

REMOTE EMPLOYMENT AND PARTICPATION

Discussion Paper Response

This response has been prepared on behalf of the Board of Directors of The Arnhem Land Progress Aboriginal Corporation and in consultation with ALPA's directors, staff, CDP participants and community & cultural leadership from the Yolŋu communities in which we deliver services.

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Who We Are

The Arnhem Land Progress Aboriginal Corporation was formed in 1972 as a collective of seven community controlled stores, ALPA's initial member communities were Ajurumu, Gapuwiya, Galiwin'ku, Milingimbi, Minjilang, Ramingining and Yirrkala. ALPA borrowed almost $1m to upgrade plant and equipment, and the early successful operation of the stores enabled the loan to be repaid within three years. Since that time ALPA has been financially independent, owned by our Yolŋu members and governed by a Yolŋu Board of Directors.

In the 1970s ALPA began to realise the importance of training and development for its staff, and with support from the Queensland Retail Training Institute began a program of in-house training. The Training School at Galiwin'ku was built to support this. During this period we also started our Benevolent Programs, using the modest surplus funds generated from store operations to benefit the community. Financial assistance for ceremonies, education, medical escorts and community events could be obtained through these programs which have now been expanded to involve capital investment in business partnerships and business support for independent social enterprise development.

ALPA became a Registered Training Organisation in 1992 and is committed to staff training. Over 1500 of our remote Indigenous staff have completed apprenticeships or qualifications through ALPA, this dedication to quality training outcomes saw ALPA recognised as the NT Large Employer of the Year at the NT Training Awards in both 2015 and 2016 and placing in the top three at the subsequent National Awards in the same category in both years.

Since 2002, the organisation has expanded through its Australian Retail Consultancy arm, running stores on behalf of, and in partnership with, other Indigenous community organisations. This model has given those communities access to ALPA's systems and processes, training, nutrition program and group purchasing. This partnership approach allows these communities to maintain ownership and control of their business but with the expertise and support of an experienced Indigenous partner.

In 2013 the Board of Directors made the decision that it was time for ALPA to diversify from retail and work with the Government and industry partners to increase the economic opportunities for our Yolŋu members. We commenced by taking on the RJCP region encompassing our member communities of Ramingining and Milingimbi. Our board quickly recognised the ability to support positive change in our communities through these programs and over the last five years our community services footprint has grown to two CDP regions, nine RSAS teams, a self-funded Youth Development program and becoming a registered NDIS provider.

By 2014 we had saturated the existing local labour markets so started working in partnership with local families and traditional land owners to develop new enterprises, create further employment pathways and to strengthen the economies of our communities. To date this has seen the creation of four new Indigenous owned businesses delivering services across a variety of sectors including construction, landscaping, furniture manufacturing, automotive repair, Homelands services, hospitality, tourism, agriculture and cleaning.

In 2018 ALPA operates in 25 communities across a 1.2 million square kilometre footprint, ALPA has over 1200 employees, 85% of whom are Indigenous and ALPA returns over $16 million per year to our member communities in the form of Yolŋu wages, benevolent programs and community infrastructure.

Where We Are Now

The Community Development Programme (CDP) in its current form is focussed on engaging remote job seekers into work and activities that benefit them and their communities.

Whilst the policy design gave consideration to the unique social and labour market conditions found in remote Australia we do not believe that the current programme is fully optimised to support the Australian Government's agenda for increasing employment and breaking the cycle of welfare dependency in the remote communities in which CDP is delivered.

The view of ALPA, which has been reinforced through consultation with a variety of CDP staff, CDP participants and community leaders, is that whilst the current programme design has the ability to support transformational life changes for many participants it does not meet the needs of all participants, nor is the scope of the programme sufficiently broad enough to fully realise the potential positive net impact the programme could have throughout the communities in which it is delivered. During our consultation this view was put forward not only in the context of CDP but on how remote services are delivered in general.

