



Australian Government

Community Development Programme



GUIDELINES HANDBOOK

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Disclaimer

This Guideline Handbook is not a stand-alone document and does not contain the entirety of Providers' obligations.

It **must** be read in conjunction with the CDP Funding Agreement and any relevant Guidelines or reference material issued by Department of the Prime Minister and Cabinet under or in connection with the CDP Funding Agreement.

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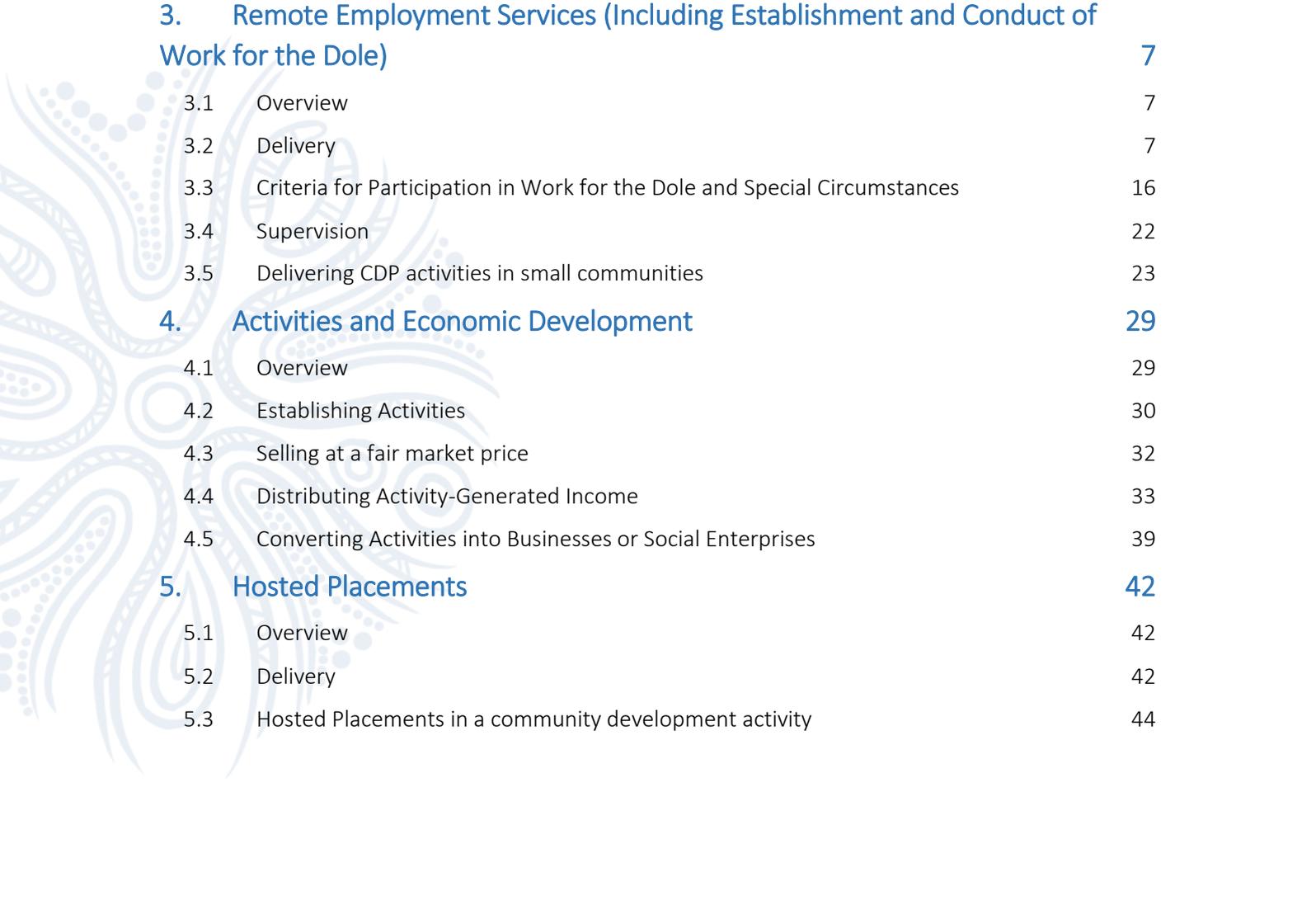
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Community Development Programme Guidelines Handbook

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1. Introduction

1.1 About these Guidelines

The Community Development Programme (CDP) commenced on 1 July 2015. The CDP is a remote employment and community development service which helps people to find work, and allows them to contribute to their community and gain skills while looking for work. The Australian Government through the Department of the Prime Minister and Cabinet (PM&C) manages the CDP. As part of this, PM&C is responsible for funding, managing, and monitoring CDP Funding Agreements.

This document provides programme details to support the CDP Funding Agreement.

1.2 Using the Guidelines

These Guidelines have been produced solely as a web-based document on the Provider Portal secure site and not in hard copy. Updates will be posted on the Provider Portal secure site. The front page of the site will regularly advise of any changes and the date on which they are published.

Should you wish to print a hard copy of these Guidelines, you should regularly cross check your printed version with the online version. The online version will always take precedence over a printed version of these Guidelines.

1.3 About the Community Development Programme (CDP)

The Government has reformed remote employment services to better reflect the aspirations of people in remote Australia. The reforms will lead to practical outcomes and help community members to help themselves.

Flexible and focussed on local decision making and local solutions, the CDP is an essential part of the Australian Government's agenda for increasing employment and breaking the cycle of welfare dependency in remote areas of Australia.

The CDP is delivered in 60 regions and more than 1,000 communities. A CDP provider is a single point of contact for job seekers and employers in each CDP region. CDP assists unemployed remote job seekers to build employable skills while contributing to their community.

Under the CDP, providers deliver Remote Services. There are two key types of services that assist job seekers:

Basic Services – integrated case management and support for job seekers to find and keep a job and to meet their mutual obligation requirements;

Remote Employment Services –work-like activities; one or more of which, job seekers participate in five days a week. Activities reflect local employment opportunities and/or are relevant to community aspirations and meet community needs.

For the purposes of these Guidelines, Remote Services includes Basic Services and Remote Employment Services, which includes establishment and conduct of Work for the Dole.

The majority of job seekers will participate in Work for the Dole activities as they are the principal activities that will put an end to passive welfare, build employability skills, and assist job seekers to transition from welfare to work.

The term ‘job seeker’ in these Guidelines means an ‘Eligible Job Seeker’ as outlined in the CDP Funding Agreement.

For the purposes of these Guidelines the term mutual obligation requirements includes ‘Social Security Activity Test Requirements’ or ‘SS Activity Test Requirements’.

The CDP Provider Code of Practice and Service Guarantee is another relevant resource for providers. This outlines the principles and standards that underpin the delivery of CDP and what job seekers and communities can expect from services delivered by CDP providers.





2. Basic Services

2.1 Overview

Providers are required to deliver Basic Services to all job seekers. This includes providing integrated case management and support to assist job seekers to find and keep a job, and meet their mutual obligation requirements. It also includes other suitable activities (refer 3.3 *Criteria for Participation in Work for the Dole and Special Circumstances*).

In RAC1 of the CDP Funding Agreement job seeker mutual obligations are included in the definition of “Social Security Activity Test Requirements”.

2.2 Delivery

As part of Basic Services, providers must prepare and maintain Job Plans. Providers must support job seekers to meet the requirements outlined in their Job Plan and to help job seekers into paid work.

Providers must also deliver the following employment assistance to job seekers:

- provide suitable activities to allow all job seekers to meet their mutual obligations;
- help in searching and applying for jobs, including: providing reasonable access to job search facilities, creating online resumes, and support preparing for interviews;
- provide on-the-job training, Mentoring and Post-placement Support;

Providers are encouraged to link with non-government organisations that have existing resources, social capital, and expertise in delivering these services. Providers must also provide services that involve community and employer engagement activities in order to assist job seekers to find employment.

It is important that providers maintain a minimum of monthly contact with job seekers. This includes maintaining referral and registration services, undertaking initial interviews, assessments and ongoing contact with their job seekers. It also includes managing the exit of job seekers from CDP.

Active job seeker compliance monitoring and reporting is also central to Basic Services.

For further information about job seeker compliance refer to the *Job Seeker Compliance Framework User Guide*, *Job Plan User Guide* and *Job Plan Task Card*.

Case Study – Basic Services

Jess attends her initial interview with her provider who conducts an assessment (including conducting the Job Seeker Classification Instrument [JSCI]) to determine her barriers to employment, to get a better understanding of her current interests, and to ascertain her level of skills and education. She is assessed as requiring Basic Services because she is 51 and is receiving income through mining royalties.

In her initial interview, the provider works with Jess to identify the types of jobs she would like to find and they put together her Job Plan. As Jess would like a role working with her local community, the provider enrolls her in a course to obtain her First Aid Certificate.

While Jess completes her training she works with the provider to look for job vacancies. The provider finds a role as a Community Care officer working with the local regional council. She is given assistance to update her resume and to write a job application. Jess is successful in gaining an interview and with the help of her provider does research about the role and practices mock interview questions to prepare for the interview.

Jess gets the job and loves working in her new role. Whenever she has a question (for example when she was unsure about what to wear on her first day of work) she feels happy knowing she can always ask her provider if she feels stuck. Jess' provider records a Job Placement in the IT system and after Jess has been in her new job for 13 weeks the provider receives an Employment Outcome Payment of \$2,250. After an additional 13 weeks – once Jess has been in her new community care role for a total of 26 weeks – the provider receives an additional \$5,250.

Over at least 26 weeks the provider offers Post-placement Support to Jess when she needs it to make sure she is able to address training and cultural barriers. The provider receives a Basic Service payment during this 26 week period.

2.3 Eligibility

All job seekers on a provider's caseload are Eligible Job Seekers for Basic Services. Broadly, if an individual is on Income Support and resides in remote Australia they will be eligible for CDP.

The eligibility of a job seeker is generally determined by the Department of Human Services (DHS), before they are referred to a provider. However, providers can also directly register job seekers if they meet the relevant criteria for direct registration. See the *CDP Eligibility Fact Sheet* on the Provider Portal for more information on job seekers that can be directly registered in CDP.

Many job seekers are eligible to undertake Work for the Dole activities. For further information on Work for the Dole activities refer to *Chapter 3 – Remote Employment Services (Including Establishment and Conduct of Work for the Dole)*.

Job seekers who are not required to do Work for the Dole activities receive Basic Services, unless they agree to do Work for the Dole activities.

Work for the Dole activities offer all job seekers valuable work-like skills while contributing to community, so participating in Work for the Dole should be encouraged.

Additional services must be offered for vulnerable job seekers or job seekers with a disability consistent with the General Terms and Conditions of the CDP Funding Agreement – see *Chapter 7 – Participating in the CDP*.

For further information on Income Support eligibility please contact the Department of Human Services.

Supporting people who are not eligible for income support

Providers can provide Basic Services and Remote Employment Services (Work for the Dole activities) to individuals who are not Eligible Job Seekers (known as ‘CDP Ineligible Participants’ under the CDP Funding Agreement).

Where the CDP Ineligible Participant wants to participate in Services or activities, the provider should speak with the PM&C Regional Manager and seek approval for funding to deliver services if appropriate.

The circumstances under which the PM&C Regional Manager would approve funding to deliver services to a CDP Ineligible Participant would depend on the individual circumstances of the job seeker and the particular remote region. The PM&C Regional Manager will consider the business case submitted by the provider, which should include why CDP is the most appropriate service for the job seeker, what assistance the provider can deliver to the job seeker, the details of the Work for the Dole activity they want to participate in (if applicable), and the benefits to the job seeker and the community.

There may be instances where the provider will receive payment for the provision of Basic Services or Remote Employment Services to CDP Ineligible Participants. At the time of any approval, PM&C will notify the relevant provider about the details for providing Services to CDP Ineligible Participants (and this notice will expressly authorise those details for the purposes of this Guideline).







3. Remote Employment Services (Including Establishment and Conduct of Work for the Dole)

3.1 Overview

Providers are required to establish and conduct Work for the Dole activities and place the following job seekers in those activities:

- All job seekers who meet the criteria for participation in Work for the Dole, which are specified in section 3.3 below; and
- Any other Eligible Job Seeker who chooses to participate in Work for the Dole. (Note: this does not include CDP Ineligible Participants unless PM&C Regional Manager approval is given, see section 2.3.)

Work for the Dole activities should be work-like, reflecting local employment opportunities, or be relevant to community aspirations and meet community needs.

Work for the Dole activities must be safe and, where applicable, allow job seekers to fulfil their mutual obligations (in RAC1 of the CDP Funding Agreement, these mutual obligations are included in the definition of “Social Security Activity Test Requirements”).

3.2 Delivery

Providers should deliver a mix of Work for the Dole activities that:

- Establish a daily work-like routine for the job seeker, five days a week (Monday to Friday); and
- Are guided by a Supervisor.

Job seekers can be placed in one or more Work for the Dole activities, which should:

- Develop and enhance their ability to work independently;
- Improve or enhance communication skills, motivation, and dependability; and
- Where possible, provide the job seeker with experience working as part of a team.

PM&C Account Managers are available to support providers to work with communities and job seekers to establish meaningful and engaging activities.

Case Study – Work for the Dole

Justin is an eligible Work for the Dole job seeker with full time mutual obligation requirements (25 hours a week). To receive his income support payments, Justin must show he is actively looking for work and participating in activities that will help him get into employment. These requirements, known as mutual obligation requirements, are outlined in Justin's Job Plan.

Justin is placed in a local roads construction activity hosted with the local council Monday to Friday for four hours a day. The Host Supervisor records that Justin has attended. Once he finishes up with the council each day Justin also spends one hour participating in a group project run by his CDP provider that focuses on building language, literacy and numeracy skills.

This project supports Justin's ability to undertake his local roads construction activity and improves Justin's employability. The provider records Justin's attendance. In addition to his 25 hours a week in Work for the Dole, Justin also attends regular provider appointments, and goes into his provider's office two days a week to look for a job as agreed in his Job Plan.

Work for the Dole Activities

Over time, a Work for the Dole activity should build a set of skills and experience for the job seeker that provides them with a pathway to real employment.

Work for the Dole activities should be designed to meet the aspirations, capacity and needs of individuals, and wherever possible, communities. Activities should also generate outcomes to benefit the community, like stronger school attendance and improved community safety.

All Work for the Dole activities should be work-like in that they reflect the typical daily work routines and expectation that one would expect to see in any workplace in Australia. This could include set starting times, a reasonable number of hours of activity each day, lunch breaks, meeting with and reporting to supervisors each day, and having clear tasks and responsibilities. All Work for the Dole activities should be delivered across a five day, Monday to Friday, working week.

A Work for the Dole activity can include a job seeker taking up non-vocational and vocational training if it is a necessary or critical component of the Work for the Dole activity or a prerequisite for a job.

Part-time employment is not a Work for the Dole activity. Refer to the *Job Plan Task Card* on the Provider Portal for more information on how to record activities when a job seeker is in employment. Employment should not be recorded in the Job Plan as a Work for the Dole activity.

Work for the Dole activities cannot:

- Generate income without the written approval of the PM&C Regional Manager (see chapter 4 for additional information on *Activity Generated Income*);
- Compete unfairly with existing organisations or businesses;
- Replace or reduce the hours of paid employment in local jobs;

- Include training for training sake, where the training provided is not linked to the activity or a job (see page 14, *Developing Training as a Work for the Dole Activity*);
- Involve the job seeker working with, or assisting in any way, an organisation that is owned or controlled by the job seeker (unless agreed by PM&C); or
- Involve activities that could bring the job seekers, providers or PM&C into disrepute, for example activities in:
 - The sex industry or anything that involves nudity or pornography
 - The gambling industry
 - Any form of illegal activity
 - Any form of high risk activity

Providers must not conduct any Work for the Dole activity, or place any job seeker into a Work for the Dole Activity, that is excluded from PM&C's insurance coverage, without first obtaining written permission from PM&C (see section 9.9- *Managing Risk* for more details about the insurance arrangements). If permission is given, it will be the provider's responsibility to ensure they obtain adequate insurance for any Work for the Dole activity that is not covered by PM&C's insurance.

Providers must ensure that all Work for the Dole activities in which eligible job seekers participate (including those through sub-contracting and host arrangements) are safe and comply with all laws and do not bring the job seeker, the provider or the Australian Government into disrepute.

Case Study – School and Work for the Dole

There is a need to get more children in schools. Going to school and being at school every day gives every child the best chance for a good start in life. Getting children to school is important for stronger communities and may form part of a job seeker's Work for the Dole activities.

Supporting schools in Work for the Dole

Delivering appropriate activities in and around schools will support school engagement and attendance by children in the community whilst assisting job seekers to gain a variety of skills and work-like experiences that could provide them with future employment prospects in the school and related sectors. Because job seekers will be at school, in regular routines, making the school a better place to be, job seekers are also promoting and encouraging parents, children and the community to support school attendance.

The activities listed below, or a combination of them, are examples of a school related activity that job seekers can be required to attend as a compulsory activity in their Job Plan:

- *Supporting a breakfast and lunch program within the school grounds to ensure children get nutritious food, do not arrive hungry or leave school grounds at lunchtime.*
- *Reading to children and listening to them read, assisting with cultural activities and keeping the library functional.*
- *Providing aid during school outings, excursions and other activities.*
- *Organising, promoting and providing posters and other media for school attendance across the region.*
- *Developing and producing a weekly regional school/community radio programme and newsletter.*
- *Small building, maintenance and beautification projects.*
- *Cultural preservation activities (for example participating in cultural excursions or*

skills classes for school-aged children).

In conducting Work for the Dole activities involving schools, providers must ensure that they comply with any requirements under the CDP Funding Agreement and relevant Guidelines, in relation to job seeker Police Checks and the supervision of job seekers in activities involving Vulnerable People. Section 3.4 of this Handbook refers to Supervision, and Section 9.8 refers to Police Checks and Working with Vulnerable People.

Supporting **school attendance** in Work for the Dole

Developing routines conducive to and reflective of work like behaviours, in parents of school age children is integral to a seamless transition into employment. The task of preparing children for their school day and conducting the school drop off is part of this work-like routine.

