

SOUTHERN YOUTH AND FAMILY SERVICES (ASSOCIATION INC.)



Youth Accommodation and Housing Services Youth Outreach Support Services Youth Out of Home Care Services
Youth Health Services Youth Employment, Education and Training Services Family Support Services

Response to request for comments to the department February 2008

11th February 2008 (re-sent on 7/3/08)

Minister O'Connor,
c/- Michael Manthorpe
Group Manager
Labour Market Strategies
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Dear Michael,

Thank you for the opportunity to provide feedback to the Department and the Minister on labour market strategies. My apologies for the late reply. We sent this by email in February and have only just come to realise our server may have failed at that time with a number of items now being identified as not having been received. I am resending this now in the hope you will still consider it. This is an exciting time and we hope the new Government will be able to lead some positive changes in this area for our target group, young and disadvantaged people.

We just want to explain our agency so you have some understanding of where we are coming from as our main interest is in JPET and also access to a wider range of program for our clients. Southern Youth and Family Services (SYFS) was formed in 1978 and is a medium sized community agency providing services to young people and their families in southern NSW and we have one nationally deliver program. The Service covers four Local Government Areas of Wollongong, Shellharbour, Kiama and the Shoalhaven and recently was successful in obtaining a National Project. We have also been successful in the recent Expression of Interest process (EOI) for Out of Home Care (OoHC) in NSW for the whole Southern Region to the Victorian border.

In many ways, SYFS can be seen as a local site which embodies the whole of Government approach. SYFS has developed and enhanced services and added programs to meet the needs of young people. We have a strong view that you have to meet many needs simultaneously to help a young person. SYFS offers a wrap around service response for a young person.

The agency receives funding from a number of programs including:-

- The NSW Department of Community Services through the Community Services Grants Program (CSGP) for the Family Counselling Project, Out of Home Care (OoHC) Program for both residential care and independent living support, the Supported Accommodation Assistance Program (SAAP) for various residential and outreach supports, and Drug Summit for the RAGE Program for support for young people with specific issues such as drug and alcohol problems, and other at risk behaviours.
- The NSW Department of Housing and the Office of Community Housing (OCH) for Supported Housing Initiatives Program (SHIP), Crisis Accommodation Program (CAP) and leases.
- The NSW Department of Juvenile Justice Post Release Support Program for RAILS for outreach support.
- The NSW Education Department for the Links to Learning Program for educational programs for early school leavers.



- The Commonwealth Department of Education, Employment and Workplace Relations (DEEWR) through the Job Placement, Employment and Training Program (JPET) and through the Youth Bureau, Connections for education and pre vocational support.
- The Commonwealth Department of Families, Housing, Community Services and Indigenous Affairs (FAHCSIA) through the Reconnect Program for early intervention for families, and from the Mental Health Community Based Program for early intervention for young people and families with mental health problems and Local Solutions Program for special assistance to young parents,
- The Commonwealth Department of Families, Housing, Community Services and Indigenous Affairs (previously) and we now understand this may be through the Department of Employment, Education and Training (DEEWR) through the Youth Bureau for Newly Arrived Youth Support Service Program (NAYSS) special assistance to young people and families who have recently arrived in the country, Emergency Relief emergency cash assistance, Transition to Independent Living Program (TILA) a special allowance to young people leaving care.
- The Commonwealth Department of Health and Ageing and South Eastern Sydney and Illawarra Area Health Services (SESIAHS) for the Innovative Health Services for Homeless Youth Program (IHSY), the Non Government Organisations Grants Program for the National Women's Health Program (NWH) and the Healthy Active Program for Youth Program (HAPY) for services in adolescent health.
- National Youth Mental Health Foundation Youth Services Development Fund for the new youth friendly General Practice Health Service.

The agency manages thirty services including:-

- Crisis Youth Refuge
- Two residential medium term supported accommodation services
- A Foyer service combining employment, education and accommodation
- Two outreach accommodation and support services with living and social skills education
- Two outreach support and brokerage services which support and provide financial assistance to young people with issues such as drug and alcohol, mental health and other risk behaviours
- Two residential out of home care services, one short term and one medium term and with outreach support
- A subsidised community housing program
- Two early intervention programs working with young people and families to keep young people engaged with family, to prevent homelessness
- Two early intervention programs working with young people and families to keep young people engaged with family, to prevent homelessness with a special emphasis on young people and families newly arrived in the country
- Two early intervention programs working with young people and families to keep young people engaged with family, to prevent homelessness with a special emphasis on people with mental health issues
- A specialist intervention project focussing on mental health and suicide prevention
- A family and adolescent counselling service
- Three services focussing on employment, education and training with curriculum based education, flexible support, pre vocational assistance and assistance to gain employment
- Four adolescent health services - an adolescent health service, a service for young pregnant women and young mothers and babies, a healthy lifestyle program and a new General Practice
- A national Transition to Independent Living Allowance Program which distributes the Commonwealth Allowance to young people leaving care

