

New Disability Employment Services from 2018 Discussion Paper

Submission by Forrest Personnel Limited December 2016





Forrest Personnel has been in operation since February 1986 and is owned and operated by community members. Forrest has a history of providing employment assistance to people with a disability in Regional and Metropolitan fringe areas of Western Australia. Forrest Personnel takes its name from the original electorate that was the base of our first service in 1986.

Our full time sites now include Bunbury, Busselton, Albany, Manjimup, Collie, Narrogin, Margaret River, Pinjarra, Geraldton, Kalgoorlie, Esperance, Mandurah, Rockingham, Kwinana and Success.

Forrest Personnel's mission is to enrich lives by finding employment for people with an injury, medical condition or disability so they can make the most of their abilities to achieve their life goals.

Forrest Personnel is pleased to provide the following submission in response to the New Disability Employment Services from 2018 Discussion Paper.

Forrest Personnel support:

- Increased participant choice and control. Forrest Personnel's service delivery model is founded on a client centred approach and we are committed to our vision that "No Ability is Wasted."
- Reviewing the current gateway and assessment processes so people with disability are being allocated to the right service at the right funding level
- Creating better links between education and work, including allowing more students with disability to access DES as they prepare to, and, leave school
- Improved efficiency in the DES programme

Improving Participant Choice and Control

Restrictions on participants choosing to attend a provider

Forrest Personnel have historically provided services to participants who live outside capital cities and in areas that many other providers do not service. Forrest Personnel have established a significant footprint in Regional Western Australia over the last 30 years. We believe it is important that both participants and government have access to services over a broad geographic area. Forrest Personnel believe this is best achieved by maintaining Employment Service Areas (ESAs) and business share in Regional, Rural and Remote areas. We believe that participants should be able to choose a provider that has an office in their town, or within reasonable travelling distance, and maintaining ESA's and business share is the best way to safeguard this.

How often should participant be able to voluntarily transfer or switch providers?

Forrest believe that participants are already able to transfer between providers relatively easily. We believe that participants should be able to transfer a maximum of three times per year, but believe a participant should have to spend a minimum of six weeks with a

provider before being able to transfer. Forrest Personnel conduct a comprehensive vocational assessment and goal setting programme during the first four to six weeks of programme and find that a portion of participants with mutual obligation requirements seek medical exemptions during this period as a method of avoiding participating. We also find that during this period previously unmotivated participants start to develop a sense of hope that a return to work may be possible for them.

How should Centrelink refer participants who do not choose a provider?

Forrest Personnel believe that Centrelink employees need comprehensive training on the services that DES offers and the difference between DES and Job Active. We find that participants with a current referral to DES are often referred to Job Active instead of DES. It is important that whatever referral system is implemented that all providers are treated equally and fairly – this would be easier if business share were maintained.

More flexibility in the mode of service delivery

Should face-to-face requirements remain?

Forrest Personnel maintains that face to face contact should remain the preferred method of service delivery. However given the isolation of a significant number of Western Australian job seekers we believe that some flexibility should be allowed to utilise video conferencing technology to participants who live more than 90 minutes from their service provider. Where a participant lives more than 90 minutes from a DES provider Forrest believe that face to face contact would be required at least once every six weeks and at least fortnightly contact via video conferencing.

Job Plans

Forrest believe Job plans should be, and are, negotiated by the participants and providers.

Greater Competition and Contestability

How often should the panel be open to new providers?

Forrest Personnel are concerned about the unintended consequences of allowing greater competition in Regional, Rural and Remote areas. If the number of providers were to be increased we believe that new providers would need to demonstrate how they would service areas that did not have a physical provider presence in the area/town at the time of opening up the market. How would the Department guarantee that new providers entering the area were servicing the smaller, and more, remote towns in the area and not jeopardising the viability of providers providing a service – often at a loss – to the whole region?

Criteria for joining the panel?

- Demonstrated commitment to the area, people with disability and DES
- Proposed investment in the area
- Point of difference from existing providers if new providers joining a panel

- Meeting National Standards for Disability Services
- Being financially viable
- Having robust quality systems and internal controls

Forrest Personnel believe that DES 2018 should allow for indexation of fees and that this should occur at the point in which new providers join the panel.

