Carers Australia

Submission:

New Disability Employment Services from 2018 –

Response to Discussion Paper

2 DECEMBER 2016

AN AUSTRALIA THAT VALUES AND SUPPORTS ALL CARERS

ABOUT CARERS AUSTRALIA

Carers Australia is the national peak body representing the diversity of Australians who provide unpaid care and support to family members and friends with a:

- disability
- chronic condition
- mental illness or disorder
- drug or alcohol problem
- terminal illness
- or who are frail aged

Carers Australia believes all carers, regardless of their cultural and linguistic differences, age, disability, religion, socioeconomic status, gender identification and geographical location should have the same rights, choices and opportunities as other Australians.

They should be able to enjoy optimum health, social and economic wellbeing and participate in family, social and community life, employment and education.

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General Comments

Carers Australia welcomes the opportunity to provide comments to the Department of Social Services (DSS) in response to the ‘New Disability Employment Services from 2018’ discussion paper (the Discussion Paper) and to assist with the Department’s consideration of Disability Employment Service (DES) reform. This submission will primarily focus on the role that family and friend carers could play in the DES space, but will also provide other relevant information.

Carers Australia acknowledges the genuine interest in suitable and sustainable reform that this Discussion Paper projects. We further acknowledge the genuine interest of DSS in engaging stakeholders through this process, and thank DSS for having an extended consultation and submission period.

Carers Australia agrees with the statement in the Discussion Paper that employment can provide financial independence, a better standard of living and improved physical and mental health.[1] However, we would also point to the great benefits of the social interaction and engagement that come as a byproduct of work.

We would also like to express our satisfaction that DES will continue as a separate and unique employment program. As noted in the Discussion Paper, jobactive and the historical DES framework has a poor track record of delivering sustainable employment opportunities for people with disability. To ensure equality of opportunity, and tailored supports and services, DES must remain a separate but complementary service to jobactive and other employment pathway programs.

Carers Australia notes that carers were not mentioned in the Discussion Paper. It is important to identify circumstances in which carers could or need to be involved in the DES journey, such as when a person with an intellectual disability or mental health issue causing episodic inability to participate in structured work activities or work is engaging DES, or at any other time where the participant has requested their family or friend carer to be involved. The DES framework would need to accommodate these situations.

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[1] Department of Social Services (2016) New Disability

It is important that family and friend carers of DES participants should not be overlooked in this process. Carers by definition have a unique, in-depth and unparalleled relationship that could be tapped into to assist with choosing a provider, facilitating information flow and assisting with participant controlled funding where that is needed.

Carers themselves have a legitimate interest in the employment opportunities for the people they care for as this will affect their wellbeing as well.

In the era of joined-up-government, co-design and integrated policy, we are puzzled that a number of areas have been ruled out of scope for this Discussion Paper. These include the NDIS, jobactive, transition to work and the Indigenous community development programs. It is clear from the list provided that many, if not all, out of scope matters are interrelated with DES. It is our hope that this DES reform does not happen in isolation.

Responses to Discussion Points

Discussion Point 1: More Choice for Participants

Participants should be able to engage a provider of choice. There ought not to be any restrictions placed around this, with the exception of preventing participants from choosing a specialist provider for which the participant does not meet the entry requirements if this would prevent the provider from accepting specialist clients.

> *Specialist Providers provide services to participants with specific disabilities or additional barriers to employment. For example, specialist mental health DES providers service participants whose mental health situation is a major barrier to employment. There are also specialist groups for Indigenous Australians, ex-offenders, the culturally and linguistically diverse and youth, in addition to those who are vision or hearing impaired, or have an intellectual or psychiatric disability. (DSS, New Disability Employment Services from 2018 Discussion Paper)*

This ensures that individuals with a particular disability or further complex barriers prohibiting them from entering the workforce can choose their specialist provider, if they so choose. Of course, individuals who have access to a specialist provider may choose to engage a non-specialist provider, especially if the non-specialist provider is closer to home, can meet their needs, or they may have friends or family attending the same provider and have heard positive reports of the provider’s quality of service.

Participants must be able to voluntarily switch providers as they consider fit.

However an appropriate communication mechanism should be put in place so that the DSS and/or the Department of Human Services (DHS) become aware of the change, and the reason for the change. This mechanism should be outside of the relationship between the participant and the provider to ensure the information in not edited by the provider – that is, the communication should occur directly between the participant and DHS. This feedback loop will assist DSS and/or DHS in reviewing the conduct and service of providers and will likely assist in increasing the quality of service.

Discussion Point 2: Provider / Participant Contacts

> *DES participants and providers are currently required to meet face-to-face for a minimum number of contacts specified in the DES Contract. This has not taken into account the changing technology landscape. DSS, New Disability Employment Services from 2018 Discussion Paper)*

Face-to-face meetings should be but one in a suite of communication options. Providers and participants should be encouraged to communicate via new and innovative channels. However, the method of communication must be decided by the participant not the provider, from a diverse suite of communication options. This is to ensure that the participant is not disadvantaged by the chosen communication method. Similarly, the timing of these conversations should be agreed upon mutually by the provider, participant and, where appropriate, the carer.

