

Shaping the future of employment services

Submission to the Department of Employment
and Workplace Relations

31 July 2026

Contents

Executive summary	5
Recommendations	5
1 Introduction	7
The right to work	7
Employment service providers in Australia	8
2 Measuring Sustainable Employment Outcomes	10
Expanding job quality indicators to drive meaningful outcomes	10
3 Employment Service Providers	12
Building the capability of employment service providers to deliver inclusive and responsive services	12
4 Shifting Employer Practices: Demand-Side Reform	14
Reframing employment outcomes as a shared responsibility between employment service providers and employers	14
Strengthening employer obligations and workplace capability	16
Addressing the structural exclusion of older Australians	17
Endnotes	20

Australian Human Rights Commission www.humanrights.gov.au

ABN 47 996 232 602

Level 3, 175 Pitt Street, Sydney NSW 2000

GPO Box 5218 Sydney NSW 2001

For general enquiries, call us on 1300 369 711.

For complaints, call us on 1300 656 419.

For TTY, call 1800 620 241.

Acknowledgement of Country

The Australian Human Rights Commission acknowledges the Traditional Custodians of Country throughout Australia, and recognise their continuing connection to land, waters and culture. We pay our respects to their Elders – past and present.

About the Australian Human Rights Commission

Our vision for Australia is one where everyone can live free and equal in dignity and rights as part of a strong, healthy democratic society.

We have 4 core functions under our legislation:

- Access to justice: We help people to resolve complaints of discrimination and human rights breaches through our complaint handling services.
- Fairer laws, policies and practices: We review existing and proposed laws, policies and practices and provide expert advice on how they can better protect people's human rights. We help organisations to protect human rights in their work. We publish reports on human rights problems and how to fix them.
- Education and understanding: We promote understanding, acceptance and public discussion of human rights. We deliver workplace and community human rights education and training.
- Compliance: We are the regulator for positive duty laws requiring employers and others to address sexual harassment, sex discrimination and other unlawful conduct.

Australian Human Rights Commission www.humanrights.gov.au

ABN 47 996 232 602

GPO Box 5218 Sydney NSW 2001

For general enquiries, call us on 1300 369 711.

For complaints, call us on 1300 656 419.

For TTY, call 1800 620 241.

Executive summary

1. The Australian Human Rights Commission (Commission) welcomes the opportunity to provide this submission to the Department of Employment and Workplace Relations' (the Department) consultation on the *Shaping the future of employment services* discussion paper.
2. The Commission has a long-standing commitment to ending discrimination in the workplace that inhibits the recruitment and retention of people, and especially discrimination based on age, disability, race or gender. We have extensive work underway to remove discrimination against older workers and workers with disability and to create inclusive, productive workplaces across Australia.
3. We support the vision of the discussion paper to create a more effective and responsive employment services system. Achieving inclusive and sustainable employment outcomes for mature-age workers and workers with disability requires service delivery models that recognises their skills, removes barriers to participation in employment and protects them from discrimination.
4. This submission identifies critical areas where reform of employment service settings can meaningfully improve outcomes for workers, with a focus on older workers and people with disability.
5. Central to this submission is the view that discrimination law reform and targeted investment in employer capability are essential to building workplaces that are inclusive and accessible. This submission emphasises that employment services cannot deliver sustainable outcomes for job seekers without a parallel commitment to addressing the demand-side conditions that continue to exclude older workers and people with disability from meaningful employment.

Recommendations

6. The Commission makes the following recommendations.

Recommendations

1. The Department extend post-placement monitoring protocols to capture a broader range of job quality indicators at 12, 26 and 52 weeks post-placement. Current measures should be expanded to include access to training and professional development, adequacy of workplace adjustments, and hours worked relative to hours desired.
2. The Department provide targeted training to employment service providers to ensure the experiences of discrimination faced by job seekers are recognised as structural barriers.

3. The Department expand wraparound support guidelines to incorporate referral pathways to affordable care services for workers with care responsibilities.

4. The Australian Government reform:
 - The *Age Discrimination Act 2004* (Cth), the *Disability Discrimination Act 1992* (Cth), and the *Racial Discrimination Act 1975* (Cth) by introducing a positive duty to prevent and eliminate all forms of discrimination in employment.
 - The *Sex Discrimination Act 1984* (Cth) to expand the existing positive duty so as to cover all protected attributes.

