Evaluation of the Australian Human Rights Commission 'IncludeAbility' Project 2020-2023

Key Findings

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Acknowledgement of Country

We respectfully acknowledge the Wurundjeri People of the Kulin Nation, who are the Traditional Owners of the land on which Centre for Social Impact Swinburne is located in Melbourne's east and outer-east, and pay our respect to their Elders past, present and emerging. We are honoured to recognise our connection to Wurundjeri Country, history, culture, and spirituality through these locations, and strive to ensure that we operate in a manner that respects and honours the Elders and Ancestors of these lands. We also respectfully acknowledge Swinburne's Aboriginal and Torres Strait Islander staff, students, alumni, partners, and visitors.

We also acknowledge and respect the Traditional Owners of lands across Australia, their Elders, Ancestors, cultures, and heritage, and recognise the continuing sovereignties of all Aboriginal and Torres Strait Islander Nations.

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Glossary

AHRC	Australian Human Rights Commission
CRPD	Convention on the Rights of Persons with Disabilities (United Nations)
DDA	Disability Discrimination Act
DES	Disability Employment Service
DSS	Department of Social Services
ILC	Information, Linkages and Capacity Building
NDIS	National Disability Insurance Scheme
RCVANEPD	Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability

The terms 'employing organisation' and 'employer' have been used throughout the report. The term 'employing organisation' recognises that the large companies involved in the IncludeAbility project are very diverse, however, the employment of human resources is a critical aspect of their company's operations.

EXECUTIVE SUMMARY

The IncludeAbility project was an initiative of the Australian Human Rights Commission (AHRC) that was delivered over three years from 2020 to 2023. The project was funded by the Paul Ramsey Foundation and the Department of Social Services via the Information, Linkages and Capacity Building grant program. The project had the following objectives:

- Increasing access to meaningful and sustainable jobs and careers for people with disability;

- Creating inclusive workplaces and building greater organisational capacity to address employment barriers for Australians living with disability; and

- Supporting the transition of young people with disability from school to employment.

The project delivered the following;

1. Establishment of an Employer Network:

2. Establishment of an Ambassador Advisory Group, who are people with lived experience and expertise of disability;

3. Development of employment resources to support employing organisations and people with disability, available at the project web portal;

4. Development of two Pilot Employment programs, one in Perth, W.A. and one in the Illawarra region of NSW.

Purpose of the Research

The Australian Human Rights Commission contracted the Centre for Social Impact (CSI) at Swinburne University of Technology to undertake an independent evaluation of the IncludeAbility Project. The evaluation aims to provide an overview of the IncludeAbility approach and document the extent to which the project achieved its objectives and the key findings of the project. The research methods were interviews of key stakeholders and secondary data from the AHRC and Pilot Employment Program partner organisations.

Key Findings

1. Barriers to employment for people with disability in large companies are complex and relate to the operating environment of each particular company. Therefore, those barriers must be made visible within each company and a bespoke approach to addressing them developed.

2. There is not a culture within large companies where employment candidates are routinely asked to provide information about reasonable adjustments or conditions for success within the recruitment and onboarding process. The AHRC potentially have an important role to play in changing this.

3. Addressing barriers within large companies requires engagement at all levels of the company from the Board and CEO level to the level of the workplace. Diversity and Inclusion Executives play a crucial role in connecting various levels of the organisation.

4. A culture of learning, a safe space and trusted partners supports large companies to implement programs that can deliver employment opportunities for people with disability at scale.

5. Undertaking a Pilot Employment Program supports companywide learning about barriers to employment for people with disability and the development of strategies to address those barriers, which can be applied at scale.

6. There is a range of providers who can support the inclusion of people with disability in workplaces, beyond Disability Employment Services (DES). Rather than focusing on a service type, the focus needs to shift to the types of supports required to create employment for people with disabilities in large companies, and the development of mechanisms to deliver those supports.

7. Companies require long term, sustained support to build their disability confidence and create employment opportunities for people with disability. Governments should work collaboratively with large companies to do this.

INTRODUCTION

Commenced in August 2020 and led by the Australian Human Rights Commission (AHRC), the IncludeAbility project aims to support large employing organisations to create meaningful employment opportunities for people with disability, and to support people with disability to seek or develop meaningful careers. The project was funded by the Paul Ramsey Foundation and the Department of Social Services via the Information, Linkages and Capacity Building grant program. This evaluation reviews the program during 2020-2023.

The project has the following objectives:

- Increasing access to meaningful and sustainable jobs and careers for people with disability;

- Creating inclusive workplaces and building greater organisational capacity to address employment barriers for Australians living with disability; and

- Supporting the transition of young people with disability from school to employment.

To achieve these objectives, IncludeAbility has undertaken activities in each of the four core project components:

1. Establishment of an Employer Network

2. Establishment of an Ambassador Advisory Group, who are people with lived experience and/or expertise of disability;

3. Development of employment resources to support employing organisations and people with disability, available at the project web portal;

4. Development of two Pilot Employment programs, one in Perth, W.A. and one in the Illawarra region of NSW.

These are described briefly below.

Employer Network

Via formal invitations and high-level CEO engagement with the then Disability Discrimination Commissioner (2019-2023), a set of 17 large employing organisations joined as inaugural members of the IncludeAbility Employer Network, affirming their commitment to the employment of people with disability (AHRC, 2021). The Network primarily engaged CEO's, Senior Executives and/or Diversity and Inclusion Leads in a range of activities including:

- Nine (9) Network meetings with a focus on relevant topics such as fostering discussion of disability in the workplace, developing a culture of accessible and inclusive communication, goal setting and success in employment targets, workplace adjustments and job customisation.

- CEO and senior leadership forums – two (2) in total,

- A '5+5 Listen and Learn' activity and webinar that provided five employees with disability with an opportunity to share their employment experiences with five senior leaders from their organisation directly,

- IncludeAbility Annual Health Checks (i.e., an access and inclusion assessment tool) of each Employer Network Member organisation that engaged representatives in considering the level of inclusion maturity (policies and practice) in their organisation.

Ambassador Advisory Group

The Ambassador Advisory Group comprised 17 Ambassadors who are people with lived experience and expertise of disability from diverse backgrounds. The group:

- Supported the design of resources (both ad hoc as well as via several formal workshops held to enable direct engagement in project design at key stages of the project)

- Advised on aspects of the IncludeAbility project such as the pilots

- Provided real life case studies for inclusion in relevant resources

- Led discussions and participated in panels at Employer Network events

- Presented at public events

- Supported the implementation of the pilots, e.g., introductory events, and hosting Communities of Practice among pilot employing organisations and intermediaries.

Employment resources and web portal

Described as an 'accessible and informative website with resources for employing organisations and people with disability' (AHRC, 2022a, p. 3), the website was launched in September 2021 and provides a range of information and resources.

Table 1: Overview of website resources

Resources for employing organisations	Resources for People with Disability
• Creating an Accessible Workplace; • Customising a Job for Persons with Disability; • Establishing a Disability Employee Network; • Creating Accessible and Inclusive Communications; • Hosting Accessible and Inclusive In-Person Meetings and Events; • Hosting Accessible and Inclusive Online Meetings and Events; • Creating an Accessible and Inclusive Induction; • Attracting People with Disability to Your Organisation; • Disability and Employment in Australia; • The Economic and Business Benefits of Employing People with Disability; • eLearn: Building a Culture of Accessibility and Inclusion (used by Employer Network members) • Access and Inclusion Health Check; • Disability Action Plan Guide • Guidelines for the targeted recruitment of people with disability • FAQ Videos (8 topics related to how employing organisations can create an accessible and inclusive workplace)	• Finding and Applying for a Job; • Preparing for an Interview; • Identifying as a Person with Disability in the Workplace; • Writing a Resume and Cover Letter; • Self-employment for People with Disability; • Identifying Accessible and Inclusive Employing organisations; • Your Rights as an Employee under the Disability Discrimination Act; • Disability and employment in Australia; • The Economic and Business Benefits of Employing People with Disability

Based on (AHRC, 2022a, p. 18; AHRC, 2023)

The website, and associated social media, attracted substantial engagement, with clusters of activity also focused on individual resources.

Pilot employment programs

The key objective of the Pilot Employment Program was to engage selected Employer Network members in a pilot program in which people with disability would be employed for an agreed minimum period, at award rates of pay. The Pilot Employment Program brings together employing organisations, specialised employment providers and people with disability through 'a focus on building place-based partnerships to achieve long-term job opportunities' (AHRC, 2022b, p.3). The pilot model involved the employing organisations offering a guaranteed number of new roles to people with disability; an intermediary (specialised disability employment support provider) providing the talent pool, screening and matching candidates, and providing support to both employees and employing organisations; and the AHRC providing the initial link between employing organisation and intermediary, as well as offering disability confidence training to the employing organisation intermediary, project management support, and advice regarding tailoring jobs and supports. Each pilot involved employment for a minimum of 12 weeks, with ongoing employment beyond the pilot period where possible, paid at Award wages. There is also a focus on developing mechanisms to further scale the initiative within the participating employing organisations.

Two Pilot Employment Programs were conducted; one in the Illawarra and South Coast region of (NSW) and the second in Perth, Western Australia. The Illawarra and South Coast Pilot involved six employing organisations, with a Disability Employment Service (DES) of a large disability service provider acting as the intermediary to provide and support a talent pool of potential employees with acquired disability. In Perth, a social enterprise/Australian Disability Enterprise (ADE) acted as the intermediary to support a large retailer to employ people with intellectual disability using their social enterprise/ADE employees and other service users as a talent pool. In the Illawarra and South Coast pilot, employing organisations provided 13 weeks of employment in the pilot period, at a minimum of 15 hours of week, whereas the Perth pilot provided 12 weeks of employment with a minimum of 8 hours per week.

Members of the Ambassador Advisory Group were involved in each of the pilots, including involvement in designing the pilots, providing training for employing organisations, and facilitating feedback and Community of Practice sessions.

Beyond the pilots, IncludeAbility has also worked with other employing organisations and intermediary organisations (for example, YouthWorX in the Northern Territory) to support the design and delivery of aspects of the pilots in other settings.

EVALUATION DESIGN

The IncludeAbility program utilised a Monitoring and Evaluation framework linked to funder requirements. The AHRC collected relevant data and reported to each funder against this framework periodically across the three years of the program. In addition, the Centre for Social Impact at Swinburne University of Technology (CSI) was contracted as the external evaluator, undertaking both developmental and summative evaluation activities focusing, on the nearly three-year period of IncludeAbility operations since August 2020.

The developmental evaluation activities incorporated two elements:

1. A mid-term review and update of the program logic, existing data and the utility of the existing data collection methods being used by the AHRC. The mid-term review involved collaborative 'sense making' of the program logic involving project and CSI staff, drawing on existing evidence about successful program design in disability employment programs.

2. Engagement of CSI researchers in the role of 'critical friend', that is a trusted advisor and staunch critic, especially in bringing evidence to inform the ongoing design of the pilots.

Both developmental and summative evaluation components drew on the data already being collected by the AHRC (i.e., secondary data), as well as additional primary data collected by CSI researchers involving interviews with Employer Network members, pilot employing organisations, Ambassadors, the Disability Discrimination Commissioner (2019-2023), pilot intermediaries, and pilot employees. Interviews focused on drawing out the perceived barriers to employment of people with disability, outcomes attained by IncludeAbility and the key ingredients for both the project's success, and successful employment outcomes in large organisations.

Summary of data used for this report

Over its operational period, the AHRC collected substantial data about the project. Some of this data was used to inform ongoing project design, while some speaks to the effectiveness of the program. This report draws from both primary interview data (collected by CSI) and a subset of secondary data (provided by the AHRC).

Table 2: Summary of interview informant type for data used in this report

Stakeholder type	Number of stakeholders
Pilot Employment Program – employing organisation representatives	9
Pilot Employment Program – employees with disability	4
Pilot Employment Program – intermediary organisation representatives	4
Employer Network members	7
Ambassadors	5
Disability Discrimination Commissioner (2019-2023)	1

Table 3: Summary of secondary data sources

Secondary Data Type	Number included in data analysis
Annual Employer Network member Health Checks	N=17 x 3 years
Pilot employing organisation pre pilot survey (W.A.)	N=12
Pilot employee post pilot survey and data (W.A.)	N=9
Pilot employee post pilot survey (Illawarra.)	N=7
eLearn module feedback survey	N=106
Employer Network survey, September 2022	N=11
Employer Network meeting attendance	9 records
AHRC periodic reports to Paul Ramsay Foundation	3
DSS ILC Activity Workplan	1

Qualitative data was thematically analysed to draw out key themes that relate to the project's objectives. Guiding questions included:

- What are the barriers to people with disability being employed within large businesses and organisations?

- How did the IncludeAbility project address those barriers?

- What changes or outcomes did IncludeAbility contribute to?

- What were the mechanisms or ingredients of the model that 'worked'?

- What is ongoing design logic for IncludeAbility, including areas for improvement?

In short, data has been analysed seeking insight into the contribution that the IncludeAbility project is making, and the key ingredients of its approach that underpin outcomes.

KEY FINDINGS

What are the barriers to employment that IncludeAbility can shift?

A range of barriers to the employment of people with disability in Australia have been identified by research literature and re-iterated recently in the *Final Report* of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with a Disability (RCVANEPD, 2023) as attitudinal barriers; physical and environmental barriers; organisational barriers; and structural barriers. Overwhelmingly, IncludeAbility participants identified that attitudinal and organisational barriers result in people with disabilities being excluded from workplaces. Organisational barriers have built up over time as part of 'business as usual' and have not been identified or critiqued as they have become an accepted part of the 'way things are done' in each organisation. In other instances, it was felt that some organisations paid only lip service to inclusion and would not be motivated to change without an imminent threat of changing legislative requirements.

