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20 December 2011

The Committee Secretary
House of Representative Standing Committee on Education and Employment
PO Box 6021
Parliament House
CANBERRA ACT 2600

Dear Secretary

House Standing Committee on Education and Employment: Inquiry into mental illness and workforce participation

On 14 October 2011 representatives of the Commonwealth Ombudsman's office gave evidence to the Committee's inquiry into mental illness and workforce participation.

At that hearing Committee members asked Ombudsman staff if they were able to provide information about the progress made by agencies in implementing the recommendations included in the Ombudsman's *Falling through the cracks* report. It was agreed that our office would approach the Department of Human Services (Centrelink) and the Department of Education, Employment and Workplace Relations (DEEWR) to obtain their agreement to our office providing existing update reports to the Committee, and would invite them to provide us with any additional information that might be relevant to the Committee's inquiry.

Centrelink has consented to us providing the Committee with a copy of its June 2011 update to the Ombudsman regarding the recommendations made in the *Falling through the cracks* report. Centrelink also provided us with another document, outlining the further progress that had been made since the June 2011 advice. Both documents are provided as attachments to this letter.

DEEWR requested that we not provide the Committee with a copy of its July 2011 update to the Ombudsman regarding the *Falling through the cracks* report. DEEWR is preparing a table of updates in response to a question on notice from Senator Wright about the progress made on the *Falling through the cracks* recommendations and told us that, once cleared by the Minister, it would make the response available to the Committee.

I am now the Senior Assistant Ombudsman with responsibility for the office's work in this area. Please feel free to contact me if you consider that this office might be able to provide further information that would assist with the current inquiry.

Yours sincerely

Helen Fleming
Senior Assistant Ombudsman



Australian Government



CENTRELINK FINAL REPORT

Commonwealth Ombudsman—*Falling through the cracks*—engaging with customers with a mental illness in the social security system

24 June 2011

This report outlines Centrelink's progress against the recommendations of the Ombudsman's Own Motion Investigation: *Falling through the cracks - engaging with customers with a mental illness in the social security system*.

Centrelink recognises that many people with mental illness participate in the community and employment but at times find it difficult to engage with the social security system.

Providing services sensitively to people who have a mental illness is a high priority and Centrelink has invested, and will continue to invest, significant effort in improving service delivery to these customers.

In November 2010, an Interagency Working Group was convened comprising representatives from Centrelink, the Department of Human Services (DHS), the Department of Education, Employment and Workplace Relations (DEEWR) and the Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) to progress the Ombudsman's recommendations.

This Group worked collaboratively to address most of the recommendations in the Ombudsman's Report however it was agreed that further consultation would be needed to address the more complex recommendations - in particular recommendations 1, 7, 9 and 10.

Centrelink has convened a Working Party comprising key organisations and individuals from the mental health and disability sectors. (Refer to Attachment A – Membership List)

The Working Party's initial focus is on progressing the more complex recommendations outlined in the Ombudsman's Report (Recommendations 1, 7, 9 and 10) and will later be expanded to help identify broader options to improve service delivery for people with mental illness.

An initial teleconference was held on 7 June 2011 where members provided feedback regarding these more complex recommendations. Actions to be followed up from this teleconference have been included within this report under the corresponding recommendations.

Centrelink has also distributed an online survey to Working Party members and is currently collating responses. The survey focuses on identifying options to address the more complex recommendations outlined in the Ombudsman's report. (Refer to Attachment B – Survey – Improving service delivery for people with mental illness)

When survey responses are collated and analysed, Centrelink will work with representatives of the mental health and disability sectors to develop an Action Plan to address the concerns and progress suggestions raised within the survey.

From 1 July 2011, Centrelink becomes part of the Department of Human Services (DHS) which will consist of the central department, Centrelink, Medicare Australia, the Child Support Agency, Australian Hearing and CRS Australia.

Below is an outline of actions undertaken by Centrelink against each recommendation.

Recommendation 1

Centrelink and Employment Service Providers (ESPs) should expand their existing service delivery procedures to require staff to consider whether a customer's mental illness necessitates a particular outgoing communication strategy.

Centrelink's progress

From 1 July 2011, all Job Capacity Assessments for Disability Support Pension (DSP) customers and Employment Services Assessments for disadvantaged job seekers will be delivered by health and allied professionals within the Department of Human Services. This will allow for an expansion of existing 'walk-in' referral procedures that can be beneficial for customers with mental illness who do not have a pre-arranged appointment. This change recognises that some customers with a mental illness may be more effectively serviced when they walk into a Centrelink Customer Service Centre (CSC) rather than having an appointment arranged for a later date. From 1 July 2011 e-Reference procedures will be updated accordingly.

