

**To The Hon Brendon O'Connor MP**  
**Minister for Employment Participation**

Dear Minister,

Thank you for your invitation for contributions to the improvement of employment services. As a capped Disability Employment Network operating in Hobart, we appreciate the opportunity to put forward suggestions from our 10 years experience of operations as a Disability Employment Service.

When responsibility for Disability Employment moved from FACSIA to DEWR, we looked forward to a stronger focus on employment and accountability. However the shift in focus was not adequately tailored to the unique nature of Disability Employment.

The 'one size fits all' model applied to Job Networks and DEN's alike has not worked. We therefore congratulate the Government's Social Inclusion and Skills Policy. Some of the key aims outlined in your letter provide hope of re-addressing the balance.

We would like to contribute the following account of the main areas that we feel need to be improved:

**DSP Review**

***Issue 1***

***Current***

A job capacity assessment towards a placement in a DEN service will trigger an automatic review of DSP recipients DSP Status.

***Result***

DEN's across Australia have experienced a marked reduction in capacity (see below). Un-referred 'walk-ins' interested in registering with our service have expressed fear and reluctance at the prospecting of losing their DSP status.

***Fewer DSP recipients seek employment assistance***

*Figures released following a Senate Estimates hearing appear to confirm that a change to program procedures (which DEWR published in December 2006) is deterring people on DSP from volunteering for work.*

*DSP recipients without a current review (meaning that they have not been reviewed during the last two years) will have their DSP eligibility automatically reviewed if they undergo a job capacity assessment. The prospect of losing their DSP with no guarantee of employment is a disincentive to seeking employment assistance.*

*The figures show a significant drop in DSP commencements across DEN, Job Network, PSP and Vocational Rehabilitation Services since December 2006. In the three months up to and including November 2006 an average of 1120 DSP recipients a month commenced with a DEN provider. This fell to an average of 742 over*

*the following three months (December 2006 to February 2007). The trend is repeated across all the DEWR-funded services listed above.*

*The figures also reveal that more DSP recipients commenced in a Job Network service than a DEN service (976 compared to 738 in February 2007). In part this reflects the lack of available places across the DEN capped program.*

Source – NDS Newsletter 25<sup>th</sup> July 2008.

#### *Obstacle to Aims*

- *Early interventions minimise the number of long-term welfare dependent Australians of working age (Including a review of the Job Seeker Classification Instrument).*
- *Job Seekers with higher levels of disadvantage receive intensive assistance*

#### *Suggestion*

Have the Policy reversed.

#### **Issue 2**

#### *Current*

A person's eligibility for the DSP is reviewed through trigger events or every 2 years. The JCA's program recommendation can be appealed within 28 days only. The participant is not always clear of the implications of the recommendation. If the Job Seeker is already engaged in a Disability Employment Network, The DEN is not informed.

#### *Result*

We have recently been advised to exit 2 participants immediately. Each had their DSP reviewed last year. Although they were both registered with us at the time, they were each referred to a different service: Both participants were shocked and unhappy with the decision. We had not been informed of the decision at the time. Each participant had made excellent progress toward work, including 1x4 week employment milestone. Both Men have mental health issues, the prospect of yet another assessment, given delays and uncertainties, was extremely daunting. JCA, Centrelink and DEEWR were unable to override the system.

#### *Obstacle to Aims*

- *Employment services are relevant to the circumstances and needs of the job seeker*

#### *Suggestion*

If the system worked as it was supposed to, this situation would not arise. Given its short-fallings, it needs to either undergo major changes or at least allow capacity to override. If not, bureaucracy would have overtaken objectives

## **JCA Referrals**

### *Current*

In the past 18 months we have only been able to accept 30% of JCA referrals. We do not reject potential participants lightly. Reasons have included 'already happily registered with another DEN'.

### *Result*

This is demoralising for the individual concerned and a waste of time for all involved.

### *Obstacle to Aims*

- *Employment services are relevant to the circumstances and needs of the job seeker*
- *The minimisation of time and money spent on administration*

### *Suggestion*

More training for JCA's.

Reduce the complexity of the streams : Make all DEN's uncapped, Automatic eligibility to DEN's for all DSP recipients wanting to work (Without review of DSP Status).

Re-instate a dedicated Centrelink Disability officer for all Disability referrals.

## **Entry Process**

### *Current*

For people who approach us with interest in registering, (Walk-in), who have not been referred by a JCA, they are faced with a very involved and daunting process. The person needs to meet with Centrelink (Sometimes more than once), they need a treating doctor's report and then a JCA interview before returning.