There may be opportunities to establish Work for the Dole activities that support increasing school attendance. Some examples are:

- *Walking school bus – a group activity set up by the provider and appropriately supervised to help local children travel safely to school via a walking group.*
- *Driving a school bus – some job seekers may be suited to undertaking this role, which could support current school bus arrangements, particularly where there may be a shortage of volunteers for this job.*
- *Supervision of children on the school bus to and from school.*
- *After school activities – the provider could explore setting up after school activities in conjunction with the school, that help children complete their homework or participate in other after school activities.*

Activities such as those listed above may be listed as a compulsory activity in a job seeker's Job Plan. However, it is important to note that taking your own child to and from school cannot be a compulsory activity in a job seeker's Job Plan. If job seekers with school aged children volunteer to include taking their own children to school as part of meeting their mutual obligation requirements; this can be coded in the Job Plan as a voluntary activity.

Risk Assessments

Providers must ensure a risk assessment has been conducted, either by them, a subcontractor or a host before placing eligible job seekers into Work for the Dole activities. It is the responsibility of the provider to ensure that the Work for the Dole activity is safe and complies with all relevant laws. Risk assessments should be reviewed and updated regularly (every 6-12 months) and more often if circumstances change.

Evidence of completed risk assessments must be provided to PM&C if requested. A Risk Assessment template is available on the Provider Portal (see *CDP Risk Assessment (Activity) Template*) or providers may choose to use their own template. Whichever template is used, providers are responsible for ensuring that the risk assessment analyses the possible risks associated with the Work for the Dole activity, assesses the likelihood and consequences of those risks and develops strategies to eliminate or sufficiently minimise those risks, so that the provider can be satisfied that it can ensure that the activity is safe and complies with all laws.

Further information about managing risk is detailed in section 9.9 Managing Risk.

The **Remote Projects in a Box** is a suite of resources that can assist providers to establish or expand current activities to become Work for the Dole activities. The resources help providers design and develop activities. Each box focuses on a category of work-like experiences designed to build a job seeker's skills and employability. The resources are primarily intended as a guide and activities can be varied and tailored to local circumstances and the needs of job seekers.

For further guidance on the kinds of activities that might be delivered, see *Remote Projects in a Box* on the Provider Portal secure site.

Building Attendance through a Positive Job Seeker Experience

Job seekers are more likely to attend a well-designed activity that taps into their aspirations and community goals. Good attendance not only improves job seekers' skills and employability, it also reduces the need for providers to use the Job Seeker Compliance Framework (see section 7.8) and helps meet provider compliance requirements (see chapter 13).

Quality activities deliver on the CDP intent for job seekers to build their work-like skills and job readiness and contribute to their communities. This works towards the goal of CDP to help job seekers find and retain jobs and reflect community aspirations.

Quality is not just about **what** an activity is – it's also **how** the activity is developed and delivered.

Below are some examples of strategies providers have used to help build attendance at activities:

- 
- Empowering** Involving job seekers in the design of activities. This could include offering choices and working with communities to develop local tailored solutions. For example, taking a survey of what activities job seekers are interested in; training job seekers so that they can be a back-up supervisor; and having good referrals to local support services that can help remove or reduce barriers for job seekers getting involved in activities.
 - Positive** Helping job seekers see the benefits of an activity – for themselves and their community. Senior community members can talk to job seekers about how their activity will benefit the community. Having a range of activities for job seekers to choose from helps to meet individual interests and builds experience. A catalogue of activities can be used to easily show job seekers what is available and what they can expect to learn.
 - Practical** Ensure all job seekers complete an activity induction. Having some simple practices to help communicate responsibilities and expectations to job seekers such as a 'toolbox' meeting at the start of each day outlining what's coming up next and reminding job seekers of their mutual obligation responsibilities. Helping job seekers to buddy up and encourage each other to attend activities or organising a pick up run in the mornings.
 - Personal** Building on the skills of individual job seekers and fostering positive relationships, including with supervisors and other role models. Good supervisors engage with and value the contribution of individuals and influence attendance as a result. Providers can support supervisors through training and development; buddying; and seek community input in the selection of supervisors.

Partnerships Using partnerships to attract additional resources such as materials, the use of premises, or supervisors. Partnership organisations could include universities; regional councils; local Indigenous organisations; schools; local football clubs; Greening Australia; art centres; community stores; and many more.

Pathway Making clear linkages between activities and opportunities for future employment, for example, developing skills in personal care, assistance in readiness for the roll out of projects in the community, such as construction projects or taking up hosted placements in a child care centre or arts centre that may have paid positions in the future.

Examples of activities that have been run under CDP are in the table below. If providers need assistance in planning activities they should contact the PM&C Network for assistance.



Example Work for the Dole activities

Examples of activities using arts and media:

- *Using multimedia to produce cultural stories and community messages.*
- *Sewing group learning clothing production.*
- *Creating arts and crafts stocks for exhibition.*

Examples of activities that can lead to business or economic development (see Chapter 4 – Activities and Economic Development):

- *Collection, cleaning and packaging of bait fish for sale.*
- *Collection, preparation and packaging of local bush plants into cosmetic products.*
- *Aquaculture and nursery design, partnering with an agricultural organisation.*

Examples of activities that support environmental and land management:

- *Recycling old furniture and creating pallet furniture for sale.*
- *Gardening and general maintenance, in partnership with the local shire.*
- *Collection and cutting of fire wood for the elderly and disabled.*
- *Mustering and fencing.*

Examples of activities supporting hospitality and tourism:

- *Developing skills in kitchen operations, food hygiene, coffee making, preparation of meals, ordering and serving in a commercial kitchen.*

Examples of activities that support housing, construction, infrastructure and maintenance:

- *Upgrading a community sporting complex, including general labouring, concreting, design and landscaping, earthmoving and painting and preparation.*
- *Fencing to contain livestock and control feral animals.*
- *Repairing play equipment and upgrading a bike track.*
- *Auto repairs and customer service, hosted by a local auto repair business.*

Examples of activities to grow a provider's pool of supervisors and mentors:

- *Leading a work team, setting goals, managing stress.*
- *Maintaining good relationships with clients, time management and administration tasks.*
- *Language, literacy and numeracy.*
- *Workplace expectations and workplace culture.*
- *Managing workplace conflict.*
- *Maintaining a safe workplace.*
- *Technical Skills.*
- *Mentoring and coaching skills.*
- *Addressing issues impacting job seeker attendance at work or an activity*

Examples of activities that support school attendance:

- *Helping out in the school canteen.*
- *Supporting children with language and culture.*
- *Support school holiday or after school activities.*

Examples of activities that support community safety:

- *Maintaining community meeting places.*
- *Women's and men's groups and shelters.*
- *Animal control.*

Example Work for the Dole activities - continued

Examples of activities that support culture:

- Cultural heritage preservation e.g. cultural site.
- Language preservation.

Examples of activities that support healthy living:

- Health and nutrition classes, food preparation for diabetics and other special needs.
- Assistance for the elderly and disabled.
- Assistance to community members to obtain proof of identity .
- Providing support to deliver sports and recreation activities.
- Health interventions and harm minimisation initiatives.
- Money management classes, including information on internet banking, superannuation and insurance.
- Building in personal development discussions at the start of the day or before lunch breaks in any activity.

Setting Up and Managing Work for the Dole Activities

Providers should give consideration to the Guidelines and consult with communities when establishing Work for the Dole activities.

Activities must enable job seekers to meet their mutual obligations outlined in their Job Plan and provide a daily routine and work-like experience. Providers must place job seekers in activities and monitor and support them to attend.

Activities can be established by providers or under Host arrangements within the Region. Hosts can include employers, all government organisations (Commonwealth, state or territory and local government levels) and non-government organisations.

Developing Training as a Work for the Dole Activity

Providers can include accredited and non-accredited, non-vocational and vocational training as part of a Work for the Dole activity.

A job seeker who is participating in an approved full-time short course, included as a compulsory activity in their Job Plan, will still be required to look for and accept work, but not where it conflicts with the contact hours of the course or if it would prevent them from completing the course.

Providers should only approve a full-time education or training course if:

- they include it as a compulsory item in a job seeker's Job Plan, and
- the course is less than 12 months duration, and
 - completing the course is likely to lead to an employment outcome for the job seeker,
 - there is little chance of the job seeker finding employment with their existing skills, or
 - the course will lead to qualifications in an identified area of skills shortage (see: <https://www.employment.gov.au/skill-shortages>).

Any training provided as a Work for the Dole activity must allow or assist the job seeker to participate in a Work for the Dole activity or directly meet the needs of an employer.

Where training is required for participation in a Work for the Dole activity, it should involve the job seeker learning skills and knowledge they need in order to take part in a particular activity. For example, the job seeker undertakes training in a task so they can participate safely in their activity and meet workplace health and safety requirements, e.g. safe handling of certain materials. Another example could be a job seeker obtaining their forklift licence in order to undertake an activity that requires this accredited skill.

Training that meets the needs of an employer would primarily be preparing the job seeker for current employment opportunities available in their region. However, it could also mean getting job seekers ready for upcoming opportunities in their local labour market, such as construction projects due to start in the near future that requires construction workers. The provider may assist interested job seekers to take part in training that prepares them to compete for the new jobs, such as industry safety training or construction related skills. Training may also be appropriate where a job seeker is interested in taking up employment in another region or a non-remote area, and the provider assists them prepare for this move by helping them access relevant training.

Job seekers may also undertake training in foundation or basic work skills, such as obtaining a driver's licence, or increasing their language, literacy and numeracy skills. Such foundation training prepares job seekers both for Work for the Dole activities and possible employment opportunities by making them more job ready.

Examples of Work for the Dole Activity Training	
Foundation and Basic Work Skills (Pre-Vocational Training)	Vocational Training that must directly meet the needs of an Employer
<ul style="list-style-type: none"> • English, language, literacy and numeracy • Driver's licence • Personal, health and household management • Occupational health and safety 	<ul style="list-style-type: none"> • Environmental and land management • Administration and bookkeeping • Computing and information technology • Child care • Social work and counselling • Construction • Health and education • Hospitality and tourism • Retail and business management • Pre-apprenticeships training linked to the needs of an employer • Local government services

Case Study – Training and Work for the Dole Activities

Rick is engaged in a Work for the Dole activity up to 25 hours per week with the local ranger programme. Rick needs a driver's licence to be able to fully participate, as well as activity specific training from time to time. Because Rick's training forms part of the ranger activity he attends a driver instruction course, and a weed control course to make up his 25 hours for the first few weeks of the activity. The provider has structured these activities in a way that ensures Rick has a work-like daily routine, five hours each day on Monday to Friday.

3.3 Criteria for Participation in Work for the Dole and Special Circumstances

To be required to do Work for the Dole, job seekers must meet all of the following criteria:

- Be 18-49 years of age;
- Receive the full rate of Income Support;
- Not be exempt from mutual obligation requirements; and
- Not have an illness, injury or disability that would be aggravated by the work conditions.

Work for the Dole activities are the principal activities that will build employable skills, and assist job seekers to transition from welfare to work. Job seekers who are on a part-rate of Income Support may volunteer to participate in Work for the Dole, but cannot be required to do so.

To fulfil their mutual obligation, job seekers can attend one or more Work for the Dole activities, five days a week up to 25 hours, depending on their assessed capacity to work.

They may participate alongside other job seekers:

- Who meet the above criteria for participation in Work for the Dole activities; or
- Who don't meet the above criteria but choose to participate in Work for the Dole activities.

Approved Programme of Work Supplement for Job Seekers

Job seekers participating in Work for the Dole are paid a supplement of \$20.80 per fortnight to assist them to meet the additional costs of participation. The supplement is taxable, but is exempt from the income test.

The supplement is not paid on a pro-rata basis. The full payment is made for the fortnights in which the activity begins and ends, regardless of the actual number of participation hours completed in those fortnights. If a job seeker ends participation in Work for the Dole without good reason, the supplement will cease to be paid from the next payday.

Work for the Dole Activity Scheduling

Providers should deliver a mix of activities that set a daily routine for job seekers across a five day, Monday to Friday week. However, there are some special circumstances where a Work for the Dole activity which may add value to community or increase a job seeker's employability, cannot practically be run over a five day period and/or during business hours. Some examples include intensive cattle mustering activity or a community arts festival. Alternatively, an activity may occur regularly after business hours, for example, helping out at a weekly community youth event in the evening.

Providers should submit a proposal to PM&C seeking approval for the job seeker to meet Work for the Dole requirement through a more flexible arrangement, i.e. less than a five days week and/or outside business hours. The activity should not involve a subsequent long period of inactivity for job seekers.

The proposal should include:

- ✓ The hours the project will run and the number of days per week
- ✓ Reasons why the Work for the Dole activity cannot be conducted in normal working hours and why the proposed times are necessary

- ✓ How the project enables a job seeker to meet their continuous mutual obligation requirements while they build skills and develop work-like behaviours
- ✓ How the project contributes to an employment pathway for the job seeker
- ✓ Any additional risks to health and safety imposed from working longer hours or outside normal business hours and how these risks have been considered and mitigated
- ✓ Evidence the activity meets State and Federal legislative and occupational health and safety requirements, such as appropriate breaks and meal times
- ✓ Supervisory arrangements, especially outside of business hours
- ✓ Arrangements to ensure that the project does not impact on other priorities like school attendance or community safety
- ✓ The proportion of a job seeker's Job Plan that include outside business hours participation on a regular basis.

If the proposal is approved by PM&C, job seekers undertaking the activity are able to meet their mutual obligation requirements for a fortnight (up to 50 hours) flexibly within the fortnight and/or outside business hours. For example, if a job seeker is undertaking a mustering activity, they may do 15 hours in the first week and the remaining 35 hours in the second week. Or an activity may involve a job seeker attending a community youth activity held in the evening once each week. The time spent at that activity can be included as part of their Work for the Dole hours. If the job seeker is required to do Work for the Dole, once they agree to the arrangements in their Job Plan it becomes a compellable activity. The provider should use the job seeker compliance framework to manage their attendance in this activity. For job seekers without a Work for the Dole requirement, this activity remains a voluntary activity.

Where there is a clear need, a provider may seek the approval of PM&C for the majority of a job seeker's 25 hour a week Work for the Dole requirement to be performed in a support service, such as drug and alcohol rehabilitation, or counselling for the job seeker. In these situations, the provider will be required to monitor and confirm attendance in the support service.

Under 18 years of age

Providers are required to deliver Basic Services to job seekers under 18 years. Where appropriate, providers should encourage job seekers under 18 to re-engage in school or other education (including vocational training). Providers are required to ensure job seekers under 18 are able to meet their mutual obligation requirements through a combination of approved activities.

Job seekers under 18 are not required to participate in Work for the Dole, but may choose to participate on a voluntary basis where the provider determines that it is the most appropriate activity for them. In placing job seekers under 18 into Work for the Dole, providers should apply rigorous processes and checks to ensure that these participants are able to undertake Work for the Dole activities in a safe environment.

Early School Leavers (ESLs)

An Early School Leaver (ESL) is a person who:

- a) is less than 22 years old, and
- b) has not completed Year 12 or an equivalent level of education, and
- c) receives Youth Allowance (other).

Providers should encourage ESLs to re-engage in education and/or training, to obtain educational qualifications and skills before they are required to look for work. Providers should focus on assisting job seekers to complete school or a year 12 equivalent qualification wherever possible.

ESLs under 18 are not required to participate in Work for the Dole, but may choose to participate on a voluntary basis. Providers are required to ensure job seekers under 18 are able to meet their mutual obligation requirements through a combination of approved activities, with a focus on re-engagement in school or other education wherever possible.

Providers **must not** include Job Search requirements in the Job Plans of ESLs who are in full-time education/training, or who are undertaking a combination of part-time education/training and part-time work for 25 hours per week (15 hours per week for Principal Carer Parents or those with Partial Capacity to Work of 15-29 hours per week).

However, Job Search **can and should** be included as a compulsory item in the Job Plans of all ESLs who are not in the circumstances outlined above.

To assist ESLs to re-engage, providers should consider:

- liaising with the Remote School Attendance Strategy (where available), local education and training institutions, regional or district state education officials, youth services, and DHS to develop an agreed approach locally for new youth referrals – this may include alternative formats provided by vocational education providers, including any specific arrangements made by schools to support the re-integration of disconnected youth;
- check if there is a “transition support unit” servicing the area (such as those used in North Queensland and currently being developed in the Northern Territory);
- consider opportunities for participants and their families to attend visits from boarding school staff (local schools should know when these occur);
- contact the Career Employment Australia Indigenous Community Facilitator/ Career Pathways Adviser in their area (see www.ceainc.org.au);
- promote vocational education and training in school opportunities;
- develop a Job Plan focussed on reconnecting ESLs to education or training institutions;
- addressing barriers to participating in education including assisting with, for example:
 - mentoring support;
 - assistance for literacy and numeracy;
 - transport costs.

Education and training authorities regularly review their service offering so it is important to keep in regular contact with schools, training providers and regional/ district directors of education. However, where a return to school or commencement in training is not possible in the short term due to remoteness or other barriers, ESLs should be engaged in part-time education/training in combination with other approved activities to help them address barriers to re-engagement in education/training or work, and to meet their mutual obligation requirements.

These activities should focus on work preparation and foundational skills (LLN, obtaining a driver’s licence). When there are no opportunities available for the job seeker to return to school or gain additional education/training, the provider will be required to ensure the job seeker meets their mutual obligation requirements through approved activities.

Over 49 years of age

While job seekers over 49 years cannot be compelled to participate in Work for the Dole, they may still have mutual obligations. Providers must deliver Basic Services to job seekers over 49, and make available various activity options for them to meet their mutual obligations. Job seekers over 49 may volunteer to participate in Work for the Dole as a way of meeting their mutual obligation.

For a summary of the mutual obligation requirements for all cohorts of CDP Job Seekers, refer to the table below.

Job Seekers with a Partial Capacity to Work

Some job seekers may have vocational or non-vocational issues that prevent them from participating at a higher capacity and may be assessed as having Partial Capacity to Work (PCW) or a Temporary Reduced Work Capacity (TRWC). Assessed work capacity is identified by an Employment Services Assessment (ESAt). Where there is no ESAt, the Job Seeker Classification Instrument (JSCI) may also help identify personal issues that may affect a job seeker's employability. Refer to the *CDP Assessments User Guide* for more information.

The provider must review the job seeker's identified barriers or personal issues and determine activities that will best help the job seeker address these issues while ensuring they meet their fortnightly mutual obligation requirements.

The CDP IT system will identify job seekers with a PCW on their Participation Profile screen.

