



16 May 2024

By email: AutismPolicy@dss.gov.au.

DCA submission in response to Draft National Autism Strategy

Dear Secretary, Department of Social Services, Ray Griggs

Thank you for the opportunity to provide comment on the Draft National Autism Strategy (the Strategy).

Diversity Council Australia (DCA) is the independent not-for-profit peak body leading diversity and inclusion in the workplace. We have over 1,300 member organisations, employing over 2 million Australians, representing almost 20% of the Australian workforce.

Given our focus on workplace inclusion and diversity, DCA can provide comment on the social and economic inclusion of Autistic people and the commitments outlined by the Department in these areas. We welcome the Australian government's engagement with the health and wellbeing of Autistic people across the country and fully support this Strategy's intent to protect, promote and realise their human rights.

A note on language:

DCA recognises that a diversity of terms is used to describe people's lived experience. We recognise and respect an individual's right to identify with terms that they feel most comfortable with. We also recognise the limitations of binary language. However, sometimes binary categories have very real effects on peoples' experiences and may be necessary to convey the gendered nature and dynamics of our society.

DCA recognises that language is socially constructed and constantly evolving and our intention is always to be inclusive and to be open to change.

Language relating to autism is a complex area. We embrace the suggestions provided by *Amaze*ⁱ including a mix of identity-first, person-first, strengths-based, positive and assertive language.

A note on intersectionality:

DCA notes and fully supports the Strategy's focus on intersectional (overlapping) disadvantage or discrimination experienced by Autistic people. We always recommend an intersectional approach when developing and implementing policy and programs. We define intersectionality as how some people experience compounded discrimination due to multiple marginalising and interlinked characteristics.ⁱⁱ An intersectional lens on the lived experience of the diversity of Autistic people who are women, culturally and racially marginalised, Aboriginal and/or Torres

Strait Islander people, people with disability, LGBTIQ+ and/or have other diverse characteristics, will add significant value to inform the development of this Strategy.

Comment:

1. Strategy Overview:

Firstly, DCA strongly supports the Strategy's overall approach to the use of language and the Neurodiversity Paradigm. At DCA we acknowledge and respect each person's right to describe themselves and/or talk about themselves in a way that feels most comfortable for them. We recognise there will be a diversity of terms used by people impacted by this Strategy. As previously mentioned, we refer to the suggestions made by *Amaze*ⁱⁱⁱ on the use of language.

DCA has conducted research and produced resources on centring the voices of people with lived experience^{iv} and strongly supports a paradigm that centres the lived experience of Autistic people.

We support the Strategy's **Vision:** *The National Autism Strategy's vision is for a safe, inclusive society. All Autistic people are able to fully participate in all aspects of life, in line with international human rights*, and **Goal:** *The goal of the Strategy is to improve life outcomes for all Autistic people.*

DCA also welcomes the Strategy's guiding principles, particularly those relating to partnership (co-design etc), self-determination and rights. We fully support a strengths-based and neurodiversity-affirming approach, and a rights-based approach in line with the United Nations Convention on the Rights of Persons with Disabilities.

In Australia, the government classifies *Autism Spectrum Disorder*^v as a developmental disorder and it is covered by *Australia's Disability Strategy 2021-2031*^{vi}. A key recommendation of this Strategy is to develop a person and family-centred National Autism Strategy, the focus of this Inquiry. But it is important to consider that not all people who are neurodivergent identify as having a disability. Within the scope of this submission, DCA's comments and recommendations **do not** assume people who identify as Autistic also identify as having a disability. When we refer to research, submissions and related material on disability and inclusion strategies, we do so because they are highly relevant to people with autism in the workplace.



