



# Consultation Paper – Transition to Work (TtW) 2022–2027

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## Consultation Paper Response Form

**Guidance:** You are invited to provide feedback to any or all of the questions in the Consultation Paper in the relevant sections below.

Provide your organisation's name and other details as applicable, to assist the department consider your feedback.

Please use the "Consultation Paper Other Feedback" section for any additional comments.

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## Question for feedback – Assessment, referral and eligibility

4.1 What primary risk factors that contribute to young people disengaging from work or education should be used to determine eligibility for Transition to Work services?

Feedback to Question 4.1

BSL welcome the proposed expansion of TTW eligibility to include those with complex non-vocational barriers that contribute to disengagement from education and employment. We recommend this expanded eligibility include:

- Young people linked to statutory service including OOHC and those transitioning from care and young people connected to or transitioning from youth justice orders or settings.
- Young people experiencing homelessness, family violence, AOD, mental/physical health challenges
- Young people who have disengaged from school (bullying, culture, financial)
- Aboriginal and Torres Strait Islander young people
- Newly arrived young people

15-19 year olds disengaging from school: TTW also needs to be an exit point in consultation with the school well-being team and careers team and the TTW provider for young people disengaged from mainstream education

Young people should also be able to self-refer where they identify significant barriers to gaining employment but are motivated to pursue education and employment goals.

The Department should also consider the inclusion of young people with a disability within TTW. This would require additional structural changes and formal inclusion of young people with a disability within TTW's scope would require providers to access the range of supports and incentives that DES can currently offer such as wage subsidy and other necessary supports (i.e, assistive technology & work place modification) to go to work.

## Questions for feedback – Maximum duration of service for participants

5.1 What characteristics should be used to determine whether a young person has complex, non-vocational barriers and requires the maximum of 24 months of servicing?

Feedback to Question 5.1

All young people experience challenges and risks which are shaped by a combination of individual, familial, geographic, structural and institutional factors. The challenges young people face are multifaceted and not experienced uniformly, and while many are able to navigate this transition successfully - usually with the financial and emotional support and guidance of their family - some are particularly vulnerable to being left behind. All young people accessing TTW are by definition those who are experiencing disadvantage and are at risk of long term unemployment. All young people in TTW therefore, including those incorporated through an expanded eligibility criteria should be considered for 24 months of servicing.

A young person's needs and experiences may change during their engagement with TTW. Therefore providers should have the flexibility to determine which young people require the maximum 24 months of servicing and to tailor a service response that can flex to the changing needs of young people.

BSL recognises that the JSCI can play an important part in determining eligibility and the length of service a young person requires within TtW, however we believe there are a number of important factors that should be considered in terms of how the JSCI is explained and delivered, as well as some additions in terms of expanding its scope. This includes:

- providing young people with a clear explanation and reassurance about the purpose of the JSCI
- providing young people with assurances about privacy of their disclosures and negating any fears about possible impacts of disclosures on access to income support
- providing young people with an option to be supported by a youth worker or trusted support when filling in the JSCI and not just relying on an online assessment
- Inclusion of Questions about:
  - geographical isolation, social isolation and internet connectivity
  - the length of time a young person has been disengaged from EET
  - assessment for a disability and additional support

## Questions for feedback – Maximum duration of service for participants (Continued)

5.2 In addition to extending the maximum duration of service, are there any other changes needed to support Transition to Work providers in effectively servicing an increased number of young people with complex, non-vocational barriers?

Feedback to Question 5.2

BSL believes that TTW providers should be required to demonstrate that they are embedded in their local community and that in addition to collaborative mechanisms for engaging with local employers and industry and mainstream services such as schools, TAFE, health providers and industry, they are required to demonstrate collaborative partnerships with:

- local, state and federal funded support services,
- including statutory services local homelessness, AOD, family violence and youth justice and community services to ensure that they can effectively service and integrate supports for young people with complex non-vocational barriers

Access to quality training and education, real work experience opportunities, and specialised support necessitates contributions from education providers, employers and health providers respectively. Community embedded organisations hold considerable social capital through networks with other service providers, education and training providers, local council, employers and individual citizens

Effective engagement with community stakeholders depends upon the expertise and capability of the provider and the staff they employ. Providers should be required to demonstrate that all staff will receive adequate training and /or employ a dedicated staff member with relevant qualifications to support young people with complex non-vocational barriers .

