



A CASE FOR DEFERRAL

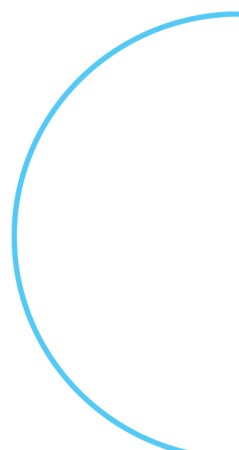
Discussion of Member Concerns for the Disability Employment Support Model

21 December 2021

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Jobs Australia



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Thank you for the opportunity to make this submission on behalf of Jobs Australia's Members.

Yours sincerely,



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Jobs Australia acknowledges the traditional owners of country throughout Australia and their continuing connection to land and community. We pay our respects to them and their cultures, and to the elders both past and present.

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1. ABOUT JOBS AUSTRALIA

Jobs Australia is the Peak Body for Not for Profit Employment Service Providers including organisations delivering the current Disability Employment Services (DES) program. Jobs Australia supports the largest network of Not for Profit Members who provide diverse employment services and pathways, education, training and skills development and community and social services. Because of the range and depth of our experience in Employment Services Policy and Programs and the accumulated expertise of our DES Member providers, Jobs Australia is uniquely positioned to contribute value to this project - the success of which is most critical to registered people with disability, and we recommend more broadly, to all Australian people.

2. ABOUT THIS SUBMISSION

The views expressed in this submission are the views of Jobs Australia.

3. EXECUTIVE SUMMARY

This document is Jobs Australia's response to an invitation from the Department of Social Services (DSS) to contribute to the Public Consultation paper for Disability Employment Support Model (DES).

One in five Australians, or around 4.4 million people, live with disability. Of these, 1.4 million people have profound or severe disabilities.

Currently people eligible for DES include those with a disability, injury or health condition that will last for more than 6 months. As at 30 September 2021 there were more than 310,000 people participating in the DES Program. There are currently 224 DES providers delivering services from over 2000 sites.

The following summary represents our Members position:

1. Jobs Australia Members recommend the current program is extended by at least 12 months.
2. Jobs Australia Members are disappointed that the DSS paper provides questions which seem to indicate Policy and changes to the current program are complete. Questions in the Discussion Paper appear to be designed to confirm, not to inform.
3. This Paper contains sampled advice from Members indicating current opportunities to improve aspects of the program and the relationship with DSS.
4. We recommend DSS takes the opportunity to work closely with DES Providers in

2022 and addresses a range of concerns, including performance evaluation, professional relationships and collaborative effort.

Discussion:

People with disability experience different challenges when seeking employment. These challenges may be shaped and compounded by factors like disability type and age, or whether a person is LGBTQIA+, lives in a rural or remote area, or belongs to a First Nations or culturally and linguistically diverse community.

Jobs Australia Members observe the further distance from cities, towns and regional centres - the less available and accessible are Disability Services. There are numerous examples where there are no DES Program. Members advise there are few, if any, active DES Programs on the hundreds of remote-located Indigenous Australian communities across Western Australia within CDP regions, and we understand the same for Queensland, South Australia and Northern Territory. Whilst CDP providers 'know about' DES and services, few have much effective knowledge of any component other than the program name.

People with disability need different supports to help find work and maintain employment and build a career. Placing people with disability into work is a complex process and is dependent on the nature of the employment opportunity and the disability type.

In this paper, Jobs Australia refers to four (4) categories of disability:

- Intellectual
- Psychological
- Sensory
- Physical

Not every person with a disability needs specialist help. There are a small number of people with disability who find work without any disability-program related support and it is logical to assume the nature of their disability is either of low impact to their functionality or is able to be managed so any impairment is low. Members advise this is not common, and the dominant number of people with disability require employers to provide individualised adaptations or more intensive support, and that the Provider is instrumental in establishing and maintaining the person in their employment.

Jobs Australia and its Members do not support the streaming of people with disability into the New Employment Services Model (NESM) and is concerned that to do so, may present additional challenges to jobseekers and Providers – especially after the six (6) months period for participation in NESM and when the job seeker can return to Provider face to face services.

Jobs Australia recommends face to face servicing is important and should not be removed for people with disability. Members are concerned about the loss of important social aspects of face to face servicing, whilst also recognising the professional imperatives delivered through this method. Face to face servicing is critical to jobseeker confidence, their sense of focus, purpose and employment. We point out that many people with intellectual and learning disability (IALD) cannot use smart phones, computers and associated IT tools.

Jobs Australia Members are clear. The NESM is not to be considered a ‘one-size-fits-all’ solution for people with disability.

Great care needs to be taken with reviews of the JSCI and ESAt processes and other methodology when filtering people with disability into NESM – or into any employment service.

Jobs Australia Members advise not every person in the DES Program is ready or capable of securing employment. Participation in community engagement, volunteering or short term unpaid work can deliver skills and experience as a tailored pathway towards obtaining meaningful employment. Community engagement or volunteering may help address the shortage of volunteers across some sectors, whilst providing opportunities for people with disability to build networks and future employment.

Jobs Australia Member Response:

“Unlike many so called ‘generalist’ programs – DES is not a one size to fit all program. That is its strength and lately perhaps its weakness, because to be effective in this space you also have to be equipped to deliver specialist services. You simply cannot roll up the DES program and park it into jobactive, or into CDP”.

4. CHANGES AHEAD – EMPLOYMENT SERVICES FOR PEOPLE WITH DISABILITY

Employment Services Programs in Australia are part-way through a period of substantial reformation. The CDP is under review, and jobactive already has been reviewed. This period of change is driven in part by Federal Budget containment following COVID-19 stimulus and other unplanned events, and a desire to alleviate the cost of Employment Programs, in particular program-related Employment Placement.

It is noted by Boston Consulting Group that although DES costs have increased, the extent of DES Program outcomes as a result of additional costs are not so clear. Advances in

Information Technology (IT) and the capability for complex applications to be delivered and used on personal smart phones and other communication devices now enables “anywhere any time” access – at least where there is wi-fi and cellular coverage.

