

28 August 2024

DSS – DES reform

DESConsultations@dss.gov.au.

The New Specialist Disability Employment Program

About Economic Justice Australia

Economic Justice Australia (EJA) is the peak organisation for community legal centres providing specialist advice to people on their social security issues and rights. Our members across Australia have provided people with free and independent information, advice, education and representation in the area of social security for over 30 years.

EJA provides expert advice to government on social security reform to make it more effective and accessible. Our law and policy reform work:

- Strengthens the effectiveness and integrity of our social security system;
- Educates the community; and
- Improves people’s lives by reducing poverty and inequality.

EJA member community legal centres regularly provide advice to social security recipients subject to mutual obligation requirements as administered by privatised employment services.

Introduction

Employment services make decisions within the ambit of social security law by acting as delegates of the Secretary and interpreting policy and guidelines. Therefore, the way that mutual obligation policy is designed, expressed in guidelines and incentivised in contract terms, directly affects the integrity of social security law administration by privatised employment services.

The submission is informed by a general principle, that all participation requirements should have a clear legislative base that provides participants with clear avenue for appeal of decisions that affect the nature of requirements and potentially limit payments. It is also informed by a human rights lens, through which the right of people with disability to work should not be enforced in such a way that it limits the right to social security and choice.

Accordingly, our response to this Exposure Draft (ED) focuses primarily on rights enabling provisions in the language of the ED, the qualifications of staff, the concept of meaningful engagement and contact/appointment frequency, and the split between Intensive and Flexible services.

EJA welcomes the evolution of the New Specialist DES (DES) program, particularly the:

- Increased focus on a professionalised workforce
- More flexibility in job plan requirements
- Possible changes to Program of Support requirements

However, our overall view is that the new DES model has fallen into the trap of repeated DES reforms in which the contract imposes requirements on providers to enforce an inflexible activation model, rather than enabling them to innovate and personalise services. This 'path dependency' has been identified in the academic literature as a significant reason why changes to contract terms have not facilitated improvements to employment services¹. This 'path dependency' is reflected in the language of the ED, which does not realise participant empowerment, human or social security rights, choice or control.

Instead, it uses language that assigns providers with the responsibility for delivering contract requirements according to a formula that remains rigid. While this approach to specifying contract requirements remains in place it is unlikely that the desired cultural reforms will be realised.

Indeed, given the ambition and breadth of the recent Workforce Australia inquiry recommendations, the new DES model is disappointing, and will lock participants and providers into a sub-optimal contract for at least three years. The proposed changes to the performance framework will not result in an improved experience for people with disability subject to provider behaviour that is incentivised to impose strict requirements to get people with a disability into jobs quickly². Furthermore, overregulation of provider inputs is likely to further constrain innovation and better outcomes for people with disability.³

Ultimately there is need to shift to a form of relational commissioning, and relational service delivery that these reforms fail to deliver.

Fortunately, there remains time to incorporate some changes that would better realise the rights of people with disability within the broad design of the model as described in the ED. Please find below our responses to the relevant questions in the Companion Guide.⁴ Our responses suggest improvements to language, definitions and the use of social security law to support a higher quality of service.

Language

Q. What is the preferred descriptor for a person being assisted through the new program – is it participant, client or another descriptor? Please provide reasons for your suggestion.

A. The obligation of providers to provide quality services and to treat DES participants with respect should be foregrounded in the contracting arrangements. However, it is unlikely to

¹ E.g. Davidson, P. (2022). Is this the end of the Job Network model? The evolution and future of performance-based contracting of employment services in Australia. *Australian Journal of Social Issues*, 57(3), 476-496.

² It is worth revisiting Considine et al submission to Workforce Australia on the causes of suboptimal contracting: Considine, M., Lewis, J.M., O'Sullivan, S., Nguyen, P., McGann, M., and Ball, S. (2023) *Submission to Select Committee on Workforce Australia Employment Services*. Melbourne: University of Melbourne. Available at <https://www.aph.gov.au/DocumentStore.ashx?id=a7d90e46-1e76-4284-858f-94033473b562&subId=735067>.

³ Considine, M., McGann, M., O'Sullivan, S., Nguyen, P., & Lewis, J. (2018). Improving outcomes for disadvantaged jobseekers: the next generation of employment services: response to discussion paper. *Melbourne: The Policy Lab, The University of Melbourne*.