5. The Australian Government implement specific measures and dedicated funding to increase employer demand, capability, and the development of inclusive, accessible workplace cultures that uphold the rights and meet the needs of employees.

6. The Department develop an age-inclusion strategy to drive age-inclusive employment practices in recruitment and retention of older workers.

7. The Department fund, as a priority, a range of pilots or proof of concept initiatives to support best practice in the recruitment and retention of older workers.

1 Introduction

The right to work on an equal basis with others is established in international human rights instruments and reflected in Australia's federal anti-discrimination framework, yet significant gaps remain in how these protections are realised in practice. Current employment service models have consistently failed to deliver equitable outcomes for older workers and people with disability, reflecting structural shortcomings that this submission seeks to address.

The right to work

International human rights obligations

7. The right to work on an equal basis with others is a fundamental universal human right recognised in international human rights treaties. It is inseparable from human dignity and is interdependent on the realisation of other human rights, including the rights to an adequate standard of living, physical and mental health, and full participation in community life.
8. The right to work is affirmed across a range of international instruments to which Australia is a party. The *International Covenant on Economic, Social and Cultural Rights* provides the foundational basis for the right to work, guaranteeing all people the opportunity to earn a living through freely chosen work, free from discrimination, and with access to just and favourable working conditions.¹
9. Thematic treaties, such as the United Nations *Convention on the Rights of Persons with Disabilities*² and the United Nations *Convention on the Elimination of All Forms of Discrimination against Women*³ elaborate on these protections with respect to disability and gender.

Australia's federal anti-discrimination framework

10. Australia's federal anti-discrimination framework is comprised of the *Age Discrimination Act 2004* (Cth), the *Disability Discrimination Act 1992* (Cth), the *Sex Discrimination Act 1984* (Cth) and the *Racial Discrimination Act 1975* (Cth). The framework establishes foundational anti-discrimination obligations for employers across the country. Additional protections are contained in the *Fair Work Act 2009* (Cth).

Recognising the intersecting dimensions of disadvantage in employment

11. The experience of discrimination in employment is rarely one-dimensional. Ageism and ableism frequently intersect, and for many people, these intersect

further with gender, race and other characteristics to produce compounding and distinct barriers to employment.

12. Older women, for example, often face specific structural barriers to financial security in employment, including the cumulative effects of gender-based workforce interruptions on superannuation, career progression and long-term economic participation.⁴ First Nations people experience the impacts of ageing and age-related illness earlier than others.⁵
13. For many job seekers, these intersecting factors can give rise to highly specific barriers that require tailored and culturally safe responses from employment services. An employment services framework that does not account for these intersecting experiences risks replicating, rather than remedying, structural inequality.

Embedding human rights in the design and delivery of employment services

14. Employment services are a key mechanism for labour market participation, making them a site at which human rights obligations are either upheld or undermined. A reformed employment services framework presents a significant opportunity to ensure that services are designed and delivered without discrimination, and in a manner that is person-centred and consistent with Australia's obligations under both domestic and international laws.
15. Critically, non-discrimination means being proactive by removing barriers to participation, rather than being reactive and only avoiding discriminatory conduct. The extent to which the current system has met these standards, and the reforms necessary to ensure the proposed framework does so, are addressed in the sections that follow.
16. Changing employer attitudes, including removing ageism and ableism from workplaces, removing biases from recruitment practices and changing workplace practices and development opportunities will be critical to achieving sustained placements for older workers and workers with disability.

Employment service providers in Australia

Persistent gaps in service delivery

17. The *Shaping the Future of Employment Services* discussion paper articulates aspirations for targeted delivery and wraparound support – principles that also informed the 2022 transition from jobactive to Workforce Australia. To date, these aspirations have not translated into meaningful workforce participation for older workers and people with disability.

