New Disability Employment Services Model consultation paper

Submission







MISSION AUSTRALIA

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About us

Mission Australia is a national, non-denominational Christian charity that has been helping vulnerable people move towards independence for more than 160 years. Our vision is an Australia where all of us have a safe home and can thrive. In the 2020-21 financial year, we supported over 150,000 individuals through 474 programs and services across Australia.¹

Across Australia, we have extensive experience as a provider of Disability Employment Services (DES) and in the provision of early intervention and inclusion services for people with disability. We provide community-based mental health support for people with psychosocial disability. We have been an NDIS partner delivering Local Area Coordination and Early Childhood Early Intervention services since 2016. Further, a significant number of clients and consumers of our other services (such as homelessness services and community housing) are people with disability, including psychosocial disability. As a result of this combined organisational experience, we have a deep understanding of the intersecting needs of people with disability and operate in a person-centred, trauma-informed, and recovery-oriented practice mode.

Mission Australia is committed to the rights of people with disability, including the right to live an ordinary life. Realisation of these rights fundamentally requires choice and control in the support they receive and in their life. This must include choice and control over the nature and evolution of their economic participation – the right to learn, change and progress the career choices expected in an ordinary life.

Introduction

Work can provide economic freedom and is a source of social connection, self-esteem, and dignity. For people with disability, employment should be a normalising experience that promotes status and integration in the community and economic independence. These are also factors that lessen dependency on the health and welfare systems.² For people with psychosocial disability, studies show that employment improves psychological health and wellbeing, improves quality of life, reduces psychiatric symptoms, improves general functioning, and reduces rates of relapse.³

¹ Mission Australia, 2021. Annual Report 2021, https://www.missionaustralia.com.au/annual-report-2021.

² Mueser K, Becker, D, Torrey, W et al., 1997. Work and non-vocational domains of functioning in persons with severe mental illness: a longitudinal analysis, Journal of Mental and Nervous Disease, 185.

³ Tsang, H, Lam, P, Ng, B, Leung, O, 2000. Predictors of employment outcome for people with psychiatric disabilities: a review of the literature since the mid '80s. Journal of Rehabilitation 66 (2).

Mission Australia welcomes the opportunity to positively influence the way DES will be delivered from July 2023. This submission has been informed by the voices of our DES participants and practitioners, who have deep expertise in the real-world experiences of living with disability and participating in the DES program.

We believe this reform sits within broader action needed by the Government to listen to people with disability who advocate for "a whole-of-government and whole-of-community approach to enable employers to create meaningful, flexible and inclusive employment, make workplaces more accessible, remove discrimination and build positive employer and community attitudes." ⁴

We have addressed the discussion topics set out in the *New Disability Employment Services Model consultation paper* below.

Who should be able to access a specialist disability employment program?

Access should be broad-based

DES should be accessible to any person who is recognised as having a temporary or permanent medical condition that impacts their ability to work or the type of work they can do. Access should be broad and in line with *Disability Services Act (1986)*, which includes the objectives to "assist persons with disabilities to receive services necessary to enable them to work towards full participation as members of the community" and to "assist persons with disabilities to achieve positive outcomes, such as increased independence, employment opportunities and integration in the community".

Current program rules that limit access should be reviewed with the objects of the *Disability Services Act* (1986) in mind. One example is the requirement for participants aged over 66.5 years to exit the program. Participants who are eligible for the age pension should have the choice to remain in the program to support their continued workforce participation and eventual transition to retirement. The most recent research by the Australian HR Institute and the Australian Human Rights Commission has found the expected age of retirement is increasing, with a majority of Australian's expecting to retire between 66-70 years of age (39.6%) and 17.4% of Australians between 71-75 years of age. Support to access the social, economic, and other benefits of work should not be denied to older people with disability who choose to remain in the workforce.

Greater connections between DES and NDIS will increase access

An important principle underpinning employment for people with disability is breaking down the barriers between the three choices that have historically been available: employment in the open market, supported employment, or social participation activities through day programs.

⁴ People with Disability Australia, 2019. Employment, https://pwd.org.au/our-work/elections/election-archive/federal-election-2019/employment/.

⁵ Australian HR Institute and Australian Human Rights Commission, 2021. Employing and retaining older workers April 2021, https://humanrights.gov.au/sites/default/files/document/publication/ahri_employingolderworkers_april_2021.pdf.

