

Submission to Department of Employment

Response to Discussion Paper for ParentsNext National
Expansion

Good Shepherd Australia New Zealand

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About Good Shepherd Australia New Zealand

Good Shepherd Australia New Zealand (GSANZ) is a community services organisation that has been delivering on its mission to disrupt the intergenerational cycle of disadvantage and enable the fullness of life, with a focus on women and girls, since 1863 in Australia and 1886 in New Zealand. We achieve this by challenging disadvantage and gender inequality through services, research, advocacy and social policy development.

Our specific expertise is in:

- **Safety and resilience** - supporting women to be resilient enables them to achieve improved outcomes in spite of the challenges they may face.
- **Financial security** - supporting women to access sufficient economic resources to meet their material needs so that they can live with dignity.
- **Educational pathways** - assisting women and girls to overcome obstacles that may hinder them from achieving their educational/vocational capacity.
- **Outcomes and evaluations** - developing evidence-based program designs across all GSANZ programs and services.
- **Research, social policy and advocacy** - research into emerging issues, identifying effective interventions for program design, policy analysis and advocacy.

GSANZ is part of a global network of services and advocates established by the Congregation of the Good Shepherd, with representation at the United Nations as a Non-Government Organisation with special consultative status on women and girls.

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Introduction

Good Shepherd Australia New Zealand (GSANZ) recognises and values the dignity that comes with participation in paid work. Access to meaningful employment and educational opportunities is important to disrupting the inter-generational cycle of disadvantage for women and girls and to ensuring their capacity to enjoy the fullness of life. GSANZ supports positive moves to enable greater workforce participation of vulnerable groups. However, we have serious concerns that a national expansion of ParentsNext, particularly prior to the publication of evaluation results, will undermine these efforts through placing program participation within a ‘mutual obligation’ framework, having a narrow focus on mothers which devalues the important role of parenting, and a ignoring the lack of real employment opportunities as the primary barrier to workforce participation (not disinclination).¹

An adequate and well-structured social security system is essential to the social and economic wellbeing of the country, and should acknowledge that there are certain demographics, such as parents of young children, that require income support at certain times in their lives.

In this submission, we highlight a number of concerns with the proposed national expansion of ParentsNext as it is currently envisioned, particularly as it may relate to and impact those with whom we work, including single parents, women who have experienced family violence and women who are carers. We will also highlight the concerns that GSANZ has regarding the upholding of human rights and outline evidence-based ways that could be employed to support people into paid work.

Recommendations

Recommendation one: That the participation fund and the offer of wage subsidies to work places should be maintained.

Recommendation two: That the Department of Employment provide more evidence on the amount of employment placements through ParentsNext that are casualised; whether traineeships (particularly full-time placements) are paid; and at what rate they are paid.

Recommendation three: That, in line with Recommendation two, the Department of Employment provide more information regarding how children are being cared for at times when their mothers were working, and to provide figures on the financial trade-off of outsourcing the care of children.

Recommendation four: That the employment placements are beyond precarious, casualised work that puts more stress on the family, limits long-term career options, and fails to lead to financial security.

Recommendation five: That the focus on mothers and single mothers in particular is shifted from the ParentsNext narrative, and that the program instead be focused on job readiness for all cohorts who have barriers to employment.

Recommendation six: That the compliance requirements linked to Parenting Payments are removed from the ParentsNext program.

Recommendation seven: That provider qualifications must be specialised to deal with such issues as family violence or mental and physical health issues. Lack of specialised training may result in potentially life-threatening decisions and/or negative outcomes for clients.

Recommendation eight: That incentives should be paid *to the participants*, not to the service providers.

Recommendation nine: That the Department of Employment support and fund Aboriginal and Torres Strait Islander communities to design and oversee their own interventions.

Recommendation ten: That the Department of Employment recognise and acknowledge that there are times, for example when parenting infants or young children, where paid work is not a viable option; however, there are other, more appropriate ways to support young parents in social engagement, increasing self-confidence and participating in society.

