Re mote Employment and Participation Discussion Paper – Far West Aboriginal Community Leaders' submission

Wayne Miller, CEO Ceduna Aboriginal Corporation
Robert Larking, CEO Scotdesco Aboriginal Corporation
Desley Culpin, CEO Yalata Anangu Aboriginal Corporation
Corey McLennan, CEO Koonibba Community Aboriginal Corporation
Sharon Yendall, General Manager Maralinga Tjarutja Inc. & Oak Valley (Maralinga) Aboriginal Corporation

We, the Far West Aboriginal Communities Leaders welcome the opportunity to contribute to the review of Community Development Programme (CDP). Approximately 26% of the Aboriginal working age population in our region have CDP mutual obligations.[1] In some of our communities, the numbers are substantially higher, with 80-90% of the Aboriginal working age population participating in CDP. Most of our organisations have run CDP activities as sub-contractors to Complete Personnel (who holds the overall tender in the region). Additionally, many of our organisations ran the Community Development Employment Program (CDEP) for 20+ years.

We have greatly benefited from successfully working together with the Australian Government in pursuing our economic participation goals, and see this as an opportunity to grow our partnership. This submission is reflective of our experience with CDP, as well as, our community members, as participants. We support the principle of mutual obligations, that Australians in receipt of government benefits are responsible in turn for contributing to the community. We want to see individual responsibility and community accountability flourish.

In general, we support the majority of the principles outlined in the Remote Employment and Participation Discussion Paper, with a few reservations. Our submission will address the questions raised in the Discussion Paper, proposing some minor adjustments which would result in improved individual and community outcomes.

Background on region

Ceduna is a regional coastal township, which is the main business centre for the Far West Coast of the Eyre Peninsula. In the 2016 Census, 741 people in the Ceduna LGA identified as Aboriginal, representing 21.7% of the population.[2] There are eight Homeland Communities in the Ceduna area: Betts Corner, Yarilena, Dinahline, Warevilla, Munda Munda Watu Tjina, Koongawa Dundey, Munda & Wanna Mar and Tia Tuckia. The people are Wirangu, Mirning, Kokatha and Pitjantjatjara.

[1] Data as of November 2016. Table 14 Working Age Income Support Payments, Ceduna and Far West South Australia, November 2016, p. 21 and Table 1 Regional Age Profile, Ceduna and Far West South Australia, 2011, p. 7, in 'Ceduna and the Far West South Australia Region: Indigenous Regional Profile', Information and Evaluation Branch, Department of The Prime Minister and Cabinet.

[2] Table G01 Selected Persons Characteristics by Sex, 'Ceduna DC 2016 Census Community Profile', http://www.censusdata.abs.gov.au/census_services/getproduct/census/2016/communityprofile/LGA41010?opendocument

Koonibba is one of the oldest Aboriginal communities in South Australia. It was originally established as a Lutheran Mission in 1901, and transferred to the Aboriginal Lands Trust in 1975. The 2016 Census recorded 149 people residing in Koonibba, of whom 130 were Aboriginal. An internal audit, however, captured closer to 240 people.[3] The total land title holdings consist of 16,000 acres, of which 7,000 is arable. The community consists of Wirangu, Mirning and Kokatha peoples.

Scotdesco is a homeland property, 'Tjilkaba', used for sheep and salt-bush farming, housing and cultural activities such as hunting. It was not captured separately in the 2016 Census, but local records indicate approximately 80 people live in the community. The people are Wirangu, with links to Kokatha and Mirning families and cultures.

