

Department of Employment and Workplace Relations
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21 October 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) draft Secure Australian Jobs Framework (the Framework) consultation. 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.

Background: Employment barriers for young people with disability

Young people with disability are one of the most marginalised cohorts in the labour market. They are more than twice as likely to be unemployed as their same-aged peers without disability, with only 58 per cent participating in the labour force (compared with 73 per cent of non-disabled young people).¹ Nearly half of young people with disability aged 15 to 24 years (49 per cent) rely on income support payments as their main income (compared with 14 per cent of those without disability).² Only 20 per cent of NDIS participants aged 15-24 years are employed.³

Almost three quarters (74.3 per cent) of young people with disability aged 20-24 years have completed year 12 (compared with 87.4 per cent of non-disabled young people); only 23 per cent of 20–24-year-olds with disability are enrolled in university or other higher education, and 9.6 per cent in TAFE.⁴ This impacts upon workforce participation, with evidence showing that a bachelor's degree increases chances of people with disability being employed by 34.4 per cent.⁵

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). This number is reduced even further to 62 per cent when applied to 15–24-year-olds, demonstrating additional prejudice towards young people with disability.⁶

This evidence demonstrates that employment systems are not inclusive, and inhibit rather than facilitate equitable participation opportunities and outcomes. This means that additional measures and safeguards are needed to ensure equitable and inclusive workplaces for young people with disability.

CYDA's work on employment

In this submission we draw on our previous work related to inclusive employment:

- CYDA's (2026) [Submission on Shaping the Future of Employment Services](#)
- CYDA's (2026) [Submission to the Fair Work Amendment \(Right to Work from Home\) Bill 2025](#)
- CYDA's (2025) [Submission on Strengthening the Disability Discrimination Act for Children and Young People with Disability](#)
- CYDA's (2025) [Submission on Supporting Rights-Based Employment for Young People with Disability](#)
- CYDA's (2025) [Submission to Jobs and Skills Australia Workplan 2025-26](#).

CYDA consistently hears from young people with disability and their families that they must have the same rights and opportunities as their non-disabled peers to access meaningful, inclusive, and sustainable employment. For the draft Framework to enable this, it must make targeted provisions for young people with disability.

General comment

CYDA welcomes the draft Framework as a mechanism to provide guiding principles and indicators for good practice in Commonwealth procurement. We view this as a positive development towards fostering and developing more inclusive workplaces.

Our feedback relates to the draft Framework component of the consultation, with a specific focus on Principles 3 and 4. We propose that the draft Framework be strengthened to recognise the substantial employment-related barriers faced by

young people with disability, by making inclusive amendments to Principle 3 (Safe and Healthy Workplaces) and Principle 4 (Support Gender Equality and Diversity).

CYDA's summary of recommendations

1. Amendments to Principle 3

Recommendation 1.1 *Change wording of Principle 3 to include reference to inclusion as a key component of safe and healthy workplaces*

Recommendation 1.2 *Add disability indicators to the list of Principle 3 good practice indicators*

2. Amendments to Principle 4

Recommendation 2.1 *Change wording of Principle 4 to include reference to inclusion as a key component of promoting diversity*

Recommendation 2.2 *Add disability indicators to the list of Principle 4 good practice indicators, with specific reference to young people with disability*

CYDA's recommendations in detail

1. Amendments to Principle 3

Recommendation 1.1 *Change wording of Principle 3 to include reference to inclusion as a key component of safe and healthy workplaces*

For workplaces to be safe and healthy for all workers, they must also be inclusive. Inclusive workplaces include, but are not limited to, features such as:

- Workplace policies and guidelines on accessibility and inclusivity
- Disability and neuro-affirming training for employers and staff
- Disability-specific accommodations and adjustments, such as the provision of equipment to conduct work safely (e.g., noise-cancelling headphones, standing desks), or the need for work from home
- Provision of work materials in accessible formats including online and hard copy, in Easy Read, Auslan, screen reader compatible format, and large print/high contrast
- Communication in person that supports AAC users, 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 that are accessible to 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.

For young people with disability, accessible and inclusive workplace policies and training, combined with reasonable accommodations such as materials in advance, sensory supports (e.g., noise cancelling headphones), and working from home⁷ are commonly cited as enabling workforce participation.⁸

CYDA recommends that the draft Framework Principle 3 is amended to:

“Safe, Healthy, **and Inclusive** Workplaces”.