Recommendation 11: In line with Recommendation ten, that the Department of Employment work to encourage the Department of Human Services to support mothers of young children through investing in community houses and other social group opportunities for parents to counteract social isolation, such as walking groups, children's play groups, crafts, etc. These social ties are highly protective and inclusive of children, hence strengthening confidence in parents while increasing the parent-child bond.

Recommendation 12: That the Department of Employment freeze expansion plans until the evaluation report from the pilot sites is publicly available, and that the evaluation report is used to either strengthen the program design or to terminate the program, as dictated by the findings and recommendations.

Recommendation 13: That the Department of Employment requests verification/ opinion from the Joint Parliamentary Committee on Human Rights (JPCHC) regarding whether ParentsNext and consequentially its national expansion is in fact consistent with Australia's commitments under ICESCR.

Recommendation 14: That the Department of Human Services commit to keeping families above the poverty line. More financial resources results in more stability for families, reduction in social isolation, and more opportunities for addressing barriers to employment.

Recommendation 15: That the ParentsNext program should be 100% voluntary.

Recommendation 16: That the Department of Human Services provide universal 3-year-old kindergarten, so that particular to this submission parents will have a few hours per week to devote to study or participate in other activities that benefit their personal self-care and social connectivity.

Positive aspects of ParentsNext

There are aspects of the ParentsNext program which have potential for assisting marginalized people into the workforce. Specifically, we applaud the efforts to assist people to complete or add qualifications and/or take other practical steps to become employment-ready. Additionally, there is scope for the Participation Fund to provide practical supports for this to occur. Finally, providing wage subsidies to organisations that extend offers to people who have completed the program could assist in creating more opportunities for participants.

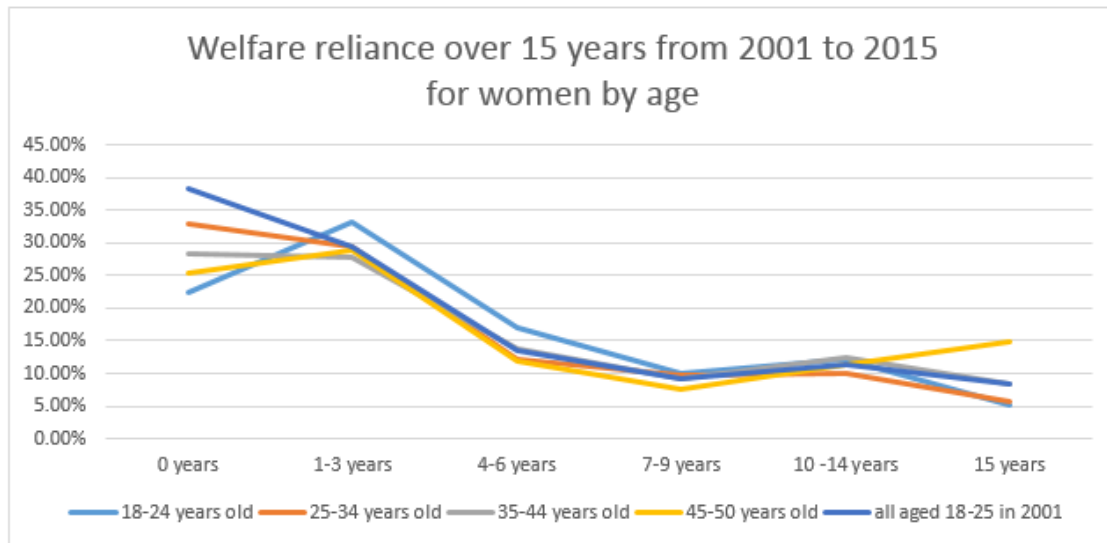
Recommendation one: That the participation fund and the offer of wage subsidies to work places should be maintained.

