



SYC Ltd - DES CONSULTATION SUBMISSION

Introduction

SYC Ltd (SYC) welcomes this opportunity to respond to the consultation for the new Disability Employment Support Program. SYC was founded in 1958 to support young people experiencing disadvantage. Since that time, we have expanded to deliver services to Australians of all ages experiencing disadvantage, with an expertise in delivering high-quality employment services on behalf of the Australian Government.

SYC currently delivers: Disability Employment Services (DES), jobactive, Transition to Work (TTW), ParentsNext, the Sticking Together Project, as well as School Leaver Employment Supports (SLES) and other individualised supports to NDIS participants. Our feedback has been compiled based on this extensive experience and our research into best practices supporting disadvantaged job seekers into employment.

General Feedback

SYC delivers DES in South Australia, Victoria and New South Wales. Our experience is that DES is a generally successful program that supports people with disability into employment and helps to build the confidence and capacity of employers to employ people with disability in open employment. However, our view is also that DES will benefit from reform. Specifically, DES will benefit from:

- Reforms to the assessment process, to ensure that people with disability most in need of supports are efficiently referred to the support they need;
- Consideration of whether ESS and DMS are combined into a single program;
- Rationalising and reducing the significant administrative burden placed on both providers and employers;
- Increasing the DES Wage Subsidy to align with those paid for jobactive job seekers;
- Early intervention for young people with disability will reduce youth disengagement;
- Introducing the Points Based Activation System.

SYC thanks the Department for the opportunity to provide feedback.

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

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

Unemployed and underemployed people with disability who require supports and intervention above and beyond the services offered by mainstream employment services should have access to Disability Employment Services (DES). It is our view that categorising someone as having a disability should not result in a guaranteed referral to DES, as many people with disability could be appropriately serviced within Enhanced Services.

In considering opportunities for efficiencies and more appropriate employment servicing options for people with disability, SYC believes that diverting these participants to an alternative program should only be undertaken once a robust assessment which captures the individual's needs has been completed. This will ensure that the needs of DES participants will remain at the centre of the program.

Participants with an assessed benchmark (BM) of 30+ hours should still be able to access DES. Anecdotally, we have had 30+ hours DES participants, who could have been assessed at that BM level and who have had multiple and complex barriers and health concerns. Current assessments do not identify the ability of these participants to navigate online systems. Without this knowledge, their multiple barriers, such as IT system proficiency, health related issues, and very long-term unemployment, should be a factor of consideration that enables 30+ BM participants the option to choose a DES provider.

The current assessment process leads to an inconsistent and subjective result, affecting the funding level and program referral for DES participants. We propose a new assessment process that achieves a more consistent outcome for both participants and providers.

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?

Yes, but these pathways should be options for participants to consider in consultation with their providers and should not be mandated gateways.

Volunteering, community engagement, and unpaid work experience are an important tool for learning and practicing skills for work, provided there is suitable structure. The right of a person with disability to choose whether they work casual or part-time should be a consideration based on their personal circumstances and an understanding of the need to balance their benefit entitlements. This is of particular importance for people with disability that may interrupt their consistent work capacity, such as psychosocial disability.

The flexibility for providers to tailor servicing to accommodate these activities and have these measured as a part of performance, would assist providers to create meaningful engagement, creating wider community supports and independence for participants.



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?

Progress fees currently available within the New Employment Services Trial (NEST) aligned with vocational and non-vocational activity engagement, would assist with identifying, acknowledging, and celebrating the small wins towards employment goals with DES participants.

Where an individual has capacity, aligning access to programs such as EST, CTA and PaTH internships would be beneficial.

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?

In our experience, many young people who would benefit from NDIS employment supports (for example, School Leavers Employment Support), do not have an NDIS plan or do not have an employment goal in their plan. The process to change or review plans to include employment supports takes between 3-6 months. It would help if this process could be fast-tracked or simplified for a participant to access employment supports more quickly.

There is also a gap in unfunded supports required to help young people and their parents access the scheme. Many Local Area Coordinators (LACs) seem unable to provide adequate support to assist young people and their families through the NDIS access process.

Access to the NDIS, and support to fast-track review processes for young people will support their transition from education into employment and complement other support services, including the future DES program.

2. How can we simplify entry to the disability employment support model?

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

A strengths-based approach to assessment and referral into the right employment service will improve access. The current process identifies an individual's barriers and challenges to finding employment. We suggest an alternative assessment process, whereby participants are aligned with providers based on their ability/capability rather than their disability and barriers. It is our view that this change in approach and messaging could present participants with a different mindset about their disability and their employability.

We propose that assessments are conducted by a relevant allied health service professional, aligned to the disability type. Face to face assessments would be preferred and allow the participant to be more forthcoming with information and enable the assessor to read body language and tone, which can be challenging with phone or online assessments.

