



Australian Government  
Department of Social Services

**Inclusive.  
Accessible.  
Diverse.**

**Shaping your new disability  
employment support program**

**Consultation Report**

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for more information about  
this consultation.



**Artist: Robin Warren**

Robin Warren (b 1971, London) has developed his artistic practice for over 20 years and continues to explore brightly coloured and organically shaped abstract imagery. Warren's works in Copic marker, oil pastel and texta are reminiscent of cellular organisms in bloom that often radiates from a central focal point. Warren often renders multiple layers of colour that create a dream-like state as they reverberate across the paper. Though soothing, his works can have a strangely unsettling visceral or viral quality that is enhanced by his use of unreal and unlikely colour combinations. His work has been exhibited widely and appear in private collections throughout Australia.



## INTRODUCTION

The Australian Government is committed to assisting people with disability into jobs so they can enjoy the social and economic benefits that work brings. People with disability and employers need a system that meets their needs and provides the appropriate supports to find and keep a job. The current Disability Employment Services (DES) program concludes on 30 June 2023, and will be replaced by the New Disability Employment Support Model (the new model).

The Department of Social Services (the department) is currently in the process of designing the New Disability Employment Support Model. The new model will focus on genuine choice and control for people with disability, to help people with disability become ready for, find and maintain employment, and support employers to hire people with disability and ensure their employment is successful. The new model must be cost effective and sustainable, align with other Commonwealth-funded employment programs, and not duplicate assistance available through other disability support programs.

### ***Consultation Process***

The Government is committed to ensuring the needs of people with disability are at the centre of the new model. That is why the department is engaging with a range of organisations as part of the work to reform disability employment support. The department undertook a public consultation process to seek feedback on what the new model should look like. Submissions closed on 1 February 2022.

The public consultation is just one step in the ongoing process to design the new model. The consultation process has included:

- The DES Reference Group, chaired by the Disability Discrimination Commissioner, Dr Ben Gauntlett. Membership includes disability representative organisations, employers, service provider peak bodies, and academics.
- Six working groups comprising members of the DES Reference Group and subject matter experts, who have been considering disability employment reforms through a narrow focus.
- A series of workshops run by Ernst & Young with key stakeholders to support the department's program design and help understand the risks and opportunities for the new model.
- Four workshops on 'what works' in employment support for people with intellectual disability run by Inclusion Australia. Inclusion Australia's final-recommendation report identified inclusive practices for policy makers to apply to the new model design.





- A report by 89 Degrees East, funded through the provider peaks, investigating current good practice in disability employment support and providing recommendations to feed directly into the reform process.
- An engagement process run by PricewaterhouseCoopers (PwC) consisting of a series of workshops with people with disability and carers across Australia, in-depth interviews with employers and employment service providers, and employer surveys that will directly inform the design process.
- A research project undertaken by Services Australia to understand experiences of gaining and maintaining employment for people with disability. The final report focused on the supports and services that help a person with disability in their employment journey.
- A series of seven focus group sessions held by the department with key stakeholders to discuss ideas and key policy questions for the new model. These targeted discussions will continue in 2022.

The new model will also be informed by the cumulative knowledge built from previous consultation processes, including:

- Australia's Disability Strategy
- Disability Employment Strategy (Employ My Ability)
- Disability Royal Commission
- National Disability Insurance Scheme (NDIS).

### ***Purpose of this document***

The department undertook public consultation to give more people a chance to provide feedback on how the new model can best help people with disability prepare for work, find and keep a job, and progress their careers. On 5 November 2021, the department published a Consultation Paper setting out what we know and what we think could help. To view the consultation paper, please visit [DSS Engage](#).

This report summarises the feedback received from public consultation, which comprised of 152 submissions. Submissions were received from a range of individual and organisational stakeholders, including people with disability, their parents and carers, employers, employment service providers, disability advocates, disability representatives and academics. Approximately 40% of submissions were from individuals, and 60% were from organisations.





**Figure One: Individual submissions received by stakeholder group\***

Individuals	
Person with disability	44
Parent, guardian or family member of a person with disability	18
Carer of a person with disability	6
Employer of a person/people with disability	4
Support worker or person who works directly with people with disability	10
Academic or researcher	4
Business owner	7
Disability advocate/employed by a disability peak body or service provider	6
Health professional	4
Government employee	2
Other	3

**Figure Two: Organisation submissions received by stakeholder group\***

Organisations	
Employer	8
Disability advocate	20
Disability services provider	34
Employment services provider	34
Peak body	12
Other	17

\*Please note many respondents identified with more than one stakeholder category.