However, we also have grave concerns about how the program is designed, and suggest that some major design changes could make this program an important stepping stone towards gainful employment.

Mothers, welfare and work

While we understand the benefits of early intervention, we believe that the ParentsNext program demonstrates gross assumptions of long-term welfare dependency for mothers of young children. It is commendable that the program offers child-friendly offices, but when the intention is to have mothers re-entering employment at the earliest opportunity there seems to be little consideration for what will happen to the children. Recently-released Household, Income and Labour Dynamics in Australia (HILDA) data indicates that most women who are on welfare payments remain on them for 4 years or less, and these years coincide with the prime child-bearing and -rearing years (see Table 1 below).²

Table 1: Welfare reliance for women by age



Data from the 2017 Household Income and Labour Dynamics in Australia survey.

Whilst the ParentsNext program offers a range of support services, we fear that the young parents are being forced to fit their personal goals within the confines of the service provider's limited resources and networks. The majority of workers in precarious employment are women³, filling nearly 70 per cent of precarious positions.⁴ This is most often due to women's need for flexible employment that can work around caring roles. Therefore, we are concerned that the ParentsNext program could inadvertently worsen this bleak outlook for women's employment by encouraging women with young children to accept employment opportunities that lack security, adequate remuneration, or a long-term career pathway that will lead to financial security. Encouraging mothers to accept precarious positions reinforces gendered inequalities in employment and leads to long-term cycles of poverty for families. We suggest instead that mothers are not encouraged to seek employment until their children are, *at a minimum*, school age, and that there is a strong emphasis on assisting women to skill up for positions that are more secure.

Recommendation two: That the Department of Employment provide more evidence on the amount of employment placements through ParentsNext that are casualised; whether traineeships (particularly full-time placements) are paid; and at what rate they are paid.

Additionally, it is concerning to us that the examples provided in the Discussion Paper of 'successful participation' includes employment that is often casualised. Further, it mentions mothers of young

children completing traineeships but not whether these placements are remunerated, or at what rate.

Recommendation three: That, in line with Recommendation two, the Department of Employment provide more information regarding how children are being cared for at times when their mothers were working, and to provide figures on the financial trade-off of outsourcing the care of children.

Further, there is ample evidence that when mothers of young children re-enter the work force, there is a corresponding increase in expense. This includes the not insignificant costs of transportation and wardrobe requirements amongst others. There is also a significant cost for child care. For mothers of young children this often means keeping another woman in precarious employment - childcare⁵ - while she also is engaged in insecure work. Meanwhile, mothers are being encouraged, perhaps against their will, to limit their hours of raising their own children. Even from a purely financial perspective, the costs involved in employment may not outweigh the income.⁶

Recommendation four: That the employment placements are beyond precarious, casualised work that puts more stress on the family, limits long-term career options, and fails to lead to financial security.

The ParentsNext Discussion Paper states that “approximately 96 per cent of...participants [are] expected to be women” (p. 8).⁷ The focus on mothers - those in our society who can least afford the time to prepare for employment - is concerning. Women spend 16 hours per week on housework prior to becoming a parent, which jumps to 30 hours per week when their youngest child starts school, while caring duties jump from 2 hours per week to 51 hours when a baby is born.⁸ It is unhelpful to view mothers of young children as unemployed workers when they are in fact working longer hours than men in full-time positions, but largely without remuneration.⁹ There are many other groups who are at an employment disadvantage; we suggest that the services provided by ParentsNext be de-coupled from mothers and instead are provided to all marginalized groups who are struggling to create an employment pathway. For example, underemployment for young people is very high;¹⁰ providing them with pathways to steady employment can be a protective factor for poverty alleviation and reduced welfare dependency. Many people with disabilities would like to work, and such a scheme would be most welcome.¹¹ It is also surprising to us that fathers are not more of a focus for this program.

Recommendation five: That the focus on mothers and single mothers in particular is shifted from the ParentsNext narrative, and that the program instead be focused on job readiness for all cohorts who have barriers to employment.

Controlling framework and lack of provider accountability

The language of the ParentsNext Service Offer uses highly conflicting language such as ‘*encouraging* Indigenous parents to *prepare* for employment,’ and yet there is a strong emphasis on compulsory participants, ‘targeted’ and ‘required to participate under social security law’ (emphasis added). Additionally, the Discussion Paper states that “parents who do not fulfil their requirements may have their payments suspended until they re-engage, and may incur demerits” (p. 18).¹² Our concerns are that while there are guidelines set out for participation and the expectations of mutual obligations, the service providers have too much discretion in interpreting these policy guidelines. It has already been shown to be the case for providers in the Welfare to Work scheme that policy is interpreted inconsistently¹³ and clients are regularly subject to microaggressions;¹⁴ it is not realistic to think that ParentsNext providers will extend better support when the power imbalance is maintained through the actual or threatened withdrawal of welfare payments.

The Parenting Payment system already imposes a high level of conditionality on receipt of Parenting Payments, which has increased poverty levels particularly for single mothers and their children.¹⁵

Studies have found some groups in the community, particularly young people, experience confusion about their social security obligation requirements. This confusion can result in non-compliance and consequent suspension of payments leaving clients in severe financial hardship and distress, which in turn leads to increased demand upon community support services.¹⁶

It is critical that obligation requirements are achievable. They need to account for the genuine challenges particular groups face in participating in paid work. This means:

- recognising parenting as productive and valuable (economically and socially);
- ensuring that participation requirements genuinely account for and respect the limitations that being a parent (or other individual circumstances, such as having a disability, poor mental health, or lack of access to transportation) has on participating in paid work;
- ensuring that volunteering is recognised as a legitimate and valued activity; and

- ensuring people have the resources (money or otherwise) to meet their obligation requirements.

Recommendation six: That the compliance requirements linked to Parenting Payments are removed from the ParentsNext program.

Additionally, it is alarming that providers are expected to assist clients with highly complex needs, including those who experience family violence or those with physical or mental disabilities, but are not required to have specialist expertise in these areas. Poor decisions for these groups can lead to irreparable harm and can even be life-threatening.

Recommendation seven: That provider qualifications must be specialised to deal with such issues as family violence or mental and physical health issues. Lack of specialised training may result in potentially life-threatening decisions and/or negative outcomes for clients.

Finally, we are extremely concerned with the KPI bonuses paid out to providers for assisting clients to achieve certain outcomes. These payments are misplaced, and will result in providers pushing clients to certain outcomes; this has been shown to be disastrous for the Welfare to Work agencies.¹⁷ We suggest rather that these *bonuses are paid to the clients themselves*. They are the ones who are overcoming barriers to achieve important milestones that will make them more employment-ready, and they are also financially insecure.

Recommendation eight: That incentives should be paid *to the participants*, not to the service providers.

Service provision to Aboriginal and Torres Strait Islander populations

The Discussion Paper raises concerns about ensuring cultural competency for service providers who work with Aboriginal and Torres Strait Islander populations, of which many (in the current iteration of the program) will be required to participate in ParentsNext. GSANZ strongly recommends that such services are not forced onto Aboriginal and Torres Strait Islander populations, as this is a continuation of colonial practice and is highly unlikely to result in positive outcomes.¹⁸ We recommend instead that Indigenous populations and communities are allowed to self-identify barriers to employment and create their own responses. These programs can then be funded by the Department of Employment.

Recommendation nine: That the Department of Employment support and fund Aboriginal and Torres Strait Islander communities to design and oversee their own interventions.

