


JOBLIFE RESPONSE TO THE PROPOSED LICENSING SYSTEM FOR THE NEW EMPLOYMENT SERVICES MODEL DISCUSSION PAPER

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About JobLife

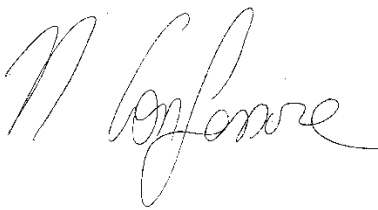
JobLife is an experienced employment services provider delivering Disability Employment Services across Queensland, New South Wales, Tasmania, Victoria, Western Australia and South Australia. With a focus on supporting people with disability to find and keep work, our vision is “a job for everybody’.

JobLife is a unique joint venture between Australia’s pre-eminent not-for-profit social purpose organisation, Life Without Barriers, and leading employment services company, the Angus Knight Group.

We currently work with over 3000 job seekers across our footprint and have successfully supported people into education and to find employment.

In considering the Department’s discussion paper, JobLife have included responses to those questions which we believe we can make a positive contribution, based on our experience as an employment service provider and disability specialist.

As the New Employment Services model continues to develop JobLife would welcome the opportunity to remain engaged with the Department as the model is refined. I would also be happy to discuss any of our feedback should you require.



Nunzia Confessore

Chief Executive Officer

JobLife Employment

Response to Discussion Questions

Chapter 2 – Establishing a Panel

Should generalist and specialist organisations be included on the same panel?

Generalists and specialist providers could be included on the same national panel. This will streamline access information on available employment service providers. In doing so, arrangements will need to be put in place to manage referrals, market share, allocation of licences.

We also support that an organisation could be both a generalist and a specialist in the same Employment Region.

How long should the panel be in place for?

JobLife support a panel duration of 6 years. This duration will provide sufficient time for organisations to establish and to commence delivering quality services. A panel duration of this length, if combined with reasonable licence lengths will more readily encourage and enable investment by service providers into areas of innovation in their service delivery.

In what circumstances should a panel refresh occur?

JobLife considers that there would only be very limited occasions in which the panel would need to be refreshed. This would only occur in circumstances where it could be identified that current panellists would not be sufficient to meet the need in an area, where there would not be sufficient expertise to meet the labour market requirements, or where job seeker choice was detrimentally constrained.

Examples of where this might occur include for example:

- Significant labour market shocks requiring additional coverage or expertise (e.g. industry downturn, pandemic); or
- Significant reduction in the number of providers (e.g. due to Provider performance, or acquisition etc).

How long should licences be issued for initially?

Licences should be offered for a minimum period of 3 years.

Chapter 3 – Issuing Contractual Licences

Should an organisation be allowed to service areas smaller than an Employment Region?

Organisations should be allowed to service smaller regions where there is a demonstrated need for this support. This could relate to areas where specific cohorts for example, disability or youth are present in a specific area within a region.

In considering smaller service areas however, consideration will need to be given to issues of market share, viability of service providers and impacts on provider performance.

Should the number of licences be capped in each Employment Region?

Licences should be capped in each employment region. While in theory an uncapped market could drive more competition, employment services do not operate within a strictly commercial environment. Opportunities to enter and exit the market are constrained by the licencing arrangement, and requirements for delivery are set by the Government which can constrain the ability of service providers to modify service arrangements. In this environment therefore, an uncapped model is not feasible.

A capped number of licences which provide sufficient market share should be considered as it will provide the necessary stability in the market for job seekers, employers and providers.

When should new licences be added to a region?

New licences should be added to a region where it is clear there are issues of either coverage or quality of service for job seekers.

In what circumstances should short-term licences be issued?

JobLife consider that there would only be limited circumstances where short-term licences would be required. Short term licences should only be issued in circumstances where there is a specific need in a region, and it can be demonstrated that no current licence holders can address the local requirements.

Chapter 4 – Licence Reviews

How many performance groupings should there be?

The proposed three performance groupings are sound and provide sufficient scope for services to operate within. Within this, JobLife have assumed that organisations will not be rated on a bell curve model (i.e. All providers in the region will be capable of achieving a high score).

How frequently should Licence Reviews occur?

Reviewing the performance of service providers should be a critical component of the new employment service. JobLife note the intention for these to be conducted annually. As an experienced provider of Australian Government employment services, we would note that supporting and participating in the performance process can create considerable burden of work for both the Department and services. The proposal for annual reviews could have the unintended consequence impacting negatively on performance.

We note in comparable programs (e.g. jobactive and Disability Employment Services) an 18-month review/business re-allocation process is undertaken. JobLife believes this timeline could better achieve the outcome of managing performance in the market and limiting any unintended consequences.

How often should providers receive performance data?

Performance data should be made available to service providers as regularly as possible.

Should provider performance be publicly accessible?

Provider performance should be made publicly accessible to help drive provider performance, and importantly inform job seeker choice.

When should the first Licence Review occur?

To allow providers to establish operations and adapt to the new service delivery model, the first licence review should occur two years into the program.

Should the first Licence Review be any different to later reviews?

This review should replicate future reviews, to enable the market and the Department to build a shared understanding of the process.

