



Women
With
Disabilities
Australia
(WWDA)

Winner National Violence Prevention Award 1
Winner National Human Rights Award 2
Winner Tasmanian Women's Safety Award 2
Certificate of Merit Australian Crime & Violence Prevention Awards 2
Nominee UN Millennium Peace Prize for Women 2
Nominee French Republic's Human Rights Prize 2
Nominee National Disability Awards 2
Nominee UNESCO Prize for Digital Empowerment of Persons with Disabilities 2

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Jobs and Skills Australia (JSA)

GenderStudy@jobsandskills.gov.au

Submission to: Gender Economic Equality Study Consultation

From: Women With Disabilities Australia (WWDA)

About the Authors

[Women with Disabilities Australia](#) (WWDA) is the National Disabled People's Organisation (DPO) and National Women's Alliance (NWA) for women, girls, feminine identifying, and non-binary people with disabilities in Australia. As a DPO and an NWA, WWDA is governed, run, led, staffed by, and constituted of, women, girls, feminine identifying, and non-binary people with disabilities. Our organisation operates as a transnational human rights organisation - meaning that our work, and the impact of our work, extends beyond Australia. WWDA's work is grounded in a human-rights based framework which links gender and disability issues to a full range of civil, political, economic, social and cultural rights

1. Introduction

Women With Disabilities Australia (WWDA) welcomes the opportunity to contribute to JSA's Gender Economic Equality Study. Our submission draws on WWDA's extensive advocacy history, including responses to the [Response to the Education and Learning Issues Paper of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)ⁱ, the [Disability Employment Services \(DES\) Consumer Engagement Project](#)ⁱⁱ, and systemic policy analysis. This submission aligns with JSA's Terms of Reference (ToR) by focusing on **gendered education divides, occupational segregation, and intersectional policy solutions** for women and girls with disability.

WWDA's recommendations are grounded in Australia's obligations under the Convention on the Rights of Persons with Disabilities (CRPD)ⁱⁱⁱ, the *Working for Women: A Strategy for Gender Equality* (Priority Area 3)^{iv}, and *Australia's Disability Strategy 2021–2031* (Outcome 2: Economic Security)^v.

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2. Gendered Education Divides: Systemic Barriers for Women and Girls with Disability

2.1 Segregated Education

WWDA's 2020 [*Response to the Royal Commission's Education and Learning Issues Paper*](#)^{vi} highlights the systemic segregation of students with disability into "special" schools or units, which restricts exposure to mainstream vocational training and reinforces gendered occupational divides. This segregation contravenes CRPD Article 24 (inclusive education)^{vii} and entrenches low expectations, funnelling women with disability into undervalued industries like care work or cleaning.

2.2 Limited Career Pathways

This trajectory intersects with systemic barriers disproportionately impacting women and girls with intellectual disability. Inclusion Australia's analysis of "the polished pathway" demonstrates how segregated education settings funnel students into Australian Disability Enterprises (ADEs)^{viii}, where 70% of NDIS participants aged 25+ with intellectual disability in employment work in ADEs^{ix}. This structural segregation intersects with broader gendered labour market trends identified in the JSA Gender Economic Equality Study, which emphasises horizontal occupational segregation and the undervaluation of feminised work. ADEs perpetuate this inequity by offering sub-minimum wages^x (as low as \$3.00/hour)^{xi} and limited pathways to open employment, disproportionately affecting women with intellectual disability who face compounded barriers due to gendered assumptions about care roles and "low-skill" labour.

Inclusion Australia has conceptualised this as "the polished pathway" — segregated education → ADE — reflects systemic failures to address disability discrimination. Testimonies from workers in ADEs underscore how these settings entrench poverty cycles. Less than 1% of workers in ADE^{xii} transition to mainstream employment^{xiii}, locking women with disability into economic precarity. This systemic exclusion contravenes Australia's obligations under CRPD Article 27 (right to work)^{xiv} and entrenches gendered poverty, as women with disability face a double burden of occupational segregation and wage theft.

2.3 Restrictive Practices and Violence in Education

Women and girls with disability face disproportionate rates of physical restraint, seclusion, and bullying in educational settings, undermining workforce readiness^{xiv}. These practices violate CRPD Article 15 (freedom from torture)^{xv} and contribute to trauma that limits economic participation. WWDA has previously advocated for a comprehensive set of



educational reforms in the 2023 Submission to the [Review to Inform a Better and Fairer Education System^{xvi}](#). In consolidating these recommendations for the present JSA Study:

- Ban restrictive practices in schools and invest in disability-led trauma-informed training for educators.
- Address JSA’s focus on “education and training barriers” by mandating anti-bias curricula that challenge ableism and sexism.

