

The Department of Education, Skills and Employment

Exposure Draft for the New Employment Services Model 2022
Purchasing Arrangements

Response submitted by:

The National Disability Coordination Officer Program



National Disability Coordination Officer Program
AN AUSTRALIAN GOVERNMENT INITIATIVE

Thoughts on Exposure Draft for the New Employment Services Model 2022 Purchasing Arrangements

Maximising the potential of people with disability in the workforce.

Summary

This submission provides our thoughts on the Exposure Draft for the New Employment Services Model 2022 Purchasing Arrangements as well as our professional recommendations to improve transition of people with disability, specifically those who will be accessing Jobactive in the new contract period, into appropriate, meaningful and sustainable employment.

This submission has been prepared by [REDACTED] [REDACTED] [REDACTED] [REDACTED] and [REDACTED] who are employed as National Disability Coordination Officers. The NDCO Program is an Australian Government initiative which aims to drive change so that people with disability have equitable opportunity to access, participate and achieve their goals in tertiary education and subsequent employment. The views presented in this submission do not necessarily reflect the views of the Australian Government.

Introduction

People with disability represent a rapidly growing cohort of graduates across Australian Universities, TAFE, and other VET providers, and are emerging as capable talent - ready to begin their careers. However, these individuals are not attaining qualification related work on an equal basis as peers without disability.

As the Australian labour market sees a growing vacuum of entry level jobs¹ . It is now more critical than ever that disability employment policy and programs are strengthened to ensure that people with disability have equal access to opportunities that fully build, enable, and utilise their education and skills at all levels.

The Australian workforce and wider community will be best served by providing people with disability, and more vulnerable job seekers, with the resources and supports necessary to ensure that they are able to meet their full potential as workers. It is crucial that all members of employment support services raise their expectations for workers with disability. This can be achieved by providing appropriate and timely employment supports, aimed at assisting job seekers to obtain employment in line with their career aspirations, allowing for full utilisation of their prior training and educational qualifications. In this way, employment outcomes which are achieved are more likely to be sustainable, resulting in long term employment and improved whole-of-life outcomes for job seekers.

Aligning with this is the need for the Department to raise the level of expertise of employment services staff. In short, the lack of experience, professional identity and incentives, which would maintain staff morale at grassroots level, results in poor employment service performance overall.

Below you will see a list of our thoughts, grouped into common themes, as well as a link back to the relevant page and document for your reference:

Theme	Document Name	Page Number
Initial Assessment:		
<i>The new model will deliver a simple, efficient, trusted and connected service, where job-ready job seekers can self-manage through Digital Services.</i> - Certainly, it can take some time to establish the issues, barriers and areas of concern which hinder the success of a job seeker. We are concerned that the anonymity of digital servicing might mean that some job seekers do not receive the range of support which would facilitate successful employment outcomes.	Exposure Draft for the new Employment Services Model 2022 Purchasing Arrangements	Page 17

¹ <https://www.anglicare.asn.au/home/2020/10/13/anglicare-australia-launches-jobs-availability-snapshot>

<p><i>A new Job Seeker Assessment Framework (JSAF) will ensure job seekers receive the Services most appropriate for them. The JSAF will be ongoing and dynamic, support job seeker disclosure and engagement, minimise reporting duplication for job seekers, and use data analytics to personalise interventions and support. The initial assessment under the JSAF, will sit in the New Employment Services Gateway (Gateway).</i></p> <p>– The initial assessment phase is complex because it relies on an individual to self-report and to have adequate documentary evidence at hand, and to seek support when required. Without individual face to face services, the most vulnerable job seekers may not possess the skills, knowledge or confidence to request the most appropriate service type for them, based on their support needs.</p> <p><i>The department will consider issuing the following four types of cohort Specialist Licences at the commencement of the new model: • Indigenous Australians • CALD • refugees 30 • ex-offenders.</i></p> <p>– Provisions should be made available for job seekers with disability who are not eligible for other services such as DES.</p> <p><i>1.5.3 Direct registration - Some individuals will be able to access employment services even if they are not in receipt of income support. Individuals identified as vulnerable youth, pre-release prisoners and Structural Adjustment Package participants (where applicable) will be eligible to access Enhanced Services without the need for a referral from Services Australia.</i></p> <p>- This policy related exclusion of a cohort of people with disability relative to income support, or lack thereof, may create complex issues, including the potential for compounding the youth unemployment gap and compounding disadvantage for people with disability. As an example, individuals with disability who are temporarily financially supported by family will be prohibited from accessing the individualised supports required for them to be competitive in the workforce if this change is not reversed.</p>	<p>Exposure Draft for the new Employment Services Model 2022 Purchasing Arrangements</p> <p>Exposure Draft for the new Employment Services Model 2022 Purchasing Arrangements</p> <p>Appendix 1</p>	<p>Page 22</p> <p>Pages 29 & 30</p> <p>Page 7</p>
<p>Digital Employment Services Platform:</p>		
<p><i>Digital Services will be the default support for job-ready job seekers who will self-manage their pathway back to employment. Employers will also be able to use the Digital Employment Services Platform to find suitable candidates for their vacancies.</i></p>	<p>Exposure Draft for the new Employment Services Model 2022 Purchasing Arrangements</p>	<p>Pages 7 & 8</p>

