Shaping your new disability employment support program

Stakeholder Engagement Submission by:

Royal Society for the Blind of SA Inc

Introduction

The Royal Society for the Blind of SA Inc (RSB) welcomes the opportunity to contribute to the review and development of Australia's Disability Employment Services.

We would like to provide our responses to the questions raised in the Consultation Paper, and this document may be published.

We would also recommend that the Department makes use of the ability to extend the current DES 2018-2023 Grant Agreements for two reasons. Firstly, to allow a period of testing to occur utilising whatever changes are introduced to the servicing of people with disability in the new service delivery model.

For example, the New Employment Services Trial ran concurrently with Jobactive, and allowed the Department of Education, Skills and Employment to test their new servicing model. This enabled them to assess its suitability through practical application in the market, and make necessary adjustments based on the experiences gained, before finalising the model and releasing the exposure draft.

A period of testing such as that used by DESE above should significantly reduce the likelihood that any changes to the current DES program would have unexpected and undesired impacts to people with disability, service providers or the Australian Government.

Secondly, with 2022 being an election year, it would be expected that major changes to programs and policy would likely be stalled after the election is announced and the Government enters caretaker mode. An extension of the current DES 2018-2023 Grant Agreements would remove the significant time pressure required to plan and deliver a tender document for an effective and potentially new program for people with disability.

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Responses to questions in the consultation paper

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

Services should be available to:

- Anyone with a reduced work capacity due to disability, including sensory, mental or physical health/impairment conditions
- Anyone who qualifies for DSP or NDIS or has been assessed having reduced work capacity (with intervention)
- People with disability that are genuinely seeking assistance to gain, maintain, or change employment and volunteer to do so
- People with disability that are required to seek employment due to mutual obligations
- Anyone with a disability from cultural and linguistically diverse backgrounds with assistance, resources and information that is accessible in other languages
- People with disability should have access to specialist service providers to ensure they receive effective servicing. For example, Auslan Certified Provisional Interpreters for Deaf, Sighted Guide/Orientation & Mobility Instructors for Blind, etc
- Anybody that has a disability and is assessed as benefitting from being on program or feels that they are unable to manage their employment-related needs on their own and requests to be on a non-self-serve program.

Re-entry to the program should be flexible and not require forced progress through interim program stages. For example, participants in Ongoing Support that lose employment and exit the program should be allowed to restart Ongoing Support should they recommence employment with the employer.

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?

Casual and part-time employment, voluntary work and short-term unpaid work experience are all relevant pathways for a disability employment support program. Providers and/or participants should be incentivised and/or recognised for progression activities such as training, voluntary work placements and work experiences.

Any such progression activities would need fair, ethical and equitable conditions, and be co-designed with the participant to recognise individual choice and control.

Community engagement would normally be considered an NDIS support, and therefore should not be considered an employment pathway for a disability employment support program.

Ensuring staff have the skills needed to effectively assist participants with disabilities to gain and maintain employment can be challenging. Including additional expectations and responsibilities, such as providing supports for community engagement, would make it harder for providers to staff employment consultant roles.

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?

Referral pathways from NESM & CDP to disability employment need to be simple.

People with disability should be able to transfer to NESM or CDP if they make an informed choice to do so, and the receiving NESM/CDP agrees they are able to support them.

There are currently people with disability that are not able to receive disability employment supports due to the eligibility changes for DES in July 2021. These prevent registration of people with 30+ hour benchmarks or those not on allowance (or meeting the exception rules). NESM does not have specialist providers that service clients with disability.

A disability employment program needs to be able to accept clients that are not able to benefit from NESM or CDP, regardless of their benchmark hours or allowance status, due to:

- Inability to access online or digital servicing due to their disability – for example, clients with Intellectual and learning difficulties, or blindness/vision impairment.
- Inability to benefit from normal enhanced services due to their level of disability or other requirements that a generalist provider would not have access to, for example, Auslan interpreters, JAWS screen reader software.

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

To avoid confusion and potential 'double-dipping' of resources – or worse, 'buck-passing' where supports are expected to be provided by the other program, DES and NDIS should have clear boundaries. If a person is eligible for a DES service, then the person should receive it from DES. If not, then NDIS may assist.

NDIS supports can provide assistance with

- Transport, upskilling/certifications/licensing/clearances, workplace mods, PPE
- Supported employment funding

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

Assessment processes should be easy to access and provide prompt results. Where an existing assessment does not require update as there have been no significant changes to circumstances, then a new assessment should not be required.

Following the assessment, DHS/Centrelink should always offer any specialist providers servicing the ESA as the primary option to clients on registration or transfer, with any local generalist providers provided as alternate secondary options. The current assessment process often breaks down in the referral stage with either the assessors not knowing the specialist providers, or making decisions based purely on location of a provider.

