

Submission in Response to the Senate Finance and Public Administration References Committee - Inquiry:

The appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program (CDP)

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1. Introduction

1.1 About Jobs Australia

Jobs Australia is the national peak body for not-for-profit organisations that assist unemployed people to prepare for and find employment. We help our members make the most effective use of their resources and promote the need for services that will help unemployed people to participate fully in society.

We provide an independent voice for members who range from large charitable organisations to small local community-based agencies. Jobs Australia is the largest network of employment and related service providers in Australia and is funded and owned by its members.

Typically, Jobs Australia members do some or all of the following:

- Deliver services under Commonwealth and/or State Government funded programs, such as *jobactive* (including Work for the Dole), Disability Employment Services, Community Development Program (formerly the Remote Jobs and Communities Program), Skills for Education and Employment, Transition to Work, Parents Next and similar State Government programs.
- Deliver accredited or non-accredited training for unemployed people as Registered Training Organisations, Group Training Organisations, apprenticeship centres, social enterprises and other not-for-profit training and education institutions.
- Deliver similar employment and related services to unemployed people without any government funding.

1.2 About this Submission

The views expressed in this submission are the views of Jobs Australia. While our views are informed by our consultations and meetings with CDP providers, they should not be taken to be the views of any particular provider or group of providers.

2. Introduction

Since the Community Development Program commenced in July 2015, there has been an alarming rise in the number of financial penalties being applied to its participants¹.

Jobs Australia holds grave concerns that CDP is causing unnecessary financial hardship, exacerbating poverty and doing more harm than good in remote Australia. In August-September 2016, Jobs Australia conducted a workshop with more than 30 stakeholder organisations, who were invited to identify the current challenges in CDP and to imagine how things could be different and better. The principles for necessary reform which emerged included²:

- Less onerous and fairer requirements, so most participants could meet them most of the time;
- Simpler administrative requirements for participants and providers;
- Participants having enough money to pay for necessities; and
- Communities being empowered to make decisions about how the program operates locally.

A strong consensus emerged that a new program is needed, a program which is developed through a genuine process of broad consultation and engagement with Aboriginal and Torres Strait Islander people and communities. Any future changes need to occur with the support of communities that are affected, based on building capacity and capability, rather than systems that undermine them.

¹ Fowkes, L. (2016). Impact on Social Security Penalties of Increased Remote Work for the Dole Requirements, Working Paper 112/2016, Centre for Aboriginal Economic Policy Research, Australian National University, Canberra, viewed 29 April 2017, <http://caepr.anu.edu.au/Publications/WP/2016WP112.php>

² Jobs Australia (2016). What to do About CDP, viewed 29 April 2017, <https://www.ja.com.au/node/197094>

3. Responses to the Inquiry Terms of Reference

The appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program (CDP), with special reference to:

- a. the adequacy of the policy process that led to the design of the CDP.

Objectives

In December 2014, the Minister for Indigenous Affairs announced major reforms to the Remote Jobs and Communities Program (RJCP). The key objective was putting an end to “sit-down welfare” in remote Australia. The reforms included “work-like” Work for the Dole activities for the majority of remote job seekers for 25 hours per week over five days a week, 12 months of the year. The changes were to be rolled out carefully and methodically, not rushed, over 12 to 18 months. The Minister was “committed to not disrupting communities by repeating the mistakes of the past”.

Minister Scullion announced at the RJCP provider forum in March 2015 the changes that would lead to the implementation of the renamed Community Development Program (CDP) in July 2015. He said we needed to move people away from the damage of passive welfare, that not enough people were being placed into jobs, and not enough employment outcomes were being achieved. He said we needed to ensure there are opportunities for transition to real full-time jobs with real full-time wages, such as were available through the Indigenous Rangers program.

At the forum providers were told that continuous Work for the Dole would build work readiness, develop skills and experience. Work for the Dole was not intended to be a destination, but a pathway to “proper work”. Minister Scullion told the forum that more “innovative” activities were needed - like some that used to occur under the old CDEP program. Examples given of innovative and meaningful activities were care for the aged, care for people with disabilities, transporting and supporting children in school and housing repairs and maintenance. The idea was that local people would get the skills needed to do local jobs, instead of filling them by people outside of local communities.