Currently, once ESA recommendations are reported, it can take up to 28 days to finalise. Within this period, and sometimes longer, pending DES participants remain connected to their



jobactive provider. In many cases, the jobactive provider (or Services Australia) need to enact the recommenced referral. This causes confusion to the participant, and unnecessary delay in the transition of service to a DES provider. The ESSweb system should automatically finalise the ESA and the recommendations, including generating an appropriate referral of the participant to the appropriate service provider.

Making a referral to ESAs an easier and more available process would ensure the assessments remained valid, accurate and the participant receives the appropriate level of support.

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

Mental Capacity and Physical Capacity are essential for assessments to consider.

Housing is critical to achieving employment outcomes for people with disability. People with disability are the largest social housing cohort and also a cohort at high risk of homelessness. Research suggests that if a person with disability has housing, they are much more likely to work.

Other key assessment considerations should capture family, friend and community supports available to participants, access to transport, working from home options and NDIS eligibility, which would assist providers to determine what kind of supports can be leveraged or need to be created for the participant to work towards employment goals.

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

A review of whether DMS and ESS programs are needed as separate programs should take place. Tailored support should allow flexibility within one program for participants and providers to capture the changing nature of individual disabilities and their management

The assessment should identify the participant's need, be that vocational or non-vocational. Providers need to be prepared to engage with participants' vocational needs, specifically where a direct outcome is not achievable.

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?

Different types of assessments are not needed throughout different stages, however, assessments need to be available to participants more frequently throughout their registration period with a provider, to accurately capture their progress and review their work capacity.



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

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?

It is our experience that the best supports are tailored individualised supports that provide flexibility for providers to engage services and activities to address soft and hard skills required for training and employment. DES providers are in the best position to provide this support: our employment consultants and mentors engage on behalf of participants to help them connect with employers, training organisations, allied health care services, and community services. DES providers offer individualised supports by experts in the fields of disability and employment, who understand the complexities of the barriers experienced by people with disability, as well as the local labour market.

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

Recent Longitudinal research on DES participants found that DES participants highly valued support to gain qualifications and skills because they found that a lack of qualifications, skills and experience greatly affected their ability to find and maintain employment (Australia's Disability Employment Services Program: Participant Perspectives on Factors Influencing Access to Work, 2021).

Any DES reform needs to strike a balance between allowing participants to engage in education, training, and other skill building activities, providing suitable financial incentives to providers, and ensuring participants are making progress towards employment.

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)?

Flexibility within the DES program to recognise that the progress participants make in these areas creates a strong foundation for sustainable employment opportunities.

Providers need to be encouraged to take a holistic view of the participants wellbeing, as it is not one factor that prevents them from getting a job. The approach to getting them support needs to be broad. Providers should have a network of vocational and therapeutic supports that they use as referral pathways to address the needs of participants.

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?

Supports for mature aged people with disability need to include:

- Support to understand their transferrable skills and how they can utilise these in new roles and encore careers;



- Digital literacy;
- Confidence building so to not undersell themselves or their experience;
- Advocacy and promotion of the benefits of hiring a mature age person in the workplace; and
- Support to access workplace modifications so they can access their workplace. This also includes supports to modify home-based worksites.

4. What employment services and supports would most help young people?

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

It is our experience that when immediate intervention does not occur for young people with disability (for example, youth with autism or developmental delay etc) they can become quickly disengaged and lost in the system. The assessment process fails these young people as it begins over the phone, their self-advocacy is poor, and as a result they often end up in jobactive rather than DES, which can be an inappropriate service environment for them. In these situations, mainstream employment providers often take a long time to identify the additional supports required, and the supports implemented are often unsuccessful.

Funding Level 1 (current) is not commensurate with the high level of supports required for many of these young people. For example, intellectual disability is a significant barrier that does not seem to be recognised by the current assessment tool.

It is our view that young people with a disability need to be supported during transition periods, because six months 'lost' in the system can result in months and sometimes years of work on the part of DES providers to get them back on track.

Our research and experience has found that early and often exposure to work, employers, and career-related thinking and experience influences the successful transition of children and young people. For young DES participants, this early intervention is even more critical, as young people with disability are less likely to complete Year 12 and to enter into employment, although research shows they have the same ambitions as their peers without disability. Access to DES at an earlier stage (for example, Year 9 or 10), complementing curriculum around employment and careers would improve the employability and transition of young DES participants over the long term.

Flexibility to create opportunities for young people to choose activities, training, and work experience opportunities that improve their employability is essential.

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

Access to short paid work trials, internships and work experience programs assist with building confidence and broadening scope of opportunities.



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

Young people transitioning from school to work can get lost within the 'system' and it takes an extended period to come across to DES. We recommend a strong focus on ensuring that young people with disability who are eligible for DES are placed in the correct service and funding level from the beginning of their employment journey.

