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**Anglicare Australia
Submission to the
New Disability Employment
Service Model**

January 2022

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About Anglicare Australia

Anglicare Australia is a network of independent local, state, national and international organisations that are linked to the Anglican Church and are joined by values of service, innovation, leadership and the Christian faith that every individual has intrinsic value. With a combined expenditure of \$1.97 billion, and a workforce of 19,000 staff and 8,000 volunteers, the Anglicare Australia Network contributes to more than 50 service areas in the Australian community. Our services are delivered to 550,000 people each year.

As part of its mission, Anglicare Australia “partners with people, families and communities to build resilience, inclusion and justice.” Our first strategic goal charges us with reaching this by influencing “social and economic policy across Australia with a strong prophetic voice; informed by research and the practical experience of the Network.”

Contact

Kasy Chambers
Executive Director

Anglicare Australia
PO Box 4093
Ainslie ACT 2602
T: 02 6230 1775

anglicare@anglicare.asn.au

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Introduction

Anglicare Australia welcomes the opportunity to help shape the future of the Disability Employment Services (DES) program by taking part in the consultation on a new disability employment support model. Anglicare Australia is a unique national Network of independent, for-purpose community service organisations, all with links to the Anglican Church. Our Network members provide a wide variety of services to people with disability. In 2020-21, Network members provided disability support services to over 49,000 people, and one of our members is a large DES provider.

Reform of DES services is both urgent, and possible. Policy solutions are within our reach.

All people with disability who are able to work, and want to, should be supported to find meaningful employment. There are 2.1 million working age Australians with a disability. Although the overwhelming majority are in the labour force, the unemployment rate is roughly twice that of the non-disabled working age population.ⁱ Sadly, employment outcomes for people with disability have not changed for nearly three decades.ⁱⁱ Australia has one of the lowest employment participation rates for people with disability, when compared with other OECD countries.ⁱⁱⁱ This is a lost opportunity for people with disabilities, their families and communities, employers, workplaces and the economy.

Following the previous review of the DES a number of changes were made to the program, including granting DES participants the right to choose which DES provider they used. We are encouraged by the willingness and responsiveness of the Australian Government in implementing these recent reforms. There are, however, still significant structural issues with the DES program. The broader income support payment system that it operates alongside would also benefit from significant reform.

This submission provides recommendations aimed at improving the experiences and outcomes for people with disability in finding and maintaining meaningful employment.

The Disability Employment Services program

The DES program is the Australian Government's primary program aimed at assisting people with disability into work. It is targeted at people whose disability is their main barrier to work. Generally, to be eligible for assistance from a DES provider people must have a disability, injury, or health condition that presents a barrier to gaining employment, and have a Job Capacity Assessment or an Employment Services Assessment recommending they participate in the DES.^{iv} The program is funded by the Australian Government, and delivered by a mix of for-profit and not-for-profit service providers. About 20 percent of DES clients participate in the program voluntarily.^v For the remainder, their income support payments are conditional on DES participation, and failure to fulfil the requirements of the compliance framework means they may have their payments suspended or cancelled.^{vi}

The DES program is delivered alongside the Jobactive program, which is a mainstream service aimed at supporting jobseekers into work. Jobactive is also funded by the Australian Government and delivered by a mix of for-profit and not-for-profit service providers. Following a Jobs Capacity Assessment by Centrelink staff people are placed in one of three tiers within Jobactive, A to C. People in Tier C have the highest support needs and the greatest barriers to entering employment.

Labour market issues

There are 314,350 DES participants across Australia. Additionally, 26 percent of Jobactive clients have a disability.^{vii} These people with disability make up a high proportion of the nearly 1.2 million unemployed people in Australia, a figure which does not include people living on the Disability Support Pension who are willing and able to work, who are eligible to access the DES program. The most recent data from the Australian Bureau of Statistics show that there are 337,700 job vacancies.^{ix}

There are many more people looking for, or required to look for work, than there are jobs available. This disparity is more pronounced for people with disability who are hoping to gain entry-level jobs. Anglicare Australia's 2021 Jobs Availability Snapshot shows that jobseekers who don't have qualifications or experience to draw on outnumber entry-level vacancies by as many as eight to one. Further, people with the greatest barriers to work aren't getting these entry level jobs. They are competing with 27 other jobseekers for each one of these roles.^x Of course, not all people with disability are looking for these entry-level jobs, but the Jobs Availability Snapshot nonetheless serves to highlight the difficulties faced by jobseekers, many of which are compounded for people with disability.

