



# Consultation Paper – Transition to Work (TtW) 2022–2027

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## Consultation Paper Response Form

**Guidance:** You are invited to provide feedback to any or all of the questions in the Consultation Paper in the relevant sections below.

Provide your organisation's name and other details as applicable, to assist the department consider your feedback.

Please use the "Consultation Paper Other Feedback" section for any additional comments.

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### Important

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- I agree to the department publishing this submission including personal details (Organisation Name and Contact Name only).
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## Question for feedback – Assessment, referral and eligibility

4.1 What primary risk factors that contribute to young people disengaging from work or education should be used to determine eligibility for Transition to Work services?

Feedback to Question 4.1

The risk factors affecting engagement in work and education for young people are many and varied, including:

- Mental Health
- Self Harm
- Cultural and linguistic diversity
- Living with disability
- Homelessness and tertiary homelessness
- Substance abuse and misuse
- Intergenerational unemployment
- Low education levels
- Criminal justice matters and ex-offender status
- Indigeneity
- Lack of support and social connections
- Sexual and gender diversity
- Victim of crime status
- Sexual and physical abuse
- Domestic and family violence
- Location relative to labour market and training opportunities
- Engagement in high risk behaviours
- Expecting or new parents
- Poverty and low socio-economic status
- Out of home care
- Bullying and harassment
- Lack of access to devices such as phones and computers and internet connectivity
- Lack of access to transport

## Questions for feedback – Maximum duration of service for participants

5.1 What characteristics should be used to determine whether a young person has complex, non-vocational barriers and requires the maximum of 24 months of servicing?

Feedback to Question 5.1

Characteristics that should be used to determine whether a young person has complex, non-vocational barriers and require 24 months include:

- **Homelessness.** Dependent on location and availability of services this barrier can take time to address. In addition, many young people who are couch surfing or staying in boarding house accommodation (secondary or tertiary homelessness) do not initially disclose this barrier as they do not consider themselves homeless.
- **Mental health challenges** may be recurrent and/or fluctuating in severity, taking time to truly stabilise. Again, dependent on location and availability of services, as well as the individual's 'fit' with available support persons, connecting a young person with the right support can take extended periods of time and repeated referrals.
- **Substance abuse and misuse** can be a lifelong challenge for some young people. Young people may present with substance abuse issues but be unprepared to be connected with treatment and counselling services until they feel that use is having a significant negative impact on their lives. Friendship circles, peer pressure and family may also impact a young person's willingness to change their substance use. A lack of available treatment and counselling services also extends the time taken to connect a young person experiencing substance use issues to appropriate supports.
- **Language, Literacy and Numeracy** issues require appropriate education and training to address which can take 12 months or longer depending on the severity of the barrier. Availability of training is also a factor.
- **A history of trauma** leading to disengagement from work, education and training often means that young people are more difficult to engage and take longer to establish trust and rapport with their Transition to Work consultant. Even when trust is established, it can be challenging for these young people to re-engage in an activity that they have previously associated with trauma. These young people often require more intensive support for longer to successfully re-engage in work, education or training.

The commonality of these barriers is that young people experiencing these situations need time to address and stabilise them. Unless these barriers are stabilised, it is unlikely that the young person will be successfully engaged in education, training or employment, and they are likely to require intensive support for longer to remain engaged. BUSY is passionate about delivering long term sustainable employment outcomes, therefore these barriers must be addressed before sustainable work can be genuinely ensured.

## Questions for feedback – Maximum duration of service for participants (Continued)

5.2 In addition to extending the maximum duration of service, are there any other changes needed to support Transition to Work providers in effectively servicing an increased number of young people with complex, non-vocational barriers?

Feedback to Question 5.2

In order to provide appropriate services to each young person, we recommend an assessment of the eligible young person's barriers prior to the end of 18 months of servicing, and clear directions be issued for all providers with regard to when a provider may override the 18 month exit process.

BUSY believes that the opportunity to continue to work with a young person prior to their transition into Enhanced Services is in the best interests of the young person. This is supported by the Transition To Work Final Evaluation Report results that young people are more likely to feel that their needs are understood and that their provider wanted to help with their problems.

## Questions for feedback – Maximum duration of service for participants (Continued)

5.3 What circumstances in a young persons' life should determine whether they are transferred to online services or to an Enhanced Services provider at the end of their service period in Transition to Work?

Feedback to Question 5.3

If non-vocational barriers remain at the end of the maximum Transition to Work service period, young people should be transferred to an Enhanced Services provider.

If young people have completed 18 months of Transition to Work and all barriers are addressed, the young person is likely to be engaged in education or employment but may still be in receipt of benefits. These young people would be better engaged in digital servicing as they require minimal individual support.

## Questions for feedback – Improving attendance at the initial appointment

6.1 Would a mechanism that helps facilitate commencement of young people in the service be desirable?

Feedback to Question 6.1

Yes. BUSY suggests the mechanism involves educating the young person about the service and confirming their contact details, including emails, as well as advising the young person that receipt of benefits is dependent on their attendance at the Transition to Work appointment. This will assist to overcome the identified issue of young people having little awareness of the Transition to Work service when referred from Services Australia.

