



Sureway response to the
**Disability Employment
Support Model**

Consultation Paper

November 2021



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Acknowledgement of Country

Sureway Employment and Training recognises the rich Indigenous heritage of this country and acknowledges the Traditional Custodians of the land on which we work and live.

We pay our respects to their Elders both past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples. Sureway Employment and Training acknowledges the past, recognises the present and looks forward to contributing to a brighter future.



JOURNEY ALONG THE WATERWAYS

Aboriginal peoples' value to water is sacred, deep and necessary for survival. It is protected by lore which provides a system of sustainable management ensuring healthy peoples. Each person is on a journey, to learn their culture and heritage but also gain knowledge and experience in modern Australia.

Rivers are traditionally important routes, providing food, water and shelter. Gaining knowledge is like a river (Bila) always moving forward. It could be rough at times but can also be calm and gentle. Never underestimate the undercurrent, snags and logs.

The orange (U) symbols are the staff of Sureway supporting each client to gain educational knowledge, build their self-esteem and build capacity and capability in their chosen fields of work. The colourful circles represent a ripple effect of that journey.

Be proud of self, family, the wider Aboriginal community and a sense of Reconciliation.

LUKE PENRITH - Artist



Introduction

Disability Employment Support Model

Response from Sureway Employment and Training Pty Ltd (Sureway)

Sureway thanks the Department of Social Services (DSS) for the opportunity to provide feedback on the Disability Employment Support Model Consultation Paper.

Our purpose and vision are to change lives and build stronger communities by being the best provider of employment and training solutions in the country. We do this by delivering innovative employment and training solutions to meet the needs of Participants and employers.

In line with our purpose and vision, we have been providing Disability Employment Services (DES) under Government contracts since 2003. We also deliver services under the National Disability Insurance Scheme (NDIS). This hands-on experience provides us with a unique perspective of the needs of the individuals with disability, their families, and carers.

Sureway believes in an individualised employment support service for people with disability, one that recognises the strengths and capabilities of the Participant. DES, as a stand-alone program, should be the flagship employment service providing people with disability the specialist supports that allows them to gain and sustain employment.

Whilst the Australian Government remains committed to a Disability Employment Services program, any reforms to the sector should be part of a process of continuous improvement and best practices, rather than cost saving alone.

In this paper, we seek to address the positives of the current model and suggest enhancements for DES 2023. Please consider our response (following) in the design of a new disability employment support program. We are excited to be involved in developing and supporting any program improvements and look forward to further engagement with DSS.



Eligibility and Access to disability employment supports

An effective eligibility and assessment process is crucial to ensuring that all people with disability can access targeted employment supports. Around 4 million Australians live with a disability and increasing DES participation was a key objective of the 2018 reforms. As a result of these reforms, there has been an encouraging increase in the DES program from 193,441 Participants in June 2018 to 314,204 Participants in December 2021 under the current contract.

However, the mid-term review conducted by Boston Consulting Group (BCG) recommended limiting volunteer eligibility as a potential cost saving benefit, and the subsequent changes to the eligibility criteria has resulted in some people with disability not having access to DES. The impact of these changes is highlighted by a declining DES national caseload. The June 2021 caseload was 315,926 compared to the December 2021 caseload of 314,204.

Limitations around DES eligibility reduces the ability for some individuals to have choice and control over the services that would allow them to improve their life and prevents them from entering the workforce.

Eligibility and Access Recommendations

Access for all people with disability

All people with disability should have the right to access a standalone, specialist disability employment service. Prior to July 2021, Providers were able to assist more people with disability via direct registration, regardless of a Participant being in receipt of income support. Eligibility for DES should not be reliant on a set of measures that reduces access, rather a set of measures that increases participation including access for all volunteers with a disability who wish to participate in the service and find work.

Eligible School Leavers

We recommend maintaining the Eligible School Leaver policy with a focus on streamlining entry, earlier access for eligible students, clearer communication, and a reduction in administrative burdens to increase access (further recommendations on page 10).

Over sixties included

BCG recommended limiting DES to those Participants under sixty years of age. With increasing mature age referrals and increasing market demand for labour, we strongly recommend that the over sixty cohort remains a part of DES. From our experience, regional and rural areas greatly benefit from a mature age workforce, particularly in the current environment where there is increased employer demand for labour.

NDIS

The NDIS Participant Employment Strategy highlights the goal of enabling 30% of working age Participants to be in paid work by June 2023. However, the BCG Mid-term Review of DES identified



that only around 5% of NDIS Participants are in the DES program while 33% of working age NDIS Participants have a work-related goal in their plan.