18. Discrimination in hiring practices, inadequate post-placement monitoring, inflexible service delivery models and a lack of demand-side employer interventions combine to create a system that fails to support sustainable employment outcomes for all job seekers.
19. As job mobility declines with age,⁶ older workers may remain in poor-quality placements that appear successful in short-term metrics while experiencing conditions that undermine long-term workforce participation, health and financial security.
20. These systemic failures are particularly acute for people with disability, with Australia having one of the lowest employment rates for people with disability in the OECD.⁷ Labour force participation rates of people with disability increased by 5.6% between 1993 and 2022, but remain significantly lower than people without disability,⁸ reflecting the failure of workplaces and employment systems to accommodate and value their participation.
21. Labor force participation rates for older workers have been rising but too slowly to recognise the ageing of the Australian society, address workforce shortages particularly in the care economy, and stem lost productivity through the loss of a skilled and experienced labour pool.
22. The loss of opportunities for the recruitment and retention of older workers diminishes the ability of such people to enter older age in a financially secure position and to live long lives with security.
23. Failure to address barriers to workforce participation has significant economic and social consequences, including lost productivity nationally and at firm level, heightened fiscal pressure on age pension expenditure, reduced tax revenue and poorer health outcomes for individuals forced into premature workforce exit.
24. These shortcomings are not isolated – they reflect a system that has not yet been designed with the full range of its participants' rights and circumstances in mind, nor adequate attention to the attitudes, practices and cultures within Australian workplaces. Addressing these matters will reap large benefits for Australia and its people, both economically and socially.

2 Measuring Sustainable Employment Outcomes

Current performance frameworks prioritise placement rates over job quality, creating accountability gaps that disproportionately affect older workers. We recommend extending mandatory post-placement monitoring to 52 weeks and incorporating expanded job quality indicators to support placement longevity, enable timely intervention and redirect provider incentives.

Expanding job quality indicators to drive meaningful outcomes

Current performance framework limitations

25. Current performance frameworks for employment service providers focus heavily on job placement as the primary success metric. Depending on their licence arrangement, some providers are rated on job satisfaction at 12 and 26 weeks post-placement, but this is not universal across the employment service system and does not capture the full spectrum of measures of employment quality.
26. This creates a significant gap in measurement and accountability because providers are not required to demonstrate that placements are sustainable, appropriate to workers' needs, or of sufficient quality to support long-term workforce participation.
27. Given that job mobility declines sharply with age,⁹ older workers may remain in placements even when job quality is low and opportunities for professional development are limited. Under existing short-term metrics, these workers may appear as having 'successful' placements despite experiencing poor job fit that undermine long-term workforce participation.

Aligning performance frameworks with participant-directed goals

28. We welcome the discussion paper's commitment to embedding a new, meaningful goal plan at the centre of the participant experience, and the recognition that meaningful, individualised employment goals and tailored service pathways are essential to effective service delivery. This approach also reflects the human rights principle of participation, or that people should be involved in decisions that affect their lives.
29. We hope this commitment will translate into plans that are genuinely self-directed, where participants are empowered to define their own goals based on their unique needs, preferences and aspirations, rather than goals that are oriented toward rapid job placement.

Expanding job quality indicators to drive meaningful outcomes

30. Performance frameworks should reinforce, rather than undermine, participant agency, which is why we recommend expanding the scope of job quality indicators and extending the post-placement monitoring horizon to 52 weeks.
31. Extending post-placement monitoring from 26 weeks to 52 weeks post-placement will help to identify sustained employment quality issues that short-term measures may overlook. This monitoring can be used to inform future placement strategies for similar cohorts, drive continuous improvement in provider practices and facilitate timely intervention to support placement quality and longevity.
32. Post-placement data capture should be broadened to include additional measures of job quality, including access to training and professional development, adequacy of workplace adjustments (where relevant), and hours worked relative to hours desired. These extended measures would provide a more accurate picture of employment outcomes for workers and create incentives for providers to prioritise sustainable, quality placements.

Recommendation 1: The Department extend post-placement monitoring protocols to capture a broader range of job quality indicators at 12, 26 and 52 weeks post-placement. Current measures should be expanded to include access to training and professional development, adequacy of workplace adjustments, and hours worked relative to hours desired.

