The Department of Education, Skills and Employment

Exposure Draft for the New Employment Services Model 2022 Purchasing Arrangements

Response submitted by:

National Disability Services



Submission in response to the Exposure Draft for New Employment Services Model 2022 Purchasing Arrangements

NDS welcomes this opportunity to respond to the Exposure Draft for New Employment Services Model 2022 Purchasing Arrangements. Unless otherwise noted in this submission, NDS agrees with the proposed Purchasing Arrangements for NESM as identified in the Exposure Draft.

Recommendations:

Having considered the Exposure Draft, NDS recommends the following:

- DES should retain its role as a complementary disability specific program providing ongoing support for people with high needs to gain and maintain employment and remain separate from the proposed NESM
- Where a jobseeker with disability in one of the marginalised cohorts can access a specialist DES provider or a Specialist Enhanced Service that the DES provider should be the preferred option
- Specialist Enhanced Services should be able to demonstrate a successful outcome rate for their specialist cohort and that they have a strong connection to the other community services in the region(s) they are seeking a license
- Where a newly licensed provider has not achieved the requisite ISO/RFFR IT security and quality accreditation that they be allowed sufficient time to do so

Observations on the proposed NESM purchasing arrangements:

The exposure draft includes an indicative timeline identifying key elements in the rollout of the NESM purchasing arrangements.

- The Request for Proposal (RFP) is expected to be released in early September 2021
- Notification of the RFP outcomes including panel membership and license offers is expected in February 2022
- Issuing of Deeds and the commencement of transition will occur in March 2022, with the delivery of NESM commencing 1 July 2022

The Exposure Draft identifies which services will not be included in the NESM purchasing arrangements. These services include enhanced Employability Skills Training, Career Transition Assistance, Transition to Work and New Business Assistance with NEIS and will complement the NESM.

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NDS supports the decision to cap licences in each employment region to ensure market stability. The decision to increase the number of providers in Employment Services Regions (ESAs) in the DES program from mid 2018 has not produced the results intended and led to market saturation and service provider license revocations.

The commencement of the NESM will have profound implications for the ongoing provision of Disability Employment Services (DES) and the design of the new DES model due to commence in mid-2023.

Specialist Enhanced Services will assist specific marginalised job seeker cohorts including Indigenous, culturally, and linguistically diverse, refugee and ex-offender job seekers. Consequently, the purchasing arrangements for NESM and Specialist Enhanced Services have excluded people with disability until the review of DES is finished and a new model designed for the contract from mid 2023.

The most significant potential impact on DES is for those participants who are also in the marginalised cohorts in NESM. These participants currently constitute up to 46% of the current DES caseload. NDS notes that the Indicative Enhanced Services Caseload data in the exposure draft includes people with disability.

NDS recommends that where a jobseeker with disability in one of the marginalised cohorts can access a specialist DES provider or a Specialist Enhanced Service that the DES provider should be the preferred option.

NDS recommends that Specialist Enhanced Services should be able to demonstrate a successful outcome rate for their specialist cohort and that they have a strong connection to the other community services in the region(s) they are seeking a license.

The Exposure Draft states that a person with disability will continue to be supported either through Digital or Enhanced Services or by the DES program and that Digital Services will also be available to job seekers in DES.

A new Job Seeker Assessment Framework (JSAF) is identified in the Exposure Draft, which notes the initial assessment under the JSAF will sit in the NESM (Gateway). The Job Seeker Classification Instrument (JSCI) will remain a core component of the initial assessment under the JSAF.

The initial assessment will also review a jobseeker's suitability for Digital Services or Enhanced Services and identify:

- Those that may need further assessment through an Employment Services Assessment (ESAt),
- Job seekers that may be better serviced in complementary programs such as Transition to Work.

DES is identified in the Exposure Draft as a complementary program. It is essential that the ESAt continues to direct jobseekers with significant non-vocational barriers

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to employment such as a severe disability to DES, where they can receive the appropriate supports to assist them gain and maintain employment.

Under the NESM Points Based Activation System, service providers will not have to police a participant's mutual obligation requirements as they do under the current Jobactive model. This is a positive feature of the proposed NESM and will allow providers and participants to work collaboratively, while ensuring the mutual obligation policing function is the responsibility of Services Australia.

The Exposure Draft notes that if offered a licence, providers will be required to attain accreditation of their Information and Communications Technology (ICT) systems.

DESE will work with providers to ensure they are able to meet a customised ISO 27001 certification standard (Right Fit For Risk - RFFR), a whole of business approach to IT security. A Capacity Building Fund will assist entrants to prepare for and establish themselves under the new model, including some of the costs associated with obtaining the required IT security and quality accreditation.

NDS recommends that where a newly licensed provider has not achieved the requisite ISO/RFFR IT security and quality accreditation that they be allowed sufficient time to do so.

NDS strongly recommends that DES retains its role as a disability specific employment program that remains separate from the NESM. DES should also retain its ability to provide ongoing support for people with high needs to gain and maintain employment. The NESM is not able to offer this type of support.

NDS will continue to engage with members as to how the NESM, Transition to Work and DES can best interact to ensure that people with disability are able to access employment services that suit their needs and career aspirations and enable them to gain and maintain employment.

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National Disability Services is the peak industry body for non-

government disability services. It represents service providers across Australia in their work to deliver high-quality supports and life opportunities for people with

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disability. Its Australia-wide membership includes over 1,150 non-government organisations which support people with all forms of disability. Its members collectively provide the full range of disability services — from accommodation support, respite and therapy to community access and employment. NDS provides information and networking opportunities to its members and policy advice to State, Territory and Federal governments.