Comments on DSS DES Reform discussion document

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Summary of general ideas, followed by comments on selected discussion points

**A - General comments before responding to nominated discussion points**

**1** The second round of the Taskforce consultation took place in November and December 2015, which sought feedback on new approaches to delivering disability employment support and outlined a number of broad policy directions, including:

* a greater focus on long-term career planning and capacity building.

The current DES reform discussion paper talks about including a 52 week outcome payment as a way to generate more longer term sustainable jobs. In support of this and in lieu of more career planning from a government planner, it would seem possible to require successful DES contract applicants to have a given percent of employment consultants qualified to certificate 4 level or above in career counselling, say 5%, within 6-12 months of contract award. These employment consultants would develop a career plan ( with a job plan) with the individual, including the clients preferred longer term career direction. The client would then be moved to another employment consultant for the training/job search phase, updating the career plan as required. Research (Bernadette Gigliotti) indicates that longer term outcomes are achieved if the client buys in to the career direction job search process. Purely finding jobs the client is capable of doing , leads often to square pegs being pushed into round holes, which does not lead to sustainable jobs.

2 There also needs to be a standard web based system for development and keeping of resumes/ career plans /eportfolio etc managed/controlled by the individual. This would allow the individual the update the resume and plan throughout their life, helped by DES when involved. This could be part of or linked to my gov or my future website. Bravo Careers Central provides this but there are other providers.

3 The DSS taskforce discussion paper of November 2015 also introduced the concept of DES providing support through the client lifetime, rather than only in the unemployed phase or at risk of unemployment. Studies by DEA in 2015 , highlighted the potential benefit of a DES career counselling qualified employment consultant assisting with other advice to previous clients, whether under employed, under trained or underpaid. If 5% of employment consultants are qualified in career counselling, then this becomes a feasible ‘fee for service’ product offering by DES, to people currently in employment, and potentially, keeps them in employment. Or in the ongoing support phase.

4 In order to support the 2018 DES operation there needs to be more employment information available re assistive technology or work strategies for different disability types for generalist DES to access. This could be managed by asking all the existing welfare DSS funded disability specific organisations to develop/run an employment advice page/helpdesk for people with their disability, not a specialist DES just advice. They also have the responsibility for keeping the advice up to date. This would be available to Employers/DES/Teachers/Parents/Carers and also accessible through the Jobaccess portal, who might manage and coordinate, as essentially, its more detailed disability specific info supporting there own advice.

5 In parallel with this DES reform there needs to be incentives to persuade DSP receivers to try for work, and apply through a DES. Currently the ‘welfare trap’, as raised in the Mclure report on Social Outcomes in 2015, makes applying for work put their currently received welfare payments at risk. In America, they use an employment passport, to allow the individual to keep the allowances for 1 or2 years, in case the work dries up, and the individual has to go back to depending on the allowances.

The DES reform paper has already raised employer incentives, or reduced risks from employing somebody with disabilities who doesn’t work out.

6 Make half potential payment linked to 52 week 50% , with 25% at 13 weeks, and 25% at 26 week, or structure to allow des to get more money the longer the client works

7 Incentives to employer

* $ from tax saving if x% staff employment of people with disabilities reached
* risk management for unsuccessful staff, no change in workcover/company insurance until after employee successfully worked for 1 or 2 year

8 Incentive for individual, as there is a “welfare “benefits trap”, as Mclure suggested in 2015 report on social outcomes, introduce an employment passport to allow individual applying/registered with des, to keep all dsp/housing etc allowances for 2 year s, so have financial incentive to try for work.

9 DES be able to sign up full—time students at secondary or tertiary, 2 year before completion. Key being help to get work experience, mentoring and internships.

10 Introduce step change in 2018, but suggest highlight possibility, of step 2 2021, where ndia type funding approach, where money given to individual rather than DES, subject to client feedback and results from new DES model . Agree new annual customer survey will start with new contracts, results will be available on websites, and key info will be provided to individual through news desk on mygov or my future website.

11 DSS consider tertiary student disability allowance as UK/NDIA be introduced as well as a new targeted professional DES service, appropriately resourced, be introduced, as part of DES. Maybe separate contracts. Currently only the DES, Edge in WA have an appropriately resourced service.