There are core elements of the current CDP design that we believe should be maintained in any future program design, these include:

Flexibility:	A key to supporting participants to gain and maintain employment has been the flexibility to provide tailored support appropriate to their aspirations and make investments which align to them.
Industry Links:	Whilst the structure of Host Agreements are not perfect ALPA believes that working closely with employers to provide industry immersion in short term work experience internships is essential to creating clear and defined employment pathways, developing enterprise skills and reducing the perception of risk for both participants and employers.
Long Term Contracts:	Five year contracting arrangements have allowed organisations to invest in building organisational and staff capability, to work with communities to develop long term strategies and make investments over this period of time to realise them. This has enabled comprehensive workforce development strategies to be executed and new enterprises and sectors to be created resulting in hundreds of new sustainable jobs for our participants.

There are however key elements of the current CDP design that we believe present opportunity for significant improvement in the design of any future remote employment and participation model:

Daily Participation:	The expectation to participate daily is not reflective of many of the work environments in our communities. It also puts significant pressure on participants' family and cultural responsibilities. Flexibility in how participants meet their mutual obligation week to week would increase participation rates and reduce penalties.
Deficit Approach:	The current program relies too heavily on compliance measures and financial penalties as the primary lever for behavioural change. We do not believe this methodology has been effective as a motivator considering the collectivist nature of the communities in which we work and this has increased long term-disengagement. A strength based approach and an increased focus on incentives should be key components of any new model.

Where Are We Going

ALPA welcomes the commitment of the Minister to design an improved, tailored solution for the delivery of employment services in remote Australia. The proposed outcomes and principles are exciting and ALPA believes that if they are realised a more inclusive service will be delivered for participants with increased support and improved pathways to employment. We will offer our views on these proposed reforms in full later in the paper.

Whilst these reforms will represent a positive change in the way that employment services are delivered in remote communities we believe that in isolation they can only go so far in meeting the key identified objective of increasing the prosperity of remote Australia. We believe we can work with Government to be bolder and accelerate change in our communities.

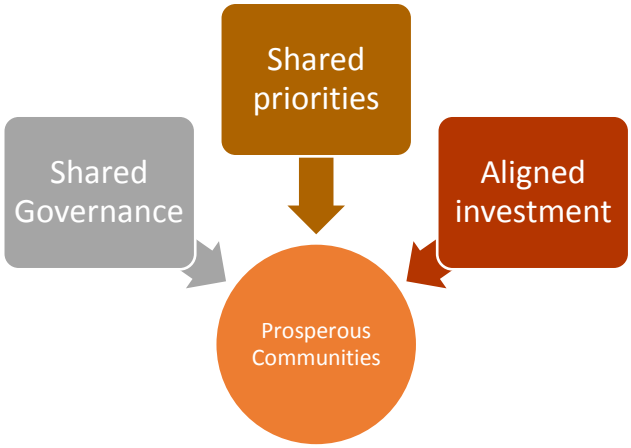
There is an opportunity to utilise this reform process and the ongoing Closing the Gap refresh to undertake a deeper review of how we define success in remote communities and how it can best be achieved. This view has been reinforced through our consultation on both the CDP reforms and the Closing the Gap refresh, with many Indigenous leaders identifying a common strategy to improve outcomes across remote Australia.

The opportunity is to move towards an integrated approach to service delivery of which remote employment and participation services form one aspect, on a community by community level, driven by a holistic strategy led by local Indigenous governance structures and underpinned by a coordinated whole of Government approach to remote investment.

The Opportunity: Shared Governance, Shared Priorities. Aligned Investment

Where previous frameworks attempting to drive coordinated investment and service delivery have fallen has been in the top down approach to establishing priorities, with a focus on process and procedure without creating the necessary authorising environment to drive trust-based engagement between players, innovation in funding and responses. Communities have been viewed as beneficiaries of the processes, as opposed to activity decision maker and influencers within it. Governments have not been given the ability to innovate or try new things in their engagement, or application of funding guidelines and arrangements. We propose an arrangement that allows for these things to occur.

The opportunity we see is to facilitate better engagement, stronger collaboration and more targeted investment through supporting a local approach to investment. It will create innovation through an iterative approach that sees parties focused on achievement of results against shared priorities.



The foundation of this approach must be the use of a governance structure within our communities. One which is representative of the community, is formally recognised by all levels of Government and is trusted to make key decisions about the identification of priorities and strategies for implementation at a community level. The governance structure would be empowered to contribute to the development of priorities at a local level.