The DES has been designed to help individuals with disability into employment. But it does not address the shortage of entry level and low-skilled jobs. Unemployment levels may be relatively low, but the same people who couldn't get jobs when unemployment was higher are still poorly represented in the labour force.

In addition, there is an insufficient demand-side response to growing the number of people with disability looking for jobs. This is compounded by the lack of knowledge, particularly among small- and medium-sized businesses, about existing assistance available to employ people with disability.^{xi}

Anglicare Australia believes that the Australian Government should be actively investing in creating entry level jobs in the open market, whether in its own ranks or by providing funding and leadership to create jobs elsewhere. State, territory, and local governments can all play a strong role in job creation.

Indeed, there are recent precedents that demonstrate the value of state, territory, and local government involvement in job creation. During the first wave of COVID in 2020, state and territory governments across Australia established funding programs aimed at stimulating employment. Some of these programs involved bringing forward planned spending, but others were direct job creation, for example in construction building new footpaths and repairing playgrounds, or in community services.

As well as these short-term responses to job losses associated with the COVID-19 pandemic, there are other, longer-term programs aimed at creating jobs. The Jobs Victoria Fund, for example, offers state-funded wage subsidies to employers who employ disadvantaged jobseekers.^{xii} But these programs lack the scale required to bridge the gap between the supply and demand for jobs for people with disability.

Dr Sue Onley and colleagues from the Melbourne Disability Institute note in their submission to the Department of Social Service's Consultation on the National Disability Employment Strategy:

"We cannot - and should not - rely on the private sector to bridge [the] gap between demand for and supply of labour and trust that people with disability seeking work will not be sidelined in that process. Entrenched and widespread unemployment for people with disability will have significant private and public costs...Government must play an active role in shaping the future labour market and ensure that people with disability are not sidelined in that process. We now have a chance to chart a different course. This new path must begin with recognising that persistent unemployment of people with disability is a structural and social problem as well as an individual one. Strategies and initiatives that respond to both are required."^{xiii}

Recommendation

Anglicare Australia recommends that the Australian Government fund programs to increase direct employment by local and state and territory governments for people with disability. These could include job creation programs at the entry-level, as well as incentives to improve employment rates among people with disability at all levels across the public sector.

Abandoning ineffective mutual obligation

Activity requirements for people out of work in Australia are among the strictest and most punitive in the world. Anglicare Australia remains concerned that these requirements for DES providers to administer and enforce mutual obligation requirements on behalf of Centrelink have negative consequences for jobseekers with disability, without adding any benefit. Disability Employment Service providers from the Anglicare Australia Network have advised that this requirement undermines their strengths-based approach to assisting people into work.

Anglicare Australia's recent research project, *Asking Those Who Know*, examined people's experiences of living on income support payments, including people with disabilities.^{xiv} Instead of supporting those who it is supposed to help, the current system is subjecting them to pointless tasks that do not help them find work. In many cases, the system makes it harder for people to look for work, and in others, it gets in the way of other activities that they find meaningful. At its worst, it adversely affects people's mental health and punishes people for minor errors – or for no reason at all.

It is also costly, with little benefit. Employment service providers, including DES providers, are paid enormous sums to breach and issue 'demerit points' to their clients, with no observable change to their job search outcomes. And there is no evidence this approach helps people achieve their potential or goals. Indeed, research published this year found that people forced into mutual obligation programs were *less* likely to gain employment than those who aren't.^{xv}

It is clear that "mutual obligation" is a punitive and ineffective approach to supporting jobseekers into work. It is not appropriate to outsource compliance to organisations whose job it is to help people. Requiring people with disability to participate in the DES program, or indeed Jobactive, when the ratio of job seekers to available jobs is so skewed is a nonsense. Instead of forcing people to live in poverty and participate in a punitive system of obligations and penalties, we need to accept the reality of the labour market. There are other, more meaningful, ways that both jobseekers and DES providers alike could spend their time.

