

Operational Guidelines

Digital Work and Study Service July 2024

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Preface

The Australian Government Department of Social Services (the department) has a suite of program guidelines, which provide information about each grant funded program. They are the key starting point for parties considering whether to participate in a program and form the basis for the business relationship between the department and the grant recipient.

The Operational Guidelines will assist headspace National Youth Mental Health Foundation (headspace National) to deliver the Australian Government Digital Work and Study Service (DWSS) and the Career Mentoring Service and contribute to Outcome 3 – Disability and Carers under Program 3.1 – Disability and Carers of the departments Portfolio Budget Statement.

It is the responsibility of the provider to ensure they are familiar with the content and requirements of these Operational Guidelines.

The Operational Guidelines should be read in conjunction with the:

- Grant Agreement (including Schedule 1)
- Grant Opportunity Guidelines and
- Data Exchange Protocols (for Commonwealth Agencies with program guidance).

The Operational Guidelines include:

- the purpose of DWSS and Career Mentoring Service
- the role and expectations of headspace National as the provider; and
- information pertinent to the successful delivery of DWSS and the Career Mentoring Service.

The Operational Guidelines are a living document. As additional issues arise and policy clarifications are developed, updates will be made to the guidelines. The department reserves the right to amend the Operational Guidelines, by whatever means it may determine in its absolute discretion and will provide reasonable notice of these amendments.

Further Information about the programs

Funding Arrangement Managers (FAM) are the first point of call for contact with the department. They assist with queries relating to the administration of grant agreements, delivery of services, data and reporting, or any new issues that arise under these Operational Guidelines.

The Community Grants Hub can provide FAM contact details via:

- telephone on 1800 020 283 (option 1)
- email to support@communitygrants.gov.au.

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1. Digital Work and Study Service (DWSS)

1.1 Objective of the DWSS

The objective of the DWSS, also referred to as work and study online, is to improve the mental health of young people aged 15 to 25 years by delivering integrated clinical and vocational employment and educational support via a digital platform.

The DWSS aims to:

- complement the intent of the Individual Placement and Support (IPS) program by increasing access to work and study services nationally
- deliver integrated clinical and vocational assistance and mentoring via a digital platform to achieve and maintain sustainable participation in competitive employment or vocational education
- reduce the risk of young people disengaging from employment or education and risk long-term welfare dependency
- provide mental health and vocational support that aligns with relevant state/territory standards, guidelines and protocols.

1.2 Overview of the DWSS

headspace National, as the DWSS service provider, engage Work and Study Specialists and Clinical Advisors to deliver DWSS.

Work and Study Specialists, located across Australia, support young people by providing appointment-based sessions via webchat, video conferencing or phone. Support provided is cost-free and confidential with young people generally engaged with the service for 3 months.

DWSS Clinical Advisors work in tandem with Work and Study Specialists, supporting young people to manage their mental health and addressing barriers to attaining and maintaining work and study.

The DWSS supports young people to:

- have an understanding of, and a plan to reach, their work and study goals
- develop skills and abilities to independently gain and maintain their work and study goals
- have an understanding and ability to manage vocational and non-vocational barriers that impact their capacity to achieve their work and study goals
- increase their sense of self-efficacy and independence in managing their work and study situation
- increase their level of social engagement, wellbeing, and hope
- improve their financial wellbeing, to prevent or reduce reliance on government welfare benefits.

1.3 Access to the DWSS

A young person can access DWSS through self-referral or by referral from a headspace clinician or IPS Vocational Specialist located in a headspace centre.

Priority access to DWSS will be given to First Nations young peoples and culturally appropriate support will be provided.

To be eligible to receive DWSS support, a young person must:

- have mental ill heath and be aged from 15 to 25 years

- have employment, education or training goals and be facing barriers to achieving these goals
- be willing to participate in the service and able to make an informed decision to participate.

2. Service Delivery

2.1 DWSS services to be delivered

The role of the DWSS provider is to contribute to the DWSS objective and deliver services in line with the requirements in these guidelines and align with, adhere to, or comply with the requirements under the following:

- Principles outlined in the National Safety and Quality Digital Mental Health Standards at http://www.safetyandquality.gov.au)
- Principles outlined in National Standards for Mental Health Services 2010 (available at www.health.gov.au).
- Principles outlined in National Practice Standards for the Mental Health Workforce 2013 (available at www.health.gov.au).
- National Safety and Quality Health Service Standards available at http://www.safetyandquality.gov.au)
- Principles outlined in the Child Safe Framework (available at www.childsafety.pmc.gov.au) and the department's Child Safe Compliance process (https://www.dss.gov.au/child-safety-for-dss-funded-organisations).

- DWSS Principles:

- Personalised service
- Clinical integration
- Voluntary participation
- Strengths based
- Accessible service.

DWSS support may be provided in addition to existing vocational or educational assistance already being provided to young people through other funding arrangements, however DWSS must not be delivered to participants already receiving support through the IPS program.

2.2 DWSS Work and Study Specialist

DWSS Work and Study Specialists are suitably qualified professionals who have experience in helping people find and keep competitive employment or study placements, consistent with their capabilities, interests, and vocational goals. Work and Study Specialists will have the capacity to manage caseloads of people with mental ill health, particularly in liaising with clinical treatment teams, families, and employers to achieve positive outcomes for participants.

Ideally, specialists will understand the issues impacting young people with mental ill health, combined with an interest in the youth mental health field.

Services delivered by the Work and Study Specialists include:

- career planning, job searching, application/enrolment assistance and interview techniques
- collaboration with Work and Study Online Clinical Advisors
- assistance to navigate community support services and use Centrelink systems

^{*}Note: A formal diagnosis of mental illness is not required to access DWSS support.

