

28 October 2020

New Employment Services Division
C14MT4
Department of Education, Skills and Employment
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CANBERRA ACT 2601



**Brotherhood
of St Laurence**

Working for an Australia free of poverty

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To Whom it May Concern,

Proposed licensing system for the New Employment Services Model

The [Brotherhood of St Laurence](#) is a non-government, community-based organisation concerned with social justice. Based in Melbourne, but with programs and services throughout Australia, the BSL is working for a better deal for disadvantaged people. It undertakes research, service development and delivery and advocacy, with the objective of addressing unmet needs and translating learning into new policies, programs and practices for implementation by government and others.

Our submission is based on our extensive experience in providing employment programs, for long-term jobseekers experiencing disadvantage – these include federal government funded programs such as Transition to Work (TTW), Youth Transition Support Program (YTSP), ParentsNext, and Victorian Government-funded programs such as Work and Learning Centres, Jobs Victorian Employment Network and our social enterprise, Given the Chance, which provides labour hire services. Our response focuses on the following questions from Chapters 3, 6, 7 and 9:

Chapter 3

3.1. In relation to the question: Should generalist and specialist organisations be included on the same panel?

We query whether “generalist” and “specialist” categories are still valid given each cohort has their digital versus enhanced service providers. We believe that having separate categories problematises the “specialist” cohort rather than integrates them into mainstream services. These generalist services should be equipped to service all cohorts leaving specialist providers for those not being supported by other services.

We view that the panel mix should not be based on a mix of “generalist” and “specialist” providers but rather the specific cohorts in a local area. For example, certain specialist cohorts are already being supported through other services – eg. young people through Transition to Work (TTW) and parents through ParentsNext and programs providing services to cohorts which cross-over. Examples of this include: TTW providing services to young people of CALD or Indigenous backgrounds and/or those with disabilities.

We are concerned that the proposed licensing model favours larger providers who may not have strong connections to local communities. The panel mix should be based on the organisation’s size not their offering capacity. Furthermore, we believe that the proposed model poses the following risks:

- That the proposed workforce specialist category could result in these providers monopolising job opportunities in a local area

- It encourages a greater number of providers rather than a few quality providers, particularly those driven by profit, rather than those with extended presence, relationships and networks providing their service with a holistic range of other place-based supports, which jobseekers experiencing disadvantage require
- It fosters competition rather than collaboration
- Through our services and as documented in our report, [Missing the mark: Employer perspectives on employment services and mature age jobseekers in Australia \(2018\)](#), employers regularly provide feedback that they get frustrated by being approached by too many providers – they are more focused on job-ready starters and less concerned about which provider their Employer Broker is attached to.

We are also unclear how the proposal reduces administration. Unless the Targeted Compliance Framework (TCF) ceased, there will still be administratively demanding elements within the system. As will the need to remain ready to step up in a particular area. This will be difficult for smaller community-based organisations and lead to an unequal playing field.

Chapter 6

We have focused on answering the following guiding questions

- **Should cohort specialists only be referred job seekers from their target cohort?**
- **Which cohort types should have specialists?**
- **How should the new model interact with complementary programs (e.g. Transition to Work, Work for the Dole)?**
- **How should workforce specialists operate?**

Cohort specialists should exist only for those not being serviced by other providers. Where there are no existing Commonwealth services in place eg. TTW or ParentsNext, then these cohort types should be provided for, as well as any other cohorts within high unemployment categories within ABS data.

Regarding interaction with complementary programs, facilitated referrals need to be embedded into KPIs. More broadly, local areas need responsive employment services that understand and are embedded in local communities - and that means being able to support the particular characteristics of the region, whether it's large numbers of young people, people of refugee backgrounds and/or mature age jobseekers.

Chapter 7

With regard to the question: **Should a portion of market share remain unallocated?**, our view is that 5-10% should remain unallocated to allow for new providers to come into the area.

Chapter 9

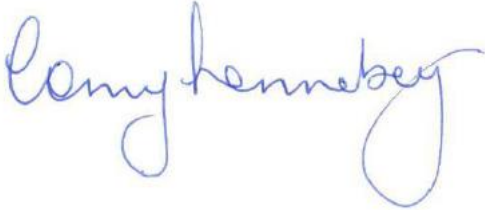
We have focused on answering the following guiding questions

- **What measures could be included in the Provider Performance Framework?**
- **What features in the Provider Performance Framework would support the classification of high, medium and low performance?**

We believe that the Provider Performance Framework must provide an incentive to pick up participants requiring an "Enhanced Service". Furthermore, features that would support the classification of high, medium and low performance, should include short and long-term sustainability outcomes, community networks, jobseeker satisfaction, job-readiness indicators and employer satisfaction.

Thank you for the opportunity to input. Should you require input, please contact Ms Hutch Hussein, Senior Manager, Government Engagement, via hutchhussein@bsl.org.au .

Yours sincerely,

A handwritten signature in blue ink that reads "Conny Lenneberg". The signature is written in a cursive style with a large, looping 'y' and 'g'.

CONNIE LENNEBERG
Executive Director