If communities and cultural leaders were supported to identify the correct representative leadership group in each community they could regularly meet with Government delegates to identify key short, medium and long-term priorities for both the community and Government and in partnership develop a strategy to address them.

As priorities are identified, genuine shared success measures, aligned to local Closing the Gap targets, data gathering mechanisms and transparent reporting and evaluation would be developed. This appropriate and consistent methodology for evaluation would be applied to inform refinement of strategy and continuous improvement of service delivery.

If a common leadership group is recognised by all levels of Government as well as service providers we will see significantly increased engagement and participation from community leaders, especially once they see their advice and support acted upon and realised as realised as actions and outcomes in their community. Once a strategy has been agreed consideration should be given to which jurisdiction or service provider is best placed to support the implementation activities derived from the strategy based on their respective resources and expertise. This integrated approach would address the sometimes disconnect between State and Territory services, those offered by the Commonwealth and those provided by non-Government organisations, ensuring that all services delivered in remote Australia are aligned with a common strategy on a community by community basis.

A coordinated approach to investment would ensure that these services are adequately resourced to be successful and that there is a consistent approach throughout the community, without duplication of services or investment in programs with significant overlap. This approach to investment in remote communities will ensure infrastructure and resources are fully optimised in alignment with the strategic priorities of the community. Government departments must be given flexibility to innovate in program and funding design where this occurs.

This approach would allow the growth and specialisation of local Indigenous businesses not only to deliver key services across multiple jurisdictions, but to undertake ongoing evaluation work, providing an immediate increase in sustainable employment for Indigenous people within their community.

In addition to increasing localised decision making and empowering communities this approach supports stronger stakeholder relationships and increased visibility over which/how services are being delivered in community. It will lead to reduced touchpoints for community members, elimination of duplicate services realising cost efficiencies and allowing a more efficient investment in meaningful services to enable transformational change in the communities in which we work.

This approach could be applied across all sectors and key Government areas of priority, providing a local mechanism to support culturally appropriate and locally relevant strategies to implement Government policy on a community by community basis. This community ownership of how services are delivered, what success looks like and how it is measured will ensure that services are tailored to the specific needs and priorities of the community. Coordinated investment will ensure strategies are adequately resourced and realise efficiencies in delivery. A well-resourced strategy which is owned by the community and delivered in

partnership with Government is significantly more likely in being delivered successfully to support Closing the Gap and increasing the prosperity of remote Australia.

DESIGN PRINCIPLES

A more simplified system, relying less on a national welfare system, and more on local control and decision making.

Removing the complexity around compliance and simplifying interactions with Centrelink to create a simpler, more flexible and tailored approach will be welcomed by staff and participants alike. Any future model should be reframed to depart from a deficit approach and move to strength-based methodology, should reduce touch points with Centrelink and should have local governance structures built in as a formal component of service delivery.

Reinvesting any efficiencies back into communities, for example through 'top up' arrangements for job seekers.

ALPA welcomes any investment into communities as long as the investment is aligned to a holistic strategy developed in partnership with the community in which the investment is being made. As well as providing incentives for participants in the form of "top up" these investments could consist of infrastructure, capital to support social enterprise development or funding specialist support services which are currently lacking in many regions.

A wage-based or 'wage-like' model providing weekly payments to job seekers.

Differentiation is required when considering "wage-based" and "wage-like" as each have very different implications for participants and providers in how the programme is administered and delivered. If this principle is to achieve conditions equivalent to the minimum wage for participants in any future programme ALPA is supportive of this as a design principle.

ALPA believes that weekly payments would be beneficial at addressing some of the challenges faced by participants regarding food security and supports this in principal. We believe that in an ideal scenario this decision could be made by the individual participant. If that is not possible from an administrative perspective it is a decision we would like to see deferred to community leadership structures for their consideration.

Streaming jobseekers to enable tailored assistance according to need.

A tiered approach, based on individual capacity could enable a higher level of tailored support however there are two key components that must be considered. Firstly assessments must be improved to ensure that capability and functionality can be accurately and appropriately considered. Secondly streaming should be undertaken through a strength-based approach to ensure that it is positively framed and does not create additional barriers for participants.

Improved access to locally delivered health services to ensure job seekers' barriers and capacity for work are properly identified and appropriate support is provided.

