



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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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

YouthWorX NT believe that the following primary risk factors should be used to determine eligibility for Transition to Work (TtW):

- Mental health challenges and episodic nature of psychosocial disability
- Undiagnosed or diagnosed disability (this would require additional structural changes and formal inclusion of young people with a disability within TtW's scope and would require providers to access the range of supports and incentives that DES currently offer such as wage subsidy and other necessary supports [i.e., Auslan and Hand Talk Interpreters, captioning, assistive technology, and workplace modification] to go to work)

YouthWorX NT refers to:

- the [United Nations Convention on the Rights of Persons with Disabilities](#) (CRPD), specifically articles 24 Education and 27 Work and Employment where Australia is a signatory for participation on an equal basis with others; this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive, and accessible to persons with disabilities
 - The 'new' National Disability Strategy 2021 - 2031 (to be launched in December 2021) where mainstream employment services will have an obligation and responsibility to provide services to people with a disability within the new national outcomes' framework as an evaluation mechanism for Government to the UN CRPD
- Young people linked to statutory services including the Office of the Public Guardian NT or Territory Families, Housing and Communities, those transitioning from care and young people connected to or transitioning from youth justice orders or settings
 - Young people experiencing or at risk of experiencing homelessness (including those young people couch-surfing), and/or domestic or family violence
 - AOD abuse/addiction
 - Young people who have disengaged from school for reasons that include but are not limited to bullying, cultural issues, financial restraints and/or social-emotional and mental health issues. TtW also needs to be an exit point in consultation with the school well-being team and careers team
 - Aboriginal and Torres Strait Islander young people
 - Newly arrived young people and young people from CALD backgrounds
 - Young people with family responsibilities that prohibit or limit their ability to find or sustain employment, or engage with education
 - Young people with no personal identification

YouthWorX NT believes that young people should also be able to self-refer where they identify significant barriers to gaining employment but are motivated to pursue education and employment goals.

Overall, we welcome the proposed expansion of TtW eligibility to include those with complex non-vocational barriers that contribute to disengagement from education and employment.

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

YouthWorX NT considers that providers should have the flexibility to determine which young people require the maximum 24 months of servicing. This would allow providers to tailor servicing to accommodate the changing needs of each individual young person, which can substantially vary during their time with the service. This would consider a young person's ability to access some specialist supports such as mental health services, which often have long waiting periods. Applying an individual case approach along these lines could be supported by departmental guidelines and assessment tool(s) that are culturally safe and appropriate. In some cases, professional diagnoses (e.g., for psychosocial, neurodiverse and disabilities defined by the Disability Discrimination Act 1992 or the International Classification of Functioning, Disability and Health,) could contribute to this assessment using a human rights framework.

YouthWorX NT supports the utilisation of the JSCI to determine eligibility and the length of service a young person requires. These are the factors we would ask are considered in the administration and application of JSCIs:

- providing young people with an explanation and reassurance about the purpose of the JSCI
- providing young people with assurances about privacy of their disclosures
- an option to be supported by a youth worker or trusted support when filling in the JSCI
- Inclusion of questions about:
 - geographical isolation, social isolation, and internet connectivity
 - the length of time a young person has been disengaged from education, employment and training.
 - assessment for a disability and any 'reasonable and necessary' (reasonable accommodations) to support and enhance participation 'on the same basis' as other young people without a disability.

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

It should be necessary for TtW providers to demonstrate that they are embedded in their local community, with strong referral partnerships with local, state and federally funded support services. These services include those specialising in support around homelessness, AOD, family/domestic violence and youth justice and community services. In addition, providers should have collaborative mechanisms for engaging with local employers, peak industry bodies and mainstream services such as schools, VET/training providers, tertiary providers, and health providers.

This collaborative, relational approach is required to holistically harness the resources, expertise, and services necessary to support young people with complex non-vocational barriers.

Providers should ensure all staff receive the adequate training and /or should employ a dedicated staff member with relevant qualifications to support young people with complex non-vocational barriers.

TtW providers should also be enabled to facilitate a referral for an Employment Self-Assessment with a Centrelink Social Worker for reclassification, in addition to being able to update a young person's JSCI.