From 20 June 2011, Centrelink will be expanding existing SMS text messaging reminders to customers who provide updated mobile phone and/or e-mail address details. These messages can be used to remind customers of Centrelink appointments, or of information that they may need to provide to progress a claim or decision. Appointment reminders are helpful to ensure people understand and meet any participation requirements or assessment interviews, and other reminders can assist them to provide information that is needed to complete claims, reviews or other decisions in a timely way. Customers may 'opt out' of this service if they choose.

The disability and community sectors have been engaged through the Working Party to progress further improvements to outgoing communication.

Recommendation 2

Service delivery procedures should be updated to reflect that, where a special contact arrangement is implemented for a customer with a mental illness, the customer must be made aware the arrangement is for their benefit and can be revisited if they find it is unnecessarily restrictive or unhelpful.

Centrelink's progress

The Centrelink Alternative Servicing Arrangements policy is being reviewed with the intent of developing a DHS portfolio-wide policy. The scope of this review will include recommendations from the Ombudsman's Report *'Falling Through the Cracks'* and the Centrelink Customer Aggression Audit June 2010. Once a draft policy is developed stakeholder consultation will commence, including with the Ombudsman's Office. As part of the implementation of a reviewed DHS policy, existing documentation, including e-Reference files will be updated.

Information regarding nominee arrangements was included in the March 2011 Pulse e-newsletter for Disability Support Pensioners, their families and carers.

As a result of feedback from the initial teleconference of Working Party members, Centrelink will strengthen messaging around peer advocates in reference procedures and will explore the notion of an 'engagement plan' to help customers and carers interact with the social security system.

Recommendation 3

Centrelink and DEEWR should expand existing service delivery procedures to require that, where staff identify a customer's mental illness may prevent them from adequately pursuing a beneficial course of action, the customer is provided with additional services by way of advice, support or referrals.

Centrelink's progress

Job Services Australia (JSA) providers have access to the Employment Pathway Fund which may be used to address a customer's vocational or non-vocational barriers to employment, including for the purchase of mental health services such as Cognitive Behavioural Therapy. DHS Assessors will identify where these interventions may be beneficial and make appropriate recommendations in their reports.

In April 2011, Centrelink updated reference procedures to ensure Customer Service Advisers (CSAs) consult with senior and experienced staff where a customer with mental illness lacks insight into their condition.

Centrelink implemented special procedures to assist small groups of vulnerable people with suspected mental health conditions who are likely to be qualified for Disability Support Pension (DSP) or eligible for a significant reduction in their participation requirements. In limited circumstances, these procedures allow a person's eligibility for DSP to be determined based on medical conditions diagnosed solely by a Centrelink registered Psychologist. These exceptional procedures apply only to people who are unable to be effectively assessed through normal channels, because they are disengaged from the health system, or do not acknowledge the impacts of their condition on their capacity to work or comply with requirements. This was introduced in two phases, from:

- December 2009, to assist people living in remote communities where there is little or no access to health services (mainly the Northern Territory); and
- April 2010, to assist vulnerable people identified as continually unable to comply with requirements, and demonstrating behaviours consistent with a chronic mental health condition.

In December 2010, Centrelink implemented further flexible guidelines to assist people who are unlikely to provide written medical evidence because of a mental health or other serious condition, or because they live in a remote area and have limited access to medical services. These guidelines allow Job Capacity Assessors to verify details of a person's medical conditions without written medical evidence, based on documented conversations with the customer's treating doctor.

Local Connections to Work is a service delivery initiative in nine sites that supports the most disadvantaged customers to achieve increased social inclusion and economic participation. The main focus is vulnerable youth and extremely long term unemployed people. Barriers include but are not limited to homelessness, drug and alcohol dependency, psychiatric or mental illness and poor literacy and/or numeracy skills. Announced in the 2011/2012 Federal budget, an additional 15 Local Connections to Work sites will be implemented in 2012-13 to 2014-15, with a total of 24 Local Connections to Work sites by 2014-15.