Job seekers need to access services locally that will address their barriers. There is currently a shortage of specialist supports so in many cases we are unable to refer participants to services that could support them to address key barriers. ALPA would welcome further investment into remote Australia to increase access to health and wellbeing professionals based within communities or regularly visiting communities.

Establishing better arrangements for job training and a pathway to real employment.

Engaging job seekers in meaningful work or job training activities with the ultimate aim to transition to employment is the core element of the current programme. ALPA welcomes any improvements that will enable additional resourcing or stronger partnerships with Government and industry sectors to create meaningful pathways to employment.

An example of better arrangements for job training and pathways to employment could be a coordinated approach to investment in this area between jurisdictions so that school students (VET pathway), CDP Participants and existing

employees could access a common service. This would maximise the yield on previous investments in community infrastructure and encourage the development of a co-designed regional workforce development strategy.

This approach would increase the amount of funding available to providers by drawing on recurrent state and territory funding as well as programme funding to create increased economies of scale, reduce administration by multiple agencies and departments and above all increase the volume of and variety of training available allowing for increased individual pathways into employment.

This increased scale and shared strategy would allow providers to take a long term approach to how funds are allocated and they would be enabled to work with industry to be proactive in creating capability for future work instead of being largely reactive to current opportunities. This arrangement would also make it easier and more viable for providers to create long term strategic partnerships with key educational institutions to reduce the cost and increase the quality of training provided in remote Australia.

Encouraging businesses to hire and invest in local people.

ALPA welcomes a reinstatement of a wage subsidy system as consultation with employers throughout our region suggests there is a strong preference for this in comparison to the Employer Incentive Payment currently utilised for this purpose.

In our region employers who are members of the region and have a permanent presence in the region generally employ local people where there is capacity for local people to undertake the tasks. The two larger issues are the lack of incentive to continue staff development to support them to transition beyond entry level roles and the seeming lack of enforceability in some contracting arrangements for external providers of services, particularly infrastructure projects, to employ local Indigenous people.

Delivering subsidised labour for contracting opportunities, while not crowding out existing investment and jobs.

The creation of additional subsidised jobs in regions with limited labour market opportunities is welcomed, as well as providing participants with industry immersion and real employment for the duration of the job these arrangements will allow local Indigenous businesses to test new markets and build capability to undertake further works and deliver new services. Whilst not all projects will prove to have ongoing business viability many will, allowing local Indigenous businesses to grow and new sustainable jobs to be create in remote Australian communities.

***Increasing the number of Indigenous owned and controlled organisations providing services under CDP*.**

ALPA welcome a focus on increasing the number of Indigenous owned and controlled organisations providing services under CDP. We believe that local Indigenous organisations are best placed to take on the role of an anchor institution in their community – reflecting their communities ambitions and values and utilising their history, trust and continuity of service within the community to support them being achieved. The more services that Indigenous organisations are supported to provide the more efficiencies they will realise and the greater their economies of scale. It is also well established that Indigenous organisations are have a much higher rate of employing and training local Indigenous people to deliver these services.

Over ALPA's long history we have supported many local Indigenous organisations across a variety of sectors to build their capability, strengthen their businesses and realise opportunities for growth and diversification. It is integral that the priority when considering servicing arrangements remains providing the highest possible level of service for programme participants. We recognise that in some cases a local Indigenous provider may not have immediate capability and partnership arrangements may be required, we hope that consideration will be given to other Indigenous providers if such a situation should occur.

Equipping Providers to work with local opportunities e.g. providing access to a region-by-region database on the pipeline of jobs available and establishing accreditations to improve understanding of the programme.

ALPA believes that access to this information should be the starting point for the development of regional workforce development strategies informed by industry and all levels of Government. These strategies combined with input

from a representative local governance structure could inform a coordinated whole of Government approach to remote investment on a region by region basis as discussed earlier in the paper

Supporting Indigenous enterprise development, particularly in the delivery of Commonwealth contracts.

Creating more job opportunities and stimulating local economic development through supporting Indigenous business has been a strength of the Commonwealth Governments approach as seen in the significant increase in investment driven by the Indigenous Procurement Policy. A continuation of this approach and any further strategies to increase local Indigenous business delivery of Commonwealth contracts would be welcome.

Q: Do these objectives and design principles sound right? Is there anything else that a remote employment and participation model should aim to achieve?

