



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 – Eligibility

3.1 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 3.1

Research shows that disengagement from education and employment is not a one-off event occurring in isolation at the end of schooling. Instead, it is the result of a long-term process that can begin in childhood and continue throughout the course of a young person's schooling and later in life.

There are a complex range of issues that can impact on a young person's ability to engage in the education system and workforce, including homelessness, mental illness, alcohol and other drug dependence, contact with the justice system, experience of domestic and family violence, experience of the child protection system, experience of economic disadvantage (including parental joblessness) and living in remote, regional and rural areas. We recommend that the Department particularly consider the following issues in determining eligibility for TtW.

Homelessness

Eligibility processes need to recognise that homelessness can take a number of forms, and also that young people do not always recognise that they are experiencing homelessness, particularly if they are couch surfing, and may respond to questioning about homelessness in different ways.

We therefore recommend incorporating a more detailed assessment of housing status into the JSCI to better capture the types of homelessness experienced by young people. We also recommend co-designing this assessment with young people with lived experience, to ensure that it uses language that young people can recognise and respond to.

Mental health issues

The Productivity Commission Report into Mental Health recommended that consideration should be given to incorporating a mental health diagnostic instrument to assessment tools (such as the JSCI), and supplementing the Employment Services Assessment (ESAt) with a personal and social performance measure. We agree with this recommendation, on the proviso that a) evidence-based, youth-specific and culturally-appropriate assessment tools are used and b) staff members are adequately trained to administer it.

Questions for feedback – Maximum duration of service

4.1 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 4.1

In our experience, an accurate assessment of a young person's vocational and non-vocational barriers requires young people to feel safe and well. We believe that the decision as to whether a young people requires 18 or 24 months of servicing should be made only after the provider and the young person have had the opportunity to establish trust, and the young person's most urgent and emergent needs have been addressed.

We also recognise that changes to circumstances and relationships over the service period will inevitably alter assessments of a young person's barriers and opportunities. It is important for services to accommodate young people through their journey at their own pace, recognising the variations in the transitions which young people undertake.

Questions for feedback – Maximum duration of service (Continued)

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

Feedback to Question 4.2

25 hours of employment and education activity is not always suitable for young people with complex non-vocational barriers. We recommend that providers be allowed some discretion on decision-making around the number of activity hours it is possible for individual young people to engage in, where complex non-vocational barriers are a factor. It would also be helpful for providers to be able to include non-vocational activities, if more appropriate in the short-term, including counselling, health and fitness classes and so on for young people who could benefit from these activities.

Questions for feedback – Maximum duration of service (Continued)

4.3 What circumstances should determine whether a young person is transferred to online services or to an Enhanced Services Provider at the end of their service period in Transition to Work?

Feedback to Question 4.3

We believe that the young person should make the decision of whether they are transferred to online services or to an Enhanced Services provider as part of exit planning processes.

Exit planning helps a client to prepare to maintain their progress without intensive support from TTW, and embeds independence and empowerment at the core of service delivery. We discuss exit planning at the interim assessment and review stages with TTW participants in the context of recognising when the young person achieves (or makes significant progress towards) their goals, or as they approach the end of the available support timeframe.

Service exit planning commonly includes practical preparation for independence; emotional or psychological preparation for cessation of service and TTW support; establishing links to long-term or ongoing services; obtaining relevant resources to maximise independence; and identifying and mobilising ongoing personal support networks. Celebration is at the core of exit planning, and exit is seen as a 'graduation' and progress towards independence, rather than an ending of support.

Questions for feedback – Improving attendance at the Initial Appointment

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

Feedback to Question 5.1

As the recent TtW evaluation demonstrated, TtW results in positive outcomes for and strong engagement with young people who are eligible for the program. We believe that, in general, eligible young people are better supported through TtW than through Jobactive.