An opportunity exists through the NESM for government to have a direct relationship with job seekers without disability, and it is this opportunity which causes concern.

Jobs Australia Member Response:

“It makes sense for jobactive. If you have a high functioning person who does not need face to face servicing – perhaps NESM is a logical fit for them. But anyone else – no. We do not recommend it and you know – the results will show it will not work if they try. Disability Employment Services cannot be delivered without the Provider.”

Under the existing Employment Services models, people seeking work are required to engage with Employment Service Providers (ESP) and to follow co-developed individually tailored pathways that lead to employment readiness and hopefully, employment.

Jobs Australia Members recommend this model must remain key to the delivery of DES, and that NESM is not an appropriate program for people with disability.

5. THE DES PROGRAM REVIEW – ESAt and the JSCI

As with CDP and jobactive programs, reviews of the Disability Employment Services program are underway. In mid-2020 Boston Consulting Group (BCG) reviewed the ESAt Process and identified savings of between \$20 and \$90 million if the process was implemented consistently and reducing referrals to DES by up to seven percent (7%). The emphasis is clearly an economic one.

The Job Seeker Capability Index (JSCI) is the initial point of referral into Employment Services Programs. The JSCI can be fulfilled by the Participant and typically, it is not until the participant indicates they present with a disability (and provides supporting medical/professional evidence) that the ESAt can be commissioned.

Members referred to examples when they were able to converse and work with ESAt reviewers as a component of best addressing the disability (or disabilities) the person presents. This is because the nature and extent of disability/ disabilities and their associated barriers become more apparent in the weeks following referral and commencement. Members are concerned this opportunity does not exist with the same level of frequency and believe the opportunity to maximise supports for participants is compromised.

Jobs Australia Members wonder at the potential the impact on people with disability who might be looking for work.

A Jobs Australia Member enquired - “if a person identifies with a disability in their JSCI – and has evidence to support that – does the BCG advice infer that the ESAt might negate that qualification?”

ESAt is an important device, used in conjunction with the Job Seeker Capability Index (JSCI) to further identify and inform on a person’s ability to respond to levels of support (and the levels with DES program) required to best suit that person. The most accurate and effective ESAt is one produced with the jobseeker, the ESAt specialist and the provider. This is because the Provider can further inform the process used by the ESAt specialist.

The Job Seeker Capability Index (JSCI) is the initial point of referral into Employment Services Programs. The JSCI can be fulfilled by the Participant and typically, it is not until the participant indicates they present with a disability (and provides supporting medical/professional evidence) that the ESAt can be commissioned. Members referred to examples when they were able to converse and work with ESAt reviewers as a component of best addressing the disability (or disabilities) the person presents. This is because the nature and extent of disability/ disabilities and their associated barriers become more apparent in the weeks following referral and commencement. Members are concerned this opportunity does not exist with the same level of frequency and believe the opportunity to maximise supports for participants is compromised.

The BCG review further recommended:

- Improving the delivery model so that participant and employer needs are better met.
- Creating an integrated government approach to the provision of disability and employment support.
- Addressing the sustainability of the DES program caseload and expenditure.
- Ultimately, improving the number and quality of employment outcomes for people with disability.

This Submission is in part, an opportunity arising from that review.

6. PROVIDER PERFORMANCE AND THE STARS RATING SYSTEM

Although widely discussed and frequently in less than measured terms, the Stars model is regarded by many Members as a counter-productive device and one which reduces the quality of the relationship between Department and Providers.

Continued verification of the Stars methodology is provided by actuarial firm Taylor Fry.

Performance ratings through Stars are essential for ESP leadership to refine their delivery in response to audited performance. The Ratings are typically and historically, late. The metrics are frequently unable to be understood and are opaque in nature. The regression model of comparing performance in one ESP in one region against assumed look-a-like ESP represents an effort to diminish high quality performances. Recently this view is supported when a Provider performed beyond 30% above the national average and yet received a negative performance rating in an environment where smaller branch office providers and is unable to determine the causal reasons. The Stars rating, their late release and the limited time to appeal ratings undermines what needs to be a collaborative and positive professional relationship with DSS.

Jobs Australia DES Provider Members appreciate the government is well aware of the issues and is taking steps to rectify the inadequacy of Stars. Members advise there is a need for an uncomplicated, transparent, easy to understand and easy-to-perform against set of Key Performance Indicators.

In August 2021 Minister for Families and Social Services, Senator The Honourable, Anne Ruston advised:

“A new DES Star Ratings system is also being developed to make performance levels more transparent for participants and providers and enable participants to make a more informed decision when it comes to their choice of provider”.

“We are also introducing new measures from January 2022 that support the needs of employers and jobseekers with disability, such as expanding choice for jobseekers and prioritising investment in education placements for training courses to target recognised skill shortages in the labour market”.

7. WHERE WE ARE NOW

In October 2021 Providers were issued with a Discussion Paper inviting responses from a wide range of participants (including ESP). The Discussion Paper provides nine (9) sections with information and guided advice. Each section includes a statement from the issuer and associated questions – for which respondents may elect to use information provided or elect to respond from the benefit of their individual and unique experiences.

Jobs Australia Members have expressed some disappointment at the design of the Discussion Paper. Jobs Australia understands a few Members have elected not to respond, given their views that the nature of the Discussion Paper and its questions appear (to some) that the design of the program is pre-determined. Jobs Australia observes an approach taken by the questions in the Discussion Paper easily leads to responses being selected from the provided text. It was hoped that discussion might be to the Policy settings and not only the operational layers of the program.

Job Australia Member Response:

“If I was to hazard a guess – the new program will put some people with disability into NESM. They will stream young people either in school or those who have left prematurely into an expanded Transitions to Work, and they will stream some of the older folks into Career Transition Assistance. We will be left with a much more complex caseload, with increased expectations, less resources and tighter funding models. We might even be swallowed into a jobactive folio. Who knows?”