⁴ <https://engage.dss.gov.au/wp-content/uploads/2024/08/New-Specialist-Disability-Employment-Program-RFT-EXPOSURE-DRAFT-COMPANION-GUIDE.pdf>

make any difference whether the person who is using a DES is called a participant or client because the language of the ED reinforces the power imbalance between people with disability and employment services. This criticism is not a matter of semantics because the language that is used throughout the ED and its prescription of provider requirements does not foreground the rights and needs of participants.

For example, Figure 1 shows how the language of the ED imposes requirements on providers, that do not emphasise the role of the participant in shaping the employment plan. The highlighted text is typical of the language throughout the ED that reinforces the power imbalance between participants and providers. At no time does ED specify the provider's responsibility to genuinely listen to, negotiate and enable the participant to lead the development of the job plan.

Figure 1 – extract from ED - language that disempowers participants

The provider will ascertain a participant's skills, strengths and aspirations, plus any barriers or issues that may impact on a Participant's ability to effectively transition to sustainable Employment and develop a Job Plan based on the Provider's initial assessment of the Participant's skills, strengths and circumstances. This allows the Provider to deliver tailored, person-centred case management to each Participant – as identified by a Participant's phase and service offer, and the contents of their Job Plan.

EJA comment: *There is no mention of this being a process undertaken in partnership with a participant, or because there has been an agreement that the chosen activities are useful. The term 'person-centred case management' is misused because it is dictated by the terms that follow, e.g. a Participant's phase and service offer, and the contents of their Job Plan.*

Another section says -

The Provider may assess the needs of a Participant using assessments such as:

- the Job Seeker Assessment Framework (including the Job Seeker Snapshot)
- functional capacity evaluation, physical assessment, or other assessments to determine the Participant's abilities or limits
- a Skills Assessment
- ESAt / JCA barriers to employment and recommended interventions from the ESAt / JCA, and/or its own resources.

EJA comment: *There is no mention of this being at the request of a participant, or because there has been an agreement that this is useful.*

The Provider may need to conduct a Job Seeker Snapshot for a Participant during this period if it has not already been completed by Services Australia or the Participant as part of the Income Support Payment claim process. The Provider may also need to update the Job Seeker Snapshot to include new information disclosed during this period or at any subsequent time.

EJA comment: *There is no mention of this being at the request of a participant, or because there has been an agreement that this is useful.*

The kind of partnership approach to negotiating job plan requirements that is preferable is called co-production, a model that has been beneficial in Denmark⁵. The co-production approach is based on a capability model which focuses on investment in a person's abilities rather than on overcoming deficits, or barriers.

Recommendation 1: Review specification of provider contract requirements so that the rights of people with disability to exercise choice and control, and to be treated with dignity and respect are foregrounded in the contract.

Qualifications of staff

Q. What minimum qualifications are essential for Provider staff who are engaging with Participants and Employers?

Q. The Exposure Draft encourages a move toward minimum qualifications for front-line staff: should this be mandatory for the new program? If so, what do you see as the opportunities and risks associated with this proposal? What would be a reasonable period to implement these requirements?

A. The ability of employment services to build the trust-based relationships needed for co-production depends on workers having the right skills and experience to engage well with people with disability as well as an understanding of structural barriers that impede a person's access to employment.

EJA supports a workforce transition towards professional accreditation accompanied by support from the Jobs and Skills Council relevant to this field. Unfortunately, the scope of the Human Ability Jobs and Skills Council⁶ does not refer to employment services, and there is no other Jobs and Skills Council that is relevant. This suggests the need for the identification of a Jobs and Skills Council to oversee the development of the employment services workforce.

Job plan requirements

The Government's Jobs and Skills White Paper⁷ set out a vision for more inclusive employment policy based on capability investment. Box 1 shows select principles for reform of DES outlined in the White Paper⁸. We have reproduced this box to emphasise the aspirations of the White Paper to inform our analysis of the proposed changes to participant requirements and compliance.

Box 1 – White Paper Box R.4 on disability employment services

- 2 a) the system builds human capital and ensures job placements are appropriate
- 3 Services protect the dignity and respect rights of individuals.
 - a) services help individuals meet their employment and personal development goals
- 4 Services provide a pathway towards decent jobs that provide the flexibility and security that individuals need.

