

Aboriginal Peak Organisations Northern Territory

An alliance of the CLC, NLC, CAALAS, NAAJA and AMSANT

APO NT submission on the Social Security Legislation Amendment (Community Development Program) Bill 2015

February 2016

Aboriginal Peak Organisations NT (APO NT) is an alliance between the North Australian Aboriginal Justice Agency (NAAJA), Central Australian Aboriginal Legal Aid Service (CAALAS), Aboriginal Medical Services Alliance NT (AMSANT), Central Land Council (CLC) and the Northern Land Council (NLC).

APO NT is pleased to be able to make a submission on this important area of public policy which disproportionately impacts Aboriginal people in the Northern Territory, particularly in remote and very remote locations.

Recommendations

Recommendation 1 – That the CDP Bill be withdrawn

APO NT recommends that the CDP Bill be withdrawn and that the government embark on a genuine process of engagement with communities, Aboriginal organisations and current providers to reform and improve the operations and outcomes of the CDP program.

Recommendation 2 – Scrap the 25 hours per week Work for the Dole requirement

APO NT recommends that the 25 hours per week WfD activity requirement for remote communities be scrapped and brought in line with the 15 hours per week applied to non-remote participants.

Recommendation 3 – National job seeker compliance framework

APO NT agrees that CDP participants should not be subject to the National Job Seeker Compliance framework and that alternative compliance rules with effective protections should be developed for remote communities.

Recommendation 4 – Review of disengagement with the social security system

APO NT recommends that the government undertakes an independent review of the circumstances and contributing factors to disengagement and non-compliance with the social security system and its impacts on remote communities.

Recommendation 5 – No Ministerial powers to determine social security rules

Social security law is a core responsibility of the Australian Government and delegation of critical decisions to one Minister would undermine the fundamental responsibility of the

Parliament to hold the Government to account. APO NT recommends that the Minister not be provided with powers to determine social security rules and to declare regions under which special rules will apply.

Recommendation 6 – Develop alternative social security rules for remote communities

APO NT recommends that alternative social security participation rules for remote communities be developed with the following criteria:

1. The rules are simple and appropriate for the circumstances of job seekers in remote communities;
2. Community support is obtained through effective consultation and involvement of local people and their constituent local, regional and peak Aboriginal organisations;
3. The rules should be able to be administered locally with the involvement of local Aboriginal organisations where appropriate.
4. The process should include appropriate scrutiny and evaluation of the measures.
5. Social security laws should be subject to Parliamentary scrutiny.

Recommendation 7 – Revising the exemptions and assessment processes

APO NT recommends that fixing the current flaws in the exemptions and assessments processes for CDP will require:

1. A narrowing of the categories of people subject to CDP to exclude those facing significant and persistent barriers to workforce participation;
2. Development of an alternative exemptions process that provides for local flexibility and the involvement of local people and organisations in the process, and;
3. Transparency and evaluation of exemption data.

Recommendation 8 – WfD hours worked should be benchmarked against the minimum wage

APO NT recommends that if WfD is to be applied then the number of hours worked should be benchmarked against the minimum wage.

Recommendation 9 – Additional paid employment should count towards WfD requirement

APO NT recommends that the provisions to alter tapering rules be altered to ensure that hours of paid employment that are worked in place of WfD should count towards the required WfD hours and not lead to cutting income support for that period.

Recommendation 10 – Establish a trial of APO NT's model in the NT

APO NT recommends that the Minister considers establishing a trial of APO NT's 'Remote Participation, Employment and Enterprise Development Scheme' model in the Northern Territory.

Introduction

Since APO NT was established in 2010, we have participated in the ongoing policy debate around remote participation and employment. APO NT argued strongly against the dismantling of CDEP because the ideologically-influenced criticisms of it—that it had become a destination in itself and not a pathway to employment—failed to acknowledge the individual, community and cultural benefits of the scheme and its suitability to the realities of remote communities with very high levels of disadvantage and limited economies and sustainable job prospects.¹ CDEP had the capacity to be empowering of both individuals and their communities.

APO NT cautioned that abolishing CDEP would force participants down a pathway from wages to welfare—a potentially one-way ticket into coercive welfare dependency and bureaucratic managerialism. Further, that it would undermine and threaten existing Aboriginal organisations and enterprises that had grown in large part because of the opportunity CDEP provided to invest labour and resources in community led employment and economic initiatives.