Principal Carer Parents

Principal Carer Parents (PCPs) also have part-time mutual obligation requirements once the youngest child in their care turns six years of age. Providers must consider a PCP's family and caring responsibilities, including the availability of child care, when creating their Job Plan.

PCPs do not have mutual obligation requirements during the fortnight of the Christmas Public Holidays. PCPs must continue to meet their mutual obligation requirements at all other times and during school holidays. However, providers must consider whether the PCP can access appropriate care and supervision for their child during this time.

If the PCP is required to undertake an activity but is unable to obtain suitable child care they will have a Valid or Reasonable Excuse to not undertake that activity. For more information on mutual obligations requirements and exemptions for parents please refer to the [Guide to Social Security Law](#).

Summary of Mutual Obligation Requirements for CDP Job Seeker Cohorts

All Eligible Job Seekers must be provided Basic Services as a minimum level of service

Under 18 years old	18 -49 years old eligible for Work for the Dole	18 -49 years old ineligible for Work for the Dole	50 -59 years old	60 years and over
<ul style="list-style-type: none"> • Monthly Appointments. • Looking for a job as agreed with the provider – Job Search. • May choose to participate in Work for the Dole activities on a voluntary basis. • They may undertake other suitable activities, as appropriate. • They are generally required to participate in Full-Time Study, Training or an Education Programme or part-time education or training in combination with other suitable activities for at least 25 hours per week until they attain Year 12 or an equivalent qualification. 	<ul style="list-style-type: none"> • Monthly Appointments. • Looking for a job as agreed with the provider – Job Search. • 25 hours per week in Work for the Dole activities, or up to their assessed capacity. • May participate in other suitable activities <u>in addition to</u> Work for the Dole to meet their Mutual Obligation Requirements. 	<ul style="list-style-type: none"> • Monthly Appointments. • Looking for a job as agreed with the provider – Job Search. • May choose to participate in Work for the Dole activities on a voluntary basis, up to their assessed capacity. • May undertake other suitable activities, as appropriate. 	<ul style="list-style-type: none"> • Monthly Appointments. • Looking for a job as agreed with the provider – Job Search. • May choose to participate in Work for the Dole activities, up to their assessed capacity*. • They must participate in other suitable activities, as appropriate. 	<ul style="list-style-type: none"> • Monthly Appointments. • Job seekers aged 60 years and over may choose to participate in Work for the Dole activities or other suitable activities on a voluntary basis as appropriate.

- Suitable activities to meet Mutual Obligation Requirements are outlined in Section 7.8 of this Handbook.
 - Principal Carer Parents (PCPs) should participate in activities of at least 30 hours per fortnight (and as appropriate, Job Search). There can only be one PCP per family.
 - Job Seekers with a Partial Capacity to Work (PCW) or a Temporary Reduced Work Capacity should participate in activities of at least the minimum hours of their assessed capacity (and as appropriate, Job Search).
 - Attending provider appointments and completing Job Search requirements does not count towards the job seeker’s required Work for the Dole hours.
 - Job seekers aged 55 years and over have Mutual Obligations of 30 hours per fortnight.
- * If job seekers aged 50-59 volunteer for Work for the Dole and are on full rate of income support, this must be a compulsory activity in their Job Plan.
- * Job Seekers with a PCW or a Temporary Reduced Work Capacity with an assessed capacity to work 14 hours a week or under can meet their mutual obligation requirements by attending a quarterly interview with DHS to discuss their participation.

Time off or breaks in Work for the Dole Activities

In most cases, job seekers receiving income support payments have mutual obligation requirements where they must show that they are actively looking for work and are participating in a range of activities that will help them into employment. Work for the Dole activities are the principal activity that offer all job seekers valuable work-like skills while contributing to community and should be offered all year round in CDP.

There will be times when a job seeker will be permitted to have a break (or time off) from participating in a Work for the Dole activity.

'Time off' only applies to job seekers required to participate in Work for the Dole, not those job seekers who are participating in Work for the Dole voluntarily or who are only receiving Basic Services. 'Time off' does not give the job seeker an exemption from meeting their mutual obligations - it only gives them a break from participating in Work for the Dole.

The job seeker will still be required to meet their mutual obligations and the provider will be required to deliver Basic Services during the period of 'time off' from Work for the Dole. This means that the job seeker will still be required to attend appointments with their provider, complete job search requirements if applicable, and other activities as required. The provider will receive the Basic Payment for the period of 'time off'.

During 'time off', providers must update the job seeker's Job Plan with other activities that the job seeker would need to undertake to meet their mutual obligation requirements. Work for the Dole should be removed from the Job Plan for the period of 'time off' – this means removing the WE12 Work for the Dole code from the Job Plan. Providers must then enter a free-text activity in the Job Plan and enter the code TOWD for the period of approved 'time off'. This will enable the CDP IT System to pay the provider the Basic Payment for the job seeker for that period. Refer to the CDP Guidelines Toolkit – Service Payments for more information on payments during 'time off'.

Providers should consider the individual personal circumstance of a job seeker before they agree to offer other activities for the job seeker, for a set period. This may be necessary where the individual has caring responsibilities during school holidays or during normal business shut-down periods and public holidays, for example over Christmas or Easter.

There may also be instances where the provider determines that the job seeker's personal situation should be referred to Department of Human Services for a review of their mutual obligations.

The 'time off' from Work for the Dole activities should not exceed six weeks over a 12 month period (calendar year) without approval from PM&C. Providers should carefully consider a job seekers' circumstances when agreeing to 'time off'. This includes consideration of the job seeker's assessed capacity to work, age, skills and experience, the length of travel required to undertake requirements, family and caring responsibilities, cultural factors, vulnerabilities and history of complying with the mutual obligation requirements.

At the end of the permitted 'time off', the job seeker's Job Plan must be revised to again include the job seeker's requirement to participate in Work for the Dole. Note that Job Plans can be negotiated and approved online, so that an additional appointment may not be necessary.

When providers would like to approve additional 'time off' beyond the allowed 6 weeks, they should submit a recommendation and approval request to their PM&C Regional Manager. The request should include a summary of the relevant job seekers circumstances and outline their

recommendation of what is considered best for their ongoing participation and engagement in Work for the Dole and CDP.

Cultural Business

There are times in some remote communities where job seekers may need a break in activities to participate in Indigenous cultural business. Indigenous cultural business relates to the cultural practices of Indigenous Australians.

Job seekers may request an exemption from meeting their mutual obligation requirements for a period due to their participation in cultural business. Exemptions can only be granted by DHS. The period of exemption will be limited to what is required in individual circumstances. If the length of cultural business cannot be determined, a short initial period of exemption may be applied, e.g. two weeks, and then extended if further information is obtained.

CDP providers should be actively engaged with local Indigenous community members and DHS in their regions to ensure that they are aware of when cultural business is happening and who will be involved. Awareness of cultural business within their region may allow providers to plan and establish Work for the Dole activities to support cultural business when appropriate.

If job seekers are not granted an exemption by DHS, they will be expected to meet their mutual obligation requirements through participation in CDP and Work for the Dole, if appropriate. Providers will be expected to utilise the National Job Seeker Compliance Framework to manage non-attendance by job seekers who are participating in cultural business without an exemption from DHS.

Refer to the *CDP Advice on Managing Leave for Cultural Business* on the Provider Portal for more information on CDP job seekers undertaking cultural business. Further information on cultural business and other exemptions in special circumstances (e.g. caring responsibilities) can be found at <http://guides.dss.gov.au/guide-social-security-law/3/2/11/40>.

3.4 Supervision

In all Work for the Dole activities a provider must ensure that supervision is appropriate, adequate, and consistent with the General Terms and Conditions of the CDP Funding Agreement.

Where Vulnerable People are involved a provider must ensure that supervision is continuous. That is, the job seeker must be in the line of sight of the supervisor at all times.

Workplace health and safety requirements apply for all Work for the Dole activities. It is also important that providers consider appropriate levels of skill/knowledge when engaging supervisors, for example they may assist them to obtain first aid certification if required.

The individual needs of job seekers must be considered, such as the needs of Aboriginal or Torres Strait Islander persons, principal carers, persons with a disability, or people from a cultural or linguistically diverse background.

Providers should ensure that appropriate training is available for nominated supervisors and the necessary checks are undertaken (including police checks and, where relevant, working with children or Vulnerable People checks).

Supervisors are considered employees/or subcontractors of the provider and National Employment Standards (NES) awards apply.

Providers must ensure that supervisor absences do not disrupt or adversely affect the delivery of Work for the Dole activities.

Supervisors play a critical role in supporting the provider to monitor and actively manage job seeker attendance. It is important that supervisors undertake daily assessment of attendance and support the providers to monitor and report on job seeker compliance.

3.5 Delivering CDP activities in small communities

It is recognised there are challenges and difficulties for providers servicing communities, outstations, and homelands where ten or fewer job seekers reside and where the dispersed or isolated nature of the region requires a different and tailored approach to delivering CDP activities. Providers should aim to use Work for the Dole funding to deliver quality activities that follow the same principles as for larger communities in providing job seekers with relevant skills and experiences that meet their needs and the needs of the community.

All Work for the Dole activities should provide daily work routines with a reasonable number of hours of activity each day over a five day week, with clear tasks and responsibilities that work towards the completion of milestones.

As a minimum, providers will make monthly visits to small communities to engage with job seekers and the community and ensure that Work for the Dole activities are running smoothly with milestones being achieved. If providers have concerns that milestones are not being met they should attempt to visit at unscheduled times and/or more frequently.

Community engagement

Engaging with the community in designing the activities is a fundamental first step. Providers should determine what is currently in place and has worked in the past, what community needs are, who would be willing to assist with activities, and in what capacity. Providers should also consider potential costs and determine who will pay for what. The PM&C Network can assist to facilitate these conversations if required.

A Positive Job Seeker Experience

Job seekers in small communities must be given opportunities to attend activities to fulfil their mutual obligation requirements and should be offered activities that will move them along a pathway to build skills and experience, and provide set routines. Providers will need to work with the community and job seekers to manage expectations and develop innovative activities that make the most of local opportunities, including some of the ideas outlined below.

Partnering

There are many programmes funded by local, state and Commonwealth government in remote Australia that could provide beneficial partnering arrangements. Providers should identify other programmes in their regions and explore if working together and sharing resources could benefit all parties as well as job seekers and communities. For example, partnering with an organisation funded to deliver a school garden through the Stronger Communities for Children ([SCFC](#)) could allow for the pooling of funds to achieve a better outcome and may also provide host placement opportunities for job seekers. It also broadens the range of work-like experiences job seekers can access in very remote or small communities.

Packaging up activities

In small communities providers may consider packaging up a range of different activities for job seekers to make up their required mutual obligation hours each fortnight. For example, a job seeker may attend a community beautification and maintenance activity for two days a week, an activity on building tourism opportunities for two days, and spend one day per week at a fencing activity.

Supervision

Although not obligatory, for activities with larger numbers of job seekers providers should consider whether it would be appropriate to appoint a job seeker or community member as a part-time paid supervisor.

In regions where there are clusters of small communities reasonably close together providers are strongly encouraged to employ a local job seeker to take on the role of a paid supervisor and travel between the communities, spending at least a small amount of time in each one over the working week.

In more isolated and standalone communities providers should consider nominating, or asking the community to nominate, someone with the ability and social standing to take a lead role and record job seeker attendance in activities. If this is not feasible providers must ensure job seekers are aware of their obligations to attend activities unsupervised and how activity milestones will be monitored and compliance action applied if needed.

Providers must submit a proposal to PM&C for each activity in small communities that will not have a full time supervisor. Proposals will be considered on a case by case basis.

Safety

If activities will be delivered with limited or no supervision providers must take into consideration the safety of the job seekers, paying particular attention to potential risks and how they can be mitigated. As for all activities a thorough risk assessment must be completed and job seekers put through an induction before they commence to ensure they are aware of their day to day safety requirements. Providers must follow the same principles as outlined in section 9.9 Managing Risk and section 3.2 Delivery – risk assessments.

Activity Approval Process

Activity proposals should provide clear details of the Work for the Dole activity, including timeframes, number of participants, milestones, outcomes and how the project will provide a sufficient level of activity for job seekers to meet their mutual obligation requirements over a determined period. The proposal should also outline the costs of the project and the level of investment that will be made to the homeland or community. A proposal template is available on the Provider Portal but providers may choose to use their own version.

If PM&C approves the activity, the provider is paid Work for the Dole payments for job seekers undertaking the activity to cover the cost of set up and supplies as long as they inspect the Work for the Dole activity regularly (no less than monthly) and are able to confirm that work has occurred and that job seekers have been engaged in the activities. If providers are concerned about their ability to service small communities with ten or fewer job seekers they can speak further with their local PM&C Regional Manager.

Examples of activities

Through strong community engagement, providers will understand the community's needs, strengths and opportunities. Below are a few ideas to prompt thinking.

Community beautification and maintenance

There are many activities that would benefit the community such as erecting shade structures, landscaping, regeneration of community areas, creating play areas for children, creating edible gardens and the renovation of current structures.

Cultural and/or tourism

There may be scope for job seekers to contribute to the community by maintaining important cultural sites, which could be expanded to opening some areas to passing tourists and providing information on site or guided tours etc.

Fencing and feral animal control

Communities may identify the need for fences in certain areas such as around children's play areas, schools or community meeting places. Fences could also be required for edible gardens and to control feral animals in the area. These types of activities may link into the community beautification and maintenance projects mentioned above.

Domestic violence awareness

Providers should consider providing a whole package of assistance in small communities. For example, they may get the whole community on board to undertake domestic violence awareness. This may be offered one day a week with the job seekers undertaking Work for the Dole activities to fulfil the rest of their mutual obligations over the remaining four days.

These are just a few examples. If providers need assistance in planning activities they should contact the PM&C Network for assistance.

Providers must submit proposals for activities in small communities to PM&C for approval. These should outline the activity, timeframes, costs, milestones and outcomes that will be achieved. Details should also be provided on any partnership arrangements that the provider intends to enter into.

Recording Attendance

Where there is a supervisor or a nominee appointed they will record attendance in activity timesheets daily, but if this is not the case then job seekers will be expected to record their own attendance in timesheets each day. Providers can choose from the following two options when recording attendance in the Activity Diary, but whichever option is chosen, providers should note how much progress has been achieved against the expected milestones to ensure attendance is being accurately recorded as part of the monthly site visits.

Option 1:

The provider should record attendance in the Activity Diary when timesheets are received, preferably on a weekly or fortnightly basis via the Supervisor App. However if this is not practical timesheets may be collected monthly when visits are made to check milestones, but providers should take the

payment calculation date into consideration to ensure that attendance is entered prior to this date so they receive the correct outcome payments.

Option 2:

The provider should record attendance in the Activity Diary on a daily basis as 'Attended' unless made aware that non-attendance has occurred. Then, when timesheets are received the result is amended (if required) to correctly reflect the attendance information in the timesheets. However, it should be noted that providers must attempt to contact the job seeker at least once before recording instances of non-attendance in the Activity Diary and taking compliance action.

Where possible, the provider should use the Supervisor App to record attendance in activities. This could be provided to the nominee or supervisor (if there is one) and attendance recorded when an area of connectivity is found as often as practicable.

Compliance Action

When a provider becomes aware of job seeker non-attendance at an activity, they must attempt to contact the job seeker to discuss the non-attendance and then consider whether to take compliance action. If they decide to do so they must report the incident to DHS on the same business day that they make this decision. The timeframe for doing this is:

- For non-attendance at an activity – within 10 business days of the event

For activities in small communities this means that if job seekers are absent without a valid excuse on the day the provider visits the activity they must make a decision whether to take compliance action within 10 business days, but must take action on the day of making the decision.

The provider could also take compliance action for non-attendance that has occurred up to 10 days prior to their visit, providing they have a reliable witness that can verify the non-attendance. For example, verification may be provided by a nominated job seeker or community member who is recording attendance on a time sheet each day. Again, the provider must attempt to contact the job seeker at least once to discuss the non-attendance, prior to taking compliance action. In addition, it would be best practice for providers to contact job seekers more regularly if possible to discuss attendance, rather than waiting for time sheets or relying solely on feedback from those nominated to record attendance.

Case Study

A provider would like to deliver a Work for the Dole activity that involves building an outdoor community meeting area and cooking facilities in the homeland. The provider would need to demonstrate how the Work for the Dole activity would provide job seekers with work-like skills and benefit the community. They would need to outline the tools and other building supplies required, and timeframes and milestones for the completion of the activity and how this meets the job seekers mutual obligation requirements.

The provider will need to demonstrate that an appropriate and reasonable amount of the Work for the Dole funding will be invested in materials and resources. The provider will also need to demonstrate that the project offers sufficient hours of work to meet the job seekers mutual obligations. If there are 10 job seekers in the community and each of the 10 job seekers had mutual obligations of 15 hours per week, the project should offer 150 man hours of activity each week.

As supervision may not be provided on a daily basis, the provider will need to set project milestones that can be measured on visits to the homeland. These visits must occur regularly, no less than once a month. During these visits the provider should assess completion against milestones, job seeker safety, and ensure the ongoing appropriateness of the project. Providers may also consider it appropriate to appoint a job seeker or community member as a nominated person to record attendance or if numbers warrant it, as a part-time paid supervisor to manage the activity. Providers are responsible for the costs of providing supervision and Basic Services to the community and will need to allocate resources from their Work for the Dole payment (\$12,450) to cover this.





4. Activities and Economic Development

4.1 Overview

Activities can be used to generate income and support economic development, as well as giving job seekers opportunities to build their skills and contribute to their communities. Activities that generate income can offer job seekers a broader range of work experiences, such as customer service and handling money. Participation in an activity that generates income can also enable job seekers to earn additional income and understand economic opportunities.

Providers must consider the impact of activities on economic development. Activities can contribute to economic development by:

- generating income;
- keeping income in the local economy; and
- creating a pathway for the establishment of new commercial enterprises.

At the same time, providers need to be mindful that Government-funded activities have the potential to adversely affect the viability of existing enterprises and local employment. This can occur when activities sell goods and services below market rates.

Providers must ensure that activities support economic development and seek approval from PM&C to undertake activities that generate income. This will enable PM&C to ensure that pricing of goods and services from activities, and distribution of activity-generated income supports economic or community development.

What is economic development?

Economic development brings businesses and goods and services into local communities, creating more opportunities for employment and training. As more community-, family- and individually-owned enterprises provide goods and services; there is less reliance on government-funded services and welfare payments.