The Health Professional Advisory Unit established in July 2010 and comprising Medical Practitioners and Registered Nurses, provides advice to:

- Job Capacity Assessors seeking clarification of medical evidence to inform Disability Support Pension (DSP) impairment ratings and work capacity recommendations;
- Centrelink staff seeking advice on DSP new claim and reviews, and complex non-DSP claims; and
- Centrelink Authorised Review Officers considering DSP medical appeals.

The Health Professional Advisory Unit is also able to contact customers' treating doctors for clarification or further detail on reports supplied by those doctors and can facilitate payment of fees for this advice. Due to the high demand for advice required about customers with mental health conditions; the Unit has recruited a Senior Clinical Psychologist.

From 5 July 2011, customers who were assessed as manifestly eligible for DSP under old guidelines will no longer be selected for a medical review. This change will benefit DSP customers with long term conditions – including mental illness – by ensuring they are not unnecessarily reviewed.

Centrelink and Medicare Australia have undertaken a joint project to allow medical practitioners to complete Medical Reports for Disability Support Pension customers online, using Medicare's Health Professional Online Services system. This will reduce the need to return paper copies of medical reports to Centrelink – for example, where a customer may otherwise need to make a return visit to their treating doctor to collect a completed Medical Report and then drop it back to Centrelink. It will reduce red tape and provide greater support for medical practitioners by allowing them to submit forms electronically directly to Centrelink. Medical practitioners will be able to submit report from 1 July 2011.

Recommendation 4

Centrelink and DEEWR should coordinate the updating of the Guide to Social Security Law to ensure that it appropriately supports the special procedure for assessing customers who are unwilling or unable to provide medical evidence.

Centrelink's progress

In July 2010, Centrelink worked with FaHCSIA to update the *Guide to Social Security Law 3.6.2.10 - Medical Evidence for DSP* outlining where eligibility for DSP can be assessed based on a Centrelink registered psychologist's diagnosis of a mental health condition.

In July 2011, FaHCSIA will make additional updates to the *Guide to Social Security Law 3.6.2.10 - Medical Evidence for DSP* to allow Job Capacity Assessors to verify details of a person's medical conditions without written medical evidence, based on documented conversations with the customer's treating doctor for vulnerable customers with suspected mental health conditions who are unable or unwilling to access medical evidence for DSP purposes.

Recommendation 5

Centrelink and DEEWR should amend the procedural instructions and policy guidance for assessing Participation Reports (PRs) to require staff to consider whether direct contact with a customer with mental illness is appropriate in the circumstances.

Centrelink's progress

Enhancements to compliance e-Reference files have been made to strengthen and clarify procedural guidelines regarding servicing and contact strategies for customers with mental illness. The intent of these updates is to support staff to consider flexible strategies such as engaging nominees or other suitable third parties where appropriate, according to the customer's needs and circumstances.

Centrelink has developed standardised 'pop up' text to be used when 'mental illness' is mentioned in e-Reference files. This 'pop up' text was published on 20 June 2011. The text will remind staff that when servicing customers with a mental illness, consideration should be given to the various impacts of the condition on the customer's ability to comply, including their capacity to attend appointments.

Recommendation 6

Centrelink should expand the current debt recovery procedures to require staff to consider any evidence of a customer's mental illness and associated communication or servicing arrangements before proceeding to negotiate repayment.

Centrelink's progress

Centrelink has established a Business Integrity Social Work service where vulnerable and at risk customers who are identified by debt recovery or fraud staff are referred to a Social Worker. There

are currently seven Social Workers working in the Business Integrity Social Work Team, and Business Integrity staff can also refer customers to Social Workers in the customer's local office.

The Business Integrity Social Work Service is also offering specific training to Business Integrity staff to create awareness of people at risk of suicide.

Recommendation 7

Centrelink and DEEWR should consider how to improve their information products and staff scripts to ensure customers are aware of the benefits of disclosing a mental illness, and feel comfortable doing so.

Centrelink's progress

A cross-portfolio stocktake of mental health training initiatives was undertaken in February 2011 with a view to developing a nationally consistent set of training packages available to support staff assisting customers presenting with a mental illness and better connect them with the appropriate services.

Centrelink has a number of training initiatives that may be enhanced to further assist and support people with mental illness. These programs include Positive Psychology, Building Resilience in the workplace, Mental Health First Aid and the Mental Health Series.

Centrelink currently has around 40 staff accredited to run Mental Health First Aid training, and in 2010, a total of 2,428 staff participated in Mental Health First Aid and Mental Health Awareness training.

As part of the Budget measure *Increased employment participation for people with mental illness* announced in the 2011/12 Federal Budget, DEEWR will be funding to develop training material which will build the capacity of employment service providers and Department of Human Services (including Centrelink) front line staff to identify and assist people with mental illness to gain employment. Staff will be provided with training and resources to increase their knowledge, skills and expertise in mental health awareness and effective employment strategies for the recruitment of job seeker with mental illness. Staff will also be trained in how to collaborate and build partnerships to better connect job seekers with appropriate mental health services. Appropriate communication strategies will be included as part of this training. A consultant will be engaged in 2011-12 with the training material finalised by 30 June 2012.

Centrelink is piloting communication methodologies for people with disabilities as part of the Better and Fairer Assessments Budget measure DSP Workforce Re-engagement Strategy (WRS). Face-to-face, phone, seminar and combined Seminar and Personal Contact methodologies will be tested over a three-year period. Centrelink has engaged a market research company to report on customers' experiences in the Strategy to date. The market research has been completed and the final report received on 14 April 2010. As a result of the report, Centrelink is currently updating DSP WRS seminar content and developed a new customer product - *DSP Checklist fridge magnet* which will be included in information packs for customers.

Centrelink's Technical Training Team has updated Technical Training Packages by strengthening messages regarding communication with customers with mental health issues.

Centrelink National Support Office, Social Work team conducted a survey of training needs of Centrelink Social Workers in September 2010 in relation to their understanding and experience in managing customers with mental health issues. As a result of survey findings, Centrelink contracted the NSW Institute of Psychiatry to deliver a two day Mental Health training course for 175 Social Workers nationally.

At the initial Working Party meeting, members made the following comments about customer's disclosure of mental health issues:

- *There should be recognition that assistance can be provided without the customer needing to disclose details of a mental health condition - disclosure should not be a pre-requisite for obtaining services or help.*

- *Some customers believe that disclosure to Centrelink can lead to disclosure across the board, e.g. other agencies, Health Insurance, employers, etc.*
- *Customer may feel that discrimination can occur once disclosure occurs.*
- *With the burden of disclosure comes the burden of proof (i.e. having to providing verification).*
- *Disclosure is about trust – trust takes time.*

Centrelink acknowledges that disclosure is important in some instances to enable Centrelink to confirm qualification for payments and programs. For example, part of the eligibility criteria for Disability Support Pension requires the person to have a diagnosed medical condition. To help address these concerns, Centrelink will further explore these issues at subsequent Working Party meetings.

Recommendation 8

Centrelink and DEEWR enhance the existing training and procedural instructions to provide greater guidance to staff about what is expected of them when they identify that a customer may have a mental illness. The procedural instructions should provide direct links to complementary procedures, such as referrals to social workers and Job Capacity Assessors (JCAs).

Centrelink's progress

Refer to progress against Recommendation 7 – This covers actions undertaken to update training products.

Refer to progress against Recommendation 1, 2, and 5 – These cover actions undertaken to update reference products.

Recommendation 9

Centrelink implement processes to collect information from customers who identify as having a disability (mental or physical) about the impact that disability has on their capacity to engage effectively with the social security system.

Centrelink's progress

From 4 July 2011, Centrelink will implement an IT change to prompt a manual intervention (e.g. phone contact) to occur before a customers' payment is automatically cancelled after failing to attending an Employment Services Assessment (ESAt). The change will identify customers with mental illness and other vulnerabilities and assist in re-connecting them to an ESAt appointment.

Centrelink will continue to reinforce the importance of utilising the 'Vulnerability Indicators' on the system, which include an indicator for psychological/psychiatric conditions.

From 13 June 2011, the new ESAt referral reason 'Exceptional Circumstances' may be used to refer customers who display erratic or psychotic behaviour and/or aggressive behaviour.

From 4 July 2011 the Centrelink system will be enhanced to ensure that where vulnerabilities are flagged by the Assessor in a JCA or ESAt report, the system will automate the coding of the vulnerability on the customer's Centrelink record.

In order to further progress this recommendation, Centrelink will consult with Working Party members.

Recommendation 10

Centrelink should consider implementing a standard process for recording any special needs or limitations associated with mental illness on a customer's electronic file, as well as any instructions/strategies for accommodating those needs.

It may be appropriate to consider adopting standard words for reflecting a customer's condition and needs in order to avoid the risk of causing offence to the customer in the event of an FOI application.