- An Emergency Relief Program
- Koori Group providing a soft option entry point for Koori clients
- A service which supports young parents as an early intervention strategy

The target groups are:-

1. Families with adolescents in need of support and the family members of the young people using SYFS services
2. Young people aged twelve to twenty four years who are homeless and/or disadvantaged (unemployed, in poverty, housing stress etc) and/or vulnerable. This group includes:-
 - Young people in the care of the State Department and State Wards
 - People with disabilities
 - Aboriginal people
 - People from Non-English Speaking Backgrounds
 - Young offenders and those at risk of entering the Juvenile Justice system
 - Young people in need of protection who have been abused or are at risk of abuse
 - People with mental illness
 - People with alcohol and other drug use and other at risk behaviours such as suicide attempts, prostitution, and others
 - Refugees and new arrivals
 - School attendees and early school leavers

In the last financial year we:-

- Received 12,078 referrals to our services
- Provided 9,531 instances of service
- 626 families and 1,431 young people received services such as family support, counselling, accommodation, case management, and all other relevant services - a total of 2,057. This is an increase on the previous year which when 1,647 services were provided and 1,590 in the year before that.
- 2,547 requests for assistance not able to be met.

Please find attached our specific comments about Labour Market Programs. We have addressed our comments to the areas you identified but have also provided specific comments on JPET. I am happy to speak to you if you should require further information.

Yours Faithfully,

Narelle Clay, AM
CEO

Responses to the Minister for Employment Participation

Early interventions minimise the number of long term welfare dependent Australians of working age (including a review of the JSCI):

We very much support the notion of early intervention and of our target group, homeless and disadvantaged young people, it is essential that a suite of services and supports are provided to minimise the chances of the young person becoming long term disadvantaged. We have a much broader view though of early intervention than the labour market programs provide. The evidence base and the experience of working with young people indicate that building the relationship, having contact both formal and informal, having many options to offer and being able to provide whatever time with the young person to assist them to meet their needs are the essential criteria to effective early intervention and support for young people. Our experience of labour market programs is that are much more singularly driven to gain an employment outcome and miss many opportunities to effectively engage with the young people which will in the long term reap a more positive result. We make specific comments about JPET at the end and hope that JPET can be allowed to return to a more flexible delivery model than is currently the case.

Young people

It is our understanding that the JSCI is used to determine the type of assistance that should be provided to the job seeker i.e. whether they are fast tracked into Intensive Support Customised Assistance or remains as Job Search Support (which can mean waiting for three months before accessing a case manager). Our Staff have had the opportunity to observe the Centrelink initial interview where the JSCI is first delivered by their CSO's. In our experience, clients were not always informed of the purpose of the "opened ended questions" asked which are conducted in semi-structured interviews and as a result we believe that the answers provided to the questions were far from correct as job seekers believe that there is a hidden agenda to the questions being asked. They sometimes believe that if they answer a question negatively than this may affect their payments. JSCI's rely completely on self disclosure and clients often require coaching to achieve the correct level of assistance. Our young clients do not all cope well in this system and the onerous nature of all the interviews, assessments and criteria they have to meet in fact can be detrimental to their receiving the assistance they need. One of our managers has previously been employed in a Job Network Service and now works for this agency, a not for profit organisation where he manages a JPET Program. In his experience he has seen many examples where the client's JSCI's was incorrect. In the majority of cases the JSCI's do not represent the current situation of the Job Seeker. During the contract period the "goal posts" were at times moved making it harder to fast track a Job Seeker into Customised Assistance. For example, only two years ago an Aboriginal person would be fast tracked into Customised Assistance. However, that has since changed and now ATSI clients can be in Job Search Support and they are some of our most disadvantaged people in the community. This can also be said for mature aged and disability support pension recipients who are now activity tested and also have a requirement to seek employment. In the majority of cases they are referred to Job Search Support and not Customised Assistance which clearly does not meet their needs if they are some of the most disadvantaged groups. We would urge the Government support to enable them to receive the extra assistance they may need. According to the National Employment Services Association, in 1998 33 per cent of job seekers were classified as eligible to receive a higher level of employment services. Today we understand that only 13 per cent of clients are eligible for the highest level of assistance. This is despite the fact that Job Network providers report that the level of disadvantage of job seekers is increasing as the official rate of unemployment rate falls. We would suggest there needs to be a review with community input to the scoring system used in the JSCI to determine Highly Disadvantaged eligibility.

