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**We see
potential.**

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Disability Employment Reforms Branch
GPO Box 9820
Department of Social Services
CANBERRA ACT 2601

Dear Sir/Madam,

The Maxima Training Group (Aust) Ltd "Maxima" welcomes this opportunity to provide a submission in response to the Consultation Paper on a New Disability Employment Support Model for the next Disability Employment Services (DES) contract.

Maxima has successfully delivered disability employment services since 2015. Currently, as part of the Disability Employment Services (DES) 2018 – 2023 Grant, we deliver both the Disability Management Services (DMS) and the Employment Support Services (ESS) from over 60 locations around Australia.

In addition to our DES services we have, since 2020, been delivering employment services within the National Disability Insurance Scheme. These include *School Leaver Employment Supports* and *Finding and Keeping a Job*.

Since the organisation's inception in 1985, we have also been delivering a range of employment services around Australia. These include Group Training, Indigenous Employment Services and Temporary and Permanent Labour Hire.

We look forward to the ongoing consultation with the sector on the development of the New Disability Employment Support Program.

We are happy to be contacted further if required. We are also happy for our submission to be published.

Kind Regards

A handwritten signature in black ink that reads "D. Cockram".

David Cockram
Chief Executive
The Maxima Training Group (Aust) Ltd

General Overview

Maxima agrees that there is need for reform to the DES program. The impact of Covid and other changes to the operating environment such as digitalization, remote servicing and working from home are all pressures that demand attention.

We believe the reforms currently mooted have not been thoroughly tested, do not necessarily translate readily to people with disability and in some ways will have an adverse impact on the successful participation and employment of people with disability.

The Discussion Paper provides some guidance as to the direction these reforms may take. However, we caution that it is not as simple as making the New Disability Employment Support Program mirror the changes that have resulted in the New Employment Services Model (NESM) replacing jobactive. Quite simply, there is not a large cohort in the DES caseload that could be annexed off to receive Digital First services.

We also urge caution regarding conclusions drawn based on the performance levels of the current DES program. There have been multiple external disruptions to the operating environment. These include large bushfires across the nation, the COVID-19 Delta wave and now the COVID-19 Omicron wave. The latter two have played havoc on all stakeholders within DES including customers, employers and providers.

Across Australia labour markets have been affected differently both in terms of intensity and timing due to these external disruptions. DES providers have shown great resilience in continuing to deliver service despite these setbacks. The motivation of customers has been severely tested as employment opportunities disappear. Employers can provide no certainty as they struggle to keep their own businesses operating. With the current Omicron wave DES providers are now also dealing with absences of their own staff on a much larger scale.

We strongly believe there has not been sufficient consideration of the impact of these disruptive events in developing a coherent assessment of the current DES and subsequently to inform any discussion of a New Disability Employment Support Program.

Finally, there are several papers discussing reform in terms of people with disability and employment. These include:

- Consultation Paper on a New Disability Employment Support Model;
- National Disability Employment Strategy; and
- NDIS Participant Employment Strategy

On reading these papers, there is some degree of tension in the public policy framework around people with disability and employment. These tensions include the goal of increasing participation, restricting eligibility to programs and the level of government spending.

Our response to specific questions is as follows:

Who should be able to access a specialist disability employment program?

The Discussion Paper states that:

“Currently, people eligible for DES include those with a disability, injury or health condition that will last more than 6 months. As at 30 September 2021, there were more than 310,000 people participating in the DES program.”

Changes to eligibility for DES introduced on 1 July 2021 if carried over into the NEW Disability Employment Support Program will undoubtedly reduce the scope and number of people with disability accessing these services.

We believe any further changes to eligibility will only exacerbate the restrictive nature of criteria for people with disability to access services and run counter to the principles expressed in the National Disability Employment Strategy of simplifying and improving access to services.

Remote servicing due to the impacts of COVID-19 has, by necessity, resulted in services offered online including digital job search, learning activities and access to phone or other online support. However, we remain sceptical that a convincing and definitive case has been made that such an approach is sustainable for large numbers of this cohort.

