National Employment Services Association
Submission on the draft Grant Opportunity Guidelines for the
Reconnection, Employment and Learning Program

The National Employment Services Association (NESA) welcomes the opportunity to provide feedback on the draft grant guidelines for Phase 1 of the Reconnection, Employment and Learning (REAL) Program.

As the peak body for the Australian employment services sector, NESA strongly supports the REAL Program's intent to improve justice-to-work transitions for First Nations people and to contribute meaningfully to Closing the Gap targets and Priority Reforms. This initiative represents a critical opportunity to reshape outcomes for First Nations people leaving incarceration, and to embed culturally safe, strengths-based approaches to reintegration and economic participation.

In the spirit of constructive collaboration, we offer the following feedback and recommendations:

1. Participants First – Prioritising the Best Interests of First Nations People Leaving Custody

At its core, the REAL Program must serve the needs, aspirations, safety, and dignity of First Nations people transitioning out of the justice system. This requires:

- Embedding **participant agency and cultural identity** as central pillars of service delivery.

- Supporting **individualised, strengths-based support plans** that recognise the holistic needs of participants—including cultural, emotional, social and economic wellbeing.

- Prioritising **continuity of care** pre- and post-release, including trusted and supportive relationships with mentors and consistent access to services in the locations participants return to.

- Ensuring that **participants have access to culturally safe services**, with choice and voice in the selection of mentors, service providers and supports.

The guidelines should reflect this by strengthening requirements for providers to demonstrate their commitment to participant-centred, culturally grounded approaches in both service design and delivery.

---

2. Workforce capabilities and skills

The guidelines provide no reference to key workforce capabilities and skills, other than lived experience, and general checks (such as Working with Children Checks).

Organisations delivering the REAL Program will face significant complexity in supporting participants across a broad age range—from young people as young as 15 through to older adults.

This is not a low-cost model. Delivering effective, culturally safe support across this spectrum will require multidisciplinary teams with a wide range of capabilities, including youth-specific engagement, trauma-informed care, cultural mentoring, and post-release reintegration planning. Recruiting staff with the right mix of skills—particularly in regional or remote areas—

will be a considerable challenge, and one that must be factored into both funding levels and implementation timelines.

Furthermore, the current guidelines provide limited detail on the professional skills and qualifications required to deliver the program. Beyond the reference to lived experience—an essential component—there is a lack of clarity around the broader competencies needed for high-quality service delivery across justice, employment, health, and youth sectors. This lack of specificity may lead to inconsistent service standards and confusion among applicants regarding workforce planning and recruitment.

NESA recommends expanding the program guidelines to include a clear outline of the core skills, qualifications and capabilities expected of staff delivering the REAL Program, across both youth and adult cohorts. This should complement, not replace, the valued inclusion of lived experience, and support providers in workforce planning and recruitment.

3. Ensuring Continuity of Care Across Geographic spread of the program

A central challenge to the REAL Program's effectiveness will be ensuring continuity of care, particularly given the limited funding available in Phase 1 and therefore the likely narrow geographic spread of providers. Ensuring seamless handover and sustained support beyond correctional facilities is essential to breaking cycles of recidivism and achieving lasting reconnection with community, culture, education and employment.

It is highly probable that a proportion of participants will return to Country or relocate to areas not covered by the funded service footprint. Without adequate mechanisms and resourcing for warm referrals, outreach capacity or service portability, there is a real risk of participants disengaging post-release—when support is most critical. The guidelines should explicitly acknowledge these challenges and require tendering organisations to outline strategies to address them.

Given these challenges, successful providers must have adequate funding and sufficient flexibility in the use of funding to ensure they can properly support and facilitate coordination with other providers, support outreach, and service delivery models easily adaptable to the mobility of participants.

Currently, given the funding pool available for this program and the broad spread of the program across all states and territories, it is not clear how providers will be sufficiently resourced to meet these complex demands as well as hire the appropriate workforce.

4. Enable Participation of Small and Community-Controlled Providers

NESA acknowledges the effort to make this program accessible to a diverse range of providers. However, we also recommend:

- Broadening the Right Fit for Risk Fund to cover additional organisational capacity-building needs for small Aboriginal Community Controlled Organisations (ACCOs), such as governance systems, compliance training, or evaluation frameworks.

- Ensuring the guidelines actively encourage and support consortia arrangements, particularly between ACCOs and experienced employment service providers, with pathways for capability development and growth.

Further, the $30,000 cap on Right Fit for Risk reimbursements is significantly inadequate to meet cyber security accreditation requirements. Initial establishment costs routinely exceed $250,000, presenting a major barrier to participation—particularly for smaller and regional providers. To enable diverse and community-led organisations to participate in the REAL Program, the funding available to meet this certification must reflect the real cost of achieving compliance.

5. Clarify Cross-Jurisdictional, Cross-Program and Post-Release Service Expectations

The REAL Program guidelines currently lack clarity on how the program will interface with both state or territory-based programs, and the broader employment services ecosystem. Without clear connections made by the Commonwealth Government, providers will not be able to gain entry to state or territory correctional centres or build necessary connections.

It is also unclear how the REAL Program is intended to operate alongside Commonwealth funded employment services programs (such as Workforce Australia, the Community Development Program, Transition to Work, or Inclusion Employment Australia), or whether REAL providers will assume the responsibilities of employment service providers for the first 12 months post-release. This ambiguity raises critical questions about referral pathways, service duplication, funding overlaps and participant transitions.

Further, there is no clear guidance on what happens beyond the initial 12-month post-release support period—particularly for participants still in need of employment or other structured support. Without a clearly articulated integration and handover strategy, there is a risk of service fragmentation and participant disengagement. We strongly recommend that the guidelines be updated to clearly outline how the REAL Program connects with other State or Territory based programs and systems, Commonwealth-funded employment programs, and what mechanisms will support participants' smooth transition at the conclusion of the program.

We recommend:

- Clarifying the C**ommonwealth Government's role in the interface with state and territory-based systems**, particularly with the correctional and justice systems.

- Clarifying expectations around **employment service programs, post-release referral pathways, post-REAL program referrals, and inter-provider collaboration**, particularly for participants relocating to different jurisdictions or regions.

- Supporting providers to **deliver wrap-around services both within custodial settings and in the communities, participants return to**, with adequate resourcing to manage transition risks.

Final Comments

NESA reiterates its strong support for the REAL Program and its objectives. The employment services sector is well-placed to contribute to its success, particularly through cross-sector partnerships, culturally capable mentoring, and local knowledge of employment and education ecosystems.

NESA and our members are committed to ensuring its success and to working alongside First Nations people leaving incarceration, ACCOs, community organisations, and government to build a more connected, just and culturally safe employment ecosystem.

We appreciate the opportunity to provide this submission and would welcome further dialogue with the Department to support program implementation and sector readiness.

Contact:
Dr Marion Byrne, Head of Advocacy, Media and Communications
National Employment Services Association (NESA)
www.nesa.com.au
Email: policy@nesa.com.au

National Employment Services Association
Response to the Department of Employment and Workplace Relations Consultation
Reconnection, Employment and Learning (REAL) Program draft Grant Opportunity Guidelines, April 2025