Barrier #1: Attitudes about disability

Attitudes about employment of people with disability were seen to be complex and varied. Interviewees identified a general lack of awareness about disability and lack of contact with people with disability as drivers of negative attitudes about their employment potential. People with disability were perceived as being less capable, slower, and unable to undertake particular roles and tasks. One IncludeAbility Ambassador thought that negative attitudes stemmed from misconceptions:

> *I think it's actually just attitudes, you know, it's mainly just attitudes about what people can and can't do, what challenges they might face, judgments, misconceptions. (IncludeAbility Ambassador)*

An Employer Network member thought a lack of understanding was at the core of negative attitudes.

> *I think where the attitude issues come from is purely just a lack of education or understanding of some of the topics around accessible disability and accessibility. (Employer Network member)*

This results in uncertainty about how people with disabilities can be of value within an organisation. For example, hiring managers perceive that people with disabilities are less capable than they are.

> *My belief is the biggest barrier for a person with a disability is low expectations of the employer. That the employer has low expectations of a person with a disability and sees them as difficult, sees them as hard to employ, that they will cost more, that they will take longer to be trained, that they will need adjustments that the employer doesn't understand how to provide. (Pilot Employing organisation)*

> *I think when some people think about disability, they go straight to maybe more mental [cognitive disability] than anything else. Where I think a lot of people that we've hired, they've got anxiety or a few other bits and pieces. And I think that's been an eye opener for them as well. I know I bumped into one of the candidates in the [store] last week. She was brilliant. (Pilot Employing organisation)*

Likewise, a pre pilot survey of employer representatives expressed concerns about productivity and performance as likely barriers in the Pilot Employment Program context. This linked to fears that other employees would perceive the pilot employee *'as a burden on the able-bodied team'*, negatively affecting their productivity metrics.

Interviewees discussed the prevalent views in society more broadly where there remains an awkwardness about talking to people with disability and talking about disability. One Ambassador described it below:

> *What I've observed for people with intellectual disabilities, I see there's a lack of understanding or a fear of even talking or thinking about what they might do because people are quite inhibited around talking to people with intellectual disabilities. In terms of progressive degenerative disabilities, that's a particularly difficult space because it's awkward. People don't know whether they're going to be dealing with something that gets worse and whether they'll be able to handle it. And It's discouraging and I think frightening for people. (IncludeAbility Ambassador)*

These attitudes of discomfort about disability extend into the workplace.

> *I think the fear of getting it wrong and 'cancel culture'. I think it's really attitudinal. Often the reluctance to hire people with disability, in particular intellectual disability, I think, comes from an attitude of low expectations wrapped around that if we get it wrong, we're going to be subject to ridicule and that our company will receive bad press because we didn't get it right. Rather than being open to speed bumps and problems and challenges and working together to adjust them. (IncludeAbility Ambassador)*

Barrier #2: Recruitment and onboarding practices and processes

Data from a range of sources identified that recruitment and onboarding practices are a significant barrier to employment for people with disabilities, often excluding people inadvertently.

> *Some of the issues are that the job descriptions and the recruitment processes and interview processes themselves aren't always very inclusive. (Employer Network member)*

In the main, despite being large employing organisations, most Employer Network members did not have a Disability Employment Strategy in their policy suite. In annual Health Check data (2021 and 2022), more than 50% of Employer Network members did not actively encourage people with disability to apply for advertised roles. Similarly in 2021 (i.e., near the commencement of IncludeAbility), only four of seventeen Employer Network members noted that they targeted particular vacancies to people with disability. Where organisations don't explicitly encourage people with disabilities to apply, it may deter applicants with disability as they may believe that the organisation does not want to hire people with disabilities or will not provide necessary accommodations.

Annual 'Health Check' data also showed that more than 50% of Employer Network members did not mention the organisation's reasonable adjustment policy in job advertisements. This echoes evidence from the Disability Royal Commission where only four of twelve private sector employing organisations did so (RCVANEPD, 2023). In interviews, there was a recognition that not providing a seamless mechanism for all candidates to tell the organisation about the accommodations they need to engage in the recruitment process, meant that people were more reluctant to volunteer that information due to fear of discrimination. This will be discussed further below (Barrier #4).

While specific recruitment practices acted as barriers, one Employer Network member recognised that his organisation had recruitment practices that are set up narrowly in order to attract 'top tier talent'. Given the disadvantage many people with disability face throughout their life, he now recognised that they were less likely to be in the spaces that his company recruit from, such as top universities.

> *There are talent pools that we naturally recruit from for a company like [organisation], where we recruit top talent at top tier universities and at top tier graduate schools. It's traditionally been a very selective approach and that has meant that there's a lot of people that could be very successful at [organisation],*

> *who maybe aren't going to those schools and aren't in those talent pools.*
> *(Employer Network member)*

Several Employer Network members similarly identified that their recruitment practices were designed around very narrow assumptions of the best candidates, and often involved online screening activities.

> *The more technology becomes involved, there's less of that human contact. There has also been an increase in using task-based pre-screening for graduate and other professional roles. (Pilot Employing organisation)*

> *[Task based pre-screening] I think has been implemented to try and funnel and filter out down to a particular very narrow set of characteristics of people and they do it and it's quite rational because you have to - you have a lot of applicants and so you've got to find a way to triage that very quickly and efficiently.*
> *(Employer Network member)*

This 'increasing systematisation of recruitment' was raised as a concern by the Disability Royal Commission (2023, p. 388).

Among Employer Network members, there was recognition that recruitment practices include 'criteria' that are unnecessary, that is they don't relate to the role on offer. People with disabilities may be less able to meet the criteria, for example requiring the 'ability to work in a remote location' when the work can be done virtually from a capital city.

> *Certainly, the way we design roles for a start, and the way we plan our advertising process, we know even through our short-listing process and the types of criteria we apply - we know that too many of our roles still have mandatory medical requirements that aren't actually core to the roles we have. (Employer Network member)*

This highlights the need to continually review the inherent requirements of positions, particularly as workplace circumstances change. Inaccurate inherent requirements act as 'artificial barriers' to the employment of people with disability (Ms Donnelly, CPSU, quoted in RCVANEPD, 2023, p. 390).

Some recruitment processes create anxiety for candidates who experience mental health issues or who have had less opportunity to develop their professional communication skills. One pilot employee stated that without IncludeAbility he *'wouldn't have felt confident to go into [organisation] as an applicant'* because he had already applied 3 or 4 times and had never heard anything back. For him, without IncludeAbility he wouldn't be working at the organisation. He strongly felt that he got the job solely due to the project. This resonates with Health Check

data that identifies that few Employer Network members offered a 'guaranteed' interview for applicants with disability who met the minimum requirements, with only three of seventeen members doing so in 2021 (rising to five in 2022).

Once selected for interview, interview processes also acted as a barrier to employment. One organisation identified that group interviews and formal interviews, especially for people with particular disabilities, don't: bring out the best for some people with disability; focus on their strengths; or enable them to show what they can do. In addition, while many Employer Network members identified that their company did engage interviewers who had undertaken disability awareness training, this was not stable over time and more than one third of companies still did not ensure this.

Several Employer Network members described their onboarding practices as overly complex, requiring people to complete multiple processes, often online. Onboarding often requires training that is not fully accessible.

> There's a lot of training that you need to do from a health and safety point of view, from our customer experience, from a mostly safety conscious or legislative requirements, which can be quite difficult for some of our teams. There's been a team member, we've been trying to recruit since March, part of this project - still hasn't done the training. (Pilot Employing organisation)

One pilot employee and her father (who supported her to complete the onboarding training) described what was involved in undertaking the compulsory online training modules required before commencing in her new role:

> They said it was going to take three hours, probably took more like 10. And we had to do it within a set period. And they very generously gave us three hours pay to do it, which is fine. But it took us quite a long time, which we had to do. We were happy to do it. But yeah. (Pilot Employee)

In such contexts, standard onboarding activities act as a barrier due to the additional burden placed on people with disability to complete them without the provision of suitable accommodations, and this, coupled with the extra burden on the employing organisation, results in employment of people with disability becoming too difficult to implement. There is a need to support the employing organisation to focus on the inherent features and requirements of that organisation's recruitment practices, and how these can be adjusted.

The government-funded systems that support people with disability into employment were not utilised by most Employer Network members. Around half of members used a Disability Employment Service (DES), with far fewer (only two in 2021) utilising the Employment Assistance

Fund that provides expert advice and funding to support reasonable accommodations. Some interviewees felt that government employment services did not meet the needs of large employing organisations, partly due to the complexity of the system, as one pilot employing organisation described:

> And the [employment service] providers were only there for that person. They weren't there to try and make it work as a company if that makes sense. It would just be 'this is the task that we do and that's what we're doing, and I just need to be here to support this person'. Where [the IncludeAbility intermediary] were just trying to go 'right - what do you know, where can we go, what can you do, what tasks are there? I understand there's a business to run - so what can we do from this aspect?'. There's a more collaborative approach, where previously it would only be they are just there for that person. (Pilot Employing organisation)

> How do you scale it up? I think that goes back to that point about [the missing piece] ... there's a lot of providers out there, a lot of different ways and so much complexity in it and it actually just needs somebody there for them [organisations], with them. But there seemed to be barriers put in place by government, to be honest. (Employer Network member)

Employment Network members did not significantly utilise other mechanisms to generate an embedded talent pipeline, such as work experience programs or connecting to activities such as those provided within School Leaver Employment Supports (SLES), funded by the National Disability Insurance Scheme (NDIS). Only one Employer Network member utilised SLES (in 2021 or 2022), while less than half offered work experience to people with disability as a job readiness pathway. Some employers expressed discomfit with unpaid work experience roles for people with disability. Some organisations were participating in targeted internship activities, particularly through the Australian Network on Disability, or ran paid graduate programs.

Across this diverse array of barriers, Employer Network members also identified that, despite supportive recruitment and employment policies, implementation of these and recruitment practices more generally, remained highly localised resulting in patchy compliance with inclusion intentions. Overall, the lack of use of explicit and targeted strategies to support the successful recruitment of people with disability remains a barrier to employment.

Barrier #3: Embedded organisational structures, processes, and reporting

All the Employer Network members interviewed identified complex internal processes and reporting systems as a barrier to employment for people with disability.

One example is reporting structures related to sales and productivity. When asked what he thought the key barriers to employment were for people with disability, one manager from a pilot employing organisation described the way productivity is measured as the key barrier:

> *Productivity metrics. So, the company runs off productivity metrics, whether they're historical or measured by industrial specialists or whatever it is: they presume that everyone works at a set pace. And there's very little room to move. [Recently] we started to measure how many hours are used to take the sales on the day and now we measure it by hour, by day, by department and by percentage. (Pilot Employing organisation)*

Managers' reticence to bring in team members who are perceived to be slower or less productive can be interpreted within this context, where organisational metrics drive against diversity and flexibility. As mentioned above, this was raised as a key barrier in the Perth pre pilot employing organisation survey by several employer representatives.

In addition, staff rosters are complex for organisations operating long hours across seven days a week. Staff members with restrictions, such as those unable to operate cash registers, need to be rostered in such a way that there are enough tasks available for them to undertake during the rostered shift, as described by one store manager:

> *I did find that was quite hard for people with disability to try and roster. 'I can do that task', but it's only an hour or an hour and a half task and I need a three-to-five-hour shift. Well, what are you then going to do? (Pilot Employing organisation)*

It also means that there are limitations on how many employees with restrictions can be employed by the store in total. Rostering was also an anticipated barrier on the Perth pre pilot employing organisation survey.

A number of Employer Network members reported that their organisation had set ways of operating that are not flexible. This results in individual managers having little flexibility to customise roles for people who need it, as outlined by one pilot employing organisation:

> *We've become so measured with everything that a task has to be done at a certain time. (Pilot Employing organisation)*

One Employer Network member identified inflexible thinking in terms of how roles could be performed and from what locations, and how technology has enabled that flexibility, but this has not been fully realised.

> *I've often said that if we can get this right, technology is only helping us to become a more inclusive industry. So many of the control room roles, which used*

> *to be based at site, can now be based in capital cities where mines are operated*
> *remotely: driverless trains, driverless trucks. (Employer Network member)*

In other contexts, however, technology remains a barrier, as described by one Employer Network member:

> *Even beyond policy - we actually have some systems – some of our systems are*
> *so old that they're still the old green screens that screen readers can't use, for*
> *example.*
> *So, you know, we've got legacy tech issues that are barriers to progression.*
> *(Employer Network member)*

These kinds of issues often require new decision making by senior leaders in the organisation. However, Employer Network member data shows that in more than 50% of companies these roles do not contain an equal representation of people with disability. This was also an issue identified by the Royal Commission (2023). Similarly, only two Employer Network members felt that employees with disability enjoyed career progression at a rate similar to employees without disability. This data highlights embedded organisational issues affecting retention, promotion, and leadership opportunities, which in turn potentially affect the way other organisational processes continue to be designed.

Barrier #4: Culture of not disclosing/asking about accommodations

Prior to their involvement in IncludeAbility, only one of the Employer Network members interviewed had a culture of routinely asking applicants or employees about the accommodations required to enable their participation in the recruitment process or onboarding processes. This resulted in potentially suitable employees failing to proceed successfully through the recruitment process, possibly because accommodations were not provided. Highly formal recruitment practices tend to put all parties on edge, and employing organisations are required to manage risk during the hiring and onboarding process for all of their candidates and employees. This has led to a culture where discussion about disability is avoided, and people with disability are not asked about accommodations. Recruiters and line managers therefore remain unaware that accommodations are required and lack an understanding of the common accommodations that can address barriers to the recruitment process and employment. As discussed above, this culture of 'not asking' results in people with disability not applying for roles or not identifying their need for accommodations early in the process, which results in a negative outcome.