The requirement for young people to participate in 25 hours of activities should recognise activities that contribute to a young persons' health and well-being that leads to work readiness rather than just work readiness. This could include activities that are being undertaken in other services and recognised as an important part of work readiness and a young person's employment plan.

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

YouthWorX NT believes that young people's capability and choice should play a primary role in determining whether they are transferred to online or enhanced services at the end of their TtW service period.

Other important factors that should be considered include:

- young people's access to their own computer, phone, and reliable internet; and
- young people's access to a locally available Enhanced Service Provider.
- Digital literacy and capacity for self-directed learning and job search activity
- Safety in online environment.

Young people with ongoing complex needs should have the option of staying with TtW. This option would be for young people who are engaging with the service and are making progress towards their work readiness. We strongly believe that online servicing for this cohort is likely to be inadequate and could undo progress made in TtW.

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

YouthWorX NT believes that a mechanism that helps facilitate commencement of young people in the TtW service would be desirable. We agree that this would encourage those who do not have adequate information about the service to attend their initial appointment and start their journey with TtW.

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

As an overarching measure, we believe that TtW as a national service could be more clearly defined and marketed to young people and their families/carers. National marketing and engagement strategy that includes advertising and communication material. This would provide young people with a greater depth of understanding around the service and its benefits and therefore increase the likelihood of them attending their first appointment. Marketing materials and campaigns should be co-designed with young people, parents/families, TtW providers and Centrelink.

Our preferred approach for achieving commencement is an incentive-based approach, however if temporary suspension of income support is utilised as a mechanism to increase commencement, we believe that it is essential that:

- any income suspension should be temporary and able to be quickly and easily lifted when young people attend;
- exemptions should be enabled for young people who make contact but are unable to attend due to reasonable circumstances (e.g., sickness or family responsibilities);
- young people should also have adequate warning before any suspension of payment is enacted; and
- this mechanism does not contribute to or enhance young people's disadvantage.

Questions for feedback – Performance Framework

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

Feedback to Question 7.1

Young people need to develop the foundational and transversal skills that will support them to find and sustain

employment (i.e., those that are valued by employers) and that can be applied to contribute to their relational and everyday contexts. Core skills are an important foundation for young people, particularly those who are experiencing disadvantage, to progress ongoing learning and participation throughout their lives.

YouthWorX NT believes that the Department should consider measuring both progressive educational measures as well as outcome measures. This is particularly critical with the expanded inclusion of disadvantaged cohorts with complex non-vocational barriers.

Progressive measures should include participation and or completion of Certificate I and II and pre-apprenticeship courses, as well completion of skill sets and structured workplace learning experiences, particularly when these courses are linked to industry and employment placements and experiences. Participation in these courses are important for training, an articulated VET pathway for success in learning and career exploration for young people and are important re-engagement and success milestone for young people experiencing disadvantage.

It is also critical that young people are encouraged to combine work and learning so that they can continue to build their capabilities. As such we would strongly recommend that Certificate II completion is recognised as contributing to a Hybrid outcome. YouthWorX NT refers to the [UN International Measurement Tools](#) to better understand what drives economic growth, to assess the long-term sustainability of a country's development path, and to measure the output and productivity performance of the educational sector.

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

In addition to meeting outcome, sustainability and KPI targets, additional measures could include periodic surveys that are co-designed with employers and young people.

For young people surveys should include measures around:

- capability development
- agency in decision making
- vocational guidance
- involvement in service design/delivery and timeliness

For employers, surveys should include measures around:

- level and quality of engagement between employers and TtW provider
- Preparedness of young people

Mechanisms that allow employers and young people to contribute to service design and delivery should also be considered; regular departmental visits to providers and employers would enable the collection of 'on the ground' feedback.

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

In addition to the measures outlined above, additional measures could include:

- number of young people participating in career exploration (e.g., work experience or work tasters);
- types of opportunities offered through Provider engagement with industry and employers and engagement in these activities;
- young people's engagement and participation in activities linked to their plan, including activities related to non-vocational barriers;
- activities and performance of collaborative mechanisms with key stakeholders in the local community supporting the growth of employment pathways for young people;
- placement benchmarks; and
- internships.

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

- For providers to plan effectively to manage resourcing and budgets, we believe that Annual Funded Places should be reviewed every six months, rather than quarterly. AFP should be allocated in consultation with the provider to ensure the process is transparent, and to enable the provider to contextualise the utilisation.