Our staff members report difficulty in engaging some young people in their first appointment with TtW, although once young people have commenced with the service there is a high degree of engagement. In our experience, those who take longer to engage are generally affected by non-vocational barriers including homelessness. Incentive to commence in TtW will ultimately benefit these young people who may otherwise be referred to Jobactive where they will be subject to a strict compliance regime and provided with fewer tailored supports.

We therefore support a mechanism to encourage TtW participants to attend their first appointment. However, we do not support an immediate suspension of payments as the consequence. A warning system, providing our staff with the ability to contact the individual and establish engagement, and the ability for Rapid Connect to quickly re-instate payments, would be preferred. This relies on providers being given the correct contact details for young people. An automated text reminder to young people is another possible approach. We hold a strong position that the Targeted Compliance Framework should never be applied to TtW and that no further compliance mechanisms should be applied to participants once they have commenced in the program.

Questions for feedback – Improving attendance at the Initial Appointment (Continued)

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

Feedback to Question 5.2

See response to 5.1.

Questions for feedback – Improving attendance at the Initial Appointment (Continued)

5.3 What issues, if any, do you see with making attendance at the first appointment subject to the income support payment suspension mechanism?

Feedback to Question 5.3

See response to 5.1.

Questions for feedback – Performance Management Framework

6.1 What elements should the department use to measure achievement of Education Outcomes?

Feedback to Question 6.1

██████████ would like Certificate 1 and 2 level qualifications and skill sets included as Education Outcomes because these qualifications are more relevant and transferable for the TtW cohort. Cert 1 and 2 level qualifications build language, literacy, numeracy and soft skills in industry-specific areas, but these units are not included in Cert 3 qualifications. Because the training is more relevant to what the young person is interested in, they are more interested in participating in training (and TtW) and more engaged in the process.

In our experience, employers prefer an employer-driven education model and they are not specifically looking for a Cert 3 qualification. Relevant Cert 1 and 2 qualifications that build an identified skill set through foundation skills units can prepare young people for the workplace without affecting the employer's ability to shape the training pathways of their employees. Employer-targeted short courses, such as the Cert 1 in Engineering in partnership with the ADF, or purpose-developed, targeted skill sets are more likely to lead to real employment pathways. Compounding this, subsidised training is generally only available for the first Cert 3 qualification, so if a young person completes a Cert 3 qualification but then wants to work in a different field, they (and their employer) are unable to access further financial support.

More broadly, a Cert 1 or 2 qualification or skill set are also more achievable for TtW participants who can generally cope with the required time commitments. Asking a young person who has disengaged from education to commit to a 6-month course can be challenging and it may not align with their goals and needs. We are concerned that the continued focus on Cert 3 attainment may lead to some young people being guided away from foundation skill development in favour of attaining a Cert 3 Education Outcome.

Questions for feedback – Performance Management Framework (Continued)

6.2 How should the department seek to ensure job seekers and employers are receiving quality of service from Transition to Work Providers?

Feedback to Question 6.2

We recommend that the Department implement a minimum training benchmark for staff working with young people, including training in cultural awareness, mental health and motivational interviewing.

Questions for feedback – Performance Management Framework (Continued)

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

Feedback to Question 6.3

Questions for feedback – Performance Management Framework (Continued)

6.4 What factors should the department account for when determining Funded Places?

Feedback to Question 6.4

Questions for feedback – Performance Management Framework (Continued)

6.5 How should performance be benchmarked in the new model?

Feedback to Question 6.5

We agree with the proposal to de-link Outcome Targets from provider payments in the new model.

Question for feedback – Youth Advisory Sessions

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

Feedback to Question 7.1

Questions for feedback – Other Policies

8.1 Do you think the Transition to Work program settings have the right balance to ensure national service standards, while also allowing Providers the flexibility needed to enable local collaboration and engagement in their communities?

Feedback to Question 8.1

Enabling local collaboration and engagement in communities should be part of the core work of Transition to Work and is key part of achieving improved outcomes for young people.