- provide post placement support to the young person for up to 6 months, after their initial episode of care, and
- liaise with employers and education and training providers to facilitate new opportunities based on the young person's choice.

The Work and Study Specialist will work closely with the DWSS clinical team if required, to:

- implement time-sensitive consultations
- coordinate services to ensure roles are complementary
- ensure the clinical team is aware of the participant's goals and plans
- ensure appropriate referrals are made and post placement support is provided.

DWSS will also engage First Nations Work and Study Specialists to provide culturally appropriate support to First Nations young peoples who are experiencing mental ill health to address barriers to attaining and maintaining work and study goals.

2.3 DWSS Clinical Advisors

DWSS Clinical Advisors are suitably qualified mental health clinicians who have experience in supporting young people with mental health difficulties.

DWSS Clinical Advisors will:

- provide mental health interventions and support directly to young people who are accessing DWSS
- work closely with and provide consultations to Work and Study Specialists to develop a planned approach to service delivery
- respond to clinical escalations when a young person has been identified as being at risk
- liaise with existing clinical teams, service providers, and families to achieve positive outcomes for young people.

2.4 Career Mentoring Service

The online Career Mentoring Service connects young Australians, aged 18 to 25 years, with a working professional to support them to obtain their career goals. The Career Mentoring service is free of charge to the participating young people.

The service is part of headspace National's Vocational Services and has access to senior clinical staff, including the National Manager of Work and Study Online, a Clinical Coordinator and 5 Clinical Advisors.

A young person can access the service by self-referral through the headspace centre network or through a DWSS Work and Study Specialist or IPS Vocational Specialist at a headspace centre.

The aim of the service is to support young people to build successful and fulfilling careers by:

- engaging with a mentor through fortnightly sessions online for up to 6 months
- gaining workplace and industry insights to support career decision making
- developing professional connections
- developing accountability and independence when engaging with employers
- supporting confidence and optimism about their future and navigating career paths
- fostering connection with trusted allies to reduce isolation.

To be eligible to receive career mentoring support, a participant must be:

- 18 to 25 years of age and have clear career goals to work on with a mentor
- willing to participate in the service and be able to make an informed decision to participate
- able to independently engage with a volunteer, online, for up to 6 months.

If the mentor and young person choose to continue their professional mentorship after 6 months, both parties must agree to do so and set appropriate boundaries of communication.

The Career Mentoring Service will be delivered in line with all relevant requirements in the DWSS Grant Agreement and these Operational Guidelines.

Complaints handling

The headspace Feedback Management Policy outlines the principles for managing feedback and complaints and adheres to the headspace Clinical Governance Framework, policies, and procedures.

Young people are provided with the feedback process in their service terms and conditions, which are discussed at commencement. Pathways to provide feedback include the headspace Service Feedback Form on the website, a direct contact number and email address.

Mentors can provide continuous feedback through a post-training survey, the end of session form (completed after each mentoring session) and the mentor closure form (completed at the end of each mentoring relationship). A direct email address and contact number is provided to mentors to enable continuous feedback and service improvement opportunities.

In addition to complying with these complaints and feedback process, the service provider must comply with requirements in Sections 2.14 Incident Notification and 3 Handling Complaints of these guidelines.

Volunteer Mentor

Mentors are working professionals who volunteer to directly deliver mentoring sessions to suitable young people. They undergo extensive recruitment and credentialling to equip them with the practical skills to mentor young people, including mental health literacy and having supportive conversations. Potential volunteer mentors must:

- submit an online application that includes primary motivations for program participation and previous experience
- undertake a video interview with headspace service staff
- successfully obtain a National Police Record Check and Working with Children Check for the mentor's home state or territory
- provide 2 professional reference checks (ideally by previous or current managers)
- adequately complete headspace Mentor Skills and Supportive Conversations training modules (approx. 8 hours), facilitated by the headspace vocational clinical team.

Mentoring Specialist

The headspace mentoring team support young people and mentors throughout their mentoring relationship and will:

- receive the referral and speak to the young person to understand their vocational goals and requirements
- provide mentor matches to a young person, who can then accept or decline the offer
- undertake an introductory mentoring session with the mentor and young person
- facilitate access to a suite of headspace mentoring and wellbeing resources and access to clinical support to guide the relationship.

The mentoring team will undertake key milestone check-ins with the mentor and young person at commencement, after 3 months and at closure and will undertake a closure interview with the young person. Key outcomes reported on are:

- activities completed during mentorship such as job search and interviews
- employment outcomes and volunteer work or paid internships
- better understanding of industry and career options
- career confidence and optimism.

Mentoring Specialists will liaise with DWSS Work and Study Online Specialists if a young person has been referred and liaise with Clinical Advisors for consultations, escalations, and provide support after critical incidents.

2.5 Cultural Competency

Cultural competency is the ability to interact effectively with people across different cultures. It has 4 main components:

- being aware of one's own cultural worldview (one's own assumptions and biases that could affect decision making and actions)
- having a positive, respectful, and accepting attitude towards cultural differences
- having knowledge of different cultural practices and world views
- having good cross-cultural communication skills.

A culturally competent person can communicate sensitively and effectively with people who have different languages, cultures, religions, genders, ethnicities, disabilities, socio-economic backgrounds, ages, and sexualities. Culturally competent staff strive to provide services that are consistent with a person's needs and values.

The DWSS provider needs to ensure that:

- cultural competency is embedded in their philosophy, mission statement, policies and the key objectives of DWSS service delivery
- they have a strong understanding of the cultural profile of participant cohorts and culturally and linguistically appropriate team members are employed
- a First Nations Work and Study Specialist is engaged to provide culturally appropriate support to First National young people
- cultural competency resources are readily available to DWSS employees in the workplace
- DWSS employees are encouraged to be flexible in their approach and seek information on specific cultural behaviours or understandings
- DWSS employees receive appropriate training for cultural competence.

