in the future are provided. Revision of the list should be done through a genuine consultation process with the DROs.

The Bill will expand funding options to include other arrangements for funding supports and services. This will ensure that funding is not limited to financial grants and includes other options.

A wider variety of support and service categories and funding options means more flexibility to fund new supports and services to respond to emerging gaps, needs and changing circumstances.

We welcome the flexible and non-exhaustive range of supports and services that the Bill will allow funding for. However, specific reference to the following eligible activities in subclause 13(1) are needed:

- provision of legal services to promote and protect legal rights;
- provision of disability services and supports in places of detention, including youth justice, prisons and immigration;
- Information Linkages and Capacity Building ('Tier 2') – to recognise the need for increased disability services outside of the NDIS, and increased inclusion in mainstream services and the community; and
- transport.

Further, we recommend altering the wording of the following in subclause 13(1):

- Subclause 13(1)(d) - the provision of supports that facilitate participation in mainstream education settings; and
- Subclause 13(1)(e) - the provision of supports that facilitate participation in open employment settings.

Please tell us how much you agree or disagree with the arrangements in the Bill to ensure delivery of safe and quality supports and services. Do you have any additional comments about arrangements in the Bill to ensure delivery of safe and quality supports and services?

Overall, we agree with the arrangements in the Bill to ensure delivery of safe and quality supports and services. However, we make the following comments regarding the Code of conduct and the power of the Minister to make sanction decisions.

Code of conduct

Services and programs need to be monitored closely against their compliance with the Code of conduct and the consequences of non-compliance.

We understand the Bill requires providers to have suitable complaints and incident reporting systems. These requirements already apply to existing providers through their grant agreements. Placing these in the Bill will make the Department of Social Services' requirements clear and more visible.

The Bill also stipulates that providers who are subject to a banning order under the NDIS Act 2013 (Cth) will not be eligible to receive funding under the Bill.

The intention is the Code of conduct will largely mirror the NDIS Code of Conduct. This will make it easier for providers to meet requirements and focus on service delivery which will benefit people with disability who receive services.⁶ However, the NDIS Quality and Safeguards Commission has a specific role in oversight of quality and safety across NDIS-funded services, including compliance with the NDIS Code of Conduct. It is not clear in the Bill how compliance with the new Code of conduct will be monitored and enforced. We are of the view a mechanism/regulatory body monitors and enforces compliance, to ensure accountability, transparency and a culture of compliance across providers.

It is insufficient to rely on complaints provided by people with disability, families, or supporters. It is also insufficient (and undermines impartiality) to rely on personnel associated with or engaged by a service to identify and report a breach. Additionally, there must be clear expectations about what will happen - and real consequences - for breaches of the Code of conduct.

The disability community's experience in the Disability Employment Services (DES) program has shown that effective quality monitoring and management requires codesign, commitment, and adequate resourcing.

Overall:

- The Bill should state how compliance with the Code of conduct will be proactively monitored.
- The Bill should state how and who a breach of the Code of conduct will be made.
- The Bill should state who will act and what the action will be in response to a breach of the Code of conduct.
- The onus should not be only on people associated with a service to identify and report a breach.
- Monitoring and compliance activities under this Bill should align with, and complement, activities undertaken by other agencies, rather than duplicating effort or diluting resources.
- A subclause at clause 20 be introduced that provides that all funding agreement will include measures to enable the Government to be satisfied the service provider is complying with the Code of conduct, and/or for the service provider to report or be audited against those measures. A contractual term would enable compliance checks to be tailored to each service provider, depending on its appropriate having regard to the nature of the service.
- Provision be made in the Bill under clause 20 stating that the Code of conduct must not contain any provisions that constrain advocacy activities of funding agreement recipients.

We ask that the Government consider recommendations from the Disability Royal Commission and the NDIS Review about mechanisms/regulation to ensure quality and safeguarding, and that the Bill should reflect those recommendations.