8. A CASE FOR DEFERRAL

Jobs Australia Members recommend DSS defers replacement of the DES Program. Jobs Australia Members recommend time is set aside to design and properly test any alternative design to the DES program in exactly the same way as NESM was tested in a small number of trial sites – identified as the “New Employment Services Trial, or NEST.

Jobs Australia Members also recommend areas for improvement to the existing DES program in areas they feel currently inhibits their capacity to optimise performance.

Jobs Australia Members also respond to each of the questions in the nine (9) sections of the Public Discussion Paper.

Jobs Australia is clear in its recommendation to DSS:

- The current DES program should be continued for a further 12 months until at least 2023.
- The new program design must be informed by historical performance data and at least and equally importantly, DES Provider performance best practices.
- There are significant opportunities to improve the nature of the relationships between Funding Agreement Management, DES officers and Providers and Member-providers enthusiastically seeking to include Provider-Department relationships into the scope of the program review.
- Australia will have a Federal Election in 2022, with government moving to Caretaker mode until the election. There simply is not enough time.

9. JOBS AUSTRALIA AND JOINT PEAKS RECOMMENDATION

Jobs Australia refers to a copy of the joint-Peak Organisation DES Provider letter to Minister Ruston (letter dated 3 November 2021, see Attachment 1). The letter requests a delay to the change of DES programs by 12 months. An excerpt from that letter is provided below:

“Our joint-Peak Organisations request that the current DES program should be extended by 12 months with a revised implementation date of July 2024 to ensure sufficient time to design and trial recommended reform features of the new DES.

This is particularly in relation to the Reference Group’s capacity with regard to current timelines, to weigh up community consultation findings, complex data analysis and key research that determines reform recommendations. COVID-19 impacts have made the process more difficult as well.

The upcoming Federal Election, we feel, will severely impact and interrupt the critical work of the Reference Group and associated Working Groups.

Providing sufficient time to trial potential reforms and report back to Government and the Reference Group process will safeguard DES participants’ continuity of service as DES improvements are decided.

We again request Government extend the current program by (at least) 12 months and allow the co-design reform process to deliver on its objectives”.

10. PROVIDER RESPONSES – SAMPLE OF RECOMMENDED AREAS FOR IMPROVEMENT

During the development of this submission Jobs Australia completed a top-line review of the current DES program. Members contributed many areas for improvement, a sample of which is provided below.

Specific areas for improvement	Consideration
Stars Rating	Simplify. End regression modelling. Make transparent. Issue within four (4) weeks of evaluation. Allow four (4) weeks to review and query – but reduce queries by providing simple Key Performance Indicators.
Funding and other Agreement Management	Incorporate into one department, or totally review and re-align this important group. Create Service Level Agreement on meetings, review cycles, email responses, requests for advice and decisions, representation.
Aspects within current Grant agreement	Follow the terms and conditions in particular the qualitative components of Performance Assessments, Key Performance Indicators.
Related Party referrals for Training	Provide SLA on application process in order that advice is provided within 72 hours of application – or audit once a year and provide authority to refer to courses within specified scope.
Retrospective adjustment on performance ratings	For all issues excluding substantive breaches and criminal conduct – retrospective adjustment of performance ratings is to end – or is to remain within the current financial year.
Allowance for human errors	Change the current hard-line approach to treatment of human errors. If an error is committed and appropriately justified as ‘human error’ treat it accordingly.
Volunteer (participation without salary)	Placement of participant into volunteer activity and supporting their continued participation should be recognised in provider performance/Star ratings.
8 hours = 2 shifts	The current requirement for an eight (8) hour work obligation is unworkable because the standard working day shift is seven and a half (7.5) hours and many employers can find a single shift, but not shift-split or find two shifts. Hence the measure for provider performance and participant worked hours needs to be adjusted to reflect a single shift of seven and a half (7.5) hours.
NESM	Providers recommend in general terms, NESM is not appropriate for people with intellectual, learning, sensory or physical

	disability. Providers agree that on a case by case basis it may be relevant for a trial.
TAFE for referred training	TAFE is not at all appropriate for people with disability. Specialist run RTOS with disability specific focus get better results.
Early intervention	Providers believe they can be most effective when working in with schools and students with disability and want funding to be resumed for that activity/effort.

11. RESPONSE TO DSS PROVIDED KEY QUESTIONS

Questions from Section 1

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

Jobs Australia providers understand this question will be broadly distributed to providers and non-providers/key stakeholders for discussion and is certain that responses will be diverse.

A simplified response is people with disability should be able to access a disability employment support program. That is, people with an identified Sensory, Physical, Psychological or Intellectual disability. The age of these people extends from those still at school to those near retirement age.

The question becomes one of in-program identification.

Jobs Australia draws attention to the Job Seeker Capability Index (JSCI) and following ESAt Employment Services Assessment (ESAt) processes. When a person registers for inclusion into an Employment Services Program (ESP) they are required to complete a JSCI. If within the JSCI they identify with a disability and can provide documented professional opinion (and dependent on a number of variables) the person may be referred to an independent professional for ESAt.

Although recognised as being inconsistent in its application, the process for identifying which Employment Services Program a person with a medical profession-confirmed disability should be placed.

The following is an excerpt from the BCG review of the ESAts process.

(BCG ESAt Report > FINAL REPORT > 21 August, 2020)

“Employment Services Assessments (ESAts) are a critical process step in controlling entry into the Disability Employment Services program (DES), allowing for qualitative assessment of the employment barriers faced by job seekers. Ensuring that ESAts are effective, accurate, and consistent is critical to matching appropriate supports to job seekers, and for the ongoing sustainability of DES.

Using analytical and qualitative research, this ESAt Review identified that while ESAts are carried out with a high degree of professionalism, there are suggestions of variation in decision-making patterns, likely due to unclear and generalised guidelines.

ESAt assessors face the challenging task of making professional judgments of the severity of barriers to employment faced by a diverse set of ESAt participants. Tightening the guidelines, with clearer specification of what criteria should and should not be used to inform decision-making, will help ensure assessors are equipped to align decisions with policy intent. In addition, a revamped and more tightly targeted Quality Assurance (QA) process will communicate priorities and support information-sharing across assessors.

