



16th December 2016

Submission: Disability Employment Services Reform - December 2016

Thank you for the opportunity to comment on Disability Employment Services Reform 2016. The Illawarra Forum has consulted with its members and stakeholders to develop this submission. While the opinions offered reflect the Illawarra and Shoalhaven regions, we feel confident that many of the issues raised will be echoed across NSW, particularly in regional areas.

About the Illawarra Forum

The Illawarra Forum is the peak body working for community services organisations and for communities in the Illawarra and the Shoalhaven. We support community organisations, promote expertise and innovation in community development, foster industry development and advocate for social justice.

For more than twenty years, the Illawarra Forum has taken a leadership role in the local community services sector, which currently consists of more than 300 organisations across the Illawarra and Shoalhaven areas of NSW.

As part of our leadership role, we engage with those organisations, services and individuals engaged in supporting employment opportunities for people living with a disability to collect their opinion, expertise and recommendations.

The Illawarra Forum works closely with numerous organisations which provide support to people living with a Disability across the region including:

- Disability Employment Services ;
- Transition to work, and Australian Disability Enterprise providers;
- Services for people with disability;
- Job Active providers
- Community development and community capacity building programs.
- Registered Training Organisations

The Illawarra Forum welcomes the opportunity to submit to the Disability Employment Services Reform.

The process surrounding employment for people living with a disability is complex and challenging. Not only does the process require examination of the employment prospects of people with complex needs, but also negotiation of a system that spans multiple government departments as well non-government organisations including charities, not for

profits and corporations. Illawarra Forum is therefore concerned that the Disability Employment Service (DES) reforms are being discussed in isolation from related programs such as Transition to Work (TTW), and Australian Disability Enterprises (ADE). In addition, we also recommend cross departmental interaction to ensure the disability employment system incorporates enabling infrastructure requirements such as housing and transport

The disability employment system must be addressed holistically to achieve the best outcomes for people living with a disability. For example, people currently employed in an ADE are not able to access DES, hence restricting their opportunities to enter open

Case Study

A local ADE provider has indicated that currently approximately 3% of their ADE clients move to DES for support to move to open employment.

Of these, approximately 70% returned to their ADE provider.

The primary reason for their return is that they did not receive the level of specialist support that they had previously experienced from their ADE provider.

employment.

The current DES system does not address the needs of young people who are still at school. There is significant evidence to demonstrate that young people who begin employment while still at school ^{1,2} demonstrate greater success at maintaining employment throughout their lives than people who enter the employment market later.

In addition to placing people with a disability in employment, there should be opportunity to support self-employment and entrepreneurship³. The Department of Employment recently launched the Encouraging *Entrepreneurship and Self-Employment Initiative* which provides training and mentors for young people to develop skills in their own businesses. This style of program could be invaluable for some people living with a disability to build independence and confidence outside of the traditional employment model. A program based on the existing New Enterprise Incentive Scheme (NEIS) program could be customised and funded appropriately to accommodate the needs of people living with a disability.

Information from many of our services has indicated that education and support for employers is a significant omission in the existing program. Development of skills for supporting people with a disability, and making the culture of the organisation more accessible is important to success. We therefore recommend training and support for employers. We would welcome the expansion of the National Disability Recruitment consultant (NDRC). The NDRC aims to develop the confidence and organisational capacity of

businesses with over 100 employees to offer employment opportunities to people with a disability. We would welcome the opportunity for the role of the NDRC to be expanded to support small business⁴, so they can be optimally supported in employing people with a disability.

<p>Discussion Point 1: More Choice for Participants</p>	<p>It is critical that initial assessments between the provider and client are done face to face. Reasonable travel time must also be incorporated to account for distance from providers, particularly in regional and remote areas.</p> <p>Whilst movement between providers could be beneficial to the participant, there would need to be strict limits and systems in place to ensure clients don't get lost in transit. We recommend that a maximum of 2 changes be allowed in the first year.</p> <p>The user choice model assumes that people want to find work. This is not always the case and could lead to "unsatisfied" clients. This is not true dissatisfaction and services should not be unfairly penalised in such cases.</p> <p>With user choice, and ability to have uncapped referrals there must be measures in place to stop providers using "enticements" to gain clients. Lessons must be learned from the VET reform where inappropriate enticements such as laptops and tablets were used to encourage disadvantaged students to enrol with unscrupulous RTOs</p>
<p>Discussion Point 2: Provider/Participant Contacts</p>	<p>Illawarra Forum welcomes the review of current assessment methods which in the past have been very inequitable. Current assessment practices are overwhelming, and efficacy is questionable.</p> <p>It is vital that assessments be conducted face-to-face, particularly for the initial assessment, but we recognise this may be challenging in rural and remote areas. Online web conferencing links could be made via local technology centres, schools, and libraries to enable web conferencing and support clients without internet in their homes.</p>
<p>Discussion Point 3: Job Plans</p>	<p>Job plans should contain a set of activities to complete between each meeting. This should include mutual obligation, and activities to support the person on their journey to employment. All job plans should be living documents that adapt to the changing situation of the individuals rather than a static document.</p>