<p>- This will need to be carefully managed to ensure job seekers with disability are not detrimentally affected by a move online. Additionally, there will be job seekers without access to reliable internet or computers/ devices, who may also reside in rural and remote areas and communities. We caution that a lack of foresight around the issue of little or no access to the internet, or even devices, could mean that culturally diverse populations are indirectly discriminated against in this process.</p> <p><i>The Digital Employment Services Platform will provide employers access to a large pool of job seekers, with the ability to filter and search for candidates at no cost to them, and resources and information to assist with hiring job seekers and workforce planning.</i></p> <p>For this vision to be successful, employers will need to be aware of the platform and how they can best harness its potential to work in their interests from a very early stage.</p> <p><i>Job seekers will be transferred to an Enhanced Service Provider for more tailored assistance after 12 months in Digital Services, unless they are in work, study, training or a work placement.</i></p> <p>– Clarification is required on how long it could take to recognise that a person requires additional support beyond digital servicing.</p> <p>Support through digital platforms is not enough to provide intensive support needed to be competitive in certain job markets. For instance, those which require responses to a range of criteria, or those for more high-level, graduate employment. Education opportunities should be available throughout a person’s job search journey to ensure that they are aware of various support options if their circumstances change, and sufficient prompts and support to navigate the process.</p>	<p>Exposure Draft for the new Employment Services Model 2022 Purchasing Arrangements</p> <p>‘I Want to Work Document’.</p> <p>Exposure Draft for the new Employment Services Model 2022 Purchasing Arrangements</p>	<p>Pages 7 & 8</p> <p>(Page 21 - IWtW)</p> <p>Page 22</p>
<p>Discretion of service providers:</p>		
<p><i>Uses wage subsidies and other available financial tools to secure employment opportunities for job seekers.</i></p> <p>- Wage subsidies are proven to not always incentivise employers to support job seekers and workers in the long term. Employment service providers should work to positively promote to employers how the job seeker/s meet the criteria of the job role/s on offer, rather than placing job seekers into employment by virtue of short-term financial incentive. Flexible funding would allow for a more person-</p>	<p>Appendix 1</p>	<p>Page 6 & Page 18</p>

centred approach to career planning. For example, in some cases, additional funding to help job seekers achieve educational aspirations could result in a more sustainable employment outcome in the long term.

1.6.1 Points Based Activation System All job seekers will use the Points Based Activation System (PBAS) to meet their mutual obligation requirements.

– This leaves much room for job seekers to make errors. People with complex support needs may commit to achieving deadlines or to completing activities that they require a lot of support to do successfully, and they may face financial disruption because of an inability to meet requirements due to their disability.

EST will be available to job seekers in Digital Services of all ages. Enhanced Services Providers can refer job seekers to EST on a fee for service basis, meaning the Provider must pay the fees. Training is 25 hours per week for three weeks. Training Block 1 (\$1250): will focus on advanced job search skills, pre-employment and EST to improve job seekers' prospects of employment. Training Block 2 (\$1500): will focus on industry specific training for 25 hours per week for three weeks.

– The mandate on service providers to pay for training may mean that job seekers are disallowed from participating in some courses or streams of education which truly meet their potential and allow them to aspire to greatness. Sustainable employment outcomes are enabled by aligning employment and training opportunities with job seekers' skills and interests.

Eligible job seekers in locations where Specialist Services are offered will be able to choose to be supported by that Specialist or by a Generalist Provider. In many locations, a Specialist Provider may not be present therefore all Enhanced Services Providers will be required to develop effective servicing strategies to respond to the various needs of the job seekers in their local areas.

- We are concerned that those who live in rural and remote areas continually miss out on the services which can best support them. Evidence shows that keeping people in their local communities generates more sustainable employment outcomes and saves on financial burdens and costs to those communities. Therefore, Specialist Services should be made available locally.

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Roles of employment services staff:

The new employment services model will include a panel of Workforce Specialists to deliver projects to meet the workforce needs of identified key industries and occupations, connecting them to suitable job seekers in Digital Services and Enhanced Services.

– Workforce Specialists will require enhanced skills/ knowledge about key industries to support job seekers and employers within those industries. This includes life experience, cultural connection, maturity, minimum qualifications, experience and skills around servicing specific cohorts (staffing, benchmarking) and prior experience in supporting job seekers with disability, and tertiary graduates.

Research shows that staff turnover within the employment services industry was at an all-time high in 2016, at approximately 42 per cent of staff... The proposed model would seek to improve retention of provider staff and thereby improve the quality of service to job seekers and employers. During consultations, provider representatives have stressed the importance of the industry leading efforts to further improve employment services consultant skills to ensure that they are relevant to the sector's needs.

