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Disability Employment Services Review Taskforce

By email: DESEngagement@dss.gov.au

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Amaze works to create positive change for autistic people

Amaze is a community organisation established over fifty years ago by autistic people and their families. We work to build community understanding of autism, influence policy change for autistic people and provide independent, credible information and resources to individuals, families, professionals, government and the wider community. We are closely connected with the autistic community through our national help line Autism Connect, our peer support networks and community capacity building initiatives.

Amaze welcomes the opportunity to contribute to the redesign of Australia's Disability Employment Services, noting that short timelines and competing pressures have enabled abbreviated input only. Our more comprehensive submissions on the related topics of the [National Disability Employment Strategy](#) and [TAFE and Autism](#) are attached for background and references, as is our summary submission on [Transition to Work](#) program. We are deeply appreciative of the contribution autistic people have made to informing our submission, including through engagement and surveys undertaken by Amaze and the Australian Autism Alliance's Autistic Community Survey 2020. There is strong consistency with autistic feedback in the focus group sessions that DSS engaged PwC to deliver (report unpublished).

Autistic people are three times more likely to be unemployed than others with disability, and almost eight times more likely to be unemployed than people without disability.

One third of autistic people with tertiary degrees are not working.

Autistic people have huge untapped talent and potential

Autistic people want to work, and they have capabilities and interests relevant to all types of jobs. Despite this, autistic people have long endured among the worst education, training and employment outcomes – much worse than people with disability more generally.

The covid recovery economy creates a unique opportunity to markedly shift the dial on employment outcomes for autistic people. While concerted attention to improving autistic employment outcomes is long overdue, Australia's current skills and labour shortage heightens the national imperative to unlock the capacity and capability of Australia's sizeable population of autistic people.

An autism responsive employment services system is a critical enabler

Amaze understands that many DES (and employment services providers more generally) are keen to build their autism competency and deliver strong results for autistic jobseekers. We are also heartened by the growing employer interest in hiring autistic staff (including through Amaze's Autism Positive Employment work).

An effective employment services system for autistic jobseekers is one of the critical enablers of this change. Well targeted investment to improve employment services will deliver significant dividends for autistic people, their families and the broader Australian community. Amaze calls for some immediate

improvements that could be implemented within the existing DES framework. We also provide interim recommendations for the next iteration of employment services for autistic jobseekers.

Disability Employment Services are not working well for autistic people

While acknowledging that some autistic jobseekers have had positive experiences with DES, our overall assessment is that DES is generally not working well for autistic people.

Too few autistic people are receiving disability employment supports. Despite the high prevalence of autism, *just 4%* of DES participants are autistic. This reflects:

- the over-representation of autistic NDIS participants in ADEs
- the disproportionately low rate (around 14%) of autistic NDIS participants of working age with employment goals
- the eight hours work capacity threshold which prevents people from testing and building their employment capabilities
- recent changes that narrowed DES eligibility which prevents jobseekers who can work over 30 hours per week and those not in receipt of income support or pension payments from accessing DES services
- the significant numbers of autistic adults without a formal diagnosis (exacerbated by the Medicare age cap on rebates for autism assessment for people over 13 years¹)

Over one-third of NDIS participants are autistic, yet only 4% of DES participants are autistic.

Autistic people are over-represented in Australian Disability Enterprises

DES employment outcomes for autistic jobseekers are very poor and have deteriorated. Twelve-month DES employment outcomes are *just 9%* for autistic jobseekers (2018-21), down from 12% during earlier DES model (2010-17).

“My son has used a disability service but didn’t find them to be that helpful all his jobs have been through family or friends contacts.” Autism Alliance Survey 2020

“Our son was with Agencies for about 5 years and had only one short term job.” Autism Alliance Survey 2020

“I received some support from the university and some from my Disability Employment Services which helped me gain a job.” Autism Alliance Survey 2020

Common themes drawn from autistic peoples’ experiences of DES² identify a range of challenges including:

Poor understanding of autism: DES staff typically lack the training and tools to effectively support autistic people. This undermines their ability to assist employers on autism friendly recruitment processes and workplace adjustments. Generic disability training does not address the specific challenges and enablers of autistic jobseekers.