Providers were also told there would be less red tape and simpler arrangements for payments, under the new CDP.

While many of the stated objectives of CDP were sound, in June 2017 it is doubtful that they have been achieved. Work for the Dole has become a destination for many in the absence of genuine employment opportunities. Still not enough local people are being placed into jobs, nor enough employment outcomes being achieved. Implementation of CDP caused major disruption through tougher participation requirements and higher rates of financial penalties for participants. And the program is significantly more administratively complex and onerous for providers compared to the previous RJCP and all of its many predecessors. This is largely due to the requirements to monitor and report on attendance at Work for the Dole, recommend the application of penalties to re-engage participants, and to ensure their own compliance with the CDP provider performance management framework.

Policy Process

The policy process that led to the design of CDP was centralised and top down. The process did not involve open and transparent consultations with the communities that would be affected by its implementation or with providers. This is entirely inconsistent with the Prime Minister's promise that the government will do things with and not to Indigenous peoples and communities and long-established and proven principles of effective people-centred development. From the outside, it also does not appear to have involved much input from PM&C's own regional network staff. At the CDP forum in March 2015, providers were given hard copies of a new draft RJCP Deed, which proposed considerable changes to program activities and emphasis, participant obligations, the funding model and the performance management framework. Significant operational detail was not made available and it was apparent that many PM&C staff knew little of the policy up to that point.

The emphasis on Work for the Dole in CDP is not supported by evidence. An evaluation of Work for the Dole prepared for the Department of Employment in 2014-15 in non-remote areas found that it resulted in only an additional 2 percentage point increase in the probability of job seekers getting a job³. The employment benefits of Work for the Dole are marginal at best in non-remote areas. In remote areas, with limited labour markets, the benefits are likely to be even lower. This is exacerbated by the CDP payment model that rewards providers more for keeping somebody in Work for the Dole than getting them a job and an employment outcome.

RJCP had only been in operation less than three months, and Senator the Hon Nigel Scullion had been Minister for Indigenous Affairs for only one month, before he declared it in October 2013 to be in "crisis" and "a complete disaster"⁴. In late November 2013, Minister Scullion announced that immediate changes would be made to the program, which he described as "poorly designed and badly implemented"⁵. He signalled that the Community Development Fund would be used to fund participant activities, backed by "robust compliance measures".

The five year RJCP program had barely started, let alone been given time to be properly evaluated, before the groundwork had been laid for its overhaul and replacement.

Design

CDP has mainly served to increase the efficiency of applying financial penalties to participants who do not attend Work for the Dole. The surge in harmful financial penalties is attributable to two design features of CDP.

The first of these is the onerous Work for the Dole participation requirements that CDP imposes upon its participants in order to receive income support. CDP participants aged 18-49 must attend supervised Work for the Dole activities for 5 hours every day, 25 hours every week, for 46 weeks

³ Kellard, K., Honey, Dr N. & McNamara, T., (2015). Evaluation of Work for the Dole 2014-15, The Social Research Centre, viewed 6 June 2017, <https://docs.employment.gov.au/node/35376>

⁴ Karvelas, P. (2013). 'Aboriginal jobs program a complete disaster: Scullion', *The Australian*, 18 October 2013, viewed 29 April 2017, <http://www.theaustralian.com.au/b16a123e6d74>

⁵ Scullion, N. (2013). *Immediate changes to the Remote Jobs and Communities Programme*, media release, 29 November, viewed 29 April 2017, <https://ministers.dpmc.gov.au/scullion/2013/immediate-changes-remote-jobs-and-communities-programme>

each year. These requirements are much harder to meet compared to those that apply to most unemployed people in non-remote areas, who only have to attend Work for Dole after 12 months unemployment, for 6 months per year.