DES is an important complimentary service and can play a significant role in assisting NDIS Participants access the labour market. If there is to be a significant approach to increasing NDIS Participant employment rates, Sureway recommends:

- The development of clear information about how NDIS and DES will work better together as proposed in the NDIS Participant Employment Strategy 2019-2022
- Educating NDIS Providers on the importance of DES and ensuring employment related supports are included in plans
- Clearer localised referral processes in place
- Ensuring that the DES model is equipped and funded to respond to higher needs Participants

Improving the Assessment process

Accurate and effective ESATs are critical to matching Participants with the right employment supports. Concerns were raised prior to the 2018 reforms regarding the quality and consistency of ESATs. Unfortunately, these issues are still present in 2022.

BCG, as part of their ESAT review paper in 2020, also highlighted issues in the assessment process. They concluded that while ESATs are carried out to a high degree of professionalism, there was evidence of variation in decision making, potentially due to unclear and generalised guidelines and assessors having different levels of understanding. They also acknowledged the challenging task of assessing the diverse set of ESAT Participants.

From our experience, challenges associated with the assessment process include:

- Inaccuracy of assessments leading to referral into the incorrect service, unrealistic service levels and incorrect benchmark hours that do not reflect a person's work capacity
- Timeliness and availability of ESATs that ultimately delays access to supports, particularly in regional areas where we operate
- Confusion and frustration caused by being referred to both DES and mainstream services

BCG recommended tightening guidelines, clearer criteria increasing the ESAT quality assurance process and clearer communication of priorities across assessors. These recommendations would result in a net reduction of referrals into DES of between 2-7%, translating to a reduction of DES spend of between \$25-90m by 2022-2023.

While Sureway agrees with most of the recommendations regarding changes to assessment criteria, it is important that cost saving objectives don't dictate changes. From our perspective we recommend:

- Incorporating a strength-based assessment going forward, providing that the assessment considers the support requirements of the individual including the need for ongoing support
- A standardised process ensuring each assessor has the same level of understanding
- Increased capacity of the agency completing the assessments allowing more time for a thorough review
- Assurance that those with a 30hr+ benchmark referred to mainstream services have been accurately assessed



- Implementing strategies to decrease waiting times in regional and rural areas such as introducing identifying priority areas in rural, regional, and identified high needs areas
- A streamlined assessment process resulting in either DES or a mainstream service receiving the referral, not both
- Limiting use of non-face-to-face channels for assessment, as our experience suggests that disclosure of medical information over the phone is stressful and difficult for the Participant. Participants are often more likely to disclose critical information later in their journey
- Enhancements to the assessment process doesn't limit entry into DES



Services and Supports

Surreway agrees that supports and services should be tailored to help individuals with disability to prepare for work, find employment and get the support needed to maintain employment and progress their career.

Whilst existing features of the current DES model ensures that both vocational and non-vocational supports are central to the service, the design of any new service must consider the broader disability community and ensure that services and supports are suitable for different cohorts across all geographic areas.

Service Flexibilities

While it is proven that early face-to-face delivery achieves increased Participant engagement, Providers need the ability to service remotely via phone or digital platforms where in-person supports may not be the best method for the Participant at that time.

Careful consideration should also be given to DES-eligible Participants being referred to digital services via the New Employment Services Model (NESM). In our experience, there are considerable numbers of mature age DES Participants with limited IT skills that would not be suited for digital self-service arrangements.

While Surreway supports the Australian Government Digital Transformation Strategy, there needs to be a strong focus on not leaving people with disability behind. This has implications for ensuring that people with disability are accurately assessed on their individual abilities and circumstances prior to referral.

Education and training

The Australian Institute of Health and Welfare's Educational Attainment Report 2020, highlights the fact that only 34% of people with disability over the age of twenty have completed Year 12, compared to 66% of those without disability. Similarly, ADCET Report (2019) also emphasizes the small number of people with disability enrolling in Certificate 2 and 3 courses relative to the general population. Following graduation, the graduate employment rate in 2019 after course completion was 52.6% compared to 78.8% without disability.

Education and training are critical to ensuring that people with disability can compete on equal terms in the labour market and secure sustainable employment.

