



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

**NOTE:** This form is a SmartForm designed to be used in Adobe Acrobat Reader. Adobe Acrobat Reader software must be set as the default program for .pdf documents. If you do not do this you may experience difficulties using this form. If you do not currently have the Adobe Acrobat Reader software program, it is available as a free download from the Adobe website - [get.Adobe.com/reader/](http://get.Adobe.com/reader/)

## 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.

Organisation Name:	National Employment Services Association		
Contact Name:	Damien Opolski	Contact Phone:	[REDACTED]
Contact Email:	[REDACTED]		

### Important

Please note that your submission will be published on the Department of Education, Skills and Employment (the department) website unless you do not agree to its publication and indicate your preference below.

Your personal information is protected by law, including the *Privacy Act* 1988 (Cth). The department's privacy statement and policy can be found on the departments website ([dese.gov.au/privacy](http://dese.gov.au/privacy))

The collection of your personal information is to allow the department to contact you, if necessary, to clarify your feedback.

We value your privacy, and will adhere to the selection you make to one of the options below:

- I agree to the department publishing this submission including personal details (Organisation Name and Contact Name only).
- I agree to the department publishing this submission without personal details.
- I do not want the department to publish this submission.

## 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

NOTE - THE NESA RESPONSE IS CAPTURED IN SECTIONS 4.1 AND 5.1

NESA welcomes the government's ongoing commitment to Transition to Work and the role it will play as the specialist 'youth service' in the New Employment Services Model. NESA has assessed the TTW Consultation Paper and consulted with members and is broadly supportive of the proposed model.

The key to the future success of TTW will be in ensuring that the features which have made TTW such a successful program are built upon and further improved in the new model.

NESA believes that young people who look to TTW do so with the hope and anticipation that TTW will make a difference to their lives and help them forge a new and fulfilling direction. At the centre of this is the anticipation that both TTW and the local community will be able to meet these expectations. Young people will be wanting the opportunity to engage with a case manager/support person/TTW organisation who has the capability and capacity to really assist them. They will be hoping that the things they are looking for to make a difference in their lives will be available to them when they are ready to commit. One of major risks to assisting disadvantaged and disconnected young people is that the necessary services - counseling, education and training, drug and alcohol support, real work experience with real job opportunities and stable housing etc. are sometimes not available when needed. DESE needs to ensure that TTW funding reflects that some of the young people entering the program will require significant assistance to access a range of services over an extended period of time.

Providing meaningful support and opportunity for our most vulnerable young people requires a whole of government and whole of community commitment - with great importance placed on local collaboration and solutions.

The importance of local collaboration is supported by the findings of the National Youth Employment Body, led by the Brotherhood of St Laurence, which shows the benefits of local Community Investment Committees that bring together local stakeholders to develop local responses.

NESA is, however, broadly supportive of the proposed model, and welcomes the retention of some of the most successful elements of the existing program, in particular:

- ñ A non-competitive service delivery arrangement that supports sharing and collaboration.
- ñ Exclusion of the Targeted Compliance Framework.
- ñ Continued eligibility for those not on income support.
- ñ Demand driven funding to ensure that places are available for all eligible young people.
- ñ Retention of Upfront Payments and the equal value placed upon employment and education outcomes.
- ñ A continuing commitment to Youth Advisory Sessions for digital participants.

NESA endorses a number of the new elements, in some cases with qualification:

- ñ The expansion of the eligibility criteria and a commitment to demand driven funding will ensure all young people with complex non-vocational issues have the opportunity to participate.

Providers welcome the opportunity to identify risk factors around disengagement (Question 4.1) but feel that the current JSCI has limitations in assessing some of the risk factors that young people face. NESA members look forward to working with the Department to develop a 'fit-for-purpose' assessment tool. Providers are, however, concerned about the reluctance of young people to disclose information in an assessment process that they feel may be used to their detriment. One of our major TTW providers would like to see an opportunity for youth workers to assist young people through the assessment and referral process. Similarly, there is support for a form of 'post-transfer support', where TTW providers can provide some form of ongoing

assistance and guidance for those young people who have transferred to digital servicing (5.3). This might be in addition to the Youth Advisory Sessions which may be targeted those who have been exclusively in the digital service.

ñ The proposal for a 'one-off income support suspension mechanism' (6.1. 6.2) as a tool to maximise initial engagement with young people has qualified support. It will be important to build in protections that allow for fairness and discretion.