⁵ We recommend - LARSEN F, CASWELL D. Co-Creation in an era of Welfare Conditionality – Lessons from Denmark. *Journal of Social Policy*. 2022;51(1):58-76. doi:10.1017/S0047279420000665

⁶ <https://humanability.com.au/>

⁷ <https://treasury.gov.au/employment-whitepaper/final-report>

⁸ <https://treasury.gov.au/employment-whitepaper/final-report>

Overall, we assess the new DES model as activation, rather than investment, heavy. This is because the frequency of appointments is high, participation is mandatory, and compliance is monitored and managed through the Targeted Compliance Framework (TCF). The ED foregrounds the ways in which providers are expected to manage participants, rather than how to treat them with respect and to tailor services according to choices they make.

In contrast, capability development requires significant investment in training and the soft skills that are needed for the workforce of today. It also focuses on employer incentives and measures to enable people with disability to meet the cost of disability in relation to employment) and to support people in the workplace.

An activation heavy model is especially inappropriate for people with disability or who have been unemployed long term or for people aged who are mature aged. These cohorts have been increasing and now constitutes almost 50 per cent of the DES caseload. An activation heavy model will not help these people gain employment.

Recommendation 2: Remove mandatory activation elements, such as prescriptive appointments/contacts, and ensure that all job plan requirements are determined in partnership with participants.

A limitation of the proposed DES model is that it does not reflect the aspirations of the Workforce Australia inquiry, and is rather, stuck in a compliance-oriented activation-based model of employment services. The Workforce Australia inquiry proposed significant changes to the way that job plans are formulated so that participant needs are at the forefront as shown in Box 2.

Box 2 Workforce Australia inquiry: Recommendation 40 - Job Plans (employment pathway plans)

11.53 The Committee recommends that the Australian Government design and implement a new policy framework to give effect to the legislative requirement for an Employment Pathway Plan, which should include the following key elements:

- An acknowledgement of the requirement to show commitment and engage meaningfully with the employment services system and a broad explanation of the genuinely mutual obligations which apply. This includes the preparation of a Participation and Jobs Plan within a default timeline and that a payment is provisional until the plan is approved.
- A new Participation and Jobs Plan is developed: by the participant— online if in hybrid services; with Employment Services Australia if being case managed there; or with a contracted partner Job Coach provider if referred for outsourced case management. This would be a goal-based plan which should include, at a minimum:
 - an overview of the participant’s aspirations, needs, and circumstances;
 - the support the provider will deliver to help the jobseeker address their needs and achieve their aspirations;
 - activities in which the participant commits to engage, including how these will contribute to building capacity and moving toward employment;
 - timeframes for completing expected activities; and

- agreed requirements for regular appointments (the timeframe for which may vary depending on individual circumstances).
- The Participation and Jobs Plan is a result of genuine negotiation between jobseeker and provider.
- The Participation and Jobs Plan is regularly reviewed and updated to ensure that it aligns with the current needs and circumstances of the jobseeker.

In contrast, the ED outlines the provider role as below (Box 3) and does not mention any of the changes recommended by the Workforce Australia inquiry.

Box 3 – Exposure draft requirements for job plans

Providers will...explain the purpose and contents of a Job Plan, and prepare or update a Job Plan with the Participant [for Participants (Mutual Obligation), explain their rights and obligations under the Social Security Law, including: how they can meet their Mutual Obligation Requirements, and what meaningful engagement means; the consequences of not meeting their Mutual Obligation Requirements, and the Targeted Compliance Framework.

EJA supports an approach to developing job plans which realises the reciprocal obligations of providers to provide services to support people with disability when they are looking for paid work. Most importantly the job plan must set out a pathway that has been genuinely negotiated and focused on building the capability of participants in such a way that empowers them with choice and confidence.

Recommendation 3: Replace mutual obligations with reciprocity-based practice – like ‘The Deal’ used in BSL’s practice with young people – which makes clear what each party will commit to doing to achieve the participant’s goals.⁹

Recommendation 4: Review Social Security Law so that requirements for people with disability on job seeker payment are consistent with human rights principles.

Recommendation 5: Bring forward the Workforce Australia inquiry recommendation 40 in relation to Tailored job plans.

Recommendation 6: Bring forward the Workforce Australia inquiry recommendation 62 regarding the development of a shared accountability framework.

Q. What are some of the ways a Participant could demonstrate ‘Meaningful Engagement’, and how should that be monitored and recorded?