“I immediately felt a lack of understanding of autism, was portrayed as difficult when asking clarifying questions” Amaze interviewee 2021

¹ This age cap will be lifted to 25 years from March 2023

² Amaze’s targeted engagement with community; Australian Autism Alliance Autistic Community Survey 2020; OTARC report on DES and Autism; PwC’s community engagement with autistic people on DES 2021 (unpublished)

“Lack of understanding from 6 different employment services and an assumption she was intellectually disabled. Actually very bright!!!” Autism Alliance Survey 2020

“A lot of techniques meant to apparently bring out how fit a person is for employment will just stress out an autistic person.” Autism Alliance Survey 2020

“Educate employment agencies to better understand people with autism.” Autism Alliance Survey 2020

Lack of career advice & planning: Most autistic people have had limited opportunities for vocational exploration at school and are less likely to have participated in work experience or had student jobs than their peers. The current DES system does not offer meaningful support to explore and develop career aspirations and opportunities.

“There was an extreme focus on me getting a job – any job – rather than supporting me into meaningful employment related to my studies.” Amaze interviewee 2021

“Agencies like [deleted] just want to throw people into jobs to make their numbers look better. They don't care to ask what job would be best for them and find ways to upskill them to help them achieve it.” Autism Alliance Survey 2020

Low aspiration for autistic jobseekers: Autistic capabilities are often misunderstood, with providers assuming low capability. Deficit-based/ableist approaches have a damaging impact on confidence and self-belief. Placements often don't reflect individual strengths, qualifications, or aspirations. Inappropriate placements fuel disengagement. Autistic people have uneven talents and capabilities. Strengths, challenges and interests need to be understood in order to find an appropriate job-match

“My work aspirations were rapidly diminished, and I was very quickly pushed to do jobs unrelated to my qualification field that didn't match my skills...They had very little understanding of university education, and no connections to professional roles. This prevents young people with disability from future building.” Amaze interviewee 2021

DES is not an autism friendly environment: Autistic informants have reported difficulties navigating multiple and changing points of contact, confusing and arduous paperwork, failure of providers to match engagement styles and mediums to their preferences (e.g. some autistic people prefer information in writing), offices that are difficult to access both in terms of geographic location and for those with sensory processing challenges.

“Disappointed in understanding and inconsistency of disability support agencies. High turnover of staff, not enough time support given.” Autism Alliance Survey 2020

“Chose to leave DES as too hard or not listened to, put in wrong jobs.” Autism Alliance Survey 2020

Compliance and box ticking at the expense of real employment support: An over emphasis on meeting placement KPIs rather than getting best outcome for jobseeker; ‘low value’ training that does not lead to a job; and inadequate ongoing support during employment are recurrent theme from autistic DES participants. Autistic community members have expressed they would benefit from a focus on work readiness: job readiness - so they understand the job requirements before start work; autism accessible recruitment practices (e.g. questions beforehand; clear outline of schedule, expectations); work based training; task analysis and direct instruction on work activities.

“Went to a disability employment agency for 2 years and they showed me all the skills I already had (eg how to use Seek) and nothing more. They made suggestions for unsuitable jobs.” Autism Alliance Survey 2020

“I feel like the first agency did nothing at all in the time we were with them and felt that they were just collecting the money from the government. Second agency, who we are currently with, did not employ appropriate staff and my sons was sent to inappropriate interviews e.g. lawn moving when he does not like loud noises and well as mentioning that he hated gardening with a passion.” Autism Alliance Survey 2020

“Youngest son was with a Disability support network job agency that abused him. They made him sign forms that they provided training, clothes, money, bus and train tickets, driving lessons, car parts, and pick-ups and drop offs. When we found out and put in an official complaint because nothing like this was provided, they said they could no longer support our Son. He didn't know what he was signing half the time, and they told him not to show us.” Autism Alliance Survey 2020

“The support was shocking and the pressure to find a job created a lot of anxiety.” Autism Alliance Survey 2020

“The disability employment service was a joke. They did nothing, not even a hint of job support. They simply ticked boxes for fortnightly meetings and took the money.” Autism Alliance Survey 2020

Weak relationships with employers: A lack of diversity in the types of employers and in the strength of connection to them – particularly for professional roles – linked to DES providers compounds issues with low ambition for autistic job seekers.

