# Welfare Review Submission Template

## Pillar One: Simpler and sustainable income support system

Changes to Australia’s income support system over time have resulted in unintended complexities, inconsistencies and disincentives for some people to work. Achieving a simpler and sustainable income support system should involve a simpler architecture, a fair rate structure, a common approach to adjusting payments, a new approach to support for families with children and young people, effective rent assistance, and rewards for work and targeting assistance to need.

### Simpler architecture

**Page 42 to 52** of the Interim Report considers the need for a simpler architecture for the income support system. The Reference Group proposes four primary payment types and fewer supplements. The primary payment types proposed are: a Disability Support Pension for people with a permanent impairment and no capacity to work; a tiered working age payment for people with some capacity to work now or in the future, including independent young people; a child payment for dependent children and young people; and an age pension for people above the age at which they are generally expected to work.

In shaping the future directions for a simpler architecture the Reference Group would like feedback on:

* What is the preferred architecture of the payment system?
* Should people with a permanent impairment and no capacity to work receive a separate payment from other working age recipients?
* How could supplements be simplified? What should they be?
* What are the incremental steps to a new architecture?

| Thank you for giving Northcott the opportunity to contribute to the current Welfare Review. All of our answers contained within this document are based on our 85-year experience as a disability service provider operating across NSW and the ACT.   * We work with people with disability, their families and carers across the lifespan. * We work with people with all disability types. * Our services include accommodation, vocational & life skills, respite & recreation, individual & family support, community development, equipment & technology and therapy. * Currently, we support over 13,000 people. * Our work focuses on supporting people with disability to participate as fully in their communities as possible, particularly through education and employment.   **What is the preferred architecture of the payment system?**  Northcott supports an approach to social support which is:   * individualised to a person’s circumstance, recognising that not all people within a given cohort experience challenges or barriers to the same extent or in the same way; * flexible in its delivery so that supports are provided in the way that best meets the individual’s needs and choices; * responsive to a person’s changing needs.   A simplified system of payments and pensions with a well-developed supplement system could deliver fair and equitable payments to people which meet their needs and reflect their specific circumstances. To do this, we propose a supplement system where supplement items are scaled rather than one-size-fits-all. In this way, a person who needs financial support specific to their education may receive a supplement that reflects their individual costs (be those costs associated with fees, books, tools or other materials). Similarly, a person with disability who has full, partial or no capacity for work may still receive a supplement which accurately reflects their personal costs associated with their disability, whether these costs are associated with personal care, aids and equipment, living skill development or other areas of life specific to a person’s disability.  Supplements to support a person in their caring role, to support a person to gain qualifications or to support a person to seek and retain employment should each be treated separately to avoid duplication across supplement types (e.g. ensuring funds for the same item aren’t covered by multiple supplements), though a person’s eligibility for each supplement should be assessed holistically. This will ensure that the correct ‘package’ or ‘bundle’ of funds is available for each person receiving income support to meet their specific needs and goals.  Northcott would caution against development of a supplement system where supplements are too narrowly defined in their eligibility/applicability. Our experience shows us that tightly defined criteria can lead to exclusions where support is in fact appropriate. Such a situation causes people to ‘fall through the gaps’ between supports – we often see this occur for people with disability whose conditions are not deemed severe enough for one support but too severe for another. People experiencing dual diagnosis are another such cohort.  It is also critical that the supplement system is developed with reference to the supports already available, and that a full and accurate picture of these supports informs its development. In particular, Northcott is keen to ensure that the National Disability Insurance Scheme is not seen as a panacea which will meet all support needs of all people with disability. At full roll-out in 2019-20, the Scheme will support 410,000 people with disability. This is a significantly greater number than currently receive disability support through the various state and federal programs, but it is still not everyone.  People who do not meet the eligibility requirements for the NDIS may include people who do not meet the functional requirements – that is to say, people whose conditions are not severe enough to merit an individual support package through the NDIS. It would be simplistic and wrong to suggest that people with disability whose functional capacity is greater than NDIS eligibility allows would therefore need no additional support through the universal social services system. Indeed, many of the people we currently support through our prevocational programs would struggle to attain employment without this targeted support. The new social support system must ensure that people are provided with the income and other supports needed to ensure that they live full and participatory lives, not assume that adjacent portfolios will cover requirements for all people within a given cohort.  Further, it is important that the Reference Group understand that a key design feature of the NDIS is the fact that this Scheme only funds necessary and reasonable disability supports which are not the responsibility of another section of government or the community. As such, it can’t be expected that a person’s educational or health costs will be picked up by the Scheme, for example, if they have an individual package. Such costs will continue to need to be met elsewhere in the system, and there will be a role for income support here.  **Should people with a permanent impairment and no capacity to work receive a separate payment from other working age recipients?**  All people should receive rates of payment which support them to achieve active, healthy lives involved in their community. Rather than consider that a person with work capacity should receive less than a person with no capacity, the minimum payment must be high enough to afford job seekers and people with partial capacity to work a reasonable quality of life. It would then be appropriate for people who will always have no capacity to work to receive a higher amount than this, recognising that over their lifetime their earning capacity will remain static (though adjusted for inflation and community norms). This will allow people with no capacity to work the ability to make some savings over their life and enjoy a sense of financial security as well as being able to make modest lifestyle and purchasing choices within community living standards.  **Other comments**  We make the following comments in response to two items noted in this section of the report.  The report states that ‘to align Disability Support Pension with contemporary disability policy the payment needs to better differentiate between permanent and temporary incapacity’. This is a curious assertion, when the focus of contemporary disability policy is firmly on individualised supports which focus on the circumstances and goals of each person rather than on their diagnosis. Better alignment with contemporary disability policy would see a system where people are supported to live their lives the way they choose through the provision of supports which are responsive to changing circumstances.  The report also states that ‘providing support to people with an incapacity which recognises the possibility of future participation could foster greater confidence and skills acquisition and contribute to breaking down stereotypes of what people with disabilities can achieve’. We agree, though it must be noted that the process of skilling people for work does not break down barriers to employment in and of itself. Other concerted efforts will also be required, including significant employer engagement. This is discussed later in our submission. |
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### Support for families with children and young people

