

**NESA Response to Questions on Notice**

**SENATE EDUCATION AND EMPLOYMENT LEGISLATION COMMITTEE**

**Inquiry into the**

**SOCIAL SECURITY LEGISLATION AMENDMENT (STREAMLINED PARTICIPATION REQUIREMENTS AND OTHER MEASURES) BILL 2021**

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### About NESA

**The National Employment Services Association (NESA) established in 1997 is the peak body of the Australian employment services sector. NESA is dedicated to a vision of opportunity for everyone through employment and inclusion.**

Employment inclusion and participation are cornerstones of the economic and social health of society. For the individual, employment participation is more than a means to income; it provides connection, purpose and inclusion. Employment participation and productivity are key drivers of economic growth and underpin the quality of life of all Australians enabling access to such things as a well-functioning health system, quality education and strong social safety net.

The Australian employment services sector plays a critical role in preparing Australians to participate productively in the labour market and connecting them to employment opportunities.

NESA’s mission is to lead a sustainable, effective and diverse employment services sector to support individual job seekers and employers and to contribute to our nation’s achievement of employment participation objectives.

NESA membership encompasses the breadth of Australia’s diverse labour market assistance programmes including jobactive, Disability Employment Services (DES), the Community Development Programme (CDP) and all complementary programs and services. A large proportion of NESA members deliver multiple programmes.

Our membership is extensive and diverse, and open to all contracted providers (for-profit, not-for-profit and public). To illustrate, of providers of Australia’s largest employment programme – jobactive – NESA members have a collective footprint covering 100% of Employment Regions.

NESA delivers intensive policy, operational and capacity building support to member organisations. NESA works collaboratively with Government Departments, agencies and non-government stakeholders to support the effective delivery of labour market assistance and social policy. Our extensive membership and intensive member and stakeholder interaction provide unique insight into the policy and operational settings that underpin effective labour market assistance.

Response to Questions

1.       **I note your view that ‘grossly insufficient time’ has been afforded to stakeholders to adequately analyse all the changes resulting from this Bill. You suggest that this Committee seek an extension of time to report on the Bill and provide further opportunity for stakeholders to make contribution via submissions and/or supplementary submissions. Why is this important?**

Consultation is very important to the provision of rich and full feedback. Our members have diverse views often shaped by actual experiences. As such consultation enables us to offer insight into how policies and programs are playing out at the coal face. This includes identification of barriers as well as strategies/responses used to overcome issues. This may assist in identifying not only the nature of problems but better discern underlying causal factors and/or appropriate solutions/alternatives. In addition our members are able to provide insight into how they perceive issues are impacting stakeholders such as job seekers and employers they service as well as the operational environment. For example consultation with our sector often enables discovery of other layers, interpretation and/or perspectives than are presented in papers and evaluation reports.

It has also been NESA experience that policy or program arrangements do not always play out as intended and consultation assists to identify unforeseen issues or unintended consequences, that may not be evident through system or data monitoring. NESA regularly forwards examples of issues gathered through consultation with our members to relevant parties such as Department of Education, Skills and Employment or Services Australia for investigation.

To illustrate NESA does not have direct vision of how Online Employment Services (OES) operates or job seekers experience of digital service that it could draw upon to prepare our submission. While broad consultation was not possible NESA was able to contact members in the New Employment Services Trial areas in relation to OES and Job Plans. Through this limited consultation we were able to gather feedback that:

* job seekers with a relationship with providers prior to being moved to OES, were in some cases approaching our members for assistance with Job Plans (and other matters)
* our members reported assisting these job seekers to contact the Digital Contact Centre to arrange amendments to their Job Plans
* we understand communication to OES job seekers was an important inclusion in our submission as we were informed that many job seekers attending providers for assistance did not understand they could and/or what they had to do to change a Job Plan (among other things)
* the on-hold wait times for the Digital Contact Centre was problematic however we were able to confirm recently this problem had been overcome
* we were also able to confirm that the process to vary a Job Plan requires job seekers to give a reason for wanting to vary the Job Plan which had to be accepted by the Digital Contact Centre for a change to be approved (which was somewhat different than what was understood from NESA’s briefing from DESE)

**2.   Your submission focusses on 3 of the 10 schedules in the Bill. Why have you prioritised these 3 schedules?**

The timeframe permitted for examination and response in our view was grossly inadequate and as such we had to prioritise in accordance with our available resources. The 3 schedules that were included in our submission were those that we could most readily identify as being of concern. In relation to schedule 1 the number of amendments was such that we did not have sufficient time to cross reference the changes (noting no marked up version of the legislation was available) to analyse individual amendments or the result of all amendments combined and as such took a principle based approach.

