

Ai GROUP

SUBMISSION

Willing to Work: A National Inquiry into the Employment Discrimination against Older Australians and Australians with a Disability

**Australian Human Rights Commission**

**December 2015**

**About Australian Industry Group**

The Australian Industry Group (Ai Group) is a peak industry association in Australia which along with its affiliates represents the interests of more than 60,000 businesses in an expanding range of sectors including: manufacturing, engineering, construction, automotive, food, transport, information technology, telecommunications, call centres, labour hire, printing, defence, mining equipment and supplies, airlines, health and other industries. The businesses which we represent employ more than one million people. Ai Group members operate small, medium and large businesses across a range of industries. Ai Group is closely affiliated with many other employer groups and directly manages a number of those organisations.

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**Introduction**

Ai Group welcomes the invitation to make submissions to the Australian Human Rights Commission’s (**AHRC**)inquiry, Willing to Work: National Inquiry into Employment Discrimination against Older Australians and Australians with Disability (**Inquiry**).

Ai Group is a member of the Employer Reference Panel for the Inquiry. We jointly convened with the AHRC three consultation meetings with Ai Group members to seek their views on employment discrimination against older Australians and Australians with a disability. The consultation meetings provided insight into the barriers to employment of older workers and workers with a disability from both an employer and employee perspective. The consultation meetings also revealed the best practice initiatives being undertaken by some employers to encourage employment of older workers and workers with a disability.

This submission notes the views expressed by Ai Group members who participated in the consultation meetings and other feedback provided by Ai Group members who were unable to attend the consultation meetings.

In drafting this submission, Ai Group has considered the two issues papers released by the AHRC:

1. Employment Discrimination against older Australians; and
2. Employment discrimination against Australians with disability.

**Ai Group strongly supports the employment of older Australians and Australians with a disability**

Ai Group recognises the importance of increasing the participation of older workers and workers with a disability in employment. The benefits of increased employment participation for older workers and workers with a disability extend to not only the individual workers involved, but also employers and the national economy.

The Australian Government’s 2015 Intergenerational Report noted that:

* *“The number of Australians aged 65 and over is projected to more than double by 2054-55, with 1 in 1,000 people projected to be aged over 100. In 1975, this was 1 in 10,000.*
* *Australians will live longer and continue to have one of the longest life expectancies in the world. In 2054-55, life expectancy at birth is projected to be 95.1 years for men and 96.6 years for women, compared with 91.5 and 93.6 years today.*
* *The average annual rate of growth in the population is projected to be 1.3 per cent, compared with 1.4 per cent over the past 40 years.*
* *By 2054-55, the participation rate for people aged over 15 years is projected to fall to 62.4 per cent, compared to 64.6 per cent in 2014-15.*
* *The number of people aged 15 to 64 for every person aged 65 and over has fallen from 7.3 people in 1975 to an estimated 4.5 people today. By 2054-55, this is projected to nearly halve again to 2.7 people.*”[[1]](#footnote-2)

It is obvious that the workforce participation rates of older persons and persons with a disability must increase if Australia is to remain globally competitive. As the average age of an Australian increases, it is necessary that the employers embrace underutilised sources of labour and search for new sources of labour. This involves breaking down of barriers which are preventing the employment (and increased participation) of older workers and workers with a disability in the workforce.

Feedback from Ai Group member companies reveals a genuine desire to increase the participation of older workers and workers with a disability at their workplace but they feel constrained by particular barriers. Some employers have devised innovative ways to do this, with great benefits to their businesses.

It is important that Governments considering mechanisms to increase the workforce participation of older workers and workers with a disability ensure that any new approaches adopted do not have the unintended consequence of creating new barriers to employment. For example, increasing employer obligations under anti-discrimination law or developing further regulation, such as mandating quotas or requiring employers to report to the Government against criteria about the employment of older workers and workers with a disability, is not the answer. These approaches would rather cause employers to be apprehensive about increasing the employment of older workers and/or workers with a disability in their workplaces for fear of falling foul of the law, one way or another.