All listed objectives and principles will support the development of a remote employment and participation model that will allow providers to be more responsive to the needs of participants, undertake a strength-based approach with an increase focus on positive incentives and support local Indigenous businesses to grow and create new economic opportunities in remote Australia.

A principle that ALPA would like to see explicitly stated is that there is a long term focus on supporting community development outcomes that will drive economic development in remote Australia. Without a long-term focus built into the programme the design objective of increasing the prosperity of remote Australia will be difficult to achieve. This principle will reinforce the development of contracting arrangements, a performance management framework and a service delivery model that are structured to enable short, medium and long term outcomes.

As mentioned previously ALPA believes that a coordinated whole of Government approach to investment in remote Australia will significantly improve outcomes for not only participants in Commonwealth programmes and any opportunities for shared governance structures and connectivity with state and territory strategies should be explored throughout this reform process.

OPTION 1 – WAGE BASED MODEL

Q: The option of a 'three tiered' approach in a new model is designed to stream job seekers according to work capacity – will streaming assist in better servicing the caseload and moving people along a pathway to employment?

We believe that streaming can have a positive effect in terms of assisting providers to provide tailored support to participants dependant on their capability to participate and the severity of vocational and non-vocational barriers they are facing.

There is however an inherent risk in streaming that once categorised participants are only offered services which align to a provider's perception of their level of need based on the Tier in which they have been placed. We would like to see streaming applied to the remote context in a similar method to how it is applied to Disability Employment Services. This model encourages providers to develop individual pathways with a tailored selection of supports that are not limited or prescribed based on the stream of the participant. The streaming element of the programme would add value in that providers would have increased flexibility to support participants who are vulnerable or have significant barriers by reducing expectations of mutual obligation whilst maintaining a safety net of welfare support dependant on their individual circumstances.

It is critical that there are significant improvements to the mechanisms currently in place to assess the capability of participants is a tiered approach is to be successful. This model is contingent on participants being referred to a tier

that is reflective of their capability so that they can receive the level of support most appropriate to enable them to successfully transition into employment in the long term. If the assessment mechanism is not fit for purpose and participants are incorrectly assessed this model will not be viable.

Q: Is there merit in moving elements of a new model outside the national income support and compliance system to ensure a simpler and more accessible system for job seekers? If so, which elements?

ALPA does not have the required knowledge of what can and cannot be done within the national income support and compliance frameworks to offer a meaningful response to this question.

We can say with confidence based on consultation and our experience as a provider that the compliance framework as currently applied to the programme is not effective as a lever to drive re-engagement, we believe it has had the opposite effect and led to many participants disengaging from the programme.

This disengagement has also been driven by the challenges our participants are having in successfully engaging with Centrelink over the phone with significant wait times and DHS staff who lack an understanding of the CDP programme and the conditions in remote Australia.

Regardless of whether elements of a new model move outside of national income support and the national compliance framework we believe that providers should play a more active role in the management of these functions and that any opportunity to reduce participant touch points with Centrelink are worth exploring fully.

Q: How could we improve the job seeker assessment process to ensure job seekers are streamed appropriately, their strengths and aspirations are taken into account and their hours match their capacity to work?

The current assessment model is too rigid and is framed from a deficit approach which is not in line with best practice. There is an opportunity to reframe how we consider capability, to move towards a strength based approach and focus on participant functionality and the thinks that they can do rather than the things that they can't.

The two biggest challenges to meaningful assessments in the current framework are the method in which assessments are completed and the limited amount of documentary evidence that is accepted to inform the outcomes of the assessment process.

Currently the assessment process has too much of a reliance on phone and file assessments, these methods are not appropriate when consideration is given to the significant language and communication barriers experienced by many of our participants. They are also not conducive to building the trust and rapport required for participants to be open and give full and honest answers about sensitive issues which can make them feel disempowered or shamed to discuss publically, especially with a stranger. There needs to be an increased focus on face to face interaction or the ability for providers to provide support to the participant during their assessment, either approach will require extra resourcing.

The other issue is the restriction on which documentary evidence is recognised as valid to inform an assessment of capability and functionality. There should be increased flexibility to incorporate medical evidence provided by Indigenous Health Workers or community based nurses as well as testimony from providers and family members.

