

Disability Employment Services Reform Consultation Regarding Recent Recommendations Relating to Employment Services



ASURIA
ASSURED PEOPLE SERVICES

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About Asuria



Asuria welcomes the opportunity to respond to the DES Reform consultation regarding recent recommendations relating to employment services.

For over 25 years Asuria has been delivering outsourced human services to governments. Our capability and expertise mean we continuously seek to understand government requirements and desired outcomes so we can develop services that really make a difference.

Asuria has a successful track record of delivering ‘frontline’ government human services programs across; employment and welfare, community services, education and training, allied health services, disability, youth, Indigenous and refugees needs.

Operating from more than 250 locations, Asuria is assisting on average more than 880 customers into work each month. Asuria delivers the full suite of Workforce Australia Employment Services programs, including ParentsNext, Transition to Work and Self-Employment Assistance, as well as Disability Employment Services.

Asuria prides itself on a culture that drives a sense of innovation, excitement and passion in all programs and services we deliver. At Asuria, our people are at the heart of all our services. We believe the success of services is in having every employee treat every citizen with empathy, dignity and respect. It is this Enterprising Heart approach matched with our adaptation of the latest thinking in cognitive science and behavioural economics to ensure we focus on every customer’s strengths.

ACKNOWLEDGEMENT OF COUNTRY

Asuria acknowledges the traditional owners and custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to them and their cultures, and Elders past, present and emerging.

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1.0 Eligibility



1.0 The Disability Royal Commission and public consultations on DES reform recommended removal of the minimum 8 hours work capacity requirement. If eligibility was extended to include those with an assessed work capacity with support of less than 8 hours

Q 1.1 What would quality employment look like for this cohort?

Response: Asuria supports DSS's consideration of expanding DES eligibility to include people with an assessed work capacity of less than 8 hours. We support the goal that everyone with a disability, who wants to work, should be able to access DES services, with the aim of securing quality employment.

Quality employment is defined as open employment, aligned to their life and vocational goals, interests, work capacity, skills, experience and qualifications, with appropriate remuneration. Quality employment is the same for anyone with a disability, including the flexibility to achieve work life balance, good working conditions including remuneration and employee benefits, work provides a purpose and sense of belonging, in a safe working environment and offering job security and the opportunity to have a say in what they do, how and when.

We believe DES should be the **default** service for **all** people with disability who want to work, giving them the right and ability to opt in, including people who have a NDIS plan or currently serviced in other Commonwealth Employment programs such as Workforce Australia. DES should be retained as a specialist service, able to provide a higher level of support to people with disability, using specialist staff.

We have seen eligibility for DES services restricted by changes in Government policies, resulting in more people being registered in general employment services, without access to specialist disability employment services and staff, resulting in approximately 30% of Workforce Australia participants having a disability. Many of these decisions have been driven by economic factors, not what is best for the participants.

Furthermore, we recommend the 8 hours benchmark, applied to all people in receipt of disability support pension, should be reviewed, to allow a more accurate assessment of work capacity, including where the participant wishes to work more hours and can do so.

We recognise the goal of offering employment support to anyone who wants to work, including those with a work capacity of less than 8 hours, may be more difficult to enact.

If eligibility is extended to people not able to work the minimum 8 hours DES services will need to be modified to ensure participants are supported to succeed. This includes a requirement for mutual benefit for participants and employers. Employers may need to be incentivised to increase the opportunity to create the right job, with many not able to benefit from, or offer, shorter and fewer shifts and the higher level of supervision and support which may be required.

Additionally in some instances industrial agreements, stipulating the minimum length of a shift as 4 hours, may prevent this.

Higher levels of in work supports may be required, potentially for as long as the participant or employer requires them, or they are in work.

Q 1.2 What would be the key features of a service for this cohort?

Response: To ensure DES can mutually benefit and meet the needs of both participants with a work capacity of less than 8 hours and employers it may be necessary to provide increased supports potentially for longer for both.

A person centred, tailored approach, with opportunities to upskill and increase capacity will be required, including support from trained and qualified staff and allied health professionals.

Providers need to be able to accurately assess work capacity, functionality, skills and supports required – to determine what the participant wants to do, can do and the skills and supports they and their employer require – for as long as they need.

This may include education programs for employers and their staff so they can understand how to best support their new employee including through job sharing, mental health plans and access to funds for workplace modifications and assistive technology.

Paid work observations and work trials would be very important to support these participants, including to help identify what the participant can do and what supports they need to do it. This will allow them to demonstrate to employers how they can contribute to their workplace.

