

PO Box 172
Clifton Hill VIC 3068
Phone: 03 9417 1025
Regional & Interstate: 1800 222 660
ABN: 42 140 529 273
www.cyda.org.au

Department of Employment and Workplace Relations
GPO Box 9828
Canberra ACT 2601
Australia

22 July 2026

Attention: Department of Employment and Workplace Relations

Please accept this letter as Children and Young People with Disability Australia's (CYDA) submission to the Department of Employment and Workplace Relations' (the Department) consultation on Shaping the Future of Employment Services. We appreciate the opportunity to provide comment on this important work.

About CYDA

CYDA is the national representative organisation for children and young people with disability, aged 0–25 years. Our vision is that children and young people with disability fully exercise their rights, realise their aspirations, and thrive in inclusive communities. Our work centres on rights-based advocacy, lived experience, and evidence-informed policy.

We acknowledge the Traditional Custodians of the Lands on which this submission has been written, and pay our respects to their Elders past and present. This is, was, and always will be Aboriginal Land.

General comment

CYDA welcomes the Department's consultation on Shaping the Future of Employment Services, as an opportunity to shed light on the intersectional factors that need to be considered when providing employment support. We view the government's commitment to differentiate employment services according to participant need as a positive development towards further recognition of the unique experiences and challenges that young people with disability face in the labour market. We propose that the Department account for the additional barriers to employment that young people with disability face, many of whom access mainstream rather than disability specific employment supports, when designing employment service streams.

Background: Employment barriers for young people with disability

Article 27 of the United Nations Convention on the Rights of Persons with Disability, which Australia is signatory to, affirms the rights of people with disability to work on an equal basis with others.¹

Despite this commitment, young people with disability are one of the most disadvantaged cohorts in the labour market.

With the labour force being defined as both individuals who are employed and unemployed (available and wanting to work), the following relates to young people aged 15-24 with disability in 2022 (ABS, 2025):

- Just over half were participating in the labour force (58.3% or 251,900), **well below the participation rate** of their peers without disability (72.8%).
- **Fewer than half were employed** (46.6%), though this was an improvement from 2018 when only 39.6% were employed.
- **Unemployment remained high:** at 19.3%, the rate was more than double that of young people without disability (7.7%).
- Young people (aged 15-24) were **more likely to be underemployed** than those aged 25-64.²

The measure for employer attitudes towards people with disability has regressed with 74 per cent of employers stating they value the contribution and benefits of employing someone with a disability in 2024 (compared to 77 per cent in 2022). Of more concern is this number is reduced to 62 per cent with regard to 15–24-year-olds, demonstrating additional prejudice towards young people with disability.³

In 2022, 58 per cent of young people with disability completed year 12 compared to 78 per cent without a disability.⁴

These barriers are structural – evidence that education and employment systems are not inclusive and inhibit rather than facilitate equitable participation opportunities and outcomes. This means that additional rights-based measures and safeguards are needed to ensure equitable workplaces for young people with disability.

CYDA's Summary of Recommendations

1. *Ensuring processes and services are responsive to the needs of young people with disability*

Recommendation 1.1 Design all new employment service streams to be accessible and disability affirming

Recommendation 1.2 Develop assessment and triaging processes that are person centred, holistic, and consultative

Recommendation 1.3 Consider both individual and structural factors during assessment and triaging processes

2. Consulting young people with disability in goals, plans, and service design

Recommendation 2.1 Collaborate with the participant in the development of the Employment Goal Plan to ensure it is meaningful, relevant, and targeted

Recommendation 2.2 Create positive engagement with mutual obligations by working collaboratively, not punitively

Recommendation 2.3 Include representation of lived user experience on commissioning panels and in monitoring and evaluation processes

3. Building provider and employer workforce capacity towards disability inclusion

Recommendation 3.1 Provide disability affirming training to frontline staff across service streams

Recommendation 3.2 Follow best practice models for employer provider engagement

Recommendation 3.3 Foster active linkages between employment services, trusted disability and intersectional supports.

CYDA's Recommendations in detail

1. Ensuring processes and services are responsive to the needs of young people with disability

This section responds to discussion paper questions 1,2,3,4, and 5.