Centrelink's progress

This recommendation is complex and has privacy implications. Careful consideration of the use of any standard words to indicate a possible mental health condition would be needed in consultation with a range of stakeholders.

Centrelink will explore ways to address this recommendation through broader and more flexible communication strategies that would assist people with language/literacy difficulties, learning disabilities, acquired brain injury and other medical conditions in addition to those with mental illness.

In order to further progress this recommendation, Centrelink will consult with Working Party members.

Recommendation 11

Centrelink and DEEWR expand current training packages so that staff will communicate and better engage with customers with a mental illness

Centrelink's progress

Centrelink will continue to work with relevant policy departments to enhance information products, staff training material, e-Reference and Job Capacity Assessment Service Provider guidelines to improve Centrelink's service delivery to customers with a mental illness.

Refer to progress against Recommendation 7 – This covers actions undertaken to update training products.

Attachment A – Membership List

Organisation
Lifeline
Salvation Army
St Vincent De Paul
National Welfare Rights Network (NWRN)
National Ethnic Disability Alliance (NEDA).
National Disability Services
Mental Health Council of Australia (MHCA)
Mental Illness Fellowship of Australia
Carers Australia
Sane Australia
Women With Disabilities Australia
People with Disability Australia Incorporated
Consumer Rep
Carer Representative

Attachment B - Survey – Improving Service Delivery for People with Mental Illness

Thank you for taking the time to complete this voluntary survey.

The information you provide will inform Service Delivery engagement for people with mental illness. In particular we are interested in your views on:

- service delivery issues that people with mental illness experience while receiving assistance from Centrelink;
- emerging issues and trends in service delivery affecting people with mental illness;
- improving the delivery of services within the Human Services Portfolio for people with mental illness; and
- possible options to address the more complex recommendations outlined in the Ombudsman's Own Motion Investigation.

For your information, please refer to attached Report – Ombudsman's Own Motion Investigation - An Examination of the Interaction of People with Mental Illness with the Social Security System entitled '*Falling through the Cracks*' (released 22 September 2010).

http://www.ombudsman.gov.au/files/Falling-through-cracks_customers-with-mental-illness.pdf

The data collected will only be used for the purpose of this survey and no personal information will be shared.

Question	Explanatory notes	Question text	Response format
1 a		Are you a consumer or carer?	Yes / No (If 'YES' is answered, survey will go to Question 3 If 'NO' is answered, survey will go to Question 1b
1 b	Please answer this question if you represent an organisation or group.	What is the name of your organisation or group?	Free text
2	Please answer this question if you represent an organisation or group.	What is the main purpose of your organisation or group?	<ul style="list-style-type: none"> <input type="radio"/> Disability advocacy <input type="radio"/> Mental health advocacy <input type="radio"/> General health <input type="radio"/> Welfare rights <input type="radio"/> All of the above <input type="radio"/> Other – please specify (More than one may be selected)
3		Does your organisation/group have a particular geographic focus? (If you are a consumer or carer please indicate the location you live in e.g. remote/Rural or Urban/Metropolitan)	<ul style="list-style-type: none"> <input type="radio"/> National <input type="radio"/> Remote/Rural <input type="radio"/> Urban/Metropolitan <input type="radio"/> Local <input type="radio"/> All of the above <input type="radio"/> Other – please specify (More than one may be selected)
4		Do you (or your organisation/group) provide services directly to people with a mental illness?	<ul style="list-style-type: none"> <input type="radio"/> No <input type="radio"/> If yes, in less than 15 words, please describe the type of services provided
5		What sort of service delivery issues or barriers may be encountered by people with a mental illness seeking assistance from Centrelink? Please select up to five options to indicate the issues that are of most concern to you and your stakeholders.	<ol style="list-style-type: none"> 1. Customer has difficulty disclosing or discussing information about their) mental health condition or other personal circumstances 2. Restrictions on how customer contacts Centrelink or service providers 3. Failure to comply with participation requirements 4. Delay or failure in accessing the most appropriate income support payments 5. Delay or failure in accessing the most appropriate services (e.g. Disability Employment Services) 6. Unnecessary or repeated