Providers need to be experts at job customisation and job carving to meet participants abilities, needs and interests for roles with lesser hours.

For people with moderate intellectual disability, it will be beneficial to continue to have access to the moderate intellectual disability loading to offset additional cost. Likewise, employers may require access to the supported wage system for employees with lower productivity.

KPIs and payment regimes would also need to be reviewed, eg to include progress payments which acknowledge barriers have been addressed and improved employability.

Q 1.3 What kind of expertise would be required in providers to deliver this service?

Response: We believe the skills and expertise required to support participants with a work capacity of less than 8 hours is the same required to support all people with disability.

If the expertise and enhanced servicing requirements is recognised via a higher funding level, or a different stream (as per ESS (Employment Service Support), DMS (Disability Management Service) (Disability Management Service)), this would enable providers to resource appropriately and have a viable business, without having to rely upon small specialist providers who may not have the employer networks required to support this cohort.

Providers will need to support and build a disability confident employer database able to accommodate people with a reduced work capacity and potentially higher support needs.

Providers will require expertise in providing wrap around services and a supportive ecosystem for participants with the objective of overcoming challenges, understanding their triggers and signs to their unique challenges so they can seek the help and build independency. This is aligned to understanding that disabilities are as unique as their fingerprint and providing individual tailored support.

Sound understanding of workplace modifications, in work support capability and capacity, perhaps for a prolonged period will also be required along with a sound understanding of job customisation and ability to provide on-the-job-training.

Providers need to be able to understand the participant's life and vocational goals, interests, skills, qualifications and experience as well as any additional supports required in the workplace, work capacity and any limitations on what they can do. Providers being able to establish the parameters that make the job and work environment the right fit for the participant will be essential.

For participants with significant intellectual impairment specialist assessment and in work support may be required, from allied health professionals.

Q 1.4 What type of employment incentives or support would be beneficial?

Response: To support participants with less than 8 hours work capacity it will be necessary to provide paid work experience, observational work experience, work trials and wage subsidies, as well as in work support, workplace modifications and assistive technology, for as long as the participant requires it.

Where the participant is not able to achieve the same output level as other staff, employers may require ongoing financial support such as the supported wage system. This is the same for all people with disability who really benefit from work experience placements to assess the suitability of the jobs for them and to demonstrate what they are capable of to the employer.

Paid trials, funded by the Commonwealth, would also help reduce discrimination and break down stereotypes which contribute to much higher rates of unemployment amongst people with disability.

Insurance coverage for this is also important as many employers are reluctant to engage people in observational work experience without insurance coverage.

Job Access and funding for workplace modifications, assistive technology and training for employers are also important.

The inclusion of progress payments, as in Workforce Australia, would provide an incentive to providers where long lead times are anticipated for participants most distant from the market, with multiple and complex barriers. This will support providers to invest in interventions that progressively improve participant employability.

Q 1.5 Is there the potential for unintended consequence that should be considered?

Response: Unintended consequences can include some award requirements which stipulate minimum shift duration for casual employees. Awards may stipulate a minimum of 2 – 4 hours per shift. The employee must be paid this minimum even if they work fewer hours.

With the change to include participants with a benchmark of less than 8 hours to encourage more participants to engage in the open labour market, it is important to remember some participants may benefit more from the service offerings within an ADE, including providing social structure as well as capacity building.

Larger consequences however could be in continuing to assess people's eligibility through capacity and benchmarking or whether people are accessing a government payment, either through Services Australia or NDIS.

The DES program should be available to all people who have a disability and wish to engage in employment, more in line with the social model than the current medical model.

Also, there is concern the current benchmarking process is subject to inconsistent assessments which could see people misrepresented and unfairly deemed 'unable to work 8 hours' which may have a negative impact on the individual and set low expectations with employers or providers in building capacity.

2.0 The Disability Royal Commission considers all people with disability should have the opportunity to work in open employment. If the 2 years limit on DES participation is removed and/or if the requirement to be in receipt of income support payment is removed:

Q2.1 What benefits would these arrangements bring to participant services and reduced administration?

Response: We support both suggested changes of removing the 2 years limit and the requirement for participants to be in receipt of an income support payment in line with the Disability Royal Commission recommendations. We agree anyone with disability should have the opportunity to work in open employment. We recognise some people are very distant from the labour market and may take more than two years to secure and sustain ongoing employment.

Given the fact that most participants currently elect to continue in DES and with the same provider we believe removing the two years limit will reduce the backlog in the assessment process as there will no longer be a need for another assessment.