4.2 Establishing Activities

Providers that have, or are considering establishing, activities that generate income are encouraged to think about how to design the activity to support economic development. For example, charging for goods and services will also make it easier to establish a new enterprise from the activity. Businesses rely on customers spending money on goods and services to pay for wages and cover other costs. A business will not be able to compete with activities that are providing goods and services for free.

Activities that generate income can be used to test what customers want and are willing to pay. They can also be used to develop job seekers' skills and see if they enjoy the work involved in running or working for the potential business.

PM&C encourages providers to generate and distribute income to job seekers as this contributes to economic development. This can increase the amount of money coming in and circulating through the local economy, and increase the purchasing power of local families.

Job seekers are also more likely to want to attend activities that allow them to earn extra income. Providers can also benefit from income-generating Activities. Providers can keep 10 percent of the total income the activity generates. For more on distribution of income see section 4.4 below.

Approving income-generating activities

The PM&C Regional Manager must approve activities that generate income prior to commencement. Providers must seek approval for existing income-generating activities prior to 1 July 2016. Providers are required to fill out the Income Generating Activity Approval Form and submit this to PM&C (available on the Provider Portal).

PM&C will not approve activities that undermine the viability of existing enterprises or reduce employment opportunities. PM&C will review income-generating activities at least once every two years to ensure the activity continues to support economic development. PM&C reserves the right to review income-generating activities more frequently.

When considering whether to approve an activity, PM&C will consider:

- Whether the product or service is already available in the community
Providers should develop activities that meet community needs. Activities should provide goods and services that are not available in the community or only available at high or unaffordable prices.
- Whether the provider will charge a fair market price
Providers cannot undercut existing businesses by selling similar goods and services to the same target market at lower prices than existing suppliers. Providers can charge lower prices to residents who cannot afford goods and services from existing businesses e.g. registered job seekers.
- Whether the activity will affect employment opportunities
Activities must not displace work that would normally be done by paid employees or through labour hire or other businesses. If the client – for example the local government or business – would normally pay for the service, the service should be provided by paid employees. Activities should only provide services such as landscaping, mowing, cleaning, pest control and garbage collection where the client has very limited funds and could not afford to

purchase them at market rates.

- How much income is likely to be generated and how it will be distributed?
Generally, providers can keep up to 10 percent of the gross income an activity generates and must distribute the remaining income to job seekers.

Activities that are likely to generate a significant amount of income should be turned into enterprises and, to encourage this, may be approved for a limited time only.

Activities and competition

Where competition is limited, existing businesses generally charge higher prices. Increased supply of goods and services from an activity can lower prices and make goods and services more affordable for the community. This contributes to economic development. With more goods being sold, existing businesses can usually operate sustainably, even if prices come down. See section 4.3 on pricing.

Case Study – Competition where prices are high

A provider identifies an opportunity to set up a concreting activity in a remote community. There is a lot of demand for concreting work and there is only one concreting business that regularly supplies this service in the community. Because they are the only supplier in the community, the business charges a much higher price than they charge in regional areas.

PM&C approves the activity because they can see that starting a concreting activity will allow more concreting at more reasonable prices and will not reduce employment. While the activity cannot undercut the price of the existing business, the presence of the activity will add competition. The existing supplier will likely still be able to operate sustainably even if they reduce their price. This has the potential to increase economic activity and create new jobs because construction work is more affordable now.

Where prices are already low and existing enterprises are only just able to cover costs, competition from a Government-funded activity could make these enterprises unviable. Providers should not run activities (including activities that provide goods or services free of charge) that take business away from existing enterprises and undermine their viability.

Case Study – Competition in a small market

A provider wants to set up a café as an activity catering to the community at large. There are a few existing cafes in the community, with operating costs that include staff wages, rent and buying supplies.

PM&C does not approve this activity because it could result in the closure of one or more of the existing cafes. This is because there is only a limited customer base and the existing cafes have slim margins. Because much of the provider's costs are paid through CDP, their presence could force existing cafes to lower their prices and be in a position where their business becomes unsustainable.

Activities that provide paid services to councils or businesses for construction, road maintenance, landscaping, pest control, garbage collection or office cleaning work can displace employment. This is because the council or business would normally employ staff or pay a labour hire or other business – rather than the provider – to do the work. For this reason, PM&C is unlikely to approve activities that would normally be done by casual or permanent employees, labour hire firms or other businesses.

Providers are encouraged to establish labour hire businesses (where these businesses do not already operate) to undertake this work. This will ensure that job seekers have access to short term employment wherever possible.

Case Study – Activities and labour hire opportunities

The provider identifies an opportunity to do landscaping work for the council. Each year, the council undertakes some landscaping work but does not have enough money for all the landscaping work they want to do.

PM&C does not approve an income-generating landscaping activity. This is because PM&C wants to make sure that the landscaping activity is not displacing real jobs that the council would normally employ or pay people to complete.

Instead, the provider establishes a labour hire business which can undertake some landscaping work for the council. A number of job seekers are employed through the labour hire business to do this work.

Separately, the provider also sets up a community beautification activity to improve community tidiness. This activity is provided as a community service at no charge. The council does not have funding to pay for this work although it can cover the costs of materials. PM&C does not need to approve this activity as it doesn't generate income.

4.3 Selling at a fair market price

Activities must charge a fair market price for goods and services delivered through the activity. A fair market price is the price other organisations or businesses would charge for similar products. This ensures Government-funded CDP activities do not undercut the price charged by existing businesses.

In establishing an activity that sells products in competition with an existing business, a fair market price should be around the same price that existing businesses charge for similar products. Providers

must not unfairly take advantage of their lower cost base (for example, charging less because the activity's labour comes at no cost to the provider), to cut the existing business out of the market.

Businesses may respond to the establishment of an activity by reducing their prices. Competition will make goods and services more affordable and can increase economic activity.

Providers can charge lower prices if they sell similar products to parts of the community that do not buy goods or services from existing businesses because of unsuitability or unaffordability. Providers can sell goods and services at a price that these community members can afford. This may be lower than the price existing businesses are charging other parts of the community or in town. Note: PM&C considers that councils, businesses and other organisations should pay local businesses market rates for goods and services.

Case Study – Selling at a low but fair price

1) A provider runs an activity that provides curtains for families in the community for a small fee. Although curtains can be purchased in town, the families that need the curtains cannot afford to purchase them.

PM&C approves this activity on the basis that the provider sells curtains at the lower price to families that cannot otherwise afford them. The provider can also sell curtains to the wider community but at the same price as that offered in town.

2) A catering activity makes healthy lunches for CDP participants. The provider charges a small amount to the job seekers. Job seekers could purchase meals from local food carts but they do not sell healthy food. There are shops in town that sell healthy food but they charge prices that are unaffordable for job seekers. PM&C approves this activity as the lunches are to be sold only to job seekers.

The catering activity is very successful. The provider decides to expand the activity and begin producing lunches for sale in town. The provider charges the same price for these lunches as other local cafés and food vendors. Should the activity prove successful over time, the provider would be encouraged to transition it to a commercial business.

4.4 Distributing Activity-Generated Income

Activity generated income is the **gross income** (or revenue) generated by the sale of goods or services. It is **not just the profit** from running the activity (revenue minus the costs of running the activity).

Costs of generating income

In principle, providers cannot retain more than 10 per cent of the income from activities without PM&C approval. Providers already receive Government funding to deliver job seeker activities and should not have a financial incentive to continue running an activity rather than establishing a separate business.

Providers may incur additional costs delivering an activity that generates income, for example to deliver goods to customers or for higher quality materials. To provide an incentive to establish income-generating activities, providers can retain up to 10 per cent of the income the activity generates. This should also cover any additional administration costs associated with keeping records of the distribution of activity generated income.

If the provider wants to retain more than 10 per cent of the activity generated income, the provider must obtain PM&C approval. To do so, the provider will need to demonstrate to the Regional Manager:

- That there are additional costs associated with running it as an income generating activity (rather than as an ordinary activity); and
- That these additional costs are more than 10 per cent of the estimated income.

The provider must keep documentary evidence of these additional costs and provide it to PM&C upon request. Documentary evidence will help support the provider's request to retain more than 10 per cent of the activity generated income. Providers can offer receipts or quotes as evidence when seeking PM&C's approval.

Case Study – When providers can recover more than 10 per cent of activity-generated income

A provider runs an activity that produces tables and chairs from a low quality timber purchased from the local hardware store. Over time, the skill of the job seekers involved in the activity improves. The provider recognises there is an opportunity for the activity to generate income if it sold furniture made from a more expensive hardwood timber. The provider purchases the hardwood and begins selling the furniture to the local community. The provider soon discovers that the cost of purchasing the hardwood is greater than 10 per cent of the income generated from each sale.

The provider approaches the PM&C Regional Manager about retaining 20 per cent of the income generated to cover the additional cost of producing the saleable furniture. The provider presents quotes and receipts of the cost of purchasing the hardwood, which confirms the cost is around 20 per cent of the income generated. The PM&C Regional Manager approves the provider retaining the requested amount.

Distribution of income

To maximise economic development, income from activities must be distributed to job seekers, unless other arrangements have been reached with job seekers and PM&C. Distributing income to job seekers increases the purchasing power of families in the community and helps keep money in the local economy.

Income should be distributed to job seekers involved in the activity, in proportion with their attendance. For example, a job seeker that attends 20 hours in an activity is entitled to receive 20 per cent less activity generated income than someone who attended 25 hours.

Providers are to distribute activity generated income to job seekers at regular intervals, for example in line with their income support payments. Between intervals, providers are to hold activity generated income in trust on behalf of job seekers participating in activities.

Art activities

Different activity generated income rules apply to art-based activities, which are outlined below.

Distribution of income

Income from the sale of art through an art or craft activity must be distributed to the artist and not distributed amongst other job seekers. As with other activities, providers generally cannot retain more than 10 per cent of the sale price of the item. Providers must also adhere to the Indigenous Visual Art Industry Code (which the Indigenous Art Code administers).

Existing art centres and galleries in the community

A provider should avoid running an art activity in competition with existing art centres or galleries in the community. PM&C is unlikely to approve an art activity if it is in competition with an existing art centre or gallery nearby. This is because the presence of the art activity could result in the closure of the other art organisation(s).

PM&C may approve an art activity that supplies job seeker artworks to existing art centres or galleries in the community, such as on a consignment basis. Providers should offer evidence of the agreement with existing art organisations when seeking approval for the activity from PM&C.

Workplace Hosted Placements in art centres (see Chapter 5 for more details on Hosted Placements)

If an art centre already exists within a community, the provider should consider arranging workplace Hosted Placements with the art centre or gallery. As these art centres are commercial in nature, workplace Hosted Placement limits apply to the number of job seekers they can take on. Regional Managers could temporarily approve a higher ratio of Hosted Placements for newly established art centres and galleries to help build the centre.

Any income generated from the sale of artworks produced by the hosted job seekers should be distributed in accordance with the art centre's usual arrangements. For instance, art centres and galleries under the Indigenous Visual Artist Industry Support (IVAIS) programme work on a consignment basis, offering their artists 60 per cent of income from the sale of art. Providers should avoid placing job seekers in an art centre that does not compensate artists for their work.

Income that job seekers receive from an activity is reportable for income support purposes. Providers should inform job seekers that they should report to Centrelink any income received from participating in an activity.

If reportable income is greater than the job seeker's income test threshold, the job seeker may receive a reduced rate of income support. Job seekers not receiving the full rate of income support cannot be compelled to undertake Work for the Dole activities but can volunteer to undertake Work for the Dole as part of meeting their Mutual Obligations. The boxes below provide more information about the current income test thresholds and tax implications for job seekers who receive activity generated income.

The Government has introduced legislation into the Parliament that will reform remote welfare and strengthen compliance arrangements under the CDP. With passage of this legislation, job seekers will be able to earn more income and still receive income support.

Income support and income free areas (thresholds)

Income that job seekers receive through a CDP activity is reportable for income support purposes. Any income a job seeker receives could affect their income support. The income test free area for each payment (the amount of income a person can earn before payments are affected) can be found on the Department of Human Services website.

Jenny, a single mother, and Jamie, a single NewStart Allowance recipient, are two of 10 job seekers who all participate in a sandwich-making activity for their full 25 hours of mutual obligation requirements.

The activity generates around \$2,000 a fortnight selling sandwiches in the community. After the provider takes 10 per cent of the income, each of the 10 job seekers that attended would receive \$180 of the activity generated income each fortnight.

Since Jenny receives Parenting Payment Single and has one child, the activity generated income is below her fortnightly income free area of \$186.60 and she remains on the full payment. Jamie's share of the activity generated income is greater than his NewStart Allowance fortnightly income test free area of \$102 so under the current system he receives a reduced income support payment. This has implications on his obligation to attend activities (see **Distribution of Income** above).

To ensure everyone has a fair opportunity to undertake high income generating activities, providers should consider rotating job seekers who have shown an interest in these activities.

Providers are required to maintain records of the amount of activity generated income collected, how much they retained, and how much was distributed to each job seeker.

Tax implications for job seekers

Job seekers that receive income may need to pay tax. The current tax free threshold is \$18,200 a year. A job seeker's income support and any activity generated income will contribute to their combined annual income. But job seekers on income support should receive tax offsets including the beneficiary tax offset and the low income tax offset. This means job seekers may receive a partial or potentially full tax refund.

Job seekers may agree with their provider to distribute the activity generated income in an alternative way, particularly if the activity generates only a small amount of income. For example, job seekers and the provider may agree to use the funds for community development, such as supporting sporting activities, purchasing play equipment for children or putting on a BBQ.

PM&C must approve the alternative approach to distribution when they approve the activity. If the job seekers and the provider cannot agree on an alternative approach, PM&C can determine an approach to distribute the income. In determining an approach, PM&C will take into account community needs and the potential for economic development.

If an activity has the potential to generate significant income, it should be converted into a business rather than being supported through CDP. If the amount of income to be distributed to job seekers nears or exceeds the minimum hourly wage, the provider should also consider turning the Activity into a business. This ensures job seekers are better off in a job rather than remaining in an Activity.

Generally, if an activity has paid contracts from local businesses or councils (i.e. to mow lawns, clean, clear land, or undertake weed and pest control services), it should also be converted into a business. This work should be undertaken by paid employees, for example through a labour hire business.

PM&C may approve activities that can earn significant income for a limited period only. This will provide a further incentive to convert the activity into a business.

Does payment of activity generated income create an employment relationship?

The activity generated income arrangements set out in this chapter are not intended to create an employment relationship between the provider and job seekers. As such, superannuation and other entitlements should not be triggered by these payments.

Providers are entitled to keep up to 10 per cent of the income to cover legitimate costs of the activity. The remaining income generated by an activity belongs to job seekers. Providers are to set up a separate account and hold this income in trust on behalf of job seekers who participate in the activity between the period when the income is collected and when it is distributed. Providers should aim to distribute activity generated income to job seekers on a fortnightly basis. Any interest earned during that period should be distributed in accordance with PM&C's approved distribution. Note, PM&C can also approve the use of income for community development with the agreement of job seekers.

Case Study – distribution of activity generated income from a market garden activity

A CDP provider runs a market garden activity for 10 local job seekers. The job seekers produce tomatoes, potatoes and lettuce, which the provider sells at a weekend community market.

The provider uses CDP outcome payments to purchase soil, seeds and fertiliser, and also pays a local community supervisor to oversee the activity.

The provider charges the same price as other vegetable producers and makes roughly \$300 each week from the sale of the vegetables. The provider keeps 10 per cent of the earnings (\$30) and distributes the remaining \$270 to the job seekers based on their hours of attendance.

Eight of the 10 job seekers met their full weekly mutual obligations and received \$29.35 each. Two of the job seekers only attend 15 of their weekly 25 hour mutual obligations. Their share comes to \$17.61 each.

Case Study – Art activity supporting a local Art Centre

A provider wants to set up an art and craft activity and sell the artwork of job seekers. There are no existing arts organisations in the local community.

PM&C approves this activity as its presence will not adversely affect other local businesses. In accordance with the activity generated income rules, 10 per cent of the proceeds from the sale of any artwork are retained by the provider, and the remaining 90 per cent is distributed to the artist who produced the artwork.

In the following year, a commercial art gallery plans to establish its own art centre in the community, recognising the talent of the local job seekers. But the art gallery owners are cautious about entering into a community where they may be competing with a provider-run art activity. This is because there is only a small market for arts and craft products from that region.

To alleviate the art gallery owners' concerns the provider offers to exclusively supply the gallery artworks produced in the art activity on a consignment basis. This allows the provider to continue to support job seekers that wish to undertake an art activity. All parties agree to this arrangement including job seekers. The gallery owners are also willing to support a handful of workplace Hosted Placements. PM&C approves the Activity.

Once the commercial art gallery commences operations, they pay each artist 60 per cent of the sale price of their artworks. The gallery retains the remaining 30 per cent of the sale price allowing it to operate on a commercial footing. The provider retains 10 per cent of the income to cover their additional costs. The job seekers are happy with this distribution because the art gallery owners have stronger links into the international art market and can achieve a higher price for their artworks.

Case Study – Native plum picking activity

A provider runs a Native plum picking activity with 10 job seekers during the dry season harvest. The provider sells the native plum, which is high in antioxidants, to an exporter for \$50 a kilo.

Over the season, the job seekers collected around 2,000 kilos of plums. The total income generated came to \$100,000. The provider keeps 10 per cent of the income and distributes the remaining \$90,000 to the 10 job seekers based on their fortnightly attendance over the following 9 month period till the next harvest season. Each job seeker received around \$500 per fortnight over that period. All of the job seekers earned more than their fortnightly income test threshold, experienced a reduction in their income support and as a result did not have compulsory Work for the Dole obligations. The provider expects that most of the job seekers would continue attending the activities and receive the activity generated income.

Upon hearing that the activity generated such a significant level of income, PM&C informed the provider that they would no longer approve the activity for the following harvest season. PM&C encouraged the provider to convert the activity into a business. The provider and PM&C worked together to agree to a timeline and plan for turning the activity into an Indigenous-owned social enterprise. PM&C provided funding to assist the transition into a social enterprise.

4.5 Converting Activities into Businesses or Social Enterprises

Providers are encouraged to convert activities that can generate significant income into sustainable businesses or social enterprises that are separate from the provider's employment services business. Activities that convert into enterprises can:

- provide jobs
- host job seekers
- compete with other businesses
- generate profits for the owners or for reinvestment in the community.