While collaboration and working alongside young people and the community is at the heart of our TtW approach, the value and time that this linkage takes needs to be reflected in performance indicators so that this work can be recognised. This may include mapping and reporting a TtW Provider's community engagement and collaboration, and balancing outcome indicators with the work done to improve engagement and collaboration.

We are currently successfully running a Community Investment Committee (CIC) in the [REDACTED] region, in partnership with the [REDACTED]. The place-based mechanism of CICs should be a core part of the TtW model, and TtW providers should be mandated to develop and coordinate CICs, enabled by the National Youth Employment Body.

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:

- ñ Increased collaboration with employment and support services, employers, government and training providers to co-design local training and employment pathways
- ñ Improved understanding of and engagement with local growth industry sectors
- ñ 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
- ñ Increased connection and exchange of local and national knowledge, including participation in the Local Jobs and Skills Taskforce
- ñ Increased local and national understanding of the barriers and enablers to quality youth employment and the implications of this for local economic development
- ñ Increased community willingness to build relationships with providers and invest in the capabilities of young people.

Questions for feedback – Other Policies (Continued)

8.2 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 8.2

We strongly support the engagement of young people in the design and delivery of Transition to Work and agree with the rationale set out in the Consultation Paper. We have seen firsthand that the engagement of young people in service and policy design has benefits not only for services but also for young people themselves, and at the appropriate stage of their engagement with a service can be an important part of their transition and an opportunity to share their story and 'give back'.

To the information set out in the Consultation Paper, we would add that meaningful participation is a process, not a one-off activity, which requires the development of a relationship founded in trust and respect; it also requires ensuring that young people's views and experiences actually influence change (Kirby et. al., 2003). In the post-COVID context, engaging young people has become even more critical. Young people in our services have told us that the significant economic and social changes that have been brought about by the pandemic have strongly influenced their preferred interaction with institutions, including community service providers. Any service that does not explore these changes and take them into account risks becoming irrelevant.

The specific mechanisms that we encourage our services to use are set out in our [Framework for Client Participation](#). As outlined in the Framework, each of these has benefits and drawbacks, and the timing of implementation of any one of these is critical to consider. These are placed along the International Association for Public Participation (IAP2)'s Spectrum of Public Participation and include:

- ñ **Seeking participant feedback** and involvement in **strategic and business planning** through methods including focus groups, surveys, individual or group interviews, and suggestion boxes.
- ñ Involving program participants in **staff recruitment**, which can bring a new perspective on what is needed from staff. The opportunity to participate in the process with hiring managers can also build clients' confidence and enable meaningful user input into service delivery.
- ñ Establishing **Client Advisory Councils or Reference Groups**. These are beneficial for both services and clients because they can improve client/staff relationships, improve skills and self-confidence for clients and increase client input into the design and delivery of services and broader advocacy issues.
- ñ Recruiting **Lived Expertise Practitioners**, who are able to bring the unique skills and knowledge gained through lived experience and engagement with support services.
- ñ Involving program participants in service design through **co-design processes**. Involving individuals with lived experience to participate in the design of services ensures that these resulting services best meets the needs of the people that will be using them.
- ñ **Engaging with the broader community**, not just direct program participants, in community conversations, workshops and forums to bring greater diversity of views and experiences that can help us to learn about the context of TtW within the community and wider systems that support clients.
- ñ Involving participants in **advocacy, research and social policy processes**. Engaging clients in media opportunities, sharing their personal stories with the public, or through Parliamentary inquiries helps to raise awareness of issues facing clients.

We also direct the Department's attention to the work of the [Y-Change](#) platform, established by Berry Street. The Y-Change platform seeks to 'move beyond giving voice to young people and towards supporting them to access decision-making power'.

We also note that engagement, consultation, co-design and the recruitment of lived expertise practitioners

are processes that need to be adequately resourced. Staff training, time and resources to undertake this work need to be built in as part of the contract and service design.