It is important that the AHRC continues to consult with employers about the recommendations which may flow from this inquiry.

**The role of employers**

Employers have an important role to play in increasing the workforce participation of older workers and workers with a disability.

Employers, by implementing inclusive workplace policies, procedures and practices for older workers and workers with a disability, can assist to break down the cultural barriers which have limited the employment opportunities of such workers in the past.

Many employers have done just this. Consultations with our members have revealed some ‘best practice’ examples include allowing older workers or workers with a disability who are unable to meet the physical demands of a job to perform less physical demanding roles. For example, an Ai Group member reported that the company had progressively reducing the physical duties of a worker with multiple sclerosis and made available the option to perform part-time work. This approach may require an employer to consider job redesign or job transition for the employee.

Ai Group members suggested that greater access to resources (including the promotion of those resources) to both large and smaller employers to assist with the cost of training resulting from job re-design and job transition would be useful. Emphasis should also be placed on ‘transitional jobs’ for those workers considering retirement and ‘job matching’ for workers with a disability.

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| **Case Study – Best practice in employment of persons with a disability** |
| **Ai Group member promoting employment of persons with autism**  SAP has announced a global program (which includes its Australian operations) to employ people with autism as software testers, programmers and data quality assurance specialists. The company has set a target of one percent of its global workforce being autistic by 2020.  According to SAP “*Autistic employees can offer competitive advantages … while helping the individual’s secure meaningful employment*.”  We refer the AHRC SAP’s media release about the program: <http://news.sap.com/autism-and-aspergers-are-assets-not-disabilities-at-sap/> |

Business groups such as Ai Group also have an important role to play in promoting the benefits of employing older workers and workers with a disability among employers.

Ai Group has developed the *Investing in Experience* toolkit in partnership with members of the Australian Government’s Consultative Forum on Mature Age Participation. The toolkit provides a practical guide to employing and managing mature aged workers.

Ai Group is interested in partnering with the AHRC to develop and promote further educative resources to assist employers with employing and managing older workers and workers with a disability.

We also would be supportive of the promotion of ‘brand champions’ to advocate in favour of the employment of older persons and persons with a disability. For example, an initiative similar to the ‘Male Champions of Change’ who lead by example to eliminate discrimination against women in the workplace, would be worthwhile.

**Challenges faced by businesses in employing older workers and workers with a disability**

Despite the best intentions of businesses to employ, and engage with older workers and workers with a disability, there are a number of challenges that they face.

**Workplace relations challenges**

The current workplace relations framework presents significant barriers to the employment, and continuing employment, of older workers and workers with a disability. Many of the barriers can be categorised into three general areas:

* Anti-discrimination laws and the general protections;
* Industrial awards and enterprise agreements
* Transfer of business laws

Ai Group’s submission to the Productivity Commission’s inquiry into the workplace relations framework identifies a number of Ai Group’s concerns with Australia’s workplace relations system. We refer the AHRC to our submissions to the Productivity Commission’s inquiry:

* [Ai Group Submission to the PC Inquiry into Workplace Relations, 16 March 2015](file://\\sydfs1\department\AiGROUP%20NATIONAL\NATIONAL%20WORKPLACE%20RELATIONS\SUBMISSIONS\2015\•http:\www.aigroup.com.au\portal\binary\com.epicentric.contentmanagement.servlet.ContentDeliveryServlet\LIVE_CONTENT\Policy%20and%20Representation\Submissions\Workplace%20Relations\2015\PC%20Ai%20Group%20workplace%20release%20Final.pdf).
* [Ai Group Submission: PC Inquiry into WR Framework - Response to draft report.](http://www.aigroup.com.au/portal/binary/com.epicentric.contentmanagement.servlet.ContentDeliveryServlet/LIVE_CONTENT/Policy%2520and%2520Representation/Submissions/Workplace%2520Relations/2015/PC_Review_of_WR_Framework_September_2015_Final.pdf)

