**Disability Employment Framework Submission** –

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DVJS has been assisting job seekers with disabilities since 1993 placing them into open award-based employment. We have placed all types of disabled people into various industries from the basic repetitive blue collar position to executive professional...our job seekers are diverse in their skill set as they are their chosen field of employment.

Throughout my 22 years at DVJS I have been very fortunate to witness many success stories of how our program (now DES-ESS) has completely changed people’s lives for the better...there is no doubt that social inclusion at the workplace has significant positive impact upon a person’s well being, in particular those disadvantaged by disability.

Times have definitely changed as industries such as manufacturing are struggling to be competitive in a global market whilst others such as health and hospitality have grown. As a result, service providers and job seekers have had to adapt to meet the changing markets as jobs that were there in the past are no more.

DVJS has been very successful as it has been able to meet needs of employers and job seekers and prides itself on its high levels of service in all areas from case management to post placement support. However, during my 22 years I have never experienced such a difficult program to manage as our innovation, resources & viability have been virtually sapped dry due to over governance & rigidity by Government Departments. Compliance & new job outcomes has become our priority due to zero tolerance of non-conformance rather than people.

***Guidelines***

The Guidelines are confusing & there is no flexibility in the guidelines to consider human error or change in mind. For example, a vision impaired Participant in Ongoing Support was ‘let-go’ from their employer and following guidelines, we had to exit the Participant. A month later, the employer contacted DVJS to see if the Participant was available again as they had changed their mind and recognized that the Participant was value to their business.

DVJS approached Department of Social Services to request that the Participant return to DVJS and return on OGS (return as if nothing had changed) as the placement would be viewed as a non-payable outcome if the Participant recommenced with DVJS and was placed with same employer...although we would have loved to just place the person back there we could not sustain 26 weeks support without any funding as this ‘new’ job would be viewed as non-payable outcome under PPS.

We were told that this could not be done. The Participants program had ended and although the Participant was guaranteed employment, there was no assurance they would come back to DVJS after ESAt…as far as DSS was concerned we had done our job. Thus, we could not meet the employer’s needs or the Participants and they remain unemployed since returning to DVJS. Why couldn’t we just put them back, move on and have all parties happy? Why is the system so rigid?

The Non Payable Outcome guidelines for returning to a previous employer offer no fixed period for when a Participant may return to the employer and it is seen as a new outcome. We have had many situations when Participants return to DVJS after being with another provider and we know their previous employer would take them back but it is not an outcome for us.

One only has to consider the DES-ESS industry in regards to how quickly things can change…for example, a DVJS employment consultant that left the industry 12 months ago and came back today would find the job very different and they would need to be trained and inducted as any new employee, as well as meeting new work colleagues and management. DVJS has lost and let go a number of staff who could not keep up with change so why does Government presume that workplaces are static and that disabled job seekers can just walk-in after 12 months without any support? There needs to be a time-line introduced when a job with a previous employer is considered a new job not a non-payable outcome.

The Job Seeker Compliance (JSC) guidelines are in contradiction with the Disability Service Standards (DSS). The DSS is a requirement of funding yet has no bearing on performance rating. The JSC requires at least fortnightly consultation with the service provider, regular job search activity and must accept suitable employment whereas the DSS requires service providers to ensure the Participant is involved in decision making and choice & flexibility to meet individual needs. One has flexibility to service delivery the other is fixed with sanctions in place for non-compliance. When a Participant refuses suitable employment…who are we to argue with their reasoning and set sanctions in place?

***Casual Employment***

The labour market has significantly changed with many traditional basic manufacturing jobs suited to low functioning disabled job seekers gone being replaced either by automation or undertaken overseas. Businesses work contract to contract and as a result require a flexible workforce...often on a casual, as needed basis...these businesses do not necessarily need loyal employees but a flexible workforce. Unfortunately, employment with these businesses is not guaranteed to be ongoing and sustainable so would either not be able to be anchored & achieve benchmark hours or would be viewed as Non-Payable Outcome according to the guidelines. Service providers are unable to place people into these types of jobs as they are not assured of reaching some form of employment outcome and payment.