ñ The Department seeks feedback on the circumstances in which participants might have the maximum 24-month service period (5.1). NESAs believe that TTW providers are best qualified to determine the length of service. This is consistent with DESE's ongoing commitment to the 'flexible servicing' principle which has been such a strength of the program. NESAs believe that, subject to guidance and consideration, length of service should be determined by providers on a case-by-case basis.

ñ cont. in next section

## 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

cont from previous section...

ñ The Department is proposing a more robust Performance Management Framework, in part with the objective of identifying 'poor' performers. NESAs agree that a fair and robust framework will help ensure quality and therefore confidence in the program. The Department is proposing a series of performance measures and invites feedback from intending providers (7.2 and 7.3). NESAs agree that a robust performance framework comprise of measures around effectiveness, efficiency, and quality. NESAs note in particular the following quality measures in the paper:

- 'participant experiences on their progress to employment'
- 'participant satisfaction'
- 'employer satisfaction'
- 'Account Manager assessment of the quality of services provided on the ground'.

NESAs believe that significant provider consultation will be required to ensure that quality measures are fair, valid, flexible and reliable.

NESA members have identified some areas of concern:

ñ Members are concerned by the lack of detail around Outcome Payment rates. Their omission means it is not possible for providers to assess the proposal to de-link Outcome Payments from the Outcome Performance Target/Bonus payment model. Providers need to know the value of an Outcome Payment to do the necessary modeling required to determine the 1) number of outcomes and 2) value of Outcome Payments necessary to compensate for the removal of the Outcome Bonus Payment. The Outcome Bonus Payment is currently \$3619 (ex GST) and is paid for each outcome that exceeds the Quarterly Outcome Performance Target.

Details around Outcome Payment rates will allow providers to undertake the financial modelling necessary to assure themselves that the funding model supports:

ñ the continuation of relatively small caseloads in an environment where DESE estimates that average point of time caseloads will remain at approximately 40,000 into the future.

- ñ The possibility that a higher proportion of the caseload may require more intensive servicing on the basis that a higher proportion of the caseload may present with complex non-vocational barriers.
  
- ñ Members are also concerned that the Department has limited the scope of consultation to areas unrelated to TTW policy, which the Department says is 'fixed and not subject to change'.
  
- ñ Of additional concern is the short 16 day timeframe for response, which NESAs believe limits the ability for providers to make more detailed responses.