Nevertheless, when it was clear the then federal Labor Government was committed to CDEP's demise, APO NT engaged positively with the government to try to influence the shape of the new Remote Jobs and Communities Program (RJCP) which was to replace CDEP. Importantly, APO NT worked with Aboriginal CDEP organisations in the Northern Territory to design an alternative model that took account of the realities of remote communities and the need to create employment conditions through a waged component managed locally, and to build Aboriginal organisations and enterprises as the foundations of sustainable employment in remote communities. APO NT's proposed model, the 'Remote Participation, Employment and Enterprise Development Scheme' (elsewhere also referred to as 'CEEDS')², is discussed further in our submission.

APO NT believes that the RJCP and the current CDP have failed to provide workable or acceptable alternatives for remote communities. Apart from the permanent municipal services jobs created out of some former CDEP jobs (the so-called 'real jobs' which arguably, should have been government funded jobs from the outset), the outcomes claimed for the new programs have been disappointing particularly in relation to mainstream employment and training outcomes. APO NT's view is that the new programs have delivered less in positive outcomes than they have in costs to individuals, families and communities, as well as representing poor value for taxpayers. Growing despondency, disengagement and non-compliance in remote communities are markers that policy is heading in the wrong direction.

While APO NT supports any efforts to improve CDP for the benefit of those subject to it, we do not believe the changes contained in the current Bill are significant improvements and may have the potential to produce negative and unintended consequences. What is required is a process of genuine engagement with communities, Aboriginal organisations and current providers in re-

¹ APO NT 2011, *Work Not Welfare: Investing in a waged employment program in remote Northern Territory*.

² APO NT 2011, *Creating and Supporting Sustainable Livelihoods: A Proposal for a New Remote Participation, Employment and Enterprise Development Scheme. A Response to the Australian Government Review of Remote Participation and Employment Services*. October 2011.

designing the system, rather than trying to tinker with a fundamentally flawed policy and expecting that it can ever achieve goals it is incapable of delivering.

The remainder of this submission discusses key elements of the Bill and associated issues and provides a number of recommendations on further actions required.

Recommendation 1 – That the CDP Bill be withdrawn

APO NT recommends that the CDP Bill be withdrawn and that the government embark on a genuine process of engagement with communities, Aboriginal organisations and current providers to reform and improve the operations and outcomes of the CDP program.

Post-CDEP changes: work to welfare

One of the important reasons for opposing the abolition of CDEP was that it would mean participants would transfer from work to the welfare system and be subject to administrative and compliance arrangements that are immensely more complex and inflexible than under CDEP. It also has meant that instead of being managed through a local Aboriginal organisation that is aware of their circumstances, many participants now have to deal with large jobs provider organisations, whose hands are tied by restrictive, managerial contract conditions, and also with inadequately resourced DHS staff with limited on-ground presence and local knowledge. This has likely contributed to many more individuals falling foul of the system and facing breaching penalties.

Instead of having the benefits of waged employment with transparent and simple incentives and penalties based on reward for extra work undertaken and locally enforced no-work-no-pay rules, the post-CDEP regimes have had to construct an ever more complex system of incentives and penalties for both participants and providers. For CDP participants these seem discriminatory, arbitrary and unfair, and, given this is a welfare program not a subsidised waged scheme, there is no simple and transparent employer/employee relationship. For providers, the complexities of having to run social security administration along with constant compliance monitoring and reporting means that more resources are required for administration and there is less focus on achieving employment and community outcomes.

The system itself and the resultant contracts for providers are in fact so complex that it requires large providers with very high technical capacity, ruling out most local Aboriginal organisations. It has had the effect of replacing what had previously been a community development and empowerment model with a government imposed managerial model with decision-making exercised by external providers, the Department or the Minister.

APO NT does not believe that devolving decisions regarding breaches to providers will improve the major structural faults of the current regime. Indeed many providers, particularly local Aboriginal providers, are nervous and resistant to playing this role. Moreover, providers have a conflict of interest as their payments vary depending on whether they achieve certain outcomes over others and have a direct financial interest in keeping people in WfD.