Many businesses also contract mainstream labour hire companies to provide their casual workforce, whom will generally not use people with disclosed disability. The Government needs a labour hire program (perhaps in association with the NDRC?) where service providers can link businesses and Participants to these fixed term, casual assignments. Work may not be sustainable within one business but via a number of short term assignments with various employers can provide income relief, valuable work experience & skills, self confidence, social inclusion for the Participant as well as raising positive awareness to employers about people with disabilities in open employment. Work is Work regardless of its contractual nature yet people with disabilities are being further discriminated as their programs of support are unable to represent them in all types of employment.

Employers now require staff that can work multi-stations due to the changing needs of their business. Many of our Participants are missing out on these opportunities as they are not as adaptable and unfortunately the wage incentives available are not sufficient to compete against some other employment programs that assist people less disadvantaged. Employers often ask... “why do I only get $1500 from DVJS when I get more from other providers who don’t need support?”

**Wage Subsidy Administration**

The majority of jobs obtained by DVJS are via job creation with a supportive employer...majority of our job seekers are not competitive for advertised positions. Thus, we need an incentive to ‘create’ the opportunity so that the employer is not out of pocket.

The wage subsidy for employing a person with a disability was significantly more when DVJS started in 1993 to what it is today $1500 ex GST. Under the minimum hourly rate of any current award, $1500 is barely enough these days to provide ‘incentive’ to create employment for a worker with a disability who requires support...it has reduced not gone up!

The wage subsidy is claimable twice in a financial year and can only be reimbursed to the provider after work has completed at least 6 weeks. For many companies who are watching their bottom line, they require a weekly incentive payment not wait until 6 weeks or longer. The issue here is what if the job falls before 6 weeks? Why should the employer not receive payment for the weeks worked?

When creating a job we need this to be at no risk to the employer financially. Obviously not every job is guaranteed, nor to last at least 6 weeks due to various reasons but in order to maintain goodwill with the employer DVJS makes the subsidy payment on the governments behalf when the job ends prematurely at our own expense…we cant afford this!

We need more flexibility in the administration of wage subsidies. If the annual amount per Participant is $3000 ex GST, then why can’t providers be able to offer it more than twice and be able to be compensated if a job falls within 6 weeks so they are not out of pocket? We understand that funds are limited but if we maintain our annual expenditure to $3000 per Participant what is the issue if that money maintains positive relationships with employers and can be better managed to create sustainable employment?

The Government should also introduce a subsidy sliding scale by degree of disadvantage (Program) where there is more money for the more disadvantaged than those less. This would be much fairer and make employing a worker with a disability more attractive option as it is absurd that DES-ESS offers the least amount of subsidy by any other employment program.

***Benchmark***

Participants are assessed their capacity to work via JCA/ Centrelink...their benchmark hours. If a job vacancy is obtained service providers must ensure that the vacancy ‘fits’ with the Participants benchmark hours for a successful job outcome. Many employers cannot guarantee regular work or even set hours but will generally consider 8 hours with a subsidy so for these companies it is very difficult to place a 15 or 30 hour benchmark person with them...they are missing an opportunity.

Recognise the job for what it is and has the potential to do. Benchmarks reduce the accessibility of employment outcomes.

***Assessment***

Many Participants report that their JCA appointment was more about listening to their JCA than their JCA listening and understanding their particular needs. The assessment is usually completed within 45 minutes.

There have been job seekers coming to DVJS who have been inappropriately assessed; either the benchmark hours are unrealistic or they are not suitable for open employment. We are not blaming the JCA but realistically a benchmark and suitability cannot be accurately assessed in 45 minutes and reviews at 3 months take resources away from DES providers and does get the JCA ‘upset’ by being challenged…not good for ongoing relationships! We have had numerous cases where job seekers are still requiring significant medical interventions and being diagnosed by their doctor as unfit for work being referred with 15 hour benchmarks...we are employment providers not miracle workers!

The assessment process needs to include assessors who have an understanding of labour market and actually worked with disability and should not determine how many hours someone is perceived to be able to work.

**Viability**

There has been no CPI increases to the funding model since its inception when the industry moved from Block Grant funding to the Cased Based Funding Model...a level 1 service fee was $890 then and it is still that today under DES-ESS and expected to be until the end of this contract term in 2018! Government is loading more and more upon service providers yet do not compensate the provider. The Public Service is being reduced whilst service providers undertake their duties...at some point providers will crash from overload and lack of funds.

Business is about profit and being able to cover overheads. Operational costs have risen each year and each year service providers have to tweak their services to cover…we need CPI increases urgently!

A key factor in quality of service provision is funding; one cannot expect eye fillet steak when only paying for sausages!