



4<sup>th</sup> May 2015

Dr Richard Chadwick  
General Manager, Adjudication Branch  
Australian Competition and Consumer Commission

By email: [adjudication@accc.gov.au](mailto:adjudication@accc.gov.au)

Dear Richard

**Re: A91493 & A91494 – Job Futures Limited - Submission**

I am writing on behalf of Australian Community Support Organisation (ACSO) to provide comments and feedback on Job Futures applications for Revocation and Substitution of Authorisations and Interim Authorisation.

Established in 1983 as a drop in centre for ex prisoners, ACSO is a courageous organisation with a vision to create a safe and inclusive community freed of crime and prisons. It's our goal to reduce re-offending and our mission is to help people transition from prison, assist them in the community, stop them from re-offending and divert others from committing crime. Our ethos is simply to create another chance; to promote recovery and to support rehabilitation and re-integration people back into the community.

Our commitment to our vision and mission has seen ACSO become a “provider of choice” in the delivery of forensic services and programs for people who are transitioning from prison back into the community, along with those with complex and multiple needs who are in or at risk of entering the criminal justice system”.

We offer innovative services responding to unemployment, mental illness, disability, homelessness, substance use and offending behaviour throughout the metropolitan area and regional Victoria. These services are delivered through our ‘wrap around’ service delivery model that integrates ACSO’s Housing, Complex Care, Clinical, Employment and Community Enterprise Divisions to achieve better outcomes for our clients and the communities we serve. ACSO has been a member of Job Futures since 2012.

We believe that Job Futures has created a unique model that enables not for profit organisations with a specialist focus like ACSO to deliver quality employment programs as part of their suite of services. Providing employment opportunities bring real value to our services for ex-offenders, we know that jobs change lives.

While ACSO held both Job Services Australia and Disability Employment Services in our own right, as a small part of our overall business, our employment services performance was not strong in terms of our star rating and also financially. Although it was not our core reason for being it was taking us significant time and resources to manage both our DES and JSA contracts. With this in mind in 2012 we made the decision to novate our contracts to Job Futures Ltd. This decision took place over a 12 month period with our Board where we considered all options open to us, including the possibility of handing these contracts back to Government.

Membership of Job Futures meant that our leadership was supported to develop a performance and business model improvement plan. This enabled our wider leadership to focus on our core business, building safe inclusive communities freed of crime and prison, knowing that our employment services contracts were performing well with additional expert advice and support and that our clients were getting life changing access to real work opportunities.

Through Job Futures collective tendering arrangements in the DES tender ACSO was able to demonstrate improving performance backed up by Job Futures track record and expertise. Not only were we successful in winning and expanding our general DES contract, we also gained a specialist ex-offender/mental health contract. This enables us to provide a complete service for this highly disadvantaged group of people which cannot be accessed elsewhere. It was an outcome we were really proud of and do not believe we could have gained this even if we had wanted to bid in our own right.

ACSO wholeheartedly agrees that the strength of the Job Futures model is underpinned by the cooperative approach of the members to achieve a common goal in delivering employment services contracts for complex and specialist groups in our communities. We hold a strong view that members who bid with job futures for employment services contracts should not be able to compete against themselves and job futures in alternative bids for the same business. This is a model we are well used to and often enter into teaming agreements in other consortia bids where we agree to not compete against the consortium bid we are part of. In situations where this occurs it makes an entire tender and business model flawed. Simply put, the greatest asset and competitive edge Job Futures has in the market place is its members.

ACSO supports this application for authorisation (and interim authorisation) and believes that the continued operation of the Job Futures model in its delivery of employment services contracts will result in ongoing public benefit by supporting a diverse specialist sector.

Should you require clarification or further information on the above, please don't hesitate to contact me on email: [karenza@acso.org.au](mailto:karenza@acso.org.au) or via telephone 03 9413 7010

Yours sincerely



Karenza Louis-Smith  
**CEO**