The current approach of punishment and compliance that characterises all employment services in Australia, including DES, system should be replaced with a system that is tailored and person-centred. It should look more like the system that people with disabilities want, with less busywork and more genuine support, including support to turn short term jobs into lasting opportunities.

Recommendation

Remove all mutual obligation requirements for DES participants and make participation voluntary.

The DES market

Disability Employment Service and Jobactive providers operate within a marketised system of employment assistance to help people prepare for and find work. This approach began in 1994, and has been supported by Australian Governments since.^{xvi} One reason that employment assistance is funded is to respond to market failure. If employers made their own arrangements to assist people with disability into work there would be no need for them to receive assistance from a government-funded service.

Thin and oversaturated markets

Despite being funded by the Australian Government, the DES program does not address this market failure equally. DES providers are concentrated in major cities. Equally, there are few DES providers in many regional areas. During the preparation of this submission, Anglicare Australia spoke to one provider who said they would like to operate in more regional and rural areas, but that the DES business model meant this was not viable. As a not-for-profit they already redirected some of their surpluses into loss-making activities that they nonetheless felt were worthwhile, but they could not sustain opening additional offices in regional areas. They felt that people with disability in rural and regional areas could never expect the same access to DES providers as people in metropolitan areas.

The same provider also observed that “there are too many DES providers.” They told us that in some employment regions “multiple providers are going to the same businesses spruiking the program,” and that they “are also aware of instances where employers engage in a ‘bidding war’ between different DES providers to see who will offer the biggest wage subsidy or incentive to take on a worker.” These issues, while contradictory, are both caused by the marketised nature of the DES program.

Evidence gathered by the Melbourne Disability Institute backs up this observation. They found that some employers are “inundated by individual service providers wanting to build unsolicited relationships with them. Under existing arrangements, private providers compete for job placements to generate income.”^{xvii}

Employment assistance programs should be funded in a way that ensures all Australians have access to the help they need to prepare for, obtain, and sustain employment. Policy and practice models exist, and would work in the context of employment assistance programs. The NDIS, for example, has targeted initiatives to ensure that people in regional and remote areas have access to the services they need. The Disability Reform Ministers’ Meeting agreed in 2019 to adopt a more flexible approach to address market gaps in NDIS delivery. This includes market facilitation, direct commissioning, and an ongoing data collection program to ensure that people’s plans are being utilised and their needs met.^{xviii}

To respond to the issues of thin and, oversaturated DES markets, market stewardship is required. This could be achieved by direct commissioning of DES services in some areas, or through block funding for service provision to larger areas that must include regional centres.

Although it would not be suitable for all DES participants, another option for people living in thin DES markets would be to allow them to use DES providers outside their area without having to first meet face to face, as the current rules require.^{xix} This approach would also be useful for people who require or would prefer specialist support that may not be offered in their area, even if they are in a metropolitan area.

Recommendation

Anglicare Australia calls on the Australian Government to adopt a stronger market stewardship role that addresses thin and oversaturated DES markets. This would include allowing people who live in “thin markets”, such as regional and remote areas and those with special support requirements, to access DES providers from anywhere in Australia without having to first meet with them face to face.

Better connecting employers to employees

Despite a broad willingness on the part of employers, there has not been any real shift in the percentages of employers actively engaged in employing people with disability in recent decades.^{xx}

Employers are reluctant to use the Australian Government’s dedicated disability employment website, JobAccess. There may be an element of stigma, and misconceptions about workers with disability, however it is clear that many employers simply do not know that support, such as that offered by JobAccess or through DES providers, is available to them. The Department of Social Service’s own consultation paper on the National Disability Employment Strategy noted that:

“A consistent theme throughout the research and stakeholder feedback was a perceived lack of information, advice and guidance about hiring, re-engaging or providing ongoing support for a person with a disability. Employers are not accessing the information and support they need to build their confidence and make their workplace accessible. Awareness of existing Government initiatives, including JobAccess and the Employment Assistance Fund, is fairly low. More needs to be done to promote the range of programs and services available to employers. Feedback indicated employers need simple and easily accessible advice, strategies and resources, developed by people with disability. Further, employers prefer accessing information from trusted sources they already access, including their peers and industry and peak bodies.”^{xxi}

Instead of a widespread understanding of the supports available to employers who would like to employ people with disability, there is an atomised approach to building relationships between DES providers, employers, and people with disability who are looking, or being forced to look, for work. Anglicare Australia is supportive of the relationships that DES providers build with employers and more broadly within the communities that they operate, however this would be much better if it was

supported by an information aimed at increasing public awareness of DES providers and the supports that are available for employers and jobseekers and employees with disability alike.

At present there is information for prospective employers of people with disability on the JobAccess website, including a page on the National Disability Recruitment Coordinator.^{xxii} The Human Rights Commission also has a useful website called Includeability that provides information for employers.^{xxiii} While useful, these resources are not well known and hard to find.

Anglicare Australia supports Disability Employment Australia's call to establish a Disability Employment Centre of Excellence to "house evidence-based best practice and act as the conduit for employers seeking to employ people with disability, including an employer taskforce with an aggressive time-framed goal to introduce, or at the very least trial, some of the many evidence-based recommendations [aimed at increasing employer engagement]." Such a centre could serve as a 'one stop shop' where employers could access information, guides, share stories and best practice, and connect with DES providers. Much of this content already exists, however isn't being accessed.

The establishment of this Centre of Excellence would need to be accompanied by a well-resourced campaign to increase employee and employer awareness of the types of supports available to assist people with disability into work.

Recommendation

Anglicare Australia recommends:

- Establishing a national disability employment centre of excellence.
- Funding a campaign to increase employee and employer awareness of the types of supports available to assist people with disability into work.

Participant interaction with DES providers

Anglicare Australia believes that the DES should be open to everyone who is on a Disability Support Pension, all of the existing Jobactive clients who have a disability, and anyone who obtains a medical certificate stating that their disability is their primary impediment to accessing work, regardless of whether or not they receive income support payments or an NDIS package.

However, Anglicare Australia is concerned about how the New Employment Services Model (NESM) will be rolled out, and what it will mean for people with disability who are looking for work and DES providers alike. We do not know how many people who would currently be offered support through a DES provider will now be offered “enhanced services” under the NESM. There is a risk that the “enhanced services” stream within NESM will become a *de facto* DES service. This would not be appropriate. Disability Employment Services specialise in assisting people with disability into employment. Unless a person with a disability wants to use a particular Jobactive service, they should have the option of using a DES provider who can provide more appropriate assistance. As it stands, significant numbers of people with disability are already forced to use a Jobactive provider rather than a DES one.

Anglicare Australia is concerned that the significant additional automation that is proposed as part of the NESM will fail to provide the best assistance to job seekers. At worst, it might cause harm. Existing AI decision-making in Commonwealth human services agencies is not transparent. We have particular concerns about the impact of AI decision making on income support payment recipients.

The source code, algorithms, and decision-making trees that will be used in the NESM have not been published to date, and there are no plans that we are aware of to publish them once the NESM rolls out. We are concerned that people will not know how or why NESM automated decision making has streamed them into a particular jobseeker classification or program. Removing human decision making will almost certainly make appealing poor decisions even more difficult.

Recommendation

Anglicare Australia recommends:

- A broadening of the eligibility for the DES program, and include all existing Jobactive clients assessed as having a disability.
- Decision making regarding a person’s placement into an employment assistance service to be made by, or reviewed by, a person.
- The source code, decision making trees, and algorithms used in any automated decision-making processes to be made public.

Participant choice

Anglicare Australia welcomes the changes made by the Australian Government in 2018 which allow DES participants to choose their own provider. Such choice and control should also be extended to Jobactive clients.

As noted above, we also support people with disability being able to choose a DES provider that is not in their region. We believe that this would encourage healthy competition across a broader range of DES providers, and allow people to access a provider that specialises in helping people with their particular type of disability or background.

Recommendation

Anglicare Australia recommends:

- Allowing Jobactive clients to choose their own Jobactive provider, rather than being assigned one.
- Allowing people to access DES providers from anywhere in Australia without having to first meet with them face to face.