Similarly, the description at 3.1 should also incorporate inclusion, see example wording:

“3.1 Manage work health and safety **inclusively**. Suppliers must comply with all applicable work health and safety (WHS) laws and ensure they are providing healthy, safe, and **inclusive** work environments for their workers.”

Recommendation 1.2 Add disability indicators to the list of Principle 3 good practice indicators

CYDA recommends that disability indicators are added to the draft Framework Principle 3 good practice indicators. This would entail adding an indicator with example wording as follows:

“Suppliers have processes and training in place to ensure they are inclusive and accessible to people with disability.”

2. Amendments to Principle 4

Recommendation 2.1 Change wording of Principle 4 to include reference to inclusion as a key component of promoting diversity

Diversity policies at all levels of government have increasingly moved towards an intersectional understanding, where gender is one among a holistic set of diversity indicators and equity cohorts including (but not limited to) First Nations, multicultural, LGBTIQ+, disability, and regional/remote. Moreover, Diversity, Equity and Inclusion portfolios (DEI) use the language of equity not equality, to recognise that these cohorts do not have equal starting points.⁹

As you would be aware, this is also the case for the Department of Employment and Workplace Relations, [as detailed on your website under Diversity and Inclusion](#).

While the draft framework considers gender equality and includes mention of culturally and linguistically diverse and First Nations communities, disability and LGBTIQ+ communities are missing.

This is of significant concern to CYDA, as many young people with disability identify as LGBTIQ+ and are therefore doubly invisible under the current draft Framework.¹⁰

CYDA recommends that the draft Framework Principle 4 is broadened and amended to be in line with current best practice in DEI, to support a whole-of-government aligned approach and ensure consistency within the Department itself.

Example wording could be as follows:

“Promote Diversity, **Equity and Inclusion**.”

Similarly, the description at 4.1 should also incorporate equity and inclusion, see example wording:

“3.1 Act to improve **diversity, equity, and inclusion** in the workplace. Suppliers demonstrate an ongoing commitment to embed systems and practices that promote **diversity, equity, and inclusion** in the workplace.”

Recommendation 2.2 Add disability to the list of Principle 4 good practice indicators, with specific reference to young people with disability

CYDA recommends that disability indicators are added to the draft Framework Principle 4 good practice indicators. This would entail adding an indicator with example wording as follows:

“Suppliers set targets to improve the representation of people with disability, especially young people with disability who face additional barriers to workforce participation.”

Together, we hope that our proposed recommendations to strengthen the focus on inclusion, intersectionality, equity, and disability in Principles 3 and 4 of the draft Framework work to align it with best practice across government, and set the standard for employers to build and maintain inclusive workplaces.

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 blue ink, appearing to read 'Skye Kakoschke-Moore', with a stylized, cursive script.

Skye Kakoschke-Moore

CEO, Children and Young People with Disability Australia

Endnotes

- ¹ Australian Bureau of Statistics (2022) [Children and young people with disability](#)
- ² Australian Institute of Health and Welfare (2019) [People with disability in Australia](#)
- ³ AIHW (2025) [Young NDIS participant employment](#)
- ⁴ Buckland et al. (2024) [Employment and disability in Australia](#). Bankwest Economics
- ⁵ Buckland et al. (2024) [Employment and disability in Australia](#). Bankwest Economics
- ⁶ Australian Institute of Health and Welfare (2025) [Australia's Disability Strategy Outcomes Framework: Employer attitudes](#)
- ⁷ The Committee for Economic Development of Australia (2024) [Economic and policy outlook](#)
- ⁸ Social Ventures Australia (2024) [Voices on work: Young people with disability in Greater Melbourne](#); CYDA (2022) [Lived X papers: Employment and financial security](#)
- ⁹ At the federal level see for example, Department of Health, Disability and Ageing [Inclusion Framework 2025-30](#); Department of Infrastructure [Diversity, Equity and Inclusion Strategy 2025-28](#); Department of Home Affairs [Inclusion, Diversity and Equity Strategy 2024-29](#); Department of Foreign Affairs and Trade [Inclusion, Equity and Diversity Strategy 2024-2027](#). This is replicated at state and local government levels.
- ¹⁰ Australian Institute of Family Studies (2026) [Supporting LGBTQ+ young people with disability: What service providers need to know](#); Australian Centre for Research in Sex, Health and Society (2021) [Writing themselves in 4 Report](#).