**Page 65 to 68** of the Interim Report considers how the payments could be changed to improve support to families with children and young people. In shaping the future directions for support for families with children and young people the Reference Group would like feedback on:

* How can we better support families with the costs of children and young people to ensure they complete their education and transition to work?
* In what circumstances should young people be able to access income support in their own right?

| Northcott is an experienced provider of a range of early childhood and school-age services to children with disability and their families. A critical feature of positive early development for children, with and without disability, is access to rich learning environments where social, emotional, cognitive and physical development can be fostered. This is known to set children up on a positive trajectory for school attainment and future employment.  Access to child care is as important for children as it is for their parents. To children, child care provides rich early learning environments and opportunities to socialise with peers, equipping them with key skills associated with school readiness. For parents, child care can facilitate a return to the workforce and the range of positive effects that engagement in work is known to have. This must apply to children with disability and their families just as much as it does to other children.  Children with disability have the same rights to education and care as all other children. Their families have the same needs to get their child into care to facilitate work and to support their development. At present, the early childhood education and care system is fragmented in the way that it responds to children with disability. Inclusion Support Agencies, such as ours, have made a positive impact on mainstream child care centres improving their ability to include children with disability in the classroom, however more can be done as difficulties remain.  Families we support continue to report that some early childhood education and care providers refuse enrolment to children with specific support needs, or refuse enrolment once the number of children with special needs exceeds 10% of the class. We understand that this occurs because providers feel under-resourced to cater to children with additional needs, but must therefore raise this resourcing issue for consideration by the Reference Group as it directly impacts on children’s and families’ ability to access affordable and inclusive child care.  The soon-to-be released Senate Inquiry into the delivery of quality and affordable early childhood education and care services will certainly intersect with this Welfare Review. It is Northcott’s position that the interests of children with disability and their families must be represented in the findings of both this Reference Group and the Senate Committee and upheld in the recommendations. Failure to address the resourcing requirements to include all children with disability in child care if their families choose it will result in children and families receiving inequitable and in some cases inadequate access to care, potentially falling through the gaps which this reform is focused on closing.  Solutions could include expansion of the Inclusion Support Program, so that facilitators can extend their reach to all early childhood education and care providers and provide capacity building activities to the whole early childhood sector to support and promote inclusion of children with disability. Engagement with an Inclusion Support Agency could be linked with Australian Children’s Education and Care Quality Authority (ACECQA) National Standard ratings, with engagement with an ISA and evidence of inclusive practices being a minimum requirement to meet Standard 3.2. |
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### Effective rent assistance

**Page 68 to 71** of the Interim Report considers Rent Assistance and suggests a review to determine the appropriate level of assistance and the best mechanism for adjusting assistance levels over time. In shaping the future directions for Rent Assistance the Reference Group would like feedback on:

* How could Rent Assistance be better targeted to meet the needs of people in public or private rental housing?

| The report notes the number of problems which exist within the current Rent Assistance scheme, largely arising from different rates of growth in the amount funded through the scheme compared to growth in private rental costs. The use of CPI is also identified as an inappropriate index for Rent Assistance.  While housing affordability remains a significant social policy challenge, more people on income support are forced onto the private market. Forced to make up the short-fall between the rent they must pay and the Rent Assistance they receive, other income support is used to cover the cost of rent at the expense of other cost of living items.  From the report:  “Rental housing costs have grown faster than the Consumer Price Index which is used to index Rent Assistance. The 2009 Harmer Review concluded that:  [A] separate index that more appropriately reflects changes in the cost of private rent would have merit [and could] be based on the actual rents paid by income support recipients to obtain a good measure of the actual changes experienced in the particular segment of the market in which this group operates.”  Northcott supports this recommendation as it aligns with our ethic of individualised supports which reflect a person’s real circumstances. An index which is reflective of the true costs of rent for the people we support would be fairer than the current system and should avoid people having to cross-subsidise their rent out of other payments.  With regards to charging rent as a proportion of income, Northcott wishes to advise the Reference Group that this arrangement occurs in disability group homes and supported accommodation facilities, including ours, and is not limited to public housing. Different providers structure their rental agreements differently with their residents, however in many cases a combined board and lodging fee is charged as a percentage of the person’s pension. Put broadly, funds received from funding bodies are put towards the cost of service delivery (support staff, equipment, coordination and in some cases transport) while board and lodging fees are put towards costs such as lease of the property and maintenance as well as food and other shared consumables.  It will be important to ensure that any changes to rent setting policy within the context of this Welfare Review take the needs of people living in supported accommodation facilities into account. |
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## Pillar Two: Strengthening individual and family capability

Reforms are needed to improve lifetime wellbeing by equipping people with skills for employment and increasing their self-reliance. To strengthen individual and family capability changes are proposed in the areas of mutual obligation, early intervention, education and training, improving individual and family functioning and evaluating outcomes.

### Mutual obligation

**Page 80 to 85** of the Interim Report considers more tailored and broadening of mutual obligation and the role of income management. In shaping the future directions for mutual obligation the Reference Group would like feedback on:

* How should participation requirements be better matched to individual circumstances?
* How can carers be better supported to maintain labour market attachment and access employment?
* What is the best way of ensuring that people on income support meet their obligations?
* In what circumstances should income management be applied?

| **How should participation requirements be better matched to individual circumstances?**  The report notes several good options for tailoring participation requirements to individual circumstances, rather than force all people to prepare for and seek work when this may not be appropriate to their situation. Implementation will have to be monitored in order to ensure that the spirit of this approach is not lost and that people’s unique circumstances are the drivers for what constitutes an appropriate set of participation requirements. It will also be important to ensure that participation plans are easily reviewable in the case of changed circumstances, particularly for people with episodic conditions. This may include people with mental health conditions, as mentioned in the report, and may also include people with a range of other disabilities.    The report states that ‘the current participation framework for younger people on Disability Support Pension and those on Newstart Allowance with partial capacity for work could be enhanced so that people have a plan of activities, support services and path to education and employment’. This approach may be effective and the focus on the combination of activities and support to pursue both education and employment is welcome. At implementation, it will be important to ensure that recipients of these payments who are subject to these plans are not required to duplicate such planning processes if they are also supported by other schemes, such as the NDIS. It will also be important that activities are meaningful and linked to goals which are important to the person’s education or employment journey, rather than seeing blanket activity requirements imposed.  **How can carers be better supported to maintain labour market attachment and access employment?**  Labour market attachment for carers ought to be supported through industrial relations and workforce policy rather than being incentivised through welfare. For many carers who have some capacity to work around their caring role, this becomes impossible when workplaces do not make reasonable adjustments. Some progress is being made here – for example the Carers Recognition Act, and some public service employers – but more is yet to be done.  Carer recognition is embedded in the National Employment Standards on flexible working arrangements, but these currently only apply to employees who have already been with an employer for a period of 12 months. This acts as an automatic barrier to carers attempting to enter or re-enter the workforce. Carers should be able to request flexible working arrangements at any time, including upon commencement of employment. Employers should be better informed about the social and business benefits of employing carers and given advice about when adjustments can in fact be made.    **What is the best way of ensuring that people on income support meet their obligations?**  The report states that ‘participation requirements should be accompanied by an appropriate and effective compliance framework. Effectiveness might be improved by giving employment service providers greater management of sanctions, including suspension and penalties. Protections would be required for vulnerable people.’  More detail is needed here as to what is meant by ‘service providers’ and what protections would be in place for whom. As a Disability Employment Services, Northcott would not welcome a requirement to manage sanctions, suspensions or penalties on behalf of people we support. |
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### Early intervention