Organisations and people with disabilities themselves reported unease about disclosing or discussing disability as well as asking for or asking about accommodations. People with

disabilities were concerned about how the information would be used by an employing organisation. For example, not being offered a role because the accommodations were perceived to be too expensive or complex, as opposed to having confidence that the information would be used to support the provision of suitable accommodations.

> *[Q: Do you think knowing how to put accommodations in place is something that's a barrier for people with disabilities in terms of employment? Do you think companies know how to do that?]*
>
> *Absolutely I think it is a barrier, because sometimes it comes down to asking and people are afraid to ask and you know, part of the work that I do … is that if you're OK with asking someone what their coffee order is or what their pronouns are, you should be fully ok to ask … 'how can we assist you in terms of your disability and the accommodations you might need to work?' And it's a reluctant cause. It's like, we can't say that, but you can, because you're not being a sticky beak for the gossip. You're being a sticky beak for the purpose of saying we would like to help you and make this work for both parties and how we do that is about having open conversations and building confidence that people can divulge their disability without discrimination but divulge their disability and their access needs from the perspective that it's going to assist them in their employment. (IncludeAbility Ambassador)*

One employing organisation raised a concern about whether collecting additional information about disability or necessary accommodations leaves businesses exposed to disability discrimination claims if the applicant is unsuccessful. One example related to additional 'profiles' that were created for candidates coming into the organisation via the IncludeAbility project.

> *[The Diversity and Inclusion Manager] said 'I get what you want, but you've got to also take into account, if we're doing that and people are just coming through a normal process of hiring, that could be construed if that person's not hired, and they provided all this information [i.e., an individual 'profile'].... [as discrimination]'. And then he said, 'well, why should they have to provide that information and 'normal' people don't have to say what their strengths and weaknesses and opportunities and, you know, hobbies are?' And so, it's how we bring those questions out without it feeling like 'I'm not going to answer that cause I won't get the job'. (Pilot Employing organisation).*

This quote speaks to the tension in utilising individual 'profiles' of potential employees with disability which are designed to help 'see the person not the disability' and document strengths,

interests and areas of weakness or dislike in order to humanise the person and provide information to assist making a good job/role match. While these were seen as potentially a very helpful tool, only requesting these of applicants with disability raises complex issues of whether this is a helpful accommodation or fodder for discrimination.

The annual Health Check data consistently raised concerns about how to create a culture that fosters disclosure of disability, without breaching anonymity and privacy. Consistent with the findings of the Royal Commission (2023), Employer Network members identified the lack of data to evidence the level of employment of people with disability in their organisations, given the significant mismatch between disclosure of disability in formal personnel data and anonymous 'employee voice' data, where disability disclosure was significantly higher. Given the important role the AHRC has in reducing discrimination and promoting the use of accommodations to improve employment opportunities, the IncludeAbility project is well placed to support large businesses to develop confidence in this area.

Barrier #5: Finding the right person for the job

Organisations committed to the concept of employing people with disability can't always easily locate what many refer to as a 'talent pipeline' or 'talent pool' of people with disabilities seeking employment. One Employer Network member had sought out people with disability with a specific skillset:

> It's been a bit harder to find [existing disability talent pools]. I did a bit of a scan late last year/early this year to try and work out was there a leadership group or somewhere a community that already existed and it wasn't obvious. I'd love to sponsor one, honestly, if that was the conclusion that we came to - it doesn't exist - maybe we can create it. (Employer Network member)

A number of Employer Network members had had negative experiences with government funded Disability Employment Services (DES), particularly in relation to them failing to provide the on the ground support that was promised. Other criticisms relate to DES providers failing to ensure a good job match, and an over-emphasis on paying wage subsidies which don't necessarily help to onboard the person successfully.

> One of my biggest frustrations is that a lot of people with disabilities have a lot of support available, and mentors and things like that. But trying to get people into the store, working with them shoulder to shoulder and spending that time. Just it seemed to be quite difficult. In my previous experience before this IncludeAbility [pilot], you'd have a team coming in from various different companies [i.e., DES] that are trying to get people with disabilities [into work] and they say, 'look, we've

> *got all of this money, you know, we've got $12,000 that the company will get'.*
> *Well, I don't get it as a store. (Pilot Employing organisation)*

There was recognition that recruiting and onboarding people with disability took extra time and there was added complexity in matching people who have work restrictions into the right roles. One pilot employing organisation described it below:

> *What I've struggled with in the IncludeAbility [pilot] is understanding what the*
> *disability is and what the strengths were and what the opportunities were for*
> *those team members. And it's quite individual and that takes a lot of discussion*
> *and talking that store managers are potentially able to do and because we deal*
> *with people that's our job. However, I've got 116 team members. For me it needs*
> *an investment and time. (Pilot Employing organisation)*

Such comments highlight the time and resource impost facing employing organisations seeking to connect with appropriate talent pools and employ people with disability.

What change did IncludeAbility drive?

The IncludeAbility project sought to build organisational capability of large employing organisations to underpin the increased employment of people with disability in these organisations. Analysis of evaluation data identified five key changes that resulted from the IncludeAbility project.

Change #1: Engagement in improving employment opportunities for people with disability

IncludeAbility engaged key senior personnel from seventeen large organisations in an Employer Network focused on increasing employment of people with disability within those organisations. Several Employer Network members spoke about IncludeAbility being a catalyst for change and the start of an ongoing process, one in which they would require support as they moved through different stages of what they considered a 'journey'. They identified that IncludeAbility provided the support they needed to 'drive the agenda' internally.

> *I think when you think about all of the organisations that are on the [Employer]*
> *Network, you know we have quite a big reach in terms of providing employment.*
> *So, I think that is absolutely the way to do it. I think even the fact that the*
> *employees on the Network can learn from each other and some of the*
> *discussions, it only adds value to how we're doing things and it's created*
> *conversations after the Network as well where we will occasionally speak on*

where we're at in terms of employment and accessibility too. (Pilot Employing
organisation)

Employer Network members described gaining knowledge, increased awareness, and increased confidence, which they hoped would help ignite their organisation's commitment to employing people with a disability and make it a reality. One Employer Network member, who referred to herself as an 'inclusion enthusiast' stated that '*IncludeAbility has been a supercharge for us on this journey*'.

While predominately attended by Diversity and Inclusion Leads, the Employer Network also enabled engagement at the level of the CEO and executive, which is a critical factor in successful initiatives.

> *The greatest point of leverage is actually influencing the senior executives. Dare I*
> *say it's a narrower group to target, but disproportionately valuable because of the*
> *roles they play in the organisations. (Employer Network member)*

The hosting of the IncludeAbility project within a human rights organisation, one that has a formal role in promoting the right to employment for people with disability, helped to shift the discussion towards the right to employment, the barriers that exist for people with disability and the mechanisms to make employment at scale a reality within large organisations. It also provided a new opportunity for the AHRC to use its resources to build a positive movement for change, rather than addressing discrimination complaints as they arise.

Employer Network member organisations engaged in a range of activities including panel events, annual 'Health Checks', meetings, and forums. Interviewees reported that involvement in the Employer Network had led to personal growth and improved their understanding of the experience of people with disabilities in the labour market, including the barriers they face. This enabled them to identify structural barriers that exist within their own organisation that must be addressed in order to create an inclusive workplace culture. Similarly, Employer Network survey data highlighted the role of the Ambassadors in contributing to the organisations' ability to address workplace barriers and create inclusive workplaces, with 70% of respondents noting each of these outcomes.

The Employer Health Check process provided Employer Network members with a structured approach to identify policies and practices that enable an inclusive workplace culture. The annual check-in also enabled organisations to track their progress and plan next steps as well as providing helpful strategies to implement.

> *The Health Check is very valuable, because it comes down to what I was saying earlier, that a lot of people have no idea what they can do, what best practice is. (Employer Network member)*

IncludeAbility provided formal training to Employer Network members and pilot sites, focussing on disability awareness and disability confidence. Participants reported that the training was highly useful in helping them to understand how they can address key structural barriers, such as inaccessible recruitment and onboarding practices and, in particular, to establish processes to ensure that all applicants and employees are supported to have the workplace accommodations they need in order to be successful in the workplace. For example, one pilot employing organisation made a significant change to their recruitment process through knowledge gained from being engaged in the IncludeAbility project.

> *We have introduced engagement questions around workplace adjustments for the broader workforce (Pilot Employing organisation)*

Other pilot employing organisations were able to demonstrate inclusive practices that were called out and valued by pilot employees. In post pilot surveys, pilot employees commented on the characteristics of supports and adjustments that 'worked':

> *Supervisor is supportive and created a space to be able to talk about anything. (Pilot employee- survey)*

> *Employer's understanding of my disabilities. (Pilot employee- survey)*

> *Employer is really understanding and the whole team is flexible. (Pilot employee- survey)*

> *Employer understood my limits and always is open to talk to. (Pilot employee- survey)*

> *Employer knowing my strengths and supporting me to do well. (Pilot employee- survey)*

While employees involved in the pilots experienced improved employment practices, Employer Network members also attested to their own change. A survey of the Employer Network in September 2022, by AHRC, was completed by 11 members and found that 9 of the 11 felt that their organisation's capability to identify and create meaningful employment opportunities for people with disability had increased (though with one member strongly disagreeing).

Across the life of the project, it is important to note that not all Employer Network members engaged equally, with a small number not evidencing substantial commitment to either engagement or action, and others finding that the Network and events did not match their

organisational needs, sometimes because their level of inclusion maturity was already well advanced. Despite their involvement in IncludeAbility, some Network members continued to perform poorly in many areas of the annual Health Check, such as not having a mechanism for disability awareness or confidence building training within the workplace. For some, this resulted from a very low starting base, with Network members commenting that the IncludeAbility process had been a catalyst for change (albeit slow), with the '*sessions and topics [found] to be extremely valuable in sharing timely topics and collaborating with others on impactful solutions*' (Employer Network member- Health Check 2023).

Change #2: Deepened understanding of strategies for success

Involvement in the IncludeAbility project enabled 'already engaged' organisations and individuals to deepen their understanding of what is required to employ people with disability at scale. Three Employer Network members were involved in an employment pilot, whereby they made a commitment to employ people with disabilities on full award wages for a minimum period of 12 weeks. This commitment enabled pilot organisations to shift their thinking from 'should I' to 'how do I' employ people with disability in the organisation. Employing organisations reported that engagement in the pilot enabled a deeper level of learning for their organisation as they took their learnings from theoretical to practice, learning and building specific strategies for success that worked for their particular organisation.

Targeting talent pipelines

Employer Network members spoke about developing a deeper understanding of the strategies their organisation would need to pursue to create meaningful employment opportunities for people with disability. There was an increased awareness of the need to broaden the way potential candidates came to the organisation, by broadening talent pipelines. One Employer Network member felt that, for his organisation, the adoption of an explicit strategy targeting recruitment of people with disability and the seeking out of talent pools was necessary:

> *I think the most important thing I learnt was the need to have an explicit strategy for recruiting people with disability. There's an element of the normal recruiting process - the more inclusive you can make that process, the more likely you are to maybe recruit people with disability. But I also think there's - well, I've seen from some of the other employers, the more mature, more advanced employers, is an actual specific recruitment strategy looking, for example, for talent pools where you might find people that would be good candidates... What we have found with some of our other diversity and inclusion cohorts - trying to attract more women or trying to attract more LGBTQI diversity, is actually to go to try to*

find ways - find those communities where those people are and in large
organisations where you've got employee resource groups, you know that you
obviously have a sense of some gathering and critical mass. I think what's been
quite successful is actually trying to find groups where those people are and
connect to them. So, we have got involved in things like Chief Executive Women
and Male Champions of Change, which is great. We also try to look for networks
where there are, say, women in technology and sponsor events or sponsor
programmes that support those things. (Employer Network member)

One Employer Network member had noted the disparity that resulted in employment services not being available to young people with disability until they turned 17, and identified that the employing organisation therefore needed to address this if they were seeking to access this talent pool.

People with disability can't access employment services until they're 17, so
there's already a three-year disparity between people being able to commence
employment. So, I think again, this is a very [organisation] focus, more so than we
thought [because we employ young people]. (Employer Network member)

Other organisations became more intentional in their adoption and use of strategies like offering work experience for people with disability. Annual Health Check data showed that the number of organisations using work experience as a mechanism to support job readiness of people with disability rose from five in 2021 to eight in 2022 (though it should be noted that not all organisations retained an ongoing process).

Recruitment and onboarding policy and practice

Several businesses reported that they implemented new recruitment and onboarding practices, and this was critical to increasing the proportion of staff with disability they employed. Involvement in IncludeAbility had enabled them to identify recruitment and onboarding as a structural barrier, and they had been supported with information, advice, and strategies to address this barrier. The annual Health Check data showed a steady increase in organisations offering targeted vacancies, from four organisations doing so in 2021 to ten in 2022 and 12 in 2023. In addition, an Employer Network member outlined a small program the organisation had commenced since joining IncludeAbility, which had involved the targeted recruitment of people with disabilities within a specific division of their organisation.

Communicating more clearly with potential candidates about the organisation's Disability Employment Strategy was considered to be a critical step in attracting a bigger pool of candidates with disability. For example, by adding 'people with disability are encouraged to

apply' to all job advertisements and asking all candidates to provide information about accommodations required to engage in the recruitment process.

> *The recruitment - make it clear up front to encourage people with disability to apply. Communicate or talk about their adjustments or accommodations they might need in order to be able to do the job. (Employer Network member)*

A pilot employing organisation had implemented a number of changes to their recruitment process, including asking each candidate to outline any accommodations required to engage in the recruitment process.

