



Consultation Secretary  
Disability Employment Reforms Branch  
GPO Box 9820  
Department of Social Services Canberra ACT 2601  
By email: [DESconsultation@dss.gov.au](mailto:DESconsultation@dss.gov.au)

22 December 2021

Dear Colleagues,

### Re: New Disability Employment Support Model

Council of Single Mothers and their Children Inc. (CSMC) is a non-profit organisation founded in 1969 by single mothers to secure a better life for women parenting alone and their children.

We provide specialist support services including:

- Information, support, referral and advocacy services to single mothers, including support via telephone, email and messenger to over 2200 contacts per year through our 'Support Line'.
- Accurate information and resources to single mothers and our 4500 single mother members, including regular email bulletins and via our website.
- Representation of the needs and issues of single mothers and their children by working with government and community organisations, the media and research partners.
- Advocacy to overturn social and economic discrimination against single mothers and to raise the status of single mothers and their children.

While we are not a disability service, our national survey of 1112 single mothers show 40% have a disability. Applied to our membership, this means as many as 1784 women may have a disability. Data from our service delivery show mental health and disability concerns are regularly in the top ten presenting issues to the Support Line, along with concerns and issues relating to mutual obligation programs.

We are pleased to have the opportunity to share with the Committee some of the experiences of single mothers contacting us and insights from our research. We answer only the questions where we believe we may make a valuable contribution.

Regards,

**Jenny Davidson**  
Chief Executive Officer

CSMC  
Level 1, QVWC  
210 Lonsdale St  
Melbourne Vic 3000

Administration  
T 03 9654 0327  
F 03 9654 0328  
E [csmc@csmc.org.au](mailto:csmc@csmc.org.au)

Support Line  
T 03 9654 0622  
Outside Melbourne  
1300 552 511

W [csmc.org.au](http://csmc.org.au)  
[facebook.com/  
councilofsinglemothers](https://www.facebook.com/councilofsinglemothers)  
ARN A0014618W

## Recommendations

1. That the DES program be open to any person with a disability or chronic health condition seeking assistance to find work; and that the redesigned program is able to accommodate the different circumstances, strengths and needs of clients, and staff are well equipped to recognise and respond to these.
2. That the particular needs of minority groups within the whole cohort are investigated and strategies developed to accommodate these; this includes the specific needs of parents, single parents, First Nations peoples, those from culturally and linguistically diverse backgrounds, those from all disability and multiple disability types, and those whose sexuality or gender may pose specific issues in workplaces.
3. That all DES services and staff are aware of the high levels of family, sexual and other forms of violence, trauma, and discrimination experienced by people with a disability in Australia and that accordingly, all strategies are trauma informed and all staff have training in trauma informed practice.
4. That the government recognize the public benefit in providing a high quality, voluntary employment and employment support service for people living with a disability in Australia regardless of their income source or status, and that this recognition inform structural and resourcing decisions.
5. That DES be uncoupled from mutual obligations and the targeted compliance system; participation be voluntary; and the program be redesigned to be of significantly higher quality.

## 1.1. Who should be able to access a disability employment support program?

In our view, anyone with a disability who requires assistance to access the labour market should be able to access a DES program. As there is such a high level of public benefit involved in the successful employment of people with a disability, we urge easy access to the programs and high-quality engagement.

Whilst the Consultation paper acknowledges that “People with disability experience different challenges when seeking employment”,<sup>1</sup> statistics on disability provided do not include any on those who people with a disability who are also parents. Ramifications of this, along with a lack of considerations of sole parenting and gendered sole parenting, may result in a profound lack of understanding of the structural barriers to employment and the kind of supports disabled single mothers are likely to require. Such barriers may include prejudice against working parents with a disability, or against single parents generally, or an unsafe workplace. Additional supports to be considered for these cohorts include childcare or support to get children to and from school, with allowances for the time these take.

In a 2018 National Survey of Single Mothers undertaken by Council of Single Mothers and their Children, 878 respondents answered the question: “Do you have any long-term health condition, impairment or disability that restricts you in your everyday activities and has lasted or is likely to last for 6 months or more?” 40% answered yes.

A high percentage (although the figure is unknown) of single mothers have experienced family violence which includes long term injuries that result in disabilities and thus, this is a group that must be properly accommodated. Work by the Brain Injury of Australia shows that over a decade, “Fifty-nine per cent of females (of all ages) attending major trauma (in a Victorian hospital) for reasons of family violence had a brain injury”.<sup>2</sup> The same report showed that in a ten-year period, of victims of family violence who attended Victorian hospitals, forty per cent had sustained a brain injury; thirty-one per cent of those victims were children, twenty five per cent of whom had sustained a brain injury. These are repercussions that will ripple through these families' lives in the long term. Other relevant repercussions of family violence include mental ill-health, PTSD and other trauma impacts, all of which may significantly affect the capacity of the woman to work. Combining this along with other evidenced work about the high rates of sexual abuse experienced by women with a disability both in the workplace and elsewhere, we highlight the importance of specialised support for single mothers and other women in disability employment services, to reflect the demand felt within our community.

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<sup>1</sup> Page 7, Consultation for Disability Employment Support Model

<sup>2</sup> Brain Injury Australia: The prevalence of acquired brain injury among the victims and perpetrators of family violence. Prepared in response to Recommendation 171 of the Royal Commission into Family Violence.

## 1.2. Should a future disability employment support program include employment pathways such as casual and part-time employment, community engagement, voluntary work and short-term unpaid work experience?

**Short-term unpaid work experience** should never, in our view, be an option in this program. A competent employer can assess potential and has available to them the option of not proceeding with the contract if a new employee does not measure up during their probationary period. Unpaid work experience is not accompanied by any industrial protections and renders already disadvantaged people vulnerable to unjust practices.

**Permanent part-time work** is a valuable option for many single mothers and people with a limited capacity to work and should be an essential part of the suite of offerings. It should however be accompanied by realistic assessment of a sufficient income and, where the income requires supplementation, this should be automated without requirements beyond notifying Centrelink of any changes. See 'Sources of income' in our 2018 report which details the complex interactions between part-time wages and government income.<sup>3</sup>

**Casual employment** suits some people but by its nature is rarely of long-term benefit and, as demonstrated in the pandemic, can lead to massive and sudden unemployment in some sectors. This would ideally not be supported as an option by the program. We know however that for many people, including people with a disability who are parents and some re-establishing themselves after separation or family violence, the need to maintain maximum flexibility to accommodate their health or sole parenting responsibilities, casual work is a valuable option. We therefore think it should be supported if it is preferred by the individual, but not be pushed as a preferred option.

**Volunteer work:** The Department is correct in acknowledging the important role volunteer work has within our labour force and society in Australia, and CSMC acknowledges and encourages volunteer work within our own functions. We do not, however, support the binary option posed by the Department that disabled single mothers' choices are limited to either paid employment or unpaid volunteer work.

During the COVID-19 pandemic, the Grattan Institute found women "were more likely to lose their jobs, and less likely to get government support".<sup>4</sup> Furthermore, the Institute report found "remote learning and the loss of formal and informal childcare and household support services led to a big rise in unpaid work during the lockdowns. This unpaid work was disproportionately borne by women, and many found it impossible to juggle with their existing paid work commitments".<sup>5</sup> Lastly, the Institute reported that "Mothers in couples, and single parents (80 per cent of whom are women), were more likely to leave the labour force than other groups. For single parents, paid hours remain substantially below pre-pandemic levels".<sup>6</sup>

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<sup>3</sup> Andi Sebastian and Irit Ziv: **One in eight: Australian single mothers' lives revealed**. Report of a national survey undertaken in 2018 by the Council of Single Mothers and their Children. 2019 pgs 13-14 Available at: <https://www.csmc.org.au/publications-on-single-mother-issues/>

<sup>4</sup> Wood, D., Griffiths, K., and Crowley, T. (2021). *Women's work: The impact of the COVID crisis on Australian women*. Grattan Institute. Grattan Institute, page 3.

<sup>5</sup> *ibid.*

<sup>6</sup> *ibid.*

Given all this, CSMC recommends that volunteer pathways remain the choice of the individual only and that only when voluntary work is their choice and preference, it is supported. There is an important role for the DES program to provide guidance to volunteers to enable constructive development of skills from their volunteer engagements, and this should include training and support to effectively develop their own networks for future employment opportunities.