Yalata community is on Aboriginal Lands Trust land which is also an Indigenous Protected Area (IPA) on the traditional land of the coastal peoples. The community are the descendants of Pitjantjatjara Anangu desert people, who moved to Yalata Mission following the closure of the Ooldea Mission and were prevented from returning to their country by the atomic testing in the 1950s and 1960s. As a displaced people, the Yalata Anangu has struggled to maintain their cultural connections to their Pitjantjatjara homelands. Many speak a dialect of Pitjantjatjara, with some speaking Yankunytjatjara as a second language. The 2016 Census recorded 248 people living in Yalata, of whom 211 identified as Aboriginal.[4]

Oak Valley Aboriginal community is located on the southern fringe of the Great Victoria Desert and is the only permanent community on the Maralinga Tjarutja land. It was established in 1985 following a time of upheaval during the atomic testing. The population fluctuates significantly on a regular basis. The 2016 Census recorded 59 people living at Oak Valley, of whom 47 are Aboriginal. [5] A local survey conducted on 28 October 2016, however, found the population (excluding visitors) to be significantly higher, at 128, including 116 people of whom identified as Aboriginal.

Streaky Bay is a coastal township, with established agriculture and fishing industries, and a growing tourism industry. The traditional owners are Wirangu, with links to neighbouring Barngarla and Nauo people. The 2016 Census recorded 2,074 people living at Streaky Bay.[6] Rates of unemployment appear to be lower in Streaky Bay, with approximately 80 people engaged in CDP, most of whom are semi-retired. This represents only around 6% of the unemployed in the Far West Region.

Independent studies have been conducted at a local level given concerns about the validity of 2016 Census data, due to community involvement on Census night and the transient nature of communities.

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[3] Table G01 Selected Persons Characteristics by Sex, 'Koonibba 2016 Census Community Profile' http://www.censusdata.abs.gov.au/census_services/getproduct/census/2016/communityprofile/SSC40707?opendocument

[4] Table G01 Selected Persons Characteristics by Sex, 'Yalata 2016 Census Community Profile', http://www.censusdata.abs.gov.au/census_services/getproduct/census/2016/communityprofile/SSC41653?opendocument.

[5] Table G01 Selected Persons Characteristics by Sex, 'Maralinga Tjarutja (AC) 2016 Census Community Profile', http://www.censusdata.abs.gov.au/census_services/getproduct/census/2016/communityprofile/LGA44000?opendocument

[6] 2016 Census Quick Stats, 'Streaky Bay (DC)', http://www.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/LGA47490?opendocumen

Proposed objectives and design principles

The proposed design principles address a significant number of our fundamental concerns with the current state of CDP. While there are other factors to consider, we are particularly pleased to see:

- **The commitment to transition to local service delivery; and increasing the number of Indigenous owned and controlled organisations providing services under CDP.** Remedying issues with current contractual and subcontracting arrangements as of first importance. Given that 83% of CDP participants nationally are of Aboriginal and Torres Strait Islander descent, contractual arrangements need to reflect the needs of all participants, particularly Indigenous Australians.[7] Moreover, without understanding the nuances of the local environment, service delivery is clumsy and expensive.

  We agree that this means, in practice, service delivery should be carried out, where possible, by Aboriginal and Torres Strait Islander providers. These organisations are best placed to know the needs of their local community and to deliver services in a culturally appropriate way. Culturally aware and accountable local decision making is the most effective way to deliver CDP. It would result in increased participation, with activities which community members want to engage in, as well as improved compliance, using local knowledge to determine the validity of non-participation reasons. This change will improve individual participation outcomes, increase accountability, and ensure more effective government expenditure.

- **A move to engage the local community with local control and decision making.** We believe that CDP can play an important role in community empowerment and economic development, and that increasing community decision making will in turn improve program outcomes. Increased local control would help to ensure choosing meaningful activities which would in turn motivate participants to work. We suggest that reintroducing Community Action Plans, which functioned under the previous CDEP, would be a suitable mechanism to achieve this design principle.

- **Reinvesting any efficiencies back into communities, for example through 'top up' arrangements for job seekers; and a wage-based or 'wage-like' model providing weekly payments to job seekers.** We welcome both of these design principles. We believe this would be a more effective means of promoting active participation, as participants could see the direct link between their work and their payment. A 'top up' scheme would stimulate the local economy and encourage participation. We understand this would need to be limited to ensure employers did not use participants to avoid fully meeting their own funding responsibilities.