“I am interested in coding and being a game designer... it doesn't seem to be the type of job that Job Service Agencies help people find a job in this area.” Autism Alliance Survey 2020

There is also a lack of support for employers, who would benefit from support for identifying what adjustments may be helpful; induction programs that cover the social & transitional elements of work; frameworks to provide role and process clarity and clear and timely feedback.

Weak intersections between NDIS and DES supports. The Australian Government has set a target of 30% of working age participants in meaningful employment by 2023³, up from the recently reported rate of 23%.⁴ Yet only about 14% of autistic participants have work related goals.⁵ A recent study⁶ identified significant room for improvement among NDIS workers to assist participants to build aspirations and actively prepare for work. It highlighted the need to better manage the interface between NDIS and DES noting a lack of understanding about how and when DES should assist jobseekers who are receiving support from the NDIS; and the need for flexibility in meeting participant needs rather than rigid and compliance focussed approaches. Training of the workforce to understand the needs of participants and the pathways to work was identified as a key element of improvement. This poor articulation between NDIS and DES adversely impacts employment outcomes for autistic people.

³ NDIA, Participant Employment Strategy (webpage), <https://www.ndis.gov.au/about-us/strategies/participant-employment-strategy>

⁴ NDIA, April 2021, *Quarterly Report to disability ministers 2020-21 Q3*.

⁵ *ibid*

⁶ Melbourne Disability Institute and Brotherhood of St Laurence (August 2020), “Exploring the Interface of the National Disability Insurance Scheme and Disability Employment Services”, p15

Urgent reforms would yield immediate improvements and inform upcoming redesign

Many stakeholders engaged in the DES redesign work being undertaken by DSS have expressed concerns about rushed consultation timelines together with limited access to evidence and data needed to inform reforms. While Amaze agrees that significant further work is needed to co-design future employment services for people with disability, we urge the Government to progress *three immediate improvement opportunities* to advance outcomes in the short term. These could be commenced within the life of the existing DES program and help to inform the next iteration of employment support for people with disability.

1. Establish a Centre of Excellence in Disability Inclusive Employment Services to build systems capability and evidence-informed approaches. Include a specific autism stream.

A Centre of Excellence in Disability Inclusive Employment Services would provide a much-needed resource to strengthen the capability of all nationally funded employment service providers - DES, jobactive, Transition to Work etc. – to better enable jobseekers with disability. It could incorporate and build upon the current JobAccess initiative. Investment in continuous improvement and sharing what is working across providers and programs would drive a significant cultural shift from the highly dispersed and fragmented approach that currently prevails.

It would be critical that such a Centre could provide nuanced, rather than generic, disability support, to respond to the circumstances of different cohorts. Accordingly, it would need to include **specialised streams – including for neurodivergent and cognitively impaired jobseekers** – to effectively address the specific challenges and enablers of autistic jobseekers. Core elements of the DSS funded Autism@Work Pilot by DXC Dandelion (e.g. assessments; training; tools; help desk) could be instructive, alongside other autism specific employment tools.⁷

Centre of Excellence functions:

- Identify and grow good practice approaches
- Provide advice and support to employment service providers
- Disseminate evidence informed tools and resources for employment service providers and employers (e.g. support for decision making; job carving; job customization; adjustments; on-boarding etc)
- Facilitate communities of practice to assemble and synthesize case studies, foster effective practice and outreach with employers, develop data and evidence, and mobilise networks to maximise opportunities for employment of PwD.
- Quality assure disability inclusion training for the workforces of specialist and generalist employment service providers
- Analyse data and emerging trends
- Foster and support innovations
- Incorporate and build upon the current Jobaccess service