2. Commitments – Social inclusion:

DCA supports all the commitments outlined under Social Inclusion in the Strategy:

- 1. Improve understanding of, and change attitudes towards, Autistic people across all of society, through:*
 - a. Greater public education and awareness including a better understanding of autism within workplaces, and with a focus on health, education and the criminal justice system.*
 - b. Increasing visibility and representation of Autistic people in the media, sports and the arts.*
 - c. Increasing accessible and sensory-friendly public and online spaces.*
 - d. Increasing the capability of advocates and advocacy organisations to challenge and reduce stigma of autism.*
- 2. Increase opportunities for social connections and peer support.*
- 3. Improve Australian Government service delivery, communication, and information to meet the needs of Autistic people.*
- 4. Ensure consideration of the needs of Autistic people in future amendments to or reviews of the Disability Discrimination Act 1992 (Cth) and associated disability standards.*
- 5. Improve the safety and welfare of Autistic people through the reduction of all forms of discrimination, violence, abuse, bullying, vilification and exploitation.*

Many Australians spend a great deal of time at work. The workplace is an ideal location for information and education to raise awareness and improve our understanding of autism. It is also a location providing opportunities for social connections and peer support.

Our member experience tells us that championing autism in the workplace can be approached in four steps, within the framework of DCA's *Change at Work* research^{vii}.

This evidence-based model guides organisations to more effectively achieve diversity and inclusion outcomes:

1. Diagnose the business need
2. Design diversity and inclusion change that works
3. Engage and enable staff to lead the change
4. Embed and evaluate the change to make it stick.

For example, one of our member organisations conducted research to gather data and insights that identified barriers in the workplace for neurodivergent staff. Working with their employee network group they developed an *Autism Workplace Champion Initiative* to embed 'neuro-inclusion' into their culture through upskilling the entire workforce, communications, events, and training. As a result, they have seen real change: a significant increase in disclosures and membership in their closed networking group and an increase in confidence in teaming with and leading neurodivergent colleagues.

All of these strategies contribute to reducing the stigma of autism.



Practical measures can be implemented to make work environments more accessible and sensory-friendly. DCA recommends to our members they develop a workplace adjustments policy and process which includes physical modifications, flexible work arrangements, assistive technologies and changes to work processes^{viii}.

Information and education to raise awareness and challenge myths around autism, combined with practical measures to improve accessibility, all contribute towards a work environment that feels safe, welcoming and free from discrimination and violence. In our latest *Inclusion at Work*^{ix} research (2024) DCA found that exclusion – experiences of discrimination and/or harassment – is higher for a number of marginalised groups, including workers with disability (42%), compared to previous years.

This research also found that everyday exclusion – being ignored at work, others making assumptions about ability based on identity – has increased. For example, 39%^x reported that sometimes, often or always people made incorrect assumptions about their abilities because of their age, culture/ethnicity, *disability*, gender, Indigenous background or sexual orientation.

This data points to the considerable work that remains to be done to make workplaces inclusive for the most marginalised workers.

3. Commitments – Economic inclusion:

DCA supports all the commitments outlined under Economic Inclusion in the Strategy:

6. Increase meaningful employment opportunities (including business ownership, self-employment, entrepreneurship and social enterprise) for Autistic people.

7. Support employers to hire and retain Autistic employees through improving the accessibility of recruitment processes and fostering workplace environments that are safe and inclusive for all Autistic people.

8. Improve the supports and services available to Autistic people to ensure they have choice and control over their education and careers.

9. Increase representation of Autistic people in senior and board positions to promote people as visible role models.

10. Improve inclusive practices and the quality and accessibility of advocacy resources for Autistic students across all education settings, and their families, carers and support networks.

11. Build on commitment 5 Improve the safety and welfare of Autistic people through the reduction of all forms of discrimination, violence, abuse, bullying, vilification and exploitation to specifically focus on Autistic students in all levels of education.

It is of great concern to DCA that the Strategy notes that Autistic people are 8 times more likely to be unemployed than the general population^{xi}. Equally concerning is that the unemployment rate of Autistic people is three times that of people with other disabilities.

Our *Inclusive Recruitment at Work*^{xii} report also found that there are approximately 3.3 million Australians of working age (16% of our total working-age population) who are potential job seekers who want to work. However they are overlooked and underleveraged by employers. All



are much more likely to belong to a marginalised group: Aboriginal and/or Torres Strait Islander people, culturally and racially marginalised people, carers, *people with disability*, people from lower socio-economic backgrounds and with lower formal education, transgender people, people over 55 and people under 25.

Last year, DCA provided a submission to the Department's options paper on *Establishing a Disability Employment Centre of Excellence October 2023*^{xiii} acknowledging the many systemic barriers people with disability face obtaining and retaining employment. These barriers exist for people with non-apparent disabilities^{xiv} as well as those with apparent disabilities. Inclusive strategies should be in place from the outset, before someone is hired, ie. at recruitment. For example, a truly inclusive hiring process should enable candidates to self-disclose their preferred accommodations for interviews – interpreter, receiving questions in advance, communication preferences etc.

Excellent advice was made available to our members courtesy of the CEO of *Amaze*, Jim Mullan^{xv}. Following an event hosted by DCA on *Attracting, Retaining and Progressing Neurodivergent Talent*,^{xvi} he summarised ten guiding principles^{xvii} for recruiting from the neurodivergent community:

1. Act with intention
2. Go to where the candidates are
3. Be specific
4. Use plain English
5. Paint a picture
6. If you want answers, provide the questions
7. Remove metaphors, avoid misunderstandings
8. Welcome aboard
9. Adjustments are not 'set' and 'forget'
10. There are few epiphanies, this is about constancy of purpose.

DCA also worked with the I CAN Network^{xviii} – an organisation that empowers people on the Autism spectrum to better understand neurodiversity. CEO, Chris Varney, believes that the main challenge for any employer in successful recruiting and progressing neurodivergent staff is having a detailed forward plan and integrating the necessary processes that deliberately match neurodivergent employees' talents to opportunities within their organisation^{xix}.

In terms of senior leadership and roles on Boards, it is very concerning that currently the available data suggests that there are no people with disabilities on ASX300 boards in Australia^{xx}. Increasing the representation of people with disabilities, including Autistic people, in senior leadership and board roles is critical in providing role models in our workplaces.

DCA has been actively involved in research and advocacy to support marginalised people progress in their careers and take up senior leadership roles and Board positions. We recently provided a submission^{xxi}, in partnership with University of Sydney Business School and University of Technology Sydney Business School/Jumbanna Institute for Indigenous Education and Research, calling for greater diversity on Boards. We fully support initiatives conducted by the Disability Leadership Institute^{xxii} and the Australian Disability Network to increase the representation of people with disability in executive and board leadership positions^{xxiii}.



4. Recommendation:

DCA recommends:

- the government support this draft National Autism Strategy and provide appropriate resourcing to ensure implementation of commitments
- the government resources a monitoring and evaluation component to this Strategy to ensure data is collected on the impacts of the commitments.

5. DCA research and resources relevant to this discussion:

Inclusive workplaces:

- [Inclusion@Work Index 2023-2024](#)
- [The Case for Inclusion@Work - Diversity Council Australia \(dca.org.au\)](#)
- [Inclusive Recruitment Tools - Diversity Council Australia \(dca.org.au\)](#)
- [Inclusive Recruitment At Work - Diversity Council Australia \(dca.org.au\)](#)
- [The State of Flex in the Australian Workforce - Diversity Council \(dca.org.au\)](#)

DCA has also made a number of relevant submissions:

- [Joint submission on ASX Corporate Governance Council - \(dca.org.au\)](#)
- [Employment White Paper Response - Diversity Council Australia \(dca.org.au\)](#)
- [Work and Care Inquiry Submission - Diversity Council Australia](#)
- [Response to Establishing a Disability Employment Centre of Excellence](#)

Please feel free to contact myself or Jacqueline Braw, Senior Advocacy and Government Relations Manager, on jacqueline@dca.org.au should you require any further information about this matter.