This offers the opportunity to set longer term, and more holistic goals. The speed to placement KPIs should be removed to allow for an individual to progress over a longer period rather than being rushed into an imperfect placement, or the first job.

We propose the participant undertakes a program review at 104 weeks in place of the 78 weeks review, to assess the participants capacity to benefit from the support of the DES program, interest in moving to a new provider and consideration for a move to alternate income support.

For example, the Senate Inquiry into WFA (Workforce Australia) recommended a streamlined transition to reinstated sickness benefits for people who have a long-term illness or health condition which prevents them from working. This would allow removal of mutual obligation requirements whilst they focus on their health and wellbeing.

We also note a very high suspended caseload in DES (25%) where people which these measures may address by removing participants from DES who have long term suspensions or by offering an alternate service whilst they are unable to engage.

We support the principle that assessments need to continue to allow ALL stakeholders the opportunity to change their path.

From a service delivery and customer experience perspective the removal of the two years limit may also encourage better community connections and collaborative servicing of participants to support them into employment. It allows more time to address barriers to employment without the pressures of mutual obligations and having to find a job quickly.

Q 2.2 Are there any unintended consequences, for whom and which is this important?

Response: We do not see any unintended consequences as participants can be reassessed at any time if their circumstances change, they can elect to change providers', and in some cases, to opt out of DES at any time. There is no benefit to the participant in existing and rejoining the DES service.

3.0 Service Structure

The recent reviews included recommendations with themes of program simplification and less administration, while retaining customised, or specific services. If the DEM and ESS services were combined into a single service with funding levels cater to differences in service and support needs:

Q 3.1 Would this simplify the program design and reduce administration?

Response: Yes, it would. We strongly support a single, combined DES service. This will require clearly defined funding levels and servicing guidelines. It will streamline processes and reduce confusion amongst participants and simplify performance management.

This will also address inconsistencies in ongoing support services – which everyone needs.

Q 3.2 Would this have any unintended consequences, for whom and why is that important?

Response: To avoid unintended consequences where participants or employers received a reduced level of services clear funding and servicing guidelines will be required.

4.0 The recent reviews have recommended that employment services be more flexible and tailored, with support differentiated according to individual need and circumstances. If, in addition to the current full-service offer, a more flexible service option was proposed for some participants:

Q 4.1 Which participants might be suitable for this type of service offer?

Volunteers with or without temporary exemptions?

Participants with circumstances limiting their capacity?

Participants engaged in partial work, non-vocational activities or education who want to remain connected?

Response: We support the idea of a more flexible service option for participants who need it, including primary care givers, participants with limited work capacity, who are underemployed, live remotely or are self-employed.

Q 4.2 What benefits would this bring to participant services and reduced administration?

Response: Benefits may include reduced administration in terms of frequency and time spent providing attempted support. This may increase meaningful engagement from participants, as it would be a service that meets their needs and capabilities, rather than the current framework that creates additional pressures for those who may be undertaking part time arrangements that prohibit full engagement.

The new Points Based Activation System in Workforce Australia is an alternative approach which may offer greater flexibility and tailoring to individual participants.

We also agree with the Senate Inquiry into Workforce Australia which recommended separation between the "policing" and "servicing" of participants. This recognised the conflict between being a mentor and coach and applying sanctions with financial ramifications.

Q 4.3 Are there any unintended consequences, for whom and why is this important?

Response: There would need to be a framework and reassessment period around the assessment of capability to engage as potential people with partial or flexible arrangements to not receive the support they require.

5.0 Mutual Obligations

The Select Committee on Workforce Australia called for greater flexibility and tailoring of mutual obligations, with a focus on participating meaningfully in services. If it was possible to simplify requirements so participants meet their obligations by engaging effectively with a provider in preparing for, seeking and undertaking employment:

Q 5.1 What benefits would this bring to participants and administration?

Response: We would support this approach with regards to building engagement first and foremost, before focusing on enforcement of mutual obligations outlined in a job plan as a secondary measure.

This would encourage positive engagement from both the provider and participant which will lead to more successful outcomes than current arrangements, where some participants only engage because they are required to. This currently gives some providers no reason to offer quality support as people are forced to engage.

The introduction of progress payments which recognise, and reward progress made by participants and providers, as in Workforce Australia, would further support this approach.

Q 5.2 Are there any unintended consequences, for whom and why is this important?

Response: There is risk of user error evoking a negative response in moving between engagement and compulsory settings. It may not change behaviours for those who are in receipt of JSP and barely engaging for long periods.