> *We don't need to know if they have a disability at the beginning of their application process. We only ask if they require workplace adjustments either for the recruitment process or into employment. We had huge uplift in terms of people disclosing - unexpected to be honest - when we first introduced that mechanism. So, I think that's been a really big part - the inclusive language component and that was actually something we did - I think it was maybe the first or second IncludeAbility [meeting]- for that. We spoke about language through the recruitment process which we leveraged a lot of that into our own application forms. (Pilot Employing Organisation)*

Other changes in recruitment processes and practices included replacing formal interviews with 'store walk throughs', use of meet and greets, and round tables for interview meetings to help candidates feel more comfortable.

One Employer Network member had become aware that essential criteria in the organisation's job descriptions was inaccurate, containing criteria that was not inherent to undertaking the tasks. For her, reviewing job descriptions across the organisation to remove criteria that are not an inherent requirement of the job is a critical first step in attracting a higher number of candidates with disability.

Several Employer Network members noted that COVID had enabled organisations to think more flexibly about how roles can be undertaken within their organisations. These learnings can potentially be harnessed and transferred in order to build flexibility into roles, so that people with disability can undertake them.

Changes in disability confidence

The deepened understanding of 'how to' enact increased employment of people with disability, was related to changes in disability confidence amongst IncludeAbility members. The IncludeAbility pilots enabled disability awareness and confidence training to be provided across the pilot employing organisations, which was facilitated by AHRC staff. The training was provided

to a broad range of employees at all levels of the organisation. Several interviewees felt that access to such high-quality training for key leadership staff across their organisation was critical to shifting attitudes about employing people with disability and provided key leadership staff with improved understanding about how to facilitate employment within their local workplace.

> *To our store leadership teams, I think, that's where we've seen the biggest cut-through … we really set the pilot up for success based on those couple of days of training that we did in the beginning. (Pilot Employing organisation)*

One pilot employing organisation felt that the training received and, in particular, discussing scenarios, was a critical mechanism to deepen understanding.

> *It was actually talking through scenarios. Because we are very different people, store managers, you know. What does that practically look like? Doing that and having those conversations back and forth or open conversations that we have, the team that did the training, are really good. (Pilot Employing organisation)*

Human Resources and Talent Acquisition Partners reported that they had gained knowledge about supporting talent pipelines, inclusive recruitment, and onboarding. For hiring managers there was an increase in knowledge about identifying candidates' capabilities and strengths, as well as new support to onboard new team members.

There was also an aspect of disability confidence that was related to conversations held about the use of language, in particular the use of language around accommodations and strengths, as discussed earlier.

One Employer Network member, who stated that her organisation was at the early stages of building more inclusive workplaces, felt that disability confidence would naturally grow as the organisation took concrete steps to address structural barriers identified:

> *I think disability confidence in my mind is still quite low. I think the work that we do through removing of structural barriers, the support for diverse people that are employed, and the employee resource groups is going to start to raise that profile, but that's work that's happening over the next 12 months. But it's all work that's been sparked by IncludeAbility, but I think I would feel dishonest to say to you that our disability confidence scores have significantly increased yet. (Employer Network member)*

This demonstrates that disability confidence builds over time as processes and practices shift and become embedded within organisations. There is therefore a need to continue to support organisations at the pace in which they move through the process of change.

Change #3: Increased opportunities for paid employment for people with disability

The IncludeAbility project supported large employing organisations to increase opportunities for paid employment in a range of ways. As discussed above, Employer Network members described how involvement in the IncludeAbility project had supported them to employ people with disability within their organisations. However, it was within the two pilot sites that opportunities for paid employment have been realised, both within a three-month pilot period and beyond.

Pilot site 1: Perth

As described earlier, pilot site 1 engaged a large national retailer across metropolitan Perth to employ people with intellectual disability within their stores. A local disability service provider (which has an Australian Disability Enterprise with retail outlets) was engaged as the 'intermediary' by the AHRC, to provide the talent pool to the organisation and to provide the supports required to recruit and onboard employees.

The employing organisation employs approximately 200,000 staff nationally in approximately 1086 stores. For the purposes of the pilot, only one division of the company was engaged. Engagement in the pilot required that division to employ a target of 15 staff across multiple stores for a minimum of 8 hours per week at Award wages and for a minimum of 12 weeks. There was also an expectation that the employment would be ongoing.

Fifteen (15) people with intellectual disability were employed during the pilot and twelve (12) have ongoing employment with the company.

> It's looking as though we'll have [most pilot employees] continue on with [organisation]. I can well and truly say that that's above our normal retention rate for any other person, and I could confidently say that that's above the rate of people who would have got through our existing talent pipeline if they were to say that they were a person with a disability from the start, if they didn't have an advocate like a good DES provider, or an [intermediary] shepherding them through the process. (Pilot Employing organisation).

Beyond employment outcomes, post-pilot data provided by six pilot employees reported an increase in skills, independence, social and professional networks.

Pilot site 2: Illawarra and South Coast region of NSW

Pilot site 2 engaged with a set of employing organisations in the Illawarra and South Coast region of NSW. Pilot 2 targeted employment of people with acquired disability, included those seeking to return to work or gain employment for the first time. Initial interest was generated

among two large employing organisations who were Employer Network members and 23 local employing organisations who engaged with the pilot following the launch that was held in Wollongong in November 2022. The AHRC engaged a disability service provider (that includes an Australian Disability Enterprise and a Disability Employment Service) as the 'intermediary' to provide the talent pool to the organisations and to provide the supports required to recruit and onboard employees.

Fifteen (15) people with disability were employed within the pilot across six (6) employing organisations. Though all had acquired disability, not all had previous experience of employment. The pilot included one major retailer, employing seven (7) people within the pilot, and five other employing organisations, employing eight (8) people with disability within the pilot period. Based on mutual agreement, not all employees were required to work the minimum of 15 hours per week. Overall, thirteen (13) people with disability have ongoing employment: all seven (7) pilot employees retained continuing employment at the end of the pilot with the major retailer and six (6) retained employment with the other employees.

One pilot organisation representative reported that each of the stores (of the major retailer) involved had employed more than the minimum number required for the pilot.

> *[We've hired] more people than we had committed to as part of the pilot. So, that in itself says to me that yes, the managers are much more confident in employing people with disability. (Pilot Employing organisation]*

All pilot employees in the major retailer (the only employing organisation where post pilot data is available) reported improvements in their confidence, skills and independence alongside a sense of self-worth and purpose. In their post pilot survey, pilot employees highlighted that their outcomes as:

> *Proved that I can work in open employment. (Pilot employee-survey)*

> *Proud to show my kids anything is possible. (Pilot employee-survey)*

During interview, one person with disability engaged in the pilots described the opportunity as *'life changing'*. Another stated *'I'm just so grateful. I don't know why they picked me' (Pilot Employee).*

Pilot employing organisation Diversity and Inclusion Leads outlined their goal to replicate the employment outcomes across their organisation. They were in the process of determining how best to do that within the context of the learnings from the pilot phase.

Change #4: Opened access to new supports and talent pipelines for employing organisations - the role of intermediaries

Access to talent pipelines was identified as a key barrier to employment for people with disability. As discussed above in the description of the pilots, IncludeAbility addressed this barrier by connecting large employing organisations to disability service providers (intermediaries). These organisations committed to deliver the supports the employing organisations identified were required to onboard significant numbers of people with disability, such as providing suitable candidates, being present onsite, having regular meetings to discuss progress, and taking a holistic view by supporting the employing organisation rather than just the person with disability.

> So that first 12 weeks [of employment] is really crucial to get that high support, high training, somebody with them [new recruit] saying 'no, you need to do this in this time', and we don't always have that time, the managers don't have that time. (Pilot Employing organisation)

> I think having that support as a store manager. I can do it, but it gives you that time back. I think that's probably something that IncludeAbility helped with because we had lots of discussions and we've had, you know, a lot of support. (Pilot Employing organisation)

In the case of the Perth pilot, the intermediary was a disability organisation primarily providing supported employment through an Australian Disability Enterprise. The pilot enabled employment for their clients, who had training and experience in the ADE retail setting, with a major retail company. The employing organisation particularly appreciated the deep knowledge the intermediary had about the new employee with disability, including their 'conditions for success'. This enabled problems to be addressed quickly and the implementation of strategies to address productivity issues for example.

The shift from supported employment in an Australian Disability Enterprise to working in a national retail store had opened up new opportunities for one young person involved in the pilot. Having just had her ongoing employment confirmed, she was looking forward to increasing her hours and pay and learning new skills. From the employing organisation's perspective, the new employee's previous experience in a supported retail environment had been helpful in preparing her for work.

One pilot organisation representative reported that the organisation now saw the disability provider (intermediary) as a trusted recruitment partner moving forward. As a result, further employment opportunities have been opened up for others beyond the pilot.

How did IncludeAbility drive change?

A main focus of the developmental and summative evaluation was the identification of the key ingredients in the IncludeAbility design and approach that contributed to change outcomes. These go beyond the specific program activities (such as the program's four components) to the underpinning organisational and process elements supporting their implementation.

Ingredient #1: Branded change led by the AHRC

The IncludeAbility project provided leadership and branding that enabled individuals and organisations to 'join onto' something rather than creating their own initiative. The project being led by the AHRC, and the hands-on involvement of the Disability Discrimination Commissioner strengthened the initiative in several ways.

Firstly, the Commission holds an 'independent' position and the IncludeAbility project was intentionally designed to be a commitment-based engagement model for employing organisations, rather than a paid membership/subscription model. The AHRC is regarded as a reputable and trustworthy organisation and one that large organisations were keen to align with.

> *I like the fact that it's through the Commission, I think that it makes it not as exclusive, and it just gives us some credibility. Whereas there are some other groups that we don't participate in so much anymore because they don't have the credibility. (Employer Network member)*

Hosting by the AHRC helped to bring large organisations to the table and engage CEOs and Diversity and Inclusion Leads directly, enabling a greater impact across the organisations involved. Involvement in the initiative was particularly important for the Diversity and Inclusion Leads from large organisations, who benefited from having a collective of people they could draw from to frame up and drive their own diversity and inclusion agenda internally.

> *And my view is even just some of the CEO discussions that happen and the accountability that's on the CEO to attend those meetings with the Commissioner actually holds a lot of weight. (Employer Network member)*

> *We're in our second year of implementation now and because [consultant] had connections with [Commissioner] from her time in the Commission, we were really pleased to have a request to test our interest in joining a founding group of employers for IncludeAbility. (Employer Network member)*

> *[Q Do you think that [organisation] would have been so keen to join the IncludeAbility project if it wasn't part of the Human Rights Commission – the Commission being the*

lead on this? Was that something that attracted [organisation's] interest?]

Yes. Absolutely. And I think it holds a lot more, just even 'Human Rights Commission' being that name in itself, I think, brings a lot of accountability to the business as well. So, I think it makes a big difference. (Pilot Employing organisation)

The IncludeAbility branding resulted in individuals and organisations perceiving that they were part of a campaign that was making a real difference.

I think when it comes to employment, there's really for me two components. One is at the top, it's really around the commitment. You know if an organisation is not absolutely committed to this and the leadership team is driving the results expecting to see metrics, expecting to see the employment happening here, the stories and being engaged with it like a campaign, then it's not going to happen. (Pilot Employing organisation)

Secondly, the AHRC's role as the body that addresses disability discrimination complaints was considered significant, especially for large organisations who had experience in complaints processes initiated by staff.

I liked the positioning within the Human Rights Commission because I felt like - they so often get complaints about, you know, disability discrimination and all the rest, and they can use that information to be able to take it back to 'hey, and these are some of the things that we can all do together to reduce that likelihood'. So, for me, but I had to be honest in terms of your question, I hadn't considered it sitting anywhere else. But that's why that's part of why I liked it sitting where it was sitting, because it felt like 'who better to know about the discrimination that people face in the workplace than the people who have to deal with it every day?'. (Employer Network member)

There was a perception that an initiative to support organisations to improve their inclusiveness around disability would be beneficial to organisations who wish to reduce their involvement in the formal complaints process. This was heightened by the focus on workplace adjustments and strategies to build disability confidence of organisations, which a number of organisations felt directly addressed the causes of the complaints they had been involved in.

For me, it was from a strategic [perspective] - outside of what I would call the IncludeAbility network - it was certainly seen as advantageous for us as a large corporate to be working collegiately with the Commission, because otherwise the involvement with the Commission is always going to be seen as adversarial

because the only time we met with them was when lawyers were across the room from each other in a conciliation. (Employer Network member)

The IncludeAbility brand and AHRC lead were also important in bringing a broader range of partners to the initiative. For example, disability support providers (intermediaries) described feeling proud to be invited to participate in the initiative and this heightened their resolve to ensure that there were successful outcomes for people with disability, for the Commission and for their partners more broadly.

I was aware of IncludeAbility as a project through networks and the disability space. And then I wanted [organisation] to be involved. So, through a mutual connection I was put in touch with the Commission and then I went about trying to convince them to get us involved. And then at the same time. I was following the appointment of the Disability and Inclusion Lead in [organisation] recently, so I'd followed him through LinkedIn and then I reached out to him as new in the role as a sort of peer and said, 'listen, I'm trying to get [involved in] IncludeAbility. You're a partner - let's explore the opportunity to triangulate here'. And then, after just a couple of months, those conversations really led to us being chosen as a partner. (Intermediary)

The AHRC leading the initiative meant a stronger focus on people with disabilities having a right to work, and a shift to 'making it happen'. The Commission's interest in human rights across life areas aligned with the reason pilot employees wanted to work as part of their life goals, including '*having something to do*', *a sense of achieving something and 'being active' (Pilot Employees).*

The sense of collective achievement across IncludeAbility partners was significant and, for several people, being part of the AHRC-led IncludeAbility project, and particularly the pilots, was seen as a career highlight.