We believe there are a variety of standard assessment tools which could be adopted by providers to provide consistent and meaningful advice to inform the assessment process. An example of this is the Psychological Assessment for Work Readiness (PAWR) tool developed by Esther House and already utilised in the jobactive space. This tool identifies clients whom either lack the desire or confidence to genuinely seek a job and retain it. This allows providers to time their supports to a participants genuine readiness to change, targeting effort and investment when participants are most likely to achieve a positive outcome. With some contextualisation and a train the trainer approach to implementation a tool such as this could quickly and cheaply be imbedded in the assessment process to measure a participants functional capacity to fully engage in the program or to be referred to employment.

Q: How many (maximum) hours of required activity would be appropriate in each of the tiers? How should hours be structured (e.g. daily or monthly? Flexibility to schedule outside of business hours)?

We believe that in tier 1 there should be flexibility in the required hours of participant in the programme depending on the capability of the individual participant to engage with the programme, the severity of their barriers, the strategy in the provider is utilising to enable increased engagement and how long they have been referred to the programme.

In Tier 2 we believe that participants should undertake 15-20 hours per week with remuneration that reflects minimum wage regardless of whether this is through an enhanced welfare payment or through a wage based model. These hours should be able to be undertaken in a flexible manner over the period of their payment, dependant on whether they are paid on a weekly or fortnightly basis.

In Tier 3 we believe that the minimum hourly engagement should be aligned with Tier 2, this ensures that participants will not perceive that their obligation is increased or that their lifestyle is negatively impacted upon for taking up the opportunity for paid work.

We believe that there should be flexibility to create opportunities for participants to schedule their mutual obligation outside of standard delivery times when it is aligned with industry practices, helps the participant overcome barriers to participation or increases the value proposition of their participation for the broader community in terms of any social outcomes that are achieved.

Q: Should subsidised jobs only be available to Indigenous job seekers or all job seekers in remote Australia?
If these jobs are made available as a component of the program they should be made available to all participants in the programme proportional to representation in the caseload within any respective region. Many of the concerns of the ALPA Board of Directors about the current Community Development Programme relate to the inequity between the participation requirements for participants accessing mainstream services and those in remote who are predominantly Indigenous. ALPA would not like to see inequity built into the design of any future programme, especially between participants in the same region accessing the same service.

OPTION 2 – CDP 2

Q: Should we move to the proposed CDP 2 model?
No.

Q: Which aspects of the CDP Bill should and should not be considered in a new model?
These responses are based upon discussion held with the ALPA Board of Directors in 2016 to inform ALPA's contribution to the CDP2 working group.

Weekly Payments: ALPA believes that weekly payments would be beneficial at addressing some of the challenges faced by participants regarding food security and supports this in principal. We believe that in an ideal scenario this decision could be made by the individual participant. If that is not possible from an administrative perspective it is a decision we would like to see deferred to community leadership structures for their consideration.

Providers Making Payments: ALPA sees no benefit in providers processing payments in instances in which there is not an employee-employer relationship. These funds would need to be transferred from DHS to the provider before being passed onto the participant, this is unnecessary. We see no reason why DHS cannot continue to pay the participant directly, a local provider having increased control over program delivery and whether compliance penalties should be applied can be achieved through an online interface, who physically processes the payment is irrelevant from a design perspective.

Changing Taper Rates: ALPA agreed that changing the taper rates would create an increased financial incentive for participants to take on employment opportunities and would be a positive change.

Reasonable Excuse and Exemptions: ALPA believes that exploration of how these processes can be improved would be valuable in the design of any new approach to employment services in remote Australia. There are existing mechanisms in place for both of these tools within the current CDP framework however it is clear that they are not being successfully utilised. In the case of reasonable excuse this is likely because of the direct link between the use of reasonable excuse in the form of Did Not Attend Discretionary (DNAD) and the process flow for the calculation of provider payments. In the case of exemptions ALPA believes this is again a reflection on the inadequate assessment process to determine participant capability as well as a lack of resourcing and specialist knowledge within DHS regarding CDP participants and the unique challenges experienced every day in many CDP regions.