2. Expand eligibility for people with disability to DES regardless of work capacity or eligibility for Centrelink payments

If Australia is to shift the dial on the stubbornly low rate of employment for autistic people, DES eligibility barriers need to be lifted and jobseekers positively encouraged to seek support. While the option to register

⁷See for example: Autism Co-operative Research Centre Integrated Employment Success Tool <https://www.autismcrc.com.au/access/user/register/jiest> and Career exploration tools: mywayemployability.com.au and MyFuture Olga Tenison Autism Research Centre [Autism & the workplace - Communication \(PDF, 1.3MB\)](#); [Autism & the workplace - Sensory sensitivities \(PDF, 1.6MB\)](#); [Autism & the workplace - Simple adjustments \(PDF, 1.3MB\)](#); [Autism & the workplace - Understanding autism \(PDF, 1.0MB\)](#)

as a voluntary jobseeker in the jobactive program currently exists, this light touch support is inadequate for someone facing barriers to employment.

Even a few hours of work each week can make a difference to someone's life. The eight-hour work capacity threshold to access DES services ought to be immediately removed. This would build aspiration and opportunity for economic inclusion and create alternative pathways to ADEs – particularly for NDIS participants.

There are many in the disability community deterred by barriers to accessing Centrelink payments, or getting by with family support, who would benefit from help to secure employment. Relaxing DES eligibility criteria linked to Centrelink payments would extend access to employment support for a sizeable group currently missing out.

An important caveat to our recommended eligibility expansion is that those who take it up must not be subject to punitive or compulsory participation obligations, which risk reinforcing many of the shortcomings of the existing DES system identified by autistic participants through Amaze's consultation.

3. Build the evidence base in areas requiring significant systems change through demonstration projects in:

- **diversions from ADEs;**
- **mutually reinforcing NDIS and employment services supports;**
- **demand side approaches to drive employment in skills shortage areas**

Significant innovation is needed if we are to markedly improve the outcomes employment services are delivering for people with disability and employers. Amaze urges the Australian Government to seize the opportunity to rapidly test and evaluate a range of approaches to identify effective policies and practices to confirm design of future disability employment supports. Priority areas include:

Diversions from ADEs

Open employment normalises disability and is critical to inclusion in mainstream economic and social life. Different approaches to opening mainstream pathways for those who would typically be streamed into ADEs need to be urgently tested and evaluated in collaboration with the NDIA; employment services and the ADE industry. These could build on current pilots⁸ and include:

- Developing higher aspirations among parents, carers, and people with disability through NDIS practice including overhauling School Leaver Employment Support (which could be remodelled with core elements of the Ticket to Work⁹ program)
- Providing comprehensive vocational exploration (assessments, work tasters, work experience etc) before a person is placed into an ADE
- Providing periodic access to vocational exploration for ADE workers and creating provider incentives to support a move from ADEs to mainstream work.
- Exploring alternative employment models including co-operatives and social enterprise models

⁸ E.g. ILC funded project in SA to prepare students in specialist school for further education and careers in open employment

⁹ Information about Ticket to Work is available at: <https://tickettowork.org.au/>

Mutually reinforcing NDIS and employment services supports

The problematic and confusing interface between DES and NDIS services is widely acknowledged by all key stakeholders¹⁰ and in research.¹¹ This adversely impacts autistic people as the major disability group in the NDIS. To lift the poor rates of employment (in open settings) among autistic employment, This interface needs to be seamless, with mutually reinforcing approaches across both systems in a bid to tackle the comparatively poor employment outcomes for autistic NDIS participants. Urgent initiatives are needed to complement the NDIS Participant Employment Strategy¹² and help inform disability employment supports going forward. Effective approaches to building employment aspirations among autistic participants from a young age, expanding mainstream opportunities in the school to work transition, and NDIS funded in-work supports need to be identified for systemic replication. There are some promising innovations that warrant interrogation and potential expansion.¹³