Employment services are relevant to the circumstances and needs of the Job Seeker:

The JPET program was designed to be a pre-employment program which provides young people with transitional assistance to help them overcome barriers in their lives and re-engage them with education, training, and employment, assistance with specialist needs relevant to their barriers or further study. We fully support the philosophy and aims of the JPET Program and that the current program can meet the needs of the young person. The program was reviewed in the past as a highly successful program for the target group. Over time it is of great concern to us that the flexibility of the model has been reduced by onerous rules and a different emphasis on the employment outcomes since it went from FACSIA to the previous DEWR. The successful outcomes were in the past largely attributed to JPET's unique holistic case management approach, coupled with a high level of flexibility. This allowed JPET workers to fill gaps in services to homeless young people at the local level. Unfortunately many JPET workers report now the rules mean that some young people who need JPET will not continue to use it, the emphasis on meeting a certain number of cases places great pressure on the Service and the time needed to spend with some young people is not possible, and that the onerous administration and computer on line reporting has made the program less responsive to young people. We detail more on this further on in this repose.

A problem can and does exist when the client is being dual serviced i.e. with a Job Network provider and a JPET provider. What can occur is that the Job Network provider who would initially negotiate the activity agreement will include activities that are "job focussed" as they generally are not looking for social outcomes but employment outcomes due to the pressure that is placed upon them in achieving KPI 1. This places tension between the two providers as they are trying to achieve two different outcomes at the same time. Obviously this also places pressure on the client as they are generally homeless when referred to JPET and their main priority is to find housing, when on the other hand the Job Network is "forcing" the client through the activity test requirements and the participation requirements to still look for employment. The client would be better served if they were to be exempt from the activity test once they entered the JPET Program. This would alleviate the worry and stress placed upon clients who cannot look for work until their social and or personal problems have been stabilised.

Job Seekers with higher levels of disadvantage receive intensive assistance:

This can only be achieved by reviewing the JSCI and by restructuring the questions in a way that accurately identifies those clients who require the extra assistance or support from other programs. It should be noted that in the majority of cases most referrals to JPET occur after they have commenced intensive assistance. If the question of whether or not the client is homeless was asked in the very early stages of the initial interview a better and far more productive outcome would be achieved because the client would be referred to JPET straight away. If someone is homeless they have to prioritise their lives. Their first priority is to find safe housing which is a right of every Australian. We could achieve this by educating and training all PAGES staff in identifying a client who fits the JPET criteria and then referring appropriately.

Incentives for training which will improve the employability of Job Seekers (including incentives for long term training and education to address labour market needs):

Job Seekers are already receiving training credits for working for the dole. Incentives for training could be similar. We do not believe that Job Seekers would even want financial incentives to be able to study long term although increased financial support is needed as many are on very low incomes and have difficulty paying for their basic needs. Young independent people receive the lowest income of any target group and yet still have to pay the same level of living expenses. They also want to be granted the permission to enrol in a course. At present when a Job Seeker requests to attend a course it is left to the Job Network to approve and this is usually only for long term unemployed. If they are granted permission to attend a course it is only for short courses. The Job Seeker is not exempt from looking for work whilst studying even if it is a full time course as Centrelink are the only agency that can exempt Job Seekers who are activity tested, so they find it difficult to balance full time study and looking for 10 jobs per fortnight.

Job Seekers receive appropriate training:

Invest more in programs that support people who face special barriers when it comes to looking for and staying in work e.g. more education and individualised training, personal counseling, transport and child-care assistance. Many people currently out of the paid workforce want to work but need skills, advice, support and very often practical assistance to become engaged such as travel costs, clothes and other practical help.

Performance management principles (including star ratings and business reallocation) that support sustainable outcomes and promote quality service delivery:

This point is currently only applicable to Job Networks as their star ratings are mainly based on the time taken to place a Job Seeker into employment from commencement and the amount of highly disadvantaged clients placed into sustainable employment (this is defined as employment that takes the client off benefits for a period of no less than three months). We oppose the star rating system and do not see its value for JPET Programs. JPET outcomes must remain broadly about the social barriers addressed and the assistance to re-engage and this could not and should not become the subject of a competitive rating system which would required much more defined outcomes.