Discriminatory and onerous remote CDP regime

APO NT strongly opposes the discriminatory application of CDP to remote communities, requiring a 25 hours per week Work for the Dole (WfD) obligation, which is considerably more than the 15 hours per week required of those in non-remote areas (other than Alice Springs town camps). This means that CDP participants are paid at a notional rate of about \$10.50 per hour – far below the minimum award wage. In comparison, CDEP workers were paid in line with minimum award rates (achieved through working around 15 hours per week).

In addition to being discriminatory and coercive, there is no evidence that CDP WfD will achieve the behavioural change that is its stated objective. In the NT it is associated in the minds of remote community residents with the discriminatory regime of the NT Intervention that was imposed on remote communities. A comprehensive review of the Income Management measure of the Intervention showed that, despite massive expenditure and investment in human resources and systems, it failed to achieve the desired behavioural change.

APO NT believes that the onerous requirement of 25 hours WfD activities per week, particularly in the context of remote populations with high levels of poor health, chronic health conditions, mental illness, disability and family violence, greatly expands the potential for participants to breach WfD requirements and so face serious financial penalties. APO NT understands that high rates of breaching were already occurring under RJCP and appear to have escalated dramatically with the introduction of the 25 hours per week requirement under CDP.

APO NT strongly recommends that the 25 hour per week WfD activity requirement for remote communities be immediately scrapped and brought in line with the 15 hours per week applied to non-remote participants.

Recommendation 2 – Scrap the 25 hours per week Work for the Dole requirement

APO NT recommends that the 25 hours per week WfD activity requirement for remote communities be scrapped and brought in line with the 15 hours per week applied to non-remote participants.

National Job Seeker Compliance Framework unsuitable for CDP

Compliance mechanisms under both the previous RJCP and CDP are overly complex and under-resourced to deal with the number and nature of exemptions that should be expected in remote communities given their demographic characteristics.

Making CDP participants subject to the national job seeker compliance framework, which “applies financial penalties and suspensions for missing appointments and activities ... [and] is complex – with a large number of different suspension and penalty types” was a policy error. APO NT asserts that CDP participants should not be subject to the national compliance framework, which was developed for situations markedly different from those in remote locations, and is consequently inappropriate for the circumstances of CDP participants.

APO NT believes that the application of the compliance framework for CDP participants is contributing to high levels of non-compliance and unacceptable rates of breaches and penalties.

Alternative compliance rules need to be developed, however this must be done in consultation with Aboriginal communities and their constituent organisations (see below). The rules must also ensure there are effective and properly resourced protections for vulnerable people. This would result in a compliance framework that is relevant, comprehensible and achievable for remote participants.

Recommendation 3 – National job seeker compliance framework

APO NT agrees that CDP participants should not be subject to the National Job Seeker Compliance framework and that alternative compliance rules with effective protections should be developed for remote communities.

Urgent review of high breaching rates for CDP needed

While the national compliance framework is contributing to the very high breaching rates that are being applied to CDP participants, APO NT believes that it is only one of a number of factors.

The Explanatory Memoranda indicate that there has been an alarming acceleration in breaching rates for CDP participants, with most recent figures showing they attract 60% of No Show No Pay penalties despite making up only 5% of the overall caseload. Clearly there are serious flaws in the policy that must be urgently addressed, however, the Minister has not provided a convincing case that the changes proposed in the Bill will provide effective solutions.

It is not clear, as claimed in the Explanatory Memoranda, that high breaching rates are mainly due to difficulties in understanding rules or lags in penalties being applied and that addressing these issues will lead to behavioural change. APO NT considers that more compelling explanations are to be found in the overall onerous nature of the WfD requirements and inflexible and flawed compliance and exemption processes, particularly given the high rates of vulnerability, disability and chronic illnesses that are found in remote communities.

It seems clear that the application of the 25 hours per week WfD requirements from 1 July 2015 has fuelled the acceleration in breaching rates, and that removing this discriminatory and onerous measure will lead to some improvement.

Anecdotal evidence gathered by APO NT also suggests that there has been significant disengagement from the system since the RJCP was introduced and that this has particularly involved young men in the 18-49 years age group. This is consistent with the very high levels of working age individuals reported as 'not in the labour force' (NILF), with estimates in remote communities in the NT being close to 60% in the 15-24 age group³.

³ Havnen, O. 2012. *Office of the Northern Territory Coordinator-General for Remote Services Report, June 2011-August 2012*. Pp 175-177.