The department would like to thank everyone who provided a submission, or who has contributed to the broader consultation process. Your input will help to ensure the new model achieves meaningful outcomes for people with disability.

### **Key Issues**

Submissions provided valuable insights on the operation of the current DES program and opportunities for improvement under the new model.

The most common issues raised across public consultation were around:

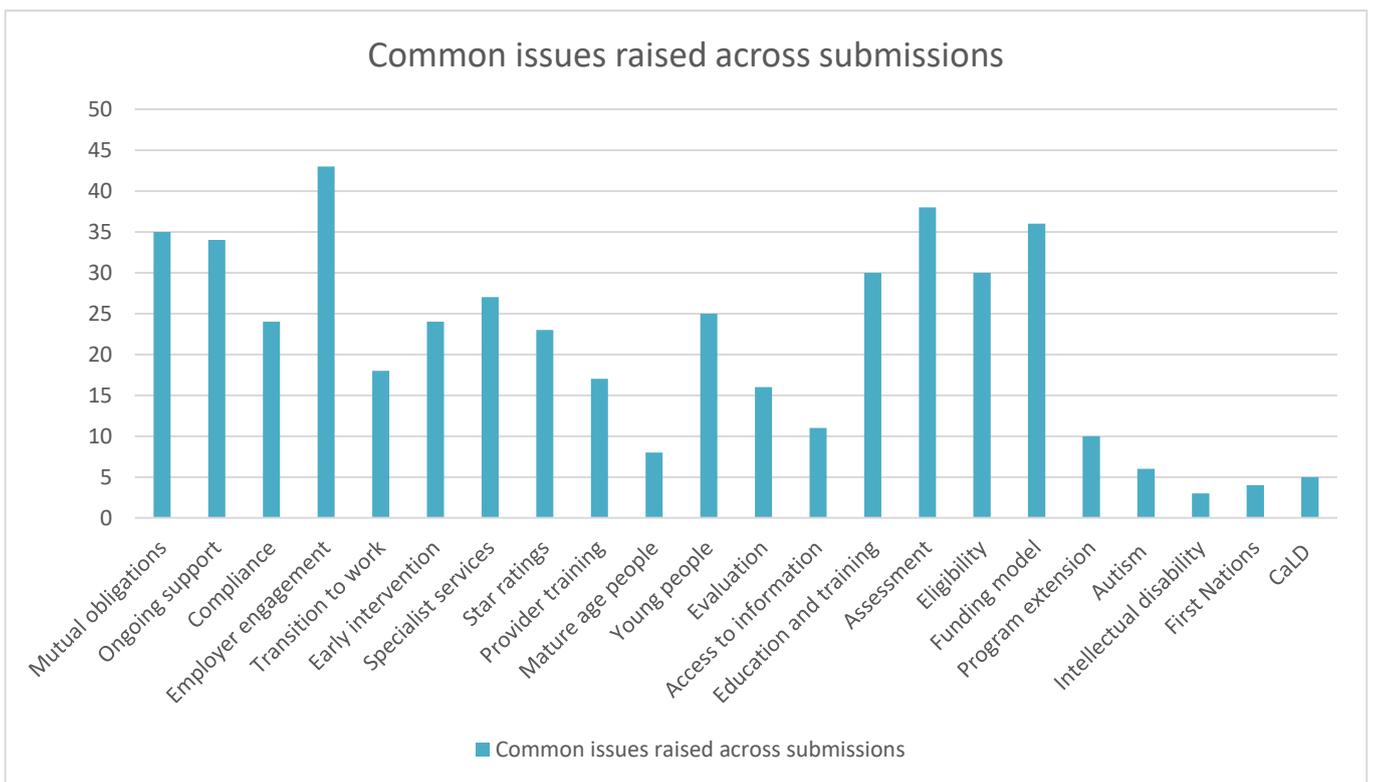
- The need to reduce barriers for people with disability to allow better access to employment services.
- The need for holistic, wrap-around services and complementary supports for people with disability and employers.





- The need for clearer information on different supports available to people with disability and better pathways between them.
- The need for greater flexibility in program and service delivery.
- Targeting support to meet the needs of people with disability and employers.
- Streamlining program administration to reduce the burden on providers, people with disability and employers.
- Views outlining how the program should be structured and funded to achieve long-term, sustainable employment outcomes.
- The need for greater focus on ongoing support for both people with disability and employers after a person with disability is placed in a job.
- The need to develop and retain an appropriately skilled workforce.
- Views on how success should be defined and measured.

**Figure Three: Common issues raised across submissions**





## DISCUSSION TOPIC 1 – ACCESS

### ***The new model should take a broad approach to eligibility***

Feedback from most stakeholders included that all people with disability who need or want employment assistance should be eligible for support under the new model.

Stakeholders recommended:

- removing eligibility criteria for the program related to receiving income support payments, so people with disability can receive support regardless of their income support status,
- re-introducing the option for people to volunteer, and
- expanding eligibility to people with a work capacity of less than eight hours.

Emphasis was also placed on ensuring that NDIS participants who want to work are automatically eligible for DES without the need for re-assessment.

*"The new disability employment support system should be accessible for any person living with a disability, with needs that impact their work situation. Restricting access based on work capacity and income support status denies appropriate support for people in the community." <sup>1</sup>*

In addition, a number of stakeholders suggested that people with disability who are employed and seeking to progress in their role or change jobs should be eligible for support.

### ***The new model should recognise more employment types and pathways***

Stakeholders noted that different work types can be important for building a person's skills and capability, and are reflective of the modern labour market including casual, part-time and volunteering.

*"Community engagement, voluntary work and unpaid work experience are all very important steppingstones into providing experiences and provide individuals with the opportunity to 'try out' different types of work they enjoy and may find paid work in." <sup>2</sup>*

However, stakeholders stressed the importance of ensuring that these options are the choice of the person with disability, are part of a clear pathway to long-term, stable employment and have regulations in place to avoid exploitation.





Individuals with disability in particular also want more recognition and support for self-employment pathways and the development of micro-businesses.

***Maintain separate programs but create better pathways and linkages***

Many stakeholders stated that employment services for people with disability should remain separate from the New Employment Services Model (NESM).<sup>\*</sup> Stakeholders indicated that, while there should be alignment between the new model and NESM, NESM should act as an optional complementary service for jobseekers with disability to ensure supports are not diluted.

A number of submissions raised concerns about NESM's digital component. Many stakeholders noted that it is likely to disadvantage people with disability and that it must be the choice of the individual to access digital services.

Conversely, some submissions were in favour of integrating disability employment services with mainstream supports. They highlighted that this would contribute to ending segregation of people with disability, and would provide employers with easier access to job seekers with disability.

A key theme throughout submissions was a person's right to choose which service they access (whether NESM or disability-specific supports), and while many stakeholders indicated that they want programs to be clearly delineated, they expressed a need for better pathways to move between them.

In particular, a number of stakeholders highlighted the need for better linkages between the new model, the Community Development Program (CDP) and the NDIS to ensure that these cohorts have access to employment supports that meet their needs.

***Create a continuum of employment support between the NDIS and the new model***

Stakeholders indicated that better alignment between the NDIS and the new model starts with clearer information, guidance and training for providers on the services and supports offered by each program, as well as improving communication pathways and collaboration.

*"The Department should work with the National Disability Insurance Agency (NDIA) to facilitate better connections between disability employment services and the NDIS (particularly ADEs), including publishing clear guidance outlining how these systems could work together to deliver better employment outcomes for people with disability."<sup>3</sup>*

<sup>\*</sup> From 1 July 2022, the New Employment Services Model will be replaced by Workforce Australia.





Generally, stakeholders viewed the NDIS as responsible for providing wrap around services and supports to prepare a participant for work, while the new model acts as the interface into employment – identifying appropriate job placements and supporting employers.

Some submissions suggested that NDIS employment-related supports should be delivered by disability employment providers to improve the flow of services.

Stakeholders also indicated that there is a need for better links between the new model and Australian Disability Enterprises (ADEs) to assist supported employees to transition into open employment, where they wish to do so.





## DISCUSSION TOPIC 2 – ENTRY

### ***Review the entry process to ensure assessments are timely, accurate and consistent***

Under the current DES program, people with disability are assessed upon entry to the system to evaluate their needs and capacity to work and determine the most appropriate service to assist them. Participants who have received 78 weeks of employment assistance will undergo a program review to reassess their support needs.

There was consensus from stakeholders that assessments should be:

- **strengths-based:** focus on what a person can do rather than what they cannot,
- **holistic:** consider all aspects of a person's life, including their support networks, access to other services, previous education and employment, their goals and what they think they can achieve, and
- **delivered face-to-face:** where practical, and agreed by the person with disability.

A smaller number of organisations recommended including information sourced from other people in a person's life, such as family or friends, their support workers or regular healthcare professionals.

Stakeholders also outlined that people with disability should be allowed to access disability employment services while awaiting the medical evidence required to complete an assessment, as delays can lead to disengagement from support and loss of motivation.

