

SETSCoP

Submission on the proposed licensing system for the New Employment Services Model

Settlement Engagement and Transition Support Community of Practice (SETSCoP) welcome the opportunity to submit a response to the discussion paper outlining the proposed licencing system for the New Employment Services Model (NESM).

SETSCoP is a national collaboration of settlement service providers across Australia, who assist vulnerable migrants and refugees under the Settlement Engagement and Transition Support (SETS) program. SETSCoP is facilitated by [Migration Council Australia \(MCA\)](#) to encourage the sharing best practice and expertise for effective settlement, in addition to collectively identifying issues and opportunities.

This submission is prepared by the SETSCoP Secretariat drawing on the input provided by SETSCoP members. SETSCoP acknowledges, in particular, the assistance of MiCare, CatholicCare Tasmania and Multicultural Australia in developing this submission.

The development of the NESM is timely as [Australia's unemployment rate](#) has risen to 6.9% and underemployment rate to 11.4%, due to the economic downturn resulting from the COVID-19 pandemic. Refugees represented on [jobactive caseload](#) have also increased from 33,804 (31 December 2019) to 52,000 (31 August 2020).

SETSCoP acknowledges the need for employment services to be redesigned, to better support newly arrived migrants and refugees to secure sustainable employment. According to the [Australian Government](#), 77% of refugees remain unemployed at 12 months post arrival, the rate lessens to 38% at 3 years after settlement and 22% at 10 years. This high level of unemployment demonstrates a systemic gap, which needs to be addressed through employment services responding to the needs of refugee and vulnerable migrant job seekers by providing tailored approaches and a focus on individual employment outcomes rather than on compliance.

Reforming the employment services model to better support vulnerable job seekers from migrant and refugee backgrounds, will enhance economic and social outcomes more broadly. [Evidence](#) highlights the value in investing in labour market integration for refugees and it leading to beneficial returns for not only individuals but Australia's social capital, workforce skills, reduced welfare dependence, increased tax revenues and building social cohesion among communities.

To maximise the effectiveness of the NESM for job seekers from migrant and refugee backgrounds, the implementation of the model must incorporate the following:

- address systemic issues around entrenched unemployment and underemployment of newly arrived migrants and refugees;
- work with settlement service organisations to successfully transition to the new model and to provide a coordinated approach to employment;
- focus on developing personalised plans and goals, and providing a service that is client-centric, culturally appropriate and holistic;
- imbed cross-sector collaboration, ensuring regular communication and collaboration among government agencies, employment services, settlement service organisations, industry and local communities;
- focus on developing job readiness skills, through work experience, volunteering, recognition of prior learning, vocational and professional training, functional English language skills and career pathways;
- identify and better support the most vulnerable to ensure they are not excluded, incorporating a strengths-based approach that provides opportunities for development and growth.

Considerations for policy development and recommendations

A move to digitalised and enhanced employment services

The introduction of Digital Services and Enhanced Services under the new model will allow for a more targeted and flexible approach for job seekers, providing options for service delivery including digital, phone and face to face engagement, that is dependent on need and job seeker preferences. It is essential for comprehensive and robust job-readiness assessments to be completed prior to classifying clients to be supported under Digital Services or Enhanced Services, to ensure that the correct supports are in place.

Self-management through a Digital Services portal will lead to more efficient and effective services for those who are job ready, providing appropriate autonomy and control over their employment pathway. Additionally, the cost-effectiveness of the Digital Services stream will allow for a greater investment of time and resources for those with barriers to employment and requiring additional supports, such as vulnerable individuals from migrant and refugee backgrounds.

Recommendations:

- Eligibility for Digital or Enhanced Services should be established through a thorough needs assessment and must consider a job seekers' job readiness, English language skills, digital literacy, digital access, and barriers to employment.
- Job seekers from migrant and refugee backgrounds who are deemed vulnerable in view of their pre-migration or settlement experiences or have significant vocational and non-vocational barriers to employment, including limited English or digital literacy skills, should be referred to Enhanced Services.
- Ensuring appropriate allocation to Digital or Enhanced Services will facilitate better outcomes and engagement among job seekers.

Structuring panels to facilitate learning and sharing of best practice

To maximise the value of panels, there should be separate specialist and generalist sub-panels, whereby specialists supporting similar cohorts are grouped together to facilitate the sharing of best practice, challenges and opportunities to better support their allocated specialist cohort. There would also be value in bringing all providers in an Employment Region together, less frequently, to discuss regional issues which may affect both generalist and specialist cohorts, in addition to encouraging collaboration between workforce specialists and cohort specialists. A national coordinating mechanism for the panels would facilitate the identification and discussion of systemic gaps and issues at a national level.

Recommendation: Introduce regular specialist and generalist sub-panels, and less frequent National and Employment Region panels.

A licensing system that encourages diversity and specialist knowledge

There is a need for more diversity in the employment services market through the licensing of specialist providers who hold expertise and can provide specialised services catered to particular cohort needs.