Ingredient #2: Safe spaces and a culture of learning

Across all of the activities IncludeAbility established, there was a culture of learning and safety. This was particularly important given that organisations report a lack of confidence talking about disability and to people with disability as a barrier. As discussed above, this lack of confidence leads to people with disabilities failing to receive the accommodations and extra support they require in employment. As described by one Ambassador, the provision of opportunities to gain training and to ask sometimes sensitive questions builds confidence and trust in the process.

You know, the one that I've really followed most closely has been the [Pilot Employing organisation in Pilot 1] involvement. I spoke to the managers that were

coming on board for the pilot over in Perth ... And then to hear back that almost
all the participants involved in that strategy are now going to be kept on board in
ongoing roles says a lot about the approach of ....preparing teams and skilling
them up and giving them a chance to ask the questions that they're
uncomfortable about or allay their fears before you bring a person [with disability]
into a workplace, so it's not a surprise, I think it provides a smoother landing for
everyone. That's not to say that means that that's going to be perfect and there
would not be issues, but I think that communication is key and setting people up
for success to me has really demonstrated that the fruit of that is that [ongoing
employment in that pilot site] now (IncludeAbility Ambassador).

For large organisations, the Employer Network created a culture of safety and learning as well as
providing opportunities for exchange of information and ideas.

What I found beneficial in IncludeAbility was having discussions with other D&I
[Diversity and Inclusion] professionals about – I'll give you an example. So, I've
worked with [another Employer Network member] on 'how do you work with Job
Access because you're in a large organisation like us, with a little bit of manual
handling built in there, obviously some assistive technology, some potential Job
Access cases in there, what's your way of working with Job Access?' And it was
through that discussion -that I would have only made that link through
IncludeAbility - that ...we've got access to the same exemption as what [other
organisation] has for seasonal workers over Christmas, for example. (Employer
Network member).

Employer Network members benefited from being part of a 'collective' of large organisations
with a similar goal to increase workplace opportunities for people with disability. The creation of
a network enabled learning from a range of 'actors' including AHRC staff, people with disability
and other network member organisations, particularly those who were more advanced in their
journey. The Employer Network also enabled 'disability employment champions' to emerge,
people who will continue to drive change within their own organisation and in the community
more widely.

Pilot employing organisations, in particular, felt that the creation of a safe space was critical to
the success of the pilot. They recognised that mistakes would be made, however the focus on
the process of 'getting it right' meant they had the confidence to reach out to both the AHRC and
their intermediary to solve problems as they arose. The Illawarra and South Coast pilot site
developed a regular 'online feedback session' which acted as a Community of Practice. It was
chaired by an IncludeAbility Ambassador, which attendees felt made it a safe space.

[The Community of Practice] has enabled conversations to happen in a safe environment, in a safe space to then get that help and support for organisations that are being vulnerable enough to put their hand up and go 'hey, can I be on this journey with you guys?' (Intermediary)

Similarly, this sense of safety and support extended to employees with disability. Pilot employees noted the support they had received from their new employer which had helped them to settle in.

No one has been judgemental. They just help me fix it. (Pilot Employee)

Well, I started today in [new store] and it was a really good day. I jumped on a register. I was buddied up with someone and he helped me, which was very nice of him. And it went well, and my manager thought I did a good job today and it was a really good first day, it really was. (Pilot Employee)

In the Perth pilot, pilot employees commented on the support they received from their employer, the intermediary and from their families, which increased their confidence and made them comfortable.

Getting to know my line manager before starting worked well for me. (Pilot Employee)

Pilot employing organisations had confidence in the intermediary appointed to work with them in their pilot fand felt that the disability organisations were trusted. This was based initially on a sense that the intermediaries had been chosen and 'vetted' by the IncludeAbility project, with trust growing over time as intermediaries worked 'shoulder to shoulder', building understanding of the company and being relied upon to offer solutions and support.

Ingredient #3: Access to high quality information, resources, and training

The information, resources, and training made available through the IncludeAbility project was widely considered to be of high quality, relevant and useful.

The use of Ambassadors with disability provided Employer Network members with the opportunity to hear firsthand about their lived experience, in particular in relation to employment.

I think one of the things they did really well was the storytelling: stories about real people. There were really diverse types of disability, diverse types of jobs. I think that storytelling [is critical] because I think the myth busting is really critical when it comes to disability. (Employer Network member)

We've learned a lot through the project about some of the things that we need to do, particularly just even in simple things like language, in interviewing processes, having different spaces even for interviews. I think reflecting on some of the things that people with disability [Ambassadors] have said in the various sessions that we've had as part of the IncludeAbility project. (Employer Network member)

The IncludeAbility website was considered to be highly useful across a range of partners, offering:

an easily accessible, simple to follow set of best practice principles -I regularly send them to teams throughout my firm who are looking at accessibility issues (Survey, Employer Network member)

Website usage statistics indicate that website engagement is increasing year on year, from approximately 56,000 page views in the nine months from inception (September 2021 to June 2022), to approximately 46,000 page views in the following six months period (AHRC, 2022a, 2023). Intermediaries reported referring employing organisations to the website for resources and information.

IncludeAbility had an endless array of resources and things that we could tap into which just made things much more accessible for us to get content and to get what we need to do that support as well. We've even crafted an eLearn. IncludeAbility were very open with sharing their resources to be able to do that for our team as well. (Pilot Employing organisation)

One participant noted that there is a plethora of websites available related to employment of people with disabilities which made it difficult to know which to trust. The AHRC was regarded as a trusted organisation and the website itself contained resources and information that were practical and helpful.

AHRC staff were considered to have a deep knowledge about employment and disability, particularly drawing from what was known about the key drivers of complaints of discrimination to the Commission. AHRC staff also demonstrated a strong commitment to working collaboratively with IncludeAbility partners to build a successful project, being 'on call' to pilot employing organisations to address issues arising. The training provided by AHRC staff was particularly well regarded, with the focus on practical strategies to provide accommodations being highly valued.

For me, the training in which [AHRC staff member] came and she delivered the training - we did that in conjunction with each other. We had IncludeAbility, [organisation] and the [intermediary]. I think that's absolutely key, and I think that

if we were to look at it in a larger scale and if we're just talking [employing organisation] then that face-to-face training was so valuable to shift someone's mindset at the start of the day when you're going into one of the sessions to where they were when they walked away in the afternoon. (Pilot Employing organisation)

There has been a significant uplift in disability confidence and capability as well, just purely because of that process and the fact that we had access to the resources that were available. (Pilot Employing organisation)

A key component in the training, and in the provision of direct supports and advice during the pilots, was the expertise and seniority of AHRC personnel involved.

A critical point of difference is subject matter knowledge. Having senior AHRC staff with a significant background in disability discrimination matters provide support and training is something that is unique. (AHRC Representative)

Training was adapted into an eLearn module, 'Building a culture of accessibility and inclusion', containing text, video and audio content of approximately 20 minutes duration. The eLearn was subsequently hosted on the IncludeAbility website and adopted/adapted by several Employer Network members (AHRC, 2023). While there is currently no capability to track enrolments (as registration has been deliberately avoided so as to minimise barriers to uptake), results from 354 people who completed the embedded evaluation survey show an almost universal assessment of the value of the course, increasing knowledge of direct relevance to the workplace. Many course completers commented on the impact of learning about the range and prevalence of disability in Australia and the interaction between disability and environment. Many also identified new insights into workplace changes to support inclusion:

People who have disabilities should be encouraged to apply for roles in the workplace and employers should encourage hiring people with disabilities. We just need to think outside the square how to help the person be able to complete work tasks in an environment that may not suit them due to the employer not making it accessible to all and just thinking outside the box how to make it work in a different way instead the stereotypical way which only benefits a certain type of group or person. Also, job sharing and or rearranging roles so the people who can can, and the people who can't can. (eLearn completer)

While in its infancy, the Commission identified the value of the pilots to the activity of building highly relevant and practical resources for the website.

We'll use those pilots to drive content development with real-life examples on the website, so it's much more engaging. People want to read about something that's happened, …It's very different to say that 'within Western Australia, this is what's happened, it happened last year'. (AHRC Representative)

Ingredient #4: Enabled piloting and prototyping

Overall, pilot employing organisations noted that the pilots provided '*tangible, very direct impact' (Pilot Employing organisation)*. Engaging in a pilot supported several Employer Network members to deeply understand how employment of people with disability could work within their organisation. Pilots enabled processes to be developed as needed, problems to be solved in real time and barriers to be identified across various levels of the organisation, with the additional support available via being part of a 'pilot'.

Pilots were 'place-based' which provided a bounded context for large employing organisations within which to operationalise 'solutions'.

I think the reason why the pilots are better is they're often location specific, which means that a big employer can allocate resources to a specific location and see if the pilot concept would work in multiple locations. (AHRC Representative)

Once the design of the pilots had evolved, they offered a clear framework and set of activities with which employing organisations felt confident to engage. This is a substantial asset for use in future iterations of IncludeAbility.

We [AHRC] were not, early on in the program, able to give certainty as to what our contribution would be, as to what their [pilot employing organisation] role would be, as to how a program would run, and because of that, that created angst and unwillingness to participate. Having a clear structure on involvement and support makes it easier for organisations to commit resources. (AHRC Representative)

Pilots had value beyond initial 'testing'. Pilots, through the collaborative work between all parties, began to generate solutions that in turn became replicable as guides to solve other problems.

There's 120 stores across … W.A. [and], it's not having each store do their own thing with their local providers [DES], it's having the business in itself have some people [intermediaries] that can give the store managers kind of permission, guidance and go, 'hey, we've got this meeting, this person's happening, we've sourced the people, this is just what you need to do as a store manager'. Having that kick start and process guide for what a store manager needs to do, it means

that they're not the ones having to go and figure it out by themselves. It's kind of 'it's here ready for you and we're here to help you through it'. If we didn't have the pilot or the project, then this wouldn't necessarily happen organically (Pilot Employing organisation)

The pilots provided a mechanism that could be 'prototyped' and applied to other parts of the business. This notion of a 'prototype' helped the employing organisations to formulate ideas and strategies regarding scaling and replicating the employment of people with disabilities more broadly across their organisations and supported the creation of internal systems that would support that. One pilot employing organisation discussed the next stage of thinking around how to sustainably replicate the approach from the pilots:

I needed to find what was the line that we could do things sustainably across the organisation but still get the same results [as the pilot], so that's been a lot of my work at a strategic level. (Pilot Employing organisation)

The learnings from the pilot acted like a type of 'playbook', useful both internally but also to other companies.

If I was a company that hadn't already done a pilot, I think what would be useful for me is if we, as a result of doing our pilot, came out with a playbook of 'this is what worked well, this is what didn't work well', so that an organisation that was just teetering on the edge of, 'Is this worthwhile work? Is this work that we feel we can get our hands around?', if you had a playbook, if you had something which just spelled out a little bit, a few of the tips and the tricks, that might be enough to convince a senior management group to go, 'Yeah, confident we can do this'. To me, that's what the existing pilots can bring to the table. (Pilot Employing organisation)

In conjunction with prototyping, pilot employing organisations also identified the need to 'lift out' learnings from the pilot and implement broader organisational change to overcome identified barriers and embed inclusive mechanisms as 'business as usual'.

[Q. And so the learnings from the pilot are going to be lifted up out of the pilot stores and because of your involvement, are going to be nationalised to some extent?]

Yes, that's my role to see – if this was an issue during the pilot for this specific cohort of 20 people, I know that we've got ... at a national level, that we've got 10 times the amount of people that look like that one individual that was in the pilot,

if not more. So, my role is to raise those issues up to the broader group to do the systemic solve. (Pilot Employing organisation)

The pilot to prototype model is discussed further below in 'Implications for the future of IncludeAbility'.

Ingredient #5: Shoulder to shoulder support and joined up systems

The use of pilots enabled the joining up of different parts of the system to create an employment opportunity for people with disability. In particular, it activated a range of 'activities' that when joined together, created the enabling environment people with disabilities require.

Intermediaries were a critical piece of these interconnecting supports, and an important innovation of the IncludeAbility project. Intermediaries needed to be values-driven with a commitment to people with disability being in community-based employment. Given that in this project, the intermediaries received no additional funding to provide the supports, the organisations that participated tended to be larger in size, entrepreneurial in nature, with some flexibility to allocate unfunded resources. To ensure their commitment and capacity, initial discussions were held at the level of CEO and Commissioner.

> *For the service partners or the partners in the communities there is a need for an alignment in values and the capacity for the organisation to take risks and commit resources. This is not possible for every organisation. (AHRC Representative)*

The use of intermediaries, who have a deep knowledge of disability and of the people they support, was valuable to the pilot employing organisations in the Perth pilot:

> *The employees had already worked for them [the intermediary], so they knew them. They [the intermediary] were saying, 'actually they do really well with us - they do this or don't do this', and, you know, to get that learned experience on how to manage those team [members]. (Pilot Employing organisation)*

One key ingredient that benefited both the pilot employing organisations and the employees with disability was the amount of hands-on support – called '*shoulder to shoulde*r' support by one pilot employing organisation - that was made available.

> *I just find that probably we need a lot more 'shoulder to shoulder' support and when you do get that, and you get the support workers with them, and they learn the skill set of [the organisation] ...there's a massive learning experience for them as well. (Pilot Employing organisation)*

I think having that on ground support has been massive for the team with helping the team understand how to break down some of those barriers. (Pilot Employing organisation)

The intermediary in pilot 1 offered a specialised kind of support that was a blend of significant disability expertise, deep knowledge of each individual employee with disability, ongoing engagement with the employing organisation and a strong commitment to the success of the project.