Degradation of Childcare responsibilities

GSANZ strongly advocates that mothers of young children, particularly those who are single parents, not be included in the job seeker category. Having children is far more than just a temporary disruption to women's work lives. While there are changing expectations in the wider community about women's workforce participation,¹⁹ this has not been met with a corresponding reduction in the societal expectation that women take on caring roles. Single parents particularly must balance these two competing expectations, and it is important that any payment categorisation takes this into account. Most importantly, the rate that is set and any mutual obligation requirements that are developed must allow parents to meet the needs of children.

ParentsNext is undervaluing young mothers' parenting responsibilities, which should be highly valued when children are as young as 6 months old. We recommend waiting until children are aged 3 or 4 *at minimum* and can start to attend kindergarten or preschool before mothers are encouraged - not mandated - to connect with ParentsNext, in conjunction with extending the Parenting Payment (Single) until the age of 16.

Recommendation ten: That the Department of Employment recognise and acknowledge that there are times, for example when parenting infants or young children, where paid work is not a viable option; however, there are other, more appropriate ways to support young parents in social engagement, increasing self-confidence and participating in society.

Evidence suggests that devaluing their role as a parents creates a level of stress that impacts on women and children's emotional and economic wellbeing.^{20 21} Additionally, prioritising employment over parenting duties can lead to scarce resources being diverted to the high costs associated with employment rather than investing them into child development.²²

We suggest that, pertaining to mothers of young children, investing in parenting practice is a more salient use of funds. Specifically, programs which allow young mothers and their children to meet up provides important protective factors for child development, parent wellbeing, and increasing social support networks. This can be done through increased investments in community house programs, for example, and may include playgroups, parenting courses, and the like. While such

programs are often seen as ‘light touch,’ they provide important protective benefits for both parents and children.^{23 24 25}

Recommendation 11: In line with Recommendation ten, that the Department of Employment work to encourage the Department of Human Services to support mothers of young children through investing in community houses and other social group opportunities for parents to counteract social isolation, such as walking groups, children’s play groups, crafts, etc. These social ties are highly protective and inclusive of children, hence strengthening confidence in parents while increasing the parent-child bond.

No evidence of benefits for ParentsNext

There is no evidence that sending a parent back to work or engaging them in work training or preparation when their youngest is under the age of 5 will improve their ability to enter paid employment when they are ready to do so. There is also no evidence that the activities outlined in the ParentsNext National Expansion Discussion Paper will improve barriers to employment such as disadvantage, mental or physical health issues, dealing with domestic violence or lack of completion of high school when the recipients are caring for very young children. Good Shepherd does not advocate expanding any program which has not yet published an evaluation; nor does it advocate expanding a program in which the evaluation does not indicate positive outcomes for the recipients.²⁶

Recommendation 12: That the Department of Employment freeze expansion plans until the evaluation report from the pilot sites is publicly available, and that the evaluation report is used to either strengthen the program design or to terminate the program, as dictated by the findings and recommendations.

Poverty alleviation and compatibility with human rights

Australia signed onto the International Covenant on Economic, Social and Cultural Rights, or ICESCR, in 1975, which includes the right to social security. The United Nations Committee on Economic Social and Cultural Rights advocates that there is ‘a strong presumption that retrogressive measures taken in relation to the right to social security are prohibited under the

Covenant'.²⁷ Good Shepherd has serious concerns that linking ParentsNext participation to welfare payments is a breach of the convention. Further, the Discussion Paper clearly states that women are the primary target of this policy, which makes it discriminatory towards women in denying them their rights for social security and also places children at risk. We therefore strongly urge the Department of Employment to seek an opinion from the Joint Parliamentary Committee on Human Rights (JPCHC) regarding whether ParentsNext consistent with Australia's commitments under ICESCR.

Recommendation 13: That the Department of Employment requests verification/ opinion from the Joint Parliamentary Committee on Human Rights (JPCHC) regarding whether ParentsNext and consequentially its national expansion is in fact consistent with Australia's commitments under ICESCR.

