Listen Up Music’s submission to the Productivity Commission’s Draft Report into Mental Health

Submitted on behalf of Listen Up Music and their stakeholders.

23rd January 2020

## **Executive summary**

The following document contains the Listen Up Music’s response to the Productivity Commission’s Draft Report into Mental Health. We commend the Productivity Commission for their considerable and high quality undertaking.

There is much in the report that Listen Up Music agrees with. We support the Productivity Commission’s arguments that the mental health and suicide prevention systems are full of gaps and duplication, and that there is much that can be improved. We support the need for rethinking the medical model of care and considering non-clinical alternatives. These alternatives should focus on prevention and early intervention both in the life stage and stage of illness. Approaches that build community capacity are important and the tailored approaches that PHNs have been undertaking need to be fully assessed for their effectiveness.

We agree that there is a need to emphasise the importance of lived experience in mental health promotion and suicide prevention. Mentoring, peer-work approaches and the work undertaken by lived experience advocates provide access to a high standard person-centered approach that targets the true needs of those at risk of mental health problems. That being said, there needs to be deeper opportunities for involvement of those with a lived experience. Opportunities should be paid and those with a lived experience should be valued for their contribution.

In considering challenges regarding employment, Listen Up Music agrees that disengagement is a contributor to poor mental health. The Productivity Commission should consider the changing nature of employment, particularly the ‘gig economy’ and how this may drive disengagement from employment or mental health issues. Certain populations are more susceptible to unstable employment and these target populations should be considered. Listen Up Music’s stakeholders in the music industry are just one example where the nature of work contributes to poor mental health outcomes including rates of suicide ideation six times greater than the general population[[1]](#footnote-1).

In relation to stigma, Listen Up Music agrees that more needs to be done to change the culture around how we talk about mental health and suicide. Before this can occur, however, we need to better understand how stigma is related to mental health outcomes and target our efforts to these factors. Fostering community connections and inclusion is the approach we take at Listen Up Music and through these deep relationships, stigmatising beliefs are reversed and people feel understood and supported[[2]](#footnote-2). There is value with prevention and early intervention approaches.

Listen Up Music commends the Productivity Commission in trying to understand and better model the way funding is managed in mental health. We see the impact of short term funding and the drain on services to continue to find sources of funding. Any remodel of funding should consider the various evaluations of the Primary Health Network system that is currently implemented.

On evaluation and data, Listen Up Music urges the Productivity Commission to consider expanding the National Mental Health Commission’s proposed role to one of leadership in evaluation. We urgently need a standard approach to evaluation in service delivery and this should include an open data sharing strategy. This should include data shared by the government and sharing of any evaluation undertaken by services. When information is open to all, we will see best practice as interventions are tailored to work.

These points and more are expanded on below. In conclusion, Listen Up Music supports the Productivity Commission’s Draft Report.

## **Background**

Listen Up Music is a mental health promotion charity, with services specifically targeted to those who work in the music industry and those who engage with music. Through its music-focused events and education, our vision is to foster an inclusive community of musicians and music lovers who share an appreciation for music’s power to bring people together and enhance wellbeing.

Listen Up Music works at the prevention and early-intervention stage of mental health issues. Although we recognise that promotion of mental wellbeing reduces the risk of suicide, Listen Up Music does not specifically target suicide prevention. We advocate for service access without providing specific crisis or support services ourselves. Our main activities involve education and bringing people together to form communities that protect against risks for mental health challenges.

Listen Up Music’s goals form three tiers; (1) community and connection, (2) mental health and wellbeing and (3) organisational longevity. Our discussion on the content of the Productivity Commission’s Draft Report is focussed around these three tiers.

Through the changes identified in the draft report and others suggested below, Listen Up Music supports any action that boosts community connectedness through shared passions. We advocate for a focus on early intervention and stigma reduction through education, peer work and modelling behaviour that maintains wellness using lived experience.

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## **Response to the draft report**

### Current landscape

#### The Productivity Commission outlines various elements that drive the poor outcomes in promoting mental health. Many of these align with Listen Up Music’s objectives such as stigma-reduction, a focus on prevention and early intervention and assisting people to access support. Listen Up Music agrees that the key factors driving poor outcomes (listed in volume 1 of the draft report) represent the difficulties that direct service providers and people with a lived experience face in supporting mental wellbeing. We identify several of these outcomes in more detail below:

### Community and connection

#### Non-clinical alternatives

Further to the above, the draft report highlights the importance of non-clinical health services. Listen Up Music agrees that an overreliance on services based on the medical model has left many people experiencing mental illness without appropriate care. We agree that while there are some similarities between mental and emotional conditions and physical conditions, there are unique aspects about managing mental health. These include the importance of community connection and social wellbeing. Listen Up Music aims tofoster a sense of community and shared experience, and this adds value in the prevention and early intervention of mental health issues. There is a quote from page 30, Volume 1 which sums this up perfectly:

*For all people with mental illness, social inclusion — the capacity to live contributing lives and participate as fully as possible in the community — is a necessary, but too often neglected, part of a recovery plan.*

With any approaches that are located at the self-help tier specified in the stepped care model (e.g. page 18, volume 1), Listen Up Music agrees that adjustment may be required to facilitate participation in the community and community events. Peer work can assist with this, as those with a lived experience accompany and support those at risk or with acute symptoms to participate in community activities. This is discussed further below.