A. The ED introduces a concept for the mutual obligation framework called meaningful engagement. The introduction of this concept is a welcome shift towards a more flexible approach to requirements in the job plan. However, the aspiration for meaningful engagement does not reflect the intention of the White Paper because it does not reflect a model of capability development involving a genuinely negotiated job plan. It also falls short of the aspirations of the Workforce Australia inquiry as set out in Recommendation 40 and reproduced Box 2.

⁹ Recommendation from BSL’s submission to the Workforce Australia inquiry:
<https://library.bsl.org.au/showitem.php?handle=1/13320>

The concept of meaningful engagement lacks a definition and is likely to be misused either through subjective interpretation, and/or because it does not have substance in social security law that would provide protection from misuse or misinterpretation. Without a concrete definition of meaningful engagement there will be conflict between the views of participants and providers on what constitutes meaningful engagement, and what would count as meaningful for one person, may not be regarded as such for another. A person may consider an activity meaningful relative to their health and capacity to search for a job, while their provider may not agree to it, or it may not be outlined in guidelines.

For example, a person with an episodic disability subject to requirements in the Intensive stream, may find participation in a social activity such as a meal club, a beneficial activity during a period of convalescence. Participation in such an activity can be a stepping stone on a rehabilitation pathway or may be useful for confidence building.

It is not likely that one set of examples or conditions would be sufficient to encompass the breadth of activities that are meaningful for the preferences of individual, so the wording of the concept of meaningful engagement must be carefully considered. The definition of meaningful engagement should be informed by a capabilities approach, recognising the forms of social participation that are beneficial such as volunteering, clubs and groups.

Therefore, there is a need to provide a definition that encompasses activities or behaviours of meaningful engagement with examples, to ensure that there is consistent and fair implementation of the intent of the policy. This definition should be in guidelines and the Social Security Guide and contain phrases that have a clear and simple meaning in English.

Recommendation 7: The development of this definition should be subject to further consultation to ensure that it is implemented in such a way that empowers participants to have flexibility in the way that mutual obligation requirements are met.

Recommendation 8: Develop a process through which a person can easily access review when there is conflict over the way that meaningful engagement is interpreted in their job plan.

Q. Should a Participant with a Job Plan that includes detailed requirements be able to return to a Job Plan with the meaningful engagement requirement, and if so, under what conditions?

A. Reverting to a more prescriptive job plan when a participant has been judged as not meaningfully engaging is likely to be regarded as a punitive step that would affect trust in the relationship between the DES provider and the participant. There is no evidence that a more prescriptive and punitive set of mutual obligation requirements is likely to help a person with a disability into an ongoing job and it is an ethically unsound practice¹⁰.

The proposed variations to job plans also stretches the purpose of the clauses in the Admin Act beyond their intent and confuses the relationship between the provisions of the sections of the Acts relating to job plan administration and compliance.

Section 40V of the Administration Act contains the provisions that allow for a job plan to be varied. Importantly, when varying the job plan, it must consider the matters mentioned in paragraphs 40D(5)(a), (b), (c) and (d), which are essentially the requirements that should be

¹⁰ Casey, S. (2024). Beyond job-search theory: A value pluralist approach to conditionality in Australian employment services. *Australian Journal of Social Issues*.

considered when generating the initial job plan. There are explicit preclusions for job plans in 40K(2) and the associated Determination¹¹.

The Act does not specify the reasons why a plan should or could be varied for failing to meet the requirements, and hence does not provide powers to vary the job plan based on failure to meet a job plan requirement such as meaningful engagement.

Even if a legislative loophole is identified to allow variation of job plans for compliance, we do not support shifting participants from less prescriptive to more prescriptive job plans, and therefore do not support the reversal of the process. All job plans should be genuinely negotiated and set out a person's goals and the steps that will help them realise those goals. This was an important finding of the Workforce Australia inquiry and the reasoning behind Recommendation 40 as reproduced in Box 2.

Effective employment services would support participants by providing them with job search skills that are appropriate for the sector of the labour market they want or are likely to enter. Employment services should not enforce a minimum number of job searches. Instead, the employment consultant should have the relevant skills to assess the quality of these skills, and help the participant produce higher quality applications, or use other methods such as networking, social participation and volunteering where possible.

A better model to follow would be to ensure that definitions are legislated and that non-compliance with requirements is dealt with under the compliance model. However, the compliance model as it currently stands is too punitive and needs to be reformed. It is not proportionate under Australia's obligations under UN Convention on the Rights of People with Disabilities and International Covenant on Economic, Social and Cultural Rights (ICESCR).