**Anti-discrimination laws and the general protections**

The multiplicity of laws (both Federal and State) dealing with discrimination specifically, compounded by the general protections in the *Fair Work Act 2009* (Cth) (**FW Act**), have resulted in a genuine concern amongst employers about these laws. The complexity of the relationship between these laws is also very daunting for an employer to understand. These factors have resulted in employers being reluctant to employ older workers or workers with a disability for fear of breaching these laws. The following 12 laws are relevant to age and disability discrimination:

* *Age Discrimination Act 2004* (Cth)
* *Australian Human Rights Commission Act 1986* (Cth)
* *Disability Discrimination Act 1992* (Cth)
* *Fair Work Act 2009* (Cth)
* *Discrimination Act 1991* (ACT)
* *Anti-Discrimination Act 1977* (NSW)
* *Anti-Discrimination Act 1996* (NT)
* *Anti-Discrimination Act 1991* (QLD)
* *Equal Opportunity Act 1984* (SA)
* *Anti-Discrimination Act 1998* (TAS)
* *Equal Opportunity Act 2010* (VIC)
* *Equal Opportunity Act 1984* (WA)

**Industrial awards and enterprise agreements**

Many employers have reported frustration about the inflexibility inherent within industrial awards and many enterprise agreements. These inflexibilities make it very difficult for employers to implement alternative working arrangements for older workers and workers with a disability who desire (or require) more flexible working arrangements

The FW Act contains a number of provisions which purport to promote flexible working for employees, including the ability for an employer and employee to enter into an Individual Flexibility Arrangement (IFAs). However it is our experience that the flexibility intended by IFAs has not been realised to date. Since the introduction of IFAs, unions during enterprise bargaining negotiations have endeavoured to negotiate highly inflexible ‘Flexibility Terms’ in agreements which prevent any meaningful flexibility being achieved.

This issue was identified by the 2012 Fair Work Act Review which recommended that a change be made to the FW Act requiring flexibility terms in enterprise agreements to provide, as a minimum, that individual flexibility arrangements be able to address:

* When work is performed;
* Overtime rates;
* Penalty rates;
* Allowances; and
* Leave loading.

Ai Group has advocated that ‘leave’ more generally should be added to the above list.

The Fair Work Act Review’s recommendation was originally incorporated into the *Fair Work Amendment Bill 2014* but was later removed during the Senate’s consideration of the Bill. The recommendation now forms part of a newly introduced Bill, the *Fair Work Amendment (Remaining 2014 Measures) Bill 2015.* Ai Group strongly supports this Bill.

In addition to addressing the framework for IFAs, there are a number of other problems that need to be addressed.

Employers have reported that the consultation requirements in industrial awards and enterprise agreements regarding changes to rosters or working hours constrain (or at the very least add an additional layer of red tape to) an employer’s ability to offer flexible working arrangements to employees who request them.

Furthermore, some enterprise agreements contain provisions which limit the engagement of more flexible labour such as casuals, labour hire, independent contractors, fixed-term, fixed-project and part-time employment. Employers and employees value the flexibility that these forms of labour provide. Many employees cannot, or do not want to, work full-time. These alternate forms of labour are an essential part of the of labour force mix, but have often been opposed by unions. Clauses in enterprise agreements which limit or prevent the engagement of alternative forms of labour must be outlawed.

The ACTU has commenced proceedings in the Fair Work Commission (**FWC**) to impose further restrictions on casual and part-time employment. The FWC’s Casual and Part-Time Employment Case includes an application by the ACTU to insert the following provisions into awards:

* A provision which would force employers to employ casual employees as permanent employees if requested by the casual employee after 6 months of regular employment;
* A provision which would prevent the employment of any more casual or part-time employees unless additional hours have been offered to existing employees and refused by those employees; and
* A provision which would require that casual employees and part-time employees be engaged for a minimum of four hours per day or shift.

Ai Group is strongly opposing the ACTU’s application.

The unions’ opposition to forms of engagement that provide employees and employers with greater flexibility, is not conducive to modern workplace practices or the ageing workforce.

Some industrial awards contain obvious limitations upon flexibility. For example:

* The *Joinery and Building Trades Award 2010* contains a minimum engagement period for casual employees of 7.6 hours per day or shift.
* The *Road Transport (Long Distance Award) 2010* does not provide for part-time employment.