Demand side approaches to drive employment in skills shortage areas

Australia's current skills and labour shortages create a unique opportunity for jobseekers with disability. Low engagement with DES by employers remains a major challenge. There is immediate opportunity for some rapid work with industry and employer bodies to create pathways into high demand areas, leveraging recent government announcements about increased subsidies for employers taking on apprentices / trainees with disability. Amaze's employer-focussed Autism Positive Employment reveals high employer interest in recruiting autistic jobseekers and other with disability.

Well-considered and co-designed systemic reforms need to be developed

Mindful that the timetable for recommissioning of the DES system is likely to be extended given this year's election, the ongoing stakeholder engagement process, and the need for significant further work (in government), the table on the following pages is a summary of Amaze's interim recommendations. We are happy to revise this following release of key government commissioned reports relevant to the review, meaningful data around current system outcomes, and the advancement of work of the DES Redesign Reference Group.

Amaze is committed to informing reforms to employment services for autistic jobseekers

Amaze stands ready to continue to work with the Department and the Australian Government to ensure better employment services for autistic people at this crucial time.

Nicole Rees, Amaze's Deputy CEO and Executive Manager, Policy and Advocacy can be contacted on 0407 337 940 or nicole.rees@amaze.org.au to discuss this submission.

¹⁰ Nicole Rees (Amaze) interviews George Sotiropoulos (DSS) and Jo Collins (NDIA) Autism CRC for the *Unpacking government employment policy* session at the Autism@Work Summit August 2021 [Unpacking government employment policy | Autism@Work Virtual Summit 2021 - YouTube](#)

¹¹ Melbourne Disability Institute and Brotherhood of St Laurence (August 2020), "Exploring the Interface of the National Disability Insurance Scheme and Disability Employment Services", p15

¹² NDIA, 2017, *NDIS Participant Employment Strategy*, p13.

¹³ E.g. Monash ABI / NDIS project; Brotherhood of St Laurence LAC/Transition to Work upcoming pilot

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Summary of interim recommendations for next iteration of employment services for jobseekers with disability. These will be revised following release of relevant data and reports from DSS and further work of the DES Redesign Reference Group.

No.	Interim recommendation	Further explanation
Systems design		
1	<i>A principled approach</i> Establish ambitious principles to underpin employment services for jobseekers with disability	<ul style="list-style-type: none"> • Increase the inclusion of people with disability in mainstream economic life. • All people with disability should have access to employment services regardless of capacity to work or income support. • Employment services is an investment in the capital and capabilities of people with disability, providers, industry and employers. • A strengths-based approach that values the aspirations, talent, skills, and potential contribution of jobseekers with disability must be adopted in all settings. • Co-produced with people with disability and their representative organisations. • Jobseekers' choice and control – including options of specialist or generalist support – must be prioritised.
2	<i>All people with disability eligible for employment support (Immediate priority for action)</i> Remove eligibility restrictions related to work capability and income support status. This will mean any person with disability, regardless of how many hours they work, and whether they receive a Centrelink payment, can access employment services.	<ul style="list-style-type: none"> • Currently a very large group of people with disability – particularly those with autism and/or ID outside DES criteria are impacted by these restrictions. • 8-hour minimum work capacity requirement channels people into ADEs and is a barrier to economic participation. • 30-hour maximum ignores the benefits of specialist supports, even for people with full time capacity. • Centrelink payment requirements cut out sizeable population of people with disability who want to work. • Supports bigger picture objective of getting more people with disability into work. • <i>Must not expand or create any new obligations for mandatory participation.</i>
3	<i>Collaborative network of generalist and high-quality disability specialist providers</i>	Lift the bar for specialist providers: <ul style="list-style-type: none"> - Providers must demonstrate commitment to disability inclusion, including through lived experience across all levels, from Board to workforce.