There is a perception among some DES providers that people who are eligible for the NDIS are not eligible for DES, a misperception that limits choice and opportunity for many. It is critical to consider the NDIS Participant Employment Strategy 2019-2022 in this context. This Strategy sets out a vision and plan for ensuring that "NDIS participants have the same opportunities to work as other Australians, and the confidence, support and skills to take advantage of those opportunities".⁶ Our own client data suggest that a significant proportion of NDIS Participants would like to find employment and choose to include employment goals in their Plans.

Flexibility in moving between supported employment and employment in the open market, depending on capacity and aspirations is an important principle. Consultations with people with disability in supported employment found 37% wanted to move into open employment in the future but were unsure of how to find, apply and secure a job, and were unaware of services that could assist.⁷

Serious consideration should be given to embedding opportunities for mixed employment options (both in supported and open market) to build people's confidence in entering open employment. This could be offered through the future DES model. One of the benefits for people with disability is the ability to earn open market wages, which are substantially higher than those in supported employment. This may lead to a higher level of personal financial security than provided by the Disability Support Pension and supported employment. However, it is important to take into account when making any changes that many people with disability are concerned that employment will affect their Disability Support Pension.

Part of the solution is better connections between the employment services and supports offered through the NDIS (for example, supported employment through Australian Disability Enterprises (ADEs)) and the support towards open employment opportunities through DES. Currently supported employment is the outcome for ADEs, rather than increasing expectations and supporting increased aspirations of people with disability. The Australian Government should implement the stakeholder ideas generated in its 2018 consultation findings on supported employment, which includes improved connections between the NDIS and DES along with outcome payments for ADEs that assist a supported employee into open employment, and awareness raising of employment assistance available.⁸

How can we simplify entry to the disability employment support model?

Improving the assessment process should be a priority in the new model and should include a greater strengths-based and holistic focus. Strong feedback from our practitioners is that the current assessment process is not timely and leaves prospective participants in jobactive when DES would be more suitable for them. We have found it takes approximately 30 days on average for assessments to be

⁶ NDIS, 2019. NDIS Participant Employment Strategy 2019-2022, https://www.ndis.gov.au/media/1957/download?attachment.

⁷ Department of Social Services, 2018. Ensuring a strong future for supported employment Consultations Summary of stakeholder consultations December 2017 – April 2018, Australian Government, https://engage.dss.gov.au/wp-content/uploads/2018/07/PROOF-7-8876-Supported-Employment-Policy-Report-FINAL.pdf

⁸ Department of Social Services, 2018. Ensuring a strong future for supported employment Consultations Summary of stakeholder consultations December 2017 – April 2018, Australian Government, https://engage.dss.gov.au/wp-content/uploads/2018/07/PROOF-7-8876-Supported-Employment-Policy-Report-FINAL.pdf

finalised. Too often, assessments produce an inaccurate identification of a person's level of functional capacity and disadvantage. Several reasons for this have been raised, including:

- lack of available Employment Services Assessment (ESAt) appointments
- a shift to phone and video assessments over more effective in-person assessments
- assessors lacking the necessary expertise to assess a range of disabilities.

I know of several times when a physiotherapist was assigned to assess a person with a non-physical disability. When I attend the assessments as a support person I can advocate for my client when faced with this situation. Sometimes clients may feel uncomfortable and don't always disclose everything when there is no effort made to put them at ease, and the assessor doesn't have the right training, or is inexperienced, or just doesn't ask the right questions.

- Practitioner, Disability Employment Services

It is critical that the issues with the assessment process are fixed. If the assessment is not accurate, people may be referred to an unsuitable employment program and risk being under-employed or placed in employment that is beyond their capacity. If the initial assessment is improved, less time and funding will need to be spent on re-assessments, and more on achieving education and employment outcomes.

Sometimes we have people come to us assessed at a level 2 but have capacity at a level 4. We then have to send them to get functional capacity assessments to have the level changed but this is such an expense. It should be done accurately the first time.

- Program Manager, Disability Employment Services

Additionally, the requirement for a new ESAt at the 78-week program review is administratively burdensome. A majority of participants who have their program review conducted with Mission Australia go on to have their time in the program extended in line with the ESAt recommendations. This requirement should be reviewed with the aim to reduce cost and administrative burden for both the provider and participant where feasible.