**3.        The explanatory memorandum refers to the Employment Services Expert Advisory Panel report, I Want to Work. Is this Bill consistent with that report? Were you consulted in the drafting of this Bill?**

NESA works in collaboration with the Department for the betterment of employment services at every opportunity but was not consulted in the drafting of this Bill. NESA was offered a briefing by the Department at 4 pm Monday 7th June. NESA accepted the offer of a briefing which was provided 4 pm Tuesday the 8th June to assist us submit a response due on Wednesday the 9th June.

The Employment Services Expert Advisory Panel (ESEAP) made a range of recommendations which were adopted and presented in the I Want to Work report as the blue print for the introduction of the New Employment Services Model. Many of the areas examined and the recommendations made by the ESEAP were high level. NESA notes that despite earlier acceptance, it is apparent that a number of the recommendations made in the report will not be realised.

NESA notes that the Bill includes many matters that were not in the scope of the ESEAP however it does support implementation of a number of recommendations made by the ESEAP in particular these are in relation to:

* Establishment of Online Employment Services to assist employers and job seekers who are job ready and have capacity to self manage their journey to employment
* A more tailored and flexible approach to Mutual Obligation and Activity Requirements

**4.       You make the comment in your submission that “it is disappointing that the commitments to increase investment in those most disadvantaged in the labour market have not been realised”. To what commitments are you referring and can you please explain why you have arrived at that conclusion?**

The I Want to Work report was clear in its intent that the new model of employment services should be focused on directing more resources to those job seekers who need the most assistance through implementing smarter and more targeted investment as indicated in the following quote:

*“The future employment services system will ensure that funds are invested in smarter, more targeted ways. It is smarter to invest in a digital and data ecosystem which helps all job seekers look for work, with many being able to self-service. This creates cost efficiencies. It is smarter to invest in automating business processes and administration. This creates time efficiencies. It is smarter to invest in a data ecosystem which analyses what works and what doesn’t for job seekers. This creates outcome efficiencies.* ***It is smarter to spend this time and money on job seekers who need the most help. It is the best chance we have to break cycles of welfare. It’s the best chance we have to cut entrenched unemployment. This is how we will invest”.***

NESA also notes the Doorstop Melbourne - Transforming employment services with [The Hon Kelly O’Dwyer MP](https://ministers.dese.gov.au/hon-kelly-odwyer-mp) Minister for Jobs and Industrial Relations and Minister for Women held on 20 March 2019 in which she stated: “Critically, the savings that will come from the digital-first model will be reinvested **into people who are long-term unemployed** so that they get the wraparound services that they need in order to reduce their barriers to employment so that they can get and keep a job”. (Full version appendix 1)

NESA acknowledges and notes that the Government has invested some of the savings made through measures outlined in the 2021 – 2022 Budget to continue and/or expand selected complementary programs. However, Enhanced Services is the element of New Employment Services that is principally targeted at job seekers long-term unemployed and the most disadvantaged (notionally those in Streams B and C of current jobactive; however we note there is no transparency of proposed service eligibility criteria e.g. JSCI score thresholds). As discussed elsewhere in this response from the information that is available it appears that there has been no increase of investment in Enhanced Services compared to current arrangements and further there is potentially a decrease.

*Among the recommendations in the I Want to Work report were the top 10 things the Government should not do. Two of these top ten things not to do were to cherry pick recommendations; and to pocket savings from moving to digitalised services. It is the sectors view that the Government has done both of these things.*

5**.        Please explain how you have arrived at the conclusion that under the payment structure announced for the New Employment Services - Enhanced Services there has likely been a considerable reduction in investment for the cohort of job seekers currently in Streams B and C (those most aligned to Enhanced Services target group)?**

A proposed funding model for New Employment Services – Enhanced Services was released for consultation in late 2020. As part of the Commonwealth 2021-2022 Budget the final proposed funding model for Enhanced Services was released. The final funding structure for Enhanced Services includes a small number of amendments in response to feedback, from that originally proposed.

Despite requests there is no transparency of the assumptions underpinning the funding model or the proposed Job Seeker Classification Instrument (JSCI) score thresholds for service eligibility and outcome payments. In the absence of sound assumptions on which to produce a financial model NESA has consulted with members in the New Employment Services Trial Regions about their experience of the financial viability of the payment model and conducted some simple side by side comparisons of current funding for job seekers in Streams B and C (notional target group) and payment structure proposed under Enhanced Services.