**Page 85 to 88** of the Interim Report considers risked based analysis to target early intervention and investment and targeting policies and programmes to children at risk. In shaping the future directions for early intervention the Reference Group would like feedback on:

* How can programmes similar to the New Zealand investment model be adapted and implemented in Australia?
* How can the social support system better deliver early intervention for children at risk?

| **Investment model**  Northcott supports the investment model of social spending. This model underpins the design of the NDIS, which we fully support, and has been shown through international examples to be an effective approach to achieving both positive social outcomes and long-term economic savings. This can apply easily to the cohort mentioned in the NZ case study as well as to other cohorts. Early intervention in regards to employment options for young people with disability should also be considered in this review. There should be recognition that the skill-development activities offered to this cohort may require alternative delivery methods or timeframes.  **Children at risk**  Little information is given in the report which can guide an answer regarding targeting children at risk given that no commentary was provided about how the Commonwealth could work with the states and territories around this. Targeting services to families with at-risk children is particularly difficult given the involuntary nature of many statutory services and the not-quite-voluntary nature of other services which may be seen as pathways into statutory services. Our experience in the delivery of Intensive Family Support – a service established with the purpose of preventing premature entry into Out of Home Care for children with disability – shows us that families respond most willingly to service intervention when they feel they have referred themselves for a service rather than have had one forced upon them. Any support system developed as an outcome of this Welfare Review would need to be highly cognisant of this. |
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### Education and Training

**Page 89 to 90** of the Interim Report considers the need for a stronger focus on foundation skills in both schools and vocational education and training, and on transitions from school to work. In shaping the future directions for education and training the Reference Group would like feedback on:

* What can be done to improve access to literacy, numeracy and job relevant training for young people at risk of unemployment?
* How can early intervention and prevention programmes more effectively improve skills for young people?
* How can a focus on ‘earn or learn’ for young Australians be enhanced?

| Northcott, as well as other providers, offers a range of foundation and vocational skills supports and programs to people with disability who are seeking or preparing to seek work.  Our services include a Transition to Work program which is funded across NSW but not in other jurisdictions. This two-year job readiness program is targeted at school leavers who can be seen to have a future capacity for work but who are not yet ready to enter the job market. Transition to Work participants access both group and individual learning opportunities to develop foundation and vocational skills, access work placements and receive support to develop a range of other life and social skills which will assist them to retain work in the future. This model of service could be offered to any school leaver not yet ready to commence employment, with skill development modules offered based on the participants within a particular service, their development goals and vocational interests.  We are also a Disability Employment Service and offer employment support to people with disability in the open job market. Through this service we are able to provide one-on-one pre- and post-employment support to both job seekers/employees and their employers as well as job seeker hubs where people may access job boards and prepare job applications, as well as meet other job seekers and share experiences about what has helped them in finding and retaining employment. This model works, and achieves long-term employment outcomes for people with disability. The model could be supported to work more effectively and assist greater numbers of people with disability into employment if performance and compliance monitoring requirements were simplified.  Expansion of pathways to educational attainment could also make the pursuit of qualifications an option for more young people, including young people with disability. Recent TAFE cuts in a number of jurisdictions, including NSW, work against this. Many people with disability have complex learning support requirements such as Auslan interpreters, note-takers, reader/writers, 1:1 learner support, mentoring, counselling and advocacy and others. All of these supports require a substantial time investment by a designated person (interpreter, mentor, counsellor, etc). Without these support options, many students with disability would not be able to complete their chosen course. This creates barriers to workforce participation and engagement in civic life. These students have the right to access education and, with the right support, the capacity to go on to have meaningful and fulfilling careers.  Having available a wide range of educational supports will be the best option for the greatest number of young people to attain qualifications and commence work, including young people with disability. |
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### Improving individual and family functioning

**Page 90 to 93** of the Interim Report considers cost effective approaches that support employment outcomes by improving family functioning and the provision of services especially to people with mental health conditions to assist them to stabilise their lives and engage in education, work and social activities. In shaping the future directions for improving individual and family functioning, the Reference Group would like feedback on:

* How can services enhance family functioning to improve employment outcomes?
* How can services be improved to achieve employment and social participation for people with complex needs?

| **Family functioning**  The report suggests parenting skills training as a mutual obligation strategy aimed at improving family functioning. This could be an appropriate option for some families. Policymakers would need to be aware, however, of the issue of forced compliance and whether or not this strategy will actually have its intended effects. A better idea may be to offer a suite of options focused on improving functioning, including parenting skills, respectful relationships, mental health self care, and more. Participants could choose the course(s) that were most relevant for them, ensuring that people are empowered to make their own assessments of their psychosocial needs and improving chances of engagement in the training.  A range of delivery methods should also be considered, so that people in regional and remote areas are also able to make these choices. Online delivery could be one option, either from a person’s home computer or from a Job Centre.  **People with complex needs**  The same model could be applied to people with complex needs, whether those needs are associated with mental health, disability or other personal circumstances. For this cohort, services need to be responsive to changing needs, and able to respond quickly. The NDIS gives a good model for this, with changes in circumstance able to be reviewed and support packages altered within two days. Requirements to engage in capacity building activities such as those being discussed here could operate on a continuum based on the person’s wellness and work capacity, with engagement in capacity building activities bridging the gap between a person’s inability and ability to work. |
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## Pillar Three: Engaging with employers

Employers play a key role in improving outcomes for people on income support by providing jobs. Reforms are needed to ensure that the social support system effectively engages with employers and has an employment focus. These reforms include making jobs available, improving pathways to employment and supporting employers.

### Improving pathways to employment

**Page 101 to 107** of the Interim Report considers the different pathways to employment for disadvantaged job seekers such as vocational education and training and mental health support models. In shaping the future directions for improving pathways to employment the Reference Group would like feedback on:

* How can transition pathways for disadvantaged job seekers, including young people, be enhanced?
* How can vocational education and training into real jobs be better targeted?
* How can approaches like Individual Placement and Support that combine vocational rehabilitation and personal support for people with mental health conditions be adapted and expanded?

| Earlier in this submission, we have described out Transition to Work program as a pre-vocational option for school leavers who will have future work capacity. This program ought to be more widely available, as part of a continuum of employment supports available depending on a person’s varying needs and skills. Such a continuum of supports should include programs like Transition to Work and Disability Employment Services as well as other supports, e.g. a hybrid service combining these two models, a service which offers more intensive, short-term pre-vocational skills, etc.  Ultimately, employment pathways need jobs to which to lead. A significant amount of work remains to be done in engaging prospective employers and reducing stigma associated with employing people with disability, people who are long-term unemployed and others. We refer many prospective employers to the Australian Government’s Job Access website, and receive consistent feedback that this portal is a useful resource for people considering hiring a person with disability. Wider communication of the utility of this website would be warranted.   We are aware that there is a looming skills shortage arising through the roll-out of the NDIS, with the size of the sector needing to double between the commencement of the Scheme last year and its full roll-out in 2019-20. Pathways which support people into jobs within this sector should be seriously considered as a matter of some urgency. As an employer within the sector, we hire people from a range of backgrounds and with a range of qualifications, including some people without qualifications if they can demonstrate the requisite skills and attitudes. It should therefore be considered by the Reference Group that there are more pathways into the disability sector than the traditional Certificate III or IV courses, though of course these are also valid. |
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### Supporting employers

**Page 108 to 110** of the Interim Report considers what can be done to support employers employ more people that are on income support including better job matching, wage subsidies and less red tape. In shaping the future directions for supporting employers the Reference Group would like feedback on:

* How can an employment focus be embedded across all employment and support services?
* How can the job services system be improved to enhance job matching and effective assessment of income support recipients?
* How can the administrative burden on employers and job service providers be reduced?