Mission Australia notes these issues have previously been raised in government consultations regarding both mainstream employment services and DES in recent years ⁹ ¹⁰ and are consistent with findings from the *Mid-term Review of the Disability Employment Services (DES) Program (Mid-term Review)* commissioned by the Department of Social Services in 2020.¹¹

⁹ Mission Australia, 2018. The Next Generation of Employment Services - Employment Services Review.

¹⁰ Mission Australia, 2016. New Disability Employment Services from 2018.

¹¹ BCG, 2020. Mid-term Review of the Disability Employment Services (DES) Program.

As noted above, there should also be more flexible movement between supported employment through Australian Disability Enterprises and employment in the open market.

What employment services and supports would most help people with disability?

Building a genuine, positive rapport between a provider and participant is a critical foundation for achieving education and employment outcomes. The future model should mandate and facilitate a person-centred approach to case management, which is recognised in the research literature as best practice and originated in the disability sector.¹² The main features of the approach include:

- the participant is at the centre of the case plan, and it is developed with them, not for them
- family and friends are involved in a meaningful way
- a collaborative partnership between the participant, their family, and the provider
- the person's whole of life, including strengths and resources, is taken into account and fully considered and understood
- continual listening, learning, and adapting support interventions.¹³

We need to focus more on the person's strengths and skills as well as account for the conditions affecting them.

Program manager, Disability Employment Services

Alongside the core activities to build participant capacity and capability to secure employment, such as resume writing and interview skills, there needs to be a greater appreciation of the psychosocial dimensions of the participant's wellbeing. Many participants have poor self-image and self-esteem, related to their medical condition, period of unemployment and experiences of discrimination and disadvantage. For people who are very long-term unemployed, there may be concurrent issues such as homelessness, family violence and contact with the criminal justice system. While employment services cannot address some of these complex issues alone, it is unlikely education and employment outcomes will be achieved for these participants without being better supported and resourced to connect with the broader service system, for example the NDIS and housing services.

¹² Moo, A., Bywood, P., Clark, B., & McMillan, J., 2021. Best Practices for Person-Centred Case Management, https://research.iscrr.com.au/__data/assets/pdf_file/0010/2652715/298_Person_centred-case-management_FINAL.pdf.

¹³ Moo, A., Bywood, P., Clark, B., & McMillan, J., 2021. Best Practices for Person-Centred Case Management,

https://research.iscrr.com.au/__data/assets/pdf_file/0010/2652715/298_Person_centred-case-management_FINAL.pdf. ¹⁴ Tanton, R., Dare, L., Miranti, R., Vidyattama, Y., Yule, A., & McCabe, M., 2021. Dropping Off the Edge 2021: Persistent and multilayered disadvantage in Australia.

 $https://static1.squarespace.com/static/6170c344c08c146555a5bcbe/t/61958bf805c25c1e068da90f/1637190707712/DOTE_Report+_Final.pdf$

Job seekers go through greater stress and change when unemployment has been very long term and generational. We need extra assistance for job seekers who are in long term unemployment. They don't have a lot of resources available. In my area we can access counselling, food, and assistance with bills for participants, but we struggle with securing affordable and safe housing.

- Practitioner, Disability Employment Services

Given this, reform of the DES program and its funding arrangements should allow for greater time to be allocated to relationship building between providers' staff and participants, especially those experiencing long-term disadvantage or who have complex needs. Our general observation is that building a trusting and respectful relationship between staff and participants is the best of way of helping people to develop the confidence, skills, and enthusiasm to engage and achieve their goals.

As detailed later in this submission, there is strong evidence that building human capital is more effective than rapid placement 'work first' approaches. A greater emphasis on sustainability of employment rather than speed to placement needs to be struck in the future model. Practitioners are often preoccupied with compliance and have concerns about the time available to provide the level of support, career guidance, training and engagement with employers required to overcome some participants' multiple barriers.

What employment services and supports would most help young people?

Strong consideration needs be given to how flexible pathways can be created for young people still in school and for young people once they leave.

Work experience opportunities for young people with disability need to be considered significantly prior to the end of high school. In general, the more employer contacts that a young person receives at school, the higher likelihood that they will be engaged in education, employment or training at the ages of 19-24 and that they will earn more. This can be aided by high-quality career guidance that helps young people to identify their career goals, navigate an uncertain jobs market, and connect them with training, work experience and employment assistance.

