

Dr Ann Nevile

Honorary Associate Professor
Centre for Social Research and Methods
The Australian National University

+61 2 6125 3492
Ann.Nevile@anu.edu.au

CRICOS Provider No. 00120C

Thank you for the opportunity to comment on the Discussion Paper, *New Disability Employment Services from 2018*. My comments relate to the following Discussion Points:

- Discussion Point 1: More choice for participants
- Discussion Point 2: Provider/Participant Contacts
- Discussion Point 3: Job Plans
- Discussion Point 4: Better information for Participants
- Discussion Point 5: Participant controlled funding
- Discussion Point 17: Assessment Review

Discussion Point 1: More choice for participants

1.1 As noted in the Discussion paper, restrictions on choice of provider reduces competition between providers and lessens the pressure on service providers to deliver flexible, individualised services. For this reason I believe **all restrictions should be removed**.

1.2 Allowing participants to voluntarily transfer to a new provider up to three times in the first 12 months of participation, and up to twice in the following year strikes a reasonable balance between enabling more choice and control for participants, while giving service provide time to deliver on agreed activities which are set out in an individual's Job Plan – see comments under Discussion Point 3.

1.3 If participants feel unable to choose a service provider, some element of participant choice could still be maintained if Centrelink had a discussion with the individual participant about their general preferences based on the criteria listed in the Discussion Paper. For example, participants who may not feel able to identify a specific service provider, could be asked whether they would prefer to be referred to a local provider, or a provider which has a particular specialisation or caseload profile. **I would argue against using provider performance as a criteria for default allocation while the current performance management framework remains in place because this framework does not reflect what service users value** (see Nevile and Long, 2016 for a more detailed discussion of this point).

Discussion Point 2: Provider/Participant Contacts

2.1. Face-to-face contact is desirable because it facilitates building and maintaining the sort of trusting relationships that participants value and hence is an important part of quality service provision. However, there may be circumstances where individual participants find it difficult to access the service provider of their choice but are able to communicate with their preferred service provider using technology such as Skype. In other words, **face-to-face communication should be the preferred method of communication but should not be an absolute requirement.**

2.2 Based on the principle of maximising the capacity of service providers to deliver flexible, individualised services which are responsive to participants' changing needs, **the frequency of contact should be jointly determined by the individual participant and the service provider** and should be set out in each Job Plan, as should any subsequent changes.

Discussion Point 3: Job Plans

3.1 Job Plans must include minimal mutual obligation requirements, but must also be a positive tool for enhancing participant choice and control over what sort of services they receive because this reflects service users' definition of high quality service provision (Nevile and Long,2015:45-46). For this reason, **any content beyond the minimum requirements should be jointly determined between each individual participant and their service provider and should set out what the service provider will do, (approximately) how much this will cost, and what the participant will do.**

3.2 It is not possible to ensure that all participants are actively involved in the development of their Job Plan. Making it easy for dissatisfied participants to move to another service provider is the most efficient way of 'nudging' providers to make strong efforts to actively engage participants.

3.3 Given the need not to increase regulatory burden on service providers unless the benefits substantially outweigh the costs, facilitating 'exit' and publicising the rate of dissatisfied exits for all service providers is the best way of holding service providers accountable (see Discussion Point 4).

Discussion Point 4: Better information for participants

4.1 and 4.3 Enhanced control for participants is dependent on access to information, but a balance needs to be struck between providing information valued by participants and providing so much information that choice becomes harder not easier. The way information is organised and presented is therefore very important, as is the point in the process when particular types of information are brought to the attention of participants. Basic information on how to access services, what sort of services are available and the funding that is attached to them should be provided by the Department on user friendly platforms. Information on provider performance is currently available to participants, but does not fully reflect what participants' value because it does not contain information about quality processes and is anything but transparent. For this reason, providers should be encouraged to disseminate performance information that is transparent, reflects participants' definition of quality service provision as well as actual employment outcomes (for a more detailed discussion of this issue see Nevile and Long,2016:30-31).

4.2 Because of the difficulty and cost involved in ensuring no false or misleading claims are made against DES providers, the government should leave it up to individual providers to decide whether or not they wish to include individual reviews/comments as part of the information they make available on their own platforms.

Discussion Point 5: Participant controlled funding

Because of the potential risks identified in the Discussion Paper, setting aside a proportion of an individual's funding package over which the participant has total control is not recommended. **As an alternative, and as a way of enhancing participants' capacity to make decisions about what sort of services should be purchased, participants should be informed about the amount of their funding package and together with the service provider agree on how this amount is used as part of the Job Plan process** (see Discussion Point 3). While the funding remains with the service provider, this alternative can be seen as a transition strategy leading into full participant controlled funding at some point in the future.

Discussion Point 17: Assessments Review

17.2 Option 2a has greater potential for participant involvement in discussions around preferred interventions; that is, it is consistent with the principle of more choice and control for participants. For this reason greater separation of ESATs and providers own assessments are preferable to expanding the use of ESATs and reducing the need for provider assessments.

References

Nevile, Ann and Brendan Long 2016, 'Beyond the Stars: a new performance management approach for disability employment services'.

Nevile, Ann and Brendan Long 2015, 'Measuring Quality: An Interim Report produced for NDS and Jobs Australia'.

Dr Ann Nevile
14 December 2016