Discussion Point 3: Job Plans

Each Job Plan should be a comprehensive document collaboratively developed with the provider, participant and the participant's carer. It must include clear targets and the responsibilities of all parties. It must also clearly set out the requirements of the participant, job readiness opportunities being undertaken and services and supports being accessed. It must be an unambiguous pathway to employment. It should also have defined periodical and outcome reviews to ensure it remains relevant throughout the participant's DES journey.

> *The Job Plan underpins the provision of services to DES participants and all participants are required to have a current Job Plan*

Job Plans could be randomly audited by DHS to ensure that participants and, where appropriate, their carers were fully involved in the development of the Job Plan. This audit could be a comprehensive review, or simply a phone check with the participant or their carer. A similar process could be adopted to ensure that providers are delivering on their actions under the Job Plan.

Discussion Point 4: Better Information for Participants

Participants and their carers should be able to freely and readily access material that will enable them to make fully informed decisions about providers, services and supports they are choosing. However, this material should be provided using channels and methods that are appropriate for the participant, taking into account the vast array of learning styles and cognitive abilities of individuals engaging with DES.

> *There is a lack of transparent information available for participants about what services they are eligible to receive and the quality of providers to deliver those services. DSS, New Disability Employment Services from 2018 Discussion Paper)*

While DSS is enthusiastic about providing digital material, this may not always be appropriate. DSS, DHS, and providers must be able to provide material in hard copy format. Similarly, static digital material is not always useful; so infographics, videos, engaging social media narratives, and even games, BuzzFeed and/or TEDx style engagement channels should be developed.

Further, DSS should encourage providers (through the DES contracts) to ensure that the information they provide is equally as dynamic and tailored to the needs of the individual.

Carers Australia does not believe that further regulation needs to be developed regarding false or misleading claims being lodged against providers. A robust statutory and common law legal framework exists across all jurisdictions that can deal with any issues if required.

Discussion Point 5: Participant Controlled Funding

Consideration should be given to the role that carers will play in assisting the person they provide care for in accessing and using participant controlled funding. Carers could play an invaluable role in assisting their care recipient in ensuring the funding is expended on appropriate supports and/or services at an appropriate time.

> *Participant Controlled Funding gives participants more control to purchase what goods and services they think they need to get into the workforce. When a participant starts in DES, a portion of their DES funding would be quarantined for their use in a separate account. The participant would receive information on their account, including how much money is in it and how to use it. Each participant would be able to determine how the funds are spent, so long as they are consistent with a set of guiding principles. DSS, New Disability Employment Services from 2018 Discussion Paper)*

The funds should be guided by the principles of equity and fairness. In order to clearly articulate how equity and fairness would be applied to each participant, the expenditure of the funding should be included in the Job Plan. This will ensure the provider, participant and, where appropriate, carer are involved in the decision making process.

If carers are engaged throughout the DES journey, they can be active in supporting the participant’s decision-making process or make the decision for the participant when a participant is unwilling or unable to use individualised funding, if they have the legal ability to do so. This may mean that the carer can expend the funding for and on behalf of the participant.

Discussion Pont 12: 4-week and 52-week Outcome Payments

DES should adopt an employment milestone of 26-weeks and a final outcome of 52-weeks; with 60% of the funding envelope being paid to the provider on achievement of a 52-week outcome. To overcome any financial stress that the provider may face in the first 18-months of the contract, this outcome payment could be designed on an acquittal process based on the expected number of participants to reach a 52-week outcome in first 18-months of the contract. This would harmonise DES milestones and outcomes with other targeted employment programs.

Participants should be continually engaged throughout the second half of the 52-week period by their relevant provider through ongoing mentoring/coaching or peer support activities. Consideration should also be given to the participant receiving a financial incentive for achieving the 26-week milestone and 52-week outcome, and the appropriate method for this incentive to be disbursed.

Discussion Point 15: Determining Eligibility and Employment Outcomes for Eligible School Leavers

> *Eligible School Leavers' (ESL) are young people with a disability that is either specifically recognised by the education system or as a DSP recipient. DSS, New Disability Employment Services from 2018 Discussion Paper)*

Recognising the importance of secondary education, but also acknowledging the need to link post-education and pre-employment readiness, Carers Australia believes that eligible school leavers should be considered those in their second semester of their final year of Junior High School (generally Year 10) or Senior High School (generally Year 12).

This will allow the potential participant to commence the transition process to employment pathways at roughly the same time as the rest of their school cohort is commencing the transition to further study or employment opportunities. Permitting a six month transition will also allow the potential participant the opportunity to research their potential provider, and navigate the complexities of the DHS/DES admission process, we do not propose that school students engage in activities through DES providers other than working through any pre-commencement administration and building rapport with their chosen provider.