BSL also recommends that to effectively service an increased number of young people with complex non vocational barriers, there should be some flexibility in the requirement for young people to participate in 25 hours of activities. This could include recognising activities in a young person's employment plan that are being undertaken in other services and which contribute to a young person's health and wellbeing or other related activities that can be attributed to building work readiness.

Effectively engaging disadvantaged cohorts also requires a specific focus on youth specific practice. This can be the difference between a good service model working or not. It is the **combination of the model and the practice approach that is key to motivating (activating) and inspiring (incentivising) young job seekers to engage in education, training and work.**

Broadly speaking, best practice in working with young people involves:

- **Being knowledgeable of and responsive to the circumstances of young people**, including cognitive and emotional development; the differing needs, capabilities and agency of young people in comparison to adults; and the youth specific specialised state based education and support systems.
- **Face-to-face, intensive support** to develop enabling relationships based on trust.
- **Capabilities focused approaches** which prioritise attention on talents, abilities and potential, rather than deficits.
- **A combination of one-on-one and group work** to enable young people to discover their own aptitudes, talents, weaknesses and strengths. Group work can help in the development of key transferrable skills that are important in the professional world, as well as developing knowledge and attitudes in various areas. Kohler FW & Strain, PS 1990, 'Peer-assisted Interventions: Early promises, notable achievements and future aspirations', *Clinical Psychology Review*, 22.
- **Experiential or applied learning** as opposed to classroom based pedagogies to enable young people to explore, create and apply knowledge first hand within and across a range of authentic and meaningful contexts. Blake, D & Bowling, B 2011, 'Youth literacy development through applied learning and the national curriculum', in B. Doecke, G. Parr & W. Sawyer 2011, *Creating an Australian Curriculum for English: National Agendas, Local Contexts*, Phoenix Education, Putney, NSW, pp. 139 -54.
- **Structured but flexible delivery which provides a clear pathway** through the program, allows time for exploration and builds as motivation increases.

- **Culturally responsive**, particularly for Indigenous young people and newly arrived and refugee young people.

## Questions for feedback – Maximum duration of service for participants (Continued)

5.3 What circumstances in a young persons' life should determine whether they are transferred to online services or to an Enhanced Services provider at the end of their service period in Transition to Work?

Feedback to Question 5.3

BSL believes that factors that determine whether young people are transferred to online or enhanced services at the end of their TTW service period should be based around:

- young people's capability and choice
- young people's access to computer, phones and internet
- young people's access to a locally available and relevant Enhanced Service Provider

Young people with ongoing complex needs should have the option of staying with TTW. This option would be for young people who are engaging with the service and are making progress towards their work readiness. Online servicing for this cohort is likely to be inadequate and could in fact, reverse progress that has been made in TTW.

## Questions for feedback – Improving attendance at the initial appointment

6.1 Would a mechanism that helps facilitate commencement of young people in the service be desirable?

Feedback to Question 6.1

BSL believes that young people eligible for TTW are best supported by TTW rather than Jobactive and usually benefit from and have a high degree of engagement with the service once they commence.

A mechanism that helps facilitate commencement of young people in the TTW service would encourage those who do not have adequate information about the service to attend their initial appointment and start their journey with TTW.

## Questions for feedback – Improving attendance at the initial appointment (Continued)

6.2 What is your preferred approach to achieving commencement and why?

Feedback to Question 6.2

BSL believes that TTW needs to be clearly defined and marketed to young people so that they understand the service and benefits for them in attending the TTW service. We believe that these materials should be co-designed with young people, TTW providers and Centrelink.

