

COMMENTS ON THE DRAFT REPORT OF THE INDEPENDENT REVIEW OF JOB NETWORK

1. Analysis of and comments on the use of certain terms; relevance to the Draft Report's assumptions and recommendations.
2. A 'micro' description of one job seeker's supposed experiences with four providers; relevance to the Draft Report's assumptions and recommendations.
3. Comments on Draft Report as a whole.

1. USE OF CERTAIN TERMS:

In the Melbourne public hearing on the Draft Report and in general discussion, the following terms were used to describe the role of Job Network providers' service workers: "broker", "case manager", "personal advisor", "advocate", and "mentor". These terms (see below) express quite different conceptual backgrounds, quite different degrees of intensity of personal and professional investment, and a wide range of foci, – varying from essentially impersonal matching to reliance on organisational and professional loyalties and contacts to bring about especially advantageous career or business opportunities.

1.1

A. "BROKER":

Origins: commercial (middleman/dealer/agent); often constrained by legal requirements. Eg. sales agent, employment exchange clerk, second-hand goods dealer, insurance broker.

Degree of involvement: impersonal, personal contact incidental, minimal contact required – sometimes telephone sufficient.

Focus: satisfactory matching of individual's or group's requirements to the available coverage or opportunity; risk of conflict of interest (who is the client?)

Degree of intended impact on environment: no interest in changing either institutional provisions or coverage, or the mind-set, status or resources of the interested individual or group.

Character: speed, efficiency and accuracy in matching;

B "CASE MANAGER":

Origins: bureaucracy/administration in insurance, secondary and tertiary industries, accountancy. Eg. professional employment agency worker,

Degree of involvement: formal; bureaucratic.

Focus: conformity to formal procedural requirements;

Degree of intended impact on environment: environment is taken as 'given'; some interest in encouraging or expecting greater adaptivity of the unit or 'case' being managed.

Character: bureaucratic; cost-effective handling and turnover of units.

C. "PERSONAL ADVISOR":

Origins: consumer personal service industry, Eg. personal finances; physical training;

Degree of involvement: greater informality than for A. or B; the pressure on 'advisor' to produce results can produce greater involvement with the individual 'person'.

Focus: motive clarification; sustaining individual's commitment or effort; advice-giving. Area of focus can be narrow.

Degree of intended impact on environment: there is no interest in environmental manipulation; typically moves people routinely through standard procedures or behaviours or encouraging people to embrace certain products or services.

Character: somewhat overreaching, euphemistic lingo reminiscent of PR; often unsupported by strict ethical standards or by the 'professionalism' it hints at; often promising more objective handling than the reality dictates/permits; often promising a more comprehensive outcome than the process or product is capable of achieving, or than results justify.

D. "ADVOCATE":

Origins: legal, personal representation or disinterested support for policy change, Eg. lawyer, public interest lawyer, issue-oriented politician; NGO representing affected individuals.

Degree of involvement: long-haul commitment and personal involvement to a cause, group or individual in accordance with ethical responsibilities and constraints.

Focus: personal, group or institutional inadequacies; discrimination, imposition or deprivation;

Degree of intended impact on environment: can be intensive representative involvement with individual or group; often, based on awareness of deprivation and the wish to improve the lot of affected individuals, intensive effort to make particular environment more adaptive to particular groups' needs is typical.

Character: professional or semi-professional; commitment to starting from individual or group needs; questions of ethics and privacy of advocate's handling typically arise,

as do conflicts between commitment to individuals and to the cause.

E. "MENTOR"

Origins: art; craft; philosophy; professional practice; business enterprise. Eg. master artist or craftsman, established entrepreneur or employer; employment placement and training scheme whose operation relies in part on employers.

Degree of involvement: intensive and committed involvement with protege, also involves mentor's intensive involvement with his/her occupational field and his/her organisational contacts.

Focus: knowledgeable and trustworthy counselling by advisor based on personal experience; experience-based advice from someone committed to the field.