Young people and early intervention

Young people with disability are disadvantaged by having limited access to DES services. People in their final year of school who have a “significant disability” are eligible to access the program, as are young people transitioning from an eligible state or territory transition to work program or School Leaver Employment Supports.^{xxiv}

For many students, participating in the DES program in their final year of school may not allow enough time, in between other study and commitments, to feel confident and ready to enter paid work the following year. Many others would benefit from receiving support from a DES provider earlier.

The structure of the DES program is based around working with individuals, however a program that targeted a group of young people, all the while ensuring the person centeredness of the program would likely deliver value in terms of job-readiness and employment outcomes for young people with disability, as would the opportunity to engage with teachers, parents and carers of young people with disability. Indeed, one of Anglicare Australia’s members, EPIC Assist, previously operated such a program, and report that it was a success. This was self-funded, and they are sadly no longer able to operate it.

DES providers are expert at helping people with disability into work, and provide crucial linkages between their clients and potential employers. Their closer integration with education providers and young people at school would benefit all concerned with the employment outcomes and life opportunities of young people with disability.

Anglicare Australia supports People With Disability Australia’s call to allow all people with disability to access DES supports from the age of 14, including casual and part-time work, and for work placements and post-placement support.^{xxv}

Allowing DES providers to work with young people *before* they have begun to try and find work after school is a sensible approach, and should be viewed as an investment. In any case, the young people who would benefit from early access to DES providers while they are still in school are likely the

same people who will be referred to a DES provider following a Jobs Capacity Assessment or an Employment Services Assessment two or three years later.

Recommendation

Anglicare Australia recommends expanding eligibility criteria for the DES program to include people aged 14 and over, including those who are still in full time education.

Ongoing support from DES providers

Many people with disability will not require ongoing employment assistance once they have secured a job, but many others will benefit from ongoing, if periodic, assistance. Some employers may also benefit from ongoing support and engagement. This can involve partnerships with people’s families and support networks, not just the job seeker. One problem with the existing structure of the program is that DES providers are not able to work with people who already have a job. If a person with disability is unsuited to or unhappy in a job or ready for some progression, they cannot seek assistance from a DES provider to help find another one. They must instead go back to the beginning of the process, which also means leaving the job they are in.

Anglicare Australia believes that the DES program should be expanded to encourage and facilitate longer-term engagement with clients to achieve the best job outcome for them. We have heard from DES providers that the current structure of the program encourages DES providers to assist people into a job that may not suit them best, or that they may not like and therefore may not be able to sustain long term. This allows them to “get clients off the books”, while still collecting the bonus payments for getting them into work, and hopefully supporting them to stay long enough to collect the first bonus payment, which they receive once a person has stayed in a job for 13 weeks.

Anglicare Australia calls on the Government to expand the DES program’s guidelines to include people already in jobs. This would allow DES providers to work with clients who are in work, and their employers, to assist them with ongoing professional development, transitioning into new roles, or anything else that would help them maintain long term, ongoing and sustainable fulfilling employment.

Recommendation

Anglicare Australia recommends funding DES providers to commence or continue supporting people with disability who are already in paid work.

Star rating system

DES participants can choose a provider based on a number of factors. These may include geographic proximity, a recommendation, information on the provider’s website, or even by “interviewing” providers. They may also use the star rating system, which is managed by the Department of Social Services and is designed to provide information about the relative performance of different DES providers.^{xxvi}

Anglicare Australia believes that the current metrics for awarding bonus payments and star ratings are unhelpful and form a poor basis for comparing and contrasting quality DES providers. The current star rating system awards ratings based on how quickly a client is assisted into work, and whether they stay for 13 and 26 weeks. This does not measure the amount of time and consideration a DES provider expends helping a client feel confident and ready to work, and finding the right job. It does not measure the degree of professionalism with which they approach this task, nor does it account for the variance in needs those particular types of clients may have.

If a DES provider chose to focus, for instance, on assisting people with anxiety disorders, they may not be rewarded with a high star rating. This is because it may take much longer for these clients to find work, as the first priority for this theoretical DES provider would not be to get them into work, but rather to work with them for as long is necessary so that they are confident enough *to* work. Not all barriers can be fixed with assistive technology or making changes within a workplace.