Broader, more fundamental reconsideration of DES design and eligibility is required. In addition, the complexity of organizational oversight for DES entry – where three policy agencies and one service delivery agency all have varying responsibilities and interests across the end-to-end process”.

There are a number of comments to make towards the BCG text –

ESAt must be consistent.

The reviews for the replacement program for Disability Employment Services include Policy – and it is disappointing that the discussion paper does not include discussion on Policy.

Programs are to be nationally inclusive and available, and currently they are not. ESAt reviews of Indigenous Australians in remote CDP regions rarely provide any direction on a persona disability and in any case – there are no disability specialist providers within or alongside current CDP providers.

Any suggestion that people with identified disability might be streamed into non disability-specialist programs (TtW, WfD, ParentsNext, CDP, jobactive) without those programs being significantly reviewed and adjusted would be rejected.

Jobs Australia Member Response:

“ESAt reports can be generic, tick and flick forms. The professionals that complete them do not use their qualifications or skills in any way. They read the reports given to them and make decisions based on this. People with long term disability often do not have up to date

or relevant information. How a person presents on the day, their history and any obvious (but unreported) barriers should be assessed. Conditions should also be listed separately. So rather than having a person referred with “Psychiatric Disability”, describe each condition. Often people have co-morbidity particularly with mental health and it is not helpful having no insight into the different conditions.

Work capacity should take into account work history – but also support required to maintain past employment. I have had a client who was given a 30-hour benchmark because they worked fulltime. Assessor did not take into consideration that the job was in a sheltered workshop and on supported wages.

Rather than singularly tightening the areas representing ambiguity – the processes should be co-informed with the Provider. Providers can contribute quality information about the jobseeker which without them is absent. This would increase accuracy and streamlining of the process”.

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?

In simplistic terms, Jobs Australia DES Members support policy and programs that enable people with disability to present and build on their strengths, experiences and opportunities for community engagement, employment and careers. Providers advise (and appreciate DSS is acutely aware) that government programs including DES provide safe, non-discriminatory, non-exploitive, welcoming and nurturing places for employment and community engagement. Participant supports are to be provided as they are in all aspects of the DES program.

We note these pre-requisites are universal and can be applied to similar opportunities for participants in jobactive, CDP, WfD, Transitions to Work and other programs.

In all cases there is increased focus and responsibility for all participant opportunities to be properly risk-assessed on a cyclical and ongoing basis in order people with disability are properly supported by the program. It would not be acceptable for this critical function to be omitted from standard operating practices.

All forms of participation, whether unpaid or salaried should be included into the performance scope to be reviewed by Stars.

Jobs Australia Member Response:

“Unless a complete overhaul of the current ESAt system is completed they simply cannot help providers stream individuals to the “right type” of employment support. ESAt assessments are advised by participants as running for as short as 10 minutes. This is dreadful. The ESAt process needs to be left to the providers who are the experts and who spend many hours with their clients helping to determine this or, add in career assessments, skills assessments, personality assessments. A 10 minutes chat is not going to cut it.”

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?

There are a number of key and primary issues to resolve:

1. Provider capability in the regions and remote areas. CDP Providers in general are not disability services providers.
2. The purpose of the program. If creating employment opportunities for employment of people with disability in urban centres is a challenge, in many of the 60 CDP regions it is impossible. So the question is, for what purpose? given mutual obligations to participate in activities no longer exists in CDP, would there be a consideration to provide DES services in CDP regions?
3. The issues of geographical distance, costs of servicing and even participant familiarity with the services would need to be considered.

Jobs Australia suggests that if the ESAt process is completed accurately and that the filters used by ESAt assessors are universally adopted and clear (across the Commonwealth), jobseekers will be placed into the Employment Services program best suited to their individual and tailored requirements. This does not suggest that people with identified disability should be streamed into any program that is generalist in nature, and where services are delivered by providers without disability employment services specialist skills and expertise.

DES providers do not support any discussion leading to the dissolution of the Disability Employment Services Program and inclusion of DES programs into either the jobactive or current CDP programs.

Programs for people with disability need to be discreet for effectiveness and there is ample evidence of high performance results in compact programs – for example, Transitions to Work.

Jobs Australia is not proposing that the migration of program administration within government should be separate from (say) DESE. However, the program itself must be kept separate to non-specialist programs (for people without disability) and we recommend there are precedents to support that. (TtW, WfD, Harvest Trail, ParentsNext.)

1.4 What is the role of the National Disability Insurance Scheme in supporting employment pathways, and how can this compliment a future disability employment support program?

The National Disability Insurance Scheme (NDIS) is provided to ensure appropriate level of support is provided to individuals and families who need support.

Any future role of the NDIS including possible complementarity between NDIS and a future DES will depend on Policy and the new program. Jobs Australia DES Members are keen to be involved in Policy discussion.

Questions from Section 2

2.1 How can the assessment process be improved to connect people with disability to the right employment services?

The DES Program is intended for individuals for whom disability is a contributor to their barriers to employment. We note that in remote areas the function of both programs is replaced by the Community Development Program (CDP) although the incidence of, and capacity of CDP Providers to deliver Disability Services is questioned by many current CDP Providers.

Services Australia is the key delivery partner (including ESAts management).

A two-stage process manages entry into these programs:

Job seekers complete the JSCI questionnaire, identifying where they might have substantive barriers to employment (including work capacity limitations, disability, or non-disability barriers such as homelessness). JSCI results will flag the possible need for an ESAt to Services Australia, who perform triaging before an ESAt takes place;

Triaging then decides who undertakes an ESAt, where an interview by an appropriately qualified individual (for example, allied health professionals) results in a recommendation for which program an individual should join and assesses their weekly work capacity.

Jobs Australia notes that if the ESAt process was properly and accurately completed in regions where CDP is delivered substantially more CDP participants would be streamed into the DES program. This is inarguable, as the frequency and incidence of Indigenous

Australians in the current CDP Program with sensory, physical or intellectual disability is similar to those of non-indigenous Australians.