Questions for feedback – Performance Framework (Continued)

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

Feedback to Question 7.5

As a number of young people in Post Placement Support will not be on the active caseload in ESS, TtW providers should be consulted about their total caseload. This disparity in numbers naturally impacts utilisation.

Questions for feedback – Performance Framework (Continued)

7.6 How might performance be benchmarked in the new model?

Feedback to Question 7.6

YouthWorX NT supports a combination of up front, bonus and outcome payments that allow initial investment for providers to service disadvantaged cohorts with smaller caseloads. This model allows providers to work intensively with young people to identify training and education opportunities and to help them to develop the skills and attributes employers are looking for. We agree the funding model should be weighted more to service fees than Outcome Payments and gives equal value to Employment and Education Outcomes is critical to supporting young people experiencing disadvantage. Local labour markets and location-specific access to relevant and related education and training opportunities should be taken into consideration when assessing performance. For example, nationally there appears to be limited understanding of the concept of 'thin markets' in the NT and limited access to appropriate training providers.

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

These are our suggestions to improve the take up of and access to YAS:

- To ensure at the point of referral that a young person has digital literacy and capacity for a successful outcome.
- Direct marketing to young people about the YAS should be sent from the local TtW provider in collaboration with the Department.
- TtW providers being able to manually refer and book YAS sessions.
- Maintain current funding to allow continuation of a flexible individualised approach to the sessions based on the needs of the young person and delivered by a youth coach with career guidance and development expertise when required.
- Possibility of an initial YAS being mandatory with the young person then deciding whether they would like to use the remaining two.

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

As a member of the National TtW Community of Practice (TtW CoP), we believe that the place-based mechanism of Community Investment Committees (CICs) should be a core part of the TtW model. We see the enabling of local collaboration in communities as core work of TtW and a critical part of achieving improved outcomes for young people.

Local CICs bring together representatives from industry, VET, community, all levels of government and employment services to develop locally specific solutions to meet the needs of young people and local business. We believe that TtW providers should be mandated to develop and coordinate CICs, enabled by the National Youth Employment Body (NYEB).

Running parallel to the Local Jobs and Skills Taskforce in each region, the NYEB would enable CICs to provide a community-led, youth specialist response that aligns existing investments in a region and facilitates coordinated and collaborative supply and demand side responses to youth employment.

Findings from the National Youth Employment Body, led by the Brotherhood of St Laurence, show that the coordination of a local CIC by the TtW provider leads to:

- Increased collaboration with employment and support services, employers, government and training providers to co-design local training and employment pathways
- Improved understanding of and engagement with local growth industry sectors
- Improved capacity to adapt and innovate strategies to support young people, through increased access to and mobilisation of labour market data, multi sector expertise, local investments, and networks.
- Increased connection and exchange of local and national knowledge, including participation in the Local Jobs and Skills Taskforce
- Increased local and national understanding of the barriers and enablers to quality youth employment and the implications of this for local economic development.
- Increased community willingness to build relationships with providers and invest in the capabilities of young people.

Additionally, we see the opportunity for more streamlined and efficient contractual requirements as they relate to the intricacies of ESS administration.

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

YouthWorX NT believes that youth participation is essential to the delivery of quality services for young people. In its facilitation of a youth Leadership Academy, established in 2016, the organisation provides young Territorians with meaningful opportunities to directly participate in the services designed to support them through co-design. It is fundamental to develop an inclusive culture, foster trust and build confidence that young people are a valued member of community.

The Leadership Academy is a mechanism to authentically engage young people and embed their voice by providing leadership opportunities to contribute to service design, service delivery, community engagement and local and national policy advocacy. The Leadership Academy empowers its young members to collaborate with their peers, inspiring and mobilising themselves and others towards a common purpose and to effect positive change.

YouthWorX NT strongly advocates mechanisms to harness young peoples' engagement in the design and delivery of policy and services should be demonstrated in a youth participation plan, and could include support to:

- Participate in a locally developed youth participation group such as a youth alliance or youth advisory group such as YouthWorX NT's Leadership Academy;
- Share their employment pathway and experiences with other young people, employers, training providers and other key stakeholders in the employment system, through forums such as video, social media, and information sessions.
- Participate in activities to build leadership capabilities.
- Engagement with Elders group/ cultural advisory authority to inform/contribute to the TtW journey for young people who are Aboriginal or Torres Strait Islanders.