One pathway that can be expanded for young people is through amending the Eligible School Leavers criteria to include all students with disability as opposed to only students with "significant disability". ¹⁶ In Mission Australia's Young, Willing and Able Youth Survey Disability Report 2019, respondents who indicated that they had disability reported part-time work at lower rates (31%) than those who reported

¹⁵ Nahum, D. and Stanford, J., 2020. Briefing paper: 2020 Year-End Labour Market Review: Insecure Work and the Covid-19 Pandemic. The Australia Institute.

 $https://d3n8a8pro7vhmx.cloudfront.net/theausinstitute/pages/3411/attachments/original/1609197941/Year-End_Labour_Market_2020.pdf?1609197941.$

¹⁶ Australian Government, 2020. Disability Employment Services Eligible School Leaver Guidelines v1.2, https://www.dss.gov.au/sites/default/files/documents/03_2020/des-eligible-school-leaver-guideline.pdf.

no disability (44%). This is despite young people with disability having reported plans to get a job after school at higher rates than their peers with no disability (40% compared with 33%).¹⁷ These findings highlight that young people with disability want to work and would benefit from support to reach their employment goals. In particular, after-school jobs which are an important foundation for future work success should be covered within the scope of DES.

There is an opportunity for closer collaboration between the NDIS-funded School Leavers Employment Supports (SLES) and DES, where it aligns with a young person's employment goals. The SLES program has been established to support young people with disability in transitioning from school to work. It provides support over two years to build up skills and confidence and gain employment through individualised supports. Under current program settings, it does not link in with DES; this is a missed opportunity. Earlier engagement of SLES clients with the DES program could help to focus activities within SLES to better support young people in their career goals. For example, a young person who wants to work in hospitality could be supported to understand what employers will look for and to gain relevant qualifications and work experience to achieve good employment outcomes once they graduate from the SLES program. It has the potential to replicate the benefits of the Transition to Work (TtW) program but tailored for young people with disability. TtW is recognised as an effective pre-employment program for young people who are facing barriers to entering the workforce to pursue employment or further education.¹⁸

What support do employers need to attract, employ, and retain people with disability?

Employers need to have confidence in the government-funded employment services system (as opposed to the private recruitment industry) as an avenue for recruiting employees. The latest publicly available data indicates employers' use of employment service providers in recruitment is low and has steadily decreased between 2011-2015. The reported experience of some employers is that employees are not job ready and that engaging with employment services can be a 'waste of time'. This underscores the importance of the points raised in the previous section.

There needs to be a comprehensive look at the incentives and disincentives influencing current and prospective employers' engagement with the system. Research by the Australian Government shows that while most Australian employers are open to hiring people with disabilities (77%), a much lower

¹⁷ Hall, S., Fildes, J., Liyanarachchi, D., Plummer, J., & Reynolds, M., 2020. Young, Willing and Able: Youth Survey Disability Report 2019. https://www.missionaustralia.com.au/publications/youth-survey/1610-young-willing-and-able-youth-survey-disability-report-2019/file.

¹⁸ Department of Education, Skills and Employment, 2021. Transition to Work Final Evaluation Report, https://www.dese.gov.au/transition-work/resources/transition-work-final-evaluation-report.

¹⁹ KPMG, 2016. The Australian recruitment industry: a comparison of service delivery, report for the Department of Employment, https://www.dese.gov.au/download/6500/australian-recruitment-industry-accessible-version-august-2016-final/10084/document/pdf.

²⁰ BCG, 2020. Mid-term Review of the Disability Employment Services (DES) Program.

proportion (35%) demonstrate behavioural commitment to doing so.²¹ Financial and in-kind incentives such as access to wage subsidies, workplace adjustment funding and education and support services are examples of measures that can assist employers to take that next step.

Our practitioners have found that having the time to build and nurture relationships with employers is important and generates greater faith when suitable job candidates are put forward. However, this process is undermined by the effects of mutual obligation requirements around job applications and limitations on time able to be spent on relationship building, as outlined in the section on mutual obligations below. Combined, these factors have resulted in employers being inundated with unsuitable applications and becoming frustrated with the DES program.

More broadly, the DES program reforms should be complemented by Government-led initiatives to drive cultural change with employers and throughout workplaces in Australia more broadly to attract, employ and retain people with disability. For example, through awareness raising campaigns on the value of employing people with disability or addressing the lack of appropriate entry-level positions for young people, particularly those with a cognitive impairment.