## Questions for feedback – Improving attendance at the initial appointment (Continued)

6.2 What is your preferred approach to achieving commencement and why?

Feedback to Question 6.2

BUSY's existing practice involves contacting the young person the day before the appointment, introducing our staff and the service and advising what information to bring. Through this method we achieve better than national average results for time to commence in Transition to Work. Given the recognised lack of understanding of the service among many young people, the investment of time prior to commencement to demonstrate the value the service can provide to young people has a direct impact on attendance.

## Questions for feedback – Performance Framework

7.1 What elements should the Department use to measure achievement of Education Outcomes?

Feedback to Question 7.1

**BUSY recommends that the Department measures the proportion of education outcomes achieved**



for Year 10/11/12, Certificate III and above and/or SEE study, against the caseload currently enrolled in education, on a quarterly basis.

The addition of Education Outcomes for completion of Certificate I or II would acknowledge the contribution this milestone has on improving a young person's work readiness.

## Questions for feedback – Performance Framework (Continued)

7.2 How should the Department seek to ensure job seekers and employers are receiving quality of service from Transition to Work providers?

Feedback to Question 7.2

We encourage the Department to undertake participant surveys and employer surveys. BUSY currently undertakes these internally for its own quality assurance.

BUSY supports Account Manager assessment of service quality utilising a standardised method for assessment.

Providing job seekers and employers with visibility of provider performance would enable better insight to service quality.

## Questions for feedback – Performance Framework (Continued)

7.3 Are there any other meaningful measures that could be included in the Provider Performance Framework?

Feedback to Question 7.3

**BUSY recommends the following measures form part of the Transition to Work Provider**

#### Performance Framework:

- Community linkages and/or referrals to external service providers, recognising the collaborative efforts that have contributed to the success of the program so far;
- Provider visibility on performance in relation to individual providers rather than the national average, to allow further collaboration between providers to deliver better services to young people;
- Consideration of regional versus metropolitan locations, acknowledging the differences in availability of employment, education and training opportunities in each location type; and

More frequent performance discussions with the Department to enable timely adjustment to service delivery to more efficiently improve performance.

### Questions for feedback – Performance Framework (Continued)

7.4 What improvements could be made to the current review and allocation of the Funded Places process?

Feedback to Question 7.4

**Providers would benefit from a more in-depth understanding of the existing and future review and**

allocation process, including visibility on existing and proposed formulae for determining funded places.

## Questions for feedback – Performance Framework (Continued)

7.5 What factors should the Department account for when determining Funded Places?

Feedback to Question 7.5

The Department should consider:

- Provider performance;
- The local labour market;
- Number of eligible young people;
- Level of disadvantage within the region; and
- Barriers of the cohort.

## Questions for feedback – Performance Framework (Continued)

7.6 How might performance be benchmarked in the new model?

Feedback to Question 7.6

Given that Transition to Work has matured and been evaluated as an effective program,

performance could be more accurately benchmarked against previous Transition to Work performance rather than against jobactive or Employment Services. This recognises the significant differences between the two models.

Performance against a regional average rather than a national average may provide better accuracy taking into account the differences in availability of supports between regions.

## Question for feedback – Youth Advisory Sessions

8.1 Is there anything that the Department should change or improve in the way that Youth Advisory Sessions are currently running?

Feedback to Question 8.1

Recognising that the Department is promoting Youth Advisory Sessions, initial uptake has been low.

Young people in digital servicing would benefit from being required to attend these sessions if they have been unable to find employment within the first six months of their digital service.

Questions for feedback – Other Service Settings to improve outcomes

9.1 Is there anything in the Transition to Work program that should change in order to have the right balance between ensuring national service standards are maintained, while also allowing providers the flexibility needed to enable local collaboration and engagement in their communities?

Feedback to Question 9.1

BUSY believes that the program itself provides the necessary flexibility to provide adequate support and community collaboration in its existing form. The Department's suggested enhancements to quality monitoring processes will reflect the level of maintenance of the national service standards.

In a broader context, providing a place in Local Jobs and Skills Taskforces specifically for Transition to Work providers will ensure young people's needs are better met through Local Jobs Program activities in all regions.



9.2 What role can the Transition to Work service play in ensuring that young people are engaged in the design and delivery of policy and services?

Feedback to Question 9.2

The inclusion of places for Transition to Work service providers in DESE taskforces such as the Local Jobs and Skills Taskforces would enable providers to engage with participants in targeted discussions on policy and service design and delivery, and more accurately represent their views as a distinct cohort separate from general employment services participants.

Questions for feedback – Other Service Settings to improve outcomes (Continued)

9.3 Is there anything in the current service settings that might be seen as limiting youth engagement?

Feedback to Question 9.3

While there is nothing specifically limiting youth engagement within the service, increasing young people's awareness of the program would increase engagement of at risk young people.

Questions for feedback – Other Service Settings to improve outcomes (Continued)

9.4 What do you think constitutes best practice with regard to supporting the mental health of participants in an employment service and how do we improve the ability of the service to deliver to this standard?

