



CASTLE PERSONNEL SERVICES INC

**The Hon Brendan O'Connor MP
Minister for Employment Participation
Parliament House
CANBERRA 2600**

Dear Minister O'Connor,

It is with sincere pleasure and appreciation that Castle Personnel Services Inc provides this response to your invitation to comment on "how employment services can be improved".

Castle Personnel Services Inc has, over the past sixteen years, established itself as one of the nation's largest DEN Capped programme providers and providers of DEN Uncapped program across the Hunter, Lower Hunter and Upper Hunter regions of NSW.

In 2006 and 2007 Castle successfully nominated Hunter New England Area Health Services for the prestigious Prime Ministers Employer of the Year Award in recognition of their proactive employment and support of people with a disability. Castle Personnel provide services to clients across seven local government areas. Castle has established relationships with most of these Councils and other state and federal government departments in our service region. Castle's assistance to these departments has included providing disability awareness training to staff and consultation for the drafting and implementation of organisational disability action plans.

Castle Personnel congratulates Hunter New England Area Health Services for taking the lead in their contribution to the employment of people with a disability within their organisation. It is unfortunate that the majority of government departments have failed to set similar examples for the private sector. Castle is confident that under the leadership of the labour government all

departments will be encouraged to participate in the employment of people with a disability.

The following are issues that Castle Personnel believe need addressing to ensure agencies can focus on their core business of assisting and supporting people with a disability to secure career opportunities in open employment.

Yours faithfully,

**Chris Lewis
GENERAL MANAGER**

12th February, 2008

Outcome recognition for Vocational Education and Training for DEN Jobseekers

- **Currently DEN providers are not recognized for vocational education and NEIS training outcomes of clients. This does not encourage agencies to assist clients improve their vocational and educational abilities and discriminates DEN against other Jobnetwork providers who are recognised for these achievements. Government Studies identify that people with disabilities are under represented in education and training and increased participation would boost their employment and career prospects and help alleviate Australia's skills shortage.**
- **Access to Government funded Skills Vouchers needs to be made accessible to DEN clients under the age of 25 years. Year 11-12 Students have school based training, there is a Vocational Education and Training void for 16-25 year olds who have not reached year 10 or undertaken training to certificate 2. These young people should be able to access training opportunities to upskill much earlier than age 25 to ensure marketability to employers.**

Indigenous Jobseekers

- **“The indigenous placement fee” is not available to DEN providers. Making this fee available to DEN agencies would only act as an incentive to increase the number of job outcomes for Indigenous jobseekers. Again, the Indigenous placement fee is available to Jobnetwork agencies but not DENs.**

Touch Screens

- **Jobseekers of DEN services are severely disadvantaged by the lack of jobseeking touch screens in their organisations. Jobseeking touch screens provide an invaluable resource to jobseekers and the case managers working with them to identify and respond to job opportunities in the open labour market in a timely manner.**

Increased access to Jobseeker Information on EA3000

- **The current access to information for jobseekers in DEN programs is limited. Time taken to access additional client information would be greatly decreased by DEN provider's having full access to EA3000 systems similar to the access provided to Jobnetwork providers. To gather this required information DEN's are making numerous phone calls to various departments and agencies.**

Job Capacity Assessment Process

- **The Job Capacity Assessment process continues to create an administration burden for agencies which is costly and time consuming. This is mainly due to inadequate, inappropriate and unprofessional referrals. Issues include lack of staff training, staff turnover and lack of qualifications in Job Capacity Assessors. On many occasions extremely difficult/complex clients who are often homeless, with severe behavioural, psychiatric, drug/alcohol problems present themselves to JCAs. These jobseekers are often referred to totally inappropriate services.**
- **Many highly disadvantaged clients evidencing over 5 major disadvantages on their Job Capacity Assessment and who require intensive assistance and intervention programs with a capacity to work only 0-7 hours are being referred inappropriately directly to DEN. The federally funded Vocational Rehabilitation Program was established to assist highly disadvantaged clients requiring short term intensive intervention. Clients can only access this programme if they have an assessed work capacity of 8 hours or more however clients can be referred to DEN providers with a 0-7 hour work capacity. This severely disadvantages clients with high support needs requiring access to Vocation Rehabilitation.**
- **Many clients having Job Capacity Assessment reviews undertaken by file information only or by telephone without the assessor officially meeting with clients. In Castle's opinion a professional assessment on clients with high support needs cannot be adequately undertaken without face to face appointments.**

Jobseeker Program Transfers

- **Clients may experience a change of circumstances requiring them to be transferred to another program. For example, a reassessment/review may result in a client with participation requirements and receiving newstart now qualifying for a disability support pensions with a voluntary participation requirement. These clients are currently not being transferred from the inappropriate Uncapped program to the more appropriate Capped program. DEEWR have advised agencies that if clients wish to register with the more appropriate Capped program they must be exited from the current inappropriate Uncapped program. This has a negative impact on the agencies KPI's regarding their exit outcomes and creates costly increased administration.**
- **EA3000 does not include the capacity for clients to be transferred to alternate service provider due to relocation. Agencies therefore have to exit clients which negatively impacts on agencies KPI's.**

Inappropriate Program Referrals

- Many clients are referred to the Uncapped program who should have been referred to the Capped Program. For example, jobseekers with reduced or voluntary participation requirements clearly fall within the guidelines for a Capped program but are often being referred to the Uncapped program. The Capped program is designed to better cater for the individual needs of this jobseeker cohort e.g the Capped program can offer ongoing maintenance support while the Uncapped program cannot. Another disadvantage is the voluntary client in the Uncapped program is forced to look for work for 15 hours per week which is often beyond them. In the capped program the same client could be afforded the dignity of attaining work with more suitable hours. The disadvantage to the agency is that in the Uncapped program the client must achieve 15 hours or more to claim full outcome payments. These clients we believe, should be transferred by DEEWR or Centrelink from the Uncapped program to the Capped programme to ensure clients and DEN providers are not disadvantaged. Castle believes there should be a clearer delineation between the capped and uncapped program, that is the Capped program needs to provide services to voluntary clients and the Uncapped program provide services to activity tested clients.

Disabled New Apprenticeship Wage Scheme

- DEEWR should adequately recognise the hard work undertaken regarding the placement and ongoing support by DEN providers of disabled new apprentices. Currently agencies receive a flat apprenticeship outcome payment regardless of the DPI level. Clients with a DPI level 4 require far more intensive and time consuming support than clients with a DPI level 1.
- Time spent and complexities experienced in the reconfirmation of clients disability to access the disabled new apprenticeship scheme is discriminatory. Many clients with life long disabilities are required to annually validate their disabilities to continue eligibility to their apprenticeship.

Tutorial Support for Disabled New Apprentices

- On many occasions DEN providers work with group training companies and Registered Training Organisations to place apprentices and trainees. These organisations have advised that in their experience, placing a person with a disability is a far more complex, costly and time consuming exercise than the placement of a mainstream apprentice or trainee.
- Training Organisations supporting disabled apprentices are entitled to access an annual \$1,500 additional tutorial support fee. Most training organisations do not have the resources or staff to provide this service. DEN providers should have access to these funds and the two providers

could then work collaboratively toward success for the disabled new apprentice, the training organisation and the employer.

Disincentive for Voluntary Jobseekers

- **Voluntary clients who have no workplace participation but who choose to work are extremely hesitant to place themselves forward once DEN providers outline the possibility of an automatic review of their DSP entitlement.**

Once again I thank you for the opportunity to comment on these significant and important issues relative to the career pursuits of jobseekers with a disability.