Yours sincerely



Lisa Annese
Chief Executive Office

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- ⁱ Amaze – www.amaze.org.au [Our language - Amaze](#)
- ⁱⁱ Diversity Council Australia (V. Mapedzahama, F. Laffernis, A. Barhoum, and J. O'Leary). *Culturally and Racially Marginalised Women in Leadership: A framework for (intersectional) organisational action*, Diversity Council Australia, 2023. [CARM women in leadership - Diversity Council Australia \(dca.org.au\)](#)
- ⁱⁱⁱ Amaze – www.amaze.org.au [Our language - Amaze](#)
- ^{iv} Diversity Council Australia (Mapedzahama, V., Ojinnaka, A., Deo, S. and O'Leary, J.) *Centring Marginalised Voices at Work: Lessons from DCA's Culturally and Racially Marginalised (CARM) Women in Leadership Research*, Sydney, Diversity Council Australia, 2024. [Centring Marginalised Voices at Work - Diversity Council Australia \(dca.org.au\)](#); [CARM women in leadership - Diversity Council Australia \(dca.org.au\)](#); Diversity Council Australia (V. Mapedzahama, F. Laffernis, A. Barhoum, and J. O'Leary). *Culturally and Racially Marginalised Women in Leadership: A framework for (intersectional) organisational action*, Diversity Council Australia, 2023. [CARM women in leadership - Diversity Council Australia \(dca.org.au\)](#)
- ^v <https://www.aihw.gov.au/reports/disability/autism-in-australia/contents/autism>
- ^{vi} Commonwealth of Australia (Department of Social Services) 2021 Australia's Disability Strategy 2021-2031. <https://www.disabilitygateway.gov.au/sites/default/files/documents/2021-11/1786-australias-disability.pdf>
- ^{vii} Diversity Council Australia (Russell, G., O'Leary, J. and Rozsnyoi, J.) *Change At Work: Designing Diversity and Inclusion Differently to Achieve Organisational Change*, Diversity Council Australia, 2019. [Change At Work - Diversity Council Australia \(dca.org.au\)](#)
- ^{viii} [Disability and accessibility - Leading Practice - Diversity Council \(dca.org.au\)](#)
- ^{ix} Diversity Council Australia (R. D'Almada-Remedios), *Inclusion@Work Index 2023–2024: Mapping the State of Inclusion in the Australian Workforce Synopsis Report*, Diversity Council Australia, 2024 [Inclusion@Work Index 2023-2024 - Diversity Council Australia \(dca.org.au\)](#)
- ^x Diversity Council Australia (R. D'Almada-Remedios), *Inclusion@Work Index 2023–2024: Mapping the State of Inclusion in the Australian Workforce Synopsis Report*, Diversity Council Australia, 2024 [Inclusion@Work Index 2023-2024 - Diversity Council Australia \(dca.org.au\)](#)
- ^{xi} Commonwealth of Australia (Department of Social Services) 2024 Draft National Autism Strategy. [draft-national-autism-strategy.pdf](#)
- ^{xii} Diversity Council Australia (R. D'Almada-Remedios, A. Kaabel, and J. O'Leary), *Inclusive Recruitment: How to Tap into Australia's Overlooked and Underleveraged Talent*, Sydney, Diversity Council Australia, 2022 [Inclusive Recruitment At Work - Diversity Council Australia \(dca.org.au\)](#)
- ^{xiii} [DCA Disability-Employment-Centre November-2023.pdf](#)
- ^{xiv} [What is a Non-Apparent Disability? - Inclusively](#)
- ^{xv} [Recruiting Neurodivergent Talent - Diversity Council Australia \(dca.org.au\)](#)
- ^{xvi} [Recruiting neurodivergent talent - Diversity Council Australia \(dca.org.au\)](#)
- ^{xvii} [Recruiting Neurodivergent Talent - Diversity Council Australia \(dca.org.au\)](#)
- ^{xviii} [I CAN Network – I CAN Network is Australia's largest provider of Autistic-led group mentoring programs, training and consultancy.](#)
- ^{xix} [Neurodiversity: different not lesser than - Diversity Council Australia \(dca.org.au\)](#)
- ^{xx} [2024 Board Diversity Index.pdf \(watermarksearch.com.au\)](#)
- ^{xxi} [Joint submission on ASX Corporate Governance Council - \(dca.org.au\)](#)
- ^{xxii} [Disability Leadership Institute](#)
- ^{xxiii} <https://australiandisabilitynetwork.org.au/how-we-can-help-you/increasing-board-and-executive-representation/#:~:text=Inclusion%2C%20diversity%20and%20equity%20cannot,decisions%20with%20true%20market%20representation.>