Award restrictions like these operate to exclude the employment of older workers who often wish to work reduced hours or slowly transition into retirement as opposed to immediately exiting the workforce.

**Transfer of business**

The FW Act contains provisions which regulate the employment conditions of employees affected by a transfer of business, i.e. when businesses restructure, outsource or insource, merge or are acquired.

It is essential that businesses remain agile and flexible so as to remain competitive in global and local markets. A key part of this is the ability to quickly restructure to take advantage of new markets and opportunities, to adjust during market downturns, to merge with other businesses, and to outsource where other businesses can perform functions more efficiently.

Unfortunately, job losses can occur when businesses undertake any of these processes. In some cases, an acquirer of a businesses or a business undertaking ‘outsourced’ work is interested in employing the employees of the former business or client. These workers are known as the ‘transferring employees’. These businesses, despite their good intentions, are often deterred from employing the transferring employees because of the ‘transfer of business laws’ in the FW Act. The ‘transfer of business laws’ deem that the industrial instruments that covered the transferring employees with the former employer will cover the employment of the employees with the new employer, and in many circumstances any other employees of the new employer performing the same or similar work as the transferring employees. It is not uncommon for the industrial instruments covering the transferring employees to be incompatible with the terms and conditions offered by the new employer. This acts as a significant deterrent to the ongoing employment of employees affected by a transfer of business.

There is a great deal of restructuring going on in industries with a high proportion of mature aged workers (e.g. the automotive industry). The transfer of business laws negatively impact many older workers.

**Other workplace relations issues**

We note the issues papers refers to the ‘Right to Request’ flexible working arrangements under section 65 of the FW Act, and particularly that the *right* enables an employer to reasonably refuse a request without any opportunity for the matter to be arbitrated by the FWC.

Ai Group has consistently opposed calls by parties to change the nature of the ‘Right to Request’ to force an employer to accept an employee’s request for flexible work arrangements. The provisions were designed to facilitate discussions between employers and employees; not to impose outcomes on employers.

**Workers compensation challenges**

Employers have referred to the challenges presented by workers’ compensation laws when employing older workers and workers with a disability. Our consultations with employers revealed genuine concern about workers’ compensation claims arising from workers as they age and become less mobile. The same can be said for workers who possess a disability and the propensity for work to aggravate the disability.

The approach by some employers of progressively reducing the physical tasks of older workers as they become less mobile (as identified earlier in this submission) may assist to reduce the risk of older workers becoming injured at work.

Research has identified that “*back pain, arthritis, mental illness, type 2 diabetes and cardiovascular disease are related to lower labour force participation … [and] with an ageing population there is a risk that chronic conditions will further limit labour force capacity*”.[[2]](#footnote-3) This research “*estimated that Australia would experience an increase of 112,000 [productive life years] lost due to illness in older Australian workers between 2010 and 2030, with most rapid growth in men aged 55-59 years and women aged 60-64 years. The impact of this lost labour force participation was estimated to be $37.79 billion in 2010, increasing to $63.73 billion in 2030*”.[[3]](#footnote-4) The research concludes that premature retirement due to chronic disease presents a significant cost to the Australian economy.

The relationship between workers compensation and the employment of older workers is being considered by the GAP Taskforce on Productive Ageing. Ai Group is a member of the Taskforce, whose membership also includes senior government, business and academia representatives, and it is funded by the NSW Department of Family and Community Services and the Federal Department of Social Services. The purpose of the Taskforce is to discuss ageing and employment issues and develop sustainable policy approaches to improve national productivity and economic outcomes for workers aged 45 and over.

**Cost challenges**

There are number of cost challenges which businesses and employers may need to navigate before employing, or continuing to employ, a worker who possesses a physical disability. For example, the need to make modifications to the physical environment at the workplace, or to the work itself, to accommodate the physical challenges experienced by a person with a disability or an older person who possesses physical ailments, can be costly.