The second design feature of CDP that gives rise to high rates of financial penalties is how providers are paid on the basis of attendance. To get paid for managing participants in Work for the Dole, providers must report daily attendance and recommend financial penalties for those who do not attend with a valid reason. The focus on attendance and subsequent penalties for non-attendance is reinforced by a performance KPI target of 100% attendance of all Work for the Dole participants in activities.

The appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program (CDP), with specific reference to:

b. the nature and underlying causes of joblessness in remote communities.

The biggest cause of remote joblessness in remote communities is weak labour markets and a lack of job opportunities, especially for Indigenous people. CDP providers consistently report that the total number of jobs in their remote communities is far lower than the number of participants on their caseloads. The few jobs on offer are often filled by people more highly skilled or qualified - often non-Indigenous and from outside the community.

Indigenous people in remote Australia are doubly disadvantaged. First, Indigenous people experience poorer outcomes than non-Indigenous people, wherever they live. But also on many indicators, such as school and skills attainment, health, youth engagement, employment and participation in the labour force, their level of disadvantage tends to increase with remoteness. Other barriers that inhibit opportunities include disability, mental illness, alcohol or substance abuse, lack of transport, offending, incarceration and discrimination. In remote regions there is also a lack of assessment and support service to diagnose and address these barriers to participation and employment.

The multitude and complexity of barriers and lack of support to address them, combined with the lack of jobs on offer means that life on income support is a realistic prospect for many Indigenous people in remote communities. On the labour demand side, much more investment is needed in infrastructure and services to create more job opportunities. On the supply side, significantly more investment is needed in skills, education and support services.

Without significant additional investment in job generation in remote communities, the premise underlying full year, full-time and continuous Work for the Dole - serving as preparation to take up job vacancies which don't presently exist and which are highly unlikely to exist in the future - is a false one. It is a false premise which doesn't provide sufficient or compelling reasons to justify the obligations being placed on program participants and the penalties which are imposed when they fail to meet them.

The Job Guarantee proposed by the Centre of Full Employment and Equity⁶, which was supported by Jobs Australia and which is recommended a more recent report⁷ from Per Capita – provide a useful and relevant base from which a Job Guarantee could be implemented – within the framework proposed by APO NT.

Regardless of logos, acronyms, funding models, providers and guidelines and all of the other accoutrements of any labour market program, if we are to make the progress that Indigenous people and communities want, need and expect in terms of getting rid of pervasive and unacceptably high

⁶ Cook, B., Mitchell, W., Quirk, V. & Watts, M.,(2008). Creating effective local labour markets: a new framework for regional employment policy, Centre of Full Employment and Equity, the University of Newcastle, Callaghan NSW, viewed 9 June 2017, http://e1.newcastle.edu.au/coffee/pubs/reports/2008/CofFEE_JA/CofFEE_JA_final_report_November_2008.pdf

⁷ Smith, W. (2017). Unemployment Policy in Australia: A Brief History, Per Capita, Melbourne, viewed 9 June 2017, <http://percapita.org.au/research/unemployment-policy-australia/>

unemployment, there will need to be very significant and ongoing investment at the core of whatever future strategy the government of the day chooses to adopt.

The appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program (CDP), with specific reference to:

- c. the ability of the CDP to provide long-term solutions to joblessness, and to achieve social, economic and cultural outcomes that meet the needs and aspirations of remote Indigenous people.

While it has been less than two years since the CDP was introduced, the program does not appear to have made obvious and significant inroads in providing long-term solutions to joblessness. It has not significantly raised the level of employment, or the capacity of remote Indigenous people to compete successfully for the jobs on offer. While Work for the Dole was never intended to be a destination, it has become one for most CDP participants. Indigenous people in CDP are much more likely to get a financial penalty than get a job.

Indigenous people living in remote communities often have strong collective obligations to family, community and culture. These obligations can sometimes come into conflict with paid employment and obligations to participate in CDP activities in order to receive income support. This means that individually-centred notions of paid work and earning income are not always seen as the be all and end all. For many, participating and engaging meaningfully in their community does not necessarily equate with participation in CDP in order to receive payments from Centrelink. In order to succeed, more local buy-in is needed.