### *Result*

Our last 'Walk-in' took over 2 months to be referred back to us. This involved several calls from the distressed job seeker and subsequent involvement from us to progress the process.

### *Obstacle to Aims*

- *Early interventions minimise the number of long-term welfare dependent Australians of working age (Including a review of the Job Seeker Classification Instrument).*

- *Job Seekers with higher levels of disadvantage receive intensive assistance*
- *The minimisation of time and money spent on administration*

#### *Suggestion*

Automatic eligibility to DEN's for all DSP Recipients wanting to work (Without review of DSP Status)

Reinstate a dedicated Centrelink Disability Liason Officer.

### **Job Seeker Accounts**

#### *Current*

Unlike Job Networks, DEN's are not able to access funds through the JSKA System. This is currently justified by the argument that DEN's receive additional funding for client support instead. This is the same as saying "If you don't need support for your disability to get a job, then you can access this privilege". This is discriminatory.

#### *Obstacle to Aims*

- *Employment services are relevant to the circumstances and needs of the job seeker*
- *Job Seekers with higher levels of disadvantage receive intensive assistance*

#### *Suggestion*

Make the JSKA equally accessible to all job seekers without risk of compromising essential support

### **Star Ratings**

#### *Current*

Thirty percent of the star ratings KPI for each DEN participant in Employment Maintenance is based on "employment hours and wage same or better".

#### *Result*

DEN Providers are penalised by 30% for each participant who does not achieve this, involving participants who:

- Have progressed from a casual basis of employment to permanent (Receiving approx. 20% less take home pay in lieu of holiday and sick leave entitlements)
- Have a degenerative condition and are no longer able to work the same amount of hours
- Have a degenerative condition and are no longer able to work at the same level of productivity on the supported wage system (Lower wages).

- Have a mental health issue and experience periodic phases of withdrawal from work

#### *Obstacle to Aims*

- *Performance management principles (Including star ratings and business reallocation) That support sustainable outcomes and promote quality service delivery*

#### *Suggestion*

Remove this KPI.

### **DMI Re-assessments**

#### *Current*

DEN providers are required to complete a DMI re-assessment for each Employment Maintenance participant every 12 months this takes over 2 hours per participant. At the same time, if a worker's circumstances change, there is again the option to complete a DMI re-assessment

#### *Result*

Each year we spend over 70 hours completing DMI re-assessments and we are a relatively small provider

#### *Obstacle to Aims*

- *The minimisation of time and money spent on administration*

#### *Suggestion*

DMI re-assessments to be completed every 2 years. Continue with the additional option of re-assessment if circumstances change; AND/OR DEN providers to receive a fee for re-assessments.

### **Government Employment**

#### *Current*

The individualised approach to placing people with disabilities into employment that distinguishes DEN's from other provider's, relies heavily on reverse marketing and job carving. The inability to speak directly with a manager or HR manager who is receptive to negotiating a position is an obstruction to this process. This is the case with a system of exclusive online applications and/or strictly merit based recruiting. In our experience, both State & Federal Government Departments are more inclined to adopt a non-negotiable merit based system than other employers.

## Result

Under the Howard Government, 'DEWR' set a very poor example of employment of people with disabilities to not only other Government departments, but to all employers nationwide:

### ***"Disability Employment Falls Further in the Public Service***

*The employment of people with disability in the Australian Public Service (APS) continues to decline, despite a report in 2006 which committed government agencies to reversing this trend.*

*The APS employs 155,000 people. At June 2007, employees with disability represented 3.3% of staff, down from 3.6% the preceding year. The proportion of people with disability has fallen in eight of the past 10 years.*

*Performance across government agencies is variable. As revealed in the APS Commission's State of the Service 2006-07, FaCSIA and Centrelink achieve employment rates well above the average. On the other hand, DEWR - the department with lead responsibility for increasing the general employment rate of people with disability - was below average, with fewer than 3% of its employees having a disability. "*

Source – NDS Newsletter 17<sup>th</sup> January 2008.

## Obstacle to Aim

*"All Australians need to be economically and socially included and that one of the key ways this can be achieved is through jobs".*

## Suggestion

Set an example within DEEWR of a high rate of employment of people with a disability.

Thank you again for the opportunity to contribute. We are very excited about the potential for improvement and look forward to a more socially inclusive nation.

Yours Sincerely

Kate Stevens  
Employment Manager  
BlueLine Employment