Given that individuals classed as NILF have no income and presumably rely on their families to provide food and shelter, and taken together with the high rates of breaching penalties being applied in remote communities, the cumulative economic and social impacts on financially disadvantaged individuals, families and communities is a serious social and policy concern that needs to be addressed by the government.

APO NT believes that it is inappropriate to consider piecemeal changes to the remote welfare system in the absence of sound evidence about the drivers and impacts of disengagement and non-compliance in remote communities. What is required is an independent review of the circumstances and contributing factors to disengagement and non-compliance with the social security system and its impacts on remote communities. This will provide a starting point on which to consider changes to the system.

Recommendation 4 – Review of disengagement with the social security system

APO NT recommends that the government undertakes an independent review of the circumstances and contributing factors to disengagement and non-compliance with the social security system and its impacts on remote communities.

The more immediate point is that without evidence of what the drivers of these circumstances are, the Minister risks imposing yet further changes to the rules which may be ineffective and potentially detrimental.

Concern over Ministerial powers to make social security rules

In addition to the need to act on the basis of sound evidence, it is also essential that the processes for developing and implementing changes are appropriate. The processes provided for in the Bill raise significant concerns.

APO NT believes that the role of varying the current compliance rules and other social security rules should, as a matter of principle, not be one for the Minister, but for the Parliament.

The Bill does not provide details of key aspects of these measures, instead providing the Minister for Indigenous Affairs, and the Secretary of the Department of Prime Minister and Cabinet, with very significant new regulation-making powers. The Minister will be able to determine things such as:

- work obligations;
- what constitutes work;
- the ‘no work, no pay’ penalties and penalties for non-compliance;
- what amounts to a ‘reasonable excuse’;
- functions of CDP providers; and
- the provision of weekly payments.

The Minister would also have the power to single out particular regions for different treatment. This is discriminatory and reminiscent of the imposition of income management and roll out of the Basics Card.

Social security law is a core responsibility of the Australian Government and delegation of critical decisions to one Minister would undermine the fundamental responsibility of the Parliament to hold the Government to account. Disallowable instruments do not adequately ensure Parliamentary scrutiny. APO NT also notes concerns raised by the Parliamentary Joint Community on Human Rights including that “the bill engages and may limit the right to social security and the right to an adequate standard of living, and the right to equality and non-discrimination”.⁴

Further, the Bill provides no requirement for consultation or involvement by local people or their constituent organisations; independent scrutiny or evaluation of measures; community consent; or evidence that the new rules will be beneficial. Neither does it limit the obligations that may be imposed or the penalties that could be applied.

Even were the Bill to be amended to include such safeguards, APO NT notes that Ministerial carriage of consultations at the community level has not been successful in the past. For example, the Stronger Futures consultations had clearly pre-determined outcomes and precluded effective community input; while consultations over Alcohol Management Plans in the NT were also overly prescriptive and conducted at too small a scale to be practical with only one AMP ever completed and approved by the Minister. Indeed, there was also a conspicuous lack of community consultation over the introduction of the 25 hours per week WfD requirement for remote communities.

The process envisaged in the Bill would also leave most communities in limbo subject to the existing inappropriate rules for a potentially indefinite period and others potentially subject to different or inconsistent processes and ad-hoc outcomes. This would also fuel perceptions of discriminatory treatment of individual communities and a sense that the system is arbitrary and unfair.

Importantly, these outcomes would not produce the kind of broad support at the community level enjoyed by CDEP and which, arguably, is required to achieve an effective system.

For these reasons APO NT opposes the Minister being given powers to determine social security rules and to declare regions under which special rules will apply.

Recommendation 5 – No Ministerial powers to determine social security rules

Social security law is a core responsibility of the Australian Government and delegation of critical decisions to one Minister would undermine the fundamental responsibility of the Parliament to hold the Government to account. APO NT recommends that the Minister not be provided with powers to determine social security rules and to declare regions under which special rules will apply.

⁴ Parliamentary Joint Committee on Human Rights 2016. Human rights scrutiny report - Thirty-third report of the 44th Parliament, 2 February 2016. P7.

