



Brotherhood
of St Laurence

Working for an Australia free of poverty

A new voluntary parent support service

Submission to the Department of
Employment and Workplace Relations

Brotherhood of St. Laurence

September 2023

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Summary

Brotherhood of St. Laurence (BSL) has a long history of helping to build better pathways to economic and social participation through our service delivery, policy work and research. Drawing on our experience as a past provider of ParentsNext and our research on women's economic security, BSL is currently piloting an innovative, voluntary service called Sustaining Economic Empowerment and Dignity for women (SEED), in Seymour, Victoria. A well-designed voluntary parent support service will advance efforts to build the economic security of low-income parents, especially mothers. We welcome the opportunity to contribute to the design process and would welcome further discussion with the Department about our learnings from SEED.

We understand that the Department of Employment and Workplace Relations (the Department) has been consulting with parents on the design of the service. It is crucial that the themes from these consultations are directly reflected in the final service model.

BSL strongly welcomes the decision that the program will be voluntary as this is essential to supporting the dignity and autonomy of parents and providing effective support. We believe the service description and principles articulated in the [consultation guide](#) are consistent with evidence of best practice and improving economic security and BSL recommends that these form the basis of the final objectives and principles for the new service.

As we emphasise throughout our submission, it is important that the commissioning process is designed from the outset to support a diversity of not-for-profit providers and to enable and encourage flexibility and collaboration. This needs to be supported by robust performance assessment to ensure accountability.

Additionally, BSL recommends that:

- the principles and objectives of the service be included in the program deed and incorporated into performance assessment for providers
- providers be required to implement mechanisms for the voice of participating parents to continually be heard and to inform service delivery
- the new service provide support to low-income parents, does not restrict eligibility to parents receiving Parenting Payment or social security payments, and is accessible to parents with children older than six years of age where capacity allows
- the service provides long-term support to parents and continues to assist them regardless of their obligations to engage in Workforce Australia
- the Department commissions and funds providers in select locations to facilitate Community Investment Committees to drive local solutions to complex challenges faced by parents in place
- performance assessment includes the ongoing professional development and upskilling of staff
- a Community of Practice model be included in the design of the new program

- providers are block funded and funding is regularly indexed and inclusive of all costs, with contract terms of at least five years
- outcome payments do not continue in the new service, and funds currently allocated to outcome payments be reinvested in the Participation Fund
- continuation of a pooled Participation Fund that can be used flexibly and without onerous administration by providers to address barriers to future secure employment.

Our most recent [submission](#) on ParentsNext to the Inquiry into Workforce Australia Employment Services outlined our proposed approach to the design of a replacement service. In this submission, we build on rather than repeat the points raised earlier and we strongly encourage the Department to [refer to that submission](#) throughout the design phase.

The Brotherhood of St. Laurence and pre-employment support for parents

The Brotherhood of St. Laurence (BSL) is a social justice organisation working alongside people experiencing disadvantage to prevent and alleviate poverty across Australia. Our mission is to pursue lasting change, to create a more compassionate and just society where everyone can thrive. Our approach is informed directly by people experiencing disadvantage and uses evidence drawn from our own and others' research, together with insights from our programs and services, to develop practical solutions that work.

BSL delivered ParentsNext in the pilot phase (2016–2018) and in the national rollout of the program (2018–2021). We then withdrew from service provision due to concerns about the compulsory and punitive nature of the program—the Targeted Compliance Framework in particular. Our most recent [submission](#) on ParentsNext to the Inquiry into Workforce Australia Employment Services outlined our proposed approach to the design of a voluntary replacement service. This submission will build on rather than repeat the points made earlier, and we encourage the Department of Employment and Workplace Relations (the Department) to refer to that submission throughout the design phase.

Objectives and principles

Our previous submission recommended that improving long-term economic security of low-income parents be adopted as a core objective of the program and we are pleased that the early design ideas are aligned with this objective. We strongly welcome the decision that the program will be voluntary as this is essential to supporting the dignity and autonomy of parents and providing effective support.