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

We propose a program within the education system to assist young people with disability to understand broadly the nuances and expectations workplaces have in relation to soft skills; written, verbal and non-verbal communication, and coping and resilience techniques for work.

We also believe that more targeted education for schools is required in order for young people with disability and career counsellors to understand DES is a referral pathway.

5. What support do employers need to attract, employ and retain people with disability?

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

It is our view that strong advocacy by providers will help to support employers' understanding of how such workforce participation can be achieved. It is well accepted that people with disability can be some of the most reliable and loyal employees. There is an opportunity to increase the education of employers and industry on these benefits and to try something new, with many unable to meet current workforce demand.

Employers will require additional supports to fund training, either via wage subsidies or other funds. Subsidies should be competitive with jobactive/NESM wage subsidies. The current DES wage subsidy of \$1650, when compared with \$10,000 in most instances is not as attractive to employers. The DES wage subsidy incentives for employers should reflect the fact that DES participants need, in most cases, more supports, education and assistance from employers and providers once they commence employment.

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?

Employers should be educated on the benefit of employing all people with disability, including mature age employees with disability, as well as helping them to alleviate perceived risks, short term wage subsidies, initial support to offset the initial reduction in productivity and training requirements.

We know that employers also want to engage with employment services providers who understand their business and what they are looking for in candidates. Disability



Employment Services can meet these demands by implementing strong engagement with the employer in the 'understand my business' phase.

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?

Industry led collaboration, in which providers work in partnership with large employers who are educated in the benefits of employing people with disability, is best practice in DES. DES providers should consult with all parties and communicate well so that all parties understand the level of commitment and obligations for the project to be successful.

The High Growth Jobs Talented Candidates (HGJTC) initiative developed by SVA is one example of how this can be implemented effectively. The model is demand-led and starts with engagement with the employer, to understand their needs and then design roles that people with a disability can be matched to using a broker between the employer and the participants.

The model involves four stages:

1. Engaging potential employers to help them understand the value of hiring people with disability
2. Equipping employers with the required knowledge about potential barriers people with a disability might face in their organisation
3. Developing plans to support the accommodation for their needs
4. Work ready candidates are then delivered by the broker for the roles identified and assistance is provided in implementing any employee support plans.

The model is then reviewed on a regular basis with the employer to ensure ongoing implementation of new recruitment and retainment strategies for people with disability.

The model showed positive progress in building employer awareness of the skill level and talent of people with a disability leading to the identification of suitable roles at the organisations and job commencements.

The model requires significant investments of time from the employers and the brokers to embed the practices and drive the change required. A revised DES model could invest more in these industry broker roles to engage directly with employers to help them to understand the benefits of employing people with a disability, how their skills and abilities can meet their needs, and then work with providers to find the right participants.

<https://www.socialventures.com.au/sva-quarterly/substantial-capacity-building-of-employers-is-needed-to-grow-disability-employment/>

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

Employers would benefit from having myths dispelled regarding employing a person with a disability, how common disability in the community is, and how to have productive and positive conversations with someone who discloses they have disability. Provider led



Disability Awareness training would help to break down barriers and misconceptions that surround disability and employment. Consultants can educate employers about supports available for the workplace to assist both employer and participant.

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

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

The Points Based Activation System (PBAS) used in the NEST region should be considered for DES. Compared to the current demerit system, PBAS provides a more flexible, tailored approach to supporting a participant's mutual obligations.

Under the PBAS model, the participant will have more choice, control and independence to make decisions aligned with what they are comfortable with. Being a rewards-based rather than penalty-based system, buy in from participants is higher, it promotes a sense of empowerment and increases the feeling of achievement when short term goals/requirements are met. It is our view that this sense of personal accountability will help move participants closer to employment.

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

Currently, DES participants are not eligible for Regional Employment Trials or Local Recovery Fund Programs funded by DESE. Many of these programs are innovative and offer additional supports that are tailored to the local labour market and to participants with additional needs. These programs would be of benefit to many of our participants to connect and be supported in employment opportunities

7. How can funding arrangements incentivise good work outcomes?

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?

Funding can be made available to providers to invest in a range of supports for DES participants with wage subsidies made simpler to access and administer for employers.

Service fees for providers should not be paid in advance with the administrative burden on providers to ensure that service fee claims meet the conditions/guidelines to claim the service fee with supporting documentary evidence to be held after the fact.

We propose that service fees should be paid after the Department's system identifies that the conditions to claim service fees are met (i.e. Job Plan reviewed and updated quarterly



and required quarterly appointments created, attended and resulted as specified by the Department).

With the removal of education outcome claims, providers should be incentivised to progress participants through an array of activities and experiences, including education activities, soft skills development, referrals/commencement in activities to address vocational and non-vocational barriers to employment.