In delivering culturally competent services, the DWSS provider should:

- seek to identify and understand the needs of specific special needs groups accessing the service
- investigate, understand, and consider a participant's beliefs, practices or other culture-related factors in designing services
- always be respectful of a participant's cultural beliefs and values

- ensure that the online environment and practices are culturally inviting and helpful for DWSS employees and participants
- the physical environment and practices are culturally inviting and helpful to DWSS employees
- ensure that services are flexible and adapted to take account of the needs of specific special needs groups and individual participants
- provide access to culturally specific training and supports to improve team understanding of the local community groups and effective communication methods
- regularly monitor and evaluate cultural competence of the service and staff (including obtaining input from participants and the community)
- use information and data about specific special needs groups to inform planning, policy development, service delivery, operations, and implementation of services.

2.6 Caseloads, duration, and intensity of support

The approach to service duration and intensity of support must be consistent with requirements detailed in **Section 2.1 Services to be delivered**. While there is a high level of flexibility, the DWSS is premised on the provision of *individualised* assistance tailored to each participant's preferences, choices, and goals.

To meet the intent of the DWSS, a Work and Study Specialist and DWSS Clinical Advisor should have a caseload structure that facilitates the maintenance of high-quality service delivery aligned with the intent of the DWSS:

- full time Work and Study Specialists have a case load of up to 25 young people at any one time, and
- full time Clinical Advisors have the capacity for up to 10 clinical appointments a week with young people. This can be a mix of one off as well as ongoing appointments for the duration that the young person is in the service.

Support of DWSS participants is not time limited. A flexible and sophisticated approach should be taken when determining the duration of support a young person may require in an online environment.

2.7 Links and working with other agencies and services

To achieve the best outcomes for participants, DWSS should complement and intersect with other services including clinical and non-clinical mental health services, community services, other employment services and employers. This approach is designed to build on existing arrangements and ensure services are coordinated to provide holistic and flexible support.

Th DWSS provider is expected to form partnerships and establish formal links with a range of networks, services, and other stakeholders, which may include:

- developing referral processes and managing referrals to other support services required by the young person
- participating in care collaboration and inter-agency meetings when appropriate, and
- negotiate parallel servicing arrangements where participants are already receiving assistance from employment service providers, including Disability Employment Services (DES) or Workforce Australia.

Undertaking these activities can take the form of Work and Study Specialist (with the young person's consent) emailing and phoning other service providers to ensure roles and responsibilities are clear,

vital information is shared, services provided align and don't duplicate and that the young person's goals are clear and being met.

2.8 Evaluation

The DWSS provider is required to actively participate in evaluations of the service, which may include providing data and information on its effectiveness, efficiency and outcomes to the department or external evaluator.

2.9 Compliance with Relevant Legislation

The DWSS provider is required to deliver services in accordance with relevant legislation and industry standards, including relevant legislation regarding police checks for staff working with children and vulnerable persons.

The DWSS provider should be aware of any case-based law that may apply or has an effect on their service delivery. They must ensure that the services meet health and safety requirements and all licence, certification and/or registration requirements in the area in which they are providing services.

2.10 Service development and improvement

The provider must regularly review and revise their service delivery practices to meet the needs of participants and ensure that:

- participants are aware of the procedure for complaints handling
- participants are encouraged to raise, and have resolved without fear of retribution, any issues, dissatisfaction, complaints or disputes they may have about the provider or the service they receive
- complaints and feedback are taken seriously by the DWSS provider, and are investigated, addressed, and used to improve ongoing services.

More information about complaints can be found in Section 3.

The DWSS provider must:

- have quality management and financial systems in place to ensure standards of service and optimal outcomes for participants are met
- foster a flexible and learning culture to ensure improved outcomes for participants
- understand the community and environment they service
- identify and address any issues and risks that might impact on service delivery
- have mechanisms in place to plan future service delivery and set objectives or goals to improve service delivery
- have strong and effective leadership to provide strategic direction, uphold, and exemplify the DWSS values and standards.

2.11 Confidentiality and Privacy

The department expects providers to meet their obligations under the *Privacy Act 1988*, the Australian Privacy Principles and any other relevant state or territory legislation.

The DWSS provider will have access to personal and sensitive information. Personal information should only be shared with other support services with the consent of participants and should be kept safe and secure from access by others. It is critical the provider understands and adheres to privacy and confidentiality obligations.

The DWSS provider will recognise and respect each participant's right to privacy, dignity and confidentiality in all aspects of life.

The participant can expect the DWSS provider to:

- comply with the *Privacy Act 1988* to protect and respect the rights of individual service recipients
- only collect necessary information and use it for the purpose for which it was collected. Information is only released with the written consent of the participant
- promote tolerance and respect for each participant's personal needs and circumstances
- ensure the protection of information and data from unauthorised access or revision, so that the information or data is not compromised through corruption or falsification
- store information and records in a secure place and disposes of them in an appropriate manner.

If the DWSS provider suspects a privacy incident has occurred, the incident must be reported to the department no more than one business day after the date of the privacy incident occurring. The Privacy Incident Management Fact Sheet is at **Attachment A** and the Provider Privacy Incident Report is at **Attachment B**.

2.12 Consent

The DWSS provider is required to gain consent from each participant for the collection of personal and/or sensitive information, and for the disclosure of this information, including (as a minimum):

- de-identified participant data/information disclosed to their organisation
- the release of de-identified participant data/information to the department, and other organisations appointed by the department, for the purposes of monitoring, reporting, research, and evaluation of the DWSS
- the release of participant data/information to other organisations (if relevant).