Questions for feedback – Other Policies (Continued)

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

Feedback to Question 8.3

As noted in our response to 4.2, 25 hours of employment and education activity is not always suitable for young people with complex non-vocational barriers. A stepped approach to activity can be more successful in engaging young people in TtW and ultimately lead to better educational and employment outcomes.

We also note here our response to 5.1, that any mutual obligations approach should be limited to incentivising young people to attend their first appointment. After that, the focus of the program should be on strong engagement with young people and collaboration with the community. We reiterate our position that the Targeted Compliance Framework should never be applied to TtW and that no further compliance mechanisms should be applied to participants once they have commenced in the program.

Questions for feedback – Other Policies (Continued)

8.4 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 8.4

Understanding and responding to the episodic nature of mental illness is central to best practice in supporting mental health of participants in employment services. Enabling TtW participants who experience episodic mental illness to flexibly transition on and off income support as their functional capacity changes would mean that young people can continue to participate in study or work (and gain the benefits of social and economic inclusion), without risking losing their income support payments or otherwise disincentivising employment.

Further responses are addressed under 8.6 below.

Questions for feedback – Other Policies (Continued)

8.5 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 8.5

We believe that all TtW staff require a fundamental level of training in supporting young people with their mental health and wellbeing. The Productivity Commission Report into Mental Health (2020) highlighted the role of social inclusion as a supporting factor to psychosocial supports. There is an opportunity for TtW to support social inclusion by developing opportunities for peer and social support (including families where appropriate) in partnership with young people, especially in regions with limited access to specialist services.

Supporting young people who are experiencing longer waitlists for specialist services requires collaboration and flexibility, and ongoing communication with both participants and the providers of specialist services. An active holding process, consisting of regular contact and monitoring of the young person's circumstances and linkage with any other supports available in the community, combined with follow-up with service providers can support the young person until they can access specialist services. In our experience, addressing the young person's whole-of-life needs can contribute to an improvement in mental health, and support the work of specialist mental health services. We also promote links to online and telephone-based supports where appropriate.

Questions for feedback – Other Policies (Continued)

8.6 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 8.6

Firstly, it is vital to note that the mental health of Aboriginal and Torres Strait Islander young people must be viewed in a broader context of social and emotional wellbeing. Social and emotional wellbeing is holistic and deep-rooted in Aboriginal and Torres Strait Islander community. It is a multi-dimensional concept of health that encompasses connection to body, mind and emotions, connection to family, kinships and community, and connection to spirituality, land and culture (Gee et. al. 2014). This must be taken into account when considering mental health responses within the TtW program.

More generally, it will be critical to engage young people in the development of appropriate responses to mental health within the TtW program. Young people in our services have told us that the language used to describe mental health supports or services, and how the service aims are communicated, can be a critical factor in either heightening or reducing their feelings of stigma and embarrassment. Using language that is understood by young people, and recruiting staff with lived expertise, can significantly influence young people's willingness and capacity to engage with services.

Conversations with young people in our services have revealed that they do not always understand that they are experiencing mental health issues, or may use the language of 'problems' to be solved rather than 'mental health needs' to be addressed. In many cases, it also takes time for young people to establish relationships of trust and respect with service providers, to the extent where they can talk more openly about the issues they are facing or the way they are feeling.

Apart from specialist youth mental health services, some staff members in youth services are not properly equipped with the necessary skills, training or confidence to recognise and act upon a client's mental health issues. Developing the skills of the existing workforce, to be able to recognise mental health issues and either support or refer young people appropriately will be important to consider.

The physical environment of a service is another critical element to consider in the TtW service offer. Clinical or bureaucratic environments can trigger anxiety and stress in young people, and creating a space that feels informal and welcoming can significantly assist in de-escalating young people's experience of stress in the service environment.

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