The Government must also consider the changing nature of the Australian labour market, driven by structural changes such as digital transformations, demographic shifts and moves to greater remote/flexible working, which has accelerated with COVID-19. This presents opportunities and challenges for people with disability and employers need to be encouraged to consider and adopt various work arrangements, such as remote working/flexible work suited to people with a disability.

How do we best tailor mutual obligation requirements to increase the likelihood of people with disability finding work in the future?

In general, our view is that mutual obligations as expressed through the Targeted Compliance Framework (TCF) form a punitive compliance regime that causes people to disengage from preemployment and employment services, rather than supporting them to build their skills and work towards employment. A recent survey of 600 jobseekers found only 13% believe mutual obligations are helping them find paid work.²² The threat of having payments suspended or cancelled is a significant barrier to people genuinely engaging with employment and pre-employment programs. In addition, the actual suspension of payments can have very harmful consequences including an inability to pay for daily living expenses, including rent. We have a strong position that it should be removed entirely from pre-employment programs such as ParentsNext.

In the context of DES, we have additional specific concerns that the TCF promotes quantity over quality, leading to unintended consequences that run counter to the aims of the program. For example, the focus on meeting a set amount of job applications, rather than emphasising quality applications, is not

²¹ Department of Social Services, 2018. Media release: Businesses are missing Out, https://formerministers.dss.gov.au/18218/businesses-missing-out/.

²² Anglicare Australia, 2021. Asking those who know: A study of Australians on Centrelink payments, https://www.anglicare.asn.au/wp-content/uploads/2021/11/Asking-Those-Who-Know-Final-Report.pdf

conducive to achieving long-term employment outcomes. This is supported by a large body of evidence that indicates labour market programs that build human capital through education and training have more sustainable long-term outcomes than rapid placement 'work first' approaches.²³ Additionally, our practitioners find employers are frustrated by the number of unsuitable job applications they receive as a result of the mutual obligation requirements.

We would prefer DES and other employment programs to focus on ensuring that employment services assist people to find good-quality employment, rather than compliance and enforcement. Given the current regime, the ultimate decision to suspend or cancel income-support payments resting with Services Australia and not the provider is appropriate and should remain the case. It has reduced the level of antagonism towards practitioners and is more aligned to supportive practice. However, we still have a dual role supporting people with disability into employment and undertaking mutual obligation compliance – roles which we believe should be mutually exclusive. We therefore support the recommendation in the *Mid-term Review* that the provider role in mutual obligations oversight be further minimised and replaced with oversight by either Services Australia or a third-party provider.²⁴

How can funding arrangements incentivise good work outcomes?

Mission Australia supports a model that places employment outcomes at the centre and aligns revenue with performance. The current mix of service and outcome fees strikes the right balance. The changes in 2018 that introduced a 4-week outcome payment to replace job placement fees, and the 52-week outcome payment to encourage strong employability were positive reforms.

To ensure providers of all sizes can continue to operate sustainably, we support a future model that maintains a mix of service and outcome fees. Any shift from the current 50:50 split in fees would need an appropriate adjustment of payment levels in line with any shifting of increased risk to providers. The Government should undertake further consultation with the sector once it has identified its preferred funding arrangement(s) to ensure the viability of the sector and minimise unintended consequences.

How do we drive high quality services and supports?

Address market saturation

The 'open market' model has proved unsuccessful in the current DES contract. The removal of caps on provider market share in 2018 has led to provider numbers tripling.²⁵ This has had the perverse effect of driving time, resources, and expenditure towards securing caseloads through advertising and marketing

²³ Thomas, M. (2019). Reforming employment services. Department of Parliamentary Services, Parliament of Australia, https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/BriefingBook46p/Emplo ymentServices.

²⁴ BCG, 2020. Mid-term Review of the Disability Employment Services (DES) Program.

²⁵ BCG, 2020. Mid-term Review of the Disability Employment Services (DES) Program.

and away from the core business of securing employment for participants.²⁶ It also favours larger providers with additional employment service contracts to supplement their business and limits referrals to smaller providers. Additionally, the introduction of minimum caseloads as low as one encourages providers to enter areas with thin markets and increases the risk of provider failure and market instability.

The current market environment poses challenges to achieving scale and impacts the ability of providers to secure qualified practitioners and provide them with appropriate supports and development opportunities. Additionally, it strains capacity to build an effective relationship with employers as they are being continuously engaged by a range of providers. Investment in key projects with employers is often not feasible due to low caseloads. As mentioned previously in this submission, the ability for providers to build and maintain productive relationships with employers is critical.