Developing alternative rules for remote communities

Instead of seeking such powers through this Bill, the Minister should outline a process for obtaining community consent for new rules which can be applied in remote communities. APO NT suggests that the following elements are required:

- Rules for social security compliance should be appropriate for the circumstances of the communities in which they are applied.
- The process should be aimed at achieving community support for the rules based on effective consultation and involvement of local people and their constituent local, regional and peak Aboriginal organisations.
- Remote communities in the NT and in other jurisdictions have broadly similar characteristics that should enable simple, consistent rules to be developed that can be administered locally and flexibly.
- The rules should enable the involvement of local Aboriginal organisations in their application and administration.
- The process should include appropriate scrutiny and evaluation of the measures, particularly to identify and address any unintended consequences.

Without community support and buy in the current problems of the system with non-compliance and disengagement will continue. Community support will only come if there is perceived to be genuine involvement of local people and their local/regional/peak organisations and if the resulting rules are able to administered effectively, simply and transparently at the local level.

Recommendation 6 – Develop alternative social security rules for remote communities

APO NT recommends that alternative social security participation rules for remote communities be developed with the following criteria:

1. The rules are simple and appropriate for the circumstances of job seekers in remote communities;
2. Community support is obtained through effective consultation and involvement of local people and their constituent local, regional and peak Aboriginal organisations;
3. The rules should be able to be administered locally with the involvement of local Aboriginal organisations where appropriate.
4. The process should include appropriate scrutiny and evaluation of the measures.
3. Social security laws should be subject to Parliamentary scrutiny.

Revising the exemptions and assessment process

APO NT opposes the blanket inclusion of most individuals aged 18-49 years in CDP. Since 2006 there has been an expansion in the groups of people required to participate in labour market programs, including more single parents and people with disabilities and those with other significant barriers such as homelessness and mental health problems. This has resulted in people who should not be in CDP having to apply for an exemption, if indeed they are capable of doing so.

Aboriginal people in the NT and particularly those living in remote areas experience significantly higher rates of conditions that can constitute barriers to WfD or labour market participation. Figures from the Aboriginal and Torres Strait Islander Health Performance Framework 2014 show that in the NT:

- 30.5% of Indigenous persons have a disability or restrictive long-term health condition.
- 23.5% of Indigenous adults reported high/very high levels of psychological distress.
- 62% of Indigenous persons living in remote areas live in overcrowded households.
- Educational achievement among Indigenous persons in the NT is markedly below both Indigenous rates nationally and non-Indigenous rates, with barely a third of Year 7 students meeting the reading benchmark and only one fifth meeting the writing benchmark. Only 36% of those aged 20-24 had attained at least Year 12 or equivalent.⁵

The significant disadvantage experienced by Aboriginal Territorians translates into low life expectancy rates. 2010-2012 figures show Indigenous life expectancy at birth is 16.3 years less for Indigenous males than the rate for males nationally; and 14.5 years less for Indigenous females than the rate for females nationally.

Aboriginal households are also more economically vulnerable with 52.4% of Indigenous persons aged 18 and over in the bottom quintile of weekly household income. This means that remote communities are suffering not only a disproportionate rate of financial penalties under CDP but also a disproportionate economic impact from the imposition of those penalties in comparison to the broader community.

Given these figures, the apparent very low rate of successful exemptions under the current system indicates that people who should be protected from the system are being failed by a flawed exemptions process. As a result many of those most vulnerable and in need in remote communities are being penalised unfairly, needlessly and pointlessly to their considerable detriment and those of their families.

Assessments for remote participants are currently carried out by DHS, usually by allied health professionals. However, the lack of resources and insufficient staffing by DHS means that interviews are rarely done face-to-face, and are almost always without an interpreter. This heightens the risk that assessments are not being done properly and that individuals who should qualify for an exemption are not getting one. Added to this is the problem that DHS staff have limited local knowledge and experience – a situation very different from under CDEP where local Aboriginal organisations were involved.

APO NT is aware that concerns have been expressed by current providers and others about whether assessments for partial capacity or exemptions for health and other reasons are being carried out properly by DHS. However, no evidence has been provided on the impact of either RJCP or the new CDP on vulnerable, sick and disabled people inappropriately caught up in the system. No data on the rate of exemptions has been provided. APO NT believes that such data is essential to determining whether avoidable harm and detriment is being experienced.

⁵ ATSI Health Performance Framework Report 2014.

APO NT believes that fixing the current flaws of the CDP exemptions and assessment processes will require a narrowing of the categories of people subject to CDP to exclude those facing significant and persistent barriers to workforce participation, and the development of an alternative exemptions process that provides for local flexibility and the involvement of local people and organisations in the process.