3 Employment Service Providers

Building the capability of employment service providers to deliver inclusive and responsive services

Equipping employment service providers to recognise structural barriers to participation

33. The discussion paper proposes a three-stream model in which job seekers are organised according to their assessed distance from the labour market.
34. While the three-stream model represents a significant change to how job seekers are assessed and supported, it needs to recognise and respond to the structural barriers that shape labour market participation.
35. Employment service providers should be provided with appropriate training to ensure that the systemic experiences of discrimination that many job seekers face are not misread as indicators of distance from the labour market.
36. Where employment service providers lack the capability to distinguish structural disadvantage from individual work readiness, the three-stream model risks reproducing, and potentially entrenching, the exclusion it is designed to address.

Recommendation 2: The Department provide targeted training to employment service providers to ensure the experiences of discrimination faced by job seekers are recognised as structural barriers.

Enabling employment service providers to connect job seekers with local support

37. The discussion paper proposes a new approach to assessment of job seekers, which would entail gathering information about how personal circumstances (such as caring responsibilities, health conditions and other factors) influence a participant's capacity to look for work.
38. This is a welcome step, and we recommend that the capacity of employment service providers be built to respond meaningfully to this information, including through information and referral services to identify subsidised or community-based care and support in their local area.
39. Research consistently demonstrates that unpaid caring has substantial impacts on an individual's capacity to work:
 - The majority of Australia's carers are aged between 45 and 64 years.¹⁰
 - Caring responsibilities within this cohort are distinctly gendered, with older women significantly more likely than older men to have left the

workforce due to caring responsibilities and to face compounding barriers to re-entry.¹¹

- A large proportion of older workers are also managing concurrent caring responsibilities, combining care for older relatives with care for dependent children and grandchildren.¹²
- Of Australia's 1.2 million primary carers, 43.8% have disability themselves, meaning that many are navigating the demands of caring while also managing their own participation barriers.¹³

40. Recognising the impact of caring responsibilities on job seekers' capacity to work is essential to realising the potential of training programs and improving the accessibility of employment services. Access to affordable early childhood education and care, disability and aged care services is fundamental to enabling workforce participation for people with care responsibilities.¹⁴

Recommendation 3: The Department expand wraparound support guidelines to incorporate referral pathways to affordable care services for workers with care responsibilities.

4 Shifting Employer Practices: Demand-Side Reform

Employment services reform will only deliver sustainable outcomes if it is matched by meaningful action on the demand side. This section outlines the Commission's recommendations to reform Australia's discrimination law framework, strengthen employer obligations and capability, and invest in the conditions that enable inclusive and accessible workplaces. A national age inclusion strategy is proposed as a necessary complement to employment services reform, recognising that older Australians face labour market barriers that required a dedicated and coordinated policy response.

Reframing employment outcomes as a shared responsibility between employment service providers and employers

Supply-side focus has failed to address structural exclusion

41. Employment services in Australia have historically been supply-side focused¹⁵, with primary interventions focused on making job seekers more employable through skills development, resume assistance and job-matching support. Supply side interventions are necessary, but are insufficient to address discrimination in hiring, retention and development.
42. Effective employment policy must address both supply and demand. While current government initiatives largely focus on improving job seeker readiness and qualifications, the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (Disability Royal Commission) found that pervasive negative attitudes and low expectations among employers had the most significant impact on the employment and life outcomes for people with disability.¹⁶
43. Similarly, the evaluation of the first phase of the Commission's *Equality at Work* project (formerly IncludeAbility) found that 'the biggest barrier for a person with disability is low expectations of the employer'.¹⁷ The evaluation highlighted that a general lack of awareness about disability and lack of contact with people with disability frequently act as drivers of negative attitudes about their employment potential.¹⁸
44. The Disability Royal Commission also heard that some people with disability who had worked in both Australian Disability Enterprises (ADEs) and open employment chose to return to ADEs, despite lower wages received, because of the harassment, discrimination and social isolation they experienced in open employment.¹⁹

45. Similar discriminatory attitudes exist towards older workers: 28% of Human Resource professionals in Australia cite reluctance to hire older workers on the basis that they 'have too much experience'.²⁰
46. Age discrimination is not confined to the hiring stage; it shapes the experience of older workers throughout the employment lifecycle. Once in employment, older workers often lack career support. In recent research, only 50% of older workers reported having the opportunity to participate in career development activities and only 18% had access to mentors.²¹ Further upskilling of older workers is unlikely to support employment outcomes if this is not matched with employer interventions.
47. Taken together, these patterns suggest that ableist and ageist assumptions are a systemic feature of workplace cultures and require a proactive approach. We also acknowledge that racism and sexism remain ongoing barriers to workforce participation, reinforcing that discrimination in the workplace is systemic in nature and cannot be addressed through reactive measures alone. Stronger legal obligations have the potential to uplift employer capabilities in this regard.