- **Establishing better arrangements for job training and a pathway to real employment.** We support an improvement to the current training arrangement, which are currently delivered in an adhoc manner and sometimes funded by the communities themselves. We believe this design principle could be achieved through a more planned and structured approach, with Annual Training Plans and an associated budget for each region. This would ensure that training requirements are met, adjusting with changes in the job market, and leading to real employment.

[7] 'The Community Development Program (CDP)', Department of Prime Minister and Cabinet, https://www.pmc.gov.au/indigenous-affairs/employment/community-development-programme-cdp

- **Encouraging business to hire and invest in local people; and delivering subsidised labour for contracting opportunities, while not crowding out existing investments and jobs.** We support this idea, and believe it could be an element in some individuals' pathway to employment. Reintroducing this scheme would bring advantages to both individual job seekers as well as to local businesses.

New wage-based model

We are broadly supportive of the new wage-based model, noting that some of the details of how it will work are yet to be made clear. It seems that this would be the most suitable model to improve individual participation and employment outcomes, while also strengthening remote communities. It appears that this model addresses a number of the problems underpinning the current version of CDP. We applaud the Aboriginal Peak Organisations of the Northern Territory for their innovative work in designing the three-tier model, and support the Government's consultative modelling.

In terms of specific questions arising from the Discussion Paper:

- A 'three tiered' approach, if delivered appropriately, will ensure that job seekers are receiving services according to their individual circumstances and capacity. We welcome this, as we see its potential to help improve the employment outcomes of our people who are job ready, while reducing penalties for those who have significant barriers. We also welcome the new opportunities involved, particularly in Tier 3, which we see as having transformational potential.

  We support moving elements outside the national income and compliance system, assuming that suitable safeguards were put in place. We see the advantages of administering CDP as a wages-based model paid by providers, with the option for top-ups, rather than a welfare model paid by the Department of Human Services. A wages model allows participants to see the direct correlation between their work and their pay, thus promoting active participation. A wages model would also enable a more effective compliance system, through a Show Pay system where people are paid for the hours that they work. As such, we would be supportive of moving Tier 2 and Tier 3 out of the income and compliance system and into management by providers. We agree that this would achieve better outcomes for job seekers as well as for communities.

  Our region is part of the Cashless Debit Card trial. We believe it would be appropriate that those who remain in Tier 1 would continue to be subject to the conditions of Cashless Debit Card, and those who move into Tier 2 and 3 would have independent responsibility. This would provide an incentive to move into a higher Tier as an individual's barriers were addressed.

- We believe the maximum activity requirements for all tiers should be no more than 30 hours per fortnight. This is appropriate and fair, taking into consideration the mainstream activity requirements of jobactive as well as the minimum award wages. While the current proposal to reduce activity requirements to 20 hours per week is an improvement on the current situation, it is still too high.

  There is a significant difference between CDP and its metropolitan equivalent jobactive, as well as other Australians who are paid award wages as a fundamental right. Under CDP, participants have an immediate Work for the Dole activity requirement. By contrast, the

annual activity requirement in jobactive generally is only for six months, and only after receiving an income support payment for one year.

Although the number of hours varies according to age and work capacity, it is almost uniformly higher for CDP participants.[8] For example, CDP participants aged 18-49 with a full-time work capacity are required to do 25 hours per week for 46 weeks of the year (a total of 1150 hours per year). Jobactive participants under 30, however, are only required to do 25 hours per week for 26 weeks a year (a total of 650 hours per year) while those aged 30-59 are required to do even less, at 15 hours per week for 26 weeks a year (a total of 390 hours per year).[9]

It is not equitable to have such a marked difference between metropolitan and remote participation requirements. Indeed, considering that 83% of CDP participants are Aboriginal and Torres Strait Islander, we contend the current policy unfairly targets Aboriginal people.