Degree of intended impact on environment: being extensive, multi-faceted and innovative, there is a readiness to push institutions to adapt to the needs of the mentor's protégé.

Character: these relationships of mutual commitment and trust range from individual and informal, to organisation-based and highly formulated; often involve personal referral of the individual recipient to others who the mentor regards as useful collaborators.

1.2

Relevance to Draft Report's assumptions and recommendations:

(i) Using more intensive relationships to assist job-seekers was used specifically in relation to the disabled in the 1970's, although a longer-term combined education and occupation programme ("New Careers for the Poor") began in the 1960's;

(ii) These more intensive relationship-based approaches clearly specified their target clientele;

(iii) These more intensive relationship-based approaches typically used and relied on the prestige and power of government, community-based, professional and business institutions, provisions and relationships. It was assumed/accepted/understood that effective employment placement and training programmes accurately aimed at assisting the most disadvantaged job-seekers to gain worthwhile jobs *required* integrated policy and institutional support;

(iv) In the Draft Report (to the extent they were used at all) and in comments during the public hearing, these terms were used interchangeably, without any distinctions being made.

(v) In the Draft Report and in comments during the public hearing, there was little indication given of any precise and accurate targeting. The recipients of "Intensive Assistance" appeared to exhibit an ill-defined, vague (and a skeptical observer might suspect, convenient) mix of disadvantage. Sometimes they were described as

"disabled" – although the widely different degrees of employment disadvantage existing within the disabled group appeared to be glossed over – and sometimes as ordinary young people likely to be suffering mainly from the effects of unemployment itself.

(vi) In the Draft Report and in comments during the public hearing, it was suggested that Job Network should concentrate on "intensive assistance" services. "Intensive assistance" services are described only summarily.

(vii) In the Draft Report and in comments during the public hearing, it was asserted that no integrated, programme-wide, government-backed approaches would be needed. This seems to be an assumption based on an ideology of 'hands-off' government, and on a political/religious attachment to decision-making and control as properly lodged away from any centre and in individual independent agencies, rather than on the critical assessments of long-time experts in the field, or on rational, real-world analysis and experience.

(viii) Using the list suggested above, it seems that the roles best characterizing Job Network's present activities are those of "broker" and "case manager". It might well be that the training, backgrounds, personal commitment, and capacity of the staff of Job Network provider organisations are consistent and commensurate with these roles. Comments in the Draft Report and the public hearing strongly suggest that whatever future Job Network has is seen as being in the area of "Intensive Assistance". More critical targeting of the Job Network to the most disadvantaged job-seekers (excluding for the most part the plain disadvantage of being unemployed?) would presumably carry certain organisational and individual requirements. Among those might well be the transforming of tasks and roles from the "broker" and "case manager" levels, to the "advocate" and "mentor" levels. If such were the case, the new tasks, roles, orientation and skills might present serious problems of skill, ethics and commitment to numbers of current management and staff, and therefore to Job Network as a whole. If such a transformation proved impossible to achieve satisfactorily across all providers, any high hopes entertained for radical development of the Intensive Assistance role might prove illusory.

(viii) The Draft Report refers to those people referred or self-referring to Job Network providers as "job-seekers", "customers", "participants" and "clients". As with the terms for the provider personnel noted above, these terms are treated as interchangeable. Their interchangeable use appears to underline the same uncertainty and indeterminacy of status, rights, responsibilities and self-image accorded to citizens in relation to these public-funded private providers of employment placement services.

2. 'MICRO' EXPERIENCES OF JOB-SEEKER

We might imagine the "case" of "K". Let us suppose that "K" has a disability and has sought employment through four Job Network placement agencies, albeit under JPET, over a period of some years. Let us say that Job Network was introduced while "K" was a long-time client of the second of these agencies. Let us say that the relevant aspects of "K's" experiences in these agencies are:

2.1 Experiences:

AGENCY 1:

A small pilot service operated by a state government employment department in its city office; targetted solely at people with disabilities; managed by qualified social worker committed to effecting change in the employment environment in order to accommodate disabled job-seekers, and having experience in the employment field; Agency 1 deals only in full-time employment at award or going rates of pay; Agency 1 uses its departmental auspice (eg. its bona fides as promoter of a humane employment scheme, and as part of a government administration which purchases considerable goods and services from private companies) to encourage employer involvement; Agency 1 staff member learns the job and provide six weeks' on- the-job training and productivity guarantee to each employer.

Let us say that after a few weeks, Agency 1 places "K" in a full-time service industry job (at the award rate) with an employer who has a service contract with another government department; "K's" work, although slow, is deliberate, reliable and meticulous; "K" remains in job for two years until employer relinquishes its contract with the government department (which was, let us say, about to be radically downsized). During this period, Agency 1 closes when Commonwealth assumes control of all government employment placement functions.

Since that time, many workplaces of the kind which employed "K" have, as a matter of company/government policy been altered beyond recognition, as the result of the combined pressures of: businesses' concentration on more profitable activities in this field, reductions in the number of government employees (and hence of privately employed workers providing them with services), transformation of the method of supplying this service, the increased reliance on temporary substitute workers on non-standard conditions (eg. overseas backpackers), the effects of under-employment – with preferred overqualified employees routinely out-competing the less "qualified", and the greater complication and multi-skill demands of jobs in this and similar fields.

Let us say that "K" has had no subsequent employment despite being a client of three further agencies.

AGENCY 2:

A small not-for-profit placement and training agency created by a Christian denomination charity through one of its institutions. Targetted at both disabled and non-disabled job-seekers; let us say that no manager had experience in dealing with, understood, or felt comfortable taking a leading, and positive role with employers. Let

us say that for some years Agency 2 has operated two related businesses. Let us say that in relation to these associated businesses, Agency 2 has acted as recruiter, placement agent, trainer, drummer-up of service contracts for the business, employer, and advertiser/promoter of the business' product. Let us say that over many years, Agency 2 exhibited various conflicts of interest, high staff turnover, management-staff conflict, and complaints concerning financial management.

Let us say that "K", despite consistent attendance two or three times per week over a number of years, was never referred to one actual job. Further, let us say, "K" found that any expression of dissatisfaction or frustration was met with tortuously organised 'conflict resolution' meetings lasting up to two and a half hours, and characterised by a management style seemingly po-faced, befuddled and patronising.

Let us say that when the new funding regime arrived, Agency 2 made it clear that it was not in the position to further assist "K".

AGENCY 3:

Let us say that "K" becomes a client of Agency 3 in a distant suburb. Let us say that "K" is interviewed for an hour and a half by an avuncular officer who shows good understanding and expresses a definite confidence in Agency 3's ability to find employment for "K". At an arranged follow-up interview, "K" is seen by a new person for 8 to 10 minutes, purportedly to 'check details'. Let us say that Agency 3 gets in touch with the manager of Agency 2 on the subject of client "K". Let us say that a third interview was then arranged at which a third officer interviewed 'K' for five minutes. Yet another follow-up meeting was arranged, once again conducted by an officer previously unknown to "K". In marked contrast to the initially interviewing officer, this officer's manner was cool and unencouraging. Let us say that, were it not for questions from "K", this meeting would have taken only very few minutes. In this meeting, Agency 3 declared it would not be able to place "K", unless possibly in work at a reduced wage. The Agency 3 worker could not say whether such work would be casual, part-time or full-time, what the likely pay would be, what the terms and conditions of such employment would be, in what area it would be located, or what type of work would be involved. Let us say that Agency 3's only information about their staff member's suggestion was a photocopied typed sheet specifically directed at prospective employer-clients, and highlighting the attractiveness of low wages to those employers. Agency 3 referred "K" to the local Centrelink office – which not only had no information on such arrangements, but had never heard of them. Following this fifth interview, nothing further was arranged, and "K" heard nothing more from Agency 3.