A consent form will be provided to the participant when an appointment has been booked. At the first appointment, the Work and Study Specialist will verify that the participant received the consent form and will ask for verbal consent. Consent will then be documented in the DWSS data platform.

2.13 What participants can expect

Participants can expect to receive individually tailored specialist vocational and employment support and clinical support where required, delivered in tandem, with existing clinical mental health treatment where relevant, and consent is provided. The support provided will be individualised and via a digital platform through web chat, video conferencing, and phone.

Participants receiving DWSS support can expect to be provided with innovative and needs based interventions to assist them in reaching their work and education goals. To achieve this, the Work and Study Specialists and Clinical Advisor will:

- engage with education providers for enrolment support
- engage employers to support access and maintaining work opportunities
- collaborate with external service providers to improve a young person's wellbeing and independence
- undertake care collaboration with mental health providers to ensure appropriate support for participants

- support young people in their disclosure and adjustments required at work or study
- provide access to high quality vocational resources and engagement tools through the headspace website and headspace account
- provide the opportunity to participate in industry based mock interviews.

Participants can expect respect, trust and understanding. Each participant will be supported to feel welcome, valued and treated with respect, dignity and understanding as a unique person. To achieve this, the DWSS provider will:

- have knowledge and understanding of mental illness and the impacts it has on young people's behaviours and lives
- engage professional Work and Study Specialists and clinicians who are able to build meaningful relationships with participants based on openness and trust
- take all practical and appropriate steps to prevent abuse and neglect of participants and to uphold participant legal and human rights.

Fees

All support provided through DWSS will be free of any charge for young people and employers or education providers.

Participant's rights and responsibilities

Rights:

- that services are delivered in accordance with the requirements in **Section 2.1 DWSS** services to be delivered.
- receive services appropriate to their needs in a safe and healthy environment.

Responsibilities:

- Participants have a responsibility to provide accurate information about their needs and circumstances so they can receive quality services
- are required to comply with the rules and regulations for engaging with services, and
- behave in a manner that does not compromise the health and safety or privacy of others.

Exiting a service

Participation is voluntary and participants may exit the service when they choose or as agreed with the DWSS provider. Exiting participants may be asked to provide information on the reasons for exiting the service.

2.14 Incident notification

Providers must comply with relevant Commonwealth and state and territory laws if there is an incident in relation to delivering the DWSS.

Incident reporting can also contribute to service improvement through analysis of incidents to inform the implementation of preventative measures and responses to adverse events.

Reportable incident notification

A reportable incident includes:

- the death of a client (regardless of cause)
- serious injury of a client

- abuse or neglect of a client
- unlawful sexual or physical contact with, or assault of, a client
- sexual misconduct committed against, or in the presence of, a client, including grooming of the person for sexual activity
- the use of a restrictive practice in relation to a client, other than where the use is in accordance with an authorisation (however described) of a State or Territory in relation to the person.

The DWSS provider must notify their Funding Arrangement Manager of any reportable incident within 24 hours of personnel becoming aware of a reportable incident or allegation, using the Incident Notification Form at **Attachment C**. Updates should be provided within five days. Information supplied to the department should be de-identified.

Serious incident notification

A serious incident is an event that disrupts service provision or threatens the safety of people or property. Examples of serious incidents include:

- incidents involving fraud (including allegations) or misuse of DWSS funding
- incidents of alleged physical or sexual assault of a client committed by an employee
- incidents of alleged physical or sexual assault of a client committed by another client while in the care of the provider
- death, injury, or abuse of staff/volunteers undertaking delivery of DWSS
- significant damage to, or destruction of property impacting service delivery
- adverse community reaction to DWSS activities
- negative media coverage that may adversely impact the delivery of services to participants or the reputation of the department.

The DWSS provider must notify their Funding Arrangement Manager of any serious incident, particularly where they affect services to clients or a client's wellbeing, within 72 hours of personnel becoming aware of a serious incident, using the Incident Notification Form at Attachment C.

Updates should be provided within five days.

Information supplied to the department should be de-identified.

3. Handling Complaints

3.1 Complaints about the DWSS provider

Complaints, queries, and feedback are considered a valuable opportunity for providers and the department to review and improve processes and the quality of services provided. A complaint is defined as: "Any expression of dissatisfaction with a product or service offered or provided".

Complaints are to be treated professionally and in a positive, timely and fair way. In the first instance, complaints (from participants or others) should be directed to the provider. The DWSS

provider should attempt to resolve the complaint amicably in accordance with their internal complaints resolution process and policies.

The DWSS provider must have an Internal Complaints Procedure (ICP) in place, and participants must be made aware of the avenues available to them to make a complaint, such as, in person, in writing, over the phone, and via email.

The ICP should respect the participant's confidentiality for issues to be raised in a constructive and safe way without any fear of their issues affecting the support or assistance they receive.

A formal register of complaints should be maintained and must be provided to the department if requested. The register will include the following information as a minimum:

- the complaint received, including the nature of the complaint and actions taken to resolve the participant's issues and concerns
- how the complaint was resolved, including whether it was referred to another authority.

The DWSS provider should handle most complaints in the first instance; however, particular complaints will require an external referral. These may be complaints of a serious or sensitive nature that cannot be handled by the DWSS provider, or where a satisfactory resolution is not reached through the organisation's internal complaints system. For example, allegations of assault or abuse and neglect should be referred to police.

The DWSS provider must immediately notify their Funding Arrangement Manager about serious complaints, that is, those related to serious harm or misconduct, or serious injury to a client, and keep their Funding Arrangement Manager informed of developments.

3.2 Complaints about the Department

Where there is a complaint about the department made to the DWSS provider, the person should be directed to contact the department's Feedback Coordination Team.