Question	Explanatory notes	Question text	Response format
			contacts – e.g. need for multiple appointments to resolve issues 7. Difficulty in communication 8. Inability to gain evidence from specialists and/or Medical Practitioners in timeframes required 9. Inability to meet the cost of required medical evidence 10. Other comments (free text)
6	This information will help us to initiate and guide discussion in the working party forum, so you only need to provide a short dot point summary at this stage.	Please provide suggestions about how Centrelink and other agencies in the Human Services Portfolio could improve service delivery to people with a mental illness through better communication or information collection?	(No more than three dot points required)
7	This information will help us to initiate and guide discussion in the working party forum, so you only need to provide a short dot point summary at this stage.	Please provide comment on emerging issues and trends in service delivery affecting people with mental illness?	(No more than three dot points required)
8	This information will help us to initiate and guide discussion in the working party forum, so you only need to provide a short dot point summary at this stage.	Please identify three ways that Centrelink can improve the delivery of services for people with mental illness?	(No more than three dot points required)
<p>Ombudsman's recommendations</p> <p>Questions 9 – 13 relate to recommendations in the Ombudsman's Report. Your responses will help us to initiate and guide discussion in the working party forum, so you only need to provide a short dot point summary at this stage.</p> <p>The working party will provide an opportunity for you to discuss these issues in more detail.</p>			
9	<p>Recommendation 1 - <i>Centrelink and Employment Service Providers (ESPs) should expand their existing service delivery procedures to require staff to consider whether a customer's mental illness necessitates a particular outgoing communication strategy.</i></p>	What communication strategies could be used to help people with mental illness more easily engage Centrelink?	(No more than three dot points required)

Question	Explanatory notes	Question text	Response format
10	<p>Recommendation 7 - <i>Centrelink and the Department of Employment, Education and Workplace Relations(DEEWR) should consider how to improve their information products and staff scripts to ensure customers are aware of the benefits of disclosing a mental illness, and feel comfortable doing so.</i></p>	<p>How can Centrelink help customers feel more comfortable disclosing mental illness?</p>	<p>(No more than three dot points required)</p>
11	<p>Recommendation 9 - <i>Centrelink implement processes to collect information from customers who identify as having a disability (mental or physical) about the impact that disability has on their capacity to engage effectively with the social security system.</i></p>	<p>Should Centrelink collect information about a customer's specific needs in engaging with the social security system?</p>	<p>Yes / No Why? (No more than three dot points required)</p> <p>What sort of information should Centrelink collect about a customer's ability to engage with the social security system?</p> <p>(No more than three dot points required)</p>
12	<p>Recommendation 10 - <i>Centrelink should consider implementing a standard process for recording any special needs or limitations associated with mental illness on a customer's electronic file, as well as any instructions/strategies for accommodating those needs.</i> <i>(It may be appropriate to consider adopting standard words for reflecting a customer's condition and needs in order to avoid the risk of causing offence to the customer in the event of a Freedom of Information (FOI) application).</i></p>	<p>Do you see any <i>advantages</i> associated with Centrelink recording special needs and limitations due to the customer's mental health condition?</p> <p>Do you see any <i>disadvantages</i> associated with Centrelink recording special needs and limitations due to the customer's mental health condition?</p>	<p>Advantages (No more than three dot points required)</p> <p>Disadvantages (No more than three dot points required)</p>
13	<p>This information will help us to initiate and guide discussion in the working party forum, so you only need to provide a short dot point summary at this stage.</p>	<p>Would you like to provide any other comments about the recommendation from the Ombudsman's Own Motion Investigation?</p>	<p><input type="radio"/> Yes - Free text <input type="radio"/> No</p>

Response to Ombudsman - Action Items and Progress as at 21 October 2011

**Action Items from Meeting held with the Ombudsman's Office on 13 July 2011
Ombudsman's Report – Falling Through the Cracks**

Action Item	Progress	Status
<p>1 Provide any information that is available from your discussions with the Working Group, particularly in relation to the envisioned 'Communication Plan'.</p>	<p>Mental Health Service Delivery Working Party discussed the notion of a Communication Plan at the Working Party meeting conducted 22 July 2011. Working Party members were asked to source best and evolving practices which may be applied to the DHS environment. DHS Mental Health Team will also work with Case Coordination and other project teams to define and refine engagement strategies for vulnerable people. DHS has engaged in a wider communication strategy to increase the awareness of mental health issues and flexible servicing arrangements available to all customers. DHS has added mental health related information to the DHS website and as part of Mental Health Awareness Week (10 October – 18 October) undertook a number of promotional activities.</p>	<p>In Progress</p>
<p>2 Provide an update on the progress of the review of the Alternative Servicing Arrangements guidelines.</p>	<p>To assist in the preparation of the new Alternative Service Arrangements (ASA) guidelines, DHS is undertaking detailed quality assurance checks to identify issues to be addressed in the new guidelines. DHS is also undertaking a review of its shopfront operations with a focus on co-located sites to ensure that the new policy supports the delivery of its services to customers. This work on Alternative Servicing Arrangements (ASA) is expected to be completed by mid November 2011. ASA Business Owners will provide a progress report on updates to Alternative Servicing Arrangements (ASA) direct to the Ombudsman's Office via the Ombudsman Liaison team.</p>	<p>In progress</p>