Review of sanction decisions - subclause 14(6)

We note the enforcement provisions of the code of conduct are discretionary i.e., the Minister 'may' terminate, vary, or publish in the event of breach. Any such enforcement would therefore require a decision by the Minister (or their delegate). As the explanatory memorandum states, these decisions could not be merits reviewed (by a body such as the Administrative Appeals Tribunal), but a person would have access to judicial review under the Administrative Decisions (Judicial Review) Act 1977 (Cth).

Given the significant impacts of any such enforcement decision (e.g., termination of funding could be hugely detrimental to the organisation's continuing operation), we recommend that decisions of the Minister under subclause 14(6) be subject to merits

review. Judicial review is unlikely to be an adequate substitute for merits review in this context, as it has a different purpose and outcome and is only aimed at identifying legal errors in the decision-making process rather than weighing the appropriateness of the decision on its merits.

In recommending an avenue for merits review, we are mindful that any merits review provisions would also be available to providers who had been sanctioned for misconduct; the merits review process could allow these providers to delay or overturn sanctions, and so continue with inappropriate or unsafe practices. This risk could be mitigated by appropriate drafting, such as by adding time limits to merits review processes, or provisions governing the interim situation while merits reviews are ongoing.

Do you have any additional feedback about the Bill?

Oversight by people with disability

People with disability need to be put at the centre of the Bill through codesign and ongoing governance /oversight, including people with disability in closed settings such as group homes, prisons, and immigration detention.

Monitoring and evaluation of the Bill will ensure that the CRPD is being enacted in Australia. People with disability should be central to this process in an advisory or governance arrangement where theirs is the majority voice in decision-making.

Delegated legislation

The detail of how the Bill will work will be specified in the Rules (clause 36). We strongly recommend the development of the Rules be codesigned with people with disability, including the DROs – and that this requirement is specified in the Bill.

Resourcing service compliance and reporting requirements

Compliance with the code of conduct will be a statutory funding condition (subclause 15(1) and (2)), as will be the requirement to meet certificate of compliance standards.⁷ The cost for a service to undertake compliance and reporting activities (including evaluation) must be included in the funding provided by the Australian Government and specified in the funding contract.

Similarly, the cost for a service to evaluate its activities must be included in the funding provided by the Australian Government to the service and specified in the funding contract. The Australian Government must make the evaluations public.

Segregated employment

We welcome the removal of specific reference to ‘supported employment services’ from the existing Act⁸ and to the overall commitment to inclusion. However, to be consistent with human rights principles and comply with Australia’s international legal obligations, the Bill/delegated legislation needs to expressly state it cannot authorise or endorse any employment supports or environments that segregate and isolate people with disability. The Australian Government must ensure the Bill ends provisions that exploit the labour of people with disability.

The Bill and any subsequent Rules must also recognise the evidence about effective and inclusive employment supports and environments, so that the Australian employment service system can learn from good international practice and respond to individuals’ needs and circumstances. There is significant international evidence about effective policy and practice approaches for inclusive employment, such as customised employment and the Employment First policy approach in the United States.⁹ The development of a Bill in Australia provides a unique opportunity for the Australian Government to consider legislative support for, and enablement of, evidence-based approaches like customised employment.¹⁰

The Bill must allow space for the reform of employment services (currently DES) which is being reviewed by the Australian Government. The UN Committee has already recommended reform to DES, in its 2019 review of Australia’s work to realise the rights of people with disability through the CRPD.¹¹

Customised employment must be a core feature of the new model. These services must be genuinely inclusive and person-centred. Customised employment must focus on supporting appropriate, accessible, and sustainable employment outcomes for people with disability, rather than promoting segregation or focusing on providers’ interests at the expense of ‘service users.’ People with disability must be given equitable opportunities rather than the current focus on under/low paid ‘volunteering’ or ‘work experience’ which is common. Many of the organisations and individuals contributing to this submission have provided substantial input to the Department on DES reform in recent years.

Segregated education

To be consistent with human rights principles and comply with Australia's international legal obligations, the Bill needs to expressly state it cannot authorise or endorse any education supports or environments that segregate and isolate people with disability.