Recommendation 7 – Revising the exemptions and assessment processes

APO NT recommends that fixing the current flaws in the exemptions and assessments processes for CDP will require:

1. A narrowing of the categories of people subject to CDP to exclude those facing significant and persistent barriers to workforce participation;
2. Development of an alternative exemptions process that provides for local flexibility and the involvement of local people and organisations in the process, and;
3. Transparency and evaluation of exemption data.

New tapering rules

The Bill aims to provide better incentives for people to take up paid work, however, the benefits of the new income support taper rates are limited by the operation of strict WfD requirements and will result in some participants being worse off and working for well below award rates. This is because any extra hours worked and extra income will be offset by the 25 base hours not worked for WfD, which will result in people working below award rates.

Under CDEP, wages were based on the minimum wage meaning to meet Newstart payments, recipients only had to work for 15 hours.

APO NT asserts that if WfD is to be applied then the number of hours worked should be benchmarked against the minimum wage. In addition, hours of paid employment that are worked in place of WfD should count towards the required WfD hours, and not lead to cutting income support for that period.

Recommendation 8 – WfD hours worked should be benchmarked against the minimum wage

APO NT recommends that if WfD is to be applied then the number of hours worked should be benchmarked against the minimum wage.

Recommendation 9 – Additional paid employment should count towards WfD requirement

APO NT recommends that the provisions to alter tapering rules be altered to ensure that hours of paid employment that are worked in place of WfD should count towards the required WfD hours and not lead to cutting income support for that period.

APO NT's alternative Remote Participation, Employment and Enterprise Development Scheme model

While APO NT understands and supports the Minister's stated intention to revisit some of the positive elements of the CDEP scheme, we do not agree that this is achieved in the measures put forward in the Bill. Indeed, it is misleading and disingenuous to claim that the CDP Program, including the measures in this Bill, bear any resemblance to CDEP. Significantly, the evidence to date, including from CDEP, suggests that a system based solely on income support payments, regardless of the penalties and incentives in place, will not significantly improve employment and participation outcomes in remote communities.

APO NT urges the Minister to consider alternative approaches and offers as an example the 'Remote Participation, Employment and Enterprise Development Scheme' developed by APO NT together with Aboriginal CDEP organisations in the Northern Territory.

APO NT's model recognises the complexities of remote service delivery as well as evidence of what has worked before. It recognises the importance of local enterprise development and commercial contracts and the need for wage subsidies for driving participation. The retention of wages in the proposal allows effective enforcement of 'no work no pay' while creating an internal labour market to reward productive and reliable workers. The model recognises the reality that many Aboriginal people in remote areas have significant educational disadvantage including very low literacy and numeracy. It identifies the need for long-term transitional pathways to assist individuals and communities to achieve sustainable livelihoods. It does this by creating three tiers of participation:

- The first tier is the entry point of the scheme, in which basic opportunities for engagement and participation are provided. At this level, participants can engage in activities that develop and maintain formative skills and experience for sustainable livelihoods. A basic level of income and activity support is provided.
- In the second tier, participants and providers work together to design a livelihood pathway that is tailored to meet the aspirations and capabilities of the participant. This pathway also seeks to match participants to established and emerging employment and enterprise opportunities in the community economy. A higher level of income and activity support is provided in exchange for the achievement of a set of clearly stated skill-based goals. Wages paid in this tier will be taxed and superannuated in line with national rates.
- In the third tier, a participant is engaged directly in the employment or enterprise opportunity identified in their livelihood pathway. The participant receives an initial period of intensive support. Government, employers and enterprises combine to contribute to the participant's income. Wages paid in this tier will be taxed and superannuated in line with national rates.

- Participants are encouraged to enter, move through and eventually exit the scheme (in the latter case for mainstream employment where possible), by using a system of incentives coupled with a mechanism similar to CDEP's 'no work no pay'.

APO NT's recommends that the Minister considers establishing a trial of APO NT's model in the Northern Territory.

APO NT's proposal, submitted to the previous Australian Government Review of Remote Participation and Employment Services, and provided again to the current Minister for Indigenous Affairs in 2015, is provided as an appendix to this submission.

Recommendation 10 – Establish a trial of APO NT's model in the NT

APO NT recommends that the Minister considers establishing a trial of APO NT's 'Remote Participation, Employment and Enterprise Development Scheme' model in the Northern Territory.