The minimisation of time and money spent on administration:

The onerous accountability and reporting requirements of DEWR have gradually meant that over time far more time is now spent meeting the requirements and this has taken time away from the service delivery. Providers have become burdened with the higher regulatory and contractual obligations. It has become too complex, too driven by a lack of trust in the funding relationship. In small community organisations such as JPET Services the burden is huge and disproportionate to the funding received. We totally support the need for accountability but the requirements are too demanding.

We should strive to aim at reducing the burden of excessive reporting and administrative processes for non-government organisations. JPET providers should have more time to focus on helping young people make the most of their lives not be bogged down in paper work. DEEWRS micro-management of detailed process arrangements (rather than outcomes) and the demands that this places on providers only results in a large proportion of staff time devoted to administration instead of direct client contact. The costs of service provision are increasing and not being met by compensating fee adjustments or indexation. Their currently is a need to duplicate records both electronically and on paper. The reasons we are informed is to allow DEEWR to conduct desktop monitoring.

JPET needs special consideration. It is a program intended and designed to meet the needs of disadvantaged and homeless young people and intended to assist them to overcome the social barriers to engaging in education, employment and training and community life. It has shifted substantially over the last few years and we believe this has been to the detriment of the target group receiving JPET and also to the services delivering it. In the current new agenda to address homelessness consideration needs to be given as to whether JPET should be connected more closely to SAAP services and the homelessness agenda and an alternative view is perhaps it could sit in the Youth Bureau and have greater connection and similarity to other programs for young people. JPET is also similar and links well to Reconnect Services which have remained in FAHCSIA and this link and connection needs to be strong. The administration of such programs needs to be streamlined, be less onerous and be sensible and related to the types of organisations delivering the services.

Specific Comments About JPET

These comments have been developed through the JPET Ministerial Advisory Group. This group was comprised of members with particular expertise, experience and knowledge, with a representative spread across the States and territories, and from both local and national non government service providers. It initially was formed in 2005 under FaCSIA, and was reformed as a Ministers' Working Party under DEWR in late 2006. At the last meeting in December 2007 the Working Party was informed by DEWR that as we were appointed by the Minister who was no longer in Office we were no longer required. This Working Party has acted as a consultation mechanism to the Departments: providing advice; feedback; and input into the direction of the Program. The JPET Working Party are concerned this Consultative forum was disbanded leaving no formal avenue for consultation with representative industry group

Members of this group are still very keen to act as a consultation body to the Minister and Department on JPET matters until such time as the Minister considers what options he would have as an advisory mechanism. The group felt their knowledge and perspective on JPET would prove to be very informative. We have a commitment to the young people that we work with and we are keen to ensure they receive a high level of support, that is appropriate and relevant to their needs, and we seek to maintain JPET and a support service to homeless and disadvantaged young people that will enhance their opportunities for economical and social inclusion.

Since December 2006 the Group raised a number of issues with the DEWR representatives on the JPET Working Party concerning, the appropriateness of directions taken in DEWR under the Howard Government and in particular recent JPET changes. Concern has been expressed that these are compromising a program that has been found to be highly successful at meeting the needs of a very vulnerable group. With the new Government's stated priority of homelessness it is timely to seek to ensure the integrity of JPET is maintained and that our issues and concerns are heard.

History and Context of JPET

JPET was originally funded by the then Labor Government in 1993 until 1994/95. The program was a key initiative developed in response to the findings of the National Inquiry into Youth Homelessness chaired by Brian Burdekin and reported in *Our Homeless Children* a report released in 1989. It was de-funded at the same time as the introduction of the Employment Services Regulatory Authority and the contracted case management system. The Coalition Government restored the funding of JPET in 1997.

JPET is intended to be a flexible and integrated programme that aims to:

- Establish a stable lifestyle for the participant;
- Address the social barriers to participation in family, community life, education, training and employment;
- Assist the participant to attain life skills;
- Re-establish, or strengthen family links where appropriate;
- Improve the participants' participation in education and pre-vocational and vocational training; and
- Prepare participants for, and maintain them in, entry-level training or work opportunities, which are appropriate to their needs."

The JPET Programme was evaluated in 2001. This evaluation was commissioned and conducted by the Department of Family and Community Services. The Evaluation described the JPET objective as: "to assist young people who are homeless or at risk of homelessness, or facing similar severe problems, in ways which not only help them with their income and personal support needs, but which also ensure they secure career paths and sustainable futures. The 2001 Evaluation found that:

JPET has very positive outcomes for accommodation, education, training, employment and income support across all client target groups.These positive results are comparable with or better than similar government programmes. The results presented here, therefore, provide strong support for the continuation of JPET.