While our preferred approach for achieving commencement is an incentive based approach, if the proposed temporary suspension of income support is utilised as a mechanism to increase commencement, it is imperative that:

- Any income suspension should be temporary and able to be quickly and easily lifted when young people attend their first appointment.
- Exemptions should be enabled for young people who make contact but are unable to attend due to reasonable circumstances.
- Young people should also have adequate warning before any suspension of payment is enacted.

It is critical that this mechanism does not contribute to or enhance young people's disadvantage.

## Questions for feedback – Performance Framework

7.1 What elements should the Department use to measure achievement of Education Outcomes?

Feedback to Question 7.1

BSL believes that the Department should consider measuring both **progressive** educational measures as well as **outcome** measures. This is particularly critical with the expanded inclusion of disadvantaged cohorts with complex non-vocational barriers. Young people need to develop both foundational and transversal skills, that are valued by employers, and that will build capabilities and skills that can be applied in relational and everyday contexts of life and work. These core skills are an important foundation for young people, particularly those who are experiencing disadvantage, both to progress ongoing learning and workforce participation throughout their lives. Foundational level qualifications, along with structured workplace learning programs are a critical component of embedding these skills and preparing young people for successful workforce readiness. These skills are separate from more technical or industry specific workplace competencies or licenses such as RSA, white card or forklift licences, which are also important and can be complimentary, but which service a different function.

*Progressive education and training measures should therefore include participation and or completion of Certificate I and II and pre-apprenticeship courses, as well completion of skill sets and structured workplace learning experiences, particularly when these courses are linked to industry and employment placements and experiences. Participation in these courses are important for training and career exploration for young people and are important re-engagement and success milestone for young people experiencing disadvantage.*

It is also critical that young people are encouraged to combine work and learning so that they can continue to build their capabilities. As such we would recommend that Cert II is recognised as contributing to a Hybrid outcome.

Further research is required to fully incentivise providers to support education pathways for TTW participants. Research should look at the relative prospects of young people in particular industries according to qualification levels, from certificate I level through to degree level qualifications. This research could be informed by, but not should not be confined to TTW administrative data



## Questions for feedback – Performance Framework (Continued)

7.2 How should the Department seek to ensure job seekers and employers are receiving quality of service from Transition to Work providers?

Feedback to Question 7.2

BSL believes that meeting outcomes targets and sustainability are key measures that indicate quality of service for TTW providers.

Additional measures could include survey measures that are co-designed with employers and young people.

For young people surveys should include measures around:

- capability development
- agency in decision making
- vocational guidance
- involvement in service design/delivery and timeliness

For employers, surveys should include measures around:

- level and quality of engagement between employers and TTW provider
- Satisfaction with candidates and their readiness for employment opportunities
- ease of navigation and access

Mechanisms that allow employers and young people to contribute to service design and delivery should also be considered.

## Questions for feedback – Performance Framework (Continued)

7.3 Are there any other meaningful measures that could be included in the Provider Performance Framework?

Feedback to Question 7.3

In addition to measures outlined above, additional measures could include:

- Number of young people participating in career exploration (e.g., work experience or work tasters)
- Types of opportunities offered through Provider engagement with industry and employers and engagement in these activities
- Young people's engagement and participation in activities linked to their plan, including activities related to non-vocational barriers
- Activities and performance of collaborative mechanisms with key stakeholders in the local community supporting the growth of employment pathways for young people

Mechanisms that support collaboration between providers such as communities of practice that facilitate continuous improvement and learning opportunities through sharing networks and best practice to deliver improved services for jobseekers. The diverse value generated by CoPs is realised on the individual level (improved skills and capability for staff, outcomes for service users) and the organisational level (improved performance and efficiency), in turn resulting in value for government.