A different approach to creating opportunities for meaningful working lives in remote Australia is needed, which:

- is identified and led by the local community, in partnership with all levels of government;
- addresses the lack of jobs in remote communities and the lack of diagnostic assessment and support services;
- includes a paid wage component, such as the former CDEP program or the recently proposed new APONT model;
- provides more and long-term investment in remote economies to create new employment opportunities and also in developing the capability of the people to fill the jobs on offer.

The appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program (CDP), with specific reference to:

- d. the impact of the CDP on the rights of participants and their communities, including the appropriateness of the payments and penalties systems.

CDP is having a significant negative effect on some communities. Remote job seekers in CDP are penalised far more often than non-remote job seekers. Despite representing fewer than 5% of the total number of job seekers subject to income support penalties, CDP participants receive more than half of all financial penalties applied to all job seekers nationally.

The high rates of financial penalties being applied are having negative impacts for individuals, their children and families, and for their communities more broadly. Reports have emerged of people going without food, sniffing substances to suppress hunger pains, reduced food sales and increases in poverty-related crime, such as food store break-ins.

The former Aboriginal and Torres Strait Islander Justice Commissioner Mick Gooda expressed concern that the more strenuous Work for the Dole requirements in CDP may give rise to discrimination⁸. This is because they are imposed on a predominantly Indigenous population, as the proportion of Indigenous participants in CDP is over 80%. Further, the Shire of Ngaanyatjaraku has lodged a complaint with the Human Rights Commission about CDP.

The Australian system of employment services and income support is intended to support people and alleviate poverty. Instead CDP is causing unnecessary financial hardship, exacerbating poverty and doing more harm than good in remote Australia.

CDP is excessively punitive and compliance driven. A different approach to engagement is needed, that builds on people's strengths and offers positive rewards for participation.

⁸ Gooda, M., (2015) *Social Justice and Native Title Report*, 2014–15, Australian Human Rights Commission, Sydney, accessed 6 June 2017, http://parlinfo.aph.gov.au/parlInfo/download/publications/tables/papers/bd889f56-da22-46cc-9436-a65dfa6e58ee/upload_pdf/SJRNTR2015.pdf;fileType=application%2Fpdf#search=%22publications/tables/papers/bd889f56-da22-46cc-9436-a65dfa6e58ee%22

The appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program (CDP), with specific reference to:

- e. the funding of the CDP, including the use of unspent funds in the program.

Work for the Dole

The funding of CDP is overwhelmingly tied to Work for the Dole. Approximately 80% of CDP funding to providers is tied to job seeker participation in Work for the Dole activities. Providers receive a maximum of around \$13,700 per year for each participant, depending on their level of active participation. In contrast, providers receive around \$8,300 for each 26 week employment outcome. So the payment model creates a perverse incentive for providers to keep people actively participating in Work for the Dole rather than getting a job.

Administrative Complexity

Work for the Dole service fee payments are linked to attendance and compliance action and re-engagement of non-attending participants. In order to receive Work for the Dole Service payments, providers must meticulously report daily on each participant's attendance at Work for the Dole, and submit participation reports through the IT system. This places an enormous administrative burden upon providers, and diverts resources away from front line services.

In the past, many providers have reported to Jobs Australia that they have struggled to understand how Work for the Dole activity payments to them are calculated and linked to performance. Part of the confusion is due to Centrelink suspensions of participants' mutual obligation requirements, which impact upon the level of payments to providers. Another reason is that the IT system was never originally intended to pay providers according to Work for the Dole attendance, and it strained under the huge upsurge in administrative transactions needed to meticulously record attendance or submit a participation report to DHS.

The reports that providers have access to are different from those that PM&C actually use to calculate payments. They contain many discrepancies which make it difficult for providers to trust the data used as the basis for payments. This lack of trust in the data is of even greater concern given that it underpins the measurement of provider performance under the performance management framework.