Response to Ombudsman - Action Items and Progress as at 21 October 2011

Action Item	Progress	Status								
<p>3 Obtain copies of compliance e-References (or sections of these e-References) that have been updated to 'strengthen and clarify procedural guidelines regarding servicing and contact strategies for customers with mental illness.</p>	<table border="1"> <tr> <td data-bbox="1252 784 1276 996">File</td> <td data-bbox="1252 996 1276 1848">Content included in Updates</td> </tr> <tr> <td data-bbox="877 784 1252 996">001.41110 - Establishing contact to discuss non-compliance or potential barriers to compliance</td> <td data-bbox="877 996 1252 1848"> <p>New details created in the "Extra" tab outlining processes for Participation Solutions Team (PST) around contact with correspondence nominee or authorised third party for a customer who has a mental illness.</p> <p>Links have been added to e-Reference files related to:</p> <ul style="list-style-type: none"> disclosing information to / accepting information from nominees or third parties; servicing customers with a mental illness and behaviours which may indicate that a customer has a mental illness </td> </tr> <tr> <td data-bbox="550 784 877 996">001.70160 - Assessing reasonable excuse for non-compliance with a participation requirement</td> <td data-bbox="550 996 877 1848"> <p>Use of Assessment Referral Reason 'Participation Failure Pending' in circumstances where:</p> <ul style="list-style-type: none"> a Participation Solutions Team (PST) CSA requires an assessment (e.g. of a suspected mental health condition, and insufficient information has been disclosed via the Job Seeker Classification Instrument (JSCI) to trigger an Employment Services Assessment (ESAT) referral. </td> </tr> <tr> <td data-bbox="290 784 550 996">001.41920 - Reconnecting job seekers during participation compliance investigations</td> <td data-bbox="290 996 550 1848"> <p>Changes made as a result of the implementation of the <i>Tougher Rules for Job Seekers</i> model whereby 'reconnection' occurs up front in an investigation.</p> </td> </tr> </table>	File	Content included in Updates	001.41110 - Establishing contact to discuss non-compliance or potential barriers to compliance	<p>New details created in the "Extra" tab outlining processes for Participation Solutions Team (PST) around contact with correspondence nominee or authorised third party for a customer who has a mental illness.</p> <p>Links have been added to e-Reference files related to:</p> <ul style="list-style-type: none"> disclosing information to / accepting information from nominees or third parties; servicing customers with a mental illness and behaviours which may indicate that a customer has a mental illness 	001.70160 - Assessing reasonable excuse for non-compliance with a participation requirement	<p>Use of Assessment Referral Reason 'Participation Failure Pending' in circumstances where:</p> <ul style="list-style-type: none"> a Participation Solutions Team (PST) CSA requires an assessment (e.g. of a suspected mental health condition, and insufficient information has been disclosed via the Job Seeker Classification Instrument (JSCI) to trigger an Employment Services Assessment (ESAT) referral. 	001.41920 - Reconnecting job seekers during participation compliance investigations	<p>Changes made as a result of the implementation of the <i>Tougher Rules for Job Seekers</i> model whereby 'reconnection' occurs up front in an investigation.</p>	Completed
File	Content included in Updates									
001.41110 - Establishing contact to discuss non-compliance or potential barriers to compliance	<p>New details created in the "Extra" tab outlining processes for Participation Solutions Team (PST) around contact with correspondence nominee or authorised third party for a customer who has a mental illness.</p> <p>Links have been added to e-Reference files related to:</p> <ul style="list-style-type: none"> disclosing information to / accepting information from nominees or third parties; servicing customers with a mental illness and behaviours which may indicate that a customer has a mental illness 									
001.70160 - Assessing reasonable excuse for non-compliance with a participation requirement	<p>Use of Assessment Referral Reason 'Participation Failure Pending' in circumstances where:</p> <ul style="list-style-type: none"> a Participation Solutions Team (PST) CSA requires an assessment (e.g. of a suspected mental health condition, and insufficient information has been disclosed via the Job Seeker Classification Instrument (JSCI) to trigger an Employment Services Assessment (ESAT) referral. 									
001.41920 - Reconnecting job seekers during participation compliance investigations	<p>Changes made as a result of the implementation of the <i>Tougher Rules for Job Seekers</i> model whereby 'reconnection' occurs up front in an investigation.</p>									