## Questions for feedback – Performance Framework (Continued)

7.4 What improvements could be made to the current review and allocation of the Funded Places process?

Feedback to Question 7.4

BSL believes Annual Funded Places should be reviewed every six months, rather than quarterly, because it is difficult for providers to plan effectively to manage resourcing and budgets with uncertainty around caseloads.

AFP should be allocated in consultation with the provider to enable the provider to contextualise the utilisation and to ensure the process is transparent.

## Questions for feedback – Performance Framework (Continued)

7.5 What factors should the Department account for when determining Funded Places?

Feedback to Question 7.5

BSL believes that TTW providers should be consulted about their total caseload rather than just reviewing their active caseload on ESS as a number of young people in PPS will not be on the active caseload which impacts utilisation.

## Questions for feedback – Performance Framework (Continued)

7.6 How might performance be benchmarked in the new model?

Feedback to Question 7.6

On a principles basis BSL supports a flexible funding model that enables upfront investments in the capabilities of the young person and agree that a funding model which is weighted more to service fees than Outcome Payments and gives equal value to Employment and Education Outcomes is critical to supporting young people experiencing disadvantage.

We support the inclusion of number of factors in benchmarking performance including consideration of:

**contextual factors:** including local labour market data, access to relevant and related education and training opportunities, geography, composition of population and size of market share. This data should include for example analysis of labour market changes over time, entry level jobs per industry and industry type

**mechanisms to assess performance:** based on outputs and outcomes. We support a combination of up front, bonus and outcomes payments that allow an initial investment in servicing disadvantaged cohorts with smaller caseloads. This allows providers to work intensively with young people to identify training and education opportunities which will help young people develop the skills and attributes employers are looking for.

**mechanisms to assess quality** of performance according to young people and employers. This could include surveys, co-designed with employers and young people and include measures around capability development, agency, involvement in service design and delivery, engagement, timeliness and employment readiness.

**collaborative mechanisms** to drive continuous improvement and sharing or practice expertise and innovation between providers .

## Question for feedback – Youth Advisory Sessions

8.1 Is there anything that the Department should change or improve in the way that Youth Advisory Sessions are currently running?

Feedback to Question 8.1

BSL recommends the following mechanisms to improve take up and access to YAS:

- Direct marketing to young people about the YAS should be sent from the local TTW provider in collaboration with the Department
- TTW provider to be able to manually refer and book YAS sessions
- Maintain current funding arrangements to allow continuation of a flexible individualised approach to the sessions based on the needs of the young person and delivered by a youth coach with career guidance and development expertise when required

## Questions for feedback – Other Service Settings to improve outcomes

9.1 Is there anything in the Transition to Work program that should change in order to have the right balance between ensuring national service standards are maintained, while also allowing providers the flexibility needed to enable local collaboration and engagement in their communities?

Feedback to Question 9.1

BSL believes that enabling local collaboration and engagement in communities should be recognised as core work of Transition to Work and a critical part of achieving improved outcomes for young people.

The place-based mechanism of Community Investment Committees should be a core part of the TtW model, and TtW providers should be mandated to co-chair and play a lead role in coordinating CICs, enabled by the National Youth Employment Body (NYEB).

Local CICs bring together representatives from industry, VET, community, all levels of government and employment services to develop place-based solutions to meet the needs of young people and local business.

Running parallel to the Local Jobs and Skills Taskforce in each region, the NYEB would enable CICs to provide a community led, youth specialist response that aligns existing investments in a region and facilitates coordinated and collaborative supply and demand side responses to youth employment .

NYEB has a key enabling role in working with TtW providers to foster cross-sectoral, collaborative community led relationships that create transformational structural change which translates into real job opportunities that meet the needs of young people and employers.