3. Occupational Segregation: Gendered Industries and Exploitation

3.1 Overrepresentation in Low-Paid, Feminised Sectors

Women with disability are concentrated in industries with high rates of casualisation, such as aged care (72% female workforce) and cleaning^{xvii}. The *Supported Wage System (SWS)*^{xviii} still provides for people with disability to be paid a pro-rata percentage of the minimum wage for their industry according to their assessed capacity. WWDA has previously noted that in mainstream employment settings women with disabilities are less likely to be employed than men, and are more likely to be precariously employed or under-employed^{xix}.

Data from the National Disability Insurance Scheme (NDIS) further underscores the systemic barriers faced by people with disability in accessing equitable employment opportunities, particularly within mainstream settings. According to the NDIS Review Supporting Analysis, only 29% of NDIS participants aged over 25 are in paid employment, and of these, more than 77% work in Australian Disability Enterprises (ADEs)^{xx}. As we have stated previously, ADE’s typically pay well below award wages. This reliance on segregated employment settings reflects broader structural inequities that limit access to inclusive and meaningful work opportunities. The United Nations Special Rapporteur on contemporary forms of slavery has expressed concern about ADE’s in Australia and recommended that they be abolished^{xxi}.

While gender-disaggregated data is scarce within the NDIS reporting, broader labour market trends suggest that women with disability are disproportionately affected by these inequities due to intersecting barriers of ableism and sexism. Women with disability are more likely to be funnelled into low-paid and undervalued care and support roles, perpetuating cycles of economic disadvantage. The NDIS Review also highlights only 41% of people with disability aged 15–64 have income from wages or salary, compared to 73% of people without disability^{xxii}. This income disparity underscores the urgent need for systemic reforms to improve employment outcomes for people with disability, particularly women.





3.2 Vocational Education

Vocational education data further highlights systemic inequities in education pathways for people with disability, particularly women. As noted in WWDA's submission to the Draft National Care and Support Economy Strategy, vocational education enrolments reveal significant representation of students with disability in community services sector courses (compared to their non-disabled counterparts), with the majority being women with disability^{xxiii}.

This overrepresentation reflects systemic barriers that limit access to diverse career pathways for women with disability, perpetuating occupational segregation into undervalued and low-paid industries. The gendered nature of these enrolments underscores the need for targeted reforms to expand vocational education opportunities beyond traditionally feminised sectors. It also highlights the need to recognise women with disability as providers of care (both paid and unpaid) in care economy reforms, rather than solely as recipients.

3.3 Intersectional Data Gaps

Australia lacks disaggregated data on workforce participation by gender and disability, masking disparities. *Australia's Disability Strategy (2021–2031)*^{xxiv} fails to set gender-specific employment targets, while WGEA does not report disability pay gaps. The data captured by WGEA reporting currently does not sufficiently address intersectional pay gaps as it is unable to be disaggregated by gender, disability, and First Nations status. Likewise, there are few longitudinal studies examining the economic impacts of gendered disability discrimination.

The 2019 CRPD Committee Concluding Observations for Australia criticised the lack of “lack of nationally consistent measures for the collection and public reporting of disaggregated data on the full range of obligations contained in the Convention.”^{xxv} The Committee urged alignment with Articles 6 and 31 by prioritising intersectional data collection “especially with regard to women, children and Aboriginal and Torres Strait Islander persons with disabilities”^{xxvi}. Australia's systemic failure to collect intersectional data on workforce participation by gender and disability obscures critical disparities and contravenes obligations under the Convention on the Rights of Persons with Disabilities (CRPD)^{xxvii}. While





Article 31 of the CRPD explicitly mandates the collection of disaggregated data to assess implementation of rights, the absence of gender-specific employment targets in Australia's Disability Strategy (2021–2031) and the exclusion of disability pay gaps in Workplace Gender Equality Agency (WGEA) reporting demonstrate persistent non-compliance with Article 6 (women with disabilities) as a cross-cutting obligation.