Providers that are inclined to convert an activity into a business should contact their regional manager about obtaining support under the Indigenous Advancement Strategy, which allocates up to \$25 million per year to assist remote Indigenous businesses access start-up funding, business support and mentoring. PM&C's Regional Network will take a proactive approach to identifying activities that could be converted into a business.

Once registered with an Australian Business Number, the business is eligible to claim Employer Incentive funding in the event that job seekers achieve 26 week employment outcomes.

PM&C can also approve a higher number of hosted job seekers for a period of up to two years as they are establishing the separate business (see chapter five on Hosted Placements).

What happens to assets when converting an activity to a business?

For assets purchased using CDP payments (from 1 July 2015 that are non-Participation Account related), no permission is required from PM&C to transfer or sell the asset to a new business. Be aware, however, that the provider will still need to comply with the CDP contract. The provider will need to consider how they will deliver CDP activities without the asset.

For assets purchased with Participation Account (PA) funds, the provider and PM&C will need to agree to arrangements before transferring the asset to a new business.

The Commonwealth may seek fair compensation for the transfer of assets purchased through the PA if they are no longer going to be used in the delivery of remote employment services. When determining whether to seek compensation, PM&C will consider the value and age of the asset, and the employment and other benefits from the new enterprise.

Case Study – Turning a landscaping activity into a business

A provider established a landscaping activity under RJCP and has continued to deliver it under CDP. The provider used a mixture of Participation Account funding and CDP outcome payments to buy the necessary materials and equipment. Participants have become skilled at delivering landscaping services.

The local shire and several private businesses want to contract the provider for landscaping services, including graffiti removal, minor building, beautification, gardening, lawn care and weed management.

As the provider charges for the services delivered, the landscaping function is a labour hire arrangement. PM&C will no longer approve this being delivered as an activity. The provider realises that the service could generate enough income to become a sustainable business that provides a number of real jobs and quality Hosted Placements for job seekers.

The provider receives an Indigenous Enterprise Development grant from PM&C and a loan from IBA to cover the costs of establishing the new business, including setting up business systems and leasing more equipment.

As part of the package of business support, PM&C agree that initially the provider's new business will have 10 Hosted Placements in addition to two staff who will supervise the job seekers. In six months' time, the number of Hosted Placements will go down to five and the business is expected to employ two more ongoing staff to work on paid contracts.

After two years, the new business, Desert Landscapes, employs five permanent staff and regularly hosts up to two job seekers. It also receives Employer Incentive Funding for each job seeker it employs for 26 weeks.

In addition, the provider contracts Desert Landscapes to run a hosted Activity for 10 job seekers during the dry season to undertake unpaid beautification Activities in remote communities. In the past, this Activity would have been managed by the provider directly.

Case Study – supporting job seekers to become sole traders

A CDP provider runs an Activity that develops the furniture-making skills of local job seekers. Some of the job seekers become very skilled at producing high-quality furniture including coffee tables, chairs and bed frames. The provider recognises that these job seekers could begin selling their furniture.

The provider wants to support local economic development but does not have an interest in running a furniture-making business. The provider decides to incubate the best job seekers to become sole traders who sell their own furniture. The provider allows these self-employed job seekers to continue use the provider's tools and facilities for a small fee. The provider also works with a local Indigenous business mentor to support these job seekers with on-call mentoring and back-office business support. To build on initial sales success, the provider changes the focus of the job seeker's structured Activity to developing business skills.



5. Hosted Placements

5.1 Overview

A provider can arrange for a host organisation to deliver Work for the Dole activities on its behalf through a hosted placement.

Hosted placements must be safe and allow job seekers to fulfil their mutual obligations (in RAC1 of the CDP Funding Agreement, these mutual obligations are included in the definition of “Social Security Activity Test Requirements”). Hosted placements are different to subcontracting relationships (see 5.2 *Delivery, Difference between a hosted placement and a subcontracting arrangement* for a further explanation).

Hosted placements can be in a community development activity or a real workplace. In both cases, the job seeker remains on income support.

5.2 Delivery

Host organisations can be not-for-profit organisations, businesses, social enterprises, entities related to the provider, or commonwealth, state, territory or local government agencies. Host organisations can also be located in non-remote areas.

Providers must enter into contractual arrangements with the host organisation to define the hosting details, including the number and duration of placements, supervision of the job seeker and the reporting of attendance to the provider. An optional template is available on the Provider Portal (see *CDP Activity Host Agreement*).

Hosted placements can make up part or all of a job seeker’s mutual obligation requirements. Some employers and community organisations may be willing to provide hosted placements but are unable to do so for five hours per day, across a five day, Monday to Friday week. Providers can submit a proposal to PM&C seeking approval for the job seeker to meet their Work for the Dole requirement through a more flexible arrangement, i.e. more or less than a five days a week and/or outside business hours (see *Work for the Dole Activity Scheduling* in Chapter 3 of these guidelines for details on what the proposal should address).

Regardless of the type of Hosted Placement, CDP providers cannot arrange hosted placements that:

- Replace paid employment

- Involve activities that could bring the job seekers, providers or PM&C into disrepute, for example activities that involve gambling, illegal or high risk activities.

Payments for host organisations

A Host organisation is likely to incur costs, for example costs for materials and on the job training and mentoring. Host organisations may also incur additional supervision costs when hosting job seekers. Host organisations and providers can negotiate a payment to cover these costs.

As a rule of thumb, we recommend providers split the Work for the Dole service fee 50-50 with the organisation that hosts an activity. However, this should depend on a range of factors including:

- Size and type of host organisation
- Hours of attendance per week
- Supervision requirements (including appropriate reporting of attendance to the provider)
- Additional mentoring support requirements
- Complexity of the activity and therefore training or skills development or required materials and equipment required.

Difference between a hosted placement and a subcontracting arrangement

Hosted placements in workplaces and with community organisations are different to subcontracting arrangements. A CDP provider may elect to subcontract some or all CDP services to a subcontractor in accordance with the rules set out in *Chapter 9.5 – Subcontracting*. Under a subcontracted arrangement, the subcontractor would generally be responsible for a broad range of services such as the delivery of remote employment services that involve undertaking compliance actions, recording attendance in the system, finding employment and delivering activities. The subcontractor, once listed as a known subcontractor in the funding agreement, is bound by the same obligation to fulfil the terms of the funding agreement as a provider.

By contrast, a hosted placement involves the host organisation taking job seekers into their own workplace or in the case of a community organisation, delivering an activity for a group of job seekers on behalf of the provider. A host organisation is only bound by the obligations as set out in the CDP Activity Host Agreement.

Case Study - Subcontracting relationship

Where a provider lacks presence in a remote community within their CDP region, in accordance with the rules in Chapter 9.5 of the Guidelines, the provider engages a subcontractor to deliver the full suite of CDP services in that community including delivering activities, recording attendance, undertaking compliance actions and placing job seekers into employment and entering into hosting arrangements with local businesses. The CDP provider must receive written approval from PM&C to engage the subcontractor and the subcontractor must be listed in the Activity Schedule of the provider's Funding Agreement. The subcontractor is not a host organisation and the subcontractor is bound by the same obligations as the provider for the services they deliver.

5.3 Hosted Placements in a community development activity

Job seekers can be placed in hosted placements in organisations normally staffed by volunteers such as in a women's centre, a men's shed or a charity store. This provides job seekers with the opportunity to gain experience build their skills and knowledge in a safe and none threatening environment and move them along a pathway towards working in a real workplace.

Because of the similarity to CDP Work for the Dole activities, activity generated income rules will apply to community development hosted placements (See Chapter 4) if the activity generates an income.

There are no limits on the duration of hosted placements in a community development activity or the number of job seekers that can be placed in these hosted placements, as long as it does not involve real work. Job seekers must be moved into more challenging activities when and if appropriate to move them along a pathway that develops their skills and prepares them for employment.

Case Study – Men's shed (Community Development Hosted Placement)

A community organisation runs a local men's shed, which is normally staffed by volunteers.

The provider approaches the organisation to run a hosted placement on its behalf. The organisation will supervise the job seekers and allow them to use their tools and facilities. Since the men's shed is a community development activity, there are no limits on the number of job seekers that can be placed in the activity or its duration.

The organisation enters into a hosting contract with the provider to run an ongoing Work for the Dole activity for 15 job seekers for 6 hours per day, 3 days per week and 3.5 hours per day, for the other 2 days of the week.

The provider pays the organisation \$6,000 per annum per job seeker to run this activity on their behalf. The organisation hires a supervisor to teach the job seekers carpentry skills. The provider continues to be responsible for monitoring attendance and compliance.

5.4 Hosted Placements in a workplace

A workplace such as a business, social enterprise or government agency can also offer hosted placements for job seekers. A hosted placement in a workplace can be an important step for a job seeker's successful transition from unemployment to a paid job. Experience in a workplace can:

- Boost a job seeker's employability.
- Introduce long-term job seekers to workplace norms.
- Improve a job seeker's self-esteem.
- Encourage job seekers to aspire to paid employment rather than rely on welfare.

While any job seeker is eligible to participate, hosted placements in a workplace are likely to be more appropriate for job seekers with a higher work capacity and capability.

Providers are encouraged to arrange hosted placements in as many real workplaces as they can. For information on how to promote CDP to potential host organisations and job seekers refer to *Chapter 11 – Marketing and Promotion*.

An employer, including a business and government agencies, can advertise for and select job seekers for workplace hosted placements within certain limits. Employers can also negotiate with their local CDP provider to source suitable job seekers.

A workplace hosted placement is one that provides job seekers with experience doing things that:

- are done by paid workers
- produce goods or services for sale
- help deliver government services.

Where hosted placements are in a workplace or involve real work, limits apply on the duration of the hosted placement and on the number of job seekers that can be hosted. Limits are to ensure that hosted placements do not displace paid work. They will also ensure that job seekers are well supervised and surrounded by peers and colleagues as they would be in a normal workplace. Activity generated income rules do not apply to hosted placements in a workplace.

Where a job seeker is hosted in a real workplace, the following limits will apply:

- Host organisations with up to 10 employees can offer up to two hosted placements.
- Host organisations with 11 to 20 employees can offer one hosted placement for every five ongoing employees.
- Larger host organisations, including Commonwealth, State, Territory and local governments, with 20 or more employees can have four hosted placements plus one additional placement for every 10 ongoing employees over 20 employees. For example, an organisation with 32 staff can offer five hosted placements.

Host employers must ensure that job seekers are working within a reasonable ratio of job seekers to employees at all times. Large organisations are not permitted to group job seekers into large teams that have low ratios of employees to job seekers.

Providers may have workplace hosted placements within a related entity but these will be subject to the same limits as other host organisations, as outlined in this section.

Hosted placements in real workplaces may be offered up to six months.

PM&C may agree to extend workplace hosted placements for a further period, where, for example:

- The job seeker is engaged on a project that is expected to last longer than six months and there is value to the job seeker in being able to see a project through to its completion; or
- There are plans in place for the job seeker to begin seasonal work within six weeks of their workplace Hosted Placement ending. It would be less disruptive and beneficial for the job seeker to remain in the workplace hosted placement for the additional six weeks.

Case Study – Bakery (Workplace Hosted Placement)

A local baker needs a minimum of five employees to run the store. He could use some extra help and is considering increasing his workforce. He talks to the local provider about taking on a couple of workplace hosted placements. As this is a real workplace, there are limits on hosted placements. As the baker currently has five staff he can have two hosted placements for six months.

The baker enters into a contract with the provider to take on two job seekers for 4.5 hours a day, 5 days per week for 6 months. As part of the contract, the provider pays the baker \$3000 for each job seeker to cover the baker's training costs during the placements.*

After the 6 month placement, the baker is particularly impressed by one of the job seekers and offers her a full-time job. After the job seeker has been employed for six months, the baker is eligible to receive employer incentive funding worth \$7,500.

**Both job seekers attend LLN courses 5 hours per week as part of their job plan in addition to these hours.*

Case Study – Childcare Centre (Workplace Hosted Placement)

A community run childcare centre is interested in taking on Indigenous job seekers to help out in the centre. The centre doesn't have any current vacancies, but is keen to partner with the CDP provider to provide work-like experiences for the job seekers. As it is a real workplace, there are limits on the number of job seekers they can host and properly supervise.

The centre works with the local provider to find two suitable job seekers to assist them. The job seekers learn about how the centre works and help out with the children for six months. At the end of the six months there are still no new jobs at the centre but the job seekers get a real job doing similar work at the local school.



Case Study – Short term Hosted Placement in a workplace

A local business has a contract to do some fencing. The job is likely to last for 6 weeks. The business owner approaches the local provider to see whether he can have two job seekers to help and get experience on the job. There will be four paid workers on the fencing job so he can host two job seekers.

The fencing job is 400 kilometres away so the job seekers can't come home each day. The provider finds two job seekers that are interested in the placement. The business enters into a contract with the provider to undertake an activity for two job seekers for 30 hours in one week over six days and 20 hours in the next week over four days. The provider agrees to pay the business \$150 per job seeker per week to undertake this activity. This is enough for travel and extra costs.

At the end of the placement, the business offers one of the job seekers part time works. After returning home, the other job seeker moves into another activity.

Case Study - Local council (Workplace Hosted Placement)

Four job seekers are keen to get experience working at the local council. The provider talks to the council about taking them on as hosted placements. The council is interested but knows that it does not have the money to covert placements into real jobs after six months. The council and the providers explain this to the job seekers. The job seekers still want an opportunity to get six months real workplace experience with the council.

As this is a real workplace, there are limits to the number of job seekers they can host. The council places two job seekers in its eight person maintenance team and two job seekers with its administrative staff. This ensures that job seekers can be properly supervised and get quality work experience.

At the end of the six months, there are no vacancies to convert the placements into real jobs at the council. The provider helps the job seekers to move out of the hosted placements into an activity that they are converting into a business that does maintenance and cleaning work. The council provides placements, training and work experience to another four job seekers.

5.5 Converting hosted placements into jobs

Providers should encourage government agencies or businesses with more than 50 employees to offer employment to job seekers at the end of their six month workplace Hosted Placement.

Where large employers (those with *greater* than 50 employees) fail to convert workplace Hosted Placements to real jobs at the end of their six months, PM&C will review and consider whether that business should continue to access hosted placements in the future.

Underperforming job seekers must be given a fair and early opportunity to remedy any performance issues that impact on their ability to secure permanent employment with the host employer at the end of the placement.

Providers should also encourage host employers with *fewer* than 50 employees to offer employment to at least some job seekers at the end of their six month workplace hosted placement. However, PM&C will not prevent smaller employers that fail to convert sufficient numbers from access workplace hosted placements.

To facilitate the conversion of workplace hosted placements into real jobs, employers can be paid a \$7,500 employer incentive funding amount if they employ and retain job seekers for 26 weeks (See Chapter 6.3 for additional information on *Employer Incentive Funding*).

5.6 Additional hosted placements in a workplace

The PM&C Regional Manager will consider and may approve higher numbers of hosted placements in a workplace on a case-by-case basis, generally for temporary periods. PM&C will only approve additional hosted placements in real workplaces with caution, taking into account the following criteria:

- Placements do not displace real jobs or reduce the hours of paid workers
- PM&C sees evidence of increased employability – for example, employers have converted earlier placements into real jobs in the business or elsewhere

The criteria are explained in more detail below.

Protecting real jobs

Additional Workplace Hosted Placements should not undermine real jobs in both not-for-profit organisations and other enterprises. PM&C will approve additional workplace hosted placements only when real jobs are not displaced. For example where:

- A community organisation may wish to provide healthy food for elderly residents who would not otherwise afford for the service;
- A local council may wish to plant trees along roads but government funding has not been available for the project; or
- A landscape business may volunteer to create a recreational area for young people, using job seekers as labour and donated materials.

Increasing employability

PM&C will agree to additional workplace hosted placements when employers display a track record of converting a high proportion of hosted job seekers into employees. For example, a hardware store with five employees agrees to support two workplace hosted placements. After three months, the owner decides to employ the two job seekers, and seeks approval to host three job seekers. PM&C approves the arrangement because of the owner's proven record of hiring hosted job seekers.





6. Working with Employers and Employment Outcomes

6.1 Overview

A key objective of the CDP is helping job seekers to gain ongoing employment. To achieve this, providers should:

- Build strong links with employers to identify ongoing job opportunities, training and work experience pathways to get job seekers into employment;
- Regularly assess the suitability of job seekers on their caseload for job opportunities with employers; and
- Support job seekers as they move into employment by providing Basic Services, including post placement support.

From 1 July 2015, providers will receive Employment Outcome Payments for placing and retaining a job seeker in employment for 13 weeks and 26 weeks.

6.2 Employment Outcome Payments

Employment Outcome Payments are made to providers to encourage them to support job seekers into employment and ensure they stay in employment.

When providers place job seekers into employment they should record a Job Placement in the CDP IT System. This allows the CDP IT System to track a job seeker's progress towards achieving an Employment Outcome. Providers should record the employment as an activity in the job seeker's Job Plan under the employment category. Employment should not be recorded in the Job Plan as a Work for the Dole activity.

Providers can claim an Employment Outcome where a job seeker has achieved:

- 13 weeks of employment
- 26 weeks of employment (i.e. a further 13 weeks of employment after the initial 13 week Outcome)

For each 13 week period, an allowable break in employment of four weeks is permitted. This means that a provider can claim a 13 week Employment Outcome Payment if a job seeker is employed for 13 weeks over a 17 week period.

Allowable breaks are periods of approved unpaid leave that a job seeker takes from work. Allowable breaks include when a job seeker has a break between finishing one job and starting another. Allowable breaks also include unpaid breaks in employment due to illness or carer emergencies, or Christmas breaks and shut downs.

Payments will vary depending on whether the job seeker is employed on a full time or part time basis. This is summarised in the table below.

- A Full Time Employment Outcome occurs where the job seeker is fully off income support or fully meets their hours based requirements;
- A Part Time Employment Outcome occurs where a job seeker works sufficient hours to reduce their Income Support by at least 60 per cent or partially meets their hours based requirements (see clause 46.3 in RAC 1). The hours of employment needed to achieve a 60 per cent reduction in Income Support will depend on the type of Income Support the job seeker receives and their hourly rate of pay.