AGENCY 4:

Let us say that "K" becomes a client of Agency 4, one of a proprietary group of not-for-profit providers. Let us say that "K's" prospects are encouraged, and that "K" is told at the initial interview that Agency 4 will get back to "K" within ten days. Let us say that when three weeks have passed, "K" writes to Agency 4 and is told a future

appointment will be arranged. Let us say that the second meeting, at which "K" notes the presence in the Agency 4 office of two ex-employees of Agency 2, is brief. Let us say that "K" is informed that Agency 4 will contact Agency 2's manager, and that "K" will be subsequently contacted. Let us say that months pass before "K" receives a letter out of the blue from Agency 4 asking if "K" still remains interested in Agency 4's assistance. It seems as if Agency 4's surprisingly worded letter was composed to provide Agency 4's file with the bureaucratically required sense of continuity of contact. Let us say that "K's" affirmative reply is followed by a brief interview. Let us say that nothing more is heard from Agency 4 for a month when "K" receives a letter stating briefly that "K" has been taken off Agency 4's caseload.

Let us say that on no occasion was "K" ever advised of any other means of handling complaints except through complaint-resolution mechanisms internal to the organisations themselves.

Let us say that "K" suffers health problems directly related to "K's" experiences with Agencies 2, 3, and 4, and undergoes medical treatment for these problems.

2.2

Relevance to Draft Report's Recommendations:

- i. An outcome of Draft Report recommendations concerning shorter period of assistance and "Work for the Dole" would appear to be long-term intermittent or continuous periods of "Work for the Dole" for those "Intensive Assistance" job-seekers whom the Job Network provider has failed to place. "K" might see this as the official sanctioning of the poor quality treatment meted out by Agencies 2, 3 and 4, and a proposal aimed at simplifying and sanitising the Job Network system to "K's" disadvantage.
- ii. The Commission's recommendation of an 'enhanced provision of information' (p. 8.9) might create rather than solve difficulties. Let us say that during "K's" involvement with Agencies 2 and 4 the manager changed, and there were significant staff changes. And that there was also staff movement between Agency 2 and 4. It would be likely that, following "K's" positive experience with Agency 1, "K" would have sought access to a *similar* service, a service of a certain uniformity and predictable standard of quality, commitment, orientation, understanding, 'professionalism', approach and skills. Let us say "K's" expectations were dashed not only by low quality providers, but by the very variety of different services of different quality, commitment, approaches, orientations and understanding etc. Consequently, it would be surprising if "K" would regard the proliferation of information about different services as particularly useful, especially as the information would be provided by the different providers themselves. The providers' "selling" themselves to potential job-seeker clients could be seen as embroiling those providers in a conflict of identity (in cases where providers consider themselves to be the agent of potential employers, and the employer to be their primary client – the client to

whom they 'sell' their most easily-finished 'product'.)

In relation to the Centrelink "Streamlined Job Network Access and Referral Process Pilots", a job-seeker might wonder how many other comparable major decisions in life would be properly made at such speed and in such an environment. A person in "K's" position might also consider the occasion on which a self-determining selection of providers 'sell' their wares to be confusing, and as likely to result in the overlooking of a better/more convenient option.

iii) The Draft Report's enquiry re. existing complaints mechanisms (p. 8.15) could draw the following responses. A client might never be aware of any complaints mechanism; A provider can forestall the possibility of complaints firstly by informing clients only about a "dispute resolution mechanism" (organised by the provider, and presided over by a party directly paid by the provider). A provider can foment a 'dispute' rather than identify "complaints". Another office of a same-brand provider might offer a superficial and sympathetic response to a relayed complaint, but proffer no information about the existence of the DEWR Job Network Customer Service Line. Given an awareness that DEWR has no authority to direct an agency to change its policies or procedures, a dissatisfied client might be unlikely to approach its Customer Service Line, even if aware of its existence. If a job-seeker expects both uniform and good quality service across the programme, merely "allowing" Job Network "participants" to change manager and provider might be considered by the job-seeker to be a) an obtuse solution to his/her problems, and b) a counsel of despair and a dismissal/sidelining of his/her complaint.