4. Case Study: Systemic Exclusion from Higher Education Re-Produced by The Universities Accord

The JAS must address the systematic gender and disability exclusion that occurs during high level reviews in contingent sectors. For example, the 2024 Universities Accord Final Report^{xxviii} institutionalises systemic exclusion of people with disability from tertiary education, directly contradicting Australia's obligations under the *Disability Discrimination Act 1992 (DDA)* and the CRPD^{xxix[OBJ]}. WWDA echoes the concerns raised by Children and Young People with Disability Australia (CYDA) and the joint submission published by Australian Disability Clearinghouse on Education and Training (ADCET^{xxx}, which condemns the Accord's ableist framing and exclusion of people with "profound disability" from participation targets.

Key Failures:

- **Stagnant Participation Targets:** The Accord sets a static 11.6% participation rate for students with disability through 2035, while aiming for 24% for regional students^{xxxi}. This breaches CRPD Article 24 by normalising low expectations.
- **Medicalised Exclusion:** By defining "profound disability" as requiring "always help with self-care, mobility, and communication" (ABS criteria), the Accord erases achievements of disabled scholars and perpetuates harmful stereotypes^{xxxii}.
- **Omission of Universal Design for Learning (UDL):** Despite evidence that UDL improves outcomes for all students, the Accord ignores systemic reforms to teaching practices^{xxxiii}.

Impact on Women with Disability:

The consequence of this systemic exclusion is compounded for women with disabilities, with only 20% securing full-time employment compared to 42% of men with disabilities^{xxxiv}. The Universities Accord's failure to mandate inclusive curricula or Universal Design for Learning entrenches occupational segregation that is the focus of JAS study.





5. Policy Recommendations

5.1 Education and Skills System Reforms

1. **Legislate inclusive education reforms under the *Disability Standards for Education 2005* to phase out segregated schooling.**

This aligns with Recommendations 7.14 of the Disability Royal Commission (DRC) Final Report, which calls for the elimination of segregated education through the National School Reform Agreement^{xxxv}. The Australian Coalition for Inclusive Education (ACIE) Roadmap reinforces this, identifying legislative alignment with CRPD Article 24 as a foundational pillar to ensure all students access mainstream education^{xxxvi}. The Roadmap's 10-year outcomes framework prioritises systemic reforms to transition students from “special schools” to inclusive settings.

2. **Fund disability-led trauma-informed training for educators that challenge ableist and sexist stereotypes.**

The ACIE Roadmap^{xxxvii} highlights the need to invest in professional development in teaching settings as a key lever to dismantle stereotypes and cultivate inclusive practice.

3. **Address the “leaky pipeline” in post-training outcomes for women with disability through targeted funding for STEM and non-traditional vocational pathways.**

The ACIE Roadmap similarly advocates for targeted initiatives to increase participation for students with disability in higher education and vocational programs^{xxxviii}.

4. **Redirect dedicated funding from the National Skills Agreement to scholarships and workplace adjustments for women with disability entering male-dominated industries, addressing occupational segregation.**

Redirecting funds to scholarships would operationalise CRPD Article 6 (women with disability) and Article 27 (right to work)^{xxxix}.

5.2 Labour Market Interventions

5. Legislate equal pay in employment by phasing out subminimum wages in Australian Disability Enterprises by 2026, as mandated by CRPD Article 27^{xl} and recommended in WWDA's 2020 *Employment Issues Paper Response*^{xli}.
6. Adopt WWDA's 2020 recommendation to develop a National Disability Employment Strategy with gender-specific targets.





7. Expand the *Working for Women Strategy*^{xlii} to include measures for women with disability in male-dominated industries.

5.3 Strengthening Safeguards and Accountability

8. Implement WWDA's 2020 call for a national oversight mechanism to address workplace violence and exploitation.
9. Integrate CRPD compliance into JSA's Gender Framework to ensure intersectional analysis across labour market policies.
10. Mandate intersectional workforce reporting through amendments to the *Disability Standards for Education 2005*, requiring universities and vocational providers to disclose disability participation, retention, and post-study wage gaps by gender.
11. Mandate intersectional pay gap reporting by WGEA, disaggregated by gender, disability, First Nations and Culturally and Racially Marginalised (CARM) status.

6. Conclusion

To avoid the perpetuation of barriers evident in The Universities Accord, WWDA urges JSA to prioritise the experiences of women and girls with disability in its study. We are committed to continuing to work constructively with Government, Tertiary and Industry partners on human rights-based reform.

Yours sincerely,

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Chief Executive Officer

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