

To: The Honourable Mr Brendan O'Connor MP,  
Minister for Employment Participation

8<sup>th</sup> February 2008

Dear Minister,

The Continuing Education Centre Albury Wodonga Ltd (CEC) has been a provider of the Personal Support Programme (PSP) to jobseekers in the Hume and Kiewa regions since its inception and delivered the Community Support Programme prior to this. The CEC has always felt that the PSP core objectives of providing support to disadvantaged and marginalised members of our community is akin to its own strong focus on building a healthier, stronger, more cohesive and supportive community through encouraging the personal growth and increased social participation of all community members. As such we have been pleased to be a part of the provision of both the Community Support Programme and the Personal Support Programme within our local community for nearly ten years.

We believe that the Personal Support Programme is invaluable within the pantheon of programmes available to job seekers in that it endeavours to meet the needs of the most marginalised and disadvantaged members of our community. Often times Centrelink is the first port of call for people experiencing significant difficulties and as such they are ideally placed to link those people in with a relevant support service, which may not have happened otherwise. The ability of PSP to assess and respond to a variety of client need as well as to assist them in meeting their Centrelink obligations has resulted in achieving successful outcomes for an enormous number of participants over the years.

During the CEC's period of involvement with PSP we have seen a range of changes take place within the structure and focus of the programme on a number of levels. Of particular concern for us as providers has been the transfer of the programme from the auspice of FACS to DEEWR and the resultant shift in focus from a social welfare to a pre-employment programme. The difference in the approach to the oversight of PSP between FACS and DEEWR has been the source of a number of operational changes within the Personal Support Programme which have impacted on both our clients and the CEC as providers of the programme. We would like to outline these changes and their impacts below.

Move from voluntary to compulsory participation and introduction of compliance model:

We would like to point out firstly that PSP is a programme designed specifically to support people in receipt of a Centrelink benefit who have been identified as having a range of complex personal, social and health related barriers which affect their ability to participate within their communities. People referred to the programme are frequently experiencing a combination of complicated and often debilitating issues such as drug and/or alcohol addiction, homelessness, very long term unemployment, psychiatric or psychological problems, repeated periods in custody, torture and trauma experience, domestic violence, sexual abuse, erratic or inappropriate behaviour, a history of violent behaviour, social isolation and motivational problems. For this reason the Personal Support Programme was not encompassed within the compliance system in recognition that the barriers experienced by our participants impacted directly on their ability to comply with strict attendance requirements and that any penalty imposed would only compound their disadvantage.

At its inception, participation in PSP was on a completely voluntary basis and any clients commencing on the programme did so of their own volition. This meant that PSP officers were working with people who were highly motivated to accept the support offered by the programme in addressing their barriers and improving their lives. A move to compulsory participation requirements has seen a significant shift in the mentality of participants who feel they have been forced to attend and who frequently have little inclination to address barriers which they may not themselves have identified as problematic in their lives. Further to this the fact that PSP participants have now also come under the compliance rules where failure to attend an appointment can result in the potential for a 'Participation Failure' and ultimately a loss of benefit has very much changed how participants see the programme and the role of PSP staff as support workers. These circumstances can make it extremely difficult to establish a rapport with participants who have come to see PSP officers as another arm of Centrelink who they fear could cancel their benefit at any moment. This makes the job of PSP officers very challenging as a crucial element of being able to support clients to make relevant and lasting change in their lives is in being able to develop a rapport with the client so that they trust their caseworker enough to discuss with them what are often very intimate and personal problems. Having to attend appointments to discuss issues which by the very nature of their referral to PSP are going to be of an extremely personal nature with the threat of potential 'Participation Failure' if they do not is, we feel, extremely counterproductive and not at all conducive to the development of the kind of supportive relationship which would ultimately be of benefit to these clients in addressing their identified barriers.

#### JCA process:

In terms of the client group serviced by the Personal Support Programme (i.e. those job seekers who have been identified as being highly disadvantaged) we believe that the Job Capacity Assessment unfortunately adds another layer of requirements to what is already a difficult process for many. Having to attend a JCA can mean additional expense, time, anxiety and hardship to those already struggling as well as another opportunity to incur a penalty from Centrelink if they fail to attend. This was less likely to happen when the role sat solely with Centrelink. The quality and consistency of reports too has been an issue since the introduction of the JCA system. Previously referrals to PSP came from a limited number of sources and were of a high standard. We have found however that the variety of disciplines of people in the JCA role in various organisations has meant that the reports vary widely in quality and usefulness. The fact that Job Capacity Assessors are required to make a referral to a programme at the time of the assessment can mean that job seekers who might otherwise have been referred to PSP get sent to Job Network instead due to the limited availability of PSP places. Again this limited PSP availability can mean that if a JCA does choose to refer to PSP when there are no available places they can end up on a Centrelink based waitlist and stay there until DEEWR runs the Automated Referral Process (ARP). The ARP however is run infrequently and this can mean a potential participant is left waiting on the list for lengthy periods of time while their difficulties which might have been dealt with effectively via immediate referral are becoming exacerbated. The reverse problem is also true in relation to the need for JCAs to make a referral at the time of assessment in that if a job seeker presents with no medical evidence but is clearly unable to engage in job seeking activities due to, for example, a mental health condition they end up being referred to PSP when this may in fact not be the appropriate service for them. If we then assist the client to seek diagnosis and treatment and are then successful in assisting them to access a Disability Support Pension we receive no outcome or recognition for this but are in fact penalised for not maintaining support if the client chooses not to continue to engage which is their right once they no longer have a compulsory participation requirement.