Community Investment Fund: ALPA welcomes any mechanism for increased investment in remote communities as long as the investment is aligned to a holistic strategy developed in partnership with the community in which the investment is being made. These investments could consist of infrastructure, capital to support social enterprise development or funding specialist support services which are currently lacking in many regions.

Phased Implementation: ALPA agrees that a phased approach to implementation would be beneficial as it ensures communities are only subjected to any programme changes when they are willing and able to transition to the new model. An incremental rollout also offers the opportunity to review and refine the program and respond to key learnings before the programme is rolled out nationally.

OPTION 3 – PROGRAMME IMPROVEMENTS

Q: Should we retain the current CDP model?

No

However as discussed previously in the paper there are some existing components of the current CDP model that are supporting strong outcomes that should be maintained in any new program. These include:

- Flexibility to provide tailored support and invest make strategic investments to support individual and community outcomes.
- A formal mechanism to engage with industry to provide in work experience and create a pathway into employment with reduced risk for both employers and participants.
- Long term contracts which allow providers the confidence to invest in long term strategies at both a participant and a regional level.

DISCUSSION ON PROPOSED OPTIONS FOR A FUTURE MODEL

Q: Which of the model options best suit the needs of remote communities?

ALPA believes that an approach similar to that described in Option 1 will best suit the needs of remote communities.

Tier 1 of this model recognises that not all participants are currently at a stage of life in which employment is a realistic or relevant aspiration. It will allow for increased flexibility in how providers engage with their most vulnerable clients over a period of time to develop strategies to address vocational and non-vocational barriers and increase engagement both within the programme and in society more broadly.

Tier 2 allows providers to provide increased vocational support, offer opportunities for industry immersion and to develop enterprise skills through project based activities within the community. Further clarification is required regarding the construct of Tier 2 as there will be significant implications on the participant and provider experience dependant on whether the participant receives an enhanced welfare payment or a training wage and has an employee-employer relationship with the provider. This will also have implications for how a participant is able to transition between Tier 1 and Tier 2, recognising that there will not always be a linear progression and that a participants personal circumstances can change quickly.

Tier 3 maintains the transition to employment as the key focus of the provider as they provide the same high level of pre and post placement support to participants regardless of whether they enter independently funded jobs or those created through investment as a component of the program.

Based on our experience in enterprise development we strongly recommend that any commercial operations undertaken by provider organisations such as labour hire arrangements are done so with participants employed and paid under the relevant award rather than completing works as a participant and being provided “top up” from any surplus generated through these works. This will ensure that there is a clear delineation between participation and paid employment, create new local jobs, and allow the enterprises to invest any surpluses generated once employment expenses have been met can be invested in the growth of a sustainable business.

As mentioned previously an effective assessment methodology to identify participant capability is essential to the success of a tiered approach and significant improvements need to be made to the current assessment process for this model to be viable.

Q: Is there another option or additional design features than need to be considered?

The key design feature we would like to see given serious consideration is how the Community Development Programme can effectively interface with a more holistic approach to how services are delivered in remote communities.

A community led integrated service delivery model, underpinned by a coordinated investment approach across all levels of Government, has the ability to accelerate and embed positive change, maximise return on investment and allow communities a stronger voice in defining and achieving their priorities as an equal partner of Government.

Q: How could a new model better take into account community, family and cultural responsibilities?

For a new model to better take into account community, family and cultural responsibility their must first be recognition that in a work environment flexibility is provided to employees when these responsibilities arise. Employees and participants alike have busy lives and on any given day many conflicting priorities, participation in this programme is unlikely to be a dominant priority when competing with community, family and cultural commitments so it is illogical to punish participants for making that choice.

A more sustainable approach would be to build increased flexibility into how and when participants can meet their requirements so they do not have to choose between one or the other and can instead do both. This is particularly true in the case of the current requirement for daily participation which does not afford participants the opportunity to undertake additional hours on other days in the period to offset time in which they are unavailable due to other responsibilities.

Further to this consideration should be given to the social importance of many of these responsibilities, the role that they play as social and economic enablers and how they can be recognised as a form of participation that has a tangible value to the community that often exceeds that of the work undertaken as a part of their CDP activity.

Q: How do we ensure greater accountability to community and stronger cultural authority?

