



Develop Connect Grow

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The Department of Social Services  
Lodged via Email: DESReforms@dss.gov.au

To the Department

My Pathway is a social and economic development organisation delivering services from the Top End and Torres Strait to Tasmania. We have been developing people, connecting them to opportunities and helping communities to grow since 2007. We are committed to supporting people with a disability into meaningful employment and helping employers to create more inclusive workplaces.

My Pathway delivers a range of employment, social and economic development programs, including Disability Employment Services (DES), ParentsNext, Self-Employment Assistance and the Community Development Program. We offer apprenticeships, training through our Registered Training Organisation and facilitate community projects to build local skills and deliver important cultural and community infrastructure.

Since commencing the DES contract in 2018, My Pathway has supported the take up of more than 750 jobs that interest our participants and appeal to their needs, skills and abilities.

We welcome the opportunity to be involved in the program reform, but we urge future consultations to allow greater time for providers to supply responses that will assist to grow the program to best develop the skills and capacity of diverse participants with valuable contributions to make to the workforce.

Please find our responses to the questions raised in the current reform consultation on the following pages. Please let us know if there is any further clarification or insight we can provide to assist.

Regards,

A handwritten signature in purple ink that reads 'Anthony Steel'.

Associate Director – Employment Services



Enterprise Management Group Pty Ltd (ABN 54 123 371 022) trading as My Pathway  
My Pathway acknowledges First Nation peoples of Australia and pays respect to the Traditional Owner elders, tribes and communities on whose land and seas we do business. Always was, always will be.

## Eligibility

*The Disability Royal Commission and public consultation on DES reform recommended removal of the minimum 8-hour work capacity requirement.*

We support the idea that all people with a disability should have access to Disability Employment Services. The removal of the minimum 8-hour capacity requirement would be a significant step in allowing the program to welcome a new, previously excluded, cohort. People with an assessed work capacity of less than 8 hours a week are likely to be among the most isolated in Australian society, and those with the greatest need to develop their capacity and connections.

While further consultation is required to measure the actual levels, our assumption is, there are innumerable small businesses and community organisations across the nation that could make use of a capable and diverse workforce for less than 8 hours a week. These roles could be life-changing for a person who has been isolated and overlooked, helping them to forge connections and build skills. Lower hour requirements may also allow participants to 'share' roles with suitable employers, helping the program to have greater impact for more participants, especially those in extremely vulnerable cohorts.

How providers would be supported to deliver services to newly eligible participants that have more complex barriers to employment and engagement must be considered. For example, the support needs of a participant with an intellectual disability to prepare for, find and maintain employment may be far more resource-intensive than providers are currently equipped to deliver. Servicing would also require greater collaboration between support networks, such as between DES and NDIS services.

*The Disability Royal Commission considers that all people with disability should have the opportunity to work in open employment.*

The removal of both the 2-year limit and the requirement for participants to be in receipt of an income support payment would create better access to support and opportunity for participants and remove administrative burdens on providers and employers.

Under the current system, participants exit the program after two years, if they are still building their capacity. Without the supports of the DES program, many exited participants end up back in the program within a short time. This process is time-consuming and often traumatic for participants, creating a painful cycle that many participants experience several times in their engagement with the program. A program that could continue to provide continuous supports to vulnerable jobseekers while they developed the skills and experience needed to live independent lives would be far more beneficial.



Removing these constraints would also lessen the administration burden on providers, allowing consultants more time to focus on developing the skills and capacity of their participants and supporting them into meaningful employment. Employers are also likely to be more accepting of participants if they know that supports will not have a finite end if they are to take on a promising participant.

## Service Structure

*The recent reviews included recommendations with themes of program simplification and less administration, while retaining customised, cohort specific services.*

Any efforts to simplify the program for both providers and participants should be commended and encouraged. A combined DMS and ESS service, including a program in ESS Web interface, would greatly reduce administration complexity for providers. The required technology changes to achieve this must be completed early enough for providers to familiarise themselves with the new system ahead of the new contract to ensure seamless services for participants.

In such a combined model providers must have access to funding in line with supports required for each specific cohort.

Currently, numerous providers only service DMS or ESS in a region. In combining both services, it would be most beneficial to take a growth approach, whereby this change would result in more providers with increased capacity, rather than leading to fewer providers. Alongside the greater capacity needed to provide exemplary service to widened eligibility criteria, this would allow for participant choice of providers and result in providers striving for excellence.

*The recent reviews have recommended that employment services be more flexible and tailored, with support differentiated according to individual need and circumstances.*

There is a real opportunity here for authentic inclusion that moves away from the current medical model of assessment. If ALL people with a disability had access to the DES program, providers could work with participants to determine the level of support and specialisations required. This would allow a tailored approach which is person-centred and exercises choice rather than dictating available support based on someone's medical capacity to work.

## Ongoing support

*The Disability Royal Commission recommended that arrangements facilitate flexible employment supports, and support progress to long-term employment outcomes.*

There is a need for greater flexibility around achieving employment outcomes. The current model is too restrictive when the needs of someone with a disability does not always fit into the DSS employment outcome model. Less restrictive parameters for employment outcomes would enable provider flexibility in the support that can be provided to achieve meaningful engagement in the labour market.

Advocacy and dignity of risk is often removed from the equation due to the contractual and compliance requirements of the contract.

Supports are determined by the ability to achieve a financial outcome, the more diverse and accessible outcome payments become, the more diverse and accessible the service will be.