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Establishing a Disability Employment Centre of Excellence.

Options Paper Response

CVGT Employment

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About CVGT Employment

CVGT Employment (CVGT) has been providing employment services for 40 years. Our staff have extensive employment services experience, ensuring job seekers and participants are job ready and matched to employers who are committed to supporting them achieve their employment goals.

In 1983, the councils surrounding Bendigo responded to a survey on youth unemployment skill shortages in the area. There was a need to have young people actively employed, while learning the skills needed to become tradesmen in their chosen fields. Employment services provider Central Victoria Group Apprenticeship Scheme was born (now CVGT Australia trading as CVGT Employment).

In the beginning, we employed one manager who rode a bicycle to monitor the progress of his 15 apprentices. The business has grown from strength to strength and as an employment services provider, now employs over 400 people in a diverse range of employment programs and specialties across Victoria, New South Wales, and Tasmania.

Delivering positive economic and social benefits to the community is at the heart of what CVGT does. In addition to providing quality employment services, we have a real commitment to supporting the communities where we operate. We do this through community grants, sponsorships, and scholarships.

CVGT have provided employment services from the inception of Job Network in 1998 and since that time, CVGT has delivered a range of employment and employment related services including, but not limited to:

- Job Placement
- Job Services Australia
- jobactive
- Workforce Australia
- Disability Employment Network
- Disability Employment Services – Disability Management Services and Employment Support Services
- Harvest Labour Services
- Community Work Coordinator
- Work for the Dole and Droughtforce
- Youth Connections
- Youth Pathways



- Community Development Employment Projects
- Structured Training and Employment Projects
- Structured Training and Employment Projects Employment Related Services
- Indigenous Youth Employment Contract
- Indigenous Employment Program
- Australian Apprenticeship Support Services
- Australian Apprenticeship Services Network
- Greencorps
- National Green Jobs Corps
- ParentsNext
- Transition to Work, and
- Numerous state-based employment programs.

In addition, CVGT has been delivering Group Training services for 40 years, supporting apprentices, trainees, and employers.

CVGT Employment's Disability Employment Centre of Excellence Response

In preparation for this submission, CVGT took a pragmatic approach and requested key operational and corporate employees to review the Establishing a Disability Employment Centre of Excellence Options Paper and offer feedback.

Preamble

CVGT Employment welcome the opportunity to respond to this important aspect of Disability Employment reform. We are encouraged by the seriousness this reform is being contextualised and fully support the development of all approaches aimed at making Disability Employment Services more efficient, effective, and quality driven. Above all, we are excited to see what will be put in place to ensure Disability Employment Services is fit for purpose and will meet the needs of all People with Disability.

We start our response with the acknowledgement that the Options Paper has been prepared based on the presumption that the current Employment Service Deeds, subsequent guidelines and supporting material are the ultimate tools of Employment Services delivery. Further it is our assumption that a true Centre of Excellence (Centre) will support the ongoing assessment, modification, and flexibility of any future or proposed Disability Employment Service. To this end the contracting framework for all employment services will require significant structural changes to accommodate the concept of service modifications and deliverables, through the adoption and delivery of best practice concepts. How will contracting arrangements accommodate evidence-based practices, as by definition, these practices will require continual variations to those contracts to deliver this ideation?

We also premise our response with the overall opinion, that the Options Paper speaks intensely to the concept of delivering an employment service based on excellence – it is, however, flavoured with a fair degree of compliance. Again, there is an overall presumption that if delivery of a deed is compliant, we are therefore delivering a quality service. We are not confident that a contract compliant service



automatically equates to service excellence. This brings us to the point above, is the quality of the founding documents and contracting frameworks sufficient to meet the needs of participants and employers? Particularly when we consider labour market dynamics, caseload characteristics and place-based solutions that will, and do, ultimately vary from region to region.

As outlined, we support the deliberate attempt to address service delivery excellence for Disability Employment Services, although we are rather confused as to why increasing the capacity of service providers is a first priority, when there are so many existing opportunities to address the constraints of current programs, that will lead to an overall higher quality service.

Notwithstanding the above, the sector would be pleased to see some reciprocity in service excellence from government. Recent experiences regarding star ratings and the lack of trust in the government as a result, by Participants, community and the sector may suggest there is work to be done.