That's why working with [intermediary] on such a close basis was good because we could actually say, 'This is what we need from you as the recruiter' because that's largely what we saw them as. I know they're not, but in the context of the IncludeAbility project, that's what they were to us, is they were simply providing us with the recruitment of certain team members.... [Where they differed from a DES provider was] the amount of information that they had about the individual that they were supporting... It was not a tick box approach to getting a person in a role and then dusting your hands off and walking away, which is what we sadly see with DES providers all too often. It was truly that they wanted to make sure that the role suited that actual individual and that was what made the difference. (Pilot Employing organisation)

Comprehensive support was also provided to pilot employees, led by the intermediary but engaging all stakeholders, including family members. One pilot employee recognised that various people had helped to make her new job a reality:

Well, I think it was everyone and everything. Like [intermediary], she really helped me, and my managers and my dad has been so patient with me. So honestly, it's just the people that's been helping me, that's the most important thing, I think. (Pilot Employee)

Data from the post pilot surveys demonstrates that employees from both pilot sites consistently credited the support provided by the intermediary as very important, sometimes viewing this as well aligned or blended with the direct support in the workplace from their immediate supervisors.

Involvement in the Pilot activated the availability of new supports for people with disability involved in them, from the same organisations they had been involved with prior to the pilot. One pilot employee described himself as '*used to being disappointed by similar government initiatives*'. However, the IncludeAbility pilot is the only one that's been helpful. He noted that he

had not changed employment services provider, but rather it was the support from the provider that had changed.

Finally, as described elsewhere, the AHRC staff of IncludeAbility were a key element of the 'shoulder to shoulder' support provided, and worked continuously to ensure information flow and alignment between the intentions of IncludeAbility, and the operationalising of these in strategies adopted by the intermediaries and pilot employing organisation. The AHRC was an active partner in all stages of the pilots, initiating pilot launches, visiting sites, meeting employing organisations and employees, attending Communities of Practice, managing information sharing and data collection, and attending wrap-up events.

Implications for the future of IncludeAbility

Implication #1: AHRC is the right host

There is consistent commentary about the value of having IncludeAbility hosted by the AHRC. The Commission is trusted and reputable, and employing organisations welcome the opportunity to be working productively with the Commission on a project to build employment opportunities for people with disability, instead of being engaged in complaints procedures. The Commission's role and expertise in disability discrimination and human rights both positions the project as 'rights' focused while also transferring deep knowledge of the problems and solutions from the complaints element of the Commission's work into the project. Employing organisations and intermediaries identify broad value in being part of the project through the association with the Commission, even beyond the learnings they may come away with, and in this context, the AHRC has reputational 'pull'.

There is a clear logic for the AHRC as host of the IncludeAbility project. The AHRC has a pre-existing role and authority in relation to the employment of people with disability. It is a public educator in relation to disability discrimination and reasonable adjustments, and a key port of call for information about employment of people with disability. It has a public communication infrastructure (i.e., a national website and related resources, as well as links to the media) targeting broader community awareness and change. It is also a complaints arbiter with deep knowledge of what goes wrong in employment settings for people with disability. The Commission has a policy advice and advocacy role and is well positioned to connect learnings from the project into policy development.

Finally, the Commission is uniquely placed to support long term change.

> One of the benefits of the Commission is that we actually can, because of our other infrastructure, facilitate long-term change without sacrificing our values. (AHRC Representative)

Implication #2: The need for pilots and prototyping

Overall, commentary on the pilots has yielded a model of implementation for the future. While the IncludeAbility project, largely via the Employer Network, already engaged with employing organisations at senior levels, the pilots further expanded this targeting of activity across a wider range of levels. Pilot employing organisations and employees with disability were supported in multiple ways, and at different levels of the organisation, via both the Commission and the selected intermediary.

The success of the pilots is based on bringing together the various elements of IncludeAbility that target different layers of the employing organisation and customising this to each organisation's needs in a bespoke way.

An emerging model for pilots as an employing organisation-specific initiative in disability employment is presented below in Figure 1. This describes the focus of activity at each organisational layer, with supports provided both by the AHRC and the intermediary.

Figure 1: IncludeAbility pilot implementation model
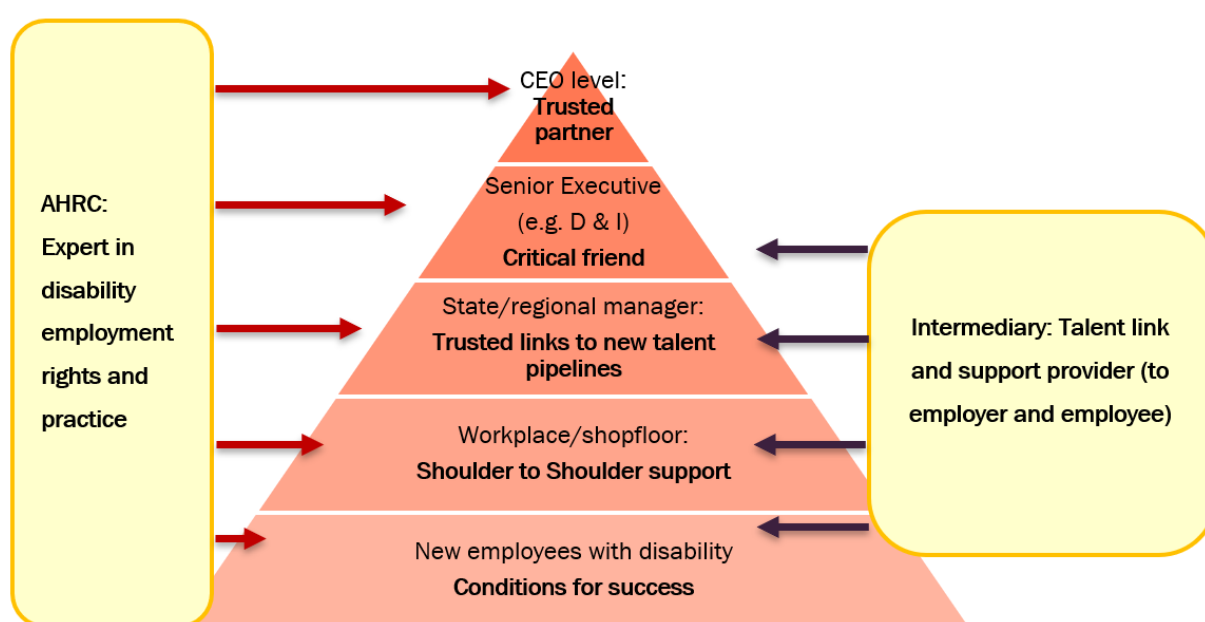
The pilots require activity at all levels of the employing organisation, which appears to be a unique feature of this employment initiative. Pilot interviewees discussed how these elements tied together:
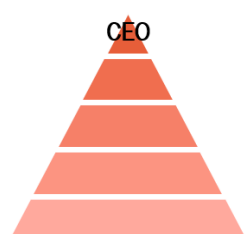
CEO level: CEOs are engaged through the Employer Network and are required to commit to the initiative. For them, the Commission is a **trusted partner** to engage with to progress a relevant social and business issue. When this works well, and CEOs engage fully, it is a partnership to facilitate change rather than simply offering a branded affiliation. The AHRC Disability Discrimination Commissioner plays a key role at this level of Executive leadership, initiating and maintaining engagement, also connecting through to senior government members.
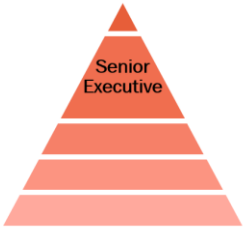
Senior Executive level (e.g., Diversity and Inclusion Lead): The Senior Executive level, such as the Diversity and Inclusion Leads, value a **critical friend**, in the form of the AHRC, and also in others they connect to through the project. They were involved in Employer Network activities as well as having key roles within their organisation and in the pilot. Involvement provides a mechanism to progress Diversity and Inclusion goals internally. They require a safe space and a culture of learning where it is accepted that mistakes will be made. Through the activities of the Employer Network, training, involvement in pilots and, in some cases, Communities of Practice, they are offered a connection to like-minded individuals and organisations who are on the same journey. In this context, it is helpful that people/organisations are at different stages of the journey as this helps with learning. Involvement enables access to content that challenges mindsets and unconscious bias, opens up thinking, provides a different perspective and provides potential solutions and ideas. Access to advice (i.e., through the Health Check) provides structure and impetus to improve. This group is connected to a trusted and diverse knowledge base (website, Ambassadors, resources) as well as committed and expert staff with appropriate levels of seniority to facilitate peer-to-peer discussion (i.e., senior AHRC staff). These experiences support the identification of company barriers (especially structural ones) and development of strategies to address these. The pilots enrich this via first-hand experience of people with disabilities and their knowledge, and highlight the solutions to employment barriers.

State/regional management level: The branding of IncludeAbility (hosted by the AHRC) is valuable to this group in order to bring people together across the organisation/company around a brand aligned initiative. This is unlikely to happen organically and requires the involvement of IncludeAbility. Involvement in the pilot enables a shift from 'should we' to 'how do we' employ people with disability through access to **trusted partners/supports** at the 'ground level' to deliver what the organisation (e.g., stores) need. The change in thinking about 'accommodations' – such as asking all candidates and employees what accommodations would support them in the workplace - is supported by the trusted partners of the

pilot (both the Commission and the local intermediary). Managers are linked with a local intermediary, vetted by the AHRC, that can open up **new talent pipelines**. Face to face training for local leaders builds grounded disability knowledge (i.e., 'we know how to employ people'), identification of company barriers (especially structural ones) and development of strategies to address these which can be endorsed/authorised at this level of management.

Workplace level: At the coalface where pilot employees are located, employing organisation staff (supervisors and site managers) value **shoulder to shoulder support** from both the intermediary and the Commission. This includes support to adjust recruitment and onboarding processes. The intermediary brings deep knowledge about the individual employees and the accommodations they need along with support to implement them across the duration of the pilot. The trusted partners of the Commission and the intermediary help solve problems and build disability confidence, offering a safe space to ask questions and discuss concerns, in an ongoing way.

New employees with disability. The pilot focuses attention on '**conditions for success**'. These include pathways to employment that bypass the usual recruitment processes; a paid job with real/award pay; accommodations in the workplace to improve job fit; supportive, positive managers who are prepared to problem solve; and ground level support to do this. Intermediaries support both managers and employees if problems arise.

Two key supports in this process are:

The Australian Human Rights Commission: The Commission offers support to all levels of the organisation, including guidance and advice, training, connection to intermediaries and on-the-ground support to pilot sites. The expert knowledge base of the AHRC is deemed helpful by employing organisations and intermediaries and provides an authorising environment within which to make change.

Intermediaries. The intermediaries build a partnership with an employing organisation, providing links to a suitable talent pool, detailed information about each potential employee and the workplace supports needed, translation of accommodations, introduction and orientation for employees, support with onboarding and ongoing triage.

The IncludeAbility project made visible that barriers to employment for people with disability are not universal – they vary across different organisations and workplaces. Therefore, undertaking a pilot provides organisations and workplaces with the resources and time to develop a deeper understanding of their own barriers to employment of people with disability and to begin to address them.

As described by one pilot employing organisation, the pilot phase is the first step to prototype the design of an implementation model that is employing organisation specific, addressing the specific organisational context, building knowledge on customisation and accommodations for specific roles or job types, and building organisational disability confidence. Each of the pilot employing organisations was able to identify specific barriers within their own organisation and within the different workplaces they operate, all of which require strategies to address. Undertaking a pilot as a first step enables that initial learning to occur. Then, as problems are solved and barriers are addressed, a 'prototype' develops whereby others in the same organisation can be provided with a set of learnings or protocols – an implementation model - that specifically addresses the organisational barriers identified. This process increases the likelihood of replicability and scalability within specific organisations. In addition, the involvement of various levels of leadership, including a Diversity and Inclusion Lead, People and Culture Managers, State and Territory Managers and Store Managers supports learning being embedded across organisations.

This implementation model can then be rolled out in further sites or parts of the organisation, building learning, and iterating the design in each roll out. Future cycles of the roll out might decide to focus on different aspects of the business or on different cohorts of potential employees with disability (e.g., school leavers, graduates, or specific disability cohorts). Some aspects of the pilot may be taken over and embedded via activity at different levels of the organisation, such as disability awareness training being built into organisational Learning Management Systems. The role of the Commission continues through each iteration, though fading over time. A key function of the Commission is to document the key learnings and respond to the support needs of the organisation, as well as being a linker to potential intermediaries.