The Evaluation's conclusion was that the success factors of JPET included:

- Use of holistic case management – the assessment of whole client needs and the development of individualised action plans in response which address practical, psychological and developmental issues for clients;
- Ability to spend money on training and other personal requirements in a flexible way to do whatever was required to support clients;
- Use of local service providers well integrated into their communities with good track records in related service provision;
- Flexible programme delivery – allowing local service providers considerable scope to 'mould' services to the needs of local circumstances

Concerns Regarding JPET

We believe JPET was well developed and designed as a programme, that it was an excellent programme and that with its flexibility and pre employment focus met the needs of a very disadvantaged group. It's target group of homeless and at risk young people required the best support and services we could provide. We have expressed concern regarding a number of changes that have been introduced into JPET since the program has been located with DEWR. Our key concerns are as follows:-

These have included the following key concerns.

- The introduction of Participation Reporting as a requirement of JPET service provision. The use of the participation reporting (PR) as an 'engagement tool' is problematic. The very nature of the target group requires flexibility in design of engagement strategies. JPET providers were selected on the basis of their expertise with the young people they assist. Such expertise is more than capable in determining the best way to engage a particular client and when and how to use the right balance of carrot and stick. The current PR system does not allow the level of discretion and flexibility that is necessary to engage this vulnerable client group.

- A shift in the program balance away from a pre-employment model towards one that focuses mainly on economic outcomes. Our knowledge and experience of ‘best practice’ in working with vulnerable youth informs us that pre employment social and personal elements need to be addressed as a pathway toward achieving sustainable social and economic outcomes.
- The partnership arrangements between the Federal Government and providers, established at the commencement of JPET, have become overly contractual and cumbersome. Providers report a significant shift in the nature of the relationship between Government and service providers. The benefits of partnership have been lost within the contract compliance framework. The provider – department relationship has become one of distrust; rather than supporting providers to deliver the best service possible.
- The increasing and onerous level of administration and associated costs now required to deliver the program. This onerous administration and reporting regime is causing a reduction in morale and satisfaction of Staff and has led to a reduction in support time for clients. Ultimately this leads to a reduction in service provision and consequently a reduction in quality outcomes.
- Historically the funding for the JPET program has always been comparatively low (in contrast to other DEWR programs) partially due to the pre-employment status of the program and the equal weighting of social outcomes and economic outcomes. The current unit cost funding for JPET is \$1,556.00. The extra administrative requirements as part of the new emphasis on compliance, activity agreements, PRs and EA3000 (Specialist Services Application) have all been introduced without any recognition of the increased administrative workload and associated costs. Nor has there has been any indexation increase in the 2006/09-contract period. Indexation has not been provided in a fair or adequate way since the Howard Government was elected and this has severely hampered improvement, enhancement and quality service delivery. The programme has also been affected by the efficiency dividend being applied to it and again this has resulted in an overall reduction in what the Programme can deliver.
- The poor funding and lack of adequate indexation has resulted in community agencies being unable to meet the increasing costs of staff wages and subsequently this results in reduction of hours, loss of positions, higher staff turnover, and the ability of employers to be agencies of choice for workers is limited. Staff morale and satisfaction is suffering in many JPET services particularly those that are not traditional employment services but are community based agencies with a priority target group of young disadvantaged people.

Suggestions for Improvement

- Retention of a Youth Focused Service for highly disadvantaged and homeless young people young people. The JPET Working Party is strongly committed to the principal that the complex needs of homeless and disadvantaged young people is best addressed by specialist youth focused services that are flexible and appropriate. Therefore the working party reviewing the current KPI’s proposed by DEEWR administration to ensure they reflect needs of homeless and disadvantaged young people. This view is supported by the various DEWR reports on the less than satisfactory levels of access to the Job Network by disadvantaged youth.
- Increase the funding to JPET, plan in regular and reasonable indexation annually, quarantine JPET from the impact of any efficiency dividend, reduce the level of onerous administration and reporting, Improve the level of trust between the Department and community providers, allow JPET to be the Programme it was designed for.

- Reconvening the JPET Working Party. This offers an excellent consultative mechanism from highly experienced persons from a diverse range of providers who are keen to contribute constructively to the future direction of the program.
- Meeting with the Minister. That the Working Party be given the opportunity to meet with the Minister at the earliest convenience to discuss the JPET program.