Findings from the National Youth Employment Body, led by the Brotherhood of St Laurence, show that the coordination of a local CIC by the TtW provider leads to:

- Increased collaboration with employment and support services, employers, government and training providers to co-design local training and employment pathways
- Improved understanding of and engagement with local growth industry sectors
- Improved capacity to adapt and innovate strategies to support young people, through increased access to and mobilisation of labour market data, multi sector expertise, local investments and networks
- Increased connection and exchange of local and national knowledge, including participation in the Local Jobs and Skills Taskforce
- Increased local and national understanding of the barriers and enablers to quality youth employment and the implications of this for local economic development
- Increased community willingness to build relationships with providers and invest in the capabilities of young people.

## Questions for feedback – Other Service Settings to improve outcomes (Continued)

9.2 What role can the Transition to Work service play in ensuring that young people are engaged in the design and delivery of policy and services?

Feedback to Question 9.2

BSL believes that commissioning for TTW should include specifications around the development of mechanisms for young peoples' meaningful contribution to the service design and which provide them with opportunities and support to have voice and agency in decisions that affect them. Mechanisms should be demonstrated in a youth participation plan, and could include support to:

- Participate in a locally developed youth participation group such as a youth alliance or youth advisory group;
- Share their employment pathway and experiences with other young people, employers, training providers and other key stakeholders in the employment system, through forums such as video, social media, and information sessions.
- Participate in activities to build leadership capabilities.

The Department should also consider resourcing the establishment of a National Youth Advisory Group. This could be facilitated through the NYEB and would enable young people to contribute to:

- service development, design and refinement, through lived experience perspectives
- Development of strategies and programs at local, state and national levels
- Participate in key decision making groups e.g., to the Community Investment Committee, Local Jobs and Skills Taskforce, organisation boards and NYEB Governance Groups.



## Questions for feedback – Other Service Settings to improve outcomes (Continued)

9.3 Is there anything in the current service settings that might be seen as limiting youth engagement?

Feedback to Question 9.3

### **Providing Accessible and Youth friendly spaces**

BSL believes that requirements around service delivery should mandate for the provision of an engaging space for young people that reduces power imbalances and negative perceptions around service users. This requires being intentional about the design and decoration, as well as access to the service. Design features should promote transparency and engagement between young people and staff and should intentionally promote a sense of belonging and engagement for young people accessing the service. This should be done by including young people in the design. Service delivery should also be accessible for young people and where possible should be easily accessible by public transport and in close proximity to other mainstream services.

### **Structural Barriers**

Access to transport is a key barrier for young people's engagement in training and work opportunities, especially in outer urban and regional/rural areas. Limitations include:

- Public transport cost, availability, or schedules that are not aligned to the timing or location of education opportunities that may be several towns away, or to take up work, especially shift work of casual jobs.
- No access to finance, a car or licensed individual to gain the hours of experience needed to gain a driver's license which excludes jobs that ask for, or internally lock out young people without, a license and/or car.

Geographical Isolation for remote services and smaller regional sites can pose a barrier youth engagement. This can prevent challenges in terms of access to diverse education and training opportunities as well as access to other services and resources. It is critical that services have access to support appropriate online capability and resourcing to enable connectedness both with other participants as well as with broader community opportunities. Additional flexibility in terms of compliance and service delivery is also required to enable tailoring of the service to place.

### **Onerous Administrative and compliance requirements**

Data and compliance requirements of the TTW service have the potential to limit young people's meaningful engagement in the service and the types of outcomes that they achieve. Improvements to ESS to improve useability will assist in redressing the balance between the amount of time staff spend on administration and monitoring with that of their direct work with young people and employers.

## Questions for feedback – Other Service Settings to improve outcomes (Continued)

9.4 What do you think constitutes best practice with regard to supporting the mental health of participants in an employment service and how do we improve the ability of the service to deliver to this standard?

Feedback to Question 9.4

BSL welcomes a focus on supporting the mental health of participants in TtW.

