

Transition to Work Services draft Deed Submission



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1 Introduction

About this Response

NESA welcomes the opportunity to respond to the draft Deed for Transition to Work 2016-2020. NESA has long advocated for early intervention strategies to better support the transition of disadvantaged young people into work, and for investment in young people through specialist services.

This submission contains a number of comments and concerns the draft Deed has raised for our members that we feel need to be considered moving forward.

About NESA

As the peak body for all Australian employment services, NESA members have extensive coverage of the new jobactive services, Disability Employment Services (DES), the Community Development Programme as well as other critical complementary employment related programmes.

Established in 1997, NESA's focus remains on ensuring we have a vibrant and sustainable employment services industry, and we are dedicated to the development and improvement of employment services and related programmes to ensure that every individual who wants to participate in the world of work can do so.

Our membership is diverse and includes community, not for profit and private sector delivery organisations. NESA members have a great track record of delivering employment outcomes across all programmes including disadvantaged youth and those at risk of long term unemployment, and we place great importance on our relationships with employers and industry.

2 General Comments

As outlined in our response to the Exposure Draft, NESA has concerns over the financial aspects of the Deed and the ability of services to be delivered under the payment framework. The release of the draft Deed has heightened these concerns, based on the level of administration, parameters for payment and definitions of key service requirements.

The Deed is heavily based on the existing jobactive Deed – and has the same requirements in terms of much of the administration. These may be cost prohibitive, particularly for small community providers not already delivering employment services, in areas including requirements around IT, training of staff in systems etc.

The reporting and performance assessment requirements appear to be at risk of imposing a high administrative burden upon service providers. NESA would advocate that the Department review these requirements and seek to streamline where possible.

NESA would strongly advocate for all Government Deeds to include a “Diversity Employment Strategy” aimed at ensuring providers seek to employ staff that are representative of their local community and include Aboriginal & Torres Strait Islander peoples, people with disability, people who are culturally and linguistically diverse, and people for other highly disadvantaged backgrounds, rather than only focussing on employment strategies for one single cohort.

3 Specific Comments

Sample Reviews

As with the jobactive Deed – NESA raises concerns about the use of a sampling methodology when it comes to programme assurance activities. Additionally, given the relatively small number of available claims for payment against the TTW Deed we expect the ability to garner a statically valid sample to be difficult. NESA recommends reviewing the applicability of Sample Reviews to the TTW Deed.

Liquidated Damages

NESA questions whether there is a need to include a Liquidated Damages clause in the TTW Deed given the relatively small number of claims for payment available under the Deed.

Outcome Periods

Under the draft Deed it is noted that 12 Week Outcomes can be cumulative, which are adjusted by DHS. While the Deed outlines that the cumulative periods need to be no less than 4 weeks in duration, it is not explicit about how this will be measured. NESA would advocate that this be more clearly explained within the Deed and RFT to ensure providers are able to make informed predictions of outcome rates. This is particularly important as it relates directly to ongoing business due to the direct link to performance periods and quarterly places payments.

Additionally, 26 Week Outcomes are based on consecutive weeks, including any permissible breaks. However the definition of a permissible break refers to guidelines that are unlikely to be released until close to service commencement. As these are critical pieces of information that again relate directly to payments and service viability we advocate for this information to be clarified and addressed in the Deed and RFT.