Cohort specialists supporting those from migrant or refugee backgrounds must possess additional skills and knowledge to mainstream providers, as they hold more complex caseloads and need to navigate additional barriers to employment for their clients. This level of intensity and expert knowledge must be factored into the adequate resourcing required to appropriately engage, support and secure successful employment outcomes for job seekers with numerous barriers. Further, there is value in providing greater incentives to work with long term unemployed and those with significant barriers, to ensure vulnerable job seekers are not further disadvantaged.

There is a strong argument for the licencing of cohort specialists who support job seekers from migrant and non-English speaking backgrounds, and specialist providers who possess further skills and understanding to support people from refugee backgrounds with their employment needs (e.g. understanding the impact of pre-migration trauma). It is anticipated that many specialist providers who possess the skills and knowledge to support refugee job seekers, will also have the necessary expertise to support those from migrant and non-English backgrounds more generally.

Specialist service providers supporting job seekers from migrant or refugee backgrounds should be located in priority settlement regions. Majority of job seekers referred to specialist providers should be from the target cohort, however in situations where there is a smaller number of job seekers from migrant and refugee backgrounds in a community, specialist providers can expand their services to support other job seekers. This is particularly pertinent for the viability of providers in regional areas who may have smaller numbers of job seekers from their target cohort.

Moreover, specialist providers should be allowed to service areas smaller than the Employment Region where there are target cohorts who require their expertise and

knowledge to facilitate long term employment pathways. New licenses should be added to a region on an as-needed basis, whereby, should a certain demographic or cohort requiring specialist support become more prevalent, such as a new migrant community, specialist licences would be added to provide them with employment support.

Recommendations:

- Ensure specialist cohort employment services are adequately funded to provide holistic and individually tailored support to enhance the job readiness of job seekers from migrant and refugee backgrounds who possess significant barriers to employment.
- Consider implications for specialist cohort employment services who are in regional areas, ensuring greater flexibility and adequate funding.

Ensuring quality services that are coordinated, culturally responsive and address intersectionality

To ensure Australia's employment services deliver meaningful outcomes for job seekers from migrant and refugee backgrounds, there would be benefit in imbedding a robust evaluation mechanism to collate feedback from employers, individual job seekers, settlement organisations and communities. A focus on the continual improvement of employment services for this cohort, would enhance 'job seeker to position' matching and would significantly improve the sustainability of employment post placement.

A coordination and place-based approach to the NESM is required, whereby government agencies, employers, settlement service organisations and communities collaborate and share common goals to boost the employment of newly arrived migrants and refugees. A system that encourages and provides incentives for regular cross-sector collaboration and coordination, will assist in uncovering labour market shortages, facilitating the appropriate matching of job seekers to positions and the identification of systemic challenges or issues to be resolved. Additionally, there is value in developing a system that works with AMEP providers and offers a stronger interplay between employment services and English development.

Establishing a specialist employment services workforce to support job seekers from migrant and refugee backgrounds requires specialised training to develop the expertise and skills required to service this cohort effectively. Smaller organisations who hold knowledge in the settlement of migrants and refugees, such as small settlement service organisations, require employment services training and professional development opportunities to upskill staff in the employment and to effectively enter the employment provider market.

Intersectionality, the nature of social categorisations overlapping across groups to create interdependent systems of discrimination or disadvantage, needs to be addressed in the proposed model. For example, a woman who has recently arrived on a 204 Women at Risk visa, may have numerous barriers to employment including being a single parent, limited Australian work experience, traumatic pre-migration or in-transit experiences including torture or violence, mental and physical health issues, poor English language skills and limited

digital literacy skills, is likely to experience significantly more complex challenges to entering the workforce. The interplay between, and overlapping of, barriers further exacerbates disadvantage for job seekers and may lead to long term unemployment.

There is an opportunity to assess the cultural responsiveness of services delivered by employment providers and embed this within the Provider Performance Framework. Meeting cultural responsiveness requirements may include key performance indicators such as ensuring adequate use of interpreting services, protocols and policies which align to supporting culturally and linguistically diverse populations, staff training, and addressing intersectional disadvantage experienced by vulnerable clients. Additionally, the performance framework should focus on achieving sustainable employment outcomes while meeting the needs of both the job seeker and employer. Meeting performance targets and outcomes that are in line with individual job seeker employment pathways, may serve as a pre-requisite for renewal of licenses.

Recommendations:

- Embed evaluation and feedback mechanisms for employment services.
- Assess cultural responsiveness of services, engagement of interpreters and addressing intersectionality when monitoring performance.
- Provide ample opportunity for migrant and refugee specialist services, such as settlement service organisations who possess cultural responsiveness capability, to enter the employment services market.

To discuss this submission further, please contact SETSCoP Secretariat at secretariat@setscop.org.au or (02) 6162 0361.