iii. Draft recommendation 14.1 (p. 14.16) concerning sharing of personal information among providers could, as the result of experiences of the kind noted above, cause justifiable consternation. This consternation might be caused by such factors as: the everyday reality of poor quality provider service; the lack of any institutionalised professional ethics in an activity which deals with a central life experience and has private-sector involvement in state-sanctioned compulsory and punitive action; the lack of a standard professional education/training for the task; the poor quality tertiary training currently provided for this field; high staff turnover, and considerable movement of personnel from provider to provider and from office to office. The light of practical experience gives rise to doubts as to the capacity of some/many provider-organisations or provider-businesses to gather and share valid and reliable information in accordance with professional ethics – Privacy Commissioner protocols notwithstanding. Both the Draft Report and the submission excerpts included emphasise (to the virtual exclusion of other concerns) the efficient handling aspect of personal information disclosure.

Job Network exhibits a clearly intended decentralised location of service, authority

and powers (which the Draft Report sees as essential, and praises as yielding many benefits) to the 'local', individual office level, and away from the centralised authority of a government department. In the absence of such a unified, centralised and organic authority, problems concerning the confidentiality, proliferation, repetitive provision, ethical handling, legal rights and limits of disclosure, as well as storage and transfer of information will inevitably arise. The Draft Report has narrowed its consideration of this to the efficient handling and transfer of information as a commodity or resource by largely independent operators which nevertheless gather, interpret, share and transmit information upon which punitive sanctions are subsequently dispensed by an increasingly remote government department. The draft Report's recommendation appears to entail both a leap of faith in the players' ability to manage and deliver in this field, and a dampening down of concern for the ethical (not just privacy) issues involved.

2. COMMENTS ON DRAFT REPORT AS A WHOLE

*The Draft Report's Introduction opens with a description of unemployment's disintegrating effects on people, society and the economy. The implication is that the Draft Report's Job Network recommendations can be reasonably expected to represent a major labour market policy tool to reduce unemployment and its disintegrating effects. The supply side case is simply asserted (using, it must be said, equivocal, ambiguous and assumption-laden language, eg. "effective labour supply", "in the long run", "determines the level of employment", "puts a limit on", "feasible supply", labour market policy only works", "it cannot fail to have an effect", and again, "in the long run"), and thereafter implicitly relied on. Thereafter, the Draft Report's discussion of unemployment sets the bar for itself at no higher than the level of imperfections in the individuals of the supply, and economical methods of obliterating such imperfections. The powerful list of imperfections is said to include lack of wanted skills, poor motivation, demoralisation, lack of capacity to complete courses, and information poverty. The Draft Report's supply side ideology means that the only use it can find in labour market programmes is their potential for reducing wages in the "lower skill end of the labour market", ie. in already low-wage jobs (p. 2.7). Although far from an acid test, one could only imagine the level of consent which this aim, if clearly put to them, would find in current job-holders and job-seekers of such jobs. Is a 'Plain English' version of the Draft Report available to such groups? The availability to and readership of the Draft Report to these people are no doubt quite low.

*The Draft Report seems to be ideologically unwilling to draw certain kinds of conclusions eg. that in neither design nor in practice is the Job Network actually a network. It seems quite obvious that it is both designed as the opposite of a network and to operate as the opposite of a network (with the possible exception of the transfer of personal/private information). The implications of a situation in which the very principle on which the programme is based and which is a central

concern of the Draft Report - viz. competition – might actually be working against the programme's effective operation seem to have been overlooked. I simply note the Office of the Public Advocate's statement that [there has been] "a decreased focus on organisational networking, information exchange and collaborative processes in an environment characterised by competition". Likely medium term implications (eg. fragmentation, use of resources for purposes based on sect or fundamentalist predilections, isolation, destructive competitive rivalry, masking specific practices from view or aggressively demanding their acceptance, inter-organisational skulduggery in relation to the funding department etc.), decline in skill levels, and decay of ethical standards) for the non-network "network" appear as a consequence to be overlooked in the Draft Report.