Our analysis of the DES outcome data for the FY 2023-2024 indicates that at best, DES plays a role in getting 10 percent of participants into jobs that last 52 weeks. Although the government aspires to improve outcomes from DES, this is not offset by the psychological distress caused by the enforcement of compliance.

For example, the TCF data for January 2024 for DESⁱ shows that suspensions affect 20 per cent of the 129,000 participants with mutual obligations, while threat of suspension through the 2-day resolution period affects a total of 27 per cent of participants. Fifty per cent of these suspensions are for provider appointments, and the other 50 per cent are automated suspensions when the participant has not reported the required number of job searches.

The human rights of people with disability are affected by the use of payment suspensions and payment penalties. As with the ParentsNext program, there are no circumstances in which it is a proportionate measure to deny a person with disability the right to social security. The engagement of this right is not offset by the right to work and a decent standard of living that employment services should facilitate.

If a DES participant is not engaging, this may point to issues with either the quality of the services being provided or the appropriateness of the job plan. Disengagement from services should be treated as failure of the service to provide beneficial services.

¹¹ Streamlining Instrument - <https://www.legislation.gov.au/F2022L00561/asmade/text>

DES should be designed so that they generate intrinsic motivation. If services are valued and genuinely reflect a person's goals and aspirations, relative to the opportunities available in the labour market, they are more likely to be successful.

The use of compliance to enforce mutual obligation requirements, however they are constructed, seems disproportionate to the distress participants experience when they are exposed to threats to their income support payments. The approach to mutual obligation in DES requires radical changes so that the current system involving high levels of threat to financial security is discontinued.

Recommendation 9: Use special classes instruments to exempt people with disability from the Targeted Compliance Framework.

Recommendation 10: Develop an alternative to the Targeted Compliance Framework for extreme cases of non-compliance.

Recommendations 11: Implement the Workforce Australia inquiry Recommendations 57 and 62, bringing forward reforms to the jobseeker compliance system in consultation with people directly affected, peak bodies and experts, to develop a better model.

Recommendation 12: Locate responsibility for jobseeker compliance administration with public servants who are trained in administrative law.

Recommendation 13: Use payment suspensions only as a last resort, when all other forms of engagement have been exhausted.

Recommendation 14: Ensure the compliance framework and participation requirements are legislatively based under social security law and provide clear avenues for appeal.

Recommendation 15: Shift away from punitive measures and develop a system based on incentives rather than punishment.

Q. How else can the department be assured that participants are engaging meaningfully?

A. The ED Companion Guide ask what kind of reporting might be required to demonstrate meaningful engagement. All engagement should be monitored by developing a trust-based relationship with an employment consultant who has the relevant skills to understand and empathise with participants. There should not be a need for a person to provide evidence (e.g. uploading documentation) to prove they have been attempting to improve their employability or apply for jobs. A trust-based relationship with a worker should engender transparency and positive communication that would be damaged by onerous reporting requirements.

Recommendation 16: Ensure job search related activities are discussed during monthly appointments, not via an online or points-based reporting process.

Q. What should count as a contact for the purposes of the Intensive and Flexible Service offers?

A. EJA does not support a distinction between intensive and flexible streams, because ideally all services should be flexible, and individualised to support the participant. EJA understands the government's reluctance to fund flexible services at the same level as intensive services but sees this as a problem of path dependency in which there is a lack of trust that providers will behave appropriately. This lack of trust has led, throughout the history of employment

services, to a hyper-specification of service model requirements such as frequency of appointments, minimum job search or activity requirements and so on, referred to earlier in this submission. It is also apparent in the ED's emphasis on questions relating to evidence the Department may need or request relating to service provision.

If a distinction between the types of service is to be maintained the definition of eligibility for each stream needs to be consistent with social security law. This is to ensure that people are not forced to participate when services are not able to help them.

Almost 50 per cent of participants in DES are mature-aged (50+), and many have been required to participate in employment services for extended periods already. The structural barriers that prevent them from realising ongoing employment should be recognised so that they may receive flexible services. EJA is aware that many people in this age group experience mandatory participation in employment services as a form of harassment and bullying, while receiving no benefit from their participation

There is a need to ensure that the definition for participation in flexible services includes long term unemployment and/or disability. In addition, 40T of the Administration Act also allows for a determination to be made to set out exceptional circumstances where a person is not required to satisfy the employment pathway plan requirements, and the basis by which they may not need to/or not participate in either flexible or intensive services, either as a volunteer or not.