The future model should look at measures to ensure each Employment Service Area (ESA) is not over serviced by providers. Instead, each ESA should strike the balance of having sufficient participants requiring support with the number of providers whilst maintaining healthy competition and consumer choice.

By removing the 'open market' model in favour of returning to a market share model, providers would successfully bid and secure a percentage of the market share for their ESA. In our experience, this ensures adequate supply of service to participants, with ample choice and control for participants amongst the successful providers, whilst also maintaining business viability of providers. This also limits the risk to participants of discontinuing service where a provider might leave the service and hand back a contract where they are no longer viable.

On the Sunshine Coast we have around 15 providers on the same street, some even next door to each other. It is not sustainable.

Program Manager, Disability Employment Services

Replace star ratings with a system more reflective of quality performance

A system that accurately reflects the quality of the service delivered is necessary to drive sector-wide performance improvements and provide participants with increased information to make informed decisions. However, as the *Mid-term Review* highlighted, star ratings don't have a strong correlation to performance, are highly complex, and participants are largely unaware of them and how to interpret them.²⁷ This is corroborated by peak industry bodies, such as Disability Employment Australia, which have advised that star rating results are not a significant deciding factor for participants when selecting a provider, rather location and proximity to participants address are more influential.

²⁶ BCG, 2020. Mid-term Review of the Disability Employment Services (DES) Program.

²⁷ BCG, 2020. Mid-term Review of the Disability Employment Services (DES) Program.

Throughout the current contract, the star rating performance model has become virtually obsolete due to the continual unreliable availability of results. Our practitioners have noted the same issues as those raised in the *Mid-term Review* and raised additional concerns about the administrative work involved to maintain the system and its vulnerability to manipulation, lack of access to performance data and misalignment from the core work with participants.

Returning to a market share model would support the implementation of a targeted performance framework, where successful providers in an ESA have an expected market share of participants, and a set outcome target aligned with the market share awarded through tender. The Outcome Performance Targets framework used in the Transition to Work could be used as a model for the DES program.

Setting outcome targets (for 4-, 13-, 26- and 52-week employment outcomes) for providers to meet relative to their market share and caseload numbers, reviewed on a quarterly basis to allow for changes in caseload numbers, drives sustainable employment outcomes, whilst also removing the ability of providers to manipulate star rating/performance data in a way that may provide a disservice to the participant and provides unreliable performance data in a competitive model.

The star rating becomes the focus when it should be about helping the clients and moving them forward. We end up doing so much to bring up the star rating, but it doesn't reflect what we do for clients. I would rather have targets which are going to move the client forward.

- Program Manager, Disability Employment Services

Strengthen the partnership between providers and Services Australia

Prior to the 2018 reforms, practitioners felt our relationship with Services Australia was in a much stronger position. There was greater access and collaboration with staff who specialised in the employment services programs, which was founded in the agency's former role of managing referrals to providers. Our practitioners now report difficulties in reaching the right people regarding issues such as reassessments, ongoing support, and often encounter gatekeepers with no knowledge of employment services or who do not know how to direct them internally.

While some practitioners have access to Employment Services Liaison Officers, this does not appear to be consistent across Services Australia branches. Mission Australia would like to see a future model that establishes a nationally consistent process for how providers interact and receive support from Services Australia to address participants' needs and achieve their education and employment outcomes.

How do we measure success?

Achieving sustainable employment outcomes should be the defining measure of success. What is considered a sustainable employment outcome should be flexible to account for different factors such as career trajectories, national and local job markets, type of industry they are entering, and the impact

of future work trends. For example, this could look like part-time work, multiple jobs but with relatively consistent employment, periods of volunteer work and career progression opportunities.

At Mission Australia we use the Personal Wellbeing Index²⁸ - a validated tool for measuring people's satisfaction with their own life - in addition to service-specific outcome measures to assess changes in people's wellbeing as their progress through our services. All providers should be encouraged to adopt a similar evidence-based wellbeing measurement tool to enhance their practice. Over time this should be built into the DES model as part of service delivery, but it should not be linked to fees. The intent of its introduction would be to better understand and draw the link between wellbeing and employability, and to support holistic person-centred responses, such as to encourage DES practitioners to make referrals to address other life challenges (which can also be barriers to employment).

²⁸ Australian Centre on Quality of Life, n.d. Measures - Personal Wellbeing Index, http://www.acqol.com.au/instruments#measures.