The Federal Government’s Employment Assistance Fund provides assistance to employers by reimbursing the cost of work-related modifications and services provided to people with a disability or mental health condition who are commencing work with the employer or are currently working with that employer. This assistance however does not extend to those workers (or persons) who may have an ailment that places limitations on their ability to work, say for example because of age that is not diagnosed as a disability. Furthermore, feedback from employers during our consultation revealed that the existence of the fund is not widely known among employers.

The *Disability Discrimination Act 1992* (Cth) contains an exception if adjustments to the workplace would cause unjustifiable hardship. It is very important that this exception remains to protect those employers who are not able to make reasonable adjustments or access Government funding to assist with the making of any necessary adjustments.

**Productivity challenges**

During our consultation process, some employers indicated that some workers who possessed a disability were less productive than those without a disability, for example workers with an intellectual disability.

The Supported Wage System is intended to address these challenges by enabling the payment of a productivity-based or pro-rata wage. The payment of such a wage is determined via a workplace productivity assessment carried out by independent Supported Wage System assessors. Access to the Supported Wage System is limited to those jobs covered by an industrial instrument or legislative provision which permits employment under the Supported Wage System.

A new productivity wage tool is being developed by the Australian Government to determine productivity based wages under the Supported Wage System. It is essential that any new approaches do not have the effect of discouraging the employment of persons with a disability.

Furthermore, the limited coverage of the Supported Wage System means that there is little assistance to address ‘productivity challenges’ experienced by employers and persons who do not meet the eligibility criteria of the system. While an expansion of the system may not be the most appropriate way to assist employers overcome these challenges, other forms of assistance, including in the form of education and awareness building, may be needed to assist employers with job design and recruitment pathways which may enable a person with a disability to contribute to the workplace at ‘full productivity’.

The current disability employment system is under review by the Disability Employment Taskforce. The role of the Taskforce is to provide options to the Australian Government for a new Disability Employment Framework that would improve employment outcomes for people with disability. The most recent discussion paper issued by the Taskforce refers to international approaches to increasing workforce participation of persons with a disability.[[4]](#footnote-5) The discussion paper notes that:

*“International evidence demonstrates that countries which have high employment rates of people with disability have generous supports in place for employers. For instance, Sweden and Denmark, which rank first and sixth respectively in the ranking of 29 OECD countries, have wage subsidies which range from 50-80 per cent of the individual’s wage cost. Switzerland, which ranks fifth, has a strong focus on early intervention; working with employers on job retention and providing high levels of ongoing support.”[[5]](#footnote-6)*

We urge the AHRC to consider the evidence collated by the Taskforce and referred to in the discussion paper when making its recommendations with respect to this Inquiry.

**Demographic challenges**

Ai Group has a significant membership of employers in the manufacturing industry. The Manufacturing Industry Outlook 2015 indicates that 40.6 per cent of manufacturing workers are aged between 45-64 years, compared with 35.6 per cent across all industries. This figure suggests that close to half of all manufacturing workers are considered to be ‘older workers’.

Some Ai Group member companies in the manufacturing industry have reported much higher average ages of employees than the industry average, for example, one member indicated that a particular worksite had a workforce with an average age greater than 60.

This presents a multifaceted challenge for employers with respect to:

* The retention of employees as they get older;
* Training older employees in new skills; and
* Retaining existing skills and knowledge within a business as older persons leave the workforce.

In light of the aging population it is important that older workers remain in employment where possible, whether this is with an existing employer or a new employer. This requires an ongoing commitment by employers and older workers to training and education so that their skills and knowledge remain relevant as technology changes the way work is done.

Training and education should not be limited to technical skills, but also should incorporate, managerial and leadership skills. This becomes very important for skills and knowledge retention in a business if an older worker is no longer, because of age, unable to perform physical work.