No.	Interim recommendation	Further explanation
	<p>Situate high quality specialist disability employment service providers as part of an integrated and collaborative employment services system (rather than as a separate system).</p> <p>Enable jobseekers with disability to elect whether to access specialist or generalist providers.</p>	<ul style="list-style-type: none"> - Proficient in evidence-informed cohort specific practice, networks and capacity. - Commitment to community of practice and supporting generalist providers on effective practice. - Collaborations with disability community organisations - Opportunity for specialists to focus on disability cohorts (e.g. Autism, ABI, intellectual disability). <p>Integrated, collaborative employment services system:</p> <ul style="list-style-type: none"> - One integrated employment services system with network of specialist and generalist providers, evolving from the current approach of siloed systems. - Partnerships between specialist and generalist providers. Disability specialists with an explicit role to build sector capability. - Place-based co-ordination of engagement with employers and industry pathway opportunities. <p>Jobseeker choice and agency: Can opt into specialist or generalist employment services (e.g. Transition to Work; next version of Jobactive). Level of support / funding can be adjusted according to jobseeker circumstances / need. Remove eligibility barriers for specialist employment support.</p>
3	<p><i>Centre of Excellence: Disability Inclusion in Employment Services (Immediate priority for action)</i></p> <p>Establish a Centre of Excellence in Disability Inclusive Employment Services to build systems capability and evidence-informed approaches. Include a specific autism stream. This Centre would have a remit to strengthen the capability of all employment service providers (specialist and generalist) and across all employment programs.</p>	<ul style="list-style-type: none"> • Identify and grow good practice approaches. • Provide advice and support to employment service providers. • Disseminate evidence informed tools and resources for employment service providers and employers (e.g. support for decision making; job carving; job customization; adjustments; on-boarding etc). • Facilitate communities of practice to assemble and synthesize case studies, foster effective practice and outreach with employers, develop data and evidence, and mobilise networks to maximise opportunities for employment of people with disability. • Quality assured disability inclusion training for the workforces of specialist and generalist employment service providers. • Analyse data and emerging trends. • Foster and support innovations. • Incorporate and build upon the current Jobaccess service.
4	<p><i>Independent commissioner for employment services</i></p> <p>Establish an independent Commissioner for Employment Services to monitor and report on systemic issues and</p>	<ul style="list-style-type: none"> - Remit across all federally funded employment services. - Monitor and report on systemic issues and identify ongoing improvement opportunities. - Publish periodic data and provide analysis of systems performance. - Annually report to parliament.

No.	Interim recommendation	Further explanation
	outcomes, and identify ongoing improvement opportunities.	
5	<p><i>Encourage open employment (Immediate priority for action)</i></p> <p>Work with the NDIA and employment service providers to test innovative approaches that divert school leavers from ADEs ,and create pathways out of ADEs for existing participants.</p>	<ul style="list-style-type: none"> • Provide comprehensive vocational exploration (through Transition to Work or a specialist employment provider) before a person can work in an ADE). • Provide periodic access (through Transition to Work or a specialist employment provider) to vocational exploration for ADE workers. • Identify incentives for providers to support transitions from ADEs into open employment. • Establish an ILC project in specialist schools for students with a disability to prepare for careers in open employment and further education.
Practice Design		
6.	<p><i>Information to enable jobseeker choice</i></p> <p>Embed in the streaming and onboarding process:</p> <ul style="list-style-type: none"> • a requirement that providers communicate with people coming onto their caseload about any disability needs and accommodations (including sensory accommodations). • A requirement to identify what additional supports should be provided to people who do not speak English as their first language. • A required to inform them of existing specialist providers that are relevant to their condition. 	<ul style="list-style-type: none"> • Jobseekers need good information to exercise agency and choice. • Need to safeguard against gateway providers acting in self-interest. • Consider how Centrelink could better advise about options for those receiving payments.