Quality of Activities

Before the implementation of CDP, providers were able to secure upfront access to the RJCP Participation Account to fund quality activities. Under the CDP funding model, payments for activities are now tied to engagement and attendance of individual job participants. The reduction in funding certainty has meant that some providers have found it more difficult to offer quality activities. Many activities are run on shoe-string budgets, which impact upon their quality. For providers that are maximising their Work for the Dole payments, activity quality is improving, but for providers still struggling with the funding model, they are less able to invest in quality activities. This is particularly the case with activities that involve training embedded within them.

Changes to Outcome Payments

Outcome payments to providers are tied to active engagement of participants in activities and the achievement of 13 and 26 Week employment outcomes. Many providers report that the emphasis on 13 and 26 weeks does not reflect the reality of the work available in weak remote labour markets. In remote areas, long-term full-time work is scarce while short term seasonal and contract work often provides the best opportunities for employment. When RJCP was replaced by CDP, payments for job placement, 7 week employment outcomes and education outcomes were abolished, while the time allowed for breaks in employment were significantly reduced. The changes to outcome payments under CDP made it much harder for providers to achieve paid outcomes.

High Rate of Financial Penalties

The disproportionately high rate of financial penalties applied to CDP participants reduces income support payments to individuals and their families, with devastating impacts. The penalties also impact on local businesses and local employment opportunities by reducing the amount of money in local economies.

Abolition of the Community Development Fund

The decision to roll the RJCP Community Development Fund (CDF) funding into the Indigenous Advancement Strategy (IAS) reduced the focus on supporting employment, participation and community development opportunities that had been identified locally. These opportunities were set out in Community Action Plans (CAPs), which had been negotiated by RJCP providers with their communities. The impact of this decision was reduced local input and a more centralised approach to decision making about funding priorities. The Australian National Audit Office (ANAO) found earlier this year that the IAS was not effectively implemented, with applications not assessed according to guidelines. The short implementation timeframe affected the PM&C's ability to establish arrangements and structures that focused on prioritising the needs of Indigenous communities⁹.

CDP Youth Employment Scheme

While the recently announced CDP Youth Employment Scheme is welcome in many respects, concerns have been raised that the process has been undertaken in an inappropriately short timeframe.

Providers were asked to sign and return a letter of offer for an Ancillary Payment of \$150,000 (GST Incl.) for each of the regions they service through CDP. The funds are for the development and implementation of a youth engagement strategy in collaboration with local schools.

The period of time given to consider, sign and return the offer was approximately 10 days. While providers were given an implementation plan template that identifies the stakeholders to be consulted, recruitment and retention strategy, strategies and activities to be implemented and

⁹ Australian National Audit Office, 2017. Indigenous Advancement Strategy, viewed 7 June 2017. <https://www.anao.gov.au/work/performance-audit/indigenous-advancement-strategy>

desired outcomes, completing the template was not a requirement in order to secure the payment of \$150,000. The amount is paid upon receipt of the signed offer. Providers are also required to submit a budget for the project to the Department within two weeks of commencement of the project.

The process does not allow time for quality proposals to be developed in consultation with local stakeholders and involve a rigorous funding application process. Instead providers are being given money and then required say how they are going to spend it later.

The appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program (CDP), with specific reference to:

- f. the extent of consultation and engagement with Aboriginal and Torres Strait Islander communities in the design and implementation of the CDP, and the role for local decision making within the program.

The design of CDP was top-down. It was not informed by an open and transparent process of consultation with Aboriginal and Torres Strait Islander communities. Little is known of the consultation and engagement that occurred selectively and privately at the community level.

By way of contrast, the previous Remote Jobs and Community Program (RJCP) was developed after several extensive rounds of community consultation. These included consultation in remote communities, opportunity for public submissions and with the advice of an Expert Panel comprising Indigenous leaders, employment services industry representatives and a representative from the Minerals Council. In 2012 DEEWR visited most major communities and talked to stakeholders including job seekers and peak bodies.

A lack of transparent and formalised consultations with communities and providers has continued to be an ongoing issue with the development of CDP and proposals for further reforms. Consultations with providers have occurred privately and infrequently via a hand-picked reference group. All - provider meetings with PM&C until very recently have focussed on implementation issues, rather than genuine opportunities for consultation about the direction and impact of the program.