To the best NESA can determine the funding model represents a decline in resources allocated to Enhanced Services for support to the most disadvantaged job seekers compared to current arrangement for the same cohort in jobactive. In addition there has been no provision to adjust for the loss of economies of scale and flexibility that allow providers to allocate resources within the funding envelope to those who need it most. As such arrangements that enable revenue for servicing Stream A job seekers and Employment Fund credits to be redirected into Stream B and C are not accounted for in the Enhanced Services payment model.

NESA has raised our concern that Enhanced Service does not appear to have received an increase in investment as expected to support those most disadvantaged. Furthermore, NESA has stated that potentially the funding model represents a decreased investment compared to current arrangements for the same cohort. Our concerns have been noted in writing through submissions and in various discussions with Department of Education, Skills and Employment. These concerns have not been refuted or confirmed.

Please find in attachment 1 NESA’s response to the New Employment Services funding model consultation with amendments to highlight changes to the model announced in the Budget.

**6.        In relation to Schedule 1, you suggest that following principle be applied: “only supporting proposed streamlining and consolidation of legislation where there is a high degree of confidence that there are no adverse implications for current income support recipients or future applicants”. What are the potential adverse implications and which cohort of job seekers is most at risk?**

NESA is of the view that there may be potential adverse implications may occur for many cohorts who experience challenges in the online environment. We have a primary concern for job seekers who lack adequate language and digital literacy to use OES comprehensively. This is particularly a concern given the assessments (JSCI or Job Seeker Snapshot as the online version is known and digital literacy) are conducted online. As such disadvantaged job seekers may experience issues and/or delays trying to connect with services and therefor have their income support payments affected.

Moving to Online Employment Services increases the cost of participation for all job seekers and increases the importance of having access to the internet and electronic devices to avoid risk of non compliance, incurring demerits and potential impacts on income support. Job seekers in areas with poor IT infrastructure, such as exists in many regional and rural areas may experience a higher volume of access issues and potentially higher interaction with compliance systems.

**7.       Do you have concerns that this Bill omits current safeguards for income support recipients and future applicants (particularly those who are known to face increased barriers, vulnerabilities and be on the wrong side of the digital divide including Indigenous people, people with disability, principal carers, refugees and mature age workers)?**

NESA is concerned that while a significant proportion of employment services are moving to a digital environment there are no new protections tailored to this environment to ensure job seekers rights are maintained. In particular there is no specific undertaking in the Bill about measures to ensure job seekers are informed and understand their rights, responsibilities and avenues to access assistance when engaging via OES.

To illustrate the narrative with the Bill states that job seekers in OES will have access to assistance from a human where they choose but it does not state how they will be advised of this or how someone indicating a need for assistance will not be disadvantaged. For example if a person in OES cannot complete their Job Plan independently and requests assistance but cannot access it and develop an approved Job Plan on the same day, their start date will be impacted.

NESA notes that the experiences from the OES Trial indicate the importance of improved communication. Participants in the OES Trial were individually screened to ensure they had no significant barriers to employment, they were digitally literate, had access to a digital device and they were briefed and volunteered to be involved in the trial. Despite this level of interaction the evaluation report shows that OES participants has a lower awareness of service than the control group in face to face services with only 72% understanding they had the right to opt out of OES.

**8.       In your submission you state that ‘NESA opposes the amendments under schedule 8 in their current form’.  You argue that attaching the payment start date to the acceptance of the Job Plan will place pressure on job seekers to accept a Job Plan that is not suitable to their circumstance in order to receive payment. Can you explain why the Online Job Seeker Classification Instrument (JSCI) Trial Evaluation Report found that of all trial participants, 51% completed the JSCI and 80% of these did so because they thought it was a compulsory part of the income support process?**

The Online Job Seeker Classification Instrument (JSCI) Trial Evaluation Report indicated that of all participants enrolled in the trial only 51% went on to actually complete the JSCI online. It further notes that when surveyed about why they completed the JSCI 80% of these did so because they thought it was a compulsory part of the income support process. As indicated there were also many reasons why job seekers reported they did not complete the JSCI some of which highlight the need to ensure requirements and rights are clearly communicated and there is some mechanism to ensure job seekers understand what these are.

Please find a copy of the Online Job Seeker Classification Instrument (JSCI) Trial Evaluation Report attachment 2.