12 Funding to provide for on going support and outcomes, incentivized accordingly, as per proposed.

13 More support for the JIJ scheme, or conceptually advice for employers in dealing with people with a new disability category – those who acquire a disability naturally, or whose disability becomes more significant, who want to stay at work and may never have been clients, potentially 50% of the market. Advanced service- even fee for service – for employees funded by insurance.

**B Selected Discussion points feedback given in italic writing.**

**Discussion Point 1: More Choice for Participants**

1. What, if any, restrictions should there be (for example, region or distance) on participants choosing to attend a provider?
2. How often should participants be allowed to voluntarily transfer or switch providers?
3. What should be the basis of referral by Centrelink for participants who do not choose a provider?

*The participant chooses the provider, where there is choice, because the provider is offering a better service offering than the other e.g. if I am looking for experience with employment outcomes for people with autism. So initial information on what the provider offers will often determine preference. Subsequent information on quality of service from previous participants will be needed. Essenttially, this involves discussion point 4 .*

*All of this defines expectation of service, which if not met, can then lead to dissatisfaction and desire to leave.*

*So , I would argue the proposed 3 changes in a 12 month period seems reasonable.*

 *For those who don’t choose a provider, Centrelink should recommend by disability type/speciality and distance from home.*

**Discussion Point 3: Job Plans**

1. Should Job Plans have minimum requirements beyond what is necessary for mutual obligation requirements? Or should this be determined between each participant and their provider?
2. How can we ensure that participants are actively involved in the development of their Job Plans, or will the ability of participants to change providers if unsatisfied be sufficient?
3. How should providers be held accountable to ensure activities in the Job Plan are undertaken and supports are delivered? Will the ability of participants to change providers if unsatisfied be sufficient?

**Regulation: Increased**

Introducing more detailed Job Plans would increase regulation on providers as they would be required to record progress against activities and supports recorded in the Job Plan which is not currently required.

*Job Plan should include the Career Plan, developed by the Career counselling qualified Employment Consultant. It can then include other information for Government payment, relevants supports, as well as the mutual obligation requirements.*

*DSS should develop a web based career/job plan centred system, using existing off the shelf systems to ensure all providers are using the same system, so transference is easy, but also so resume info is not lost. Equally, a web based system then allows the participant to own and update the career plan/resume themselves after leaving the DES system. There maybe a need for certain info to be private to DES but equally, there will be some s tuff private to the individual and he can access post DES.*

*Potential the career system could also be used in schools, so allowing, subject to the individual, for data to be transferred.*

**Discussion Point 12: 4-week and 52-week Outcome Payments**

1. What should constitute an employment outcome under DES in a modern Australian economy?
2. How should the DES funding model incorporate the growing number of short term jobs available in the economy? Like employers talk about EFTs, equivalenty fulltime employees, maybe a casual role, can be converted into ongoing equivalent weekly hours (averaged from a months hours), to compare with an ESAT given employment service.
3. Should the new model replace the job placement fee with a 4-week outcome payment, and how many 4-week outcome payments should be available for each job seeker?
4. How should job seekers be supported in the period between the 26-week outcome and the 52-week outcome?
5. What level of payment should be attached to the 52-week outcome while keeping total DES expenditure within the current funding envelope?

***Currently, there seems little attempt to understand what the client wants career wise. The process focuses purely on what the participant can do and therefore must do for a job. For longer term sustainable roles, there has to be discussion around the participants desired career direction, as far as possible. This supports the need for career qualified employment consultants to be involved for the first 2 months to develop the career and job plan, which is the guide for job search focussed employment consultants.***

***The other aspect that comes up, particularly for younger people with minimal work experience, is often they have been able to do very little career exploration e.g. work experience tasters to try different career areas e.g. horticulture, child care, agedcare, retail, hospitality, manufacturing, working with animals. A 4 or even a 2 week work experience outcome may be appropriate , as it is adding work experience to the individual and the resume. This work experience may also be for only a few hours a week, so under the employment service specified for the participant.***

***Before defining an employment outcome, it may be worth defining or outlining possible DES “getting to employment” processes, as participants differ.e.g. older or people with acquired disabilities may have significant work experience, so technical skills rather than social skills may be needed. Equally, end employment may differ re fulltime, part-time, casual etc, as you have highlighted.***

**Discussion Point 15: Determining Eligibility and Employment Outcomes for ESLs**

1. Who should be able to qualify under revised assessment criteria for ESL?
2. How could the level of disadvantage and work capacity be assessed for secondary school students?