Most stakeholders stated that the administrative processes around assessment of participants should be reduced. Some suggested that requirements for re-assessments could be decreased for select permanent disability types.

There were inconsistent views on re-assessments, though a large number of stakeholders suggested that the 78-week review should be removed as it is not useful. Preferences for re-assessment timeframes ranged from two years to 'in response to life events' or 'as needed'.

### ***Lack of consensus regarding benchmark hours***





A large number of stakeholders recommended removing benchmark hours as a component of the assessment process while others consider that they could still be useful in targeting supports to an individual's needs if they are uncoupled from compliance requirements.

***Appropriately trained assessors who understand the different programs and the supports and services available***

Stakeholder views on who should conduct assessments differed, though all who discussed this issue agreed assessors should have specialist knowledge of specific disability types to ensure they understand the impact of the person's disability with regards to employment.

*"Assessment guidelines should recognise the differences in people's employment support needs. Assessors with specialist knowledge would be better able to estimate how an individual's impairment would impact on their work capacity."<sup>4</sup>*

Recommendations for assessors include occupational therapists, allied health professionals and specialist staff embedded within employment services providers.





## DISCUSSION TOPIC 3 – SERVICES AND SUPPORTS

### ***Flexibility to deliver supports that meet individual and employer needs***

Many stakeholders provided feedback on what supports and services should look like under the new model. This includes:

- **person-centred supports** tailored to the needs of the individuals,
- strong **on-the-job** and **ongoing support** for both people with disability and employers, and
- a focus on **progression** and supporting people in their career journey.

Some stakeholders raised concerns that the current DES program does not encourage, nor is it flexible enough, to allow supports to be delivered in this way, instead incentivising 'speed-to-placement' to achieve outcome payments.

*"Support for people with disabilities, and their employers, should not cease on the achievement of a fixed week outcome. Ongoing support should be expanded to adapt to the changing needs of participants once in employment and include aspects such as career progression, advancement into better jobs (e.g., in terms of job security and higher remuneration), and continuing improvements to overall wellbeing." <sup>5</sup>*

Several submissions also suggested alternate models of employment support that could be integrated or adapted into the new model. For example, Individual Placement and Support (IPS) or customised employment. Stakeholders considered the use of these models particularly important for people with higher needs or fluctuating disability such as autism, intellectual disability and psychosocial disability.

### ***Supports must be delivered by appropriately skilled providers***

A large number of stakeholders stated that providers must be trained in supporting people with disability, including understanding the impact of their disability and their employment needs, as well as having the skills and experience to assist employers.

They also require providers to deliver safe and culturally appropriate services while considering the effects of intersectional disadvantage e.g. for Culturally and Linguistically Diverse people with disability, First Nations people with disability, and carers.



***The new model should have an increased focus on education and training***

Service providers in particular highlighted the need to focus on soft skills training, as well as industry or job specific training, to prepare people with disability for work, especially those without prior work experience such as young people with disability.

Some disability representative organisations recommended that the new model contain safeguards to ensure that education and training is clearly linked to an employment outcome.

***Wrap around supports are integral to achieving better employment outcomes***

Most stakeholders noted that service providers should have strong relationships with local support services (e.g. health and housing) and clear referral pathways. Some submissions went further and recommended that these services should be co-located with employment service providers where possible.

*"Referral should be core functionality of a DES service. DES providers must have strong connections with referral sources within their local communities. Colocation, case conferencing, and two-way referral are all best practice within DES."*<sup>6</sup>

***Targeted supports for mature age people with disability***

In addition to other supports, stakeholders highlighted that mature age people with disability need particular access to digital literacy training, assistance in understanding the modern workforce and opportunities to re-skill or re-train.

A small number of responses also recommended better co-ordination between the new model and the Career Transition Assistance program offered by the Department of Education, Skills and Employment (DESE).





## DISCUSSION TOPIC 4 – YOUNG PEOPLE

### ***Access to employment services for young people with disability***

Many stakeholders suggested that young people with disability should have access to supports through the new model regardless of their income support status and without assessing their benchmark hours.

However, there were differing views as to how early this support should be available. Some stakeholders indicated that the final year of schooling was sufficient, while others recommended supports commence from age 14 or working age.

*"Young people transitioning from school to work can get lost within the 'system' and it takes an extended period to come across to DES." <sup>7</sup>*

A number of submissions recommended that the new model contain a specific stream that caters to the unique needs of young people, because the style of supports required is different than for older people with disability. Some noted that young people with disability do not want to be segregated from their peers without disability and they should be supported through mainstream services.