Improved matching tools should be used to ensure that participants are allocated to an assessor with the appropriate training and skills for the types of disabilities being assessed, or that the assessments are reviewed by someone that does. This would address issues with inappropriate assessment outcomes including incorrect funding levels and/or benchmark hours.

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

When asked at the provider initial appointment stage, a large percentage of our clients respond that they were not involved in determining what support was required. The common theme of what they recall is being asked how many hours they feel they could work if supported, but then no further discussion around what that support might need to be or could be.

Assessments should consider:

- The impact that the person's disabilities have on their ability to search for, gain or maintain employment
- Past experience. If none, the discussion around what would be a suitable position for the skill held and meeting with both employer and employee to match the correct needs to be successful.
- Previous work history (or lack thereof)
- Ensure to ask and involve the client in what areas of support they feel they require.
- Whether an appropriate specialist is available to support them if DES is indicated.

- Assessment of the person's disabilities and other characteristics can then determine their benchmark (or outcome expectations) and the appropriate funding level

What tools or information is available to assessors to determine the right questions to ask and enable an effective assessment? Current ESAt assessments would suggest not all assessors have access to or use these resources (if available) based on the disparity of benchmarks and funding levels allocated to some participants.

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

As above – identify the impact of any disabilities on job search/employment first, then ensure the participant is advised of any available specialists instead of offering the closest providers.

Ensure assessors are familiar with the range of supports and services available from each of the specialists servicing their labour market area. This could be by inviting specialists to attend meetings with assessors (or vice versa) and obtaining promotional material from specialists.

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?

The current initial assessment on registration and Ongoing Support Assessment processes are sufficient for the majority of situations. The current ability to request a change of circumstances reassessment when required should remain.

The current 78-week review assessment serves no worthwhile purpose and is a waste of both DES Provider and DHS Assessment Services resources.

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

(N/A - RSB is an employment service provider)

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 should provide this support?

Specialists that have experience and expertise with their chosen cohorts will be best placed to support their participants.

- Correct job matching
- Career planning
- Guidance for voluntary work and work experience
- Assistance with job search skills training
- Reverse marketing
- Ongoing Support
- Individual assistive/adaptive technology
- Easy English supportive communication resources/platforms
- Access to funded training that leads to recognised qualifications, especially for those who had been working successfully in a role and due to either acquiring disability through injury, illness or genetics who can now no longer do what they are skilled in. They need assistance in the same way packages are put together for redundancies such as GMH to reskill workers.

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

- Car drivers license or ability to use public transport if they cannot drive.
- Industry-specific short courses and certificates
- Understanding and training in the use of adaptive technology, workplace modifications and on-the-job supports. For example, orientation and mobility training and scanning training for blind and vision impaired.

3.4. How can people receiving disability employment services also be supported to address other barriers to employment (e.g. health service or housing assistance)?

Non-vocational barriers that are not specifically employment-related should ideally be addressed by the NDIS. Where the participant is ineligible for NDIS, or the barriers are employment-related, then this should be addressed by the DES.

Support could be through assisting with referral to an appropriate support, or directly assisting with the issue if the provider has the appropriate expertise in-house

Raising awareness campaigns, engagement, empowerment, walking along side individuals re: tailored supports would also assist.

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

Career adjustment may be required for mature aged people that have been performing roles that have changed or evolved beyond their ability to demonstrate effectiveness in them. Government may wish to consider encouraging training

providers to offer more up/re-skilling courses for these people, in the same way they regularly offer upskilling versions of courses like the workplace training qualification.

Mature age people with disability may also benefit from:

- Assistance with digital technology and support around fear of new challenges in workplaces.
- Training and development opportunities

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

Young people need the following:

- knowledge about:
  - career pathways
  - training available
  - traineeship and apprenticeship system
  - supports available (including NDIS and employment providers)
- work experience and/or voluntary work with appropriate supervision, skill development and training opportunities to maximise their usefulness.
- support around starting new employment positions as it can be very overwhelming starting your first job.
- access to training and access to support while in training
- coaching & mentoring programs

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

Supports as recommended in item 4.1, combined with:

- directly marketing young people to suitable job-matched employers
- providing ongoing support.
- building resume writing and interview skills
- encouraging peer support

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

Schools should utilise available specialist disability/youth employment service and/or TTW & NDIS providers to assist students with their transition to work

Suggest developing a key life stages approach including:
- work experience during school years – pathways to employment
- internships

- transition to work programs and supports – partnerships between individual with a disability, their families, educators, and employers

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

Schools would need to value employment outcomes for their students equally with tertiary education before we could expect better linkages between school and service providers.