While Surreway agrees in principle with the Star Rating adjustments for DES education outcomes introduced in August 2020, we recognise the value of training in the DES program and recommend the following:

- Maintaining an outcome fee for the completion of a course with an attached minimal Star weighting (Pathway 5% weighting)
- Introducing a broader Education to Employment outcome to increase post accredited training employment rates
- The introduction of Progress Fees (similar to NESM) acknowledging the completion of training, work experience or self-improvement activities
- The ability for Providers recognised as a Registered Training Organisation (RTO) to develop and deliver their own accredited training, tailored to DES Participants and the labour market. All suitable RTOs should be incorporated in an open market arrangement to enable Participant choice
- Introducing training subsidies for employers to negotiate on-the-job training for Participants to cater for career advancement aspirations



Ongoing Support (OGS)

There are 17,261 people with disability in DES that require regular workplace assistance to maintain employment.

DES provides specialist resources and supports to ensure Participants are placed into the right job with tailored post placement support and ongoing support specific to their barriers. Sureway supports significant numbers of DES Participants and employers in the Ongoing Support Phase.

Feedback from our employers indicates that ongoing support gives them the capability, confidence, and support to hire a person with disability and maintain them in the role.

Ongoing Support, or similar programs and services, should be maintained or strengthened where appropriate.

Non-vocational supports

A Participant's non-vocational needs and work readiness should be addressed concurrently so Providers can maintain the Participant's confidence and momentum. In our experience, it is vital to provide non-vocational supports parallel with vocational supports and we believe that DES Providers are best placed to deliver this servicing method.

As a Provider we have also witnessed increasing mental health needs in DES. In the last two years there has been a significant increase in Participants presenting with psychiatric barriers. This has become increasingly difficult to address given the shortage of support services in regional and rural areas.

Sureway asks that the following be considered to enhance the current DES program and allow Providers to better support Participant non-vocational needs, including:

- Allocated program funding to ensure that there is capacity to address the growing mental health support requirements in DES
- Additional funding for Providers to access required supports in regional and rural areas in recognition of the additional costs and challenges of sourcing services



Cohort servicing

Strategies to better support Youth

“A lack of early planning and collaboration between community and employment services and schools, combined with a low expectation that young people with disability will work upon leaving school, contribute to poor employment outcomes for students with disability in Australia.”
(National Disability Services Centre for Applied Disability Research 2017)

There is substantial confusion in relation to the most appropriate employment transition service for school students with disability. While the Year 13 Disability Career Advice Survey indicates that 92% of students with disability want a job, many are not able to access DES assistance to make the transition from school to work. Differing state requirements, administrative burdens, the absence of clear communication, and the confusion of multiple pathway choices (DES, T+W, SLES, mainstream services), prevents a large number of students with disability from participating in DES.

We agree that there needs to be better education, access, tools and information for young people and families. We would like to see:

- DES promoted as the primary employment service for eligible school leavers with disability
- DES as the priority access point for Principals, school counsellors and carers, allowing more students to access individualised transition support. This will involve schools and Providers working at a local level
- Rebranding this component of the DES program specifically for youth. Changing the terminology of 'disability' will remove the stigma for young people. As the World Health Organisation puts it, 'people are disabled by society, not just by their bodies'
- Enhanced support, development and employment aspiration building in the early to middle years of high school, not at the end where it is often too late
- The ability for students to register with DES whilst completing Years 10, 11 or 12, with Part-time work (after school work) recognised as an outcome for Providers
- Consistency delivered through a national approach to disability programs in schools, supported by the states in an effort to reduce red tape and administration
- Flexible delivery options including digital servicing

Strategies to better support mature age Participants

Recent DSS Data identifies that there are more mature age people entering DES year on year. Currently, the Labour Market Information Portal (December) indicates that almost half (45.5%) of the current DES caseload are 50 years and older. This makes mature age Participants the largest DES cohort. We believe that this cohort is also significantly challenged as often they have been out of work for longer. As identified in the BCG ESAI report, assessors are also more likely to refer older individuals to DES.

While the Government has implemented employer incentives and broader structural changes to address this issue, further support will be needed to ensure mature age people with disability have the same opportunities as younger people. Strategies could include:

- Maintaining the avenue for Participants aged sixty years and over to access DES
- Continued subsidy incentives for employers to employ older people with disability such as the Restart program



- Increasing the DES wage subsidy amount for mature Participants
- Greater emphasis on work for mature age people with NDIS plans
- Increasing Ongoing Support allowances for mature age Participants
- Training incentives for mature age Participants relative to digital technology

Focus and care for Indigenous Culturally and Linguistically Diverse (CALD) people with disability

The employment rate for Aboriginal and Torres Strait Islander people with disability is 33.2%, compared to the employment rate of 48.7% of non-Indigenous people with disability. This compares with an employment rate of 78.8% of all people without disability (sourced from the Australian Government Plan to Improve Outcomes for Aboriginal and Torres Strait Islander People with Disability paper).