Some clients with these types of psychosocial disability may not end up entering the workforce, despite the time they may have spent as a client of a DES provider. This should not, however, be seen as a failure on the part of the DES provider. Indeed, their time spent supporting the client might have helped them with other things in their life, such as having a phone conversation with a stranger. In addition to their intrinsic benefit to people, such outcomes are essential to being able to more fully participate in the life of the community, and to becoming 'job ready'. Providing clients with the right supports, and taking the time required to deliver them, will ensure they have a greater chance of long-term success in the workforce.

The star rating system can unintentionally encourage providers to "cherry-pick" clients with less complex needs, who they will be able to assist into work more easily.

The star rating system also offers up some other surprising results. Some providers that operate across different areas score wildly divergent star ratings depending on the area. It is possible that people operating in different offices of the same DES provider would provide differing levels of support to clients. But these differences in ratings may also reflect more on external factors, such as the local labour market, or client characteristics demonstrating the inadequacies of the star rating system.

A better way of measuring the performance of DES providers would be to ask the clients themselves. Rather than focusing on how long it took to get into a job, or how long they kept it, it would be helpful to know whether they were treated with respect, or how well their particular needs were taken into consideration. Likewise, it would be helpful to ask employers about their experience of dealing with a particular DES provider.

This data collection would not need to be onerous. To avoid hearing only from 'squeaky wheels', Anglicare Australia would support incentives for DES participants to participate in such data collection.

Recommendation

Anglicare Australia recommends redesigning the existing star rating for DES providers so that it includes weighted data about the experiences of DES provider clients and their employers.

Wage subsidies

Wage subsidies are available to support employers who hire people with disability. They are paid directly to the employer, but they are only paid up until the first 26 weeks of a person's employment.^{xxvii} Perhaps not coincidentally, the number of people who stay employed between 13 weeks after their job placement and 52 weeks after placement drops dramatically. For both Disability Management Service and Employment Support Services clients this number almost halves (from 2,040 to 1,073 and 2,257 to 1,272 respectively).^{xxviii}

Anglicare Australia believes that wage subsidies, where needed, should be ongoing, and be set based on the support needs of individual employees with disability. In some situations, a wage subsidy will be helpful while a person is 'learning the ropes' at a workplace, but they should not be suddenly dropped off. A gradual tapering would still help the employer. A sudden end to a subsidy, however, will provide a financial shock to many employers, and may, if inadvertently, contribute to someone losing their job.

Recommendation

Anglicare Australia recommends reconfiguring the existing wage subsidy program with a view to improving the longer-term sustainability of DES participants' employment.

Conclusion

Anglicare Australia thanks the Department of Social Services for the opportunity to make this submission. All people with disability who are able to work, and want to, should be supported to find meaningful employment, and the existing DES program provides a solid foundation to build on. This goal can only be achieved, however, if substantial changes are made to the architecture of the DES program.

The DES should be accessible to all working age people with disability, whether they are in work and looking to change jobs or upskill, looking for work, still in school, or receiving an income support payment. All people with disability should be able to access DES providers, rather than the current practice of streaming many people with disability into the mainstream Jobactive program. Punitive measures, such as forcing people with disability to participate in the program, or the use of “mutual obligation” policies, including payment suspensions, have no place in empowering people with disability, and are not effective in helping them to achieve their employment goals.

There also needs to be attention given to supply side measures that will increase the number of jobs available for people with disability. The current policy and funding focus at the national level is too skewed towards demand side measures. Having people with disability job ready is only half the story if there are no jobs for them to go to.

The marketised nature of the DES presents some challenges, including the current situation of oversaturated and “thin” markets, and these need to be addressed through market stewardship by the Australian Government to ensure that all people with disability, no matter where they live, can access DES services. People with disability also need to be able to make informed choices about which DES provider will best suit their needs. The current star rating system is not fit for purpose, and needs to be replaced with a system that includes weighted data about participants’ experiences of working with different DES providers.

Anglicare Australia would welcome the opportunity to discuss further this submission.

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