



DEWR Shaping the Future of Employment Services Consultation.

Response from the Institute of
Employability Professionals.

Institute of Employability Professionals

✉ enquiries@iemployability.org

🌐 www.myiep.uk
www.myiep.com.au



About the IEP

The Institute of Employability Professionals (the IEP) is pleased to offer a response to the Consultation Document; we encourage the directions it proposes and offer ongoing practical support for professional development of services.

The IEP is the global professional Institute building an ecosystem for employability excellence, bringing together professional development, quality improvement, expert insight and international collaboration and evidenced best practice to support better outcomes across the world.

We are dedicated to supporting the people who support others gain work, progress in work and retain work. We empower employability professionals and their organisations to deliver to a high professional standard, champion employability as a recognised profession, strengthen excellence in practice through global knowledge exchange, and create wide ranging networks of opportunity. IEP's membership spans large volume providers operating at industrial scale and small specialist organisations working daily with people furthest from the labour market.

The IEP is active in Australia, the UK, Sweden, the Gulf states, and Canada and with working co-operation with the World Association of Public Employment Services (WAPES). As well as its range of member services, the IEP supports organisations to adapt and adopt its Quality Improvement Framework and runs development projects (Centres of Excellence) in the partner countries, an international Centre of Excellence, a Learning Academy, professional Journal, an international Seminar series and a database of research.

The IEP has previously responded to Australian consultations, including the DEA Vision for a Centre for Disability Employment Excellence and the consultation on Rebuilding Employment Services: Final report on Workforce Australia Employment Services to the Select Committee on Workforce Australia Employment Services. In each case we are supportive of the initiatives being proposed, and feel that we can support, contribute and help shape the results.

Our response

Four Core Ideals

1. Employment is the primary goal

That employment is the 'primary goal' of an employment service is uncontroversial. But there is an ambiguity in the phrasing: "Services help them become capable, confident, and qualified and the settings for mutual obligations are designed to enable this." To be effective, the capability confidence and qualifications apply not only to the expected job (which may not yet be defined in the participant's goals) but also to their competence to choose an occupation, find an opportunity, compete against others, and retain employment. These latter are elements of capability that support success both in the present and in the longer term. The 'the settings for mutual obligations' remain ambiguous in the document and could, unless managed with the core confidence and competence in mind, undermine success.

2. Supports are meaningful to the participant

The statement is absolutely welcome, and hints at a valuable shift towards better and well-evidenced practice. What may be missing is the understanding that participants are not only active, but also, in good employment practice, become leaders and choosers of their own goals and activities. This needs building into the later detail.

3. The system is easy to navigate

This is welcome. It needs to be enacted through evidence based behavioural quality standards. Previous experience shows that using contract compliance and performance measurement does not fulfil the need. As a professional body of employability practitioners, the IEP is more than willing to assist in developing standards for the new service.

4. The system is designed and stewarded by the Australian Public Service

This seems uncontroversial. Bear in mind that the public service, while ultimately responsible (the steward) is not the sole body equipped to 'design', 'improve' and 'respond'; a great deal is known from research and programmes worldwide, much originating in Australia some decades ago, about what works, and how. Implementation always requires expertise and care, and the IEP is more than willing to assist.

Three Streams

We welcome the inclusion of triage or assessment and development of strands of service, along with closer tailoring to the individual's and employer's needs. Streaming is not new and exists in most services; however, it does not always lead to effective supports and may (the UK has experience of this) potentially do harm, as when access to support is conditional of duration of unemployment, though the need is present from day one. Other perhaps more helpfully instructive examples are the Belgian VDAB's digital-first tier, France Travail's *suivi et appui* stream, and Estonia's lower-intensity track.

Consequently, the provision of assessment 'at the point of entering employment services, so that they are connected with the right service at the right time' is essential. Done well and thoroughly, it is the mechanism by which downstream costs are reduced, by eliminating misallocation, provider parking, and the cycling-in-and-out pattern the paper documents. So, any focus on early costs is likely to be misplaced: the whole-programme rewards for society and participants are what is to be considered.

As a caution, we note that the description of the new assessment (page 23) is of things, all useful in themselves, that are focussed on doing things *to* the participant, and less on *with* the participant. This suggests that the vision is for what is necessary but also may not be sufficient. The difference between an effective employment plan and an administrative compliance instrument is not process design, it is whether the participant's own aspirations and agency are the organising logic.

The Employment Goal Plan is under-described. Much is known about how such plans operate, including how they can become bureaucratic measures of programme performance instead of enabling and confidence-building practices. Again, the IEP and its professional members are offering to support and help build the best models for such plans.

Mutual Obligations are not well described. The text (p25) has both positive ('Requirements will be fair, proportionate and based on individual circumstances') and negative connotations ('will be scaled as people move closer to work') that hint at the known harmful effects of sanctions. So, for example 'building their capacity for work by connecting them to in-demand skills and training opportunities' (p26 para 1) would, if taken literally, place limits on acceptable actions, Employment Goal Plans and routes into employment, by applying a too-narrow definition of obligations. But we feel the approach suggested is moving in a humane direction and support such changes.

Employer Engagement

The phrase 'International evidence suggests that actively engaging employers as partners is required to strengthen employer engagement.' seems to be circular. But there's nothing to disagree with in the implied spirit.

There is a body of experience concerning a 'focus on building strategic partnerships with industry and large employers to create jobs and skills pathways for job seekers.' The IEP will be able to make connections to current and historic examples.

The need for, and ways to achieve, local labour market co-ordination and place-based mechanisms are also quite well understood. They are most successful when they operate in close and in-person contact with employers and involve diverse local institutions.

