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Royal Society *for*  
the Blind of SA Inc.

29 February 2008

Senator The Honourable Joe Ludwig  
Minister for Human Services  
Parliament House  
CANBERRA ACT 2600

Dear Minister Ludwig

## **Re: Job Capacity Assessment & Job Capacity Account Services**

I refer to your letter seeking views on how the Job Capacity Assessment and Job Capacity Account services can better meet the needs of people with barriers to work, service providers and the Australian community.

The Royal Society for the Blind of S.A. (RSB) is the primary provider of services to people who are blind or vision impaired in South Australia, currently delivering a full range of vision rehabilitation services to over 10,500 South Australians, and shares your belief that all Australians should be able to play a full role in Australian life.

The RSB provides the following open and disability employment services:

- Job Network and Disability Employment Network (DEN) Capped Program contracts with DEEWR; and
- a Business Services Employment contract with FAHSCIA.

In providing comment I do so on the basis of experience with the above contracts.

### **1. Job Capacity Assessment (JCA) Guidelines**

The principles involved in the requirement for Job Seekers to undertake a JCA are agreed with, however the process for people who are in receipt of the DSP (Blind) can be improved, as illustrated below:

- currently PAGES are able to directly register Job Seekers in receipt of New Start, Youth or similar allowance, and refer them to a JCA Provider, by making appointments in the JCA electronic diary. This process works efficiently.
- The RSB is also able to directly register Disability Support Pension (DSP) (Blind) recipients, however we are required in the first instance to refer them to Centrelink who in turn create a referral to a JCA Provider.

There is no apparent reason why the RSB should not be able to directly refer DSP (Blind) Job Seekers for a JCA.

- When attending the JCA interview the Job Seeker is, initially, required to sign an 'authority of understanding' which gives permission to the JCA Provider to review their entitlement to the DSP. This includes DSP (Blind) recipients.

The RSB has a major concern with DSP (Blind) recipients having to undergo a needless review of their entitlement, which has been issued due to their being profoundly blind or having a severe vision impairment resulting in legal blindness that is not able to be treated.

This anomaly is further confirmed when the recipients and/or the RSB Employment Officers who often accompany the client (who in some instances may have a white cane or Guide Dog) are asked by a JCA Provider 'why are we reviewing this DSP?'

### **Recommendation**

The process for DSP (Blind) recipients should be amended to allow Job Seekers to be referred direct to a JCA Provider, and that any reference to an automatic review of their entitlement be removed. This would allow a more seamless service for the DSP (Blind) Job Seeker, and more importantly remove the current frustration and stress experienced by the individual.

## **2. Appropriateness and Range of the Qualifications necessary for Job Capacity Assessors**

The RSB is unable to comment on the actual qualifications of the various JCA Assessors however our Employment Services staff have found them to be generally good.

The Assessors are very receptive when RSB staff have attended interviews, to provide medical explanations on the client's eye condition(s) or acting as their advocate.

## **3. Quality of Information Recorded**

The quality of the information recorded during the assessment process has been found to be satisfactory.

The RSB's Employment Services staff generally find that the client's Treating Doctor's Report, which is provided to the JCA Provider, is normally sufficient medical evidence for the purposes of assessment re work capacity, and referral to our employment service.

**4. Appropriateness of Arrangements to Ensure Attendance at Job Capacity Assessments**

The current requirement places an unnecessary burden on a DSP (Blind) recipient as they must attend both Centrelink and a JCA Provider, as distinct from those in receipt of Newstart or similar allowance.

**5. Key Strengths of the Current Arrangements**

As indicated above, the ability to directly refer persons who are in receipt of an assessable allowance to a JCA Provider enables a smoother process for Job Seekers.

To have a similar process for DSP (Blind) recipients would further improve the process.

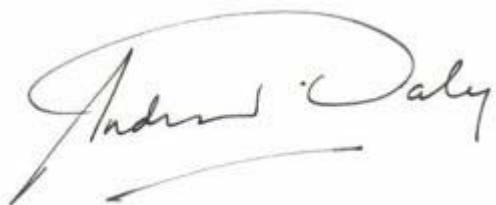
**6. Lessons for the Future**

Prior to the introduction of the current processes on 1 July 2006, DSP (Blind) recipients were able to be referred direct to the RSB by Centrelink Disability Officers, without the need for a referral for a JCA, and the automatic review of their entitlement to a DSP (Blind).

It is therefore suggested that the opportunity be given to consult with specialist PAGES providers such as the RSB prior to any similar amendments to service delivery being implemented.

I trust the above comments and suggestions are of assistance. Should any additional information be required please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Daly', with a horizontal line underneath.

**ANDREW DALY**  
**EXECUTIVE DIRECTOR**