We would like to see CDP activity requirements become more in line with those of jobactive. Depending on personal circumstances, CDP equates to approximately $11 per hour, well below the national minimum wage of $17.70 per hour.[10] Given that CDP is, by its nature, a work activity, it is not appropriate or fair to expect our community members to work for significantly less than the minimum wage, particularly when this expectation does not extend to metropolitan Australians. Activity requirements based on the national minimum wage would be approximately 30 hours per fortnight, which is commensurate with most jobactive requirements.[11] As such, we are pleased to see that the Government is reviewing what is reasonable in terms of CDP activity requirements, and urge a consideration of no more than 30 hours per fortnight.

We do, however, strongly support the reintroduction of top-up payments for those in Tiers 2 and 3 to create additional incentives for participation. Top-ups allow for missed work to be completed, for individuals to be encouraged in their pathway to employment, and for the regional economy to be stimulated. Through keeping the maximum activity requirements at no more than 20 hours per week, a top-up scheme would be a positive component of the new CDP scheme.

[8] The one exception is early school leavers under 22 years of age, who have equal requirements across both jobactive and CDP.

[9] For further discussion, refer to Dr Kirrily Jordan, 2017, 'Submission to Senate Standing Committees on Finance and Public Administration: Inquiry into the appropriateness and effectiveness of the objectives, design, implementation and evaluation of Community Development Program (CDP)', http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Finance_and_Public_Administration/CDP/Submissions, submission no 30.

[10] Human Rights Law Centre, 2017, 'Submission: A fair and community-led approach to remote community and economic development: Inquiry into the Community Development Program (CDP) by the Senate Standing Committees on Finance and Public Administration', http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Finance_and_Public_Administration/CDP/Submissions, submission no 39.

[11] Based on Newstart Allowance for single, no children at $538.80 per fortnight. Department of Human Services, 'Newstart Allowance: How much you can get', https://www.humanservices.gov.au/individuals/services/centrelink/newstart-allowance/how-much-you-can-get, last updated 24 November 2017.

In a similar vein, we agree that increasing flexibility in when activity requirements can be met would promote increased participation. Working a set number of hours per day, every day, allows very little scope for compromise and does not consider the individual circumstances of participants. Allowing activities to be measured in hours per fortnight (or per week) increases the service delivery capability of provider organisations. For example, some of our organisations have found it difficult to find a competent supervisor who is willing to only work five hours per day instead of full-time. It also reduces barriers to participants taking paid part-time top-up work, which is difficult when they have to do CDP activities for a set number of hours per day. Introducing more flexibility will promote a higher rate of participation.

- We support the introduction of subsidised jobs, which we believe should be available to all job seekers in remote Australia. We see the potential of linking this with the highly successful Working on Country program, which is already recognised as 'one of Australia's most successful Indigenous programs' as it 'combines meaningful employment and training with cultural priorities to work on and manage country.'[12]

  We would like to see a trialled expansion of the Working on Country program wherein the current cost per head of CDP for a portion of participants is reinvested into additional ranger positions. We already have a successful Working on Country program at Yalata, which could easily be expanded, and we would be eager to see it flourish in our other communities. Naturally, given the nature of this program, it would be restricted to Indigenous job seekers only. By choosing to reallocate a portion of the current CDP expenditure to create real, culturally appropriate jobs, the Government would be minimising unemployment while supporting Aboriginal and Torres Strait Islander obligations to care for country.

- We are supportive of the Show Pay arrangement for those in Tier 2, with payments based on hours of attendance. At the moment, it can take weeks or months before a penalty is applied, by which time the 'non-compliance' event has long been forgotten. Instead of reinforcing that participation leads to payment, it feels unpredictable and confusing. More immediate penalties, with a simple to understand No Work No Pay policy, will significantly help improve participation.

  We also see the advantages of a Show Pay system in incentivising part-time work. At the same time, to effectively incentivise part-time work, a more generous income test taper would need to be simultaneously applied. The current income test, which varies depending on participant circumstances, is too restrictive. Introducing a more generous income test, while also adopting the Show Pay system, can encourage part-time work.