	<p>Ideally job plans will utilise technology so that plans are available on mobile devices, include time frames and reminders etc. This will provide some ownership and control, rather than just being a piece of paper that is filed away.</p> <p>We concur on the requirement for more detailed job plans as a tool for the provider and the participant, but suggest putting more onus on the participant to update progress against the plan, rather than the provider.</p> <p>Funding for the participant could be linked to the job plan, and allocated against agreed activities. This would allow monitoring by both participant and provider and ensure a longer-term approach to planning.</p> <p>Ongoing support could be provided by completely separate organisations, as it requires different skills sets.</p> <p>There must be recognition of casual work and short term contracts within the system. Eliminating the placement fee for a 4-week outcome is a good idea, but this should be limited to 3 per year, and no wage subsidy or related entity employment should be allowed.</p>
<p>Discussion Point 4: Better Information for Participants</p>	<p>The star-rating system is the current method for indicating the performance of a Disability Employment Services provider. This rating is available to Government, employers and potential clients.</p> <p>The Illawarra Forum recognises the need for some form of public evaluation rating system, however the star rating system needs to be reviewed as it may not be flexible enough to accurately assess performance of providers. Where success is marked by outcomes, there may be the opportunity for DES providers to choose to support clients who have the greatest potential for a positive outcome, to the detriment of clients who may be more challenging to place in ongoing employment.</p> <p>Testimonials can be an effective way of gaining an insight into a DES, but as other programs have demonstrated, this system is also open to abuse.</p> <p>Information that should be available includes:</p> <ul style="list-style-type: none"> • Online opportunities - Are all online opportunities meeting appropriate standards of accessibility? Do

	<p>they have access to online opportunities such as web conference, forum and discussion boards?</p> <ul style="list-style-type: none"> • Specialist training and experience of staff. • Whether all staff have regular police checks. • Success rates. • Case studies and testimonials by clients and employers. • Information similar to the My Skills website which includes a wide range of data on providers.
<p>Discussion Point 5: Participant Controlled Funding</p>	<p>Disability Employment Services support clients with high complex needs, but the current system is inflexible. With the advent of client-controlled funding (within appropriate guidelines), some of this inflexibility may be addressed as clients will be able to make individual choices.</p> <p>If, for example, the client was a former ADE client, it would be advantageous for the individual to utilise their funds to engage the services of former ADE staff members in a mentor role. This opportunity may make the transition in to open employment more manageable.</p> <p>Measures must be put in place to stop providers using “enticements” to gain clients. Experiences with VET Reform, in particular the VET Fee help structure should be examined to explore lessons learned.</p>
<p>Discussion Point 6: Entering the DES Market</p>	<p>We are generally in support of providers entering the panel however, we are concerned about the impact on participants If providers were coming in and out of the system regularly. We recommend that there should be at least 18 months between provider changes.</p> <p>The current structure of the DES program fosters success from larger organisations and makes it more challenging for small providers to be able to compete. With this in mind, we are supportive of the proposal to introduce a provider panel. The introduction of provider panels have been successfully implemented recently by the Department of Employment and Education.</p> <p>We recommend all providers on the panel should operate on a not-for-profit basis, have effective governance in place, be compliant with Disability Service Standards, and have a mission and set of values that aligns with the DES outcomes.</p>

<p>Discussion Point 7: A Single DES Contract</p>	<p>Separate ESS and DMS contracts are not required if participants are assessed individually with funding dependent on their level of need. Possibly DMS clients could move to job Active.</p>
<p>Discussion Point 12: 4-week and 52-week Outcome Payments</p>	<p>Managing clients after the 26 week period is very difficult. Unless there are issues in which there is ongoing support, the aim is independence and therefore DES providers should be able to step away. Ongoing Support and Job in Jeopardy assistance should cover this, and there should not be financial reward for the 52 week outcome.</p>

Thank you for the opportunity to comment on the Disability Employment Services Review, for further information about this submission, please contact nicky@illawarraforum.org.au or 02 4256 4333



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