**9.      You make the point that job seekers engaged in face-to-face services have the right to be informed of and accept a period of up to 48 hours ‘think time’ to consider their Job Plan before accepting it, without impact to their payment start date. However under the proposed arrangements job seekers in online services would experience a change in their payment start date if they took time to consider the appropriateness of their Job Plan before accepting it; and this potentially leads to inequity. Isn’t it possible that a job seeker in online services could agree to a perhaps less than satisfactory Job Plan almost immediately in order to secure their payment start date and then subsequently vary it at their leisure?**

Yes it is possible that a job seeker could agree to perhaps a less than satisfactory Job Plan almost immediately in order to secure their payment start date, and then subsequently vary it at their leisure. However while the suggested process may be a workaround it introduces another level of complexity for the job seeker that NESA considers is avoidable.

As an over arching comment NESA is concerned that the issue of job seekers taking too long to complete Job Plans is being attributed to chosen behaviour and addressed by punitive measures. Our members experience in servicing large numbers of job seekers referred from OES and who had failed to complete their Job Seeker Snapshot and/or Job Plans while in OES is that many needed assistance and/or did not understand the requirements or the technical process.

As we are in the process of developing the digital employment services platform there is a question of why this issue cannot be addressed through a technological solution e.g. enabling job seekers the choice to lodge a provisional acceptance of their Job Plan triggering a 2 days think time option before final acceptance without impact on their start date – where the person needs think time.

If a person accepts a Job Plan, requirements must be met and this may be an issue if there is any unforeseen barrier to changing it. As per below - Provisions do not explicitly state that job seekers are permitted to vary a Job Plan at their discretion. There is also no guarantee that limitations would not be introduced through operating measures/guidelines. NESA’s experience is that systems/guidelines are often changed as a result of the behaviour of few which then impacts many. It is quite reasonable to assume there is a high risk of a few job seekers making excessive variations to Job Plans to avoid requirements. NESA anticipates if such behaviour became evident consequently efforts to address this behaviour through change to systems/guidelines would be implemented.

**40V Variation, cancellation and review of employment pathway plans**

**Variation**

(1) The Employment Secretary may vary an employment pathway plan that is in force under Subdivision A in relation to a person after discussion with the person and after taking into account the matters mentioned in paragraphs 40D(5)(a), (b), (c) and (d).

(2) The Employment Secretary may vary the plan on the Employment Secretary’s own initiative or on request of the person.

(3) If the person requests a variation of the plan, the Employment Secretary must:

(a) make a decision under subsection (1) to vary the plan; or

(b) make a decision to refuse to vary the plan.

(4) The Employment Secretary must notify the person of the variation or of the decision to refuse to vary the plan.

(5) If an employment pathway plan is in force under Subdivision A in relation to a person, the person may vary the plan in accordance with the processes referred to in subsection 40B(1).

The job seeker would have to initiate the suggested workaround and that requires that they know they are permitted to change their Job Plan at any time. As such NESA reiterates its position that job seekers being services via OES must be adequately informed of their rights and responsibilities just as job seekers serviced in person are required to receive and confirm they have understood.

**10.     You note that the Bill contains no definition/guidance on what types of circumstance are intended to constitute “circumstance beyond a person’s control” for failure to enter into a Job Plan earlier that should satisfy the Employment Secretary. Do you have concerns with the degree of discretion available to the Employment Secretary? If so, why?**

NESA holds concerns that without some substance to understand the intent which could include definitions or principles that there is a significant risk of inconsistency and inequity. In addition without some indication of how this protection may be called upon we have no indication if the process itself may be too difficult and thus will no be of no protection or remedy.

To illustrate, an inability to purchase data to access OES and accept a Job Plan may be attributed to the individual’s budgetary decisions and therefore in their control. For example, it may be deemed they could have gone to Services Australia, McDonald’s or the library to use computers/WiFi. In such a case, will the person have to prove they had insufficient funds?

In NESA experience when such matters are not well outlined the outcome of processes are often dependent on the agency of the individual and their capacity to advocate for themselves.

**11.     The explanatory memorandum indicates that before a job seeker is offered the opportunity to enter an employment pathway plan via the new online arrangements, they will have their circumstances assessed with those job-ready being able to use and access Digital Services to choose to manage their requirements online, without being serviced by a provider. What concerns do you have about that assessment process and the criteria that will be used?**

The Job Seeker Classification Instrument (JSCI) is a questionnaire. It seeks to identify an individual’s risk of becoming long-term unemployed. The Job Seeker Snapshot is the online version of the JSCI. The Job Seeker Classification Instrument and the online version Job Seeker Snapshot; do not assess job readiness. To NESA knowledge there is no validated assessment of job readiness in the current or proposed New Employment Services Model. As such NESA does not consider that the assessment process is an acceptable assurance that job seekers with inadequate capacity will not inadvertently be assigned to Online Employment Services.