A positive duty to prevent discrimination would drive systemic change

48. Existing federal discrimination law, built around reactive complaint-based mechanisms, has been unable to dismantle the systemic exclusion of older workers and people with disability from meaningful workplace participation.
49. The discussion paper's vision of a more effective and responsive employment services system should be complemented by a strengthening of legal obligations to shift employer responsibility from reactive compliance toward the proactive prevention of discrimination.
50. We reiterate our view that a positive duty to take reasonable and proportionate measures to eliminate all forms of unlawful discrimination should be introduced into all federal discrimination laws.²² By placing this duty across all discrimination laws, clear and consistent expectations would be set that employers and businesses act without discrimination and pre-emptively consider and address risks of discrimination before they arise. We continue to advocate for a positive duty that would cover all areas of public life that are protected under discrimination law, but, in light of the scope of this consultation, we limit our recommendation to a positive duty in employment as a priority area.

Recommendation 4: The Australian Government reform:

- **the *Age Discrimination Act 2004* (Cth), the *Disability Discrimination Act 1992* (Cth), and the *Racial Discrimination Act 1975* (Cth) by introducing a positive duty to prevent and eliminate all forms of discrimination in employment.**

- **the *Sex Discrimination Act 1984* (Cth) to expand the existing positive duty so as to cover all protected attributes.**

Strengthening employer obligations and workplace capability

Reasonable adjustments are inconsistently provided by employers

51. Employers have obligations under the *Disability Discrimination Act 1992* (Cth) to provide reasonable adjustments to workers with disability.²³ This applies to all workers with disability and is not limited to workers eligible for disability employment services (which are beyond the scope of this consultation).
52. However, the Disability Royal Commission²⁴ and other inquiries²⁵ evidenced the extent of discrimination in employment. Many employers across industries lack the knowledge, experience, and willingness to offer meaningful and safe workplaces and conditions to people who need adjustments.

Supporting older workers to sustain safe and productive employment

53. Many older workers require changes to how and when they work to sustain safe and productive employment, but employer capability and confidence to support this remains low. For older workers in blue-collar and pink-collar roles in particular, the threshold of weekly hours beyond which mental health and vitality decline is 7-9 hours lower than for white-collar workers.²⁶ For this reason, many older workers require adjustments such as ergonomic modifications, flexible hours or modified duties to sustain employment. Access to such adaptations is associated with greater employee productivity, wellbeing²⁷ and mental health.²⁸
54. While the right to request flexible working arrangements exists under the *Fair Work Act 2009* (Cth), it does not automatically translate into successful workplace negotiations,²⁹ particularly for job seekers who feel they have limited bargaining power or fear flexibility stigma.
55. Building employer capability to meet obligations by creating inclusive and accessible employment should be part of the placement process from the outset. Supports for employers will lead to more sustainable employment outcomes and reduce the risk of placements breaking down due to discrimination and unaddressed needs.

Targeted pilot programs demonstrate what inclusive employer practice looks like in action

56. The Commission's own pilot programs, including its *Equality at Work* project, demonstrate that targeted, employer-facing investment can drive measurable improvements in placement quality and workplace inclusion for people with disability.
57. *Equality at Work* is co-designed with people with disability and leverages their expertise to inform employer practices and build inclusive workplace cultures. All pilot employment opportunities are in open employment and offer competitive wages that are at or above the national minimum wage.
58. Through the project, we provide tailored support to participating employers, drawing on our statutory expertise in human rights and our experience in conciliating disability discrimination complaints. This support includes training, guidance on inclusive recruitment and workplace adjustments. The pilots also establish communities of practice, enabling employers to share insights and build sector-wide capability.
59. The *Equality at Work* pilots offer a practical prototype for addressing the barriers people with disability face in accessing equal employment opportunities. They equip organisations to assess and improve their policies, practices and processes to uphold the rights of their employees with disability.
60. Such pilots would equally benefit older workers.