Questions

1.1 Why do we need a Centre?

Do we need a Centre? would be our first question, rather than why. The paper articulates reasons such as increasing employment outcomes and increasing the capacity of providers. Both admirable tenets, and yet particular current policy settings work against these, to varying degrees. For example:

- Young school leavers with disability unable to secure disability employment supports, post-secondary education, unless they are receiving a welfare payment: eligibility changes have forced some young people to make application for welfare just to receive employment supports. Why do we need to force people onto welfare just to get a support?
- Inability to utilise true and proper work experience opportunities to expose people to real work like experiences: the removal of Unpaid Work Experience has been extraordinarily detrimental to employment service provision. Hands on experience is crucial for career choice and career development; observational work experience is completely insufficient.
- An assessment system that allocates a participant, who is a quadruple amputee, as a Funding Level 2 participant. Is this a result of poor assessment methodology, or is it a result of the participant directly registering with a service provider, and therefore not representing a potential saving in welfare payments?

We proffer that these examples, among others, negate the central intent of the relevant outcome area (Employment and financial security) of the Australian Disability Strategy 2021-2031 immensely. Do we need a Centre to rectify these?

Employment Service Providers deliver against a particular Deed and while the overall intent of that instrument is based on a work first model, there will always be unscrupulous behaviours in the delivery by a small portion of the sector. For example, we know there are providers who undertake the Ongoing Support function in a purely centralised model where ongoing support contacts are all maintained by phone connection, from one central location. This is deemed to be a quality service because they can demonstrate through the government system that they have met the Deed requirements; it shows up on a spreadsheet, so it must be happening. Whereas other providers provide Ongoing Support and Post Placement Support in person, on the shop floor in the workplace, based on the individual needs of each Participant and employer. Yet managing the rigid system requirements of updating job plans and attending appointments is difficult and cumbersome and inordinately time consuming, and they are



considered a poor service because a report is not demonstrating a quality service. However, they are supporting people into ongoing and sustainable employment and achieving outcomes for people with disability. Do we need a Centre to rectify this?

If a Centre for Excellence is to enable rectification of these types of issues, which may be expressed as unintended consequences of other policy levers being enacted, we would encourage further investigation and development of such a centre. We add though, that a Centre, to be workable and effective, would need to manage and simplify all levels of bureaucracy to be efficient and proactive.

1.2 What should be the core functions of the Centre?

Regardless of the format of an intended Centre of Excellence, we believe there needs to be some central areas of responsibility and function, including, in no particular order of criticality:

- To develop an association between academia and the sector to develop robust models for research and best-practice development and delivery.
- To enable research and development and dissemination of results in pragmatic and deliverable formats.
- To inform high quality training materials for easy adoption across the sector.
- To enable recommendations for program design, variation, and adoption.
- To bring the voice of service beneficiaries (participants and employers) to the front of program design.
- To celebrate and promote and endorse innovative service delivery from within the sector.
- To maintain a platform for program design exploration and innovation.
- A central repository for program and industry data.
- To act as an independent review panel for government policy, with test and learn and recourse powers.

We are interested in the element noted as “Promote evidence-based practice in employment for people with an intellectual disability”, and question why this disability type is singled out. Is there not capacity to develop evidence-based practice for numerous other disability types?

We would expect the Centre to be well versed in data management and data interrogation and analysis of that interrogation for the purposes of designing best practice approaches. Disability Employment data is well established and well collated and extremely thorough in its content. It would be extremely prudent for the Centre to act as the custodian of this data and be given the resources to utilise its power efficiently and effectively.

We are concerned that there is consideration included in the paper relating to quality control, in the context it has been presented. It does seem to be indicating another layer of compliance for providers, when there is already an inordinate level of compliance activity for providers. Very quickly, the paper goes from discussing a Centre of Excellence to an “Agency” that could monitor provider compliance obligations. If the intent here is to act as an advocate to better inform the compliance activities for providers, and to make recommendations on how to streamline this, there would be interest across the sector. If, however, the intent of this agency is to look at ways to strengthen or convolute compliance for providers, we are confident that this would not sit well.