### ***Better supports to assist young people with disability to transition into employment***

Feedback from some stakeholders identified that access to relevant work experience opportunities, after school jobs and career development activities is essential for young people with disability.

Stakeholders indicated that these activities must be the choice of the young person, though a few disability organisations specified that they should not be allowed to undertake work experience in an ADE to avoid ending up in segregated employment.

*"Exposure to the world of work through work experience during school education, support to undertake casual work whilst at school and support to undertake casual and/or temporary work throughout secondary and tertiary education are the strongest predictors of sustained post-school employment."<sup>8</sup>*





While some organisations were critical of NDIS School Leaver Employment Supports (SLES) due to the perception it leads to employment in an ADE, a number of service providers recommended that SLES-style supports should be available to all young people with disability under the new model.

Some submissions suggested modelling supports based on DESE's Transition to Work program, which has a particular focus on intensive upfront supports. Stakeholders indicated that they would like the new model to recognise the need young people with disability have for upfront supports.

An IPS style model was also referenced in relation to young people with disability because of its emphasis on access to non-vocational supports to complement employment services.

Other recommendations included the use of peer support and mentoring opportunities, as well as wage subsidies targeted towards young people with disability.

### ***Strong relationships with the education system***

While many stakeholders agreed that service providers must have strong relationships with schools, feedback varied on whose responsibility it is to develop the connections.

Some stakeholders stated it is up to providers to create these links and others suggested schools should be better at reaching out to access supports for their students. It was pointed out that governments may need to facilitate more formal relationships in order to get schools involved.

*"Providers should be engaging with local schools to provide information about services which exist for people with disabilities after they leave school."<sup>19</sup>*

A small number of submissions also highlighted the need for the new model to encourage providers to develop relationships with higher education providers in order to prepare tertiary students for the transition into employment while they are still studying.





## DISCUSSION TOPIC 5 – EMPLOYERS

### *Key supports for employers to hire people with disability*

Feedback across submissions indicates that employers need two key supports from service providers to successfully employ a person with disability:

- **disability awareness training**, and
- **on-the-job / ongoing support**.

A broad range of stakeholders noted that employers require both general disability awareness training, as well as specific training related to the disability type of their potential employee. Disability representative organisations in particular recommended that people with disability co-design and deliver this training.

Stakeholders also want the new model to support providers to deliver ongoing supports to employers consistently over the initial placement period (up to approximately 12 months) before reducing to an as needed basis. This is considered particularly important for assisting people with disability to progress or change roles with their employer.

*“Employers often require just as much support as a DES participant to employ and maintain an employee with disability.”<sup>10</sup>*

In addition, a number of stakeholders emphasised that service providers require more training on how to meet the needs of employers to be able answer questions, communicate the benefits of employing a person with disability and provide support on work health and safety concerns.

*“Support services should be providing employers with easily digestible information on the benefits of hiring someone with disability and answer commonly asked questions.”<sup>11</sup>*

Some submissions noted that the number of service providers is overwhelming for employers, and suggested creating a centralised hub, or point of contact, within the new model to streamline an employer’s access to disability employment supports.





Multiple stakeholders indicated that both service providers and employers need easier access to wage subsidies that are aligned with other wage subsidies available. Stakeholders suggested there is currently a funding disparity between DES wage subsidies and those offered by DESE, which creates a disincentive for employers to choose a person with disability.

A few stakeholders also recommended the introduction of targeted wage subsidies within the new model for disadvantaged cohorts (e.g. mature age people and young people), as well as other potential incentives, such as tax concessions for employers. Concern was raised regarding the use of wage subsidies, stressing the need to remove the messaging that employers should be paid for employing a person with disability.

### ***Providers need better job-matching skills***

Stakeholders noted that it is important for service providers to find the best employment fit for a person with disability by having strong job-matching skills, but by also being able to support employers through job carving or job negotiation activities. They indicated that current DES providers do not perform well in this area and that there should be a greater focus on up-skilling providers in the new model.

*"Often DES providers try to fit clients into existing roles which do not appropriately match their skills and abilities."<sup>12</sup>*

### ***More flexibility to undertake work trials in the new model***

Many stakeholders, including an employer peak body, suggested that the new model should incentivise employers to hire people with disability by offering more flexibility to undertake work trials.





## DISCUSSION TOPIC 6 – MUTUAL OBLIGATIONS

### *Introduce greater flexibility into mutual obligations*

Stakeholders that mentioned mutual obligations agreed that the current measures are ineffective and/or excessive. There were varying responses as to whether mutual obligations should be retained or not.

Some stakeholders suggested that the new model should not contain mutual obligation requirements at all. Others suggested that, with the right level of flexibility, mutual obligations could be tailored to suit the needs of the individual.