  A Show Pay system should be accompanied by providers being the authority to determine the validity of exemption reasons. Naturally, there are circumstances where it is appropriate for individuals to be granted an exemption from their activity requirements. This could be for traditional cultural activities, for short-term illness, or for caring responsibilities, among other scenarios. In these situations, no penalties should be applied. We are aware, however, that some participants in our communities provide invalid excuses and still have their penalty

[12] Central Land Council, 2017, 'Submission to the Senate Finance and Public Administration Committee: Inquiry into the appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program (CDP)', http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Finance_and_Public_Administration/CDP/Submissions, submission no 35.

waived. This compounds the problem, as their peers see them using invalid excuses and receiving payment, which in turn discourages their own participation.

We believe local Indigenous providers are best placed to assess the validity of the reasons given. They have an intimate knowledge of local circumstances, as well as the local partnerships to find out more information if required. Reinvesting trust in local Indigenous providers to determine the validity of non-participation is the best compliance method. While there should still be rights of appeal, the process should be streamlined and centre on local Indigenous providers.

Furthermore, in some circumstances, financial penalties are not the most appropriate method for ensuring compliance and encouraging participation. Under CDEP, the No Work No Pay policy was managed by the community, which gave them ownership and control on the ground. Now, providers have little scope for other compliance methods. Providers should be able to access a range of measures, with financial penalties being just one, to encourage participation.

CDP2

We do not believe that moving to CDP2 would be the most effective model. We do not believe that the CDP2 legislation addressed many of the fundamental problems with the current program, including:

- Not recognising the importance of Aboriginal and Torres Strait Islander service providers.
- Not addressing the excessively high activity requirements and lack of flexibility in how those activity requirements are carried out.
- Not engaging the local communities appropriately or planning for tailored and relevant funded training.
- Not allowing for individual placements with mainstream businesses as an option for activity requirements
- Not considering anything which combines participation with cultural responsibilities, such as an expansion of the Working on Country program
- Not incentivising work through balancing the income test and activity test – although it introduced a more generous income test, it restricted the activity test, and in the end, had a net disincentive effect on part-time work
- Not considering means other than penalties for providers to manage non-participation
- Not providing the option for top-up payments for additional work performed by participants
- Not funding workers' compensation and superannuation.

The two elements of CDP2 which we see as beneficial, but also which exist in the new wage-based model, are:

- Introducing an immediate No Show No Pay policy to promote work-like behaviours
- Weekly payments made by providers rather than fortnightly payments made by the Department of Human Services.

Current CDP with improvements

The current CDP model needs significant transformation, not small-scale improvements. We see the need for change in ten key areas, and would be happy to expand upon our recommendations:

Recommendation 1: Where possible, award contracts to suitable Aboriginal and Torres Strait Islander community organisations that are best placed to deliver services to all participants, ensuring effective participation and compliance in a culturally aware manner. Indigenous community-controlled organisations are more likely to reinvest the profits back into their communities, enhancing the overall effectiveness of government expenditure. Introduce guidelines and controls to ensure appropriate and equitable subcontracting arrangements.

Recommendation 2: Align activity requirements with those of jobactive and in consideration of minimum award wages, change the requirements to no more than 30 hours per fortnight. Allow for flexibility in how participants can meet their required activity hours each week, rather than using a set hours per day formula.

Recommendation 3: Plan for appropriate and meaningful activities through Community Action Plans, and tailored and relevant funded training through regional Annual Training Plans.

Recommendation 4: Allow for individual placements with mainstream businesses as an option for activity requirements.

Recommendation 5: Trial an expansion of the Working on Country program by reinvesting the current cost per head of CDP for a portion of participants into additional ranger positions.

Recommendation 6: Incentivise work by introducing a more generous income test taper, while ensuring that paid part-time work counts towards the activity test requirement.

Recommendation 7: Introduce a No Work No Pay policy with more immediate effect to encourage participation and increase compliance. Invest authority in local Indigenous providers to determine validity of exemption reasons.