**Extending eligibility to year 12 secondary is useful**

**But also consider DES could help with:-**

**1 specifically with the one week work experience in year 10, for students with disability.**

**2 with tertiary students in final 2 years, as internships, leading to jobs tend to happen in final year, so help in applying is in the pen-ultimate year. This also pre-supposes that DES are resourced to provide a professional service ie for degree educated people.**

**Discussion Point 16: Improving the Gateway**

How can gateway arrangements be improved to enable a better connection to employment services for people with disability? *Do review then decide/discuss.*

**Discussion Point 17: Assessments Review**

1. What other aspects of ESAts/JCAs should be examined in the review?
2. Should there be:
	1. greater separation of ESAts and provider’s own assessments, with ESAts focused on eligibility, work capacity and appropriate referral within DES and not extending to suggested interventions?

OR

* 1. should ESAts be developed and extended to provide more and better information on which providers could base their assistance, with less need to perform their own assessments?

How should the revised assessment process fit with other options for DES reforms outlined in this Discussion Paper?

*If we say assessing people is feasible eg via ESAts then a persons capability is identified and rated. But the other key assessment is that of motivation, does the person want to work? And the reality is the person may want to work in one area and not in another. So if ESAts lead to a capability assessed, the provider has to review work interest through career counselling review or career guidance intervention prior to moving into job search mode. As a sustainable job must have elements of meeting the individuals desires combined with individual capability.*

*Policing Newstart or DSP income at the same time as trying to find a sustainable role for the individual is difficult, and may not drive the behaviour of the individual towards a sustainable job.*

**Discussion Point 18: Ongoing Support**

1. Should the fee-for-service funding model specify minimum contacts and hours of support?
2. What minimum servicing requirements should there be for each level of support?
3. How should payments be determined for each level of support?

*Assessment of ongoing support after 24 weeks makes sense.*

*The ongoing support could include career advice re underemployment, training etc. The issues were all highlighted in DEA ‘s trial in 2015 on providing firther support to clients who had got jobs and needed further advice. The trial highlighted the benefit of this type of support to the individuals.*

**Discussion Point 19: Job-in-Jeopardy**

1. How can we better define when someone’s employment is considered to be at risk due to their disability?
2. How can we increase employer awareness of JiJ?
3. Does the current fee structure reflect the services being provided and outcomes being achieved?
4. What is a more appropriate name for Job-in-Jeopardy?
5. If a JiJ participant chooses not to disclose their disability to an employer, how should providers assist them in the workforce?
6. Should the JiJ service be integrated with Ongoing Support?

*There is another large group who need JIJ help, those who acquire disabilities or whose disability becomes more serious, enough to need to disclose. Who helps them or the employer, as most often they are made redundant. The size of this cohort needs to be researched, as ABS data indicates that approx. 30% of all people with disabilities acquire their disability during working age i.e more than a million people. So if half of people with disability of working age don’t have a job , this segment of people with disability could be over 250,000 , and assuming 200,000 out of 1 million unemployed access DES, SO 20%, THEN could be 50000 of your potential clients could be at risk of job loss and need JIJ help . So significantly above the current 5000 who apply to JIJ.*

Chapter 8 feedback – Building employer demand

*To assist employer education or ability to get help/advice on specific disabilities. Suggest that through Job Access portal, every disability specific welfare group funded by DSS, be asked to develop and maintain a web page around employment strategies or/and assistive technology relevant for individuals of that disability group. The supporting help desk may provide advice to employers, teachers, parents and individuals. The additional benefit of this, is that by dividing the task between groups it becomes feasible to keep this information up to date.*