END

### 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

### 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



## 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

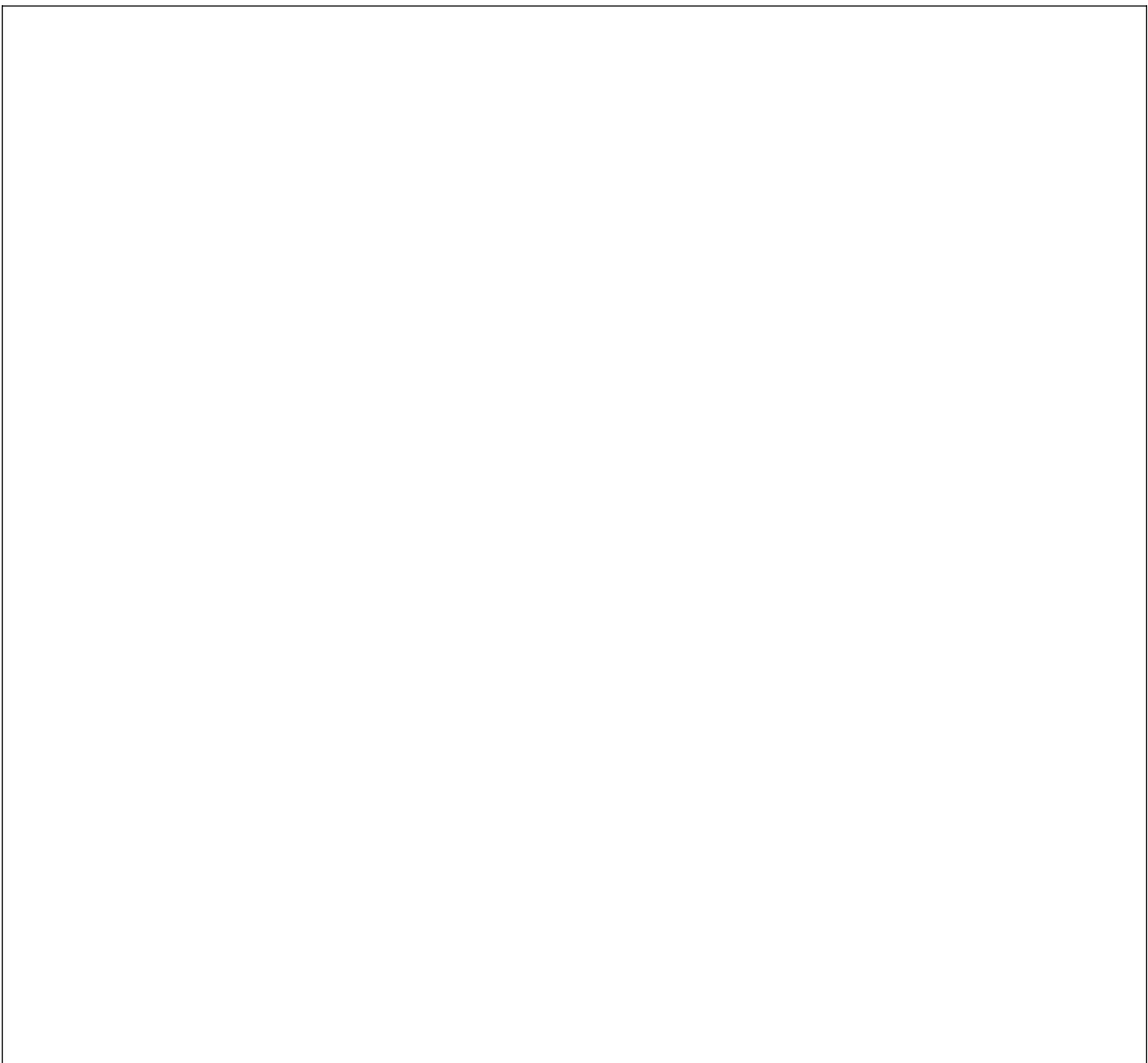


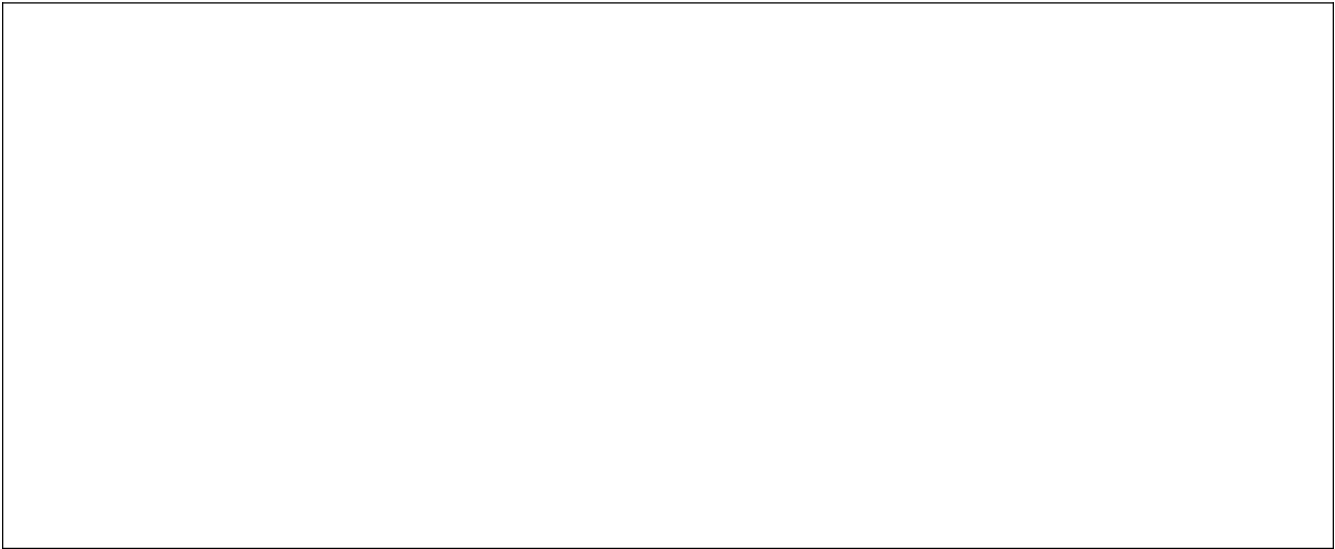


## Questions for feedback – Improving attendance at the initial appointment (Continued)

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

Feedback to Question 6.2





## Questions for feedback – Performance Framework

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

Feedback to Question 7.1





**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

**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

**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

**Questions for feedback – Performance Framework (Continued)**

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

Feedback to Question 7.5

**Questions for feedback – Performance Framework (Continued)**

7.6 How might performance be benchmarked in the new model?

Feedback to Question 7.6

**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

### 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

### 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



### 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

**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

### 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

### 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

### 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