Providers can effectively deliver a range of services to young people as part of curriculum, including:

- Providing training for application letters/resumes, career advice, interview skills, how to approach employers both email, phone and face to face.
- Correcting attitudes for a positive outcome, and experience gained from various interviews can be very positive and helpful.
- Information on employment pathways and services available.
- Work experience opportunities in the earlier years of education
- Enabling school social enterprise programs
- Buddying programs in employment settings

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

- Marketing of the programs available to schools, employers, health professionals, etc.
- Provide short unpaid work experience opportunities. Make sure it is the correct job match and be honest around the person's disability and experience with the employer.
- Increased disability awareness and easy access to supports available including a variety of incentives
- Ensure the system is reliable and easy to understand.
- Provide education, information and training on the benefits and outcomes – how an individual with a disability would add value to an organisation

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

In the current Covid market we have seen considerable change in the way we offer more flexible recruitment to attract a more diverse range of applicates, maintain staff and promote careers. Learnings include:
- finesse job descriptions
- make information accessible
- consider alternative interview adjustments (eg, video, Zoom/Teams)

- understanding what an inclusion environment requires
- encourage flexible working environments
- adjust the workplace as required
- keeping an open mind on how we view skills and capacity
- consider the organisation culture
- More and better structured employer incentives promoting long term employment and career development.
- Add promotional messages and welcoming language – foster a culture of inclusion
- Further network with local, regional and national organisation opportunities
- Provide scholarships
- Develop peer and family connection programs
- Promote disability inclusion as an organisational value

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 program?

- Directly marketing applicants to employers
- Promoting flexible working environments
- Promoting opportunities to work differently, but to still achieve outcomes required

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

- Good understanding of the individual's needs and disability.
- More and easily available information about services and supports available, including wage subsidies, workplace modifications, SWS, disability support programs in general.
- Help with creating entry positions with training options.
- Embed accessibility into every part of their recruitment process
- Educating managers and employees in and around outcomes that are achieved by employing an individual with a disability
- Consider modifying working arrangements
- Ensure workers with disabilities can apply equally

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

Firstly, mutual obligation (MO) is a policy and responsibility of Government, and the decision making regarding the application of any penalties should remain within the Government. They should not be devolved to contracted service providers that may interpret MO guidelines in a way that best meets their

business objectives. Effective and fair application of mutual obligation principles requires the impartiality provided by a public agency like Centrelink.

Easier and clearer communication pathways between Centrelink and service providers will provide more effective application of MO principles. At present, many compliance failures are being overturned by Centrelink without any information to the provider regarding the reason for that decision.

To be considered:
- individual circumstances—in particular, their assessed work capacity (where relevant), their capacity to comply with the requirements and their personal needs
- the person's education, experience, skills and adjustments needed to support their work
- the impact of their disability on their ability to demonstrate compliance
- the length of travel time required to comply with requirements
- the financial costs (such as travel costs) of complying with the requirements, and the person's capacity to pay for such costs
- whether an individual has any vulnerabilities or vulnerability indicators - such as homelessness, mental illness, severe drug or alcohol dependency, or traumatic relationship breakdown that would impact their capacity to comply with MO.
- cultural factors
- any other matters relevant in the circumstances (including disclosure – eg, that they are a victim of family violence)

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

Voluntary work or community engagement options are important to have in the program, but there should be some time frames or limitations on them to avoid people sitting for years on suspension whilst undertaking these options.

There is a current situation where people on indefinite suspension are referred to a provider, even though there is nothing the provider can do while the person is suspended. Providers are currently required to manage these clients without receiving any fees for doing so. People should not be referred while on suspension unless the suspension is less than 3 months. If the suspension is extended, the client should be able to be returned to Centrelink for allocation to a provider only after the person is ready for employment.

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

Consider adding additional 'Pathway Outcome' categories. These could be linked to the assessment processes (ESAt/JCA) to ensure they are not inappropriately considered an option for all clients. For example:

- Long term volunteer work placement
- Supported Employment placement

This would allow clients to meet their own aspirational outcomes that might otherwise be discouraged by Providers. Currently these options do not provide an outcome and will negatively affect Star Ratings if the client exits without a payable outcome.

Eligibility for these additional outcomes would be in addition to the current assessment outcomes:
- Funding level (for service fees)
- Employment benchmark hours (8, 15, 22, 30). Note, the current 23-hour benchmark should be reduced to 22 hours, as 23 hours does not recognise the increasing prevalence of 7.5 hour days, resulting in a 3 day pw job not meeting benchmark.

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?

Funding arrangements need to take into consideration:

- Staff labour costs, including need to train and develop suitable staff.
- Overheads
- Compliance requirements (including gaining and maintaining the Right Fit For Risk modified ISO27001 accreditation)
- Flexibility of service requirements
- Risks vs rewards

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?

Better recognition of participant aspirational goals and partial outcomes (as per 7.1.)

Bonuses to outcome payments for placements in occupations with recognised skill shortages and skills in demand.