Recommendation 5: The Australian Government implement specific measures and dedicated funding to increase employer demand, capability, and the development of inclusive, accessible workplace cultures that uphold the rights and meet the needs of employees.

Addressing the structural exclusion of older Australians

A national age inclusion strategy would create the conditions for sustainable employment outcomes

61. We recommend that the Department develop a national age-inclusion strategy to drive inclusive employment practices across recruitment, retention and reporting. Such a strategy should include:
 - Partnering with employers that demonstrate positive job quality outcomes for older workers to understand supportive practices
 - Age-inclusive recruitment guidance for employers, that includes information about common hiring practices that may embed ageist assumptions in the screening process

- Specific recognition of the need to provide ongoing upskilling, training and opportunities, especially in relation to emerging technologies and AI
 - Reporting on age diversity metrics to enable transparency and accountability in hiring and retention practices.
62. Critically, any national age inclusion strategy should adopt an intersectional focus, recognising that older workers do not experience age-related barriers to employment in isolation. This strategy should also be designed to interface and align with existing and emerging national strategies addressing employment inclusion across disability, gender and race.
63. Beyond its practical function, a national age-inclusion strategy would send an important message about the value of older workers, establishing a model for businesses and industries to emulate. This is particularly important, given that age inclusion remains a conspicuous gap in most existing diversity and inclusion frameworks.
64. This recommendation also aligns with the discussion paper's emphasis on the role of government as a steward of service quality. The discussion paper frames government as an active steward of employment service quality, with responsibility for setting clear expectations and using contracting and incentive levers to shape provider and employer conduct.
65. An age-inclusion strategy sits squarely within this stewardship mandate. It reflects the recognition that employment services cannot deliver sustainable outcomes for older Australians without a parallel commitment to addressing the demand-side conditions that continue to see older workers excluded from meaningful employment outcomes.

Targeted pilot programs are needed to support older workers

66. Investing in targeted pilot programs would create pathways for older workers to develop emerging skills and connect with industries where their experience and contribution are most needed. Such pilots could provide valuable evidence in respect of Proof of Concept initiatives that demonstrate best practice in the recruitment and retention of older workers.
67. While numerous real-life approaches exist, the absence of independent and robust evaluation of these initiatives inhibits the capacity of governments and industry to identify what works and invest with confidence in bringing effective approaches to scale. Targeted pilot programs therefore represent an important opportunity to address this gap, provided they are accompanied by robust evaluation mechanisms from the outset.
68. For example, these pilots or initiatives could include providing training in emerging skills, such as artificial intelligence, and matching older workers to positions in industries with acute labour shortages. These pilots would serve a

dual purpose in improving sustainable employment outcomes for participants, while also generating learnings for industries facing workforce shortages on effective approaches to recruitment and retention of mature age workers.

Recommendation 6: The Department develop an age-inclusion strategy to drive age-inclusive employment practices in recruitment and retention of older workers.

Recommendation 7: The Department fund, as a priority, a range of pilots or proof of concept initiatives to support best practice in the recruitment and retention of older workers.