Research evidence consistently demonstrates that children and young people with disability fare less well than their peers in education. 'School aged students with disability are segregated, suspended, and expelled at higher rates. Over the last fifteen years, the highest level of educational attainment for people with disability . . . remains lower than children and young people without disability. These inequities can have lifelong implications.'¹²

To ensure that policies, programs and supports that affect people with disability are aligned with the principles of the CRPD at every level, we recommend the Bill recognises the importance of:

- embedding the rights of students as set out in the CRPD by aligning with 'Driving change: A roadmap for achieving inclusive education in Australia'¹³
- realising inclusive education to ensure all students with disability are fully included in their education; and
- demobilising segregated education.

Further, the CRPD Committee has clarified that the realisation of the right to inclusive education contained in Article 24 of the CRPD 'is not compatible with sustaining two systems of education: mainstream and special/segregated education systems.'¹⁴

Overall vision for inclusion

We welcome the more inclusive nature of the Bill. However, the Bill still does not set out an overall vision for an inclusive Australian society that ensures people with disability can fulfill their potential, as equal members of the community.¹⁵ The Bill maintains the same fundamental purpose as the Disability Services Act 1986 (Cth) which is to allow the Australian Government to fund services and programs for people with disability. Failing to set out an overall vision for an inclusive Australian

society signifies a missed opportunity to set standards for inclusion and for the Bill to reflect the inclusive intention of other significant commitments by the Australian Government such as Australia's Disability Strategy 2021-2031.

Conclusion

The individuals and organisations that support this submission welcome the opportunity to provide feedback on the exposure draft of the Disability Services and Inclusion Bill 2023.

As outlined, this represents a significant opportunity to provide the legislative framework that shapes a society that upholds and furthers the rights and inclusion of people with disability for decades to come. The new Act should not be just about disability services but set the platform for this broader societal change.

The Disability Representative Organisations and others who endorse this submission look forward to continuing to work with the Department of Social Services on the new Act and its delegated legislation.

Endnotes

¹ Disability Services and Inclusion Bill 2023 – Exposure Draft, ss 3(a).

² Disability Act 2006 (Victoria), ss 4(a).

³ Disability Services and Inclusion Bill 2023 – Exposure Draft, ss 3(a).

⁴ Disability Act 2006 (Victoria) ss 4(a).

⁵ Disability Services and Inclusion Bill 2023 – Exposure Draft, ss 13(1).

⁶ Australian Government, Department of Social Services, Disability Services and Inclusion Bill – Summary of the Bill to repeal and replace the Disability Services Act 1986, June 2023.

⁷ The Parliament of the Commonwealth of Australia, House of Representatives, Disability Services and Inclusion Bill 2023, Explanatory Memorandum, 2022-2023, points 81 and 83.

⁸ Disability Services Act 1986 (Cth), s7.

⁹ Office of Disability Employment Policy, Employment First, accessed 30 January 2023 (<https://www.dol.gov/agencies/odep/initiatives/employment-first>).

¹⁰ Inclusion Australia, with support from PWDA, has produced a flagship report on inclusive employment for people with an intellectual disability. This report includes international case studies, qualitative and quantitative analysis, and research papers outlining the barriers facing people with an intellectual disability in employment and identifying a range of solutions. This report is available here:

<https://www.inclusionaustralia.org.au/project/inclusive-employment-project/>.

¹¹ Committee on the Rights of Persons with Disabilities (15 October 2019), Concluding observations on the combined second and third periodic reports of Australia, CRPD/C/AUS/CO/2-3.

¹² Dickinson, H., Smith, C., Yates, S., Faulkner, A. (2022), [Taking the first step in an inclusive life – experiences of Australian early childhood education and care](#), Report

prepared for Children and Young People with Disability Australia (CYDA),
Melbourne, p.2.

¹³ Australian Coalition for Inclusive Education (2020), [Driving change: A roadmap for achieving inclusive education in Australia](#), accessed 19 January 2022.

¹⁴ Committee on the Rights of Persons with Disability, General Comment No. 4: Right to Inclusive Education. UN DOC CRPD/C/GC/4 (entered into force on 2 September 2016).

¹⁵ Commonwealth of Australia (Department of Social Services), 2021, Australia's Disability Strategy 2021-2031