Best practice for employment providers to support young people's mental health include:

- Adoption of capabilities informed practice such as Advantaged Thinking and coaching which holds high aspirations for young people and provides young people with agency and choice over decision making.
- Enabling flexibility in engagement and participation requirements for young people who are experiencing acute episodes of poor mental health.
- Partnerships with mainstream providers to provide an integrated and joined up response, that promotes sharing of resources and co-designed activities and supports, where appropriate.
- Streamlined referral process to expedite access to specialist services where available.

Improving the ability of providers to deliver mental health services should also include:

- Investment in the development of a specific mental health offer for TTW, which includes the development of training and resources that are co-designed with mental health providers, young people and TTW services.
- A national roll out of training working with young people with mental health challenges
- promotion of continuous learning mechanisms which share best practice with other providers as well as training and development opportunities provided through specialist providers.

Other more tailored best practice programs that could be considered for trialling within TTW services or in collaboration with partners is the *Individualised Placement Support (IPS)* program. IPS 'provides individualised support to meet the needs of people with mental illness who are seeking to gain or remain in employment'<sup>1</sup> (KPMG Consulting 2019, Final report for the evaluation of the Individual Placement and Support Trial, Department of Social Services, Canberra, p.i).

A recent review of different disability employment interventions found 'evidence for a beneficial effect of IPS compared to traditional vocational rehabilitation or other control condition on open employment outcomes' for people with psychosocial disability (Kavanagh A, Brown D, Dickinson H, Mallett S, Marck C, Weld-Blundell I. 2021, Economic Participation and Employment - Summary Report, The University of Melbourne, p.27).

KPMG's evaluation of IPS implementation in headspace sites across Australia also found that the program (modified to include an education component) 'improved the vocational education and employment outcomes for trial participants, with around 43 per cent of all participants achieving an education or employment outcome'<sup>1</sup> (KPMG 2019, p.65).

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## Questions for feedback – Other Service Settings to improve outcomes (Continued)

9.5 What are appropriate servicing strategies or principles in situations where there are longer waitlists for specialist services, in contrast to locations where there are readily available specialist mental health services?

Feedback to Question 9.5

Where there are long waitlists for specialist services, we recommend that providers:

- Recruit staff with specialised qualifications
- Develop partnerships with specialist providers that enable tailored service offerings, flexible access and/ or co-located staff
- Embed programs such as IPS

For locations with comparatively good access to specialist providers, place based partnerships that encourage streamlined referral and sharing of information and resources to avoid duplication of service offers and promote best practice should be prioritised.

## Questions for feedback – Other Service Settings to improve outcomes (Continued)

9.6 What are the features of a service that acknowledges the significant mental health challenge across the youth caseload and embeds appropriate responses into the default service offer, including by addressing particular issues such as disclosure and stigma?

Feedback to Question 9.6

Governments and service providers typically focus on identifying the problems facing young people experiencing disadvantage and respond with crisis-based policy and practice. However, a focus on problems diminishes social views of young people's potential to gain skills and contribute positively to their community. Positive change is needed in our whole approach to working with young people experiencing disadvantage and exclusion, including a transformation of the language we use and the objectives that services seek to implement. Evidence shows that believing all young people have talents that can be developed increases individual and community expectations of, and efforts to enable, young people to reach their full potential.

Young people take diverse pathways into adulthood, and do not necessarily follow a linear or prescriptive path meeting definitive milestones along the way. To assist a young person to navigate through this transition, a model and approach such as that delivered by the TtW Community of Practice, starts with where individuals are at and strives to enable each young person to identify who they are now, who they want to be in the future and what they want to do. It does this by:

- assisting them to recognise, value and develop their capabilities and talents - in short, to establish their talent to thrive
- empowering them to build the foundations for a sustainable livelihood
- engaging in campaigns and influencing agendas to transform the institutional settings that prevent young people from realising their potential.