Any member of the public who is dissatisfied with the department or the service of a department funded provider can make a complaint. The Feedback Coordination Team handles complaints about:

- unreasonable delay
- inadequate service, explanation, or reasons
- legal error
- factual error in decision making process
- human error
- procedural deficiency
- unprofessional behaviour by an officer
- breach of duty/misconduct by an officer
- discriminatory action or decision
- flawed administrative process
- inadequate knowledge/training of staff.

As the purpose of the system is to assist in improving the department's processes, the system does not handle complaints about government policy, legislation, reviews over eligibility for a benefit or entitlement, ministerial correspondence, Freedom of Information requests, or complaints made to service providers (as these will be covered by their own complaints mechanisms required under the Grant Agreement).

Complaints can be lodged with the department through the following mechanisms:

Phone: 1800 634 035

Email: complaints@dss.gov.au

Post: DSS Feedback, PO Box 9820, Canberra, ACT, 2601

If participants or providers are dissatisfied at any time with the department's handling of their complaint, they can also contact the Commonwealth Ombudsman at www.ombudsman.gov.au

4. Funding for the Activity

4.1 Eligible grant activities

Funding must only be used for the purposes for which it was provided. The Grant Agreement Terms and Conditions provides further definitions of eligible items at Section 21. Definitions. Funding provided to deliver DWSS may be used for:

- staff salaries and on-costs, which can be directly attributed to the provision of the DWSS as per the Grant Agreement
- employee training for paid and unpaid staff, that is relevant, appropriate and in line with the delivery of the DWSS
- engaging people or organisations with relevant expertise to ensure organisational capacity to deliver services (that it, measurement of fidelity, research and evaluation, as appropriate)
- operating and administration expenses directly related to the delivery of services such as:
 - materials and equipment directly relating to service delivery
 - marketing of services, including electronic promotion of services
 - telephones
 - rent and outgoings
 - computer/IT/website/software
 - insurance
 - utilities
 - postage
 - stationery and printing
 - accounting and auditing
 - travel/accommodation costs, and
 - assets as defined in Grant Agreement Terms and Conditions that can be reasonably attributed to meeting agreement deliverables.

The Grant Agreement Terms and Conditions outline how funds must be spent, acquitted and repaid (if necessary).

4.2 Ineligible grant activities

The grant funding may not be used for:

- the purchase of land
- costs that are not directly related to the provision of the DWSS
- purchase of goods and services for participants, for example, paying participants medical bills or accommodation costs
- major construction/capital works
- funding to cover retrospective costs
- costs incurred in the preparation of a funding application or related documentation
- overseas travel
- activities for which other Commonwealth, state, territory or local government bodies have primary responsibility.

The DWSS provider should contact their Funding Arrangement Manager if they are unsure whether an expense is eligible or ineligible.

4.3 Service agreements for brokering / subcontracting services

The department considers any parts of the activity not directly delivered by the grant recipient and are instead delivered by a third party, pursuant to an agreement between the grant recipient and the third party, to be subcontracting. Examples of agreements between the grant recipient and the third party which the department considers to be subcontracts include:

- operating as a consortium
- brokerage arrangements
- fee for service arrangements
- memoranda of understanding.

The provider using the services of a subcontractor must ensure that all services delivered by the subcontractor are in line with the Grant Agreement, these Guidelines and prescribed on the provider's approved fee schedule.

In line with the Grant Agreement, the department must provide prior written consent before a provider enters into any subcontracting arrangement, and the department may impose any conditions it considers reasonable and appropriate when giving consent. The department may request a copy of the agreement between the provider and the subcontractor.

Reporting requirements for subcontracted services is the responsibility of the provider that the department has the Grant Agreement with, unless otherwise agreed by the department.

The DWSS provider must seek prior written consent from the department before entering into any subcontracting arrangement by contacting their Funding Arrangement Manager. The DWSS provider should provide the details of the subcontractor, as well as what services the subcontractor will be providing. Details include:

- legal name of the organisation or individual, and any trading names
- Australian Business Number (ABN)
- full name of the head of the organisation
- address
- contact details
- schedule of fees

The DWSS provider must also notify their Funding Arrangement Manager if subcontracting arrangements change.

4.4 Financial Reporting

Providers must ensure the efficient and effective use of public monies, that will be consistent with the grant agreement, aims to maintain viable services and act to prevent fraud upon the Commonwealth.

Financial acquittal reports

Financial acquittal documents must include a financial acquittal report certified by the CEO, Board or authorised officer. A financial acquittal report will verify that the grant was spent in accordance with the Grant Agreement and will declare unspent funds.

The DWSS provider will also be responsible for:

- meeting the terms and conditions of the Grant Agreement and managing the grant activity efficiently and effectively
- complying with record keeping, reporting and acquittal requirements as set out in the Grant Agreement.

5. Communication and Promotion

headspace National, the DWSS provider, has developed an overarching 'Work and Study' sub brand, which includes both DWSS and the IPS program. headspace National is encouraged to refer to, and promote, the service, principles and model in marketing material.

A description of DWSS should be included on the provider's website and the following wording used to acknowledge the financial support of the department in all DWSS material published by provider:

Funded by the Australian Government Department of Social Services.

6. Performance and Reporting

The DWSS provider must meet their data collection and reporting obligations as outlined in their Grant Agreement, including the submission of reports. The DWSS provider must have information technology systems in place to allow them to meet their data collection and reporting obligations outlined in their grant conditions. Reporting obligations include the submission of:

- financial reports
- Activity Work Plan reports
- progress reports, and
- final report.

The amount of detail provided in each report should be relative to the size and complexity of the grant and the grant amount. The provider must inform their Funding Arrangement Manager of any reporting delays as soon as they become aware of them.