BSL supports the service description included in the *Consultation guide for providers* which states that the service will support parents to:

- plan for their future education and employment goals
- build their capabilities and skills
- work toward the type of paid work they want, when they're ready.¹

The *Consultation guide for providers* also outlines principles to guide the consultation for the new service, which include:

- targeted services which respond to individual needs, build confidence, combat isolation, and support aspirations
- valuing unpaid care (caring for and raising children) as legitimate, important work

¹ Department of Employment and Workplace Relations 2023, *Consultation guide for providers*, <<https://www.dewr.gov.au/consultation-new-voluntary-parent-support-service/resources/consultation-guide-providers>>, p. 1.

- a focus on participants' strengths, on addressing barriers to social and economic participation, and on achieving long term financial security
- a focus on job quality and security, as well as intersections between employment and social security, where a participant has employment as a goal.²

The service description and principles articulated in the consultation guide are consistent with evidence of best practice and improving economic security and BSL recommends that these form the basis of the final objectives and principles for the new service. These would assist with communicating clearly to parents about the intent of the service and in building trust. To further aid trust and build transparency and accountability into the service, **BSL recommends that the principles and objectives of the service be included in the program deed and incorporated into performance assessment for providers.**

Commissioning

We note that issues relating to commissioning have not been outlined in the consultation guide, however, we feel this is a critical area for consideration.

The view expressed in our previous submission was that one provider should be funded per region, like Transition to Work. We acknowledge there may be benefits to having a small number of providers in some areas, to allow opportunity for specialisation and continuation of support, if the relationship between a provider and participant irretrievably breaks down. For this to be effective, it is important that the commissioning process is designed from the outset to support a diversity of providers and to enable and encourage collaboration, not competition.

Not-for-profit providers that can demonstrate strong local connections to community should be selected to deliver the service, as these organisations exist to benefit the community and improve wellbeing. For-profit providers have competing motivations,³ and we strongly discourage their eligibility to apply to deliver the new service. As a participant in a lived experience community consultation on Workforce Australia facilitated by BSL put it: 'this should be a service for the public good, not private profit'.

Where contracts, client shares and payments are allocated on a competitive basis, providers are actively discouraged from sharing any expertise or knowledge they acquire. This is not conducive to driving the continuous improvements necessary to achieve the best outcomes for parents. Providers must be commissioned, and contracts and funding designed, to foster collaboration rather than competition, supported by mechanisms like a Community of Practice for sharing learnings (see below for more information).

Throughout this submission, we argue in support of contracting and funding arrangements that support certainty and flexibility for providers. To ensure transparency and accountability to government and participating parents, robust performance assessment will be required to assess

² Department of Employment and Workplace Relations 2023, p. 3.

³ Considine, M, McGann, M & O'Sullivan, S 2021, *Buying and selling the poor: inside Australia's privatised welfare-to-work market*, Sydney University Press, Sydney.

whether the service is meeting identified needs and being delivered in alignment with the principles and objectives of the program.

Responses to consultation topics

Parents' needs

How can the new service ensure that caring for children remains a priority for parents?

Voluntary engagement is the primary mechanism by which the service can ensure that the value and primary importance of care for children is upheld. This enables parental agency in judgements relating to the balance between care and pursuing other goals that will support the long-term interests of the family. It is essential that the program is flexible enough for parents to engage, disengage and re-engage as they see fit, and as their needs and those of their children shift and change. Providers will need to deliver the services at times, locations and in modes that support and allow for caring responsibilities.

Support provided to parents directly affects children, and their best interests must remain a primary consideration in the design and delivery of the service. While supporting parents, the realities of care and the social and emotional wellbeing of children will need to be front-of-mind for providers. Performance assessment must consider the ways in which providers can demonstrate this. For example, providers could join relevant networks and establish close connections or even co-locate with child-focused services such as Maternal Child Health, schools and family services to enable and support warm referrals where this aligns with parent's goals, and to help to ensure that the service offering is not creating barriers to parental engagement in child-focused services. Service delivery locations must be welcoming, safe, convenient and suitable for children.

Equally, parents must be supported in a way that enables them to provide the best possible care for their children. This includes connecting them with appropriate services focused on addressing challenges relating to stress, mental health, housing and adequacy of income. The Department and providers must also recognise that where families do not have adequate income to meet their needs, a parent's focus will remain on the immediate material needs of their family, and their capacity to focus on longer-term goals such as education and employment will be greatly diminished. The new service should consider ways to alleviate the immediate financial hardships facing families.