Provider Employment Outcome Payments Table (amounts excluding GST)

	Provider		
	13 Week Employment Outcome	26 Week Employment Outcome	Total possible on achieving 26 Week Employment Outcome
Full Time Employment Outcome	\$ 2,250	\$ 5,250	\$ 7,500
Part Time Employment Outcome	\$ 1,125	\$ 2,625	\$ 3,750

Providers can claim Employment Outcome Payments for job seekers that they employ or that are employed by a related entity.

6.3 Employer Incentive Funding

An Employer is eligible for a one-off incentive payment of \$7,500 (exclusive of GST) if they employ a job seeker who achieves a Full Time Employment Outcome for 26 weeks, subject to allowable breaks. Employers can use Employer Incentive Funding in any way they choose, including to cover additional training costs or as a form of wage subsidy.

An Employer can receive a payment of \$3,750 (exclusive of GST) if they achieve a Part Time Employment Outcome over 26 weeks, subject to allowable breaks.

For each 13 week period, an allowable break in employment of four weeks is permitted.

An Employer cannot count a period of employment with another Employer towards their 26 week Employment Outcome.

Case Study – Allowable Breaks

Jimmy has been employed for 10 weeks with a bricklayer working on a construction project. The project has come to an end and the company has let Jimmy go as it has no further work.

A provider can still claim a 13 week Employment Outcome in relation to Jimmy if it can help him to secure another three weeks work within four weeks of being let go.

If the bricklayer picks up another contract and re-hires Jimmy two weeks later for a further 10 weeks, the provider will receive an Outcome Payment after Jimmy has been employed for a total of 13 weeks.

The bricklayer will not receive a 26 week Employer Incentive payment unless Jimmy is rehired for at least an extra 16 weeks, within four weeks of having been let go.

The Employer Incentive Funding must be claimed by the provider and paid to the Employer.

The provider will need to claim the Employer Incentive Funding once it appears on the 'available claims' list. This will be a manual claim by the provider, and there is no time limit to claim.

Providers that claim and receive Employer Incentive Funding must:

- Pay an equivalent amount to the Employer, within 10 business days of the funding being received; and
- Ensure an Employer is only paid once for each job seeker.

Providers do not need to claim payments if the Employer has a contract with the Government for employment of remote job seekers, e.g. under the employment parity initiative.

Providers cannot claim Employer Incentive Funding for job seekers that they employ. Instead, providers will receive up to \$7,500 in Employment Outcome Payments.

State, territory and local government bodies are eligible to receive Employer Incentive Funding with the approval of the PM&C Regional Manager.

An entity that is related to a provider can claim Employer Incentive funding when they employ a job seeker, with the approval of the PM&C Regional Manager. The provider and the PM&C Regional Manager will develop a list of related entities, which will be reviewable every six months. The PM&C Regional Manager will determine whether the related entity:

- is operating separately to the provider and should be treated as a separate business; or
- is not financially separable from the employment services business (for example the businesses are cross subsidising each other) and they should be treated as the same business.

Generally, related entities operating independently from the provider will be treated in the same way as other employers. This is to encourage providers to establish businesses that are independently owned and operated, and to support the development of new entrepreneurs and vibrant remote economies.

The Regional Manager will monitor employers, including related entity businesses to ensure job seekers are retained beyond 26 weeks. PM&C may notify the provider if the Employer is not eligible to receive any further Employer Incentive funding where the Regional Manager has concerns that

employers are not retaining job seekers beyond 26 weeks in order to access repeat Employer Incentive Funding.

For further information on Employment Outcomes and Employer Incentive Funding, please refer to the *CDP Guidelines Toolkit – Employment Outcome Payments* on the Provider Portal.





7. Participating in CDP

7.1 Overview

Job seekers can expect to receive Basic Services and where eligible, Remote Employment Services (including Work for the Dole activities) when participating in CDP.

Most job seekers have mutual obligations and if these aren't fulfilled they may face sanctions or financial penalty under the nationally applied Job Seeker Compliance Framework.

7.2 Appointments

Job seekers will have regular appointments with their provider, at least monthly. Regular appointments allow timely review and updates to Job Plans and discussion on the ongoing suitability of activities. It is useful for the job seeker to discuss progress in relation to their Job Plan and to reinforce their understanding of what they are required to do at appointments. Attending provider appointments does not count towards the job seeker's required Work for the Dole hours.

For further information refer to the *Managing and Monitoring Job Seeker Appointments User Guide*.

7.3 Initial Interviews

Job seekers must have an initial interview with their provider. These interviews must be conducted in accordance with the CDP Funding Agreement. An initial interview is really important for job seekers because it sets up the foundations for ongoing interaction with their provider.

The provider should focus on giving advice about the best ways to look for and find a job and any local opportunities that might exist. Providers should also discuss the job seeker's aspirations, goals, community needs and the opportunities available in Work for the Dole. This interview is a good time for the provider to give the job seeker information on the *CDP Code of Practice and Service Guarantee*, and advice on how to search for a job and use facilities like job search.

As part of the initial interview, providers must undertake the Job Seeker Classification Instrument (JSCI) to identify the job seeker's individual circumstance and any barriers to employment.

For further information on the use of JSCI refer to the *CDP Assessments User Guide* and the *JSCI Form*.

At the initial interview, the provider must also negotiate a Job Plan with the job seeker, which is then agreed to and signed by the job seeker.

Lastly, the provider must record a result of 'Attended' in the diary against the job seeker's initial interview appointment, to complete the process of commencing the job seeker in CDP.

7.4 Referral or Direct Registration

Job seekers are generally connected with a provider by referral or direct registration.

As outlined in *Chapter 2*, the eligibility of a CDP job seeker is generally determined by DHS before they are referred to a provider.

Providers may also directly register job seekers if they meet the relevant criteria. Please refer to the *CDP Eligibility Fact Sheet* on the Provider Portal for more information on job seekers who can be directly registered.

Job seekers will also be transferred between regions if they relocate. In these instances, the provider should immediately contact the job seeker and commence providing services for them.

7.5 Contacts

Job seekers must meet monthly with their providers to discuss their progress and review the activities in their Job Plan. For some job seekers more regular contact may be required.

Providers must tailor the timing, location, and duration of contact to individual job seekers. Contact must be face to face, unless the job seeker resides in an area affected by extreme weather or a natural disaster, is in full time training, education or employment, or is participating in an activity outside of their community.

The provider should ensure that any changes are updated in the CDP IT system and Job Plan. It is important that after completing each activity a review is undertaken to track progress towards overcoming identified vocational barriers and non-vocational barriers to employment and assistance in identifying appropriate job opportunities is provided.

7.6 Job Search

In order to satisfy their mutual obligation requirements, most Social Security activity tested job seekers must be actively seeking paid work and this would be achieved through a Job Search requirement included in their Job Plan. The provider will determine a reasonable number of job searches to be completed per month, taking into account local labour market conditions and the individual job seeker's circumstances.

At least one Job Search per month must be recorded in the job seeker's Job Plan, however in stronger labour markets this amount would be expected to be higher. Providers must use the JS09 code in a job seeker's Job Plan to record their Job Search requirements. Please refer to the *Mutual Obligation Requirements User Guide* for more detail on who should undertake job search.

The provider must review and update the Job Plan regularly with the job seeker, and can adjust the number of job searches specified in their Job Plan as needed to be responsive to these factors.

Job search does not count towards the job seeker's required Work for the Dole hours. Any job search activities should be additional to the Work for the Dole hours the job seeker is required to complete.

7.7 Assessments

A JSCI assessment must be conducted with a job seeker at the initial interview. This assessment should make reference to a job seeker's non-vocational barriers, literacy and numeracy needs, existing qualifications, work and voluntary experience as well as any resumes or previously written job applications.

Assessments must be conducted by the provider when a job seeker completes an activity, has a change in personal circumstances or discloses information to the provider about changes to their skills or barriers to employment.

For further information on the JSCI refer to the *CDP Assessments User Guide*.

7.8 Job Seeker Compliance

Under Social Security Law all job seekers with mutual obligation in receipt of income support are required to attend appointments, look for work and undertake activities to improve their employability and to give back to their communities. A job seeker's mutual obligation is determined by the Department of Human Services and based on income support type, age, work capacity, whether year 12 or equivalent has been completed and whether they have primary care of a child.

Providers have a significant role in overseeing mutual obligation requirements for job seekers by monitoring participation and, where job seekers are not compliant, making decisions about utilising the compliance framework or re-engaging job seekers through other strategies.

Providers should refer to Clause 24.14 of RAC 1 of the CDP Funding Agreement for details of their Delegates' obligations. Prior to taking action under the Job Seeker Compliance Framework in relation to any Eligible Job Seeker, Delegates must successfully complete Job Seeker Compliance Framework training via the online Learning Centre. This includes successful completion of the *Strengthening the Job Seeker Compliance Framework Quiz*.

Where providers determine it appropriate to utilise the Job Seeker Compliance Framework they will generally initiate the process by reporting the incident to the Department of Human Services. Consistent with the *Social Security (Administration) Act 1999*, the Department of Human Services is responsible for determining under Social Security law whether or not to impose a failure or penalty for non-compliance with activity test requirements (mutual obligations).

Under the *Social Security (Administration) Act 1999*, financial penalties may be applied on those who fail to meet their requirements without good reason, and again, these decisions are made by the Department of Human Services. However, providers have a number of strategies they can use to engage job seekers, such as giving a job seeker another chance to attend an appointment or letting them make up time missed from an activity, if they believe this will be a more effective way of re-engaging the job seeker than compliance action.

For further information refer to *the Job Seeker Compliance User Guide* and the *Comprehensive Compliance Assessment and Compliance Activities User Guide*.

7.9 Job Plan

The Job Plan outlines the items that will satisfy the job seeker's mutual obligation requirements and help get them into paid work. All job seekers must have a current Job Plan in place at all times in order to participate in CDP. Generally Job Plans are created at the initial interview to enable commencement in CDP services. The *CDP Job Plan Task Card* on the Provider Portal gives detailed guidance on how to create and manage Job Plans.

A Job Plan must reflect the appropriate number of hours per week required for a job seeker to meet their mutual obligation. These requirements could be as high as 25 hours per week, or a lesser number of hours as determined by the job seeker's individual circumstances.

Providers are required to deliver Basic Services to all job seekers and to make available various activity options for commenced job seekers with mutual obligations requirements. Job seekers not identified as Work for the Dole job seekers, for example because they are on a partial rate of payment or fall outside the 18-49 age cohort, may either volunteer for Work for the Dole or must meet their mutual obligations by participating in activities that are self-identified or participate in an alternative activity facilitated by their provider.

Providers should encourage all job seekers with mutual obligations to participate in Work for the Dole activities where they are the most suitable activities. Where a job seeker is meeting their mutual obligation by participating in Work for the Dole activities, they are only required to participate in the activity up to the hours outlined under their mutual obligation.

Job seekers without mutual obligation requirements who volunteer for CDP Provider Services must enter into a Job Plan in order to receive services. CDP Ineligible Participants must also enter into a Job Plan in order to receive CDP Provider Services.

The Job Plan must be recorded in the CDP IT System. Providers can choose whether job seekers agree to their Job Plan online or to sign a hard copy from 1 July 2015.

The Job Plan must consider the job seeker's individual circumstances, including whether they have part-time or full-time mutual obligation requirements.

Mutual obligation requirements need to be outlined in the Job Plan for the requirement to be enforceable. Penalties can then be applied by the Department of Human Services (DHS) under the Job Seeker Compliance Framework where those requirements are not met by job seekers.

Providers must advise job seekers of the consequences of failing to meet their requirements in the Job Plan and the potential impact on the job seeker's income support payment of the job seeker failing to give prior notice (with a Valid Reason) when they cannot attend appointments or participate in activities.

For more information on mutual obligations, please refer to the *Mutual Obligation Requirements User Guide* on the Provider Portal.

Maintaining Job Plans for Job Seekers

Providers must ensure that a job seeker has a current and up-to-date Job Plan at all times. Job Plans are generally updated when the job seeker's circumstances change and as they progress along their pathway to employment, in particular:

- When activities in the Job Plan are completed or expire;
- If the job seeker's circumstances change;
- If a job seeker's mutual obligation requirements change;
- When a job seeker has a Comprehensive Compliance Assessment;
- When a job seeker undertakes Compliance Activities to waive an eight week non-payment penalty.

When a job seeker gains part-time or full-time employment, the job seeker's rate of income support may reduce through income testing by Centrelink. The provider must renegotiate the job seeker's Job Plan to reflect this work as an activity that meets some or all of their mutual obligations. The new Job Plan must include Work for Dole activities or other suitable activities as needed to enable the job seeker to meet their Mutual Obligations up to their assessed capacity.

Work for the Dole eligible job seekers who gain part-time work and are subsequently on a partial rate of payment cannot be compelled to participate in Work for the Dole. If a job seeker chooses not to voluntarily participate in Work for the Dole activities they must meet their mutual obligations in alternative appropriate activities. For further information on the impact of employment refer to the *CDP Employment FAQs*.

For further information about Job Plans refer to the *Job Plan User Guide* and the *CDP Job Plan Task Card* on the Provider Portal.

Recording Attendance in the Activity Diary

Providers must use the Activity Diary to record activities the job seeker undertakes to meet their mutual obligation requirements. Providers must enter job seeker attendance in those activities in the Activity Diary. For further information on the Activity Diary refer to *Chapter 10* of these Guidelines.

This will be closely monitored by PM&C, as use of the Activity Diary will be the principal mechanism for reviewing achievement of job seeker attendance in activities and for calculating monthly provider payments. For further information on payments refer to *Chapter 8 – Payments*.

Job Seekers with Disabilities

Providers must provide tailored assistance to job seekers with disability. This assistance must take into account the job seeker's capacity for work and participation in CDP activities.

In Australia, definitions of disability are based on the World Health Organisation's (WHO) International Classification of Functioning, Disability, and Health (ICF), which uses 'disability' as an umbrella term for any or all of the following components:

- Impairments—problems in body function or structure.
- Activity limitations—difficulties in executing activities.
- Participation restrictions—problems an individual may experience in involvement in life situations.

Providers can access the following nationally available services for people with disability and their employers:

- The Employment Assistance Fund (EAF) —financial assistance for work-related equipment, modifications and services; and

- The Supported Wage System (SWS) —a workplace relations instrument that allows eligible job seekers with disability to be paid a productivity-based wage.

Providers will be able to utilise EAF and SWS in conjunction with JobAccess (www.jobaccess.gov.au), which is a free information and advice service about the employment of people with disability.

Providers should also consider purchasing additional services or support for job seekers with disability where appropriate.

The *Disability Specific Services User Guide* on the Provider Portal provides more detail on delivering CDP services to job seekers with disability.

For information on delivering services to Disability Support Pension recipients with mutual obligation requirements, refer to the *Disability Support Pension Recipients (Compulsory) Requirements User Guide*.

Vulnerability Indicator

The term ‘vulnerability’ relates to a job seeker’s capacity to comply with their mutual obligation requirements. DHS will only record a Vulnerability Indicator on a job seeker’s record if appropriate evidence suggests the vulnerability could pose a significant barrier to the job seeker’s ability to comply with their requirements.

A Vulnerability Indicator is intended to ensure both providers and DHS are aware of a job seeker’s circumstances. A Vulnerability Indicator does not exempt a job seeker from the activity test or mean that the Job Seeker Compliance Framework cannot be applied for non-compliance, where the provider chooses to use it. However, being aware of vulnerabilities is useful for providers when negotiating the job seeker’s activities and Job Plan to help determine if a job seeker will have any trouble meeting certain mutual obligation requirements.

‘Vulnerability’ for the purposes of the Vulnerability Indicator is:

- A diagnosed condition or documented personal circumstance that currently impacts on the job seeker’s day to day life.
- Temporary, episodic or ongoing.
- May impact to varying degrees on the job seekers capacity to comply with their requirements.

A Vulnerability Indicator is not:

- The same as a disability, though disability may contribute to vulnerability.
- An exemption – requirements still apply and need to be met.
- A valid reason for failing to meet a requirement in and of itself.
- Set in concrete – it is subject to review.

A Vulnerability Indicator should be considered when:

- Setting participation requirements for a job seeker.
- Determining the most appropriate action to take following non-compliance.
- Considering a job seeker’s reason for being unable to comply with a requirement.



8. Payments

8.1 Overview

Providers will be paid under an outcomes-based payment model. This means providers will be expected to ensure remote job seekers are not just signed up, but also attending their Work for the Dole activities, five days a week.

The programme is supported by a simplified set of payments:

Service Payments, including:

- **Basic Services Payments**; and
- **Work for the Dole Payments**.

For detailed information on Service Payments please refer to the [*CDP Guidelines Toolkit – Service Payments*](#) document on the Provider Portal.

Outcome Payments

(Outlined in [Chapter 6 'Working with Employers and Employment Outcomes'](#)):

- **Employment Outcome Payments** which are payable to providers where job seekers achieve 13 and 26 Week Employment Outcomes;
- **Employer Incentive Funding** which is payable to Employers where job seekers have been employed by one Employer for a 26 Week Period;

Other Payments

- **Ancillary Payments** where applicable, from time to time, under RAC1 of the CDP Funding Agreement; and
- **Funding in relation to Strengthening Organisational Governance** which is one off payment for becoming incorporated, if the incorporation requirement set out in the CDP Funding Agreement applies to providers.

8.2 Service Payments

Service payments for providers incorporate:

- **Basic Services Payments** which are payable for Basic Services to job seekers who are not required to participate, or who have not chosen to participate, in Work for the Dole (these job seekers are called 'Basic Participants' in the CDP Funding Agreement); and

- **Work for the Dole Payments** which are payable for job seekers undertaking both Basic Services, such as attending provider appointments and Job Search, and Work for the Dole Activities (these job seekers are called 'WfD Participants' in the CDP Funding Agreement);

Providers will not receive service payments for job seekers who have not been commenced and/or who do not have an Approved Job Plan.

Monthly payments are calculated on the fourth Wednesday of each month, based on data entered in the CDP IT System as at close of business (5pm local time) and paid on or before the third business day of the next month. Where this is not possible, providers will be advised of alternative arrangements.

8.3 Service Payments Rates

Service payments are paid monthly to providers according to the rates outlined below.

Payment type	Annual Payment Value (GST Ex)	Monthly payment (GST Ex)
Basic Services Payment (Excludes job seekers participating in Work for the Dole)	\$ 4,000	\$ 333.33
Work for the Dole payment (excluding GST)*	\$ 12,450	\$ 1,037.50

*Where there is a hosting arrangement in place, a negotiated payment must be made to the host organisation from the \$12,450 Work for the Dole payment. Typically, this should be around half the amount that would normally be received by the provider.