The ESAt Review framework has been examined by Boston Consulting Group (BCG) and is found to be robust. BCG have advised that opportunities for varied interpretation of some of the critical aspects of ESAt can be increased in clarity and reduced in ambiguity for increased efficiency, consistency and accuracy of results.

The importance of accurate program recommendations and work capacity assessments underscores the importance of ensuring effective and accurate ESAt operations.

2.2 What should be considered during the assessment process when determining support required to help a person reach their work potential?

Jobs Australia Members refer to the ESAt process and advise the following:

An ESAt is generally conducted in a face-to-face interview undertaken by a Department of Human Services (Human Services) Assessor (DHSA)—who may be a nurse, physiotherapist, psychologist, occupational therapist or other qualified allied health professional.

There are two types of ESAts:

- A Medical Condition ESAt— an assessment of the Participant’s circumstances to determine work capacity and the most appropriate employment service, where one or more medical conditions are identified.
- A Non-Medical Condition ESAt— an assessment of the Participant’s circumstances to determine the most appropriate employment service, where no medical conditions are identified. A Non-Medical Condition ESAt is normally less complex than a Medical Condition ESAt.

An ESAt assesses the Participant’s work capacity in the following bandwidths: 0–7 hours per week, 8–14 hours per week, 15–22 hours per week, 23–29 hours per week and 30 or more hours per week.

The Assessor may suggest suitable types of employment and interventions that are most appropriate to meet the Participant’s needs. The report prepared by the Assessor is available on the Department’s IT Systems to be viewed by the Disability Employment Services (DES) Provider and should be used to develop the suite of services to meet the Participant’s needs.

2.3 How can the assessment process stream an individual with disability toward the right type of employment support, depending on need and goal?

Members advise that following the JSCI an ESAt assesses the Participant's work capacity in the following bandwidths: 0–7 hours per week, 8–14 hours per week, 15–22 hours per week, 23–29 hours per week and 30 or more hours per week.

The Assessor may suggest suitable types of employment and interventions that are most appropriate to meet the Participant's needs. The report prepared by the Assessor is available on the Department's IT Systems to be viewed by the Disability Employment Services (DES) Provider and should be used to develop the suite of services to meet the Participant's needs.

Jobs Australia recommends that Providers are part of the ESAt process and are able to provide insight into the independent professional engaged to produce the ESAt.

2.4 Are there different assessments needed at different stages of an individual's work journey, as they prepare for work, find and maintain employment and progress their career?

Jobs Australia Member Response:

Jobs Australia Members are surprised that these questions appear to be seeking information on well-established 'pillars' of Employment Services Programs.

Members advise:

- the JSCI (Job Seeker Capability Index)
- the ESAt
- Barriers to employment form (commonly used in-house by CDP Providers)

Jobs Australia Members do not support any discussion which might recommend the inclusion of new and or additional assessments.

Questions from Section 3

3.1 What has been your experience of receiving employment support from a DES or other employment service provider? What was good about the support? What improvements would you recommend?

This is a question for participants in the DES program. Jobs Australia and DES Providers are unable to respond.

3.2 What type of services and support would best help a person with disability find and keep a suitable job, and progress their career? Who would provide that support?

Jobs Australia Members advise Disability Employment Services Providers have been and will continue to provide services and support (pre and post-employment or community volunteering/short term work experience) as identified by the participant, the ESA and/or JSCI and reflected in the participant tailored pathways.

3.3 What education and training opportunities help people with disability overcome the entry barriers to employment?

A variety of education and training opportunities exist and are provided by registered Training Organisations. Participation in any education and training is referred to by the DES Provider.

Jobs Australia Members are disappointed that the DSS removed the opportunities for Related Party referrals of DES Program participants to be referred to specialty courses within the Providers corporate enterprise. Although there is an application service available, Members advise the period of elapsed time between application submission and response can be months in duration frequently by which the person with disability has lost hope and anticipation that there might be a course to help them in the region in which they live.

Jobs Australia Member Response:

“TAFE is useless for people with disability. The decision to remove related party referrals where the Provider had an RTO was a tragedy. For sure, a few people abused the system and that loop-hole has been closed. But the folks that really felt the disadvantage are the participants. It is as if the Department wants our specialist services – but not if those specialist services relate to Training. We could persist – but it all got too hard and really – we do not have the time to manage the inertia in government”.

3.4 How can people receiving disability employment services also be supported to address other barriers to employment (health service, housing assistance, for example).

Jobs Australia Member Response:

“Jobs Australia Members advise that at the centre of DES participant engagement with providers is the overall health and well-being of the participant. The DES providers are central to providing support to identified conditions, for which external references may be required. These may include other barriers to employment including health services, housing assistance and other matters. It may be the National Disability Insurance Scheme is able to support these issues or it may be other entities are engaged as part of the participant referral processes”.

Jobs Australia Member Response:

“My team spend more than 50% of their time assisting clients address non-disability related barriers. Local services are poor for things like housing, drug and alcohol, mental health, crisis accommodation, domestic violence, financial assistance, transport. The DES program fills many gaps in this regard and is not given enough credit for the work they do in helping people get ready to work. **You cannot get a job if you live under a bridge.** A lot of work goes into this and often not just referral to other agencies but actually doing the informal counselling, spending money on food and petrol, driving clients to the mental health unit”.

Jobs Australia Member Response:

“You have Closing the Gap for Indigenous Australian people – why is there none for people with Disability?”

3.5 What employment support do mature-age people with disability need to successfully gain or retain employment, or transition to new employment or a new career?

Our observations and experience is that this is entirely dependent on the broader context for the mature aged jobseeker, as well as the specific nature of their disability.

The following factors are critical:

- Is the person living in a metropolitan or regional/ remote area?
- Does their identity and gender preference create barriers to employment?
- Is the workplace safe for people with disability?
- Has a match been done to connect existing skills and those required for a transitioned career?
- Are there logistic, health, housing and or other challenges?
- What would the Post Placement support requirements be?

Further – how does the ESAt and JSCI inform the processes at the time, and then – are there any existing supports which might assist or need to be accessed to support the jobseeker?