Specific recommendations for changes include:

- **removing the immediate suspension of payments** if a person doesn't meet their obligations,
- **greater flexibility** around pausing requirements for people whose disability fluctuates or is episodic,
- **recognising a broader range of activities** that build a person's capacity towards employment (e.g. volunteering and work experience),
- allowing participants to **accumulate benchmark hours over different jobs**, and
- **holding service providers to account** for delivering the supports that people need to meet their mutual obligations requirements.

*"When jobseekers are struggling to find employment and have been in the service for a long time; volunteering, work experience and short courses should be accepted as meeting mutual obligations for a six-month period. This will allow jobseekers to grow confidence, gain valuable experience and make connections with employers."<sup>13</sup>*

A number of submissions suggested the new model could include something similar to NESM's Points Based Activation System (PBAS), to recognise a larger variety of activities under mutual obligations. However, other stakeholders opposed the introduction of a PBAS-style system.





***Service providers should not be responsible for enforcing mutual obligation***

Feedback from the majority of stakeholders highlighted that using service providers to enforce mutual obligations erodes the relationships between people with disability and their providers, making it difficult to build trust, as well as creating an administrative burden that impedes service delivery.

*"The Targeted Compliance Framework (TCF) undermines trust between caseworkers and participants, and creates fear among participants, who therefore aim to minimise their interaction with systems that are purportedly intended to support them."*<sup>14</sup>

Stakeholders preferred that responsibility for enforcing mutual obligations be transferred to Services Australia or an independent third party.





## DISCUSSION TOPIC 7 – FUNDING ARRANGEMENTS

### *Current funding arrangements are too complex*

Stakeholders said that the current funding model is not achieving long-term, sustainable employment outcomes for people with disability. However, stakeholder views differed on how funding should be set out.

Most were in favour of maintaining the 52-week outcome payment, noting that it should be worth more than the 26-week payment, to encourage providers to aim for longer term placements. A small number of submissions disagreed and thought the funding should be directed elsewhere.

*"Funding arrangements for employment service providers should, for the most part, be tied to the outcome of securing long term employment of jobseekers with disability."<sup>15</sup>*

Stakeholders of all types indicated that they would like to see education and training outcomes re-introduced to recognise the capacity building work that providers undertake with people with disability. A small number did not agree, or stated that these outcomes should be worth less than an employment outcome. Others recommended placing limitations on these outcomes to avoid exploitation by providers.

Additional suggestions for funding arrangements for the new model included:

- introducing a **sliding scale or pro-rata funding model**,
- introducing **funding levels targeted at certain cohorts**,
- **bonus outcome payments** linked to placing people into work in industries or areas of skills shortages,
- spreading **outcomes payments across shorter timeframes**, and
- **modelling the funding arrangements on NESM** (e.g. progress fees, higher commencement fees, a long-term unemployed bonus and access to an Employment Fund).

Service providers in particular considered access to discretionary funding to cover the costs of materials and supplies required for a person's employment to be vital in delivering effective services.





One disability peak body recommended that the department undertake modelling to determine the cost of achieving employment outcomes for people with disability to build an evidence base for the new model.

### ***Greater investment into ongoing support***

While the majority of stakeholders agreed that there needs to be a greater investment into ongoing support, they also stated this should be balanced with upfront investment in capacity building.

A small number of stakeholders were in favour of reducing ongoing service fees to allow for higher upfront funding.

*“The current funding and performance framework model is very heavily weighted towards employment placement outcomes, which limits providers’ ability to provide intensive individualised pre-employment support.”<sup>16</sup>*

### ***Streamline funding levels to reduce confusion and target effectively***

Some stakeholders recommended that the new model should look to reduce or streamline the number of funding levels, or consolidate the Disability Management Service and Employment Support Service streams, as they are currently too confusing and ineffective in targeting supports. Not all stakeholders agreed.

### ***Improving provider capability***

A number of responses, mostly from service providers, emphasised the use of longer contracts and higher upfront fees to support provider capability, allowing them to make longer-term plans regarding service delivery.





## DISCUSSION TOPIC 8 – QUALITY SERVICES

### ***Differing views on the new model's market structure***

Feedback from some stakeholders indicated that there should be no cap on the number of providers allowed, while others were in favour of re-instating market share conditions and limiting provider numbers within an Employment Service Area (ESA).

Some responses supported a blended model, incorporating both market share and participant choice.

Additional comments from a small number of stakeholders advocated for the new model to focus more on encouraging collaboration between providers to ensure better outcomes for people with disability.