#### Outcomes and indicators:

The current model under which the performance of PSP providers is evaluated is, we feel, not reflective of the complexities of the programme or of the outcomes achieved by its participants. At present a PSP participant achieving an employment related outcome is weighted more heavily than a social outcome despite clear evidence of having addressed significant social disadvantage. For example in supporting a participant who commences the programme with identified barriers of long term unemployment, homelessness, substance abuse, an unmanaged mental health condition, social isolation, a history of violent behaviour and repeated periods of incarceration (not an uncommon set of barriers among participants referred to PSP) we will be viewed as more successful if they secure employment than if they were to leave the programme having obtained and maintained stable accommodation, accessed counselling and medical support to address their substance abuse and mental health issues, developed more appropriate anger management skills, ceased their engagement in criminal behaviour and are undertaking volunteer work or further study (not an uncommon outcome for PSP participants). This focus on employment outcomes and the view taken by DEEWR that a social outcome will be looked on as a "failure to refer", fails to recognise the extent to which many of the participants of PSP are disadvantaged and the significant amount of skill, hard work and resources that goes into achieving a good social outcome with a client.

Other High Performance Indicators such as the ratio of commencement to referral and the timeliness of referral to commencement are based largely upon factors which are outside of the control of PSP providers and again are not reflective of the work we do with participants. There is also no provision within these indicators to account for the differences within the ESA's where providers are delivering the programme and the characteristics within the communities which might account for variation in the indicators. For example we are a small provider operating within a regional area that has very little public transport. For some this transport is infrequent and costly and may require travel to reach the pick up point if it is some distance from their residence. This may affect the ability of a client to attend an appointment within the 10 working day period dictated by the HPIF which then affects our performance figures. This is in stark contrast to the circumstances within some of Metropolitan ESA's where transport is readily accessible. This is just one example but others may include the proportion of homeless, indigenous, youth or people from non-English speaking backgrounds.

For these reasons the current model of appraising provider performance and the intention to determine a 'star rating' based upon these figures is flawed in that it does not contain the tools to effectively evaluate the real life outcomes for the participants of the programme, the quality of service delivered or the skills and experience of the organisation and its staff.

#### Administrative burden:

The current reporting system for PSP, the EA3000 Specialist Services Application (EA3000 SSA), is quite cumbersome in many ways. Since its introduction it has been assumed by DEEWR that the administrative workload for PSP providers has decreased but this assumption is erroneous. Our experience and the experience of all other PSP providers we have spoken with is that the EA3000 SSA has actually markedly increased workload and the time spent performing administrative tasks. While the system has some very useful applications in terms of managing caseloads as a whole, the data which needs to be entered into the system for each individual client is excessive. Streamlining the EA3000 SSA would go a long way towards minimising the amount of time taken up in meeting the administrative requirements of the programme, freeing up PSP officers to spend more time in the provision of direct client support. For example at present to log a client contact into the EA3000 SSA PSP officers must record the contact in an online diary, go to a different screen to record a comment on attendance and then go into another screen to record details of what occurred during the contact. The previous system simply required one entry to be made per contact which was far simpler and far less time consuming.

Access to resources:

While this is not an issue related to recent changes in DEEWR policy and guidelines it is one which limits the effectiveness of the programme. PSP providers work with participants who experience a wide range of difficulty and disadvantage and for whom specialist services or other resources might be required. At present however there is no fund available which PSP providers can access to buy in services or training for clients. The Job Network has access to the Job Seeker Account and we have been told previously that we should approach them with regard to assisting clients with any expenses that are directly employment related but they refuse. Job Capacity Assessors have access to the Job Capacity Assessment account with which they can provide counselling and a range of short term medical interventions but this is only available to those job seekers who are being referred into job network so those referred into PSP miss out. Having access to an account such as this would enable PSP providers to assist with costs of transport, short courses, counselling, personal development, exercise programmes, assessments, dental and medical treatment. This is particularly needed in regional and rural areas where transport is expensive, free counselling is extremely limited and there are few medical practitioners who will bulk bill or enter into a payment plan. These limitations can significantly hamper the progress of PSP participants or may even mean that some issues are not able to be addressed at all.

The concerns outlined above are issues which impact on the efficiency of the Personal Support Programme as a whole and on the ability of DEEWR to appropriately service that section of benefit recipients who make up our clientele. Personal Support Programme providers have shown for a number of years now that they can achieve significant, relevant and measurable outcomes, both social and employment based, with a broad range of clients under difficult circumstances and with limited resources. However there are a number of areas where improvement and change are possible and indeed necessary.

PSP was initially established to assist clients who fell outside the scope of the existing employment programmes and who required targeted assistance to address a range of personal barriers that were preventing them from participating more fully in their communities. The CEC believes we have a significant contribution to make by supporting these people and believe that we could do this more effectively if the Personal Support Programme was redirected back to being a programme that underpins pre-employment programmes i.e. a programme that assists its participants to move into mainstream employment programmes when possible rather than being seen as another in a continuum of employment programmes with the sole focus of pursuing a return to employment and with all of the attendant restrictions and requirements on participants. In furtherance of our support we PSP we have also been key contributors to a potential national project known as *Lifework's Australia* and the method by which this re-educational programme would assist isolated and disenfranchised clients on PSP. Lifework's should be considered as another mechanism that could link with the Governments aspirations to assist people back into work with recognisable qualifications that realise long term stable employment outcomes.

The Continuing Education Centre is very much looking forward to seeing how the present government reshapes and redefines the Personal Support Programme and the employment services sector as a whole, particularly with regard to how it services the most disadvantaged and vulnerable within our community, and we anticipate a continued successful partnership with DEEWR into the future.

Yours sincerely

Rodney Wangman, Chief Executive Officer.