Recommendation 17: Define DES program streams in legislation and amend relevant determinations to provide for exemptions from both DES streams where they are unlikely to provide benefits.

Appointment frequency

Q. What should count as a contact for the purposes of the Intensive and Flexible Service offers?

A. The specification of appointment and contact frequency for both intensive and flexible services are too prescriptive. The ED provides guidance on appointment and contact expectations for Intensive Services and Flexible Services. The appointment and contacts for intensive services are:

at least 6 contacts over each 3-month period with Participants in the Intensive Service; and at least 2 contacts over each 3-month period with Participants in the Flexible Service.

EJA is aware that DES providers have been setting appointments too frequently (i.e. weekly or fortnightly) without regard to the participant's particular circumstances or preferences, or the length of time they have been unemployed. We are aware of many cases where people with disability have been threatened with compliance when they have been unable to attend face-to-face appointments, and this should not continue.

The cost of attending appointments is prohibitive for people with disability on very low incomes. Appointments and contacts can far more easily be facilitated using online or telephone servicing, which is often more suitable for many people with disability. This is not only an issue for people residing in regional and remote areas as the ED suggests would be when non face-to-face options would be provided.

The frequency of contact and appointments should be participant led. Frequent contacts might be beneficial in limited circumstances, for example, when a participant requests them, but they should not be used as measures to 'hassle' people to get off payments quickly by taking the first available job. Contacts could also vary over phases of service such that a series of appointments at the beginning of an employment preparation period might be beneficial, while later in the service, it would not have to be as frequent.

Recommendation 18: Ensure that the time and cost of attending appointments is factored in, such as petrol and public transport, as a consideration in planning an approach, including the impact of disability on the ability to travel to appointments.

Recommendation 19: Reduce the prescriptive requirements in the Exposure Draft regarding frequency of appointments to allow for more flexibility of the appointment/contact schedule.

Recommendation 20: Make explicit the options for flexible scheduling of appointments, foregrounding the needs of participants and tangible benefits to participants.

Program of support requirements

Many DES participants are on job seeker payments because they have not met the unrealistically high requirements for DSP eligibility and or are mature aged. They have not chosen to be in DES or to have mutual obligation requirements and experience the DES system as coercive as reported to the Workforce Australia inquiry.

On page 58 of the ED it suggests that Program of Support participants will not be subject to compliance.

A Participant receiving Services to satisfy Program of Support requirements as part of the Disability Support Pension claim process are not subject to compliance actions but may jeopardise their eligibility for the Disability Support Pension if they fail to participate.

Recommendation 21: Clarify the intent of this clause to spell out more clearly what elements of DES people undertaking a Program of Support are required to complete e.g. entering into a job plan, meaningful engagement and whether compliance under the TCF will be applied.

Recommendation 22 Ensure that DES program guidelines reflect the intent that people undertaking a program of support are not subject to payment suspensions, demerits or payment penalties under the TCF.

Digital servicing

Participation in employment services now requires people to have a device and to be online. It is important that people can afford to be online and receive the training they need, or to opt out of digital services when they are not suitable for them.

Recommendation 23: Introduce a digital allowance for people receiving income support payments to assist them with purchasing phones/data, possibly through an increase/or expansion of existing Telephone Allowance to cover the cost of basic internet plans.

Recommendation 24: Give DES participants clear and accessible options to opt-out of digital services, including using online platforms for uploading job search requirements and the monitoring compliance through the Targeted Compliance Framework.

Recommendation 25: Offer DES participants training to use online interfaces when they request it.

Further recommendations from the Workforce Australia inquiry

The Workforce Australia inquiry made other important observations about the mutual obligation framework for people who are long term unemployed, particularly in relation to the impact of disability on duration of unemployment. The Workforce Australia inquiry recommended improving access to sickness allowance and DSP for people long term unemployed to prevent them from being subject to unrealistic requirements. EJA is extremely concerned about the difficulties people with chronic illness, severe injury and disability face qualifying for DSP. For this reason, these recommendations of the Workforce Australia inquiry should be brought forward.

Recommendation 26: Bring forward Recommendation 32 and 33 of the Workforce Australia inquiry to reinstate Sickness Allowance and grant Disability Support Pension for people who are long term unemployed.

Contact

Dr Simone Casey
Senior Policy Officer
simone@ejaustralia.org.au

ⁱ DES TCF Data January 2024