How can the new service best meet the needs of parents and their children?

The needs of parents and their children can best be met by co-designing the service with parents and ensuring it remains flexible and responsive to their needs over time. We understand that the Department has been consulting with parents on the design of the service. It is crucial that the themes from these consultations are directly reflected in the final service model.

Importantly, performance assessment needs to examine how providers include the voice of participating parents in service delivery, for example, through mechanisms such as parent

advisory groups. **BSL recommends that providers be required to implement mechanisms for the voice of participating parents to continually be heard and to inform service delivery.**

To remain suitable and relevant over time, the Department and providers will need to regularly check in with parents about whether the offering is seen as valuable and to plan together to make improvements. This can be achieved through inclusion of quality indicators as part of performance assessment, as well as investment in longer term evaluation capacity and capability.

Eligibility

Who would benefit most from a voluntary pre-employment service?

Tell us why.

We note that the consultation guides specify that the program will be for parents receiving Parenting Payment, however our position is that eligibility should not be limited to these parents and instead be extended to a broader population.

Ideally, the service would support any parent with a low income seeking to enter or re-enter the workforce or seeking more financially secure employment. This is because parents face particular challenges in the labour market due to the need to balance work and care, and parents on a low income are the most likely to benefit from support to improve their long-term economic security. These challenges are not limited to those receiving Parenting Payment, or other social security payments.

Further, while some progress has been made, employment does not guarantee economic security, with high rates of low-paid, casualised and part-time work for mothers of young children at times exacerbating insecurity and time poverty. Because of this, the program should not be limited to parents who are not working. There are parents engaged in insecure or unsuitable work who want to take steps towards more sustainable employment that will support their long-term economic security.

We are concerned that targeting parents on Parenting Payment is stigmatising and feeds into erroneous narratives of welfare dependency. If the Department chooses to proceed with restricting eligibility to those receiving Parenting Payment, a clear articulation for why this decision has been made should be provided.

BSL notes the Department's stated intention that the program be limited to parents with children under the age of six. We believe this threshold is too low as parents are more likely to be ready to take steps towards employment after their children have started school and child care challenges become less acute.

The program had 99,215 participants at 31 October 2022, reducing to 93,165 participants at 30 June 2023.⁴ Assuming that the funding for the program remains the same, there will be space for

⁴ Department of Employment and Workplace Relations 2023, Workforce Australia and ParentsNext Caseload Time Series – October 2022 to July 2023, 14 April 2023, <<https://www.dewr.gov.au/employment-services-data/resources/workforce-australia-and-parentsnex-caseload-time-series-october-2022-july-2023>>.

a broader cohort of people to benefit as those who do not wish to participate disengage (at present, it could be assumed there is capacity for at least 6000 additional people to receive support). Further, now that the compliance element has been removed, frontline staff will have more time available to provide support and parents will be more likely to move in and out of the service as they need. Providers could be empowered to flexibly manage caseloads according to their capacity and consistent with the intent and objectives of the program to provide maximum benefit.

BSL recommends that the new service:

- **provides support to low-income parents and does not restrict eligibility to parents receiving Parenting Payment or social security payments, and**
- **is accessible to parents with children older than six years of age where capacity allows.**

Apart from parents who receive Parenting Payment, who might benefit from this service?

Anyone without secure work who has a role in caring for and parenting children could benefit from this service. This includes foster and kinship carers, people receiving other social security payments and as previously mentioned, parents on low incomes who are not connected to the social security system.

Women and single parents, most of whom are women, are more likely to access and benefit from the service due to the continuing impacts of gender inequality and the additional challenges and costs of solo parenting.

What support services should we consider for young parents who left school before completing high school? Do they need a more specialised service? If so, what do they need, and how should it be delivered?

While the service should be able to cater to a wide range of different needs, there is a strong case for a more specialised service for young people, such as the [SEPT program](#) already being delivered by Brave Foundation and demonstrating [successful outcomes](#). Support for young parents aged 18 to 25 should not be limited to those who have not completed high school.