Recommendation 8: Enable providers to use penalties to manage non-participation in a locally appropriate and accountable way.

Recommendation 9: Administer payments as a wages model paid by providers, with the option for top-ups, rather than a welfare model paid by DHS.

Recommendation 10: Fund workers' compensation and superannuation as minimum requirements for CDP participants.

The recommendations for improvement, including the reduced participation hours, expanded definition of activities, and reviewed provider payment model, will go some way to improve the current CDP administration. Yet these alone will not go far enough. We encourage the government to consider our ten recommendations, if staying with the current CDP model.

- We see some advantages of remaining with elements of the national income and support system. Even with the new waged-based model, which we prefer, participants in Tier 1 would remain with Centrelink. In our region, this would mean, as discussed earlier in our submission, that they would also remain on the Cashless Debit Card while those who moved into Tier 2 and 3 would have the right to control their own money.

  We would also like the Department of Human Services to continue to conduct Job Capacity Assessments which will be used to stream participants based on their capacity to work. These should be conducted in consultation and close coordination with the local communities, who can provide culturally relevant information which might not otherwise be evident.

- We currently have a good relationship with our local Department of Human Services Service Centre staff. We appreciate their out-servicing to our communities, and find this an effective way of getting business done.

- We are not satisfied, however, with the current arrangement for contacting the Department of Human Services over the phone. Community members frequently experience wait times of five to six hours before they can speak to someone who can resolve their problem. This is not good enough. In communities where there is telecommunication infrastructure, one person waiting on the phone for five to six hours affects the rest of the community. We believe that wait times need to be significantly reduced, and would suggest a dedicated and appropriately resourced phone queue be established to facilitate this.

- We would like to see improvements to current online reporting functionality, which would help streamline interactions with the Department of Human Services. We believe it is important to look at different ways to improve the back-end systems to improve the user interactions. We would like to see online reporting become simpler and more user-friendly, with key problems identified through useability testing with Aboriginal Australians in remote areas. Once the system was more user-friendly, there could also be more scope to move additional functionality online, to further streamline interactions.

  In our communities, however, there is a key blocker to the use of current online services. Koonibba and Scotdesco have both been set up as an Access Point rather than an Agent. This means that there are no self-service terminals, and community members who come in to use the services only have access to a phone. We believe that Access Points should be able to opt-in for a self-service terminal, so that participants can use online services to report. Additionally, while Oak Valley is an Agent and has a self-service terminal, very slow internet speeds in the area are not compatible with the use of online services, causing participant frustration. While the installation of the NBN will partially resolve this problem, we recommend that the Department of Human Services explores a version of online services suitable for remote areas where there is less internet connectivity. We also recommend a whole-of-government approach to ensuring that the NBN is rolled out in a timely manner. Improved access to self-service will reduce the pressure on the phone service, and be a more efficient outcome for both the Department of Human Services and for participants alike.

- If a wage-based model is implemented, this will require management at a local level, including ongoing interactions with the Department of Human Services. We would want the relationship with the Department of Human Services, and its performance, to be continually reviewed, as part of striving for high quality program outcomes. In particular, we want to continue our local level interactions, with improved online support for faster reporting.

Proposed options for a future model

Noting that not all details have been confirmed, it seems that Option 1, the new wage-based model, would best meet the needs of remote communities. It has the potential to promote active participation, community empowerment, streamlined and efficient administration, and real pathways to employment. We have outlined some ways in which the current proposal needs improvement, such as through further reducing the activity requirement, and integrating Tier 3 with a trialled expansion of the Working on Country Program. We also retain some reservations, not knowing exactly what the legislation will entail, and what program rules will look like. Overall, however, we are enthusiastic about the prospect of a renewed CDP which could transform participation and employment in our communities.