#### Lived experience

The Productivity Commission highlights the need to implement person-centered care across the mental health system. This is an important aim that should be highlighted to a greater extent within the report. The need to better engage those with a lived experience and value the experiences of those within the mental health system will not only contribute to a reduction in stigma within healthcare services but also increase the effectiveness of any intervention.

The mental health and suicide prevention sectors have increased their involvement with those with a lived experience over the past 10-15 years at a substantial rate. However this increase must be considered with a starting point of almost no inclusion. Currently one of the most popular and frequent forms of engagement is around advisory bodies and asking for input on semi- or completely developed documents, policies, procedures and programs. Now is the time to encourage the sector to consider the next step in engaging those with a lived experience in their own care and the care of others.

There are established and emerging organisations who put lived experience front and centre of all that they do. Organisations like Listen Up Music who not only engage with, but are run by people who have directly experienced the very thing they are trying to prevent. They value the voices of direct experience, including remuneration of time spent working in the space, something that historically has been rare. Listen Up Music sees that person-centered care goes hand in hand with developing a peer workforce.

#### Engagement and Employment

The Productivity Commission rightly focuses on the importance of employment and engagement for reducing mental health challenges. Listen Up Music agrees that being disengaged in education and/or employment puts people at risk of mental health struggles. However, we do not agree that simply getting them engaged again will reduce the financial and personal burden of mental health challenges.

While employment may reduce the financial burden of these people on the social welfare system, a holistic approach needs to be taken which also treats the underlying causes of their initial disengagement in order to obtain long lasting change.

There is little examination by the Productivity Commission of the different types of work (casual, part-time etc) or industries when describing the need for people to remain engaged or to re-engage in the workforce. Further, as specified in the report, there are specific challenges that relate on a personal level (such as bullying and harassment) but there are also structural issues. Any approach that helps those who have a mental illness or who are recovered to remain engaged or to re-engage in work should consider the impact of short term, contract work that we are increasingly seeing in the workplace (termed the ‘gig economy’). This issue is particularly prevalent in the music industry and Listen Up Music stakeholders frequently report that these challenges are one of the biggest impacts on their mental health.

When people become disengaged with employment, and as stated in the report, there is a need to better manage mental health issues within the workplace. We know this all too well and believe that these challenges can be overcome both through awareness raising in the workplace and also through mentoring and peer support. Listen Up Music agrees with the Productivity Commission’s immediate recommendation for developing codes of practice which assist employees better manage their psychological risks that exist within their line of work. This tailored approach will help to overcome industry specific challenges such as those identified in the next section.

### Mental health promotion

#### Target populations

Missing from the Productivity Commission’s assessment is the need for targeted interventions for various priority groups. There is some mention of the need for Culturally and Linguistically Diverse and Aboriginal and/or Torres Strait Islander focussed interventions/services however other at-risk groups similarly require specific approaches to maintain wellness.

Listen Up Music has close relationships with those in the music industry and they report contributing factors for mental illness and suicide which are industry specific. This group face difficulties such as unstable employment (including lack of benefits such as superannuation), disruptive hours of work (such as late nights) and are highly mobile, meaning they are often isolated and disconnected from their families, communities and support networks. Many of the approaches proposed in the draft report will be ineffective for combating mental illness in this population.

Listen Up Music urges the Productivity Commission to include an emphasis on the need to target interventions and approaches to groups who have specific needs or on an industry basis. The PHN approach, with localised spending on tailored where the community needs lay, has been a welcome change to the way services are funded. Listen Up Music highlights that the suggested funding model will change the way funds are distributed and therefore may impact these tailored interventions which target small and specific at risk populations. More on the funding model below.

#### Stigma reduction

Listen Up Music supports the Productivity Commission’s position that treatment effectiveness can be boosted by changing the culture around how Australians understand and discuss mental health issues. There is much discussion around ‘reducing stigma’ in the sector with little understanding of how stigma is created or maintained. Listen Up Music suggests that the Productivity Commission include an examination of stigma in the responsibilities of the National Mental Health Commission and their role as a national driver of the agenda for combatting mental illness and suicide. This examination should include:

* Defining stigma and calling out the elements that make up stigmatising beliefs (i.e. negative attitudes and beliefs about those who have direct experience with mental illness and/or suicide and the levels these occur).
* Supporting or conducting research that identifies what maintains or changes these beliefs and attitudes.
* Strategies for action to shift the culture of stigma.[[3]](#footnote-3)
* Funding evaluation of services who use approaches to combat stigma through methods such as community education or more wide scale population campaigns.
* Understanding how reducing stigma directly relates to the prevention of mental illness and suicide.