The department will monitor progress by assessing reports submitted by the DWSS provider and may request records to confirm details of the reports if necessary. Occasionally the department may need to re-examine claims, ask for more information, or request an independent audit of claims and payments.

6.1 Activity Work Plan

The DWSS provider will work with the department to complete an Activity Work Plan on the template provided by the department. An Activity Work Plan will outline the specific grant requirements. The Activity Work Plan will document planned deliverables, milestones, and outputs for the funded project as well as risk management and community engagement relevant to the funded project.

Provider's progress of outcomes, including outcomes for the Career Mentoring Service, will be monitored against the Activity Work Plan throughout the grant activity through regular reports.

6.2 Activity Work Plan Progress reports

Progress reports must:

- include evidence of progress toward completion of agreed activities and outcomes
- show the total eligible expenditure incurred to date; and
- be submitted by the report due date (reports can be submitted ahead of time if relevant activities have been completed).

A 6-monthly Tableau report on DWSS program outcomes and data will also be provide to the department as detailed in the Activity Work Plan.

6.3 Final report

When the activity is complete, a final report must be submitted.

The final report must:

- identify if and how outcomes have been achieved
- include the agreed evidence as specified in the Grant Agreement
- identify the total eligible expenditure incurred; and
- be submitted by the due date and in the format provided in the Grant Agreement.

6.4 Data Exchange (DEX) reporting

The DWSS provider is expected to collect DWSS participant data in line with the requirements in the Grant Agreement, Activity Work Plan, DEX Protocols, and the DWSS Program Specific Guidance.

headspace National, as the program manager, provides the required data via a system-to-system transfer to the department's DEX system.

System to system transfers and bulk file upload of data into DEX are approved mechanisms outlined in the DEX Protocols. By entering the required data into DH, headspace National's DWSS data collection system, grant agreement reporting obligations are being met.

Partnership Approach

Participation in the 'partnership approach' under the Data Exchange is a requirement of funding. By participating, the DWSS provider agrees to provide some additional information in exchange for the receipt of regular and relevant reports.

The provider is encouraged to collect the Standard Client/Community Outcome Reporting (SCORE) information for as many participants as practical, noting the DWSS provider must take into consideration the vulnerability of participants when gathering the information used for SCORE, including whether gathering the information will cause harm to the participant.

The priority for gathering the data is to get an accurate reflection of where the person is at, which may include a negative or no progress outcome. Due to the nature of mental ill health and the journey of individuals, the department recognises that this does not necessarily mean failure of the services.

DEX has two standardised 6-monthly performance reporting periods each year, which run from 1 July to 31 December and from 1 January to 30 June, with a 30-day close off period after each of these. No further changes can be made to the data once the close-off period is completed.

Further information on training and resources available about DEX is included at **Attachment D**.

Data Quality Checks

The providers are expected to undertake checks to ensure the accuracy of the data collected, and to troubleshoot any discrepancies or inconsistencies with the data, such as:

- looking at missing information, for example looking at nil, zero or unknown entries where there should be data
- looking at the minimum and maximum values of the data to find out if values are within the correct range
- checking to see that fields add up to the totals indicated, and
- reviewing comparative data, for example, previous months, to ascertain if the amount exceeds or falls short of expectations.

Access to the Data Exchange

If required, the DWSS provider should ensure appropriate personnel have a DEX user account. This is required to access DEX.

Before requesting a DEX user account, your organisation must be registered with Relationship Authorisation Manager (RAM), and individuals (the appropriate personnel) must have a myGovID account.

- Instructions for registering organisations with RAM can be found at the Relationship Authorisation Manager website (see details below) and include:
 - · Getting your digital identity
 - · Setting up your business, and
 - Authorising others to act online for your business.
- Instructions for setting up a myGovID account can be found on the myGovID website.
 - Once individuals have a myGovID account, they can fill in the Data Exchange System
 User Access Request Form at the DEX website, submit the form to their manager for
 approval, then submit it to the Data Exchange for processing (remember, organisations
 must be registered with RAM before requesting access to the Data Exchange).

If you have questions about DEX, myGovID or RAM, you may find the following useful:

- Data Exchange Helpdesk

Email: dssdataexchange.helpdesk@dss.gov.au

Phone: 1800 020 283 (between 08.30am–5.30pm Monday to Friday)

Website: dex.dss.gov.au

- myGovID

Website: www.mygovid.gov.au

- RAM

Website: info.authorisationmanager.gov.au

7. Document versions

Version	Date	Description	Author
v1.0	October 2023	Draft DWSS Operational Guidelines	DES and IPS Policy and Communications
v2.0	January 2024	Draft DWSS Operational Guidelines	DES and IPS Policy and Communications
v3.0	March 2024	Draft DWSS Operational Guidelines	DES and IPS Policy and Communications
v4.0	July 2024	Draft DWSS Operational Guidelines	IPS Policy and Program Management