No.	Interim recommendation	Further explanation
7.	<p><i>Career advice and vocational exploration</i></p> <p>Provide quality career advice and vocational exploration for jobseekers with disability. This individualised support would be designed to enable exploration of skills, interests and aspirations.</p>	<ul style="list-style-type: none"> • Match jobseekers with roles that befit their qualifications, skills and experience. • Foster and enable aspiration. • Provide information on skills and labour shortage / growth areas. • Redresses poor career advice and poor access to work experience for people with disability. • Students with disability need to be supported to secure casual / student jobs and to explore different fields / interests. • Opportunity to make better use of NDIS/SLES supports.
8.	<p><i>Jobseeker centric engagement style</i></p> <p>Empower participants to elect their preferred form of engagements (e.g. in-person, phone or online (video or written communication)).</p>	
9.	<p><i>Providers equipped to use evidence-informed practices</i></p> <p>Equip providers to implement a full suite of options including engaging with employers on:</p> <ul style="list-style-type: none"> • job customisation • on the job support and training (including place and train) • job carving • workplace adjustments based on what is most appropriate for individual participants. 	<ul style="list-style-type: none"> • Centre of Excellence would inform evidence-based practice with specialised advice for different disability cohorts and on intersectional characteristics. • Different jobseekers will require different intensity of supports and adjustments to suit their strengths
10.	<p><i>Parallel support to recruit and employer</i></p> <p>Equip providers to deliver (or engage specialist support) to provide ongoing assistance for both participants and employers, including improved tools and support for employers to assist with on-boarding and integration.</p>	<ul style="list-style-type: none"> • Despite the evidence base for parallel support (for recruit and employer), this is often not provided. • Centre of Excellence would inform evidence-based practice. • Needs to be reflected in case funding. • For NDIS participants, there is a significant opportunity to make more effective use of NDIS supports (e.g. current ABI pilot).
11	<p><i>Individual Placement Support for mental health & wellbeing</i></p>	<ul style="list-style-type: none"> • A high proportion of jobseekers have mental health conditions. Very high co-occurrence of autism and mental ill health.

No.	Interim recommendation	Further explanation
	Expand Individual Placement Support approaches to all jobseekers with disability with mental health support needs, regardless of age. Develop additional referral processes to enable this.	<ul style="list-style-type: none"> • Huge opportunity to increase collaborations between mental health and employment services providers. • Related recommendation to have a mental health practitioner embedded in each provider or establish partnerships between DES providers and mental health organisations. • Build relationships with federally funded Headspace and Head to Health providers.
12	<p>Disability rights</p> <p>Reward practices that reflect Disability Service Standards (and Disability Discrimination Act) by elevating the value of corresponding KPIs.</p>	<ul style="list-style-type: none"> • Specifically DES Program KPI 3, Quality not valued as highly as KPI 1 and 2 (Effectiveness and Efficiency) which relate directly to the Performance Framework and Star Ratings.
Mutual obligations and participation activities		
13	<p>Providers focused on real employment support</p> <p>Relieve providers from having responsibility for the enforcement of mutual obligation requirements.</p>	<ul style="list-style-type: none"> • Evidence shows mutual obligation (particularly in punitive targeted compliance framework) does not support employment outcomes and is doing harm: e.g. exacerbating psychosocial disability. • The monitoring burden on providers impedes their ability to offer support and undermines trust/relationship with the jobseeker. • Enables focus on meaningful employment support.
14	<p>Participation requirements that empower and assist jobseekers</p> <p>Enable jobseekers to nominate the activities, including volunteering, that best advance their aspirations and meet their circumstances. Fully disclose to jobseekers the full range activities and options available.</p>	<ul style="list-style-type: none"> • Builds trust between jobseeker and provider. • Increases jobseeker agency and choice. • Ensures any permitted flexibility is being realised in practice. • Employment outcomes for disabled people, and the success of disability employment services, are hindered by activity testing requirements. • Mutual obligations would be less restrictive and co-designed with job seekers.
15	<p>Preventing payment suspensions</p> <p>Prevent payment suspensions for people with disability until after there has been direct contact from the department to provide support to the participant in understanding and fulfilling any unmet obligations.</p>	<ul style="list-style-type: none"> • Particularly pertinent to jobseekers with cognitive impairment; autism and psycho-social conditions.