The current CALD DES caseload is significant at 19%. Outside of the previously identified mature age caseload, CALD is the largest identified cohort.

Given the Government's commitment to increasing employment for these vulnerable cohorts, we ask that the new disability support model pay particular attention to this group through:

- Increased wage subsidies specific to these cohorts
- Employment and training incentives specific to cultural needs
- Increasing the existing Performance Measure weighting for Indigenous outcomes



Employer engagement

The recent release of the Employ My Ability strategy (part of Australia's Disability Strategy 2021-2031) is a significant Government step in providing a framework for employers and the broader community to increase employment outcomes.

Prior to the release of Employ My Ability, the BCG report outlined several areas for exploration that included targeting employer concerns associated with hiring people with disability, designing specific communication campaigns that target employers and alternative policy approaches which engage employers more directly.

While we agree with these findings, there are additional areas to support employer engagement. These could include:

- Capitalising on Employ My Ability through a targeted national marketing campaign to breakdown stereotypes and increase general awareness of DES. As Government develops these programs, we ask that it continue to be mindful of not perpetuating stereotypes in the form of physical disabilities i.e., people in wheelchairs
- Lifting employer understanding of current Government initiatives such as the assistance available to employers under Job Access. The benefits of Job Access Assistance include workplace modifications, financial support, and employer toolkits. Job Access needs to be widely promoted as these supports are under utilised
- Providing examples of the benefits of hiring people with disability. This can include marketing good news stories and utilising employer testimonials
- Capitalising on the Government's release of the Employment Initiatives and Support Strategy that seeks to eliminate the confusion for employers around the most appropriate services to access
- Reviewing the current Government DES Wage Subsidy Scheme value and increasing the amount to reflect the rising costs of employment for businesses
- Providing employers with a DES career advancement (training and development) subsidy after employing the Participant for 52 weeks. This financial assistance can only be spent on upskilling the employee and sustaining employment

Changing attitudes by delivering localised proactive employer education

Some small to medium employers tend to have traditional stereotypes of what disability is. In partnership with our brand ambassador, Scott Reardon, OAM, we have developed Creating Conversation: Disability in the Workplace, a 6-part series that aims to break down common misconceptions about employing people with diverse abilities.

Scott is a successful Australian Paralympian and advocates for others who experience reduced employment opportunities as a result of disability, injury or illness. The series highlights the many benefits a business can achieve through workplace diversity. Employers can watch the video series, download our free campaign resources, and register to become an employer.

Similar to Sureway, we recommend federally funded marketing campaigns, utilising multiple ambassadors with varying disabilities, to assist in educating employers and make it easier for them to employ someone with a disability.



Measuring success

The current DES Performance Model, used to calculate the Star Ratings, is an outcome-based model. In line with the DES 2018 Performance Framework, it rewards DES Providers who drive performance.

The BCG mid-term review identified several shortcomings that need to be addressed. We concur as we experienced these challenges that impacted our ability to measure performance:

- Limited performance reporting in the first 9-12 months of the contract
- The BCG review recognised that delays in the release of ratings reduce their usefulness for Participants and for Providers
- Inconsistent timelines and clarity on formal performance assessments with no clear performance criteria communicated in the early stages of the contract
- Limited transparency regarding panel refreshes

Ratings do not incorporate Participant experiences, or the level of service received. From our perspective, purely measuring outcomes can lead to a Participant churn effect without capturing improvements in the Participant's journey such as work experience, training, and self-improvement activities.

Surreway supports the continued use of the DES Star Rating Model to measure performance providing that the Stars:

- Are released on time to ensure Providers have the ability to adjust strategies to improve performance
- Are accurate and provide opportunities for Participants to enact choice and control when choosing or changing Providers
- Are used to reward high performing Providers and allocate new business
- Maintain a strong focus for 52-week outcomes
- Reflect the Participant's progress to overcome non-vocational and vocational barriers. This could be included as a 'Progress Pathway Outcome' and given a Star weighting

We acknowledge that recent communications around Star Rating and Performance have been timely and informative.

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CHANGING LIVES, BUILDING STRONGER COMMUNITIES

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employment & training