*The Draft Report's recommendations give the impression of being based on an ideology simply assumed and insufficiently justified by argument. The main features of the ideology in question are: e-commerce, deregulation, privatisation, austerity plans for the poor, the Market as God, anti-unionism, pro-sweat shops, focus groups, wealth polarisation, and repeal of the welfare state. Suggested evidence for this claim follows below:

- i. The Draft Report's list of a 'range of policy instruments' (p. 2.2) is ideologically selective. It excludes measures such as legislative change, protective measures, the shorter working week, employment requirements for government contractors and suppliers etc. The Draft Report's ideological nature is suggested by its early resorting to a heavy reliance on the ubiquitous "reform"-with all of that word's ideological baggage remaining unpacked (p. 2.2).
- ii. The Draft Report expresses a favourable attitude to research support (which it acknowledges is weak)(P. 2.7) for the expectation that labour market programmes might achieve some reductions in low-paid workers' capacity to bargain for better pay. For the same reason, 'employee protection policies' suffer the Report's implied criticism.
- iii. The Draft Report is inclined, relying on evidence verging on silliness, to put the best construction on ideologically favoured factors, and the worst construction on those to which it is ideologically opposed. It states that "some Job Network providers have given second-hand bicycles or even skateboards to job-seekers for transport to jobs", and that "it is hard to imagine that a directly government-owned provider could offer such in-kind services". (pp. 3.3, 3.4). By contrast, the Draft Report asserts (p. 3.5) that "a potential advantage of contracting out is that it may reduce the ability of certain principals to exert decision-making power in areas where that is not appropriate and discourage them from knee-jerk changes in goals or processes". It seems to assume a reality that is somehow constitutionally primed to support the ideological slant embraced.
- iv. Another ideological bent is apparent in the Draft Report's unquestioning support for the now ubiquitous "flexibility". Its very ubiquity and unavailability

to popular questioning render it no less ideological or relevant. The Draft Report quotes favourably the Salvation Army's assertion (p. 3.9) that "an individually tailored plan of support which allows the flexibility to vary assistance in accordance with emerging needs has proven to be more effective than requiring unemployed people to attend training for the sake of training or simply to fill purchased courses". The fact that this emotion is now part of an unquestioned individualism does not absolve the Report from being aware that such a statement: a) is cast in phrases which appear to render the opposite view unthinkable, but without the bother of justifying it with reasons; b) based on the Report's own conclusions of Job Network's effectiveness, appears to be not in fact the case. c) has its probable ideological origin in the Salvation Army's own theological predilections based around the primacy of individual determination of personal sanctity and spiritual justification and opposition to any centralised control. (In this regard, it appears that the larger Christian denominations eg. Catholicism and Anglicanism - which do *not* have these individualist theologically-based emotional predilections, but favour centralised and essentially group approaches to salvation - are not well-represented among Job Network operators. I do not possess the facts on this, but it seems possible that they might in fact not provide *any* services under the Job Network programme.)

- v. Section 3.5 (p. 3.21) purports to "establish principles where the purchaser-provider model ('versus direct provision') may best apply". If this section is considered to meet the above claim, "establish" would have to mean nothing more than 'assert'. Some of the usual 'neo-liberalisms' lately cemented into the language (eg. "flexibility", "choice", "efficiency") appear to be merely asserted and assumed rather than discussed and argued. The "principles" "established" in these pages appear as if they might be related to an abstract system of internally consistent assertions rather than to the real world of social institutions, social provisions and social relationships. The "principles" of 'definable outcomes', 'reasonably quantifiable' outcomes which can be 'related to the efforts of the provider', and 'written contracts which minimise unintended consequences' – are stated to be established principles which indicate purchaser provider arrangements to be superior to direct provision. Presumably with the bar set at such a low level, such "criteria" would have been met in the case of British Rail. Disenchanted English train travellers' real-world of cancellations, competition-induced bickering, petrified decision-making, train crashes, derailments and multiple deaths might question the real-world value of these "criteria".
- vi. Low validity and reliability of some of the draft Report's instruments is not associated with due reticence in drawing conclusions from them. In spite of admitting that the number of participants attending the Value Creation Workshops was small, the Draft Report accepts the perceptions as "indicating areas of good service and areas for improvement" (p. 6.4). Further, the Draft Report does not alert the reader to the probability that the participants are not

representative of Job Network provider participants.