This question may appear to create opportunity to discuss Career Transition Assistance. Members are concerned that programs for people without disability may be considered for people with disability.

Jobs Australia refers to Transition to Work (TtW), Career Transition Assistance (CTA) and New Employment Services Model (NESM) and questions the capacity for those programs to properly accommodate people with disability and recommends comprehensive review prior to any the development of opinion, policy or program.

Jobs Australia Member Response:

“Why? when you have Disability Employment Services providers – would you send people with disability to someone like a Transition to Work provider? TTW is for people who have left school”.

“We need to be finding work for young people with disability who are at school and will remain at school until end year 12. If we can get to them early – we can prevent them getting onto income support, and we have the best opportunity to keep them into the jobs they started with at school. Removing our ability to provide support UNLESS the participant is registered for the Dole is about as short-sighted as you can get”.

Jobs Australia Member Response:

“It is critical for young people with disability to be given opportunity to work whilst still in school. After school jobs are what setup great foundations for later in life. Work behaviours are learned here. The fact young people with disability who require support to get and maintain these types of positions are not given this opportunity through something like the DES program is borderline discrimination in my view. They need early intervention. There was a trial completed and no results of this were ever released. Working aged people (15 and above should be able to access DES support even if not in the last year of school).

DES has a major part to play in this area but because we are good at it (i.e. it costs too much money) the opportunities for us to do so are continually being taken away with stricter guidelines around entry requirements. The BCG report states that DES should work more with young people, yet this has been made harder by making non-allowed entry to the program. The fact we need to encourage a young person to get onto a Centrelink benefit to receive support to find employment is one of the worst policy decisions I’ve ever experienced during the life of disability employment programs”.

Questions from Section 4

4.1 What support do young people with disability need to successfully move out of education and move into work?

Jobs Australia Member Response:

“Our observations and experience, this is entirely dependent on the broader context for the young jobseeker, the output from their JSCI and ESAt as well as the specific nature of their disability. Consideration might be provided to the Transitions to Work program as it ‘may’ (with comprehensive review and adjustment) have some capability to accommodate some young people with disability”.

The following questions are critical:

- Is the person living in a metropolitan or regional/ remote area?
- Does their identity and gender preference create barriers to employment?
- Is the workplace safe for people with disability?
- Are there logistic and or other challenges?
- What would the Post Placement support requirements be?

It is important to consider factors as to how the JSCI and the ESAt process may inform how to respond to young jobseekers with disability.

Jobs Australia Member Response:

“YES – there should 100% access to employment support for young people with disability still in school”.

4.2 What best practices from existing DES or other employment programs help young people with disability find and maintain a job?

Jobs Australia Member Response:

“The Discussion Paper from DSS references Transitions to Work (TtW) and Community Development Programs (CDP) as possible supporters of jobseekers with disabilities.

Jobs Australia advice is that little if any disability support is provided by CDP – there is almost no expertise or capability to deliver services to jobseekers presenting with disabilities and more importantly, nor are there requisite support/referral services in any or most remote CDP regions.

Transitions to Work is currently not a provider of disability services to jobseekers with disabilities – and so whilst there may be slightly greater opportunity for TtW to provide disability employment services, Jobs Australia would query the wisdom of any move to segue young people with disabilities into providers where there is no specialist expertise. One would have to ask. Why? and for whose benefit?”

4.3 Should there be assistance to prepare young people to think about work much earlier than after they leave school?

Jobs Australia and Members have significant depth of experience in the delivery of Employment Services Programs. The question asked by DSS is an important one, but one we feel is best addressed by skilled educators with understanding of young people with disability across all regions of Australia. We feel any answer should be in the interest of the person concerned and not one of curriculum, or other mandate.

Jobs Australia Member Response:

“We used to be able to provide services to young people with disability and help them get employment before they were registered for government income. The change to this was a terrible decision. Why? The first income that young person received was for being unemployed. We used to be able to get them into work – BEFORE they experienced income from the government. Their first income was a wage- how validating – but that was changed. It needs to be brought back!!”

4.4 How can disability employment services work better with the education system to enhance employment prospects for young people?

DES providers have opportunities and in fact, most already do, to promote their services at schools, in local chambers of commerce, shires, at campuses for higher education, and with the local skills and jobs hubs and with individual employers. Working with schools and the education system is part of the overall support and contribution made by DES providers into the communities in which they are licensed to deliver services. What is equally important is that they are funded to undertake this most important work.

We recommend the department refers to pre-existing data to assist inform this aspect such as with special schools and discuss issues with specialist providers.

Jobs Australia Member Response:

“Policy needs to enable this. We recommend that DSS can better assist DES providers to continue the relationships they have cultivated over decades with the local school community. Stop introducing policy which makes it impossible for us to register school students and school leavers”.

DES Providers must be able to intervene as early as possible (perhaps Year 9) with the people presenting with disability and whilst they are still at school create/provide access to after school jobs – including:

- Work experience programs.
- More funding support to provide more structured programs, for example, having a student attend school every day but only attend their Provider once a fortnight is not adequate.
- Work behaviour training.
- Better integration with NDIS – SLES program.

Questions from Section 5

5.1 What are the most important things that can be done to build an employer's confidence to employ a person with a disability?

Our observations and experience is that this is entirely dependent on the broader context for the young jobseeker, as well as the specific nature of their disability. However, in general terms the strength, features and benefits of the relationship are critical factors:

- Positive relationships need to be formed between DES provider, participant and employer.
- Trust is critical and cannot be built without Providers.
- Risk assessment, physical/infrastructure barriers are removed completely.
- Small achievable steps build work-place capability and confidence -including short term work experience.
- Frequent Post Placement support.
- Wages subsidies where applicable.
- Appropriate relevant infrastructure.

The following questions are also critical and have been presented previously in this document:

- Is the person living in a metropolitan or regional/remote area?
- Does their identity and gender preference create barriers to employment?
- Is the workplace safe for people with a disability?