8.4 Basic Services Payment

The Basic Services Payment is paid monthly to providers based on the total number of 'Basic Participants' recorded in the CDP IT System. A 'Basic Participant' is defined as an Eligible Job Seeker who is not a Work for the Dole Participant. Basic Services payments will coincide with Work for the Dole Payments, resulting in a single monthly payment being received by providers.

If a Basic Participant volunteers to participate in Work for the Dole, the provider will receive the Work for the Dole Payment based on the job seeker's Job Plan including Work for the Dole, the job seeker being placed into a Work for the Dole activity, and the job seeker's attendance recorded in the Activity Diary, rather than the Basic Services Payment.

8.5 Work for the Dole Payment

Providers will be paid a monthly payment for the actual attendance of job seekers in Work for the Dole activities as recorded in the CDP Activity Diary.

Providers will be paid under an outcomes-based payment model. This means that providers will be expected to ensure remote job seekers are not just signed up, but also attend their Work for the Dole Activities, five days a week. Payments will be monthly, in arrears, to enable assessment of performance prior to calculation of the payment.

It will be important for providers to manage their caseload to optimise attendance levels, using the Job Seeker Compliance Framework when needed when a job seeker does not attend an activity without good reason (refer *7.8 Job Seeker Compliance*).

Providers will receive the same rate of Work for the Dole Payment, irrespective of whether the job seeker has a partial capacity to work. So, if DHS assess that a job seeker has the capacity to perform 15 hours a week, the provider will still receive the full Work for the Dole Payment if the job seeker attends activities for 15 hours. This recognises that often job seekers with a partial capacity to work require the same level of servicing as job seekers with a full capacity.

Providers will be paid Work for the Dole Payments if the following conditions are met:

- They have placed the job seeker in enough activities to meet the participation requirements in their Job Plan (up to 25 hours per week), the job seeker attends these activities and the provider records their attendance in the Activity Diary;
- Where a job seeker did not attend, the job seeker had good reason *(known as a Valid Reason and/or gave prior notice consistent with the definitions outlined in the Job Seeker Compliance Framework), and the provider records a Valid reason in the Activity Diary; or
- Where a job seeker did not attend, and did not have a good reason (known as an Invalid reason) and the provider took all reasonable action in relation to non-attendance (including submitting a Participation Report to DHS**) and following this action were able to re-engage the job seeker back into Work for the Dole activities within 14 days.

Providers will not receive Work for the Dole Payments if they have not recorded job seeker attendance in the Activity Diary.

It is important that providers actively manage job seekers and immediately address non-attendance. Assisting job seekers to build skills and daily routine is central to getting them on a pathway to work.

For providers to receive Work for the Dole Payments they will need to actively engage and manage job seeker compliance. This means using all the tools at their disposal.

When job seekers are on 'time off' or a break from Work for the Dole, the provider will receive Basic Payment for that job seeker for that period (Refer *3.3 Criteria for Participation in Work for the Dole and Special Circumstances*).

When Work for the Dole required job seekers are granted an exemption from meeting their mutual obligations by DHS, providers may receive the Basic Payment for that period. Job seekers who are granted an exemption will have a status of 'suspended' in the CDP IT System. Having a 'suspended' status attracts a Basic Payment if the job seeker has Work for the Dole in their Job Plan and is placed into an activity, as outlined in the *CDP Guidelines Toolkit - Service Payments*. For more information on exemptions please refer to the Guide to Social Security Law:

<http://guides.dss.gov.au/guide-social-security-law/3/2/11/40>

***For more information on determining a valid reason/reasonable excuse for non-attendance at activities, please refer to the *Job Seeker Compliance Framework* on the Provider Portal.**

**** Please note that providers cannot submit a Participation Report for job seekers who have a Comprehensive Compliance Assessment (CCA) being undertaken.**

Managing Attendance

Case Study – Individual

Elizabeth must attend her Work for the Dole activity of gardening at the local primary school for 25 hours per week, across five days*:

- Elizabeth attends her activity on the Monday and Tuesday for the whole five hours;
- On Wednesday Elizabeth is unwell and is unable to attend her activity. Elizabeth calls her provider to let them know she is unwell and visits the doctor;
- On Thursday Elizabeth returns to the activity and completes her five hours; and
- On Friday Elizabeth does not show up and the provider Supervisor knows that she has gone to watch the local football carnival. Elizabeth does not give her provider any notice or warning, or an acceptable excuse for not attending.

In this case the provider records Attended in the Activity Diary for Monday, Tuesday and Thursday, records a Valid reason for Wednesday and records an Invalid reason for Friday. The provider would have their Work for the Dole Payments reduced for the one day that Elizabeth did not attend without a Valid Reason (the football carnival); unless the provider took all reasonable action in relation to non-attendance (submitting a Participation Report to DHS) and was able to re-engage the job seeker within 14 days.

*noting while this case study has 5 hours per day Monday – Friday, participants can have more than 5 hours per day scheduled activity







9. Conducting Services

9.1 Overview

Providers are responsible for delivering Services in accordance with the CDP Funding Agreement and these Guidelines. Services must also be delivered in line with the *CDP Code of Practice and Service Guarantee*, available on the Provider Portal.

This chapter provides guidance to assist providers to conduct services.

Information includes:

- Risk management
- Customer feedback
- Dispute resolution

For further information on conducting services in accordance with the CDP Funding Agreement refer to the *User Guides* on the Provider Portal.

9.2 Location and Level of Services

Providers are responsible for delivering Services within the allocated Region(s). Providers are required to maintain at least one full time Site (that is open Monday to Friday from 9am-5pm on business days, or as otherwise agreed with PM&C) within each Region and any additional Sites required to deliver sufficient services.

Sites must be open on business days and times consistent with the Activity Schedule and be accessible to people with disability.

9.3 Code of Practice and Service Guarantee

Providers are obliged to deliver services in line with the *CDP Code of Practice and Service Guarantee*, which must be available at their offices for job seekers and the public.

9.4 Personnel

PM&C is entitled, on reasonable grounds, to request providers remove personnel from work on the services (for example, in the event of actual or suspected serious misconduct).

9.5 Subcontracting

Subcontractors are permitted with prior written approval from PM&C. Subcontracts must bind subcontractors to, with respect to PM&C, the CDP Funding Agreement and relevant workplace health and safety provisions.

Subcontractors may be engaged to perform any of the provider's obligations under the CDP Funding Agreement although Hosts can only offer activities in accordance with these Guidelines.

Where a subcontractor is delivering a substantial part of CDP services for the provider (i.e. delivering most of the CDP services for an entire community within the region), the subcontractor needs to be approved by PM&C and listed in the Activity Schedule of the provider's Funding Agreement.

Where a subcontractor is hosting a Work for the Dole activity or is a local employer providing Hosted Placements, they do not need to be included in the Activity Schedule of the provider's Funding Agreement. However, an Activity Host Agreement must be in place between the provider and the subcontractor.

9.6 Serious Incidents

Providers must notify PM&C immediately if a serious incident occurs or almost occurs (that is, any circumstances that could have resulted in the occurrence of a serious incident).

A serious incident is an incident that occurs during, or from provider activities that results in:

- Death or an injury for which medical attention was sought or ought reasonably to have been sought; or
- Police involvement (including drawing the attention of the police).

If a serious incident occurs providers must submit a serious incident report to PM&C within 24 hours.

For further information on insurance refer to the *Insurance Manual* and the *Insurance User Guide* on the Provider Portal.

Providers must then provide a detailed written report to PM&C within 10 business days. The written report must include:

- A description of the incident and injury;
- What action has been taken to manage the incident;
- What the provider has done to reduce the risk of the incident happening in the future;
- How the provider will minimise disruption to services or activities; and
- Any other details of the incident that the provider considers relevant, or as requested by PM&C or the insurance broker.

PM&C will then advise what other actions providers need to take.

9.7 Use of Interpreters

If required, providers must engage an interpreter to facilitate communication with job seekers.

If a job seeker requests the use of an interpreter and the provider refuses to provide one, they must keep a record outlining the reason for their decision.

The provision of interpreters should be consistent with the General Terms and Conditions of the CDP Funding Agreement.

9.8 Police Checks and Working with Vulnerable People

Providers may be required to conduct Police Checks for Eligible Job Seekers and CDP Ineligible Participant engaging in some activities, particularly activities involving Vulnerable People.

A Vulnerable Person is a person who is unable to fully take care of themselves or is unable to protect themselves against harm. This could be because of age, illness, trauma, disability or any other reason.

Specifically, activities that require Police Checks include those where:

- Legislation requires police checks to be conducted;
- The activity is subject to industry accreditation requirements, industry standards or a legal requirement that the activity can only be carried out by people who have not been convicted of particular crimes;
- The activity is specified by PM&C as requiring Police Checks; or
- It is an activity in which the Eligible Job Seeker, CDP Ineligible Participant, the provider, Supervisor or Mentor will have regular or unsupervised contact with children, the elderly or other classes of Vulnerable People, and for which it would be considered wise by a reasonable person that a Police Check be conducted.

Depending of the nature of the activity it may be necessary for a provider to get a Working with Children check as well as a criminal records check, as only certain information will be provided in each.

A provider should have activities available that do not require a Police Check to be undertaken.

These activities can be used to meet the needs of an Eligible Job Seeker who does not consent to a Police Check or for whom police check results indicate an issue of concern or unacceptable risk.

When a Police Check is required it is to be completed:

- Prior to involving a Supervisor or Mentor in work that involves any contact with a Vulnerable Person, and once every two calendar years during the period that the person is engaged in work with Vulnerable People; and
- Prior to involving an Eligible Job Seeker or CDP Ineligible Participant in activities that involves any contact with a Vulnerable Person.

For further information on conducting Police Checks refer to the *Police Checks User Guide*.

9.9 Managing Risk

Workplace Health and Safety

Under the CDP Funding Agreement, providers are required to ensure all activities are conducted within Commonwealth, State and local government laws and by-laws regarding workplace health and safety.

Section 3.2 Delivery has further details on Risk Assessments for activities.

Insurance

Providers must have public liability insurance, workers compensation, motor vehicle insurance, personal accident insurance and professional indemnity insurance.

For personal accident insurance providers must have insurance in accordance with the CDP Funding Agreement, except where activities are covered by PM&C insurance.

Providers should note that there are certain activities which are excluded from PM&C's insurance, or which must not be conducted without the consent of PM&C's insurer. Providers must not conduct any Work for the Dole activity, or place any job seeker into a Work for the Dole Activity, that is excluded from PM&C's insurance coverage, without first obtaining written permission from PM&C. Refer to the *Insurance Manual* and the *Insurance User Guide* on the Provider Portal for more information.

Conflict of Interest

A Provider's executive staff members and board members are required to sign Conflict of Interest declarations which must be lodged in the provider's conflicts register.

If a Conflict of Interest arises, the provider must notify PM&C immediately, and take action to resolve the Conflict of Interest.

Fraud

Providers must not engage in fraudulent activity and must take all reasonable steps to prevent fraudulent activity.

9.10 Customer Feedback

Feedback and complaints should be dealt with appropriately by a senior staff member.

Providers are required to keep a Customer Feedback Register and should ensure that:

- Provider staff members are aware of the Register;
- Appropriate provider staff have access to the Register; and
- Job seekers are able to give feedback or make complaints whether or not the Register is located at their site.

Providers should establish a customer feedback process to manage feedback and complaints about services. The customer feedback process should:

- Be consistent with the CDP Funding Agreement, Guidelines, Code of Practice and Service Guarantee;
- Inform people they may also lodge a complaint with the National Customer Service Line;
- Incorporate a Customer Feedback Register; and
- Be communicated to new job seekers.

As part of the feedback process, job seekers should be provided with contact details for the National Customer Service Line for situations when they feel they can't talk to their provider, or are not happy with the provider's response to their issue.

National Customer Service Line

1800 805 260 (free call from land lines) or email nationalcustomerserviceline@employment.gov.au

9.11 Dispute Resolution

If a provider has any concerns or disputes in relation to CDP they should first contact their PM&C Regional Manager.

If the issue cannot be resolved at this stage, it will be handled in accordance with clause 43 of the General Terms and Conditions of the CDP Funding Agreement.

If the issues remain unresolved, a complaint can be lodged with the Commonwealth Ombudsman on 1300 362 072.

9.12 Administration and Governance

Providers must carry out their business in keeping with all relevant statutes, regulations, by-laws and requirements of any Commonwealth, State, Territory or local authority and any of PM&C's policies as advised in writing by PM&C.

Providers must provide to PM&C immediately upon receipt, a copy of any notice requiring them to show cause why they should not come into any form of external administration and any record that the provider has or will come under one of the forms of external administration.







10. Information Technology (IT) and Records Management

10.1 Overview

The Employment & Community Services Network (ECSN) is the gateway to access IT applications to manage and deliver CDP services, including:

- The CDP Provider Portal secure site;
- The Learning Centre; and
- The CDP IT system.

This chapter provides information about those IT tools. For further information, providers must refer to the supporting IT Reference materials provided on the CDP Provider Portal secure site; as well as the CDP IT System User Guide published on the Learning Centre.

10.2 Employment & Community Services Network (ECSN)

ECSN is the gateway to access IT tools to manage and deliver Services.

The Provider Portal Secure Site

The Provider Portal secure site is a tool for providers to find information and advice on delivering CDP. The Provider Portal secure site hosts key documents including the CDP Funding Agreement, Guidelines and User Guides. Providers can access the Provider Portal secure site via the ECSN login page.

The Learning Centre

The Learning Centre is an online training facility for providers and PM&C staff. The Learning Centre provides training for employment services programmes and includes a range of valuable, special interest modules.

CDP IT System

The CDP IT system has been specifically designed for the Community Development Programme. Providers must conduct Remote Services using the online CDP IT system. The CDP IT system is an internet based system that is accessed from the Internet browser.

10.3 CDP IT system

The CDP IT system provides a number of tools to support providers:

- The Activity Diary;
- Job Seeker JobSearch App;
- Work for the Dole Supervisor Mobile App; and
- Calendar.

Providers must conduct CDP Services using the CDP online CDP IT system.

The CDP IT system supports the administrative processes required to manage the CDP. The CDP IT system is designed around CDP workflows and provides step-by-step guidance through these processes, including:

- A referral process that allows job seekers referrals from the Department of Human Services as well as direct registrations actioned by a provider;
- A noticeboard that keeps providers up-to-date with the important events with the job seeker and activity participation;
- A claims and payments feature.

Providers must comply with PM&C IT policies as detailed in the CDP Funding Agreement and any directions from PM&C in relation to IT.

Activity Diary

The Activity Diary is a tool in the CDP IT System that assists providers in the management and servicing of job seekers on their caseload and their activity-related mutual obligation requirements.

Providers must use the Activity Diary to:

- Record job seeker activity requirements in activities, both activities in the job seeker's Job Plan and in Activity Management (required under the CDP Funding Agreement);
- Record job seeker attendance in relation to Work for the Dole activities (required under the CDP Funding Agreement); and
- Link activity non-attendance to the Job Seeker Compliance Framework (for Eligible Job Seekers).

In addition to the above requirements, providers can use the Activity Diary to:

- Record job seeker attendance in other activities;
- Issue formal notification of requirements and any rescheduled requirements;
- Create attendance lists for activity supervisors;
- Automatically link job seeker attendance at activities to Activity Management;
- Automatically link to provider payments; and
- Automatically link to activity summary screen and job seeker summary screen.

Job Seeker JobSearch App

The job seeker diary is a central place for job seekers' appointment information. The diary is linked to the online calendar, but is for individuals. A job seeker's diary will only display the appointments of

that job seeker, whereas the online calendar is a tool to help providers manage all job seekers on their caseload and their upcoming appointments.

By looking at a job seeker's diary, providers can see all of their past and upcoming Appointments. Providers may need to use diary information as evidence for submitting a Participation Report at a later date, such as looking to see how many appointments a job seeker has not attended without a Valid Reason or a Reasonable Excuse.

Job seekers are now able to access the benefits of the Australian JobSearch website on their mobile devices (mobile devices will require advanced operating systems with working internet connectivity) via the JobSearch Job Seeker Mobile App.

The JobSearch Job Seeker Mobile App allows job seekers to access features from the website quickly and conveniently. Job seekers will be able to:

- Search for jobs based on their location, find a provider and save jobs onto their mobile devices;
- Manage their own dashboard by setting up notification preferences so they can receive job alerts or messages from their provider;
- View their provider appointments, add personal events and sync with their device's personal calendar;
- Send their latest resumes and cover letters directly to employers; and
- Agree, view or forward their Job Plan on their mobile devices.

Further information on the Australian JobSearch Job Seeker Mobile App can be found on the Provider Portal secure site and the Learning Centre.

Work for the Dole Supervisor Mobile App

Work for the Dole Supervisors will be able to record and lodge job seeker attendance in the Activity Diary on their mobile devices (Mobile devices will require advanced operating systems with working internet connectivity) via the Supervisor Mobile App. This allows them to submit the attendance of job seekers in real time, reducing paperwork and informing providers as soon as attendance is submitted by Supervisors.

Calendar

An important part of the CDP IT System that providers will use to manage their connection with a job seeker is the calendar. The calendar is used to book a number of different types of appointments with job seekers and helps them to keep track of any appointments that job seekers may have with their provider on any given day.

Following scheduled appointments, providers can record an appropriate result against each appointment in the calendar to reflect the attendance of the job seeker. This result reflects the decision the provider made about the job seeker's attendance and the next steps for the job seeker's servicing. The calendar also helps providers to connect with DHS and share information on a job seeker's participation and regular servicing.

10.4 Making a Claim for Payment for an Employment Outcome

To claim payment for an Employment Outcome Payment, providers must record in the CDP IT system when an Eligible Job Seeker has started in work by recording a Job Placement when a job seeker commences employment. The CDP IT system will then track the job seeker's progress towards achieving an Employment Outcome, and will automatically pay the provider the appropriate Employment Outcome Payment where the requirements of an Outcome have been met.

The CDP IT System will check whether a provider is entitled to an Employment Outcome Payment by confirming an Eligible Job Seeker's work hours declared to DHS on the Job Seeker Employment Hours Result (JEHR) or the job seeker's rate of Income Support Payments via the Job Seeker Rate Reduction Result (JRRR).