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

Include a client CSI score based on customer survey feedback at completion of period of service as part of star ratings or as something parallel to that.

Introduce a "touch point" longitudinal system of assessment and a continuous improvement practises model – building an appreciation and recognition culture

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

Current Ongoing Support funding at the High level does not recognise the length of time that may be required to support a person's employment beyond the need for an average four contacts per month.

Specifying the upper service limit to High Ongoing Support would make it easier for clients to access NDIS funding once it can be established that the supports required exceed those available under Ongoing Support.

Consider establishing an incremental funding arrangement based on progress milestones

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

Speaking from our own experience as a specialist DES provider:

- Employ staff that understand the impacts of disability, and ensure they are trained in the use of adaptive technology and workplace modifications available to assist participants to gain and maintain employment.
- Listen to clients to understand their needs and barriers and work with them as individuals.
- Engage participants in job searching activities that are achievable and realistic to that person's capabilities.
- Build in a development approach with supporting learning, increase individual skills and ability
- Provide "interval support" as needed in line with understanding individual need
- Be flexible to family members of people with disabilities
- When setting meetings, check accessibility

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

- Transparency needed around resources and services available
- Defining generalist and specialist providers in the market and allocate appropriately

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

At present, providers are required to focus on achieving outcomes for their clients (for income and Star Ratings) while managing compliance with DES program guidelines. Unfortunately, DSS appear to be more focussed on punishing providers for administrative failures than rewarding innovation and continuous improvement. An example of this includes the practice of recovering a full fee for a three-month service if even a single fortnightly appointment is not completed.

To enable providers to focus on their main purpose, which is assisting people with disability to gain and maintain their employment goals, the 'punishment' needs to fit the 'crime.' For example, if six appointments are required for a service period, then only 1/6th of the fee should be eligible for recovery for each appointment not completed correctly, not the entire fee.

Formal recognition of innovation and continuous improvement by the Department could be included in organisational performance reviews. Such acknowledgement could be used by providers in their marketing to attract participants and employers, and used as supporting material when tendering for business.

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

To improve transparency and collaboration, providers should have the ability to discuss interpretation of program Guidelines both prior to and during quality assurance activity.

Clerical and administrative errors by providers should not result in recovery of fees and should instead be addressed through provider performance reviews. Fee recovery should only be utilised where services were not provided or were claimed incorrectly.

Sanctions should only be utilised for instances of significant ongoing negligence or intent to defraud.

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?

Changes to program guidelines that impact the ability to claim or retain fees, or directly impacting provider assessment processes (for example, Star Ratings model) should be the subject of a variation to agreement.

On a related note, changes to Guidelines need to be promoted to providers via email communications. They should also be included in the news/latest updates section of the Provider Portal. Providers should not need to conduct searches to identify whether any Guidelines have changed.

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?

One of the biggest issues with recruiting effective disability employment services staff, is the rigid and often unnecessary complexity of the guidelines. For example, in the pre-2018 DES program 6 contacts were required in a three-month period. However, from 2018 that guideline still required 6 contacts, but now stated that there must be two contacts in each month.

For disability employment services to be considered a valuable or preferred option for staff, the program needs guidelines that provide general guidance, not rules stating specific limits and parameters to be met.

Workforce capability can be improved through effective training and development within the organisation, as well as access to training materials available through the Department's Provider Portal and Learning Centre.

Organisations that are person-centred, have developed inclusive succession plans and promote accessible pathways will be better able to attract quality staff.

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

Disability specialist providers are essential for ensuring effective servicing of their cohorts. For example, sensory specialist will have access to the equipment and expertise required to support their client groups and support that person's independence. For example, a deaf person will be able to communicate using Auslan, and a blind person will have access to screen readers and magnifiers.

9.1. What will success look like for:

a) people with disability

- outcomes they want to achieve
- having and/or keeping a job
- self-satisfaction – feelings of worth and value

b) the community

- integrated services
- strengthening supports
- creating "eco systems"
- increasing opportunities for employment

c) employers

- increased productivity

- a universal social responsive workplace
- break down stigma around disability

d) service providers

- fostering a culture which stimulates and reinforces job retention
- increasing the use of new technologies to accommodate individual need
- a connected community

e) Government

- Better understanding of the barriers that providers need to address with participants from time to time to help move them forward.
- Creating a cohesive employment environment

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

- Feedback from employers and clients.
- Baseline data against KPIs and targets
- Quantitative and qualitative data
- Good news stories

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

- Feedback from clients and employers
- Establish an interval reporting cycle demonstrating achievements
- Benchmarking
- Surveys
- Observations and reflection reviews
- Peak bodies – review and discussions
- Market research

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 should this information be made available?

- Marketing services is the primary responsibility of each provider
- Establish online directories of service providers, including their specialisations
- Develop matching tools – utilising technology platforms
- Information/education