Our strong view is that access should be as simple and inclusive as possible to encourage and facilitate the participation of all people with disability in a critically important aspect of anyone’s life and a basic human right, i.e., the right to work and contribute to the community and economy.

How can we simplify entry into the disability employment support model?

Maxima agrees that there are issues with the current assessment model that stem from a deficit model approach. Issues around current assessments include availability, timeliness, accuracy and consistency. We would support a move to a well-considered and validated strengths-based assessment framework.

The current method of expressing work capacity in terms of benchmark hours also has its limitations and issues. However, any alternative approach would need to be rigorously tested and developed with wide consultation with all stakeholders.

If a goal of the new Disability Employment Support Model is to increase the participation of people with disability in the labour market (as per the National Employment Strategy for People with Disabilities) then eligibility should be simplified significantly.

What employment services and supports would most help people with a disability?

The New Disability Employment Support Model should provide:

- Quality information on the world of work adapted to local labour market conditions including:
 - Specific Occupational information
 - Skills Development
 - Career Pathways
 - Employer Expectations

- Job Search training
- On the job support, including employer and worker support and training
- Strengths-based intensive case management
- Skills-based Career Development

For young people in particular the following areas are of importance:

- School to work transition support
- Information on pathways available:
 - Employment
 - Further Vocational Education and Training including Group Training and Apprenticeships and Traineeships
 - Government Programs and Support
- Intensive Job Search training around developing soft skills:
 - Interviewing, Resume writing
 - Meeting Employers Expectation
 - Communication and Teamwork
- Work Experience

What support do Employers need to attract, employ and retain people with disability?

We believe Employers as a stakeholder group that facilitates demand still require:

- Convincing on the business case of employing people with disability
- Practical guidance on the “How to” aspects of employing people with disability
- Clear information on incentives available
- Incentives that match those for people without a disability
- On the job training for the Employer and co-workers.

How do we best tailor mutual obligations requirements to increase the likelihood of people with a disability find work in the future?

In relation to mutual obligation this is one area that changes to NESM could be readily applied to any New Disability Support Program. This includes the widening of ways in which mutual obligations are achieved as well as facilitating self-reporting using online tools.

How can funding arrangements incentivise good work arrangements?

Maxima supports a funding arrangement that drives providers to focus on long term sustainable outcomes within a career development framework.

We would recommend simplifying the current 5 levels of funding across the various Outcome milestones.

To enhance a focus on career pathways we recommend that the current four weeks’ payment be modified to include a part payment for placement plus a Career Placement Bonus for any placements that can be identified as meeting criteria for a Career Placement.

To further invest upfront in participants, providers almost certainly need higher Commencement fees. Ongoing service fees could be reduced to achieve this. Service fees could also be tied to evidence of progression by individual jobseekers.

We strongly support the retention of Ongoing Support Fees. These are important in helping to achieve long term sustainable outcomes. In addition to achieve a focus on career development we recommend a Career Advancement Bonus to be paid annually based on agreed evidence that a participant has made demonstrable advancement in the career that they may be pursuing.

We recommend that the Work Assist Service and Outcome fees are retained.

How do we drive high quality services and supports?

We strongly recommend the retention of the current Quality Assurance Program within DES. In addition, the audit cycle against the National Standards for Disability Services should continue to be used.

How do we measure success?

Maxima believes individual provider success could be measured across a range of agreed industry benchmarks such as:

- Quantity and Quality of Outcomes with an emphasis on sustainability
- Compliance
- Customer Satisfaction

If necessary, the benchmarks could be tailored to labour markets by incorporating a “disadvantaged labour market” weighting factor.

In addition, the industry benchmarks should be adjusted at regular intervals to either reflect maturity of the services or for external disruptions and shocks.

These could be measured on a quarterly basis with providers that do show improvement over two quarters being requested to develop corrective action plans.

The current Star Ratings framework remains complex, a mystery to many and, due to its provision of information to providers in an untimely fashion, often makes it impossible to institute any corrective action without a significant lag.