Minimum caseload

Forrest Personnel have demonstrated a commitment to servicing the regional, rural and remote areas of Western Australia for many years. We are actively interested in making sure the people of the regions continue to receive the benefits of DES. In order to supply DES in a specific ESA, or regional centre the minimum caseload should be 26.

ESA coverage

Forrest believe that any provider in an area must demonstrate a commitment to the whole region, not just the major towns.

A single DES Contract

Forrest believe the onus should be on Providers to demonstrate that they have the capacity to deliver both DES-DMS and DES-ESS and Ongoing Support.

ESAs

Should there be ESA's?

Forrest supports the retention of ESA's and business share in Regional, Rural and Remote areas. We welcome the reduction of red-tape and compliance.

Preventing Market Failure

The discussion paper we are responding to acknowledges that metropolitan areas can sustain competitive markets with providers remaining viable with a smaller market share than is the case in regional areas, and the risk of market failure is higher in regional areas. Forrest is deeply concerned that abolition of ESAs and market share would threaten the viability of providers in Regional, Rural and Remote Western Australia.

Short term and long term employment outcomes

Forrest believe that short term job placements are a positive outcome for anyone who is unemployed, particularly for the long term unemployed. Forrest supports the idea of incentives for short term job placements that are consistent with career development or furthering a participant's future employment prospects. A short term placement should be consistent with a participant's Job Plan history.

Risk adjusted outcome fees

Forrest Personnel would like to see a robust assessment tool that truly reflects the level of support required to achieve an employment outcome. For example, in the current

programme participants who achieve employment outcomes at level 2 funding and return to DES after leaving employment generally return to the programme with level 1 funding. For some cohorts this does not reflect the level of support required to obtain and maintain employment; and, due to the nature of their disability recent work experience will not affect the level of support that is required. We would like the assessment tool introduced to be sufficiently sophisticated to allow for situations such as this.

We would like to see some consideration of a financial incentive where providers have successfully addressed barriers to employment, for example supporting a participant with an intellectual disability to get their driver's licence. Transport is often a major impediment to Regional, Rural and Remote job seekers finding sustainable employment and more often than not there is no public transport available.

Determining Eligibility and Employment Outcomes for ESLs

Forrest Personnel supports the expansion of the Eligible School Leaver programme to a broader group of participants. Forrest believe that DES should be available to students who do not currently attract additional education funding due to their disability such as students with mental health diagnoses, potential job seekers who are on the autism spectrum and many other conditions.

Improved Gateway and Assessment Process

Improving the Gateway

Forrest would like participants entering DES to obtain a chronic disease plan from a General Practitioner that includes a Return to Work Plan. This would encourage greater cooperation between providers and treating professionals and provide a possible means of reducing the high proportion of participants on long term medical exemptions. A coordinated approach to recovery would benefit participants, government and providers.

Ongoing Support

Forrest Personnel supports the introduction of a fee-for-service model of Ongoing Support, particularly for participants with high support needs. We believe this will lead to improved employment outcomes for participants with significant barriers to employment.

Forrest Personnel would support the removal of flexible ongoing support.

Forrest Personnel believe that minimum levels of support should be specified.

Conclusion

Forrest Personnel welcomes the opportunity to be part of DES from 2018 and onwards.

In the development of the new model we encourage government to address the administrative burden on providers that diverts resources from helping participants find and sustain employment.

We would like to see some reform of the star ratings system to recognise service quality and the achievement of 'soft' outcomes, such as improved self-confidence and self-esteem, which are a critical step in the process of achieving "hard" outcomes; that is, "getting a job." Forrest believe that recognition of service quality will encourage service innovation and better outcomes for participants and government.

Forrest Personnel would like to see DES 2018 allow for indexation of fees. DES is a specialist programme that requires ongoing investment by providers to allow for staff development, service innovation and better outcomes for participants. Lack of indexation means effectively reduced funding from year to year and we believe this disadvantages people with a disability.

Forrest Personnel would like to participate in future consultation as part of an expert reference group and will provide detailed evidence, and examples, to support our position on how the new model should look.

We are happy to further discuss the contents of our submission.