No.	Interim recommendation	Further explanation
Outcomes measures		
16	<p>User driven outcomes</p> <p>Introduce user driven measures of outcomes success, which directly influence provider payments. For example:</p> <ul style="list-style-type: none"> • Whether the job outcome was suitable & sustainable • What the participant experience was like • Whether the provider assisted the participant to secure / sustain employment • More highly weighted 52-week work placement payment 	<ul style="list-style-type: none"> • Many people with disability are not translating their post-secondary qualifications into suitable employment – representing significant hit to the nation’s productive capacity • Encourage job matches that are related to qualifications, skills and aspirations, which will reduce the current churn through short-term and labour hire jobs • Policy shift away from a system that incentivises pushing people into any job, to one where the individual participant is helped to find and secure the right job.
Commissioning / provider requirements		
17	<p>Accessible employment services</p> <p>Require all employment service providers to meet accessibility standards (includes physical as well as sensory standards e.g. appropriate lighting and noise control; private spaces; cognitive supports).</p>	<ul style="list-style-type: none"> • Consistent with commitment in Disability Employment Strategy that employment service providers will be accessible. • Implementation focus needs to be on accessibility for ‘invisible’ disabilities due to lower awareness, particularly those relating to sensory challenges (e.g. heightened sensitivity to light, sound, touch).
18	<p>Workforce training</p> <p>Require employment providers to undertake ongoing training and professional development in disability and inclusion. Specialist providers workforces would need to demonstrate advanced proficiency in the cohorts they are working with.</p>	<ul style="list-style-type: none"> • All providers need a base level of knowledge • Specialists would need to undertake additional training in their cohorts • Centre of Excellence would develop and oversee quality standards, ensuring all providers are delivering appropriate support to people with disability.
20	<p>Mental health competency</p> <p>Require employment service providers to have an in-house mental health professional and/or to have a partnership with a community mental health provider.</p>	<ul style="list-style-type: none"> • Reflects prevalence of psychosocial and mental health conditions among jobseekers • May be practical barriers because of limited mental health workforce capacity (e.g. NDIA’s requirements that a Behaviour Support Practitioner (BSP) must oversight Behaviour Support

No.	Interim recommendation	Further explanation
		Assessment & Plans has resulted in incredibly long waits and complexity of 'unregulated' service provision and inexperienced BSPs being employed).
Data collection and monitoring		
21	<p>Useful data</p> <p>Collect and release participation and outcomes data, disaggregated across disability cohorts; provider types.</p>	<ul style="list-style-type: none"> • Currently little useful data is published, which impacts our understanding of how people are moving (or not) through this system and others. • Aligns with our recommendation for an Employment Services Commissioner. • The National Disability Data Asset is potential a complementary reform.
Governance		
22	<p>User voice</p> <p>Embed user voice in governance including:</p> <ul style="list-style-type: none"> • In licensing / commissioning model • Centre of Excellence and Communities of practice to include users • In ongoing advisory groups on operation of employment services system • In advisory group for Employment Services Commissioner. 	<ul style="list-style-type: none"> • Addresses lack of user voice in current system. • Will generate more responsive and effective services. • Potential to pilot this in the current system to move towards co-designed practice, and evaluate the effectiveness of the system from the perspective of job seekers.
23	<p>Avoid conflicts of interest</p> <p>Regulate the practice of DES providers referring participants for services undertaken by entities related to the DES provider (e.g. disclosure; can't be mandatory; need to nominate alternate provider from non-related entity).</p>	<ul style="list-style-type: none"> • Confidence must be built and maintained in the probity of the DES system, ensuring it acts in the best interests of jobseekers. • Limit the risk of perverse incentives for referral to related services (e.g. ADEs; RTOs; health services) • Participants need to have clear information and real choice about their supports and who provides them.