Many young people express a preference for youth-specific services and benefit from practice approaches such as [Advantaged Thinking](#) that focus on investing in their potential. Young parents are in a phase of the life course requiring support to navigate the transition from school and into adulthood and to explore what they wish to be and do alongside their parenting role. However, it is crucial that this support is and remains **voluntary**. Given there are already a range of supports available specifically tailored to this life stage it makes sense to offer a specialised service with greater capacity to understand and connect with existing infrastructure for young people and to provide tailored advice for young parents who are just starting their career journey and may not have worked before.

Timing

When do you think the opportunity to participate in voluntary pre-employment support should be offered to parents?

As previously mentioned, parents should be empowered to decide when they are ready to engage, and services should be prepared to support them at that time. Parents are best placed to decide if their children are at an age or developmental stage at which it is appropriate for them to participate. The program should be offered to the population it is intended to serve through regular and broad promotion using a wide variety of avenues.

How could we tailor the new service to the differing needs and levels of support for parents? What types of needs might require assistance for a longer duration and for how long?

For many parents 'light touch' support, such as engagement in a confidence-building workshop, may be sufficient, whereas parents facing a wider range of barriers or more significant challenges may need more intensive and sustained support. There is no simple way to determine the level and duration of support that may be required. We do not recommend formal streams, as these add unnecessary administrative load and limit a provider's ability to respond to parents' changing needs. Providers need the flexibility to tailor the intensity and duration of assistance on an individual basis in partnership with parents.

How long should support be available to parents for?

As noted in our previous submission, longer term support is required to enable parents to build sound foundations for secure work in the future. In keeping with the intent of the service to build long-term economic security, support should be available to parents for as long as they need it. Due to the complexity of people's lives and the barriers they face, their pathways are likely to be fluid and involve many steps in their journey that take time to complete. Ending support when their youngest child turns six does not make sense in this context.

The interaction between this service and the Workforce Australia system is a critical area for consideration, and difficult to comment on before the Inquiry into Workforce Australia Employment Services concludes, and the government announces any changes to the current approach. However, while we understand that at present parents receiving Parenting Payment (partnered and single) are required to participate in Workforce Australia once their youngest child turns six, the system as it stands is not capable of providing the quality support that parents need, and therefore withdrawing support will be counterproductive. Uninterrupted service delivery is highly important for people working on long-term goals. **BSL recommends that the service provides long-term support to parents and continues to assist them regardless of their obligations to engage in Workforce Australia.**

Features

What support should be offered to parents as part of the new voluntary pre-employment service?

The objectives outlined earlier are adequate to guide support the program can provide without being overly prescriptive. It is important that the program is flexible enough in its funding and contract arrangements to enable adaptation of the service model to local conditions and population characteristics and in response to parent feedback.

Initial engagement with parents should involve a person-centred intake process in which areas of need are determined and parents are supported to explore their aspirations and goals. This would inform the development of a pathways plan, with reviews at regular intervals to discuss progress and make adjustments. It is important that outcomes measurement for the new service is flexible and based on the setting of, progress towards and achievement of individual goals rather than prescribed outcomes like employment.

Our Sustaining Economic Empowerment and Dignity for women (SEED) project in Seymour, while broader than the proposed model, has been successfully delivering this approach and has designed an accompanying method to measure progress across holistic domains that align with an individual's goals. We would welcome further discussion with the Department about the learnings from SEED and how these could inform the design of the new service.

Please see p. 11 of our [previous submission](#) for a list of supports that we recommend the service should offer.

Support around relationships, family violence and parenting require specialist skills and need to be provided via referral to specialist services. Providers must be adequately resourced and encouraged to engage in networks and partnerships outside the education, training and employment sectors.

How do we ensure that parents are supported into secure work?

Pathways toward decent, secure employment can take various forms, depending on the individual parent's needs, circumstances and aspirations. A short-term employment outcome—for example, a casual job that provides relevant work experience and flexibility while juggling study and/or unpaid care—might be suitable provided it is supporting movement towards a longer-term goal or aspiration. It is important that the service assists parents to set goals and plan out their pathway so that the steps taken along the way are meaningful.