- Are there logistical and/or other challenges?
- What would the Post Placement support requirements be?
- What does the ESAt process inform?
- What does the JSCI advise?
- What support services are available for referral (housing, accommodation, other)

5.2 What services and supports does a disability employment support service need to offer employers to enable them to recruit people with a disability, maintain their employment and promote career growth?

Jobs Australia Members again refer to the DES Providers Jobseeker needs analysis following access to the JSCI and ESAt, and interviews with both the jobseeker and the employer.

Supports and services are provided to mitigate gap between employer and employee, and if properly designed and expressed in the new workplace – are individually tailored.

Employers of people with disability have advised Jobs Australia that the following is critical:

- 1) the benefits of employing people with disability are well explained
- 2) the supports required are provided as needed by the DES Provider
- 3) if needed they are provided with access to other employers to understand their experiences.

A range of services and supports might include:

- Functional support – transport to and from work
- Infrastructure support – changes to the physical workplace (access/bathrooms etc)
- Making the workplace physically safe for the new employee
- Educating workplace on working with people with disability
- Psychological support to new employee with disability
- Coaching, mentoring, additional training
- Workplace partnering – long term assistance and support in, and outside the workplace
- Possible relocation to secure employment
- Referred Services including (training housing transport medical psychological)
- Be flexible with work hours

- Be flexible in supervision and oversight
- Engage in conversation with participants
- Where employers are willing to be engaged and carve out a suitable role for participants.

5.3 What are examples of good practice of employer engagement and employer-led initiatives that have been shown to improve employment outcomes for people with disability?

How could these be scaled in the disability employment services program?
Employer successes are typically achieved when:

- There is a flexibility with roster scheduling and or working hours
- There is an absence of “workplace othering” and a supporting flexibility in supervision and oversight
- There is open supportive engagement in conversation with participants
- Where employers are willing to be engaged and create a suitable role for participants.

5.4 What other information, services and supports to employers need to support employees with disability?

Members advise the following:

- Employers look for client flexibility to meet work requirements
- Service Providers be allowed flexibility to support clients at work

Questions from Section 6

6.1 What specific assistance or flexibilities would better support people with disability to meet their mutual obligation requirements?

Jobs Australia Member Response:

“Mutual Obligations are to be risk-assessed and mitigated, safe, legal, non-exploiting and developing for the participant towards activity or employment readiness.

The JSCI, ESA and Barriers identification processes will assist and inform not only the activities but the support activities required.

Mutual obligations are to be individually tailored to suit the participant with disability”.

6.2 How should a future program consider other forms of participation and engagement such as voluntary work or community engagement?

Jobs Australia Member Response:

“Volunteer and community engagement should be allowed within the scheme. Flexibility should be allowed to support service providers in assisting their participants. While compliance requirements are appropriate, a “valid or not valid” approach does not support service providers to work with the unique challenges presented by clients.

Providers advise that providing the activities (voluntary work and/or community engagement) are legal, safe, non-threatening, non-exploitive and are identified by the host and the potential participant as being useful and relevant for both parties, and all other pre-requisites are achieved then, and in general terms, these activities are to be welcomed, supported and encouraged. Providers advise that tailored pathways remain important and that there is some scope and timing placed on any non-paying activity so that opportunities for progress to employment may be realised”.

Questions from Section 7

7.1 How could future funding arrangements ensure services across a continuum of work readiness, placement and retention are tailored to the needs of the participant?

Jobs Australia Member Response:

Providers recommend that a longer term view of the employment challenges for people with disability. Current emphasis on meeting targeted performance results have in some areas, created unsustainable stresses between jobseekers and employers.

Providers agree that performance outcomes are required. Providers recommend that there is the capability to accumulate the 26 week outcome, but over and up to 52 weeks or even longer if the person is not obligated to work full-time. In some cases, continued employment is entirely dependent on the continuation of support.

The nature of employment has changed in recent years. Under the DES program, are people who elect to (for example) drive for Uber (or others) or deliver food using their own vehicles and in doing so, become self-employed contractors? How is this to be recognised and rewarded within the DES Program? Providers recommend that a Policy is required to enable “gig-economy” and self-employment to be included into the Program.

7.2 What are the right pricing and funding arrangements, balancing provider viability with the cost of delivering high quality services to participants and employers?

The answer to this question is uncomplicated.

Whatever it takes to get people with disability at all levels and categories into contributing employment and to keep those people into the employment of their choice and skills.

It is important that the Department creates fiscal modelling which compares the cost of a person with disability being placed into and kept into employment against the cost of maintaining the same person on what is likely to be a life-time of government provided income.

7.3 How could the future funding model be adapted to recognise changes in the labour market and types of employment available in the modern Australian economy.

We recommend DSS develops Policy and Processes which inform and enable regular cycle reviews – which might be visioned as “DSS Employment Forums” and involve perhaps a comprehensive review each 24 months.

7.4 How can service quality and expertise be rewarded and balanced against quantity of outcomes?

Members advise that service quality and expertise are appropriate and should not be changed.

7.5 How could funding arrangements for ongoing support be improved to ensure supports and services and tailored to the needs of the participant and the employer?

Flexibility of funding within disability types would be appropriate together with information sourced from client records.

Information from employers and providers would also better inform this process.

7.6 What do good providers currently do to support people with disability into work?

The issue of best practice is an important one. Jobs Australia Members recommend a national forum should be held every 12 months to examine best practice and reference the

findings against KPI's and published for provider use.

Jobs Australia Member Response:

“Successful providers like us choose to intervene early. We tirelessly promote our services and participants, and we are embedded into the ‘fabric’ of the communities in which we operate. Our job is to know what we call “the triangle” - we know the employer, the jobs they have and the participants. We build strong local and effective relationships, understand their participant, understand the employer, work tirelessly within the program to deliver the services and ensure that through our effort and the services we provide – we make a measurable difference and contribution to the community.”

Questions from Section 8

8.1 How should an effective and efficient competitive provider market be structured and how should business be allocated?

The notion that the Department would seek to create competition within its Disability Provider Services channel is problematic and in some discussions, counter intuitive.

Jobs Australia Members do not support DSS sponsored competition between providers.