Additionally, if the outputs of the Centre are to drive workplace diversity, as the Workplace Gender Equality Agency promotes and improves gender equality, and work with employers to begin removing



barriers to employing people with disability and eliminate discrimination in the workplace and improve productivity, we believe there would be sector interest.

Collaborative competition is an interesting terminology and almost appears to be an oxymoron, in this context. What about just “Enhancing Collaboration”? It is an indistinguishable fact, that as long as providers are measured against each other, true collaboration is almost a “holy grail”. Particularly when there is a mix of not-for-profits and for-profit providers operating in the same eco-system. As a DES provider we have had great success collaborating with other disability services and have excelled in creating combined outcomes for people with disability; it works exceedingly well. As soon as we attempt to bring another DES provider into the discussion, we are faced with stone-walls, at best or, attempts to steal our commercial knowledge, at worst.

2.1 Who can the Centre assist? Are any groups missing?

We support the groups listed within the paper. However, we do believe there needs to be the inclusion of disability support services, as a general group. Particularly those disability support services that assist people with disability to consider open employment and undertake a range of employment related activities to enable them to make informed decisions about that employment.

The “Centre” could also support and assist education providers in both the secondary and tertiary settings. Particularly Special Developmental Schools that support school children with employment preparation and work experience and registered training organisations, such as TAFE that deliver Work Education training. These education providers are an integral element of the disability employment eco-system and offer outstanding opportunities for collaboration with disability employment providers.

2.2 How can the Centre work with stakeholders to increase the employment rate for people with disability?

If a central objective for the Centre is to increase employment opportunities for people with disability, we believe there is capacity to develop it starting with an employer focus. It is employers who hold the opportunities for this objective to be realised and it is employers who will benefit alongside those people with disability.

To develop a Centre that provides advice, support and training to businesses, who require this type of support to become more inclusive will generate the sufficient demand for the remainder of the stakeholders to fulfil the supply requirements.

Focussing on employer needs and education will enable a much more streamlined approach and understanding of need. From this need, the Centre can then work on collaboration with the other stakeholders listed to develop the best practice required to meet that need. Providing employers with the tools, avenues and skills will increase their confidence to employ people with disability.

An employer lens to the Centre will determine the levels and types of collaboration required. People with disability and their families will have clarity around employer demand and skills required that will allow informed choices for career development. This will enforce training organisations and educators to develop appropriate skills development programs. Critical to the development of training for skill attainment by training providers is the absolute need for training delivery to be modified to the needs and levels of some people with disability. Employment service providers can then coordinate pathways with stakeholders with the knowledge that there is awareness and importantly, demand and interest from employers.



2.3 What can the Centre do to increase the capability and capacity of employment service providers?

Solutions brokered by the Centre, based on an employer demand scenario, will offer providers additional clarity around individual needs of employer sectors and career and skill development for people with disability.

Coupled with the Centre's approach to developing research based best practice, the delivery models that can be translated to providers will be factual and demand driven.

Based on an employer demand vision for the Centre, employers would be better informed and better positioned to articulate their needs to employment providers. Employers would have a better understanding of what to expect and what is available in terms of support to both them and those they are hiring. This would generate a more professional approach required of providers as they would be competing for business with a more informed customer base. Providers would have little choice but to ensure that they are competitive, have a professionalised workforce, and providing the support expected and understood by employers.

The Centre could be a valuable resource to the sector by acting as an overseer of training standards and industry minimum requirements. This could be extended to being the body to ensure adequate resourcing is provided to professional development and to act as an industry advocate promoting and coordinating a Continuing Professional Development (CDP) framework. A CDP that supports recognition of sector employees' everyday work, acknowledges and tracks employees' additional skill development through an individualised professional development plan that provides industry-wide acknowledgement of achieved levels of professional development. There are numerous CDP examples that could be reviewed as models for consideration such as Royals Australian College of General Practitioners (RACGP), and Australian Institute of Company Directors (AICD).

3.1 What are your views on the models presented?

We see elements of all models presented in the Paper having individual and combined benefit.

