

Dr Richard Chadwick  
General Manager, Adjudication Branch  
Australian Competition and Consumer Commission  
23 Marcus Clarke Street  
Canberra ACT 2601  
22 April 2015

Dear Dr Chadwick,

**Reference: Application for revocation of authorizations A91084 & A91085 and reauthorizations A91493 & A91494 by Job Futures Ltd**

I am writing on behalf of Advance Personnel in support of Job Futures application for Revocation and Substitution of Authorizations and Interim Authorizations as above.

Advance Personnel was established in 1989 to provide dedicated employment services and support to people with a disability in the ACT region. We are located in Phillip ACT with satellite offices in Belconnen and Queanbeyan.

Advance has been a member of Job Futures since 2014 which we joined because it afforded us greater service capability, a set of business tools to improve performance and a membership network that enhanced and built our social and corporate capitals. We have not for profit status and offer our services which are funded by the Commonwealth to eligible people in a non-discriminatory manner in respect of age, race, culture, religion or disability.

Despite gaining Disability Employment Services funding under tender in our own right in 2012 we found that as a stand-alone community based organization that the increased complexity and compliance requirements of the contracts meant our returns were diminishing. We are not unusual in this environment and many organizations around us being financial strained and merging with one another one of the benefits of Job Futures membership is the shared expertise and knowledge.

Through Job Futures we access improved delivery resources, robust compliance systems and business advice leading to improved performance and better outcomes for our job seekers which benefits them and the community.

### **Maintaining diversity in the market**

The Job Futures co-operative model enables small/medium, not for profit organizations like Advance to effectively compete for business in the face of:

- Increasing competition and move to larger providers in both DES and general employment services;
- Increasingly sophisticated tender requirements;
- Greater risk to small, local organizations of losing business and the benefit we bring to our community.

The wider benefit to the community of Job Futures is very similar to that of Mutuals and Cooperatives for specific services such as banking. The existence of member organisations such as Job Futures is essential to Australia as they provide choice and are representative of the diversity of our economy, democracy and communities. Job Futures is a highly efficient corporate and community organisation and, as such a purveyor social values and capital as well as making an important economic contribution to the society.

Advance Personnel acknowledges that the strength of the Job Futures model is underpinned by the cooperative approach of the members to achieve a common goal. We support the principle that in order to gain the benefit of the co-operative, from time to time the individual organisation may need to forgo some freedom for the greater good, as per the non-compete clauses contained in Job Futures relevant documents.

Advance Personnel supports this application for authorisation (and interim authorisation) and believes that the continued operation of the Job Futures model contributes to a more diverse market for government funded employment services, at the same time providing benefit to our local communities.

Yours sincerely

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