Recommendation 1.1 Design all new service streams to be accessible and disability affirming

Young people with disability may access employment services in any of the new service streams, depending on their circumstances, level of need, and capacity at the time of access. The government can achieve its goal to differentiate employment services according to individual need by using a universal design approach across the whole service environment.

For each of the new service streams to be successful and sustainable, whether online, brief intervention, targeted or intensive, it is imperative their design is based on neuro-affirming and disability affirming principles.

All streams must provide written communication, including online and hard copy, in Easy Read, Auslan, screen reader compatible format, and large print/high contrast.⁵

Communication in person should support AAC users, young people who are D/deaf or hard of hearing, blind and low vision, DeafBlind, and those with intellectual disability and/or who require a support person.

Physical spaces must be accessible to young people who are wheelchair and mobility aid users, Blind or have low vision, D/deaf or hard of hearing, or have sensory processing requirements. Services should also be accessible for assistance animals, public transport and modified vehicle users.

Recommendation 1.2 Ensure that assessment and triaging processes are person-centred, holistic, and consultative

When considering the development of a new, high-quality assessment and triaging process, successful and sustained engagement requires young people with disability to be genuinely consulted and treated with dignity.

CYDA consultations demonstrate that young people with disability often feel infantilised, minimised, disbelieved and unsafe in the services they interact with, including employment services.⁶

In terms of effective employment support, young people within the CYDA community have previously recommended person-centred practice and holistic approaches to service delivery, prioritising the employment aspirations of service users.⁷

For example, when determining which employment stream the jobseeker should access, the jobseeker should be consulted and given the opportunity to nominate their preference.

When determining the factors or circumstances that should result in a participant moving between service streams, the assessor should similarly be guided by the job seeker, applying a holistic approach to understand their circumstances, goals, and intersectional barriers that may impact their employment opportunities.

Recommendation 1.3 Consider both individual and structural factors during assessment and triaging process

Relatedly, both individual and structural factors should be considered during the assessment process to support better identification of barriers to employment and triaging to the right service.

Throughout their life stages and pivotal transitions, children and young people with disability are denied equal opportunities to build capacity which would support them to secure employment in an increasingly competitive labour market. This includes, but is not limited to:

- Being denied a quality inclusive education from an early age, or segregated from their peers without disability
- Having opportunities withheld that would enable them to gain work experiences and build networks during school years
- Not being equally supported or encouraged to undertake post school education
- Being placed in environments in which people have consistently low expectations of them.

Differentiated service delivery can only succeed through an equity approach that recognises and responds to the disproportionate barriers to the labour market, and compounding impact of intersectional factors, experienced by young people with disability.

Involving young people with disability in goals, plans, and service design

This section responds to discussion questions 6,7,8,18, and 19.

Recommendation 2.1 Collaborate with the participant in the development of the Employment Goal Plan to ensure it is meaningful, relevant, and targeted

As per Australia's commitment to the Convention on the Rights of Persons with Disability, it is vital that young people with disability are involved in decisions that impact upon their lives⁸.

Previous CYDA consultations have demonstrated that young people with disability want suitable and meaningful work and want a say in defining their support needs.

"Our needs get met the best when we're the ones that get to define what they are." Young person at CYDA's National Youth Disability Summit 2020.

Young people with disability should be consulted in the creation of Employment Goal Plans, to ensure that the Plans are targeted towards career progression into jobs that are meaningful and relevant rather than simply "survival jobs". As young people from our community attest, employment goals should be tailored to the individual.⁹

Recommendation 2.2 Create positive engagement with mutual obligations by working collaboratively not punitively

CYDA recommends altering the phrase “mutual obligation” to reflect the new proposed activities that will form part of a person’s Employment Goal Plan. CYDA has previously provided feedback on the detrimental impact of government welfare models that use punitive deterrence-based language, as outlined in CYDA’s submission on self-directed supports¹⁰. Moving away from the welfare-based language of blame will enable a more collaborative relationship between young people with disability and employment services.

Mutual agreement of the elements of the Employment Goal Plan must not dismiss what the young person with disability states they have capacity for.

Positive engagement with mutual obligations by participants who are young people with disability requires working collaboratively, not punitively, and ensuring that the obligations flow both ways—that providers, government, and participants all have a duty of care to one another and are working towards common goals.

It is also critically important that people are not forced into compliance regardless of potential adverse effects, such as falling further into poverty and needing to divert job-seeking capacity into daily survival activities. Compliance has also been linked to mental health harm for young people with disability whose unique circumstances do not always match the requirements, such as combining work and study thereby needing part-time or casual work.¹¹

Recommendation 2.3 Include representation of lived user experience on commissioning panels and in monitoring and evaluation processes

CYDA strongly recommends lived experience representation from a range of participants, including young people with disability, and the use of co-design principles where appropriate.¹²

When considering which commissioning and contracting approaches will best support increased provider diversity, CYDA recommends that the Department follow the best practice approach of including lived user experience positions on commissioning panels. Best practice examples include the Australian Capital Territory Government’s panel for including lived experience in the human services and health sectors as well as the New South Wales framework for embedding lived experience across the mental health service sector.¹³

Similarly, employment services can foster continuous improvement and improve the sharing of best practice through involving participants, including young people with disability, in testing, monitoring, and evaluation processes. Young people want to see clear mechanisms for feedback and continuous improvement in employment services.¹⁴

2. Building provider and employer workforce capacity

This section responds to discussion questions 9, 13, and 14.

Recommendation 3.1 Provide disability affirming training to frontline staff across streams

To meet the needs of the high number of young people with disability requiring employment services, CYDA recommends that disability affirming training is provided to frontline staff across all new employment streams.

Young people with disability want services that are informed about their experiences and can offer them solutions that are flexible and tailored to them as individuals. Young people have told CYDA that a successful employment service should provide supports that align with their identity and values and recognise that they can make effective choices for themselves. This includes their experiences of disability but crucially incorporates intersectional understandings to ensure services are culturally safe and affirming, LGBTIQ+ friendly and accessible to young people with a broad range of identities and life experiences.¹⁵

Building the capacity of all frontline staff to relate and offer services within a rights and strengths-based framework ensures that people with disability are treated according to their legal right to access services that accommodate their disability and prevents discrimination across the sector. A rights and strengths-based approach will also likely filter into the culture of employers, creating new norms that better support young people with disability. Other recommended approaches include:

- Use of peer workers as per mental health models to operationalise a place-based, individualised approach.¹⁶
- Include training for understanding the needs that arise from intersectional experiences.

“The lack of an intersectional lens: so often you're viewed as just a disabled person, which I am a disabled person and happy to be seen that way. But when I'm also like, well I'm also trans, and I'm also gay, and like I need a workplace that's affirming of those parts of my identities. It is too complex, too overwhelming for other people to handle and then support”. Lived X – employment paper¹⁷

- Increasing sense of safety: multiple peer reviewed studies demonstrate that experiencing a sense of felt safety is linked to increased engagement across organisational contexts such as public spaces, education, virtual meetings, and communication in medical teams.¹⁸

Previous CYDA consultations have shown that young people with disability want employment services with the capacity and awareness to support them. Specifically, young people want employers and employment service providers to strengthen their disability capability by:

- Acknowledging and addressing the barriers they face in accessing employment
- Building and maintaining strong disability expertise so they are not expected to educate service providers
- Embedding proactive accessibility and universal design to remove bureaucratic, procedural and social barriers
- Building the capability of mainstream employment service providers by promoting established best practice resource hubs for people with Intellectual Disability, such as the Centre for Inclusive Employment¹⁹
- Delivering person-centred, strengths-based support that responds to each young person's goals and aspirations, free from ableist assumptions
- Facilitating peer mentoring and connections with people with lived experience of disability to provide practical guidance, encouragement and role modelling²⁰.

Recommendation 3.2 Follow best practice models for employer provider engagement

CYDA recommends the Department fund models such as DREAM Network and Disability Employment Hub as outlined in CYDA's submission on Supporting Rights-Based Employment designed and delivered by CYDA and Social Ventures Australia's (SVA)²¹. This would enable employment services to partner with these organisations and others to leverage these models and deliver individualised support.

These models connect employers with jobseekers who are young people with disability, creating networks, promoting awareness, and breaking down deficit approaches and stereotypes.