Figure 2: Iterative learning process: pilot to organisation-wide roll out (Pilot as prototype for roll out design)
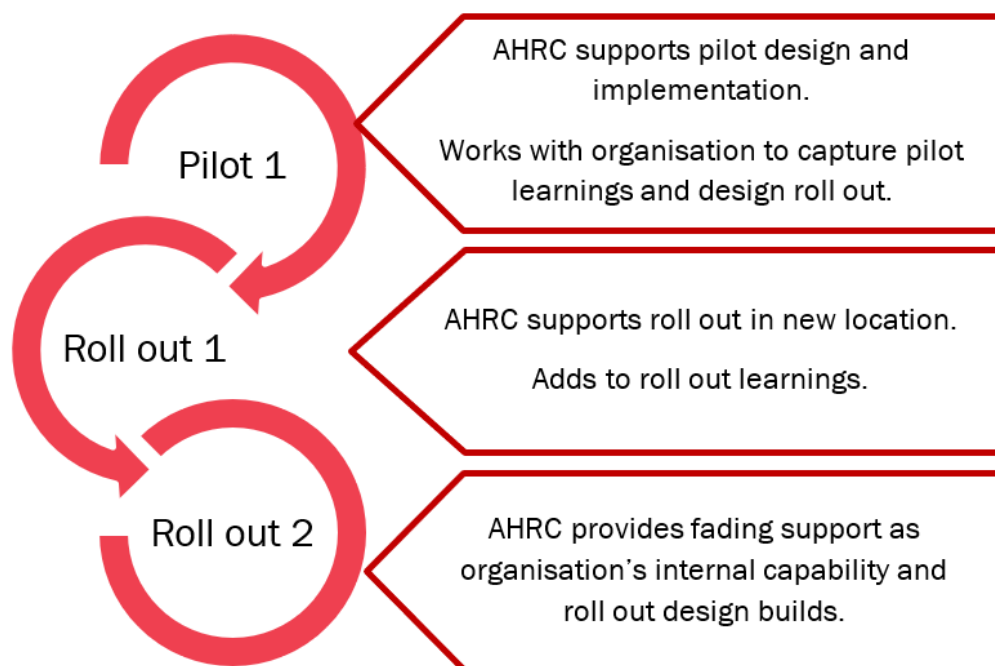
Implication #3: Continue to build deep knowledge of 'how to' employ people with disability for large employing organisations

The IncludeAbility project has supported large employing organisations to consider and increase their employment of people with disability in a range of ways, with employing organisations finding it a valuable process. The project has offered a multi-level approach (as explained above in Figure 1) and has also achieved increased confidence and action at the 'coal face', which is unusual.

There is a need to continue to build deep knowledge of the 'how to' employ people with disability among large employing organisations. The Employer Network, Ambassadors, high quality resources and training, and pilots are all mechanisms of this. While each of these elements make an ongoing contribution to the effectiveness of IncludeAbility, the high value of the pilots warrants a shift in emphasis and resources to this component as a key mechanism of building 'how to' skills.

> It would be good to have a way of looking at sustainable models ... I think
> IncludeAbility is a series of [parts] – it's not just...one model. It's actually got a

whole bunch of different parts to it, and you can take different parts and use them. What I would say is that if the next model was funded, it would be the [Employer] Network model is scaled down, because it's an incredible amount of work, and the pilots would be scaled up. I think that would increase the social impact. (AHRC Representative)

While the pilots have been considered in depth in Implication #2 above, another key element of the model as a mechanism of building 'how to' knowledge is that of the Employer Network.

While employing organisations were keen to join the Employer Network, their participation and engagement over the nearly three-year period varied from superficial to deep engagement. The Covid-19 pandemic may have influenced some organisation's level of involvement. However, a key learning from the project to date is the understanding of these 'two tracks' (AHRC Representative) and that resources are better allocated to working with the engaged members towards supporting them to action real, on-the-ground change in employment outcomes.

It's better to make it [Employer Network] much tighter with ... a greater need for engagement and continuous proven engagement to stay within the network. (AHRC Representative)

Even within a focus on a more engaged and active membership, decisions about Network size and longevity need further consideration. As part of ensuring members commit to action (a key mechanism of learning 'how to'), a trajectory of moving new members into the Employer Network, supporting their development through Network activities, moving them into participation in pilots in a second or subsequent year, and into ongoing prototyping in later years, may be one design option. Possibly those who have engaged across different activity levels might form an Alumni who may engage in different types and frequencies of activities.

I would love to see maybe an alumni or something like that where we can still connect into bits and pieces of that, or whether it's the CEO sessions or to report back. I'd love to see something like that to hold the accountability that human rights have with our business. And I'd like to see us keep accelerating and I think IncludeAbility helps us to do that quite significantly so. (Employer Network member)

It is also important to consider how to increase the relevance of the Network to members with diverse needs and experiences, so as to maximise their opportunities to extend their knowledge and organisational capabilities.

The 17 Employer Network members were drawn from a range of industries and had varied experience in facilitating inclusive workplace cultures for people with disability, reflecting a range

of 'organisational maturity' in implementing a disability inclusion agenda. While topics presented in Employer Networks were based on feedback from members, some members felt that some of the presentations and other events were pitched too low for organisations that are 'ahead of the curve'. On the other hand, Employer Network members commonly reported value in learning from others. Employer Network members who were 'starting out' valued hearing from other employing organisations in the network about the practical actions they took to create change. This diversity creates significant tensions in designing Employer Network activities and interactions that are valuable to all members.

Several Employer Network members felt that rather than treating Network members as a single cohort, they could be 'streamed' into subgroups. A range of options have been canvassed by interviewees including being streamed:

- By location, taking a place-based approach, such as was used and highly valued in the 'Community of Practice' approach in the Illawarra pilot. Place-based or regional networks of employing organisations have been shown to be an effective strategy to collaborate to increase the employment of people with disability (Shogren et al, 2017).

- By needs, interests or common barriers to employment of people with disability, for example, recruitment and onboarding practices. One way to shape this might be to focus on a common 'Achilles heel', as suggested by one Employment Network member. Inaccessible technology was one such 'Achilles heel' identified by several members.

> *Whether or not it's by company size or not, or rather there's a couple of different streams offered. You know, what's your Achilles heel? What do you want to get out of it? And you pick your top three and then they might have a stream of [accessible] technology, a stream of premises, or a stream of procurement. Because I know procurement for most organisations, particularly large organisations, procurement is the number one Achilles heel, so maybe you do that and then the organisations who are members opt into a stream. But it's important to connect everyone as well. (Employer Network Member)*

Using this approach would also enable members to support each other as they learn and grow their understanding. However, mechanisms to include those 'ahead of the curve' as exemplars to learn from would need to be considered, possibly through a mentoring approach where organisations with more 'maturity' on a topic might act as mentor to the group. An advantage of this approach is that it could enable organisations to be positioned as both leaders and learners on different topics, as organisational maturity is unlikely to be consistent across all topic areas.

- By interests or 'solution' focus. The data, particularly the Health Checks, identifies that some organisations are weak in some areas of inclusion, such as using work experience or targeted recruitment strategies. Network groups might be convened around common intentions to operationalise some of these 'solutions' such as implementing more intentional work experience schemes, including working to convert unpaid work experience into a paid job; or establishing other talent pipelines, such as directly from school/special schools and TAFEs.

- By industry sector. However, as one Employer Network member explained, issues of business competition are not absent, so creating industry-specific Employer Network 'chapters' or groups may not work as the businesses are likely to be commercially competitive.

Implication #4: Identifying and 'remediating' system gaps

The data makes visible gaps and barriers across a range of systems, particularly within employing organisations and within the employment services system. IncludeAbility has played a role in surfacing these barriers and gaps and supporting their remediation. This is a role that is needed utilising a longer-term approach.

Organisations highlighted continuing issues with disclosure of, and asking about, the disability status and needs of their employees and recruits. This highlights deep seated concerns of some employing organisations about the application of Disability Discrimination legislation, as well as fears from potential employees with disability about the result of an employment application if a disability is disclosed. A lack of in-depth knowledge about suitable, practical accommodations and how to have conversations about these, act as disincentives to employing organisations to engage with the employment of people with disability. This points to a need to change the discourse and focus to identifying the necessary 'conditions for success' of employees (in a normative way) – where the culture of organisations seeks to reinforce these for all employees rather than narrowly focusing on employees with disability. This is an inclusive paradigm shift that could be led by the Commission, as well as continuing to improve discussions about disability-specific accommodations.

Coupled with this issue is a range of organisational drivers (e.g., KPIs linked to narrow productivity metrics, job descriptions with outdated inherent requirements, narrowly targeted recruitment practices, lack of autonomy to customise approaches), hidden in 'business as usual' (BAU) at all levels of large employing organisations. These BAU elements function to exclude people with disability in ways rarely visible. For some organisations, the process of the annual Health Checks highlighted these issues, and for others it was through conversations with

Network members or Ambassadors, or other resources. The pilots functioned as a super-charged mechanism to surface these issues. In this context, IncludeAbility provided a lens to identify these issues and a trusted, expert source of information and support to address them. The multi-level model, discussed above, ensured that the necessary range of organisational stakeholders were engaged in the change process. Supporting employing organisations to make visible and to address these institutional barriers, operating at all levels of the organisation, is necessary.

Some employing organisations are already identifying significant systemic issues in the field of disability employment, such as the lack of trusted intermediaries in the current DES system, and the routine use of the Supported Wage system when employing people with intellectual disability. One pilot employing organisation explained how the pilot had highlighted concerns about the use of Supported Wages within the organisation.

> *Well, we're employing [most of the pilot employees with intellectual disability] moving forward and that's on a full award wage without looking at any potential for productivity reimbursement from government. So that to me in and of itself tells me that the store teams on the ground think that they're getting a good employee, being paid fairly for a good day's work. And I think that also does shine a light… on the Supported Wage process and framework to at least make you question are all of the people that we're employing under a Supported Wage, are they genuine Supported Wage cases or could they have been working at an award wage role for a number of years?… It's always our worry, as a large corporate, that a lot of that decision making on, 'is this person a good Supported Wage candidate or not?', is done before we actually get to [sight] the person and see how they work and provide any needed reasonable adjustments which may aid them. (Pilot Employing organisation)*

Systemic issues such as this are well suited to the engagement of the AHRC, further reinforcing the value of the Commission as host of such a project that engages with some of the largest employing organisations in Australia.

Implication #5: Extended timeframes

Despite being large employing organisations, often with a high level of inclusion maturity, significant barriers to the employment of people with disability remain embedded within different levels of the organisations involved in IncludeAbility. In the Australian population, rates of employment for this cohort have changed little in two decades. This speaks to the substantial shift required.

The IncludeAbility project has operated over a three-year time period. Within this period, each component has taken time to build and to iterate its activities and focus in order to find the most

effective methods of operation. In each instance, partners need to be identified, relationships built, activities planned, delivered and then re-run with new learnings integrated.

> *These projects take years, not months. I actually think that when we put it together we thought that in up to 12 months we would be showing some really clear outputs, and it's actually taken two and a half odd years. This timeframe would be less in the future because of the knowledge that was acquired by Commission staff, but the timeframes are still always longer than you think. (AHRC Representative)*

While the IncludeAbility project has demonstrable outcomes and proof-of-concept of a model of implementing change, without a longer-term implementation and evolution, the changes realised are likely to be limited to only those employing organisations taking part in the pilots to date.

Improvements to the IncludeAbility 'approach'

While implications for the future of IncludeAbility discussed above incorporate data that speaks to areas of improvement and iterations of design, this section captures some remaining elements largely around the underpinning personnel profile of the project. While Ambassadors are not employees of the AHRC, they have been framed as a key personnel group in the project and are included in the discussion below.

The role of Ambassadors

The selection of Ambassadors intentionally focused on diverse individuals, including diversity across disability, professional and personal experiences. Not all Ambassadors were specialists in regard to the employment of people with disability, but many had lived experience of barriers in employment settings. Ambassadors undertook many roles depending on their expertise and availability. They influenced program design by providing program feedback and acting as a 'quality control' mechanism for all IncludeAbility resources. (AHRC Representative)

However, Ambassadors felt they were under-utilised, in that they only presented at a small number of events, and some wanted an increased role in working together to co-design the program. To date, funding has not been available to resource this level of engagement and nor would it be sensible to engage all Ambassadors on all activities.

While Ambassadors are recognised as an important part of IncludeAbility, their role in any future iteration of the project needs further design. Future roles might include Ambassadors as speakers at company events, including those where there is a bigger audience. For example, one employment network member invited an Ambassador to speak at a company event; chairing Communities of Practice (either associated with pilots or with subgroups of the Employer

Network); and working in sub-groups to provide advice on different aspects of the IncludeAbility design and activities.

Project staffing profile

The IncludeAbility project engaged large employing organisations across the breadth of their organisations. Key elements included significant expertise in relation to disability discrimination, as well as levels of seniority commensurate with employing organisation representatives involved. The initial assumptions for project staffing were based on reliance on project staff at lower levels of seniority, who would implement project activities, and present 'scripted' training. However, the model of IncludeAbility as it evolved, highlighted the need for a very high level of expertise in disability discrimination in the workplace and workplace adjustments, as well as staff who could support employing organisations to operationalise change at all levels of the business and organisation. While based on a well-planned curricula, rather than being 'scripted', the training was highly interactive, delving into specifics of workplace issues and adjustments and requiring substantial knowledge of diverse situations. These project design elements highlight a need for senior staff who can work with equivalent levels at Executive and middle management levels, while being a trusted 'authority' for ground-level staff in employing organisations.

> *In reality, you need individuals with significant experience to run the external engagement aspect of the program. That is a project design issue...I think going forward, we would have to have a different philosophy on the level of seniority needed to engage with the stakeholders. (AHRC Representative)*

Policy Implications

The policy and legislative environment related to the employment of people with disability is undergoing change, with further reform proposed by the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability in their findings. Operating in this context, the IncludeAbility project has achieved near 100% success in an area where little has changed at the population level for more than two decades (Commonwealth of Australia, 2023). In addition, IncludeAbility has achieved employment outcomes for a particularly marginalised cohort of people with disability, those with intellectual disability. In part, the approach has utilised a non-traditional talent pipeline and specialist employment support provider, that of Australian Disability Enterprises. Another important element has been the active involvement of large employing organisations through the activities of the Employer Network and the pilots. In this context, IncludeAbility offers some unique insights to inform a range of policy considerations.

Policy implication #1: Reasonable adjustments in the employment of people with disability

Various elements of the current Commonwealth policy environment seek to focus on the inclusion of all people with disability, including significant disability, into community-based employment settings. These include the cessation of the Commonwealth Australian Disability Enterprise program, the introduction of the NDIS, and the proposed *Disability Services and Inclusion Act*, replacing the former *Disability Services Act (DSA), 1986.* Most recently, the Royal Commission (2023) has called for a 'paradigm shift for the rights of people with disability in the workplace' (p. 412) through revision of the *Disability Discrimination Act (DDA), 1992.* Together, this new legislative and policy environment largely removes assumptions that people with significant disability and support needs cannot work in open employment, or on full Award wages, and introduces the expectation that increased employment opportunities will be offered to this cohort.