### ***Encouraging innovation to develop better services and supports***

Service providers in particular were supportive of the introduction of an innovation fund or funding to allow providers to trial new services and supports.

### ***Build in quality assurance processes***

A range of stakeholders recommended the establishment of a Centre of Excellence to provide research and evidence based guidance to government, service providers, assessors and employers.

A small number also suggested the creation of an independent complaints or reporting process that is easily accessible to people with disability and employers. This recognises that the current complaints process is mostly managed by individual providers and is seen as ineffective. Data on complaints could then be used in measuring success.

In addition, service providers were generally supportive of regular provider reviews to ensure that under-performing providers are removed from the new model.

### ***No agreement on new legal model***

While stakeholders were more likely to support a licensing arrangement for the new model, others indicated that the use of grant agreements or contracts is still appropriate.





### ***Streamlining the new model's administrative arrangements***

To improve the delivery and integration of employment services more generally, a number of stakeholders (peak bodies in particular) were supportive of responsibility and administration of the new model being transferred to DESE. This is assuming a separate disability employment support program was maintained.

DES providers currently deliver services in a competitive market, operating across defined catchment areas called Employment Service Areas (ESAs). Some service providers recommended the DES ESAs should be replaced with DESE's catchment system of Employment Regions, for consistency between programs and to reduce oversaturation of providers in particular regions.

In addition, a number of disability advocacy organisations were in favour of removing current geographical restrictions to ensure that people with disability have better access to services and providers of their choosing. This was linked to giving people with disability more choice through greater flexibility in servicing options including phone, email or video conferencing.

### ***Developing a highly skilled and diverse workforce***

Most stakeholders recommended that providers and staff need better training that is designed and delivered by people with disability. Some submissions recommended the introduction of minimum training or qualification requirements, though most were in favour of structured ongoing development to maintain high service standards.

*"Employment Consultants are not provided with any training or support to support and engage with the extensive range of disabilities they are faced with. From manic depression, personality disorders, PTSD, Delusions to Domestic Violence and sexual abuse."<sup>17</sup>*

The diversity of the service provider workforce was another topic raised by stakeholders, with some commenting that providers should have a focus on employing a diverse range of people to better connect with their clients.

Stakeholders also emphasised that the new model needs to incentivise consultants to remain in their jobs. Many submissions highlighted the disruption caused by high turnover within service providers. Suggestions included higher wages, access to education and training, and opportunities for professional development.

*"Turnover in disability employment services is high due to unmanageable workloads, increasing administrative burdens, unachievable KPIs and unattractive salaries."<sup>18</sup>*





### ***Mixed feedback regarding the use of specialist providers***

Peak bodies and disability advocacy organisations were most likely to recommend the use of specialist providers, while some other stakeholders were in favour only for high needs cohorts including autism, intellectual disability and psychosocial disability. There was mixed feedback on whether industry-specific providers were necessary.

Stakeholders who didn't support the use of specialist providers emphasised that such arrangements may lead to further segregation, as well as limiting a person's choice of providers. Concern was also raised regarding provider capability in a potentially over-segmented market.

Some responses suggested embedding specialist staff and services within a generalist provider to ensure they could appropriately support all people with disability on their caseload.

### ***Taking a continuous improvement approach to developing the new model***

Service providers indicated that there are positive aspects to the current DES program and recommended a continuous improvement approach rather than total reform. They also commented that the bushfires and COVID-19 have not allowed time for the outcomes of 2018 reforms to be fully considered.

Disability peaks and advocacy organisations recommended extending the current program and trialling proposed changes in line with the approach to NESM.





## DISCUSSION TOPIC 9 – MEASURING SUCCESS

### *Broad range of views regarding success*

Stakeholder ideas of what success looks like varied. Overall, responses indicated that success for the new model looks like:

- **People with disability in employment of their choice, supported by person-centred services** that are tailored to their needs,
- **Genuine inclusion of people with disability within communities**, as well as a holistic approach to service provision across different supports,
- **Employers that are disability confident**, with access to a pool of talented job seekers, supported by providers to find the 'right' fit for their organisation,
- **Knowledgeable and experienced service providers** that can provide the best support for an individual, within a program that has clear guidelines and objectives, and
- **A quality Government program** that achieves results and reduces the unemployment rate for people with disability **in a cost-effective manner**.

### *Qualitative data used to assess the effectiveness of the new model*

A strong theme from submissions was the need to collect and use qualitative data to measure success, though many stakeholders acknowledged that this type of data can be difficult capture and assess. While some recommended the use of surveys, others noted that they are not always useful and require a commitment from those filling them out.