Chapter 5 – Specialist Licences

Should cohort specialists only be referred job seekers from their target cohort?

Specialists should be required to focus on their nominated cohort. There would be some value in considering options which would allow job seekers to exercise choice however, in limited circumstances by request, and with the agreement of a service provider where the job seeker wished to access a specialist service provider. This would be on a case by case basis.

This could occur for example, in areas where family groups seek to access services together.

Which cohort types should have specialists?

Based on our work within the employment services community, JobLife would recommend the inclusion of youth specialists (18 – 25 years of age), and specialists for job seekers living with disability. Both job seeker cohorts have unique and specific needs which would be well supported by specialist service providers.

What factors should determine where specialists are located?

Analysis on the available job seeker populations should form the foundation of where specialists are located and therefore the value a specialist could provide to this cohort. In addition to this, feedback from providers presented in tenders should be considered around need, noting that for example, disability cohorts may be underestimated in some data.

How should the new model interact with complementary programs (e.g. Transition to Work, Work for the Dole)?

The new model must ensure that it encourages collaboration and working between service providers. Current frameworks often prohibit through complex arrangements regarding servicing fees, shared case management and outcome rates.

We suggest that Disability Employment Services (DES) should be included as one of the key complementary programs that would interact with the new employment services model. This is particularly important given that the new Budget measures from 1 July 2021 regarding the eligibility criteria for DES will see a higher proportion of people with disability being referred to new employment services.

This highlights that there is a need for Disability Employment Services providers to work alongside specialist Employment Services Providers for participants with disability.

This further supports the need to have both DES providers continue to deliver services to people with disability and also the need to have specialist providers delivering mainstream employment services to people with disability.

Chapter 6 – Market share

How should market share operate?

JobLife support a model where market share is determined based on job seeker referrals.

How should tolerance work?

Tolerances should work to drive performance in the market and ensure job seeker choice. The proposed 20 percent appears to offer sufficient scope to achieve this operationally.

Chapter 7 – Red tape reduction

How can the licensing system help cut red tape?

The licencing system presents some opportunities to reduce red tape as it relates to moving in and out of the market. It would allow experienced service providers to move into and out of service areas easily, with reduced procurement arrangements. Licences of sufficient duration, and licence reviews also at realistic points will enhance this.

It should be noted, while tendering and procurement can create red tape in terms of the delivery environment, most of the red tape experienced in service delivery relates more to guidelines and advice on how a program should be implemented. A focus on ensuring guidelines for the program are clear, concise and enable providers to deliver services must be maintained as the program rolls out. Information Technology systems should also be designed to support delivery and reduce red tape. Access to high quality reporting will also assist.

Chapter 8 – Performance Framework and cyber security

What measures could be included in the Provider Performance Framework?

There are a range of measures which could be considered as part of any performance framework. Reflecting on our experience as a service provider, JobLife believes the following offer strong measures for performance:

- Referral to commencement rates
- Referral to placement rates
- Education and Pathway outcomes
- Client Feedback

In addition to this, JobLife note that the intention of this service is to work with job seekers with the highest barriers to employment. In doing so, greater consideration needs to be given for how to capture performance of providers as it relates to supporting job seekers to progress toward employment.

How can the department ensure job seekers and employers are receiving a quality service?

The Department must ensure that a clear vision for the program is set and communicated to the market around expectations for service delivery. This should include the extent to which the program is intended to focus on employment placement, versus compliance with mutual obligations.

Setting appropriate performance and payment measures will then guide provider behaviour and ensure that job seekers and employers receive a quality service.

Existing customer service and complaint mechanisms should be maintained.

Conducting post placement/engagement surveys with employers and job seekers may also yield feedback on services.

How can providers' cyber security be improved in the new model?

A dedicated Information Management system (such as ESS) should also be developed. Where possible, this should be developed with user feedback from existing service providers. This would limit the needs for service providers to establish or access third party software which could impact on cyber-security.

Chapter 9 – Next Steps

What would ensure an effective transition from jobactive to the new model?

To ensure an effective transition from jobactive to the new model, the Department should consider:

- Suitable timelines between the announcement of successful tenderers and the tender start date to allow providers to commence start up work.
- Early access to an IT system to support training of staff.
- Access to transition job seeker caseload in advance to allow providers to commence planning.
- Consideration of start-up/advance payments for organisations who require it.
- A clear communication strategy supported by the Department to relevant stakeholders (e.g. job seekers, employers, Services Australia).

JobLife Question and Areas for Further Clarification

In considering the Discussion Paper, JobLife has noted a number of questions which would benefit from consideration as the final arrangements are confirmed. These are detailed below:

Adaptation of the Model

- How will the model be reviewed to reflect the post-COVID operating environment? What changes will be required?

Panel and Licence Management

- How will Department determine there is a need for a specialist provider in a particular region?
- What arrangements will be the Department have in place to manage a provider that is both specialist and generalist?
- How will market share be determined/managed for specialists?

Intersection with other policy changes

- What consideration has the Department taken of specialist providers for PWD based on those participants that will now be referred/directed to jobactive providers given the new Budget Measures From 1 July 2021, regarding eligibility criteria for DES