In December 2015, the Minister introduced a Bill to further reform CDP and Social Security arrangements in remote areas, but again there was no formal consultation process about the proposed changes beforehand.

In March 2016 a Senate inquiry into the CDP Bill found:

The Committee does not doubt that the meetings and conferences that have taken place so far with CDP providers and stakeholders have been undertaken with the best intentions. However, the Committee has questions as to whether they have necessarily constituted proper consultation on the proposed reforms in the bill. Going forward, it is necessary for the Minister, and more particularly officers of PM&C, to work with communities and providers on measures to be included in the relevant legislative instruments¹⁰.

There is some role in CDP for local decision-making in the program, but it is limited to the type of Work for the Dole activities on offer. There is no opportunity for community input into the overall design of the scheme, which has an overarching and inflexible emphasis on compliance with full-time Work for the Dole.

¹⁰ The Senate, Finance and Public Administration Legislation Committee, (2016). Social Security Legislation Amendment (Community Development Program) Bill 2015, March 2016, viewed 2 June 2017, http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Finance_and_Public_Administration/Social_Security/~/_media/Committees/fapa_ctte/Social_Security/report.pdf

The appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program (CDP), with specific reference to:

g. alternative approaches to addressing joblessness and community development in remote Indigenous communities.

An alternative approach to joblessness and community development in remote Indigenous communities is needed, based on:

- Less onerous and fairer requirements, so most participants could meet them most of the time;
- Simpler administrative requirements for participants and providers;
- Participants having enough money to pay for necessities; and
- Communities being empowered to make decisions about how the program operates locally.

The previous Community Development Employment Projects (CDEP) program pooled unemployment benefits to create local employment opportunities in remote communities where the labour market might not otherwise offer employment. Strengths of this program included positive incentives for participation through paid employment, investment in physical infrastructure and skills development, and empowerment of local communities. While CDEP was not universally successful in all communities, it points the way towards what can be achieved.

Jobs Australia has strongly endorsed the recently developed Aboriginal Peak Organisations of the Northern Territory (APO NT) Remote Development and Employment Scheme as an alternative to the current CDP. The proposal has been developed in consultation Aboriginal organisations, national peak bodies and CDP providers, and offers a better solution to the provision of employment services in remote Australia – one which should be the subject of broader consultation with all affected remote communities, with other peak and stakeholder organisations and with current CDP providers.

The key elements of the proposed Remote Development and Employment Scheme include investing in the creation of paid employment at award wages, local community control, flexibility and fairness in mutual obligation, and oversight by an independent body with an Indigenous-led board. The new APONT model takes a long term investment approach to economic and community development. It builds on the strengths of the former CDEP program, but it also addresses perceived concerns about CDEP being a destination by limiting the holding of jobs for a period of up to five years. There is less emphasis on administration, and more on empowering and strengthening communities to create meaningful opportunities for participation, based on people's individual capacity and needs.

The appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program (CDP), with specific reference to:

h. any other related matters.

Recent statements published in the media and at the CDP Provider Business Meeting in Cairns on 1 June 2017 demonstrate that Minister Scullion remains committed to changes that were previously contained within the lapsed *Social Security Legislation Amendment (Community Development Program) Bill 2015*.

The proposed changes would see core Centrelink functions (such as payment of income support to participants, determination of reasonable excuse following absences and application of financial penalties) transferred to contracted CDP providers. These changes represent a fundamental, risky and highly undesirable shift in the locus of decision-making on income support matters which is unprecedented and which would transfer significant risks and costs to providers, including increased threats to staff safety and making fair and accountable decisions about the personal circumstances and capacity of participants to comply with mutual obligation requirements. Jobs Australia's opposition to this proposal is outlined in our previous submission to the Senate Finance and Public Administration Legislation Committee Inquiry into the CDP Bill¹¹.

¹¹ Jobs Australia, (2016). Submission to the Senate Finance and Public Administration Legislation Committee Inquiry into the Social Security Legislation Amendment (Community Development Program) Bill 2015, viewed 8 June 2017, http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Finance_and_Public_Administration/Social_Security/Submissions