*"A better way of measuring the performance of DES providers would be to ask the clients themselves. Rather than focusing on how long it took to get into a job, or how long they kept it, it would be helpful to know whether they were treated with respect, or how well their particular needs were taken into consideration. Likewise, it would be helpful to ask employers about their experience of dealing with a particular DES provider."<sup>19</sup>*





### ***Expand types of data collected in the model's performance framework***

The most common suggestions regarding data collection (in addition to continuing to capture job placements) included:

- education and training outcomes,
- income earned/received (rather than focusing on hours worked),
- employment duration,
- meeting participant goals,
- ongoing improvement (e.g. increased hours, increased earnings, progressing in their career goals),
- health, social and wellbeing criteria, and
- employer engagement.

Stakeholders also recommended that the data should capture information about different sub-groups for better analysis of outcomes across cohorts including by disability type, age and demographics.

Some service providers suggested using National Standards for Disability Services audit results to measure success.

While service providers were supportive of better and more meaningful data collection, they note that it needs to be balanced with the administrative burden of obtaining the information.

### ***Facilitating informed choice through effective performance measures***

The majority of stakeholders suggested that the current Star Rating system is ineffective and encourages speed rather than meaningful and sustainable outcomes.

*“The weaknesses of DES are arguably attributable to the star rating performance measurement system that acts a disincentive for providers to support jobseekers with the personalised, intensive supports that lead to long-term sustainable employment for people with more complex support requirements”<sup>20</sup>*





Opinions varied as to whether Star Ratings should be removed entirely or modified to create more evenly weighted outcomes. Service providers in particular noted that the current arrangements do not recognise a lot of the work they do to support a person with disability.

In addition, many stakeholders stated that the Star Ratings mean little to people with disability or employers and that their choice of provider would be better informed by information on a provider's experience, qualifications, specialisations and previous client feedback. As much of this information as possible should be available publicly for transparency, and it should be accessible for people with disability.





## OUT-OF-SCOPE FEEDBACK

Submissions also included information on a broad range of topics related to disability or disability employment that are considered out of scope for the development of the new model but may inform the Government's broader approach to disability employment, including:

- feedback on the need for a large-scale, long-term government awareness campaign around disability employment particularly aimed at employers,
- recommendations to mandate disability employment targets or quotas for employers along with public reporting on progress towards meeting them,
- calls to increase the rates of income support payments, such as the Disability Support Pension (DSP) and the JobSeeker Payment as well as lessening the criteria for access to DSP,
- issues related to inclusive education and removing segregation within the schooling system,
- issues related to the effectiveness of the NDIS including access, information, supports, and
- suggestions for improvements to other programs such as the Employment Assistance Fund and Transition to Work.

Many of these issues are being considered through broader work to implement the recently released *Australia's Disability Strategy 2021-2031* and *Employ My Ability – the Disability Employment Strategy*.





## END NOTES

- <sup>1</sup> Submission from JFA Purple Orange to *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>2</sup> Submission from Autism Queensland to *New Disability Employment Support Model Consultation Process*, February 2022.
- <sup>3</sup> Submission from Workways to *New Disability Employment Support Model Consultation Process*, February 2022.
- <sup>4</sup> Submission from National Disability Services to *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>5</sup> Submission from WISE Employment to *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>6</sup> Submission from National Disability Services to *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>7</sup> Submission from SYC Ltd to *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>8</sup> Submission from Australian Network on Disability to *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>9</sup> Anonymous submission to the *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>10</sup> Anonymous submission to the *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>11</sup> Submission from Sean Howells to *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>12</sup> Submission from Down Syndrome Australia to *New Disability Employment Support Model Consultation Process*, December 2021.
- <sup>13</sup> Submission from Community Bridging Services Inc. to *New Disability Employment Support Model Consultation Process*, December 2021.
- <sup>14</sup> Joint submission from People with Disability Australia and the Antipoverty Centre to *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>15</sup> Submission from Physical Disability Australia to *New Disability Employment Support Model Consultation Process*, February 2022.
- <sup>16</sup> Submission from Mental Health Australia to *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>17</sup> Anonymous submission to *New Disability Employment Support Model Consultation Process*, December 2021.
- <sup>18</sup> Submission from Deaf Connect to *New Disability Employment Support Model Consultation Process*, February 2022.
- <sup>19</sup> Submission from Anglicare Australia to *New Disability Employment Support Model Consultation Process*, January 2022.
- <sup>20</sup> Joint Submission from Scope Australia Ltd and Disability Services Australia to *New Disability Employment Support Model Consultation Process*, January 2022.