Given the proven success of our Leadership Academy as a mechanism for harnessing young people's voice and agency locally, we believe that the Department should also consider resourcing the establishment of a National Youth Advisory Group. This could be facilitated through the NYEB and would enable young people to contribute to:

- service development, design, and refinement, through lived experience perspectives;
- development of strategies and programs at local, state and national levels;
- key decision-making groups e.g., to the Community Investment Committee, Local Jobs and Skills Taskforce, organisation boards and NYEB Governance Groups; and
- round table discussions at policy level.

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

Feedback to Question 9.3

The current TtW service offer is limited to Jobactive boundaries and prohibits young people in our Darwin rural area from accessing our service. The rural area begins on the fringe of Palmerston (25km from the Darwin CBD) and becomes the responsibility of CDP administered by NIAA. Young people who reside in the rural area are referred to CDP via DHS only - there is no ability for direct referral. This being the case, young people in this cohort fall through the gap and are not eligible for any servicing at all. Many young people in the rural area are not Indigenous however this is not a stipulation but a priority cohort for CDP.

Our solution is to implement '50km Grey Zone' between DESE and NIAA employment service providers. This would enable appropriate choice and control for young people to register with the right service to meet their employment needs. Through a partnership arrangement between TtW and CDP it would also provide the opportunity to streamline referrals using a throughcare approach for warm handovers so that no young person is left behind on their journey to employment and adulthood.

This boundary/service region issues between the two Australian Government Departments, DESE and NIAA is relevant to Darwin, Alice Springs, Cairns, Mt Isa, and parts of WA.

We also see access to transport as a key barrier for young people's engagement in training and work opportunities. Limitations include:

- Public transport: cost; availability; schedules that are not aligned to the timing or location of education opportunities; opportunities that may not be on a public transport route (e.g., locally, to the East Arm industrial precinct).
- No access to finance, a car or licensed individual to gain the hours of experience needed to gain a driver's license which excludes a young person from opportunities that ask for applicants with a license and/or car. Additional resourcing would enable TtW services to implement driving lesson programs, or to provide tailored responses to transport young people to opportunities, such as hiring a bus.

Other limitations include:

- the eligibility criteria; and
- cultural or family responsibilities
- Digital literacy, limited access to data e.g., unable to take/make calls on mobile

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

Welcome focus on mental health and its link to employment. Increasing mental health issues experienced by young people during the pandemic is of great concern amongst TtW providers

Best practice includes adoption of capabilities informed practice such as Advantaged Thinking and coaching which holds high aspirations for young people and provides young people with agency and choice over decision making

Enabling flexibility in engagement and participation requirements for young people

Individualised Placement Support (IPS) is a promising program that could be trialled within TtW services or in collaboration with partners. IPS 'provides individualised support to meet the needs of people with mental illness who are seeking to gain or remain in employment' (KPMG Consulting 2019, Final report for the evaluation of the Individual Placement and Support Trial, Department of Social Services, Canberra, p.i).

A recent review of different disability employment interventions found 'evidence for a beneficial effect of IPS compared to traditional vocational rehabilitation or other control condition on open employment outcomes' for people with psychosocial disability (Kavanagh A, Brown D, Dickinson H, Mallett S, Marck C, Weld-Blundell I. 2021, Economic Participation and Employment - Summary Report, The University of Melbourne, p.27).

KPMG's evaluation of IPS implementation in headspace sites across Australia also found that the program (modified to include an education component) 'improved the vocational education and employment outcomes for trial participants, with around 43 per cent of all participants achieving an education or employment outcome' (KPMG 2019, p.65).

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

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

- Investment in training and resources that are co-designed with mental health providers, young people and TTW services
- National rollout of training working with young people with mental health challenges
- Investment in staffing with specialised qualifications
- Mechanisms which enable sharing of best practice
- Collaboration with mainstream providers to avoid duplication of service offers and best practice in ensuring intersecting and working together.

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

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

- **Employment plans that include positive health and wellbeing planning**
- **Youth specialist providers**

If there are any comments you wish to provide that are not already captured, please provide them below.

Feedback to Consultation Paper - Other