We acknowledge the practical value of job-matching services and platforms. But we also caution against over reliance on them: the content (however well curated) rarely matches the essential detail that is required in occupational choice and job placing. They are an adjunct to, not substitute for, direct employer and job-task engagement.

Frontline Staff, diverse cohorts, better connections, local solutions

We agree that 'the diverse needs of people in employment services will require frontline staff with the right skills and capabilities to respond'. There is a large body of evidence about those skills, replicated in diverse settings and administrations. That evidence shows that both skills and quality improvement processes have descriptors that underpin services to all cohorts or groups of participants, albeit their implementation may vary somewhat between groups to address their unique needs. Core quality factors are foundational; delivery arrangements need to be focussed.

For providers to have the capability effectively to support the unique needs of different cohorts requires their staff and local delivery partnerships to be resourced and equipped with relevant skills and systematic competencies, and ability to work closely with local communities. This can only happen in a service that has continuity of employment for staff and of delivery mechanisms (organisations can change – professional quality should not) and is resourced to support professional development and (eventually) accreditation.

The IEP has a growing suite of learning and skill development opportunities, including specialisms that apply to different service intensities and participant circumstances, which we can share and adjust as the new service develops. The Centre for Employability Excellence can also contribute importantly to enlisting both international experience, experience of local engagement and partnership working, and linking Australian providers and commissioners to an international debate on 'what works' and related issues.

Payment regimes, performance measures

We agree that these are difficult and complex areas and carry risks of encouraging maladaptive delivery behaviours. The very short description relating to targeted provider services incentives and to intensive services incentives are too vague for meaningful comment. Developing a fair, targeted and purposeful system will involve discussion, negotiation, study of exemplary measures and in some degree, political decisions about risk-sharing and moral hazard. We think the discussion needs to be open and shared while being aware of the self-interests involved. It needs to take account of developments over recent years, such as (to cite examples) the work done on 'distance-travelled', local partnerships, delivery within housing, drug abuse, minority or probation settings, employer-led delivery and user-led design; and to be linked to the issue of subsidy and employer-fees / costs. Even these few examples show that an over-simple system might not fit the bill, and equally over-complexity brings bureaucratic costs and wasted effort.

Continuous Improvement

The IEP has several important projects to develop constant and targeted improvement in service outcomes and quality. Its Centre for Employability Excellence has developed the Quality Improvement Framework (QIF), an evidence-based behavioural description of quality mechanisms and employment guidance with frontline, partnership and leadership activities. The QIF is neutral about contracts and about legislative arrangements, and is being used and adapted in Australia, Sweden, Northern Ireland, Saudi Arabia, and, in the UK, to help the Department for Work and Pensions' new combined Jobs and Careers Service change to a delivery model quite closely aligned to the Consultation Paper.

For DWP In the UK, this has involved

- An in-person consultative discovery of the key organisational changes, obstacles and opportunities.
- Supporting culture change, in a direction very similar to that proposed in the Consultation document.
- Adapting the QIF to provide a valuable tool for internal use by managers and staff.
- Creating a coaching and learning academy, learning materials and environment.

Other developments are working on the use of AI in service refinements, issues of programme recruitment and retention, local authority-led services focussing on selected employment sectors.

Conclusion

You can't legislate for quality. When you do, systems and people adapt to the legislation (not always positively) and adapt less to clients and labour markets.

Granted contract compliance is a necessity, contract domination of daily practice is not. We can draw parallels with the medical professions. This is not to medicalise our work, which would go in quite the wrong direction, but to acknowledge their professional scientific and organisational maturity. In health settings, we see governments making important judgements about funding and access; but the treatment and clinical procedure properly belong with professionals trained and organised in the required competences, working within mature ethical frameworks and, crucially co-operating with a strong body of scientific and technical research and progress.



We argue that a similar development is needed in employability and note that it will require time and effort from all partners to make it happen. It can begin with a co-operative discussion between government, providers, users, community partners.

Along the way, the 'direction of travel' of the current consultation is welcome though important detail is still missing. But successful implementation, testing and progressive professionalisation is the route to a stable service of growing effectiveness.

The IEP therefore endorses the overall view – with caveats – but calls for a longer and more thorough debate about professionalisation of services. Contract and policy design is important to that debate; so too is the science behind and practice of employability, as are culture and ethical or political choice. We feel it worth remembering that employability practitioner skills and quality improvement activities are universal and, for the most part, well understood. Adjustment of intensity and type of service to the needs of individuals and of cohorts is part of that universality.

The IEP has taken this holistic view into practice through its collaborations with government (City Councils, Central Departments and agencies, WAPES) and with providers in several countries. We would welcome and take a thoroughly positive and long-term approach to a discussion with Ministers and senior and frontline officials and providers.

Within that, we could begin with thoughts on

- Means to review, plan, test and implement professionalisation.
- Refining and applying the Quality Improvement Framework in and for the Australian context.
- Contributing to and helping develop skills and competencies for front-line staff AND managers.
- Expand the work of the Centre for Employability Excellence in Australia in support of these aims. This can immediately include space for a widespread Australian debate in our Perspectives Seminar Series.
- How best to address the underlying need to professionalise the services, and to work with providers on foundational change; necessarily slow-acting (several years) but fundamental to defining and providing quality beyond the current thinking.



Institute of Employability Professionals (IEP) Limited
3rd Floor
86-90 Paul Street
London EC2A 4NE

IEP Australia
Level 6
35 Chandos Street
St Leonards
NSW 2065

Tel: +44(0)20 3974 2033 (IEP HQ)
Email: enquiries@iemployability.org
Web: www.myiep.uk www.myiep.com.au www.myiep.se