| **How can the job services system be improved?**  Current performance measures are timed directly from a person’s commencement with the job service, with employment outcomes or milestones due to be achieved at 13 and 26 weeks from this date. This limits the amount of time a job service has to spend with each job seeker in assessment and exploration of needs, abilities, limitations, vocational interests, etc. These factors are important for determining a sustainable job match and can take some time to assess depending on a person’s job readiness, self awareness, previous experiences and other factors. Better matches could be achieved if sufficient assessment and exploration time were available rather than having to rush into work towards a 13-week outcome.  The job services system and the Centrelink system are predominantly focused on quantitative rather than qualitative outcomes. There is a prevailing sense that "a job is a job and any job will do". This approach has its merits if supported by thorough career planning and progression support for a person to move from this first job to a more suitable job. The current system, however, does not support this crucial next step. Specialist disability services have provided this support in the past, but this is now being lost as a result of the way the performance framework measures outcomes and funds services. A renewed focus on employment outcomes to get people ‘the right job’ and to assist them onto a career path would be welcome and would drive significant improvements in job matching and retention.  **How can the administrative burden on employers and job service providers be reduced?**  A simplified system and set of guidelines could greatly reduce administrative and compliance burdens for job service providers. In our own experience, there are significant additional reporting requirements for our Disability Employment Service compared to our state-funded Transition to Work program. These are exacerbated by the multiple payment types which require different treatment in administration.  The administrative burden could also be reduced if the range of acceptable evidence were broadened. Current requirements are very rigid, for example the obligation for a person on income support to provide a copy of every payslip even though Year-To-Date information is included on each slip. This increases administration considerably and creates concerns about privacy for some participants. A common sense approach to acceptable evidence which agrees to receive evidence of a person’s income via a range of means and without unnecessary duplication would be welcome. |
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## Pillar Four: Building community capacity

Vibrant communities create employment and social participation for individuals, families and groups. Investments by government, business and civil society play an important role in strengthening communities. Also, access to technology and community resilience helps communities build capacity. Building community capacity is an effective force for positive change, especially for disadvantaged communities.

### Role of civil society

**Page 112 to 116** of the Interim Report considers the role of civil society in building community capacity. In shaping the future directions for the role of civil society the Reference Group would like feedback on:

* How can the expertise and resources of corporates and philanthropic investors drive innovative solutions for disadvantaged communities?
* How can the Community Business Partnership be leveraged to increase the rate of philanthropic giving of individuals and corporates?
* How can disadvantaged job seekers be encouraged to participate in their community to improve their employment outcomes?

| **How can the expertise and resources of corporates and philanthropic investors drive innovative solutions for disadvantaged communities?**  Corporate and philanthropic investors have significant purchasing power. Those with an interest in social returns on investment, in corporate social responsibility or in philanthropy for other purposes are well placed to contribute funds towards research and evaluation projects as well as pilot programs. There is scope for many projects here which could contribute to improving outcomes for disadvantaged communities, particularly through employment outcomes and projects which support that community’s economy.  Corporate volunteering by people with specific skill sets or expertise could also support such projects and the implementation of innovative ideas which have been developed together with the community. As a charitable organisation, we have experienced corporate volunteering and pro bono delivery on a range of projects and services. Other charitable entities and community groups could be supported to make similar relationships.  **How can the Community Business Partnership be leveraged to increase the rate of philanthropic giving of individuals and corporates?**  The Community Business Partnership could be leveraged through making staff who have a particular expertise available to develop models which demonstrate the economic and social benefits of  improving outcomes for people from disadvantaged communities and then present these models or findings to broader circles. Members of such partnerships are typically highly skilled networkers and could utilise their networks to encourage others to provide philanthropic support to or investment in the sector. |
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### Role of government

**Page 116 to 120** of the Interim Report considers the role of government in building community capacity. In shaping the future directions for the role of government the Reference Group would like feedback on:

* How can community capacity building initiatives be evaluated to ensure they achieve desired outcomes?
* How can the income management model be developed to build community capacity?

| It is Northcott’s position that any community capacity building initiative must include the recipients or benefactors of the initiative in the co-design of the both the program itself and the evaluation. The voices of people who we set out to help through each initiative should be heard clearly when looking at what has worked well and what could be done better.  In line with contemporary disability policy, we recommend an evaluation framework which focuses on outcomes rather than outputs or other quantitative measures if they lack qualitative dimensions. |
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### Access to technology

**Page 124 to 125** of the Interim Report considers access to affordable technology and its role in building community capacity. In shaping the future directions for access to technology the Reference Group would like feedback on:

* How can disadvantaged job seekers’ access to information and communication technology be improved?

| Within our Disability Employment Service, we offer a ‘Job Club’ which functions as both a social hub for job seekers to share their successes and motivate each other as well as offering access to computer terminals for the purpose of job searching, preparing and submitting job applications, finding career information, etc. A success factor of this model is the ready access to Employment Advisors if a job seeker encounters difficulty while conducting their job search or if they have a question for which they can’t find an answer.  Expansion of hubs such as our Job Club across wider areas and in multiple community-based locations within a given employment services area could be one strategy for improving job seeker access to communication technology. |
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