Endnotes

- ¹ See International Covenant on Economic, Social and Cultural, GA RES 2200A (XXI) (entered into force 3 January 1976) arts 6, 7 and 8(1)
- ² United Nations Convention on the Rights of Persons with Disabilities, opened for signature 30 March 2007, 2515 UNTS 3 (entered into force 3 May 2008) art 27
- ³ United Nations Convention on the Elimination of All Forms of Discrimination against Women, GA RES 34/180 (entered into force 3 September 1981) art 11
- ⁴ M Baird, M Hamilton and A Williams, *The Multigenerational Workforce: Managing Age and Gender at Work*, Palgrave Macmillan, Singapore, 2024.
- ⁵ J Coombes, C Lukaszuk, C Sherrington, L Keay, A Tiedmann, R Moore and R Ivers, '[First Nation Elders' perspectives on healthy ageing in NSW Australia](#)', *Australian and New Zealand Journal of Public Health*, 2018, 42(2): 361-364
- ⁶ Australian Bureau of Statistics (ABS), '[Job mobility](#)', ABS website, 2025.
- ⁷ Australian Institute of Health and Welfare (AIHW), '[People with Disability in Australia](#)', [Labour Force Participation](#), AIHW website, 2024.
- ⁸ Australian Institute of Health and Welfare (AIHW), '[People with Disability in Australia](#)', [Labour Force Participation](#), AIHW website, 2024.
- ⁹ Australian Bureau of Statistics (ABS), '[Job mobility](#)', ABS website, 2025.
- ¹⁰ M Baird, M Hamilton and A Williams, *The Multigenerational Workforce: Managing Age and Gender at Work*, Palgrave Macmillan, Singapore, 2024.
- ¹¹ Australian Bureau of Statistics (ABS), '[Disability, Ageing and Carers, Australia: Summary of Findings](#)', ABS website, 2022.
- ¹² L Duxbury and C Higgins, *Something's got to give: Balancing work, childcare and eldercare*, University of Toronto Press, 2017.
- ¹³ Australian Bureau of Statistics (ABS), '[Disability, Ageing and Carers, Australia: Summary of Findings](#)', ABS website, 2022.
- ¹⁴ M Baird, M Hamilton and A Williams, *The Multigenerational Workforce: Managing Age and Gender at Work*, Palgrave Macmillan, Singapore, 2024.
- ¹⁵ M Baird, M Hamilton and A Williams, *The Multigenerational Workforce: Managing Age and Gender at Work*, Palgrave Macmillan, Singapore, 2024.
- ¹⁶ See *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability* (Final Report, September 2023) vol 7(b) 382-5, 486, 507-10.

-
- ¹⁷ Jenny Crosbies and Erin Wilson, Centre for Social Impact, *Evaluation of the Australian Human Rights Commission 'IncludeAbility' Project 2020-2023* (Key findings, September 2023) 14 <<https://humanrights.gov.au/our-work/disability-rights/includeability-evaluation>> ('*IncludeAbility Evaluation 2020-2023*')
- ¹⁸ Ibid 13-15.
- ¹⁹ See Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, *Overview of responses to the Employment Issues Paper* (Report, March 2021) 6 <<https://disability.royalcommission.gov.au/system/files/2022-03/Overview%20of%20responses%20to%20the%20Employment%20Issues%20paper.pdf>>; See also *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability* (Final Report, September 2023) vol 7(b) 383, 469.
- ²⁰ Australian HR Institute (AHRI) and Australian Human Rights Commission (AHRC), *Older and Younger Workers: What Do Employers Think?*, 2025.
- ²¹ Australian Human Rights Commission (AHRC) and Diversity Council Australia (DCA), *'Age, assumptions and access at work: Employee experiences of age inclusion in the workplace'*, AHRC, 2026.
- ²² Australian Human Rights Commission (AHRC), *'Free and Equal: An Australian conversation on human rights'*, AHRC website, 2019.
- ²³ *Disability Discrimination Act 1992* (Cth) ss 5, 6, 15-21B.
- ²⁴ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (Final Report, September 2023) vol 7(b)
- ²⁵ Australian Human Rights Commission, *Willing to Work: National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability* (Final Report, May 2016)
- ²⁶ T Doan, C Labond, A Yazidjoglou, P Timmins, P Y and L Strazdins, *'Health and occupation: the limits to older adults' work hours'*, *Ageing & Society*, 2022, 44(4): 743-771.
- ²⁷ P Moen, E Kelly, E Fan, S Lee, D Almeida, E Kossek and O Buxton, *'Does a flexibility/ support organizational initiative improve high-tech employees' wellbeing? Evidence from the work, family, and health network'*, *American Sociological Review*, 81(1):134-164.
- ²⁸ J Parry, Z Young, S Bevan, M Veliziotis, Y Baruch, M Beigi, Z Bajorek, E Salter and C Tochia, *'Working from home under COVID-19 lockdown: Transitions and tensions'*, University of Southampton, 2021.

- ²⁹ R Cooper and M Baird, '[Bringing the “right to request” flexible working arrangements to life: from policies to practices](#)', *Employee Relations*, 2015, 37(5): 568-581.