The Job Seeker Snapshot and the digital literacy assessment are conducted online and if a job seeker is having issues their access to income support will be impacted.

An examination of those job seekers in jobactive Stream A (prior to covid) as the indicative target group will demonstrate a proportion of this cohort have low education attainment (less than yr 12), no post secondary qualifications, and have disadvantaged circumstance such as homelessness, refugees, recently released prisoners, disability and mental health conditions, experienced domestic violence and the like.

12.     **You note that being classified as Stream A means job seekers are supposed to have a lower probability of remaining unemployed for more than 12 months than others. How is it possible that, as you say in your submission, “in reality many Stream A job seekers are long term unemployed or at risk of becoming long term unemployed, do not have job search skills and would not be considered job ready using tools specifically designed to measure job readiness”?**

As stated in our submission a high proportion of job seekers classified as Stream A are long-term unemployed. NESA notes that duration of unemployment is no longer a factor included in the Job Seeker Classification Instrument (JSCI) and as such when a person remains unemployed they do not attract additional score enabling movement to more intensive service Streams. The JSCI does not assess job readiness or independent job search capability.

The JSCI is, as the name indicates, a classification tool that uses relative disadvantaged to assign service eligibility rather than an individual assessment of service needs. The sector notes that many job seekers who are not job ready and who face significant barriers such as homelessness, recently released prisoners, refugees, people with a disability and people with poor literacy/numeracy to name a few are classified as Stream A.

There is no transparency of how service eligibility thresholds (JSCI score for each service/service level) are determined other than we understand that they reflect the programs financial modelling e.g. the proportion of job seekers permitted to be eligible for Stream A, B or C or in the case moving forward the proportion eligible for OES and for Enhanced Services.

**13.     From October 2021, there will be an additional requirement for job seekers who have been participating in jobactive and Online Employment for six months to undertake an activity (such as a short training course, or an 8-week version of Work for the Dole). How will this be managed in the jobactive and online systems?**

Management of Activity Requirements and Mutual Obligations have been a significant part of the face to face employment services since the introduction of the Active Participation Model in 2003. Providers will work with job seekers to ensure they are in a suitable activity as determined by the guidelines and circumstance by the required time with funding available through the Employment Fund to pay for activities where required. NESA notes that additional credits to the Employment Fund are available to pay for Work for the Dole under jobactive. At this time there is no indication of similar credits to the Employment Fund being available under Enhanced Services and how it is expected that providers cover the cost of such activity in the new model.

NESA is unaware of the proposed service model to assist job seekers in OES to access a suitable activity in the required timeframe or how such activity will be funded.

Appendix 1 – Doorstop Melbourne - Transforming employment services

Accessed online from [The Hon Kelly O’Dwyer MP](https://ministers.dese.gov.au/hon-kelly-odwyer-mp) Media Centre

Date: 20 March 2019

Ministers:

[The Hon Kelly O’Dwyer MP](https://ministers.dese.gov.au/hon-kelly-odwyer-mp)

Minister for Jobs and Industrial Relations

Minister for Women

**KELLY O’DWYER:**

Today, I'm announcing one of the most significant and transformative changes to Australia's employment services system. We know that one of the most important things that any government can do is to give people a helping hand to get and keep a job. Getting a job can change people’s lives for the better - giving them choices and opportunities, helping to build their confidence, their dignity, and their financial independence. And our Government is proud of our achievements in this space, with more than 1.2 million jobs created since coming into Government, the majority of those jobs being full-time jobs, and of course, the majority of those jobs being held by women. We have got a record number of people in employment now and a record number of women in employment. We have the lowest levels of welfare dependency in 30 years and we have steadily been closing the gender pay gap, which under Labor reached a high of 17.2 per cent and has come down under us to 14.2 per cent.