However, successful employment for people with significant disability is likely to require job customisation, high levels of workplace adjustment and the provision of supports, alongside changes to organisational and business processes within employing organisations. This suite of actions potentially challenges notions of 'reasonable adjustment' (within the *Disability Discrimination Act, 1992*). The Royal Commission (2023) recommends the removal of notions of 'reasonableness' and the introduction of a 'standalone duty on employers and others to make adjustments for people with disability, except where they cause unjustifiable hardship' (p. 413). This revision reinforces the requirement to provide workplace adjustments but also focuses attention on 'unjustifiable hardship' for employers.

In the Perth pilot of IncludeAbility, some workers had significant disability in the form of intellectual or cognitive disability. The level of job customisation, workplace adjustments and supports required a substantial investment of (largely human) resources by employing organisations, intermediaries and the AHRC to create and support a successful employment placement. The pilot highlighted the interconnected suite of activities and adjustments, across multiple levels of the organisation, to suitably accommodate the employee with disability. While the pilot was conducted in the context of one of Australia's largest retailers, this resource impost might be considered 'unjustifiable hardship' in some employment settings. Should employing organisations argue that such levels of adjustment constitute 'unjustifiable hardship', this then has policy implications for government when it aims to increase the employment of this cohort. A policy response may then be required to address who bears the costs and provides the resources to enable the employing organisation to make the necessary level of adjustment and provision of internal organisational supports to enable employment (recognising that supports for the individual employee may be funded by the NDIS).

Overall, as policy and legislation move to enable the claiming of equal rights to employment in community-based settings for people with significant disability this necessarily challenges notions of the extent of adjustments required, the shaping of suitable job roles and of work environments and organisational settings more broadly. Government can move to address this need for expanded supports through both a review of the *Disability Discrimination Act* and translating the forthcoming *Disability Services and Inclusion Ac*t into policy and programs to support or subsidise substantial adjustments. This proposed Act enables government to fund 'incentives or supports' to employers, expanding opportunities to construct suitable funding programs for employing organisations to cover the full gamut of workplace adjustments, and obviating any 'unjustifiable hardship' by virtue of government funding support.

Policy implication #2: The funding and provision of capacity building supports to employing organisations and workplaces

The IncludeAbility pilots identified the need for organisations, including large employing organisations, to be supported to build their capacity to employ people with disability. While employing organisations did not need 'incentives', such as wage subsidies to participate and to employ people with disability on full Award wages, they did need a range of other support.

Supports to employing organisations were provided by both the IncludeAbility team of the AHRC as well as the intermediaries. Employing organisations were supported to build a range of capacities including how to;

- build disability awareness and confidence (across the organisation),

- connect to talent pipelines for well-matched people with disability (including non-DES talent pools such as ADEs),

- ask for and use information about disability and the needs/skills of individuals,

- customise job roles,

- make modifications and adjustments, and

- adjust workplace/organisational/business processes.

Employing organisations required support prior to employee placement, through initial training, and ongoing 'shoulder to shoulder' support post recruitment.

Intermediaries played a key role in employing organisation capacity building and support. Pilots drew on not-for-profit disability organisations for this role, including a DES and an ADE, identifying that they were uniquely positioned to have in-depth knowledge of people with disabilities and the 'conditions for success' necessary in each instance. Translating this knowledge into employer contexts was an important function of employing organisation capacity and confidence building.

However, the level of support provided and the use of a non-DES intermediary, meant that these employer capacity building roles were not funded. In this context, in the case of the pilots, the intermediaries chosen were larger organisations as it was felt that only large organisations would have the business and financial flexibility to carry these unfunded activities. However, in order to scale the approach used in the IncludeAbility pilots, a wider range of intermediaries are needed across Australia, including drawing on smaller organisations with the requisite expertise.

To achieve this, the employing organisation capacity building activities undertaken by intermediaries in the pilots need specific funding. While some funding might be realised through appropriately designed NDIS plans, the employing organisation skills-building activities, and the inter-agency collaboration work with the AHRC (such as the joint delivery of training, hosting Communities of Practice across a regional employer network) is not.

This set of learnings has implications for Commonwealth government policy and legislation in regard to the funding of employing organisation capacity building. This is a policy focus in *The Australian Government's White Paper on Jobs and Opportunities* (Commonwealth of Australia, 2023), with the explicit identification of the need for 'better employer capability building' as part of the enabling of jobs for 'people with high barriers to work' (p. 154). The proposed *Disability Services and Inclusion Act* (2023), provides scope for government to fund employing organisation capacity building within 'incentives or supports' to employers.

The scope of activity in relation to how employing organisation capability building is done, who does it, and the nature of capacity building 'supports' to be provided are areas requiring significant policy shaping in order to best meet the needs of employing organisations and employees with disability. Consideration of these issues is required as part of a broader employment services ecosystem design and also related to the Disability Employment Services reform. The IncludeAbility project has highlighted the potential for a re-shaped market of Employment Service providers with a wider membership, including ADEs, and a wider set of funded activities.

Policy implication #3: Promote opportunities to move between supported employment in an ADE and employment in a community-based setting.

The IncludeAbility project has added to emerging evidence that ADEs can play a role as specialist employment service providers, not only supporting employing organisations to build capacity (Policy Implication #2 above), but also assisting people with disability to move into community-based/ open employment. The pilots have demonstrated that ADEs can support multiple cohorts in this transition, including ADE employees who wish to transition to open employment (whether fully or maintaining employment within the ADE alongside open employment), as well as other jobseekers with disability who are not employees of the ADE. This role as a pathway and broker to open employment is a key strategy in the wider transformation of the ADE sector, and the expansion of the market of employment services providers to meet the needs of people with disability.

The ADE involved in pilot 1 provided a diverse range of supports to underpin the transition into open employment for their participants. These supports echo those identified by the Royal Commission (2023) when describing a reformed Disability Employment Services system and include: 'customised employment approaches' such as 'personalised client assessment, individualised job development and placement, intensive job site training and support, and ongoing support' (RCVANEPD, 2023, p.415). The Royal Commission notes that these are 'time and resource intensive' and not funded in the current DES model (p.415). Similarly, the IncludeAbility pilots demonstrated that through providing these types of additional supports to people with disability, and additional supports to employing organisations (as discussed in Policy Implication #2), successful employment outcomes occur. The Royal Commission's view of the requirements of staff in a reformed DES system also echoes the key ingredients of the pilots:

> Staff in DES providers should be trained to actively engage employers in the DES program, including small to medium-sized enterprises, non-government organisations, and public and private sector organisations. Staff should be

supported to understand the industry they are placing participants in, to facilitate customised employment opportunities and to provide ongoing support to employers (RCVANEPD, 2023, p.417).

The IncludeAbility pilots offer a proof of concept as to the capacity of an ADE to deliver this suite of activities (albeit unfunded in the pilot). While the NDIS can fund some aspects of this role (subject to individual NDIS participants having funds allocated in their plans), the experience of the pilot showed that the NDIS could not fund the whole suite of activities required.

It is important to consider the position of ADEs in the employment services ecosystem. With the replacement of the *Disability Services Act, 1986* with the new *Disability Services and Inclusion Act* (once promulgated), 'supported employment services' (ADEs) will no longer be defined by legislation. This means they no longer are inherently characterised by a defined focus on a 'supported employment' context that is separate from open employment. This enables the re-framing of their role within the broader employment services ecosystem, opening up potential to provide a wide diversity of employment supports, including support to transition people into open employment. In this context, while the Royal Commission (2023) does not consider the role of ADEs within a reform of the DES system, the IncludeAbility pilots make a case to do so. Inclusion of ADEs within a broader market of disability employment service providers, with a wider suite of activities, also meets the requirement of the Royal Commission that people with disability exercise choice and control over not only where they work but who provides the employment supports. In this context, it is important to address the structural barriers currently preventing ADEs from being able to respond to the choice of their employees to provide specialist employment supports to enable their transition into and maintain open employment.

Policy implication #4: Promote a shift to understanding the 'value' of employees with significant disability and the case for full award wage employment

Supported wages are a productivity-based wage payable to individuals with disability under certain conditions. When approved the employee is paid a percentage of the minimum pay rate for their classification, depending on their assessed work productivity. The payment of a supported wage is regulated by the Fair Work Commission and overseen by the Department of Social Services and, in the context of open employment, is enabled in most modern Awards that contain a Supported Wage provision. Supported wages are assessed on an individual, not a group or cohort, basis in the context of an *individual* with disability (who meets the impairment criteria for a Disability Support Pension) in a *specific* job role and workplace. The assessment of productivity is meant to occur following the provision of adjustments and supports, as well as

training and a period of familiarisation with the role. The assessment can further consider the 'match between the individual and the job'; as well as 'desirable changes to task allocation in the work team' to improve overall productivity (Disability Employment Services, 2021, p.18). The extent to which adjustments and job customisation is occurring to maximise productivity is unknown.

Payment of supported wages, or subminimum[1] wages, for a specific group of people with disability has become 'systematised' in employment settings through its long usage and its incorporation into modern Awards. This has served to reinforce assumptions about the low productivity of some groups, particularly people with intellectual disability. As a result, the use of supported wages has become expected as 'business as usual' when employing people with moderate to severe intellectual disability. However, there is little publicly available data about the number of people receiving supported wages in open employment in Australia. The Royal Commission (RCVANEPD, 2023) refers to data that implies there are approximately 20,7000 people on supported wages in Australia, with approximately 5,200 supported wage assessments annually (including new assessments and reviews). Of these, 25% of assessments are in ADEs. There continues to be uptake of supported wage in open employment. For example, there is evidence that in relation to just one funding type within the NDIS (School Leaver Employment Supports), 13% (116) of young people (aged 15-24 years) who commenced a job in the open labour market did so on supported wages during 2022 (NDIS, 2023, p.31). The transitioning of people from ADEs into open employment settings on supported wage, and the payment of supported wage in any setting, requires significant scrutiny to ensure that suitable supports and adjustments have been provided in the job role so as to maximise productivity, and that any assessment for supported wage has met the required standards. Given the policy intent that an increasing diversity of people with disability, including those with significant disability, will enter open employment, increased scrutiny of the provision of suitable adjustments and supports is required.

The requirements of the IncludeAbility pilots specified that individuals employed within pilots must be paid full award wages as opposed to a supported wage. Many had previously held or currently hold other job roles where they were/are paid supported wages. This requirement focused attention on creating the conditions in which the employee could contribute to the organisation or company's overall outcomes and be paid equally for that contribution. It also

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[1] This term adopts the definition used by the Royal Commission (RCVANEPD, 2023, p.480), i.e., 'a wage below the national minimum'.

focused attention on a revised understanding of the 'value' of that employee to the business beyond a limited productivity metric related to job/task performance. Employing organisation representatives in the Employer Network and in the pilots discussed the broader value employees with disability bring, for example reduced staff turnover and absenteeism, better reflection of the diversity of the customer base in the company's workforce profile, undertaking tasks that are not done by other employees, and reputational advantage to the company. Likewise, the Royal Commission (RCVANEPD, 2023) highlighted the requirement to understand employee 'value' from more than an economic perspective, as reinforced by the CRPD.

Through the engagement and support of initiatives like IncludeAbility, employing organisations can be supported to build their skills in customisation and workplace adjustments, and make visible the 'value' of employees with disability to the company. This kind of capacity building of employing organisations and businesses requires explicit attention in policy and can be funded under the provisions of the forthcoming *Disability Services and Inclusion Act.* Policy reform should also consider the role of the Commonwealth government to fund supports and adjustments that might constitute 'unjustifiable hardship' for employing organisations, so as to maximise both the productivity of the employee with disability and the wage paid to them.

Beyond this focus of reform within existing policy and legislative arrangements, the Royal Commission (RCVANEPD, 2023) proposes the ultimate removal of supported wage from the Australian wages system. A range of arguments have been presented in the Royal Commission about the ableist assumptions underpinning capacity/productivity assessment targeting only people with disability, and lack of compliance with human rights and discrimination instruments. The Royal Commission recommends that, consistent with the requirements of the CRPD, supported wages should be phased out by 2034 and meanwhile, the minimum rate of payment should be lifted to 50% of the national minimum or relevant award. In this context, the IncludeAbility pilots have enabled employing organisations to test the process of moving to full Award wages and encourages them to consider how to expand the application of this.

CONCLUSION

Employment was looked at as a key output [of IncludeAbility], because it is ... the end product of a disability policy system that works well. (AHRC Representative)

IncludeAbility addresses a critical issue in Australian society and one that is a pillar of Australia's human rights obligations: equal opportunities for employment for people with diverse disabilities. Poor employment outcomes have been 'called out' within multiple recent Inquiries including the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, and the NDIS Review.

Overall, this data provides evidence that supports the need for long term engagement with large employing organisations to bring about significant change. Despite a range of activities and policies, IncludeAbility has surfaced some of the underlying barriers to employment of people with disability within large organisations. High level policies supporting inclusion are not sufficient alone to achieve increased employment of people with disability. The activities of the IncludeAbility project, and in particular the pilots, show that there is a need to work across multiple levels of the organisations to remove disincentives and barriers to employment and actively introduce necessary strategies and supports to both employing organisations and employees. When there is alignment and communication across levels in an organisation, 'cogs' at all levels can move in the right direction and become mutually reinforcing.
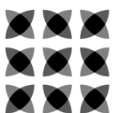
Initiatives such as IncludeAbility can act as a catalyst for this change.

This report offers insight as to potential areas for further design in any future iteration of the project.

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