There is certainly a need for better research, evaluation, dissemination and implementation of relevant information and practices that would ultimately benefit all stakeholders. This would lend itself to accommodating a clearinghouse approach to the dissemination of information and dependant on the research and its output, there is capacity to develop an evidence-based training hub.

A statutory agency approach is viewed as having some merit. However, a careful balance between it being a source of good practice and it being seen as a compliance mechanism would need to be negotiated. We see a huge benefit if commitment was made to generating a framework that supports a demand driven approach to enable employers to be better equipped, informed and willing to initiate employment of people with disability. The difference to be aimed for is an agency that provides employers with the desire to participate as opposed to employers having to participate.

3.2 Are there any models for a Centre to consider that are not included in this paper?

We are particularly impressed with the model of the Centre of Excellence being created in Scotland. A Public Social Partnership between the Scottish Government and a range of expert organisations. All with a clear objective to fundamentally change how employment is thought of in Scotland.



Known as APT, it is a combination of the models contained within the Paper, with a clear and unambiguous focus of developing the capacity of employers.

As indicated above, we believe once employers are fully informed and have access to the appropriate levels of knowledge, they will demand the best levels of support from providers. It will be entirely up to providers to deliver services, as demanded by employers, at the risk of low levels of engagement with employers that would ultimately lead to loss of business.

3.3 What can the Government take from existing models of Centre of Excellence? What should be ruled out?

Having a Centre of Excellence is all well and good - but if some stakeholders don't interact with it, does it risk becoming redundant? Worse - if stakeholders feel they are being superseded, excluded or ignored by the Centre, they may actively avoid sharing information and create silos that harm the initial intention.

It is incumbent upon whatever structure or whatever governance sits above the Centre, it is created based on inclusivity, transparency and trust. It must be open to all and provide accessibility to everyone, regardless of their purpose. There must be an open-door policy and it must be unwavering in its purpose. Things to rule out would include:

- Poorly defined mission for the Centre
- Becoming detached from the main game and becoming superior and inaccessible
- Poor communication with all stakeholders
- Poor governance structure
- Failing to articulate measures and impacts.
- Poor connection with decision makers at the government level.

4.1 Where could a Centre be best placed (for example, within a government agency, a university, or as a stand-alone institution)?

Our view at this stage is to place the Centre as a stand-alone institution/entity. We believe this would provide sufficient independence from any undue stakeholder influence.

A stand-alone Centre would have the capacity to align with other research stakeholders based on need and research scope. There is already a range of university aligned disability research entities including the Melbourne University Disability Institute, RMIT's Workforce Innovation & Development Institute, and Monash have the Centre for Health Economics. One might ask why these world class institutes aren't already generating insights into disability employment excellence.

A stand-alone Centre would also provide some protection from competing priorities from within other entities such as universities. For example, the Analysis and Policy Observatory (APO) the clearinghouse for public policy research and resources, housed in Swinburne University and acting as the clearinghouse for the Melbourne Disability Institute, are about to close their doors, due to Swinburne's funding constraints.

Under no circumstances would we support the Centre being placed within a government agency. We cannot see that this approach would be able to demonstrate complete transparency.



4.2 Are there any other implementation issues that should be considered?

Regardless of where the Centre is situated, two major issues to manage during implementation are:

1. Appropriate resourcing – see the point above in relation to the Analysis and Policy Observatory (APO). Long term funding and continual support are critical.
2. Accessibility – the Centre must be completely accessible by all stakeholders and not to be seen as an exclusive enclave for academics. It must be seen as producing and developing clear and articulate benefit for all stakeholders.

4.3 What elements of the proposed role of the Centre or its functions should be prioritised?

We are concerned that one of the key roles of the Centre is to help government to work with providers to lift the quality of employment services and deliver better outcomes ensuring the experiences and views of people with disability are central to how quality is measured. We see a risk of this becoming an additional punitive compliance mechanism that could generate unnecessary administration burden, further removing valuable time from the limited availability providers already have with participants.

As we have articulated earlier, we believe the Centre's key priority is to become an employer focussed entity. One that is determined to engage with employers and to improve their capacity to employ people with disability. The coordination of the views of people with disability, their families, and their carers, with that of the recruitment challenges of employers, we believe the Centre has the potential for generating a quantum shift in employment outcomes for people with disability.