In addition to what we have already raised, we would also like to see the introduction of workers' compensation and superannuation. It is not equitable that CDP participants are not covered by what is a minimum requirement for other Australian workers. Introducing superannuation would be an investment for the future, reducing later Government outlay for Age Pension. Similarly, workers' compensation schemes could reduce Government expenditure for Disability Support Pension, as well as minimise lost productivity. Ensuring CDP participants are covered by Work Health and Safety requirements would improve work-readiness, as their individual responsibilities would be transferrable to mainstream work. Workers' compensation and superannuation are minimum work entitlements, and should be included as part of the CDP funding.

We believe that, whatever model is chosen, it must be underpinned by a greater connection to the community. This will include awarding contracts, wherever possible, to Aboriginal and Torres Strait Islander providers, to increasing local autonomy in designing activities and a local empowerment for better compliance. This will improve individual participation outcomes, ensure program outlays are spent more efficiently, and increase community cohesion in remote areas.

Given the unique environment of remote communities, we believe that the Government does play a role in job creation. It is for this reason that we see our proposal for a trialled expansion of Working on Country as an innovative way of maximising government expenditure within the context of Indigenous cultural responsibilities to care for country. At the same time, we want to see the broader local economy grow, and believe that placements with local businesses can be a mutually beneficial solution for both the small business and the job-seeker. We also long to see more Indigenous enterprises flourish, and would be supportive of mechanisms which would encourage this. There is a need for ongoing training and support, such as a section carved out each year in the Annual Training Plan for the region. A suitably resourced skills-based mentorship program for those interested in setting up their own business could also be explored.

Implementation and transition arrangements

Across Australia, and even within CDP regions, each community is different and requires a different approach to successfully implement a new CDP model. Nevertheless, a few key principles would apply to successful implementation. We have learnt these lessons from the implementation of the Cashless Debit Card, the success of which was underpinned by the regional Leaders' Group working together with each other and with the Government to support a successful program delivery.

- Ensure adequate timeframes are provided for sufficient discussions and negotiations with each community. Rushing the implementation would lead to confused and disengaged participants, poorly designed operating principles for service providers, and ultimately waste government funds.

- Within each region, develop an implementation schedule in consultation with the different communities. Roll out to small groups of people first, whether this be subsets of small communities first or family groups first. The Cashless Debit Card was rolled out to an extra 5-20 people each day. Through a gradual and phased implementation in each region, any problems can be ironed out much more efficiently than if it everyone transitioned at the same time.

- Coordinate the approach between key stakeholders, namely the Department of Prime Minister and Cabinet, the Department of Human Services, and the Service Provider for each region. Ensure all stakeholders are at the same table at the same time, to maximise shared-decision making, efficient communications and trust.

- Ensure that the roles of each stakeholder remain clear and understood by their counterparts. For example, the Department of Prime Minister and Cabinet provides funding, policy development and regulatory control. The Department of Human Services administers payments to those in Tier 1 (including by the Cashless Debit Card, where relevant), conducts Job Capacity Assessments, and provides case management and financial counselling as required. Service Providers develop job plans, monitor participation, administer wages including top ups, and deliver compliance schemes.

- Ensure that participants understand the changes. Run information sessions, led by a trusted and informed community member, to highlight what has changed and what participant obligations are. This will ensure that participants comply with their new requirements, and maximise their active participation in the program.

Interim trial option – variation to existing contract

Our experience with the Cashless Debit Card Trial has taught us that clear stakeholder relationships and a phased implementation are essential to the successful delivery of a new program in a remote community. We would recommend the same lessons learnt are applied to CDP and ask that consideration be given to trialling elements of the above recommendations that do not require legislative change via a variation to the governments existing CDP provider contract. This would allow us to road test elements of the above recommendations and provide the government with an evidence base on which to seek further support.

Conclusion

We commend the Government's desire to ensure CDP is the most effective program possible to help move participants from welfare into work. We would be happy to discuss these recommendations further with the Government, including through the targeted community consultations or expert working group. We would also be happy to work together in piloting a new model of CDP. We have appreciated the strong relationships and open dialogue built between the Government and our Leadership Group, and hope that this can continue through the review of CDP.