Partnerships with industry and employers can also focus on the other half of the equation for reducing the job seeker's distance from the labour market by addressing the barriers created through bias and prejudice in work environments. Mutual obligation activities to date have been heavily focused on job seekers, with their distance from the job market being attributed to their individual characteristics and circumstances. This policy approach is one-sided.

Recommendation 3.3 Foster active linkages between employment services, trusted disability and intersectional supports

Into the future, employment services could better understand and accommodate the needs of diverse cohorts, including better linkages to other services, by actively fostering and nurturing connections with trusted disability and intersectional supports.

These services include disability employment services (such as Inclusive Employment Australia), settlement providers for multicultural communities, Aboriginal Community Controlled Organisations, and LGBTIQ+ service providers.

For diverse cohorts who may have experienced marginalisation in mainstream settings, the provision of supports by trusted providers and continuity of care is crucial to deliver meaningful outcomes.

As disability supports become more spread out across a range of providers and settings as changes to the NDIS are implemented, it is important that systems and services work together and develop trusted relationship for successful service provision.

Thank you again for the opportunity to make a submission. If you have any questions about CYDA's submission, please contact CYDA's Policy and Research Manager at lizhudson@cyda.org.au.

Yours sincerely

A handwritten signature in black ink, consisting of stylized, overlapping loops and a trailing flourish.

Skye Kakoschke-Moore

CEO, Children and Young People with Disability Australia

Endnotes

- ¹ United Nations Convention on the Rights of Persons with Disabilities, 30 March 2007. [Article 27 – Work and employment](#), New York [2008].
- ² CYDA, 2026. Key Statistics Report: [Snapshot of children and young people with disability in Australia](#)
- ³ Australian Institute of Health and Welfare, 2025. [Australia's Disability Strategy Outcomes, Community Attitudes: Employer Attitudes](#)
- ⁴ Australian Institute of Health and Welfare, 2025. [Australia's Disability Strategy Outcomes, Education and Learning](#)
- ⁵ Australian Human Rights Commission, 2021. [Creating accessible and inclusive communications](#) and [Creating an accessible and inclusive workplace](#)
- ⁶ CYDA, 2021. [LivedX 2022 series: Full policy paper – Financial security and employment](#)
- ⁷ Ibid
- ⁸ CYDA, 2021. [National Disability Employment Strategy consultation](#)
- ⁹ CYDA, 2022. [LivedX 2022 series: Full policy paper – Financial security and employment](#)
- ¹⁰ CYDA, 2025. [Submission on Self-Directed Supports](#)
- ¹¹ Education and Employment References Committee, 2018. [Jobactive: failing those it is intended to serve](#)
- ¹² Altman, T., Hunter, S., & Gay, M., 2026. From Tokenism to Transformation: Relational Guiding Principles for Genuine Co-Design with Young People with Disability Through a Critical Disability Lens. *Youth*, 6(2), 57. <https://doi.org/10.3390/youth6020057>
- ¹³ ACT Government, 2024. [Lived Experience Engagement Advisory Panel](#); NSW Government, 2018. [Lived Experience Framework for NSW](#)
- ¹⁴ CYDA, 2022. [Submission to the consultation of the New Disability Employment Support Model](#)
- ¹⁵ CYDA, 2023. [Submission to the consultation on the draft Quality Framework for the Disability Employment Services Program](#)
- ¹⁶ Mind Australia, 2026. [Peer Work at Mind](#)
- ¹⁷ CYDA, 2021. [LivedX 2022 series: Full policy paper – Financial security and employment](#)
- ¹⁸ Morton, L, Et. Al., 2022. A new measure of feeling safe: Developing psychometric properties of the neuroception of psychological safety scale. *Psychological Trauma: Theory, Research, Practice, and Policy*. <https://psycnet.apa.org/doi/10.1037/tra0001313>
- ¹⁹ [Centre for Inclusive Employment, Australia](#)
- ²⁰ CYDA, 2022. [Submission to the consultation of the New Disability Employment Support Model](#)
- ²¹ CYDA, 2025. [Submission on Supporting Rights-Based Employment for Young People with Disability](#)