8. Glossary

Term	Definition or use
Access	Australian Government policy is aimed at ensuring that government services: • are available to everyone who is entitled to them • are free of discrimination including discrimination of a person's country of birth, language, gender, disability, culture, race or religion • consider the needs and differences of clients
Brokerage	When a service provider pays for the services or goods of another organisation or individual to assist a client with particular needs. Brokerage is considered a form of subcontracting.
Career Mentoring Service provider	The organisation funded by the Australian Government to provide the service in accordance with an executed grant agreement.
Caseload	The number of participants that each Work and Study Specialist, Clinical Advisor or Mentoring Specialist may be providing support to at any given time.
Cultural Competence	The ability to interact effectively with people of different cultures, particularly in the context of non-profit organisations and government agencies whose employees work with persons from different cultural/ethnic backgrounds.
Data	Information collected for a specific purpose.
Data Exchange (DEX)	The Data Exchange is the program performance reporting solution developed by the Department of Social Services in consultation with organisations and clients, in response to the Australian Government's commitment to empower civil society organisations. For more information visit the Data Exchange website at dex.dss.gov.au
DWSS	DWSS delivers integrated clinical and vocational assistance via a digital platform to young people aged 15 to 25 years with mental ill health to achieve and maintain sustainable participation in competitive employment or vocational education.
DWSS service provider	The organisation funded by the Australian Government to provide the DWSS in accordance with an executed grant agreement.
DWSS Work and Study Specialist	A specialist employed to assist young people with mental ill health who are willing to engage with employment services or educational training and take part in the DWSS.
DWSS Clinical Advisor	A specialist employed to assist young people with mental ill health who are willing to engage with employment services or educational training and take part in the DWSS and who require clinical mental health support.
Funding	Public money given to a service provider delivering the service outlined in the grant agreement and including interest earned on the money.
Funding Arrangement Manager (FAM)	The departmental officer responsible for the ongoing management of the grantee (the DWSS provider) and their compliance with the Grant Agreement.

Term	Definition or use
Grant	An arrangement for the provision of financial assistance by the Commonwealth or on behalf of the Commonwealth:
	Under which relevant money or other Commonwealth Resource Fund money is to be paid to a grantee other than the Commonwealth
	Which is intended to help address one or more of the Australian Government's policy outcomes while assisting the grantee achieve its objectives.
Grant agreement	The legal contract between the Department and the auspice body/service provider that outlines service delivery, accountability and reporting requirements.
Mental health	A state of wellbeing in which an individual realises their own potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to contribute to their own community.
Mental illness	A diagnosable disorder that significantly interferes with an individual's cognitive, emotional, or social abilities. Under this program, participants do not require a formal diagnosis.
Mentor	A working professional who volunteers to directly deliver mentoring sessions to young people
Mentoring Specialist	A headspace team member who provides support to young people and mentors engaged in the Career Mentoring Service.
Organisation	Legal entity in the non-government sector.
Participant	A young person receiving DWSS services.
Partnership approach	The partnership approach is an extended data set that providers share with the department, as a genuine collaboration between government and the sector to exchange knowledge to inform service delivery.
Performance	The extent to which objectives or targets are achieved, the efficiency with which resources are allocated and the probity, equity and fairness with which outcomes are achieved.
Risk	The chance of something happening that will have an impact on objectives, measured in terms of consequences and likelihood.
Stakeholders	Individuals, organisations or networks that have, or potentially have, a relationship or interest in the work undertaken by providers.
The Department (or DSS)	The Australian Government Department of Social Services.
Terms and Conditions	The terms and conditions of the standard grant agreement between the department and grantees.

Attachment A - Privacy Incident Management

This fact sheet contains guidance for the DWSS provider on how to respond to a privacy data breach or incident involving the personal information of DWSS participants.

Providers must comply with the *Privacy Act 1988* and the <u>Australian Privacy Principles (APPs)</u>.

There is no single method for responding to a data breach. Data breaches should be handled on a case-by-case basis, by undertaking an investigation of facts and circumstances, assessing risk, and using that risk assessment to decide the appropriate course of action.

Refer to the Office of the Australian Information Commissioner (OAIC) <u>Guide to Data Breach</u> Preparation and Response.

DWSS provider experiences suspected data breach

The first step should always be to **contain a suspected or known breach** where possible, by taking immediate steps to limit any further access or distribution of the affected personal information. Inform your manager of the suspected breach as soon as possible, including the following details:

- a. Time and date the suspected breach was discovered.
- b. Type of personal information involved.
- c. Suspected cause and extent of the breach.
- d. Context of the affected information and the breach.
- e. Involvement of an external stakeholder, if any.

The provider **must notify** the department of an actual or suspected breach by completing **Part 1 of the Provider Privacy Incident Report** (PIR) within one Business Day after the date of the privacy incident. The PIR template is available at **Attachment B**.

Responding to a suspected Privacy Incident

What actions must you take?

There are **four key steps to consider** when responding to a breach or suspected breach.

Ideally, steps 1, 2 and 3 should be undertaken either simultaneously or in quick succession, taking remedial action wherever possible.

Step 1: Contain the breach

Immediately take action to limit the breach. At this point, you may suspect an '<u>eligible data breach</u>' under the <u>Notifiable Data Breach (NDB) Scheme</u> has occurred, which would trigger assessment obligations.

Step 2: Assess the data breach and risk of serious harm to individuals

Quickly gather relevant information about the suspected breach including, for example, what personal information is affected, who may have had access to the information and the likely impacts. By gathering as much information as possible, you will better understand the risk of harm to affected individuals, and be able to identify and take all appropriate steps to limit the impact of the data breach. This assessment **must be completed** and sent to the department within 15 business days.

Step 3: Notify the OAIC and/or affected individuals (if required)

Make a decision, based on the investigation about whether the identified breach is an eligible data breach (see <u>Identifying Eligible Data Breaches</u>).

Step 4: Review the incident and take action to prevent future breaches

Once steps 1 to 3 have been completed, you should review and learn from the data breach incident to improve your personal information handling practices.

Notifiable Date Breach: Reporting

You must complete **Part 2 of the PIR** and submit to the department within 15 business days after the privacy incident. If through your investigation, you determine that there has been an eligible data breach', as defined under the NDB Scheme, you must notify affected individuals, and the OAIC about the breach and inform the department.

If the department holds a different view about whether or not the privacy incident is reportable under the NDB Scheme, the department will seek advice from our Privacy Officer and your Funding Arrangement Manager will contact you in these circumstances.

Attachment B - Provider Privacy Incident Report

Use this form to report to the Department of Social Services (the Department) data incidents that involve personal information and records held by the DWSS provider.