Indeed, to place a person with disability into appropriate employment takes a skill level that is not currently required or rewarded in the current employment services workforce, resulting in high staff turnover. In short, to retain quality employment consultants and enable high performance (that is, more sustainable employment outcomes), their work must be recognised by appropriate remuneration and professional standing. Licenses should be provided to employment service providers which commit to hiring staff with a minimum level of qualification and standard of performance, and which mandates higher financial and non-financial incentives to their high-performing staff as a reward for this good performance.

1.2 Key features of the new employment services model - job seekers will choose their Provider, receive individually tailored case management.

– Will employment consultants have the skills or time for 'individually tailored case management'? Please clarify what you mean by 'case management', and how you can ensure that employment service providers have the right skill set to offer support to job seekers with complex support needs (or refer to appropriate services).

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Job seekers will need to complete a minimum number of job searches per month as part of meeting their Points Target, tailored to their personal circumstances. The detailed value and approach are to be finalised.

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– There is a difference between the quantity and quality of job search activities. Moreover, some job applications (especially those for high level roles in line with tertiary qualifications, for example, government or graduate roles) may require an extensive application and exhaustive recruitment process. If all job seekers are compelled to focus their efforts on achieving a minimum number of jobs, rather than on those applications which support their career aspirations, they may not be best placed to meet their personal potential. Quality Vs Quantity.

- Statistics show the turnover rate of Employment consultants is very high. Reducing caseload numbers and improving employment services staff skills solves only part of the problem. Under the new contract, employment services staff in Jobactive will be inundated with an influx of vulnerable people, with more complex support needs. This will be especially apparent in regional and remote areas. Having to achieve set targets which in turn converts to financial outcome will be a more difficult task for employment consultants. We recommend a mix amongst the caseload of jobseekers' support needs and career readiness, to enable employment services staff to consistently place people into sustainable employment, and to build upon their own skill set.

Aspiration building supporting job seekers:

1.3.1 Key features of Enhanced Services Enhanced Services, including those delivered by Specialist Providers...will be available to job seekers needing more support to move into employment, as well as eligible job seekers choosing to move from Digital to Enhanced Services.

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– There are a range of enhanced support options here, but no specific mention of tertiary pathways to help job seekers to prepare for high level roles. This should be an option made available to job seekers as a standard offering, so that they can be competitive in certain job markets, and to raise aspiration amongst those seeking employment support. The focus should be on sustainable employment, which is better assured when job seekers are encouraged in employment settings which are in line with their skills, interests and career aspirations.

Respondents will be able to reuse and edit responses to allow adjusting of similar responses to different ERs and/or Services. Areas of capability being considered include but are not limited to...

- Providers should also be asked to provide a tender submission to demonstrate how effectively they place job seekers in line with their area of qualifications, or in supporting employees to advance in their careers, and on their established relationships and connections with local tertiary education providers.

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General Thoughts

The information about the various types of employment services was difficult to find and rationalise, with information about how each part of the model works in different parts of the Exposure Draft and appendices. It would be beneficial to include a table or flowchart to illustrate for certain how each part of the services model will work, and how individuals would move from one support service to the next.

The Youth Advisory Sessions helps young people aged 15-24, in online and digital employment services to maintain their work readiness and/or motivation to find employment. Young people can get up to 3 free, one-hour advisory sessions with a specialist youth consultant.

- From experience, the needs of young people with or without disability can be complex and multifaceted. How are three, one-hour sessions going to be enough to address the multitude of needs?

Providers are expected to work with local community organisations, training institutions and employers to identify a diverse range of activities that will support individual employment pathways for the job seekers on their caseload. They will work with job seekers to select suitable employment related tasks and activities.

- We are concerned with the wording of this section. jobseekers should be empowered to direct their own job search activities, giving them a voice and control over their career trajectory.

1.12.2 Sustained employment module the objective of this module is to assess Provider performance in achieving sustained employment for job seekers.

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- We would like to reiterate that by supporting job seekers to utilise their skills and qualifications and achieve their maximum potential, those jobseekers are more likely to become engaged in sustained employment outcomes.

27 per cent of all job seekers in employment services have a disability. But they only make up 15 percent of job seekers who stay in employment for 26 weeks or more. Many job seekers with a disability are not getting the support they need to find and stay in work.

- The stats prove the number of people with disability do not match up with the number of people who can sustain their work upon securing employment. The evidence highlights a significant gap for people with disabilities. The DSCC team must be able to flag people with disability and for people who are eligible for Digital Servicing to be given a choice of Enhanced Servicing from the start. This would minimise the fallout of people with disabilities who require a more personalised approach to employment services.

We are interested in hearing more about how the National Disability Employment Advisory Committee strategy and how the NDIS employment strategy intersects with the Exposure Draft for the New Employment Services Model 2022.

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We thank you for your time in receiving our response and would welcome the opportunity to discuss this with you further,

Yours Sincerely

The NDCO Team