Q 5.3 Would the option to move to specific requirements – similar to current arrangements – be appropriate where a participant wasn't engaging effectively?

Response: We believe this is the correct approach to manage Mutual Obligations as it supports continuous engagement.

6.0 Ingoing Support

The Disability Royal Commission recommended that arrangements facilitate flexible employment supports and support progress to long-term employment outcomes. If Work Assist focussed on immediate access to support service fees and with less emphasis on outcome payments:

Q 6.1 What benefits would this bring to participant service and reduced administration?

Response: More participants and employers will be able to get the supports they need to sustain ongoing employment.

Q 6.2 Are there any unintended consequences, for whom and why is it important?

Response: No.

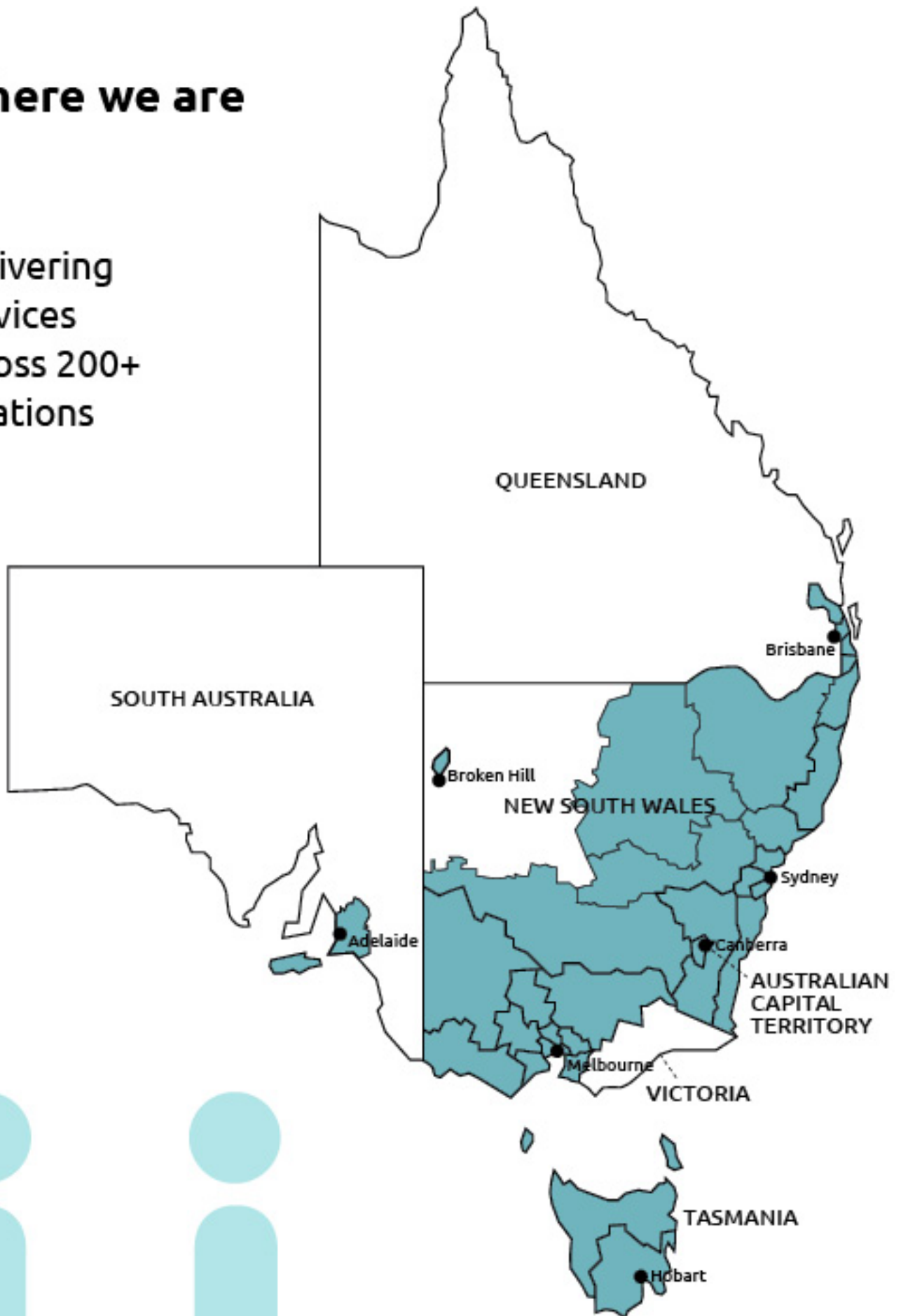
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