As a youth employment service, the primary scope of Transition to Work is to enable young unemployed people to achieve **education and/or employment** outcomes. While engagement in secure, fulfilling and sustainable employment is critical to young people becoming independent adults, we know that their capacity to engage with education and/or work is predicated on a number of other domains in their life, which include the following:

**Health and wellbeing** - encompassing not just physical health, but also emotional, mental and social wellbeing. People with mental illness have 'low levels of high school completion, low levels of labour force participation and high rates of unemployment levels', in spite of their desire to complete their education and enter the workforce.<sup>55</sup> In order for young people to achieve their goals in employment and/ or education, they need the skills, capabilities and resources to address their health and wellbeing challenges.

**Housing and material resources** - stable housing is crucial for health and wellbeing, as well as for engagement in education and employment. This is evidenced by research that examines the negative health impacts that precarious housing can have on both physical and mental health.<sup>56</sup> Developing the skills to access and sustain adequate housing, as well as maximising the education and training opportunities that have the potential to increase earnings, will limit the ill-effects of precarious housing.

**Social and community connections** - relationships with people who value and support you are known to have a positive effect on wellbeing. These relationships build self-esteem and motivation to engage with others and the broader community. Young people experiencing disadvantage often feel disconnected from their community, and require opportunities to build networks, including those that enhance their social capital and enable them to connect to the community and access employment and other opportunities.

Referral to specialist services to address non-vocational challenges is a critical aspect of supporting young people to thrive in the domains outlined above. However, the Advantaged Thinking practice approach used in the CoP Model, outlined in this Section, is also a key vehicle for supporting young people to address challenges. Once young people are able to recognise their own capabilities, they often gain confidence and motivation to develop their interests further or the inspiration to pursue other interests and passions. This does not mean that their needs or problems are overlooked; rather, that they do not become the focus or the motivating force for their engagement with services. service enables the development and delivery of a new approach to working with young people - a model for youth that invests in young people and is designed to deliver the skills, opportunities and networks that create effective pathways into the labour market. How we view and value young people influences the way we work with them and their access to resources that enable them to transition into independent adulthood.

## Consultation Paper Other Feedback

If there are any comments you wish to provide that are not already captured, please provide them below.

Feedback to Consultation Paper - Other

BSL believes that recognition of place is pivotal to the delivery of employment services. Unemployment - like

other social and economic issues - has a strong geographical dimension, and the opportunities and networks jobseekers need are both enabled and curtailed by local community context.

A recognition of the ways place shapes employment opportunities can, and should, be embedded across the commissioning process; from the Tender Specifications (e.g. encouraging providers to detail how they will be responsive to local labour market conditions or concentrations of particular populations in place, such as high number of newly arrived or Indigenous young people), through to how outcome targets are set (including recognising the value of progressive outcomes in areas of concentrated disadvantage or thin labour markets).

Service design and implementation, including Tender Specifications and Deeds, should aim to balance fidelity to the evidence based service offer and practice, with the flexibility to contextualise this offer to local social, economic and cultural conditions.

Considine, M et. al. 2018, 'The Policymaker's Dilemma: The Risks and Benefits of a 'Black Box' Approach to Commissioning Active Labour Market Programmes', Social Policy and Administration, Vol. 52,

Knowledge of local labor markets as well as deep, collaborative networks in a community are essential for the delivery of evidence informed employment services that are attuned to, and can adapt to, local conditions. It is through this knowledge and networks that frontline staff can develop and leverage appropriate opportunities for young jobseekers. Local providers, who in some cases may be smaller organizations, are best placed to understand their communities and deliver the collaborative, evidence informed models we have outlined. However, as outlined previously, many of these providers have been squeezed out of the employment services market as they are unable to compete in tender processes with larger providers (for profit and not for profit). Moreover they often lack the back of house resources to adequately resource compliance components of the contract and demonstrate the efficacy of their work with jobseekers.

Innovative commissioning models provide one solution to this problem. Intermediary bodies could be commissioned to support smaller providers to be competitive in the employment services market. There are multiple examples within and beyond the employment service sector of different forms of intermediary bodies being used to mediate government's need for upwards accountability with the flexibility to develop services tailored to local community need.