It is Good Shepherd's view that the government has an obligation to ensure that those who are most marginalised and disadvantaged in Australia should not be deliberately kept below the poverty line. Many welfare payments do just that, and in particular this is the case for single parents, the vast majority of which are women.²⁸

Recommendation 14: That the Department of Human Services commit to keeping families above the poverty line. More financial resources results in more stability for families, reduction in social isolation, and more opportunities for addressing barriers to employment.

Positive ways to enable greater workforce participation

GSANZ's work with people who are disengaged from work has shown that positive reinforcement is more effective at changing unproductive behaviours than punitive measures. The evidence base for this work is outlined below and formed part of GSANZ's response to proposed changes in welfare conditions through the McClure review in 2015. We still, however, stand by our initial recommendations that mothers of young children should not be specifically targeted to engage in paid employment while their children are young.

Positive ways to enable change

There is extensive research, as outlined below, into what motivates people to make significant or difficult changes in their circumstances; this research is also bolstered by an understanding of how to maximise cognitive abilities for enabling change.²⁹ It is firmly established that three characteristics must be present in order for an individual to have autonomous, or internally-held, motivation for change:

- Individuals have a sense of **competency** (that is, they feel capable of achieving the task).
- Individuals have a sense of **autonomy** (they are able to self-direct their time and energy).
- Individuals have a sense of **community, or relatedness** (individuals have sense of contributing to a social network through their efforts, and being meaningfully supported by others).
- When motivation is externally applied (“controlled motivation”), it leads to rigid functioning, reduced wellbeing, and a lack of vitality - in short, characteristics which are inherently de-motivating for action.³⁰

When developing policy that is intended to motivate individuals to change, there is greater chance of success when the individual is allowed adequate autonomy to self-identify internal motivations in line with the desired change, is provided with coaching or training to provide a sense of competency to effectively make the change, and is enabled to embed the change within a supportive community.³¹

Self-efficacy, or a sense of self-directed control over decisions directly affecting the individual, is the cornerstone to effective change, as well as increased psychological wellbeing and internal resources.³² There are other factors which lead to improved cognitive processing. These include reduction of stress and other persistent negative emotion states, and elevating positive emotion states.³³ Developing extensive and highly-supportive social networks also has a strong and positive association with improved cognitive processing; in part due to the emotional benefits of social networks, but also because positive and empathic social interactions lead to improved executive function skills.³⁴ In terms of employment policy, put simply carrots are more effective than sticks.³⁵

Recommendation 15: That the ParentsNext program should be 100% voluntary.

Recommendation 16: That the Department of Human Services provide universal 3-year-old kindergarten, so that particular to this submission

parents will have a few hours per week to devote to study or participate in other activities that benefit their personal self-care and social connectivity.

Conclusion

GSANZ has serious concerns regarding ParentsNext as a program, and we urge the Department of Employment to reconsider the proposed national expansion.

We are very much in favour of the opportunity for people who are facing barriers to employment to commence or complete their studies and qualifications with the support of the ParentsNext program, however pressuring parents of young children caring for children as young as six months old is adding undue pressure which ultimately destabilizes the family as a whole. Additionally, we are very much against specifically targeting mothers of young children with this legislation, and believe that coupling it with punitive measures, including the suspension of welfare payments, is a breach of human rights. However, we do believe that if this program:

- is not targeted at mothers,
- is voluntary rather than compulsory,
- removes compliance requirements linked to welfare payments,
- ensures providers have the proper qualifications to support disadvantaged people,
- pays incentives to the participants rather than to the provider,
- supports Aboriginal and Torres Strait Islanders to develop and implement their own programs,
- focuses on skilling up for meaningful jobs with long-term security and a career pathway,
- provides more holistic supports to mothers with young children, such as universal kindergarten provision and more opportunities for social support, and
- ensures that welfare recipients are paid above the poverty line

then the program will be better designed to assist people who are currently sidelined from meaningful employment.

We would welcome the opportunity to elaborate on any of these points.

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