Feedback to Question 9.4

Best practice support includes providing opportunities for young people to disclose mental health concerns and ensuring that if disclosed, the young person can be quickly connected with a mental health service with the assistance of their Transition to Work provider. At a program level, Transition to Work providers should be required to ensure timely access to a counselling service for affected young people.

9.5 What are appropriate servicing strategies or principles in situations where there are longer waitlists for specialist services, in contrast to locations where there are readily available specialist mental health services?

Feedback to Question 9.5

The establishment of a national youth mental health support service for all Transition to Work participants would support timely access. In locations where there are minimal existing services available, support to access tele-health mental health support.

9.6 What are the features of a service that acknowledges the significant mental health challenge across the youth caseload and embeds appropriate responses into the default service offer, including by addressing particular issues such as disclosure and stigma?

Feedback to Question 9.6

The default service offering should ensure initial appointments provide young people with information about mental health, educate them on the benefits of mental wellbeing and the prevalence of mental health issues in our society to de-stigmatise this significant issue. Where a mental health issue is disclosed, the service should facilitate timely access to appropriate mental health support.

BUSY At Work welcomes the opportunity to provide a response to the Transition To Work 2022-2027 Consultation Paper.

As one of Australia's highest performing Transition to Work providers since the inception of this important program, the depth and breadth of The BUSY Group's services, contracts and experience assisting young people to access and succeed in education, training and employment ensures that BUSY is well placed to provide informed and evidenced feedback on the proposed changes to Transition to Work.

Some relevant achievements informing our understanding include:

- Providing Transition to Work services since 2015, including a significant and rapid scale up as a result of the COVID-19 pandemic in 2020, while retaining our position in the top 20% of providers nationally;
- Rolling TtW sample results with no nonconformances as recently as April 2021;
- The highest-performing jobactive employment service nationally;
- Assisting over 350,000 apprentices and trainees and over 60,000 employers to engage in the apprenticeship system across Australia through the Australian Apprenticeship Support Network;
- In excess of 85% employment outcomes for employer-led, customised skills and training programs; and
- 100% compliance in delivering Australian Government contracts.

In alignment with the Australian Government's own evaluation of the Transition to Work service, BUSY At Work's tailored, flexible and industry demand-driven practices across its youth programs demonstrate that successful service is dependent on:

- Positive engagement and respect for each young person's unique strengths, goals, needs and experiences and understanding the circumstances surrounding their lives;
- Genuine local community engagement and collaborative responses to issues affecting local young people;
- High level and in-depth engagement with industry and employers to fully understand their employment and skills needs;
- Understanding current, changing and emerging labour markets and the ability to design and deliver innovative pathways for young people to forge careers; and
- Appreciation of the profound changes that can be made to young people's lives through the delivery of Transition to Work services, and the positive changes these young people go on to make in their communities when they leave our service.

## Transition To Work beyond 2022

Transition to Work is a highly successful program that provides more than just a job or qualification to a young person. The flexibility afforded to providers has enabled the program to build young peoples' employment capability, motivation and confidence, leading to outcomes that are likely to reduce welfare dependency, strengthen communities and foster a new generation of empowered and effective citizens.

BUSY recognises the importance of extending the success of the current program through expansion and innovation. The expansion of the TTW service will provide more young people with the opportunity to access a specialist employment and career service that is designed by and for them and delivered by staff who are dedicated to bettering young people's lives.

As an innovative organisation dedicated to young people for more than 40 years', BUSY is ready to support more young people than ever before.

## About BUSY

BUSY At Work is part of The BUSY Group, a national organisation delivering education, employment and training services to thousands of people across Australia.

The BUSY Group also includes disability services provider BUSY Ability (formerly On-Q), Skill360 Australia group training and registered training organisation and The BUSY School special assistance schools.

Employing over 500 staff across Australia, with a presence in every State and Territory, The BUSY Group has grown from its inception as a not for profit organisation in 1977 on the Gold Coast (Backing Unemployed Southport Youth) to become a large provider of innovative supports from over 50 locations.

## An Experienced Employment and Associated Services Provider

Current programs delivered by The BUSY Group include:

- Transition to Work
- Youth Jobs PaTH (Prepare, Trial, Hire) Industry Pilots
- jobactive
- Career Facilitators for Industry Training Hubs
- Australian Apprenticeship Support Network services
- Disability Employment Services
- Skills Checkpoint for Older Workers
- National Disability Insurance Scheme
- National Disability Coordinator Officer Program
- Parliament and Civic Education Rebate (PACER)
- Commonwealth Scholarships Program for Young Australians
- Victorian Apprenticeship Field Services
- Victorian Early Childhood Scholarships and Incentives Program
- Skilling Queenslanders for Work projects
- The Outback Queensland Education Experience Program
- The Great Barrier Reef Education Experience Program
- Community Housing (Queensland)
- Registered Training Organisation 1607
- Group Training Organisation
- Licensed Labour Hire services
- The BUSY Schools, non-state special assistance schools (Queensland)