These 'Progress Payments' could be linked to regular ESA reviews or they could be linked to Activity Management in ESSweb, or with the PBAS as trialled by the NEST.

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?

The inclusion of progress outcomes could drive more activity and education referrals to skill up participants for work.

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

A range of performance measures can be rewarded that speaks to demonstrated progress of participants in vocational and non-vocational areas of the program.

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?

Due to the changing nature of supports required at any one time, ongoing support should provide flexibility that acknowledges longer periods of relative stability can often be punctuated by times when intensive ongoing support is required due to changing work environment or participant circumstances.

8. How do we drive high quality services and supports?

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

The number of providers in the market has created small caseloads, inconsistency of service and on some occasions confusion for employers working with many different organisations.

Business should be allocated based on demonstrated capacity to deliver the prescribed services. The market remains oversubscribed, which has had an impact on our communication/relationship with the Department and opportunities to engage. It's important that providers have strong communication with their funding body. Reports and performance



data do not accurately represent the challenges and some of the great work we do. We are a provider that values an open and supportive relationship.

The current number of providers and smaller caseloads can impact on a provider's ability to invest in projects, can create resourcing challenges, and confusion and frustration within industry with employers who are bombarded by service providers.

It is our view that a reduction in the number of providers will increase capacity within the sector and also increase DSS's capacity to effectively account manage providers.

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

Project funding within the program will allow for more trials and innovation that will create sustainable models and employment outcomes.

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

The existing quality framework meets those requirements.

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?

Licensing model based on quality of service and performance with high performing providers awarded continuity of service and low performing providers losing/reducing their licence to deliver.

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?

Less unnecessary red tape and administration will enable providers to support staff to focus on the fundamentals of the job. Providers should invest time to understand the key characteristics and skillset of a high performing consultants.

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

If providers have the capacity to take an individualised approach it negates the requirement for specialisation.

If providers were able to have a larger market share within a program that offered flexibility of servicing, providers could offer a suite of services (programs, initiatives, and collaborations) which consultants could seamlessly adapt to each participant's individual circumstances. This tailored approach would remove the need for specialist providers and would also help service the needs of participants who have coexisting disabilities and conditions. Providers should



build relationships with key stakeholders for more complex value add services, short term supports and co-servicing arrangements as needed.

It could be argued from DES Star Ratings that most specialist providers do not attract the cohort participants, nor place them into sustainable employment at a rate that validates the effectiveness of a specialist provider.

Reducing the specialist contracts and limiting to only highly complex cohorts would ensure more people with a disability have access to adequate and relevant supports.

9. How do we measure success?

9.1. What will success look like for:

- a) people with disability
- b) the community
- c) employers
- d) service providers
- e) Government

a) People with disability: On an individual level, success of the DES program will look like people receiving the support they need to obtain industry specific skills leading to workforce participation, and on a systemic level, success will look like an improvement in the national gap in employment participation.

b) The community: Improved support to improve the barriers affecting the employability of people with disability, and improved advocacy and understanding of the barriers to employment affecting people living with disability.

c) Employers: Increased confidence of Australian employers to integrate and welcome people with disability into their workforce, led by an education program by DES providers and DSS.

d) Service providers: Achieving highly performing DES contracts and strong results for our DES participants, measured by an increase in placements and outcomes for DES participants. Delivering individualised, flexible supports without the burden of excessive red tape and an over complex service delivery model.

e) Government: Reducing the unemployment rate of people with disability in Australia and reducing the cost per employment outcome of DES by reforming the program to a more flexible, innovative, and user-friendly program that achieves all of the above.

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

Data on the following keys aspects would help to measure the effectiveness of the program:

- Placements of DES participants into employment and sustainable employment outcomes, including longer term retention, career data and enterprise achievement



(people with disability are 40% more likely to start their own business than the general population due to their need for flexible employment)

- Participants who have gained industry relevant skills and are closer to employment, including education and training placements and outcomes
- Non-vocational outcomes, such as measurements of progress against barriers (health and disability, personal, financial, housing, family and other barriers to employment)
- Success of employer relationships and collaborations in each region

Infrequent performance data throughout the current contract has not provided the ability to measure the effectiveness of our service delivery against that of our local competitors. The release of star rating data has been delayed to an extent where the information becomes irrelevant.

Performance data that is timely and accurate is critical to establishing the effectiveness of the program and allows for real time strategies to be implemented and improvements to be made.

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?

People with disability need:

- Clear information on providers available - location, services offered, specialisation, experience
- Accessible information in different formats, including. easy English and in languages they can understand, as well on websites that are accessible for people with vision impairment and other disability specific needs

Employers need:

- Clear information regarding what DES is and what the role of a provider is - There could be a government lead national campaign that supports providers and educates employers
- Providers who are simple to contact and easy to work with, who promote their service offering and articulate how their service offering aligns with the employers resourcing requirements.