Automated special claims can be lodged in cases where a provider disputes the result of the JRRR or JEHR. Documentary Evidence will be required to support any special claims.

A payment for a Part Time Employment Outcome, once paid, cannot be upgraded to a Full Employment Outcome Payment. A payment for Part Time Employment Outcome will not be automatically paid to providers until 42 days after they become available to allow providers time to place a special claim for payment for a Full Employment Outcome should they have sufficient supporting evidence.

Where a job seeker has pre-existing part-time employment, a provider may claim an upgrade if the provider subsequently works with the employer and job seeker to achieve sustained, increased earnings or hours of work leading to a Full Employment Outcome. The requirements outlined in clause 46.3 of RAC1 to the CDP Funding Agreement must be met. A provider must provide a job seeker with additional Remote Services to be eligible for an upgrade. These must be:

- Identifiable and documented; and
- Directly responsible for the increase in hours or earnings from the Employment.

An upgrade is not available where:

- A job seeker has arranged their own increase in hours or earnings; or
- A job seeker's earnings or hours are already sufficient to achieve a Full Employment Outcome.

Employment Outcome Payment claims resulting from an upgrade to Employment will be automatically paid to providers where the CDP IT system can confirm the requirements of an Employment Outcome have been met.

Employer Incentive Funding will not be auto-paid to providers in the same way as Employment Outcome Payments. Employer Incentive Funding will appear on the 'available claims' list once the provider has received payment for a 26 Week Employment Outcome. Where an Employer is eligible to receive Employer Incentive Funding, this must be manually claimed by the provider and forwarded to the eligible employer, as outlined in [Chapter 6 'Working with Employers and Employment Outcomes'](#).

10.5 Records Management

Providers must manage records in line with the CDP Funding Agreement.

- CDP Funding Agreement Records – includes records created during the course of providing Services such as participant services records and the Customer Feedback Register;
- Commonwealth Records – includes records provided to providers by PM&C such as the Job Plan template or information about a participant; or
- Provider Records – includes records in existence prior to the CDP Funding Agreement commencing except for any Commonwealth Records.







11. Marketing and Promotion

11.1 Overview

Providers are expected to promote activities to the community and to job seekers in order to maximise the engagement of job seekers and to promote the programme to potential Hosts.

Providers must seek approval from PM&C before undertaking any public relations initiatives directly relating to CDP.

11.2 Contractual Obligations

As referenced in clause 51 of the General Terms and Conditions of the CDP Funding Agreement, providers must:

- In all publications, promotional and advertising materials, public announcements and activities in relation to the Services, and any products, processes or inventions developed as a result of the Services, acknowledge the financial and other support received from the Australian Government;
- Ensure that all advertisements, promotional activities and any other public relations matters in relation to the CDP Funding Agreement are consistent with the requirements set out in these Guidelines.

11.3 General Requirements

All advertisements, publicity, and promotion of the services must:

- Be approved in advance by PM&C;
- Refer to CDP;
- Acknowledge financial and other support provided by the Australian Government. Australian Government funding can be acknowledged using this text statement:

“This initiative is supported by the Australian Government.”

The Australian Government logo is not to be used on materials developed by the provider.

11.4 Promotions of Work for the Dole to Prospective Hosts

A provider may find it useful to advertise in the local community to seek activity proposals from potential Hosts, or to promote the CDP or activities. Advertising may include:

- Local newspapers
- Television
- Radio
- Leaflet drops
- Cold canvass letters
- Telephone calls

Providers may find that running forums and information sessions for Work for the Dole is a good way of letting potential Hosts know about the benefits of sponsoring a Work for the Dole activity.

Information sessions are a good opportunity to network and build relationships to encourage a diverse range of Work for the Dole activities. Many providers find that if they have a wide range of activities, it is much easier to ensure a participant will attend their Work for the Dole activity.

11.5 Participant or Host Consent to Publicity

The Australian Privacy Principles (APPs) prohibit the use of personal information of individual participants in publicity material without the written consent of the individual participant (unless one of the other exceptions set out in APP6 is available, refer:

<http://www.oaic.gov.au/images/documents/privacy/applying-privacy-law/app-guidelines/chapter-6>).

If a provider wants the media to contact or interview a participant then providers must obtain written consent from the participant (a sponsor can do this on behalf of a provider). Participants are free to speak to the media or other third parties.

If the media approaches a provider seeking access to a participant, providers should advise PM&C about the purpose of the approach and seek the participant's agreement. Remember, any written public comment about Work for the Dole must first be approved by PM&C.

Photographing Participants

To protect participant privacy (and by so doing adhere to the Australian Privacy Principles (APPs), information about individual participants including film footage and/or photographs, cannot be used without their written consent. Participants must provide written consent before photography or filming takes place for any publicity.

Providers must ensure that their Hosts (and all other subcontractors) also implement these procedures.

Occasionally, at activity functions (e.g. graduation ceremonies) or during the activity, participants may be asked by Members of Parliament, Senators, their staff or others to be filmed and/or photographed. This footage and/or photographs may be used to promote the benefits of CDP as a whole or the benefits of a particular activity. On these occasions, PM&C should be contacted for assistance in obtaining consent from the participant for use of their image in government publications.

Requests for Information from Third Parties

If providers are approached by persons (e.g. students) or organisations conducting research projects who are seeking access to Work for the Dole activity sites or premises, providers must first contact PM&C to obtain consent. If consent is given and the activity is with a Host4, permission must also be obtained from the Host Organisation in writing. Providers must also liaise with their PM&C Account Manager before providing responses to information requests from external sources.

The written agreement of each participant must also be obtained prior to any interviews and/or surveys conducted as part of a research activity.

Participants must be given the reason why the information is to be collected and to whom it will be disclosed. The information collected can only be done so in a manner consistent with the Australian Privacy Principles (APPs).

If a provider is approached by a MP or Senator or the media regarding publicity they should seek advice from PM&C before making any commitment.

11.6 Promotional Activities

Sharing Success

Providers are encouraged to share good news stories highlighting the positive experiences of Indigenous job seekers and the efforts of providers to support them in finding employment. Stories may also highlight the positive impact that CDP is making within communities. Good news stories are often promoted on PM&C's website: www.indigenous.gov.au.

Submit your story ideas to indigenous.gov.au@PM&C.gov.au.

Twitter posts that reference CDP activities should include #IndigenousJobs. Where possible, posts should tag @indigenous_gov and include #ClosingtheGap.

Facebook posts that reference CDP activities should include #IndigenousJobs and #ClosingtheGap. Posts should tag @indigenous.gov.au within the text.





12. Performance

12.1 Overview

Providers need to meet a range of Key Performance Indicators (KPIs), Performance Measures and Performance Targets that measure compliance, quality and the effectiveness of a provider's service delivery.

Poor performance against KPIs is a serious matter. The CDP Funding Agreement sets out different consequences that can be applied if there is poor performance by a provider.

The KPIs apply to all CDP Regions, although individual Regional Employment Targets under KPI 3 are set for each Region to reflect local employment conditions.

In the event of a natural disaster or other unforeseen events that may affect the providers' ability to deliver parts of the programme, PM&C will determine suitable substitute performance measures and Performance Targets, and their duration.

The following information in section 12.2 is a summary only. Further information about performance, including assessment and ratings systems is available in the *Programme Management Framework*.



KPI 1: Delivery of services in accordance with the CDP Funding Agreement

Performance Measure	Performance Targets
Basic Services	100 per cent of Eligible Job Seekers have been provided with monthly contact which complies with Clauses 6, 7, and 8 of RAC 1.
Helping Eligible Job Seekers find and retain a job	100 per cent of all Eligible Job Seekers have an individualised Job Plan that complies with the requirements set out in the CDP Funding Agreement.
	100% of Job seekers have been provided tailored assistance and quality training to overcome barriers to employment.
	100 per cent of Eligible Job Seekers placed in employment are provided with quality Post-placement Support in accordance with RAC 1.

KPI 2: Availability, attendance and appropriateness of activities for Work for the Dole Participants

Performance Measure	Performance Targets
Availability of activities for Work for the Dole Participants	100 per cent of Work for the Dole participants have been placed in one or more activities, sufficient to meet their participation requirement.
Attendance of Work for the Dole Participants	100 per cent attendance required of all Work for the Dole Participants in activities (in line with their mutual obligation requirements).
Appropriateness of activities	100 per cent of activities are appropriate to Work for the Dole Participants, local labour market, and the community.
Hosted Placements	The provider has made significant efforts to broker and place Work for the Dole Participants in quality Hosted Placements with local employers.

KPI 3: Achievement of the Regional Employment Target

Performance Measure	Performance Targets
Regional Employment Target is met	100 per cent of the Regional Employment Target is met.

12.2 Setting and Assessing the Regional Employment Target

Setting the Regional Employment Target

Regional Employment Targets set the required number of Eligible Job Seekers who achieve 26 Week Employment Outcomes during a specific six month period.

Regional Employment Targets are individually set by PM&C to ensure they take account of the specific context of each Region.

To ensure that Regional Employment Targets remain appropriate over time, Regional Employment Targets may be reviewed and reset every six months according to demographic, labour market and economic circumstances.

When determining a Region's Regional Employment Target, the following factors are considered:

- Previous Performance;
- Performance in comparable CDP regions;
- Current and future labour market opportunities;
- Seasonality in the labour market;
- Job Seekers disadvantage and concentration of all Job Seekers in the region;
- Discreteness of region and opportunities for mobility.

To be counted towards achievement of the Regional Employment Target, the provider must have received the 26 Week Outcome Payment.

Assessing the Regional Employment Target

Providers' achievement against Regional Employment Targets will be formally assessed during the Provider Performance Reviews every six months.

PM&C will provide 26 Week Outcome targets for each review period based on changes to remote employment. During each review, PM&C will assess providers on their ability to meet these new 26 Week Employment Outcome targets.

Providers will receive their 26 Week Employment Outcome targets at least six month before the review period commences.





13. Provider Compliance

13.1 Overview

Providers must conform to any applicable obligations under:

- The CDP Funding Agreement;
- The Guidelines, instructions, policies and procedures;
- Industry regulations, standards and codes; and
- Commonwealth, State and Territory laws, regulations, standards and codes.

The following information on compliance is a summary only. Further information is available in the *Programme Management Framework*.

13.2 Compliance Goals

PM&C's compliance goals are for providers to be fully compliant with the CDP Funding Agreement, Guidelines and policies, and any laws, regulations, standards and/or codes set by any relevant Governments or industry bodies.

In order to achieve this, PM&C will:

- Ensure all providers are given the information they require to voluntarily meet all of their compliance obligations; and
- Establish a robust monitoring and correction system to detect cases where this is not occurring and take appropriate corrective action.

13.3 Compliance and Assurance Approach

Providers are responsible for their performance and compliance. Providers must also have in place their own governance and control systems that support their performance, delivery of quality services and accuracy of payments consistent with the CDP Funding Agreement and relevant Guidelines.

PM&C acknowledges that the majority of providers are willing and able to comply with their obligations under the CDP Funding Agreement and the Guidelines; however some providers:

- may engage in inappropriate activities which do not meet these requirements or be inadvertently non-compliant due to poor governance or procedures; and
- will require training, corrective action or other more serious remediation to address entrenched non-compliance issues.

13.4 Compliance Issues for Particular Consideration

The following compliance issues may be areas for particular attention under the monitoring systems described in the *Programme Management Framework*:

Category	Compliance questions
Workplace Health and Safety	Are providers ensuring workplace health and safety risk assessments are conducted prior to activity commencement?
	Are activities being adequately supervised by suitably trained and qualified staff?
	Are job seekers being briefed on emergency procedures and work place health and safety requirements?
Governance structures, staffing and internal reporting	Are governance structures and internal reporting arrangements appropriate / adequate?
	Are internal risk controls in place, and are they adequate?
	Has there been a high level of staff or management turnover?
Claims	Are the claimed Employment Outcomes Payments and job seeker attendance reported in the Activity Diary accurate?
	<p>Is there a discrepancy in patterns of claims compared to previous review periods?</p> <ul style="list-style-type: none"> • Variations in the patterns of claims, or in the provider's performance, compared to previous assessment periods. • Higher than normal levels of claims compared to comparable CDP providers. • Claim patterns within period indicate possible breaches.
Application of Attendance Categories	Have Eligible Job Seeker attendance categories been applied correctly?
Assets	Have any Assets that have been partially or wholly funded by the Commonwealth Government been encumbered or disposed of without PM&C approval?
	Are all Assets safeguarded against theft, loss, damage or unauthorised use?
	Are all Assets used for CDP insured to their full replacement value?
	Are all Assets in good working order?
	Are all registrations and/or licencing of Assets up to date?
	Is there an Asset register and Asset Disposal Plan?
Conflicts of interest	Are there any conflicts of interest between the provider and any organisations associated with activities or Hosted Placements?

Category	Compliance questions
Customer feedback	Are there any valid complaints and/or poor feedback from Eligible Job Seekers, CDP-Ineligible Participants, stakeholders or communities about manipulative, poor service delivery or potentially non-compliant behaviour?
	Does the provider meet CDP Funding Agreement requirements with respect to Customer Feedback?
Financial management	Have all Funding been managed in accordance with Guidelines and the CDP Funding Agreement?
	Have all Funding transfers to Employers and subcontractors been executed in accordance with Guidelines and the CDP Funding Agreement?
Contracts	Are all contracts with subcontractors, Employers and Hosts in accordance with Guidelines and the CDP Funding Agreement?
General quality of record keeping	Does the provider comply with requirements in Guidelines and the CDP Funding Agreement with respect to: <ul style="list-style-type: none"> • Documentary Evidence • Eligible Job Seekers files • Digital records • Timeliness of reporting and Records management?





14. Performance and Compliance Strategies

14.1 Overview

The Programme Management Framework outlines how performance and compliance issues will be prevented, monitored, identified, reported and remedied both at a Provider and programme level.

The approach centres on four risk-based strategies to manage performance, compliance and the issuing of breaches and application of corrective actions:

- Prevention and Deterrence
- Monitoring, Assessment and Detection
- Response and Correction
- Evaluation and Reporting



14.2 Prevention and Deterrence

Prevention and deterrence are the first lines of defence against poor performance and non-compliance. To encourage strong performance and compliance, PM&C will:

- Communicate responsibilities and expectations clearly to providers through documents like the CDP Funding Agreement, the Guidelines and the Programme Management Framework Guidelines;
- Provide training and education, and encourage providers to seek out training and education opportunities;
- Support providers to share best practice, lessons learned and success stories and recognise excellence in performance.

14.3 Monitoring, Assessment and Detection

PM&C will take a risk-based approach to monitoring and assessment of the work of providers with a view to detecting instances of poor performance or non-compliance. We will use the processes outlined below to achieve this.

Provider Performance Reviews

PM&C staff will undertake six monthly, Provider Performance Reviews (PPRs) which assess a provider's performance against KPIs and Performance Targets.

PM&C reserves the right to conduct PPRs more frequently according to each provider's previous performance and compliance history and risk profile.

Desktop Monitoring of IT systems

Desktop monitoring will be undertaken both at the PM&C Regional Network and National Office level. It may be done as frequently as PM&C deems necessary. The monitoring will facilitate early detection of performance and compliance issues especially around:

- Placement of Work for the Dole Participants in activities; and
- Attendance of Work for the Dole Participants in activities.

Regular Liaison with Providers

PM&C staff will regularly liaise with providers to monitor performance or compliance and to support providers to meet their obligations. These meetings may be face-to-face, onsite at an activity, offsite, via phone or internet. PM&C will give notice to allow provider to prepare.

Spot Checks

PM&C staff may perform a formal spot check to assess one or more areas of performance and/or compliance. These may include, but are not limited to:

- Work for the Dole participant attendance
- Contact and Appointment diary
- Activities
- Community engagement
- Employer engagement
- Record and financial management

Surveys of Community Leaders and/or Elders, Employers, and/or Job Seekers

PM&C staff may conduct questionnaires of community leaders, elders, Employers and job seekers at any time. Any survey will be organised by and conducted by PM&C or at PM&C's expense.

Financial Reports and Audits

Financial statements provided to PM&C in accordance with the CDP Funding Agreement may be used as evidence of poor performance or compliance breach, including fraud.

Where the provider has audited financial statements, these must also be provided to PM&C and may also be analysed to determine whether breaches have occurred.

Targeted Assurance Reviews

PM&C may undertake Targeted Assurance Reviews, in response to areas of emerging or identified compliance and/or fraud risks at any time. Target Assurance Reviews may involve:

- One provider
- A small group of providers
- Specific CDP Region(s), and/or
- A specific element of the programme

Customer Feedback and Tip-offs

Feedback from customers of CDP providers (including job seekers, community representatives and employers) is an important indicator of a provider's performance.

Such feedback, whether received and handled by the provider, PM&C or a third party such as the Commonwealth Ombudsman will be used to monitor and assess provider performance and compliance.

14.4 Response and Correction

Where under-performance or non-compliance has been identified, PM&C will assess the severity and the appropriate corrective action to be applied, having regard to any extenuating circumstances.

Corrective actions can include helping a provider to improve, intervening in service delivery, imposing additional performance requirements or (in worst cases) terminating the CDP Funding Agreement. PM&C will ensure its corrective actions:

- Are proportionate to the severity of the breach and are taken in good faith;
- Take into account the capacity and motivation of the providers to return to compliance or satisfactory performance;
- Signal the seriousness with which PM&C views the performance or compliance issue.

Once the breach has been categorised and corrective actions have been determined, PM&C may issue:

- A Show Cause Notice, which gives the provider an opportunity to demonstrate why corrective action should not be taken in respect of a breach; or
- A Breach Notice, which outlines that a breach has occurred and what corrective actions PM&C will take (if any) in respect of the breach.

14.5 Evaluation and Report

The Framework will allow us to learn lessons from instances of non-compliance to improve the overall management of the programme.

The Programme Performance and Compliance Risk Assessment will provide the Department with an indication of the effectiveness of the compliance and fraud controls being applied across the programme. These controls should be proportionate to their respective risks, and be adjusted as the inherent levels of these risks change over the life of the programme.

By utilising both proactive and reactive strategies to seek continual improvement, PM&C will be able to effectively prevent and deter non-compliance, accurately monitor levels of compliance, and react swiftly to non-compliance, preventing significant losses and harm to PM&C.





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