It would be useful for providers to be guided by a working definition of secure work to inform their guidance and advice. BSL's working definition of quality work incorporates the following elements:

- pays a fair wage, which is sufficient to meet needs
- is safe
- provides adequate training and support

- enables work/life balance
- is suited to the individual's skills and abilities
- enables long-term economic security
- enhances future work and career opportunities, in line with aspirations
- provides an accessible and inclusive work environment
- enables the individual to be valued and respected at work.

Delivery

Should there be different services for parents from different communities or regions?

The opportunities and networks parents need are both enabled and curtailed by the community context in which they live. This includes the local economic conditions, employment and training opportunities, access to services like housing and transport, and parents' social networks. As previously mentioned, providers with deep local connections and awareness of local conditions should be prioritised in the commissioning process to meet the unique needs of communities.

However, there are many communities across Australia facing higher levels of socioeconomic disadvantage, workforce shortages and/or limited work opportunities that would benefit from additional investment in a model designed to address these challenges. The SEED Project, delivered by BSL, is a model that incorporates a range of mechanisms to address barriers to women's financial wellbeing in place, including the establishment of a Community Investment Committee (CIC) in Seymour, Victoria.

Initially a feature of the [National Youth Employment Body](#), a CIC is a local, collaborative mechanism that brings together key local actors and a diverse range of stakeholders from multiple sectors in a community. A CIC creates and strengthens pathways toward meeting an agreed community need. In the context of the new service, a CIC would focus on building local pathways to economic security and employment for parents and addressing local workforce needs. It would bring together employers, community service providers, education and training providers, local council, community leaders and others to collectively tackle locally identified barriers and leverage local systems to create opportunities that could not be achieved in isolation.

A CIC may focus on projects such as building local employer awareness of the workforce challenges facing parents, supporting employers to adapt and design recruitment practices and jobs to be family inclusive, exploring innovative ways to increase the number of local child care places and designing training pathways that meet the needs of parents and industry.

BSL recommends that the Department commissions and funds providers in select locations to facilitate Community Investment Committees to address complex challenges faced by parents in place.

What skills and qualifications should frontline staff have? Which of these might be mandatory requirements?

Staff would ideally have relevant formal qualifications and/or industry experience, complemented by peer mentoring roles, however we do not recommend that qualifications be mandated. **BSL recommends that the performance assessment process include the ongoing professional development and upskilling of staff.** This could include mandatory training around core competencies, such as gender-awareness and intersectionality, family violence, cultural competence, disability and trauma-informed practice. Access to high quality training could be facilitated by the Department and participated in jointly across providers to build further collaboration, connection and sharing of practice. Engaging participants requires a skill set not necessarily present in employment services staff, and providers will need to take this into consideration during recruitment.

How might communities of practice be embedded as a feature of the new service? Do you think this would be valuable?

Based on our experience of developing and facilitating Communities of Practice (COPs), BSL recommends that COPs form part of the new program. COPs provide a mechanism for purposeful collaboration, networking and shared learning between providers to assist with service consistency, delivering best practice and driving continuous improvement. They achieve this by facilitating the exchange of practice-based expertise and situated knowledge that can generate a shared knowledge base, find solutions to recurring problems and enhance the potential for innovation around a shared ambition. COPs could be formed based on geographic location, organisational characteristics or specialisation. As providers will be located across the country, regular meetings will need to be held online, however COPs should endeavour to meet in person at least once per year. The Department will need to resource the independent facilitation of the COPs and coordinate a yearly meeting of all COPs. **BSL recommends that a Communities of Practice model be included in the design of the new program.**

Engagement strategies

How might we encourage parents to participate in the new voluntary pre-employment service? What strategies or assistance would make it easier for parents to participate in a voluntary service?

As we have continually emphasised, if quality support is offered and clear information about the program is communicated, parents who are ready to start preparing for future employment will engage. A solid program offering, so parents can see the benefits of participation, acts as an incentive. Our experience delivering voluntary employment services tells us that what works well is a partnership approach to working with parents—in setting goals and building a pathways plan—that centralises dignity and choice.