- vii. The Draft Report's recommendation that the duration of Intensive Assistance be reduced from 12 and 15 months to 6 months (p. 7.1) might also be considered as sharing the ideological bent referred to above. In the absence of any recommendations aimed at improving the programme's essential qualitative elements, it reads as a recommendation directed at 'cutting losses' in a poorly regarded (by the Report and possibly others), poorly targetted employment placement programme of doubtful effectiveness. The recommendation is based on a graph drawn to represent 'interim outcome exits', and on DEWR's own submission concerning activity levels over time. What appears not to have been considered however, are such things as the current internal effects of poor overall targetting in the programme, the different effects on various groups of disadvantaged job-seekers, and any optimum time which better quality services directed at better targetted groups of job-seekers could require. It could also read as a call to 'give up on' the most employment-disadvantaged, and to excise their numbers from unemployment statistics.
- viii. The heavy emphasis placed on "choice" (p. 8.1) confirms what some might consider to be the Draft Report's unduly heavy reliance on "choice" in employment placement programme assessments. In the larger real-world scheme of things, choice might be somewhat less important than the weight of available institutional including government support, the development of social provisions on the basis of government duty and responsibility, and the fostering of unified, service-wide, principled 'professional' relationships based on adequate practitioner training and on ethical, disinterested commitment.
- ix. The recommendations concerning the "scope for extending the Job Network model" (p.p. 15.10 – 15.21) read as essentially relying on the same ideological bent of the Draft Report as a whole. As with other recommendations, they appear to rely on the assertion of, rather than evidence for such things as: according primacy to "choice"; the setting of impossibly high requirements for justifying "direct service" provision; the fact that not all government (eg. Centrelink) services are provided as "direct provision".

* The draft Report's alludes (p. 14.19) to the problem of a Job Network system whose essential organisation militates against the development of best practice services. However, it appears not to make any draft recommendation to overcome what might be seen as a life-threatening cancer in the medium term.

* Given the problem noted in (x) above, and the apparent unavailability of its thoroughly satisfactory solution, the Draft Report's readiness to recommend extending the Job Network model over a broad range of services is a cause for concern. The only hopeful submission is that of The Salvation Army, which opines that "as the new employment service sector matures there appears to be a greater degree of contact and sharing between employment service providers". With The Salvation Army operating scores of provider agencies throughout Australia, one might

wonder whether, given the current predilection for privatised service-provision, best practice would be most effectively disseminated in this area if The Salvation Army were to operate every employment agency in the land.

* The Draft Report's presentation and discussion of the "Scope for extending the Job Network Model" is thin, brief and appears ideologically driven. The implications of a number of serious issues and problems raised either in submissions or in the Report's own text appear to have been ignored. Instead, a few very low hurdles are set for any privatising proposal to clear.

* The Draft Report shows commitment to and a detailed concern for the privatised job-placement industry, the means of reducing problems inherent in the 'virtual' status of competition applying within it, methods of pricing it with public funds, and the locating of its functions within an ideological commitment to e-commerce, deregulation, privatisation, austerity plans for the poor, the Market as God, anti-unionism, pro sweat shops, focus groups, wealth polarisation and repeal of the welfare state. By contrast, the Draft Report detailed knowledge of, commitment to and concern for unemployed workers seeking decent employment are much less obvious. Avoidance of the consideration of structural factors and solutions is combined with an unconcern with any employment-destroying effects of the very ideological elements assumed and espoused.

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