



CAMPBELL PAGE SUBMISSION

Executive Summary

As a national employment services provider, Campbell Page provided comprehensive feedback to the Independent Review of the Job Seeker Compliance Framework, July 2010. It is pleasing that a number of points identified are evidenced in the proposed amendments to Social Security Legislation.

Campbell Page continues to support continuous improvement of the job seeker compliance regime in order to achieve a highly inclusive service. We believe that implementation of this would see the intended increased attendance of job seekers result and benefits manifest against the points from our previous submission. In particular:

Effectiveness of the compliance regime for long term unemployed

Behavioural changes amongst the cohort of long term unemployed; especially those who have not seen evidence of the compliance regime being upheld. The immediacy of the payment suspension presents a compelling reason to engage with your provider, and helps reinforce the intention of the no show- no pay rule. The need for multiple participation reports to be lodged to drive attendance will be reduced, as will the need for Comprehensive Compliance Assessments. Key to the implementation of the amendments will be the method of notifying Centrelink of non-attendance and response times to these notifications. Training and consistency were identified as opportunities in the Job Seeker Compliance Framework review also.

Vulnerable job seekers

Campbell Page recognises that payment suspension may present financial hardship to those who are most vulnerable, whether formally identified as such or otherwise. The issues presented in last year's submission remain; compliance needs to be promoted to this group of job seekers. Its enforcement will present the opportunities for providers to engage with job seekers and address barriers. Providers will benefit from uniform identification and application of the vulnerability determinates to be used by Centrelink, should the amendments be implemented.

Job seeker awareness of changes

The adequacy of information and education was identified in the previous submission as critical and remains so, for these amendments to be successful. The Employment Pathway Plan (EPP) is fundamental to mapping and agreeing activities and appointments. To manage the transition from the current compliance requirements to the proposed, and appear in a job seeker's EPP, a communication strategy outlining the changes and consequences will prepare the provider and job seeker community.

Consequences of not attending scheduled appointments, including reconnection appointments.

Impact to participants

The proposed changes to the Social Security Legislation should be effective in the long term in driving behavioural changes, as the impetus is now with the job seeker to notify their provider **before** the appointment of their non-attendance. This increases the job seeker's responsibility and accountability.

It provides a direct deterrent for job seekers who do not see their responsibilities as important. Coupled with the immediacy of the impact to participants this approach should meet the intentions of the amendments to the Bill; an increase in attendance rates.

As with all changes, in the early stages there may be some negative reactions amongst job seekers, and perhaps an increase in complaints. There will be circumstances, under this change, where there will be social implications as the result of suspended payments to job seekers. When suspension occurs quickly, this may result in job seekers not being able to arrange other financial assistance at short notice. Issues may manifest; an inability to meet living expenses, further strain on community services and an increase in anti-social behaviour.

For those job seekers whose history of non-attendance can be attributed to unidentified mental health issues, this may not result in an increase in attendance. Suspension of benefits may result in an exacerbation of the condition that inhibits attendance.

In relation to rescheduled appointments, any suspension of payments has the potential to expose job seekers to financial difficulties. The application of a suspension, and loss of payment for each day from the second missed appointment until the job seeker does attend should see an increase in participation.

Impact to Providers

This change will help improve attendance and ensure providers have the opportunities to continue engaging with their job seekers. Providers can not adequately assess the administrative impact until the mechanism to notify Centrelink of non attendance is confirmed.

The immediate impacts to providers may be an increase in complaints from job seekers and an initial spike in administrative effort involved with communicating non-attendance to Centrelink, and subsequent re-engagement activities driven by the suspension. As the job seeker community becomes aware of the changes and the likelihood of their benefits being suspended, this may decrease over time as behaviour changes

Under the current compliance regime, providers find that many compliance reports are not upheld. If participation failure reports are not upheld, and therefore no consequences to the job seeker, then job seekers will not see any imperative to change behaviour.

Activity Attendance & Compliance

Impact to participants

There is a contingent of job seekers who are difficult to engage and whose attendance is poor. The existing compliance regime has not changed these patterns of behaviour, so for these proposed changes to be more effective in driving attendance, the consequences must be clear. This particularly applies to vulnerable job seekers, including those with health or mental health issues, where the rate of upheld participation failures is lower. For other job seekers though, immediate suspension of payment for failure to participate in activities may be the incentive required.

Where a job seeker has failed to attend an activity, a consideration should be given to allowing providers to invoke the suspension period through the Employment Services System.

Impact to Providers

There are advantages to making the rules that drive attendance at activities more robust. Activities often involve community partners or local enterprises. Local initiatives and partnerships which have been established as the result of stakeholder engagement by JSA Providers is central to the success of Employment Service Deed (ESD4 2009-2012). Relationships can be negatively impacted if job seekers continually avoid attendance. With prior notification, this allows contingencies to be put in place. It also acts as a way to promote responsibility and accountability to others.

EPPs

Impact to participants

The role of the Employment Pathway Plan (EPP) is critical to the successful implementation of the proposed changes. This tool documents the agreement between the job seeker and their provider and stipulates what is a mandatory appointment or activity in a clear and specific way. There is an opportunity to make the EPP more relevant and meaningful to the participant given the new suspension possibilities.

Impact to providers

Providers will need to continue to be conscientious in ensuring EPPs are accurate and robust enough to make both appointments and activities very clear, and including the ramifications of the requirements not being met.

Vulnerable job seekers.

Impact to participants

As noted in other sections of this response, the compliance regime has not been uniformly applied to those job seekers deemed as vulnerable. Implementation of the proposed changes may result in a change in perception by this group of job seekers; if payments are suspended in the first instance, this will drive re-engagement.

Any suspension of payment presents the risk of exposing job seekers to a greater risk of exclusion, disengagement and increased vulnerability. To some job seekers who have major non-vocational barriers, this will not have the desired effect of increased participation.

Impact to providers

Providers will need greater clarity as to the criteria that determine vulnerability, ie if the system (ESS) held vulnerability indicators alone will be used or if Centrelink will assess on a case by case basis.

Reasonable Excuse

Impact to participants

The ability to seek a reasonable excuse will depend on the job seeker's ability to contact their provider, and conversely, the provider's ability to contact the job seeker. This may not always be possible for those who have accommodation issues or limited access to phones or the internet.

Impact to providers

The proposed change is very close to the original wording in the Bill and has been dependant on the interpretation of Centrelink staff for its application. The provision of definitions around reasonable excuse will help providers ensure only those excuses which do not fit within this parameter are referred to Centrelink for participation failures. By understanding this definition of reasonable will mean administrative effort is spent only on those cases where it applies.

Suspension effective in current fortnight

Impact to participants

This increases the scope for personal hardship for job seekers, though offers sufficient incentive for job seekers to engage with their provider.

Impact to providers

The effectiveness of this change will depend on the application of suspensions by Centrelink. There is also the potential for more administration costs as a result of efforts to establish if non-attendance was with a reasonable excuse. Providers may also see increased use of Employment Pathway Funds to assist job seekers who have not received their benefit and need assistance.