As the automotive sector in Australia winds down, many workers (a majority of them ‘older workers’) will be faced with unemployment. The Productivity Commission predicts that 40,000 people will lose their jobs as a result of the end of car making in Australia.[[6]](#footnote-7) This comprises 80% of workers in the direct auto assembly workforce plus 40% of workers in the automotive components supply chain (including components for vehicles other than passenger cars) will be retrenched.[[7]](#footnote-8)

The Australian Government’s Review of the South Australian and Victorian Economies acknowledged that the wind-down of the car manufacturing industry in Australia would result in unemployment of some workers and that older workers would face difficulties in finding new employment:

“*The skills and capabilities of the more highly qualified workers affected by the closures may be transferable to other sectors. Recognition of prior learning will assist with this. However, some workers may need to undertake training to access alternative employment. For example, a proportion of the workforce has low language, literacy and numeracy skills or have skills targeted specifically at manufacturing processing – although this differs between regions. Older workers might also face difficulties.*

*There are risks in the short term that displaced workers will suffer loss of income and incur financial and non-financial costs in finding another job, retraining and perhaps relocating. Redeployment assistance can help these people with their immediate needs. Retraining and relocation assistance can help them move to jobs in other sectors of the economy.*”[[8]](#footnote-9)

The Australian Government has established the Automotive Industry Structural Adjustment Programme to assist workers who have been made redundant from an eligible company in the automotive manufacturing industry (including component suppliers) to find a new job. The program connects job seekers with employers and is delivered by a network of jobactive providers. An element of the program is to assist workers to access training in those skills sought by local employers and to provide funding for work related items, including professional services, relevant training and support after a new job is found. We refer the AHRC to the Australian Government Factsheet, ‘[*Help for workers who have recently lost their jobs in the automotive manufacturing industry*](https://docs.employment.gov.au/system/files/doc/other/help_for_workers_who_have_recently_lost_their_jobs_in_the_automotive_manufacturing_industry_0.pdf)’.

**Recommendations**

In conclusion, Ai Group recommends the following to improve the workforce participation of persons of mature age and persons with disability:

* The removal of regulatory barriers in Australia’s workplace relations framework that inhibit the employment of older workers and persons with disability;
* Improving accessibility to the Employment Assistance Fund (EAF) and greater promotion of the fund being available to employers;
* Active promotion of employers leading the way in the areas of recruitment and job redesign for employees with a disability or of mature age as examples of modern workplaces adapting to diversity in Australian society;
* Engaging with business about the organisational and financial benefits of employing mature aged persons or persons with disability; for instance a company’s market positioning to better reflect their customer base;
* A strong community education campaign about the talent and capabilities of mature aged persons and persons with disability so as to overcome any damaging stereotypes or prejudice that may be held in the community and manifest in the workplace; and
* Developing and promoting effective strategies and tools for recruitment agencies to consider a diverse talent pool of potential employees.

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1. Australian Government, 2015 Intergenerational Report, chapter 1, page 1. [↑](#footnote-ref-2)
2. Schofield D, Shrestha R, Cunich M, Tanton R, Kelly S, L Veerman, Passey M. Projections of Productive Life Years (PLYs) lost due to chronic conditions in Australians aged 45-64 years between 2010 and 2030: projections from a microsimulation model. MJA. Accepted 31 July 2015. [↑](#footnote-ref-3)
3. Ibid. [↑](#footnote-ref-4)
4. Australian Government, National Disability Employment Framework - Discussion Paper, November 2015, <https://engage.dss.gov.au/wp-content/uploads/2015/11/disability_employment_framework_discussion_paper_-_final.pdf>. [↑](#footnote-ref-5)
5. Ibid. [↑](#footnote-ref-6)
6. Australian Government, Productivity Commission Inquiry Report: Australia’s Automotive Manufacturing Industry, 31 March 2014, <http://www.pc.gov.au/inquiries/completed/automotive/report/automotive.pdf>. [↑](#footnote-ref-7)
7. Ibid. [↑](#footnote-ref-8)
8. Australian Government, Growing Opportunities: South Australia and Victorian Comparative Advantage: of South Australian and Victorian Economies, April 2014. <http://www.industry.gov.au/AboutUs/CorporatePublications/ReviewofSouthAustralianandVictorianEconomies/Pages/default.aspx> [↑](#footnote-ref-9)