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Action Item	Progress	Status
<p>4 Obtain a copy of the 'standardised "pop up" text to be used when "mental health related terms" are mentioned in e-Reference files, e.g. mental illness.</p>	<p>mental health pop up text <i>When servicing customers with a mental illness, please consider the various impacts of the condition on their ability to comply, including their capacity to attend appointments. Customers may attend appointments with a support person of their choice. For example, a customer may invite a relative, friend or an advocate from a disability, mental health or community organisation to an appointment if they feel comfortable doing so.</i></p>	<p>Completed</p>
<p>5 Advise whether Centrelink is working toward using Vulnerability Indicators in a more general sense (that is, outside the compliance areas where they are currently used)</p>	<p>Vulnerability Indicators are used for customers with participation and activity test requirements. Some DSP customers who were previously job seekers will have Vulnerability Indicators coded on their record. DHS staff can view this information at anytime to assist them better understand customer circumstances. DHS will investigate using the Vulnerability Indicator for DSP customers as part of the new Budget measure <i>Participation requirements for DSP recipients under 35 years of age</i>. DHS have initiated discussions with DEEWR regarding expanding the use of Vulnerability Indicators with DSP customers.</p>	<p>In Progress</p>
<p>6 Advise whether Centrelink refers debts owing by people with a mental illness to mercantile agents</p>	<p>Referral to Collection (Mercantile) agents only occurs where a customer has a debt and is no longer in receipt of a Centrelink payment. Debt Recovery officers consider all issues including mental health and vulnerability before a manual referral to a Collection (mercantile) agent is decided. All Collection (mercantile) agents have training in negotiation with customers which includes dealing with customers with mental health and vulnerability issues.</p>	<p>Completed</p>

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Action Item	Progress	Status
<p>7</p> <p>DHS to ensure Business Integrity (BI) Customer Service Advisors (CSAs) have clear procedural guidelines regarding how to identify a vulnerable customer.</p>	<p>The text below (highlighted in blue) will be added to the following files at the next available release (possibly 17 October 2011).</p> <ul style="list-style-type: none"> • 107.12400 - Non-recovery - waiving debts • 107.12420 - Small debt waivers • 107.12440 - Reversal of waivers • 107.12430 - Special and unusual circumstances waivers. This procedure will be updated in Detail Step 3 to add a Question - <i>Has the customer indicated they have special circumstances that requires Social Worker involvement?</i> If yes, contact the BI Social Work team. If no, go to Step 4. <p>Social workers role in Business Integrity</p> <p><i>Referral to Centrelink Social workers within Business Integrity who support vulnerable 'at risk' customers facing complex needs and barriers to economic and social participation may be appropriate. The additional problem of managing multiple debts from Centrelink and other institutions can be overwhelming for our most 'at risk and vulnerable' customers with a greater risk of non-compliance, for more information see Social workers role in Business Integrity (link).</i></p> <p>NOTE – 'Detail' tab in the linked page "Social workers role in Business Integrity" will include new information to help CSAs identify customers who may require referral to a BI social worker.</p>	<p>Completed</p>
<p>8</p> <p>DHS to check with Social Work Branch regarding the extent of flexibility possible when developing customer recovery plans.</p>	<p>Staff need to consider e-Reference file 107.12000 - <i>Special or unusual circumstances</i> when developing a customer recovery plan. Staff can refer to social work services if additional information or support is required.</p>	<p>Completed</p>
<p>9</p> <p>DHS will ask Mental Health Service Delivery Working Party members if Ombudsman's Office representation is welcome.</p>	<p>The Ombudsman's Office is now a member of the Working Party and attended a meeting on 23 September 2011.</p>	<p>Completed</p>

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	Action Item	Progress	Status
10	DHS will send Case Co-ordination and Co design power point presentations to representatives of the Ombudsman's Office.	Presentations have been forwarded to the Ombudsman's Office.	Completed