Jobs Australia wonders what the purpose of competing providers against providers?

Jobs Australia also asks what evidence is used to satisfy DSS that intra-channel competition creates increases in quality of service and quantity of results performance?

Jobs Australia Member Response:

“This is just ridiculous – not only do we have the Star ratings system to contend with, we are expected to compete against each other. Maybe sometime DSS will realise that putting a competitive obligation into the mix distracts us from delivering the best to people with disability. We are just flat-out getting people into jobs. That is hard enough.”

8.2 How can the future program settings encourage and reward innovation and continuous improvement? What works well in the current program?

The design of Policy for future Disability Employment Services programs should not be distracted beyond placing people with disability into employment and keeping them in employment.

We recommend the policy settings are kept simple, and that the program design has sufficient operating width to create sustainable employment for people with disability.

Jobs Australia Members recommend flexibility in arrangements and reward for work performed are key aspects to consider.

8.3 What arrangements should be in place for market regulation and quality assurance of services?

Jobs Australia Member Response:

We understand one of the important roles of government is to regulate.

Jobs Australia members recommend greater emphasis and effort is successfully applied to achieve simplicity. The regulatory arrangements will also be informed by the legal mechanism for engaging service providers under the new disability employment support model.

There are provider service compliance audits for National Standards of Disability Service by independent third parties which includes engaging with clients and employers and these should be better used in service provider reviews to have objective criteria instead of the current complexity of the star rating system which clients and employers do not use.

8.4 What legal model would be most appropriate to manage the terms and conditions of the agreement between government and disability employment services providers?

The current form of Grant Agreement is considered appropriate, but there are a number of options that could be used for legally engaging providers in program services provision with the DES mid-term review noting three possible models - including:

- Grant Agreements
- Contracting

- Licensing

Jobs Australia is aware of discussions which may lead to early exit of under-performing providers. Jobs Australia Members do not consider any narrowing of tolerances on contracts to be useful for the stability and overall performance of the DES Provider channel.

8.5 What is needed to lift workforce capability and the quality of the workforce delivering disability employment services and supports for both participants and employers?

Jobs Australia Member Response:

“Members advise the National Standards for Disability Services set the parameters for the provision of Quality Assurance Standards. DSS is responsible for monitoring and managing performance of its providers and it in part does so using the Star Ratings”.

“Educate, educate, educate, review and reform”.

8.6 Is there a market need for specialist providers (disability/industry/age/cohorts) that would increase employment opportunities?

Experience shows that there is a specific need for specialist providers such as for IALD. We encourage the Department to specifically engage with current specialist providers/ Jobs Australia Members for relevant comments.

Questions from Section 9

9.1 What will success look like for?

- People with disability
- The community
- Employers
- Service providers
- Government

The purpose of Disability Employment Services is to provide support to enable people with disability achieve and sustain employment in workplaces that are free of discrimination, emotional and physical prejudices and where the participant is able to contribute in balance with their ability and future ambitions.

9.2 What data do we need to know if the program has been effective?

Jobs Australia Member Response:

We recommend data which forms evidence of quantitative, qualitative and numerical target and retention Key performance indicators.

We refer DSS to Section 5Q Assessment and management of Program Service providers performance, in document titled Disability Employment Services Grant Agreement, 1 July 2019.

Above and beyond the data – the key performance indicator is surely the numbers of people with disability in employment and contributing to the national economy, in doing so positively contributing to their wellbeing, for employers and society.

9.3 How can people with disability, employers and providers help to measure and report on the performance of the new program?

Ultimately this depends on the final features of the program. In essence more people with disability of all types gain employment which positively contributes to their wellbeing, for employers and society.

As key consideration, Jobs Australia recommends each of the target groups identified in this question contribute jointly and singularly to surveys and focus groups on the basis of qualitative and quantitative audit.

Jobs Australia recommends investigating local jobs and skills taskforce program provided by DESE <https://www.dese.gov.au/local-jobs-program/taskforces> with a view to identifying similar opportunity for disability employment services to pilot in a number of local-areas.

The pilot panel would include schools, RTO, employer groups, people with disability and Providers.

9.4 What do people with disability and employers need to make an informed choice to select the best provider for their needs, and how could this information be made available?

We refer to the DESE Website:

<https://jobsearch.gov.au/serviceproviders?ProviderType=DESB&ExactWord=false>

This website enables search by Employment Services providers, post code or area, or can be searched nationally.

It needs to be simple to understand and transparent.

12. CONCLUSION

DSS has an opportunity to completely re-format the current DES Program after careful consideration of the Policy settings and historical performance data from the current program.

Opportunities of this nature are perhaps a once-in-a decade event and Jobs Australia and its Members recommend deferring replacement of the current program for at least 12 months.

Economic rationalist approaches are important. Reviewing costs is an essential component of governance. However, cost examination in the search of efficiencies must not be a single driver for performance.

There are many inefficiencies and challenges within the current program and these must be addressed before there is a segue to a new DES program.

Jobs Australia and Members recommend that the program remains discreet, and consideration that it might be somehow blended with Transitions to Work for young people with disability and Career Transition Assistance is not supported. We do not support the application of the NESM to people with disability.

Jobs Australia and DES Members appreciate the opportunity to commence 2022 with some 'deep dive' discussion with Department of Social Services on Policy for future DES programs and to work collaboratively in identifying the right solution.

13. ACKNOWLEDGEMENT

This document is prepared from Jobs Australia Members opinion and advice.

The interviews, discussions and investigations used in this response were produced on land belonging to the Yawuru people. Jobs Australia pays its respect to Elders past, present and emerging and gives thanks to the daily effort by Indigenous Australian and Torres Strait Islander peoples to achieve reconciliation.

Jobs Australia thanks the Department of Social Services (DSS) for the opportunity to contribute to discussion on the development of a New Employment Support Model for participants identifying with one or multiple disabilities. The program currently used to

support people with disability into employment is referred to as “DES” or Disability Employment Support (DES).

Jobs Australia thanks all Disability Services Providers and Members for their tireless effort and commitment to assist people with disability into work-readying programs and employment.