

27 February 2008

Senator J Ludwig
Minister for Human Services
Parliament House
CANBERRA ACT 2600

Dear Senator

Thank you for the opportunity to contribute our thoughts with regard to the Job Capacity Assessment (JCA) process.

We have also appreciated the invitation to participate in related reviews being undertaken by your Ministerial colleagues in relation to the future direction of Disability Services. As you might imagine, extracts of the following have been submitted, either directly or in a similar form, as part of such submissions.

As you may be aware, Bedford is one of the best known disability service organisations in Australia, providing a range of options in supported and open employment, personal support programmes, day activities and accommodation for over 1,600 people with a disability or disadvantage. Consequently, we believe we are well placed to provide valuable insights into issues relating to the application of Government policy.

We trust that the following observations will assist in your review.

While we appreciate the rationale behind the development of strategies to enhance referral and streaming arrangements, there have been and appear to be a number of inconsistencies with the system.

An unintended consequence for DSP (Pension) recipients who seek help from an employment service is that they may automatically trigger a review of their DSP entitlement. This has the potential to cause considerable angst for these people who are typically vulnerable and not willing to take the risk of looking for a job if this jeopardises their income support.

This problem of automatic DSP review acting as a disincentive to job seeking is embedded in the dual function of the Job Capacity Assessment, which refers job seekers to employment services and simultaneously for determining income support.

The dual purpose of the assessment sends a mixed message to prospective job seekers, on the one hand encouraging them to emphasise their work capacity; on the other, their incapacity.

In order to establish specific issues with regard to the JCA process that appear in need of attention, we canvassed the views of a number of our staff who are directly involved in service provision. It should be noted that these matters do not necessarily apply to all JCA agencies across all ESA geographical areas in which we are involved.

We would also make the point that we have enjoyed good working relations with many staff in JCA agencies, as well as associated Government instrumentalities.

The points and suggestions made are designed to build on these existing relationships, address actual and potential shortcomings and further enhance the overall effectiveness of the system.

JCA Resources & Interaction with Sector

- JCA turnover – at times, staff turnover in some agencies has made it difficult to establish and build rapport and ensure agency staff are aware of the scope of services available from providers;
- We would make the observation that there may be a potential source of conflict for providers who are engaged both in the JCA process and providing some form of Government Employment Programme;
- Some JCAs appear somewhat reticent to engage with the sector eg opportunities exist to attend various forums (“PAGES” meetings, for example) and share experiences, address issues etc;
- JCA awareness of disability and programme types – occasionally, staff do not appear to have knowledge of key disability topics and may not be fully aware of the scope of programme offerings – as a consequence, referrals are not necessarily to the most appropriate service.

System/Logistical Issues

- There have been instances where the appointment system has not been interrogated and/or utilised as effectively as it might – eg bookings made into any available appointment irrespective of location;
- Another situation that has occurred relates to a new referral being made without confirming whether the client is attached to a provider - this may be distressing when an outcome is in train and support is removed;
- Up to date contact information for clients has not always been provided.

Outcomes

- Some assessments have been brief and/or not as comprehensive as desired - the consequential impact has been the need for “change in circumstances” reassessments to be undertaken;
- We have received anecdotal comments of dissatisfaction from clients re the JCA process, particularly in terms of awareness of the intent and role of the JCA.

Given the above, we would suggest your review might:

- explore a change in the dual function served per Pension reviews;
- consider ways by which the Job Capacity Account might be expanded into other Programme areas eg DEN services;
- consider lifting the capping on services, to allow greater flexibility and appropriateness of programme choice in the system;
- ensure adequate training and information is provided to JCA agencies; as well, that necessary levels of competency and/or experience are held by JCA staff, with clear guidelines and expectations provided to agencies who are involved in the system;
- ensure necessary communication mechanisms exist for clients re the function and purpose of JCA assessments; and
- review the data base system to ensure the appropriateness and control of referrals.

We understand that a number of these issues may have been raised with Government through representations by NDS and ACE – including default arrangements to Job Network agencies of some people with a disability who would best be served by DEN or even Business Service providers, uncertainty regarding the status/process of referrals to Business Services by JCAs, the dilemma of persons have a pension re-assessment when seeking referral to other agencies per JCAs, problems with school leavers accessing services, and similar.

We would encourage Government to continue to engage the sector prior to any system or policy changes. This will assist providers and clients (and Government) in dealing with the potential conflicts and uncertainties, additional administration and the allocation of resources away from service delivery that may result from any policy changes.

We wish you well in your deliberations.

Should you wish to discuss any matter raised in this letter, please do not hesitate to contact me.

Yours sincerely

Phil Farrow
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