This can be achieved by recognising local governance structures, in which ever form community determine is best, to represent their existing cultural hierarchy and decision making frameworks. By engaging with these structures formally, recognising & remunerating members for their expertise, defining community priorities and a strategy to address them, executing the strategy and being accountable to them for the outcomes these frameworks will be strengthened and reinforced and the programme will be underpinned by cultural authority as community leadership will have ownership of how the programme is delivered.

As discussed previously in the paper both ALPA and the community leaders with whom we have consulted believe that there is an opportunity to expand upon this structure to inform a coordinated investment approach from all levels of Government in how services are delivered within communities. This approach will empower communities to make decisions at a local level and ensure that they are appropriately resourced to act upon these decisions in partnership with government and other stakeholders to the betterment of their community.

Q: Does Government have a jobs creation role in remote? If so, how do we ensure subsidised jobs don't become a destination?

ALPA believes that Government should take on a jobs creation role in remote communities. To ensure that subsidised jobs do not become a destination it is important that they have clearly defined outcomes as well as a fixed end point which could be linked to meeting project objectives or achieving a predetermined duration of engagement.

Priority in the allocation of these jobs should be given to regions in which there are limited existing labour market opportunities, they should be aligned with community led strategies and embedded in Indigenous organisations where possible. We believe that the jobs must address a community identified need or priority, should not take the place of any existing employment or funded programs and should be won and lost the same as any other job.

Q: How can we further stimulate the local job market, beyond the inclusion of subsidised jobs in a new model, to incentivise employers to hire local people and support them to stay in work?

The Government has significantly stimulated the local jobs market through the development of the Indigenous Procurement Policy, we have seen this deliver countless new opportunities for Indigenous businesses in our region to increase their service footprint through growth and diversification, this has in turn created many new local jobs.

A continued focus on supporting Indigenous business coupled with a direct investment in subsidise jobs will see an environment in which there are more opportunities than ever before for our participants to be actively engaged in the workforce.

In terms of incentivising employers to hire and retain local staff we recommend that the Employer Incentive Payment is eliminated and wage subsidies are reinstated. Wage subsidies present an immediate tangible benefit for employers from the first day of employment and mitigate the risk currently associated with the provider payment which is reliant on a participant being fully engaged for six months.

Q: How do we create incentives and better connections within a remote employment model to support the establishment and growth of Indigenous businesses?

As mentioned previously we believe that the existing remote employment model is currently successful at supporting the growth and establishment of Indigenous businesses. In many cases this is reflective of a provider who engages with a wide variety of stakeholders in their region to ensure that they have a workforce development strategy that is in alignment with the current and future needs of Indigenous businesses within their region.

As further services within community are transitioned to local Indigenous businesses as per the Indigenous Procurement Policy and the Indigenous Grants Policy this should happen organically and without the need for further incentivisation. Remote employment services providers will be supporting the establishment and growth of Indigenous businesses by meeting the labour market demands of their region through the services they are already contracted to deliver.

IMPLEMENTATION AND TRANSITION ARRANGEMENTS

Q: What supports do providers, communities and job seekers need to effectively transition to a new approach?

They key to a successful transition will be that there is sufficient lead in time for providers to gain a comprehensive understanding of the requirements of a new approach and build the required internal capability to deliver it. This lead in time will allow time for the changes to be effectively communicated to participants so that they have an awareness of the changes and how they will impact on the services they can access and the expectation on them regarding participation in the programme. Responsibility for this educative work should not become solely the responsibility of providers, the department should provide clear advice to the sector and participants and support in its communication.

To ensure that the service delivery is optimised for participants Human Centred Design methodology should be applied to the design process, especially in the context of any IT interfaces that participants or local staff will be expected to interact with.

As mentioned previously in the paper long term contracts with a duration of five years have been pivotal to providers making long term investments in infrastructure and strategies which support long term community outcomes. Similar contracting arrangements will be essential in creating an environment in which providers can transition to a new approach with confidence.

Q: How should implementation be staged?

Implementation should be staged region by region as they are willing and able to transition to the new model. An incremental rollout will offer the opportunity to review and refine the program and respond to key learnings before the programme is rolled out nationally.

It is important that the mechanisms to opt in to implementation at both a provider and a community level are clearly defined so that there is a consistent and transparent approach to hoe this is determined and a pathway for those who wish to do so.