If engagement is low, it must not be assumed that the problem lies with parents. The onus should be on government and providers to demonstrate the benefits of the program and to promote it effectively, and to seek opportunities to engage with policy makers to address systemic barriers to work.

Child care is the biggest barrier to workforce participation and also impacts engagement in pre-employment support for parents with young children. The best incentive for these families would be the provision of free child care and support to find places. For example, the Jobs, Education and Training (JET) program (1989-1996) provided:

- Eight years of free child care if parents were studying or training
- Highly subsidised child care for 26 weeks for single parents starting work
- Support from JET child care workers in the Department of Community Services and Health to find and pay for family day care, occasional care and long day care places.

While the service could assist with affordability and finding places, issues around availability will remain. We recognise that this broader issue, which is largely beyond the remit of the design team in the Department, will have a significant impact on the success of the program. The Department will need to prioritise working closely and consistently with other areas of government to progress investment in child care availability and be clear about the constraints that this issue places on the ability of the service to deliver outcomes for parents with very young children. Advocacy to remove the Child Care Activity Test, make additional child care places available where they are needed and address high effective marginal tax rates must progress alongside program delivery.

To engage, parents first need to know that the program exists. The Department will need to support providers by investing in clear and consistent advertising about the service. Simple eligibility criteria and clear communication about who the service is for will also assist with engagement.

Providers need to be able to accept referrals from any source, including self-referrals. Services Australia should remain a primary referrer due to its level of contact with a wide range of people who would benefit from the service. However, another systemic barrier to participation is the under-resourcing of Services Australia, including the decline in the number of social workers, which limits capacity to provide well-informed and well-timed referrals.

Funding

What should be the funding model for providers? For example, fee for service, up-front payments, graduated payments, or outcome payments or a combination of these?

Certainty in the funding model is essential for service planning, continuity and staff retention. Block funding based on an estimated number of participants would provide a level of stability while enabling providers to deliver the service flexibly.

Providers can be supported to deliver the program effectively through long-term contracts of at least five years, with funding that is regularly indexed to keep up with rising costs and inclusive of all relevant delivery costs (such as Portable Long Service Leave in Victoria).

BSL recommends block funding for providers that is regularly indexed and inclusive of all costs, and contract terms of at least five years.

In your experience, what incentives drive providers to achieve the best outcomes? What are your thoughts on outcome payments to providers?

Rather than a focus on incentives, we suggest a focus on commissioning the right providers and implementing a partnership approach to achieving outcomes between government and providers, supported by robust performance assessment. To be commissioned to deliver the service, BSL recommends that the Department require providers to show evidence of a commitment to, and success in achieving, outcomes for the people they serve. When government works in close partnership with providers, rather than adopting a top-down accountability approach, an enabling and positive environment can be fostered that maintains commitment to achieving the best outcomes.

Outcome payments are not a good fit for a pre-employment program focused on longer-term pathways and could create adverse incentives and drive competition for referrals between providers. These payments do not constitute a significant source of income for providers under the current ParentsNext funding model, making up only 1.1% of total program funding.⁵ **BSL recommends that outcome payments not continue in the new service, and that funds currently allocated to outcome payments be reinvested in the Participation Fund.**

How might the Participation Fund be a feature of the new service?

The Participation Fund is a valuable aspect of the service design. There is significant utility in providing funds for education and training, licenses, transport, identification documents and other material resources to assist parents to overcome barriers. **BSL recommends continuation of a pooled participation fund that can be used flexibly and without onerous administration by providers to address barriers to future secure employment.** Consideration should be given to increasing the amount provided per participant, and to allowing the use of the fund for purchases and services with collective benefit (decided in partnership with participating parents) such as a bus to provide community transport to parents.

Thank you for the opportunity to submit. Please do not hesitate to contact us if any further information or clarification would be useful.

⁵ Department of Employment and Workplace Relations 2022, *Submission from the Department of Employment and Workplace Relations to the House of Representatives Select Committee on Workforce Australia Employment Services: ParentsNext*, Submission 77, <https://www.aph.gov.au/Parliamentary_Business/Committees/House/Workforce_Australia_Employment_Services/WorkforceAustralia/Submissions>.