CSMC stresses the importance in acknowledging the unpaid work already undertaken by women in Australia, a strain felt even more acutely by single mothers. Lastly, the acknowledgement of financial stress that women in Australia are already under following labour force influence from the COVID-19 pandemic must be considered in discussion of volunteer work capabilities and opportunities.

### 1.3. How can a future disability employment program better align with other programs such as the New Employment Services Model and the Community Development Program?

CSMC acknowledges the need to review current Employment Services Models, and applauds the work already implemented in the New Employment Services Model. We strongly support the Department's intention to develop a strength-based approach to disability assessments rather than the current model, being deficit-based. In light of this goal, however, we see the proposed "Points-Based Activation System" (part of mutual obligations under the New Employment Services Model) as regressive.

In our view this system will not provide quality support to single mothers who have a disability and are seeking employment. As far as we can see, "parenting", "sole parenting", "therapy appointments" etc, do not, unlike study or other commitments, reduce the points target. While we do not have significant expertise in the application of this system, we are bothered by stories from our callers about how hard it is to have the system understand their lives. We urge consideration of ways to ensure that the DES is configured in ways that adequately accommodate the needs of disabled single mothers (and others with a disability) in their ordinary lives.

We also recommend strong consideration of research that demonstrates that systems such as "mutual obligation", "points-based activation", and "targeted compliance" are counter-productive in assisting participants to find meaningful and sustainable work.<sup>7</sup> In our view, this question of mandatory engagement is critical to the future success of the DES. Compelling people to participate in employment-based services is not based on evidence of success and our experience, like that of many other organisations, is that the levels of stress engendered by compulsion, significantly reduces any benefit.

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<sup>7</sup> See for example: Ruud Gerards & Riccardo Welters (2021): Does eliminating benefit eligibility requirements improve unemployed job search and labour market outcomes?, Applied Economics Letters, DOI: 10.1080/13504851.2021.1927960 To link to this article: <https://doi.org/10.1080/13504851.2021.1927960>

The greatest incentive to engage, is a quality program that is person-centred, trauma-informed and strengths-based. One that works with groups of people, with motivational and expert guest speakers, provides opportunities to network, and to experience a range of employment opportunities and focuses on the person's journey, rather than ticking off an employment circumstance regardless of suitability.

On the basis of this, we recommend the DES should be uncoupled from mutual obligations and the targeted compliance system, that participation should be voluntary and that the program must be of significantly higher quality.

## 6.0. How do we best tailor mutual obligation requirements to increase the likelihood of people with disability finding work in the future?

As highlighted above, Council of Single Mothers and their Children views mutual obligation requirements as barriers to the finding of long-term satisfying work. People with disabilities and/or chronic conditions have never demonstrated the collective desire to be considered outside mainstream society. A long history of stigma and discrimination has created the divide and we contend that mutual obligations serve only to reinforce this history of exclusion in the job search and market, between participants, non-participants, and providers.

Mutual obligation requirements have been documented as causing undue stress on participants, and evidence suggests that job service providers themselves are often unwilling to be involved in the compliance of mutual obligations. The existing framework of mutual obligations, including compliance and pre-designed assessments, tasks and activities, do not support disabled and chronically ill people in their journeys to find work. CSMC finds mutual obligations to be inappropriate to apply to chronically ill and disabled people, and we strongly recommend they are abolished entirely. CSMC recommends that the DES becomes a voluntary system in which participants are not forced or unduly pressured into specified activities and obligations, and in which participants are able to be individually and fully supported in their differing needs and goals.

Our experience shows that requiring participants to routinely undergo "point-based tasks" or "activities", rather than tasks that genuinely promote learning and skills growth, leaves single mothers feeling overwhelmed and less competent than when they began. All our work with single mothers in this and other compliance-based programs demonstrates the need for those who are financially vulnerable to have high quality opportunities and assistance to find and use their strengths to improve their own lives. Single mothers are some of the most 'time poor' members of our society and those who have a disability and/or are raising one or more children with a disability, even more so.

## Conclusion

In summary Council of Single Mothers and their Children strongly supports the implementation of these recommendations in the proposed New DES program.