We have an employment services system that has been in place since around 1946. But it is a system that has been delivering for so many millions of Australians, but we know there is even more that can be done. Around 1.3 million placements have been made since 2015, but still the long term unemployed, who are still reliant on welfare payments, remains very entrenched, with one in five people on employment services still receiving welfare payments five years on. We want to see that number changed because, of course, whilst the cost to the Australian taxpayer of people being reliant on welfare is to the tune of around about $411 billion over the life cycle of someone of working age,  I want to put it another way, around $315,000 per person. But very significantly, it has a direct impact for that person as well. We know it can lead to intergenerational welfare dependency, with around 39 per cent of people who are reliant on income support payments having children who themselves are receiving income support by the age of 20.

That is why today, we are announcing a transformative change to employment service provision. We are announcing a pilot that will begin on 1 July in New South Wales and in South Australia that will put employers and jobseekers at the centre of our employment services system. It will have a focus on digital-first, where people will be able to search for their jobs and the government gets out of the way. But it will also, importantly, have a safety net for those people who need it, where they can talk to somebody directly, person to person, to make sure that they get the support that they need.

Critically, the savings that will come from the digital-first model will be reinvested into people who are long-term unemployed so that they get the wraparound services that they need in order to reduce their barriers to employment so that they can get and keep a job. This is a critical change. We also know that only around 4 per cent of employers currently use our employment services system right now because there's too much red tape and it's too cumbersome to be able to access the support that they need. This will also change so that they will have a free online tool to help them get the people to fill the skill shortages that they need when they need it.

We also are re-confirming our commitment to mutual obligation. Those people who are receiving welfare support do need to be searching for a job. That is going to be a critical part of this new system as well. But it needs to be more tailored and more flexible to the individual needs of those who are searching for a job.

Finally, there will be a licenced framework rather than a rolling tender process every five years or so. This will mean that we can preserve the best parts of the system and keep within the system those people who are doing a good job whilst exiting those people who are not achieving the outcomes for job seekers and employers that we expect and demand.

So, in summary, this is a significant and transformative change. It's a change that will help millions of Australians be able to get and keep a job. It builds on the strengths that the Coalition has been able to achieve during our time in Government and compares to that that would be offered by a Bill Shorten government, which when they were last in government, saw around 200,000 extra people left in unemployment and one in every eight manufacturing jobs lost. They also have a recipe for industrial relations chaos and division, which will do nothing to grow our economy, create new investment, and create new job opportunities.

**JOURNALIST:**

Will this shift to a more digital service result in less face to face services at all?

**KELLY O’DWYER:**

There are a lot of people who tell us that they want to simply be able to find their jobs online, and this is what we would expect in a changing jobs environment that is so focused in the digital space now, with Australians being some of the first adopters of digital technology. But we can't leave people behind. We know that there are some people who don't have the digital literacy to be able to actually access digital services and for them, of course, it's going to be important that they have face-to-face services to help them to be able to obtain a job.

**JOURNALIST:**

Will there be less, though? Will it be the same amount or is there going to be a reduction?

**KELLY O’DWYER:**

There will be a reduction in the caseload of people that job service providers will be dealing with, absolutely, but they will more intensively be working with the caseload that they have. And importantly, the money that is saved from the digital-first model will be reinvested in those people who need to have further help and further support; those people who have barriers to their employment – they might live in regional communities where they have less access to transport. And of course, intensive services to help them being able to overcome those barriers will be an important part of the new framework that will be in place.

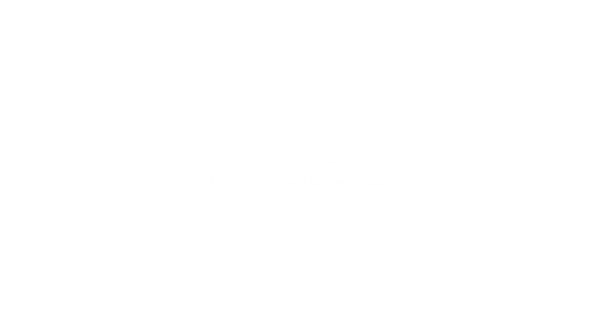
**JOURNALIST:**

With the digitisation of the Centrelink system, we saw the whole robo-debt saga. Can you guarantee that there won't be similar problems with this system?

**KELLY O’DWYER:**

It’s important to say that we are piloting the system for two years for very good reason. We recognise this is such a fundamental and transformative change and in order to make sure that the national rollout is done in a methodical and careful and structured manner, you need to have that pilot process to make sure that there are no unintended consequences, and that's precisely what we have announced. It is important for us to get this right, and to get it right from day one and to make sure that any requirements that we need to put into the national rollout are done through the national pilot program that will commence from 1 July this year in New South Wales and in South Australia.

### - Other matters covered in interview not included



#weR4jobs

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