Privacy incidents may involve any unauthorised access, disclosure, or loss of personal information, including damaged, destroyed, or stolen records.

This form is in two parts, (1) initial incident reporting and (2) detailed reporting, and is designed to be progressively updated and submitted, as details of the incident become known over the investigation, assessment, and notification processes.

- Part 1 must be completed and submitted to the Department *no later* than one Business Day after the date of a privacy incident or (if different) when the incident is first discovered.
- Part 2 must be completed and submitted to the Department within 15 business days (21 calendar days) of the privacy incident (and earlier wherever possible).

The form may also be used by Providers to undertake mandatory reporting of 'eligible data breaches' to the Office of the Australian Information Commissioner (OAIC), in accordance with the Notifiable Data Breaches (NDB) Scheme. It is recommended that you read the resources provided by the OAIC about the NDB Scheme and guidance on reporting a data breach.

Part 1A - Provider Information

Provider Name:	
DWSS/Career Mentoring/headspace Site:	
Name of person completing report:	
Position:	
Phone / Email:	
Date of submission to the Department:	

Part 1B - Details of the Incident

Date of privacy incident	
(if different, the date when incident was first detected)	
Provide a description of the incident.	
Include what operational systems were or may be affected and how the unauthorised access, loss or theft occurred.	
If relevant, why were the Records vulnerable?	
How was the incident discovered?	
What type of information was involved in the incident? (e.g. financial details, TFN, identity information, contact information, health or other sensitive information).	
Has anyone (or is anyone likely to have) obtained access to the information?	
Was the incident considered deliberate or inadvertent?	
Was anyone else notified or a witness to the incident?	
If yes, provide details.	
Has the incident been assessed in accordance with the NDB Scheme and is it considered an 'eligible data breach'?	Note: if the answer is unknown at the time of submitting this report, state this. Part 1 is due no later than one Business Day after the date of the privacy incident.
Please explain why/why not and provide reasons.	

Part 2 - Detailed Reporting

<u>Note:</u> Depending on the nature of the privacy breach or incident, not all questions/sections may be relevant. Please note 'N/A' accordingly. If details previously provided in Part 1 remain accurate and fulsome, feel free to refer to those relevant sections in completing Part 2.

Part 2A - Investigation

Describe the investigation undertaken and the evidence and findings. (Evidence of the breach and remedial action must be preserved)	
Part 2B – Rectification/Remediation Acti	on
Describe the actions taken to address the privacy incident and prevent harm to affected parties.	
(E.g. retrieval of records etc.)	
Have steps been taken to prevent the breach from occurring again?	
Is there any other further action proposed?	
Part 2C – Eligible Data Breach	
Has the incident been assessed in accordance with the NDB Scheme and is it considered an 'eligible data breach'?	
Have affected individuals and the Office of the Australian Information Commissioner been notified of the breach and when? (Please describe how affected individuals will be or were informed about the breach of their personal information).	
If you do not intend to notify individuals because of an exception, please provide your reasons, including details about a relevant exception under the <i>Privacy Act</i> 1988.	

Additional Information? (Please include any relevant information that you believe is important)
**If applicable, please provide a <u>statutory declaration for Part 2</u> , stating the Records are damaged beyond salvage or were lost or stolen.
• I confirm the details and attachments provided in this final version of the report (Parts 1 and 2) are accurate and correct and the CEO (or equivalent) <insert ceo's="" here="" name=""> has been informed of this data breach.</insert>
•
•
• Name: Title:
Date: / /

Attachment C - Incident Notification form

Who should use this form

This template is provided for the use of the provider of the Digital Work and Study Service (DWSS). Providers are funded by the Department of Social Services (the department).

When to use this form

Providers should use this form when notifying the department of a serious or reportable incident, as outlined in the DWSS Operational Guidelines. Providers should submit a completed form to their Funding Arrangement Manager within the timeframes outlined in the Operational Guidelines, while updates on incidents should be provided within five days. Providers should report incidents to their DSS Funding Agreement Manager within 24 hours of occurrence/discovery. Reportable incidents include:

- Death, injury or abuse of a participant while in the program, or of staff/volunteers undertaking delivery of DWSS
- · Inappropriate conduct between a participant, especially a child or young person, and employee
- · Significant damage to or destruction of property impacting service delivery
- · Adverse community reaction to the DWSS activities
- · Misuse of the DWSS funding.

Organisation Details

- · · · · · · · · · · · · · · · · · · ·	
Organisation:	
Site Details:	
Name of site manager:	
Signature of site manager:	
Date:	
Incident Details	
Type of incident (serious or reportable):	
Date of incident:	
Time of incident:	
Number of individuals involved:	
Gender of individuals:	
Age/s of individuals involved:	
Status of individuals:	
Location of incident (address and location):	

Incident details:	
(describe what occurred, including what led up to the incident, if applicable. Where there is more than one individual involved, you may refer to the individuals involved as Staff1, Client1, if needed)	
Response to the incident:	
(what actions were taken as a result of the incident occurring)	
Preventative action:	
(what has been implemented, or will be, in order to prevent the incident from happening again)	
Media coverage:	
(outline whether media coverage is likely)	

Attachment D - Data Exchange information

There is a range of information about the Data Exchange, including training resources and policy guidance, available on the Data Exchange web-portal at **dex.dss.gov.au**

You can search 'training resources' to find fact sheets and step-by-step task cards, or search the following to find other useful resources:

- Getting Started:
 - o Quick Start Guide
 - Log in to the Data Exchange web-based portal
- Organisation Administration:
 - Overview of the My Organisation section
 - Setting up the structure of your organisation
 - Create and manage outlets
 - · Add and edit a user
 - Update participation in the partnership approach
- Data Exchange Reports:
 - Report Structure
 - Quick guide to using reports