We also agree that a stigma reduction strategy should target different messages for different audiences.

Further, the Productivity Commission suggests that stigma reduction should focus on illnesses that are misunderstood such as schizophrenia and borderline personality disorder. While Listen Up Music agrees that there remains significant stigma towards people who experience these disorders, they affect a relatively small part of the population compared with other, more prevalent illnesses. In a 12-month period, one in 16 Australians experience mood disorders[[4]](#footnote-4) as opposed to less than one in 200 Australians who experience a psychotic illness[[5]](#footnote-5). Therefore, Listen Up Music encourages the Productivity Commission to focus their recommendations on stigma reduction around the more common mental illnesses such as depression and anxiety.

#### Need for early intervention

The Productivity Commission reports that *75% of those who develop mental illness, first experience mental ill-health before the age of 25 years*. This represents a key prevention target area and Listen Up Music supports the Productivity Commission’s emphasis on early intervention in preschools, schools and tertiary institutions. Despite this, there are further considerations when it comes to thinking about early intervention.

Age is not the only factor to consider for early intervention. Approaches that target preventing symptoms from developing or worsening (for mild or early symptoms) are essential. As detailed in Figure 1.1 of volume 1 of the draft report, 5.8 million Australians were estimated to be at risk of mental illness in the 12 months prior to 31 March 2019. The largest group of Australians with mental illness experience a mild condition and it is both the at-risk and mild symptoms group that Listen Up Music target. With the current healthcare landscape, it is this group of people who often do not qualify for treatment due to their illness severity and hence they fall through the gaps. Further, the draft report tends to focus on those who have mental illness requiring medical treatment, which represents a smaller group of Australians. While this group have increased impacts on their ability to contribute to society and therefore may represent an increased cost burden, there is little consideration in the report of the gains to be made through early intervention for those with developing or mild symptoms, preventing these conditions becoming more severe and impacting, despite their age. While intervention while young is important, early intervention should also cover intervention early on in the progression of the illness.

### Governance and structure

#### Funding models

Listen Up Music supports the Productivity Commission’s view that re-prioritisation of spending is just as important as increases in spending. We understand the limitations on government funds and, as most not-for-profits would agree, getting the most out of these limited funds is important. It is clear that current funding models have limitations that directly impact those with a lived experience and the organisations who provide services to them.

As stated in the report, longer term funding arrangements need to occur so that organisations are able to implement and fully evaluate their services. Currently evaluation and tracking of long-term goals is difficult under funding arrangements which usually span 12 months. As we have seen in the roll out of the National Disability Insurance Scheme (NDIS), government funding should rarely be relied on in delivery of services, however it does provide valuable funds for the administration of services, minimising costs passed on to service users. Under the NDIS, many services have struggled or closed completely due to their inability to cover these administration costs under the limitations of the funding model[[6]](#footnote-6). Learnings from the NDIS roll-out should be fully incorporated into any change of the funding model for mental health services.

Organisations spend considerable time and resource undertaking fundraising activities as well as applying for short-term philanthropic grants. This takes personnel away from activities that directly help those with a mental illness and their carers. It also becomes a cycle as people are employed to raise money for an organisation, therefore more money is needed to find the money that employs those engaged in fundraising and detracts them from providing services. As a long term goal, Listen Up Music proposes that the entire funding landscape be re-examined to identify long-term funding sources outside the government funding pool and to direct these funds to services who have demonstrated effectiveness.

Any funding model needs to consider payment for services by those with a lived experience. Currently, most opportunities regarding inclusion of people with a lived experience are on a voluntary or paid participation basis and this rarely recognises (in total) the contribution, both in time and expertise, that these people make in mental health and suicide prevention. Listen Up Music proposes that more paid roles are made available for people with a lived experience. This will enable these people to continue to do the valuable work that they do and and stay true to their experience. There is a risk that becoming an employee with a lived experience may discourage the person with a lived experience to speak up and challenge decisions when they contradict knowledge obtained from direct experience. This situation rarely occurs when the lived experience representative is engaged in a voluntary capacity as there is no threat of losing paid employment.

A further limitation is that both funding models do not consider the preventative activities that stop people from needing health services. Funding needs to be allocated to prevention and not just intervention and postvention services. Prevention services have unique challenges of being hard to measure outcomes (how can you prove your activity prevented illness?) and this hampers efforts to win funding. Prevention has an important role in maintaining good mental-health and therefore stopping any cost burden by illness.

In consideration of restructuring/removing PHNs, it needs to be made clear that this should only occur pending the outcomes of the evaluations relating to PHN activities. Due to the youth of this approach, evidence of effectiveness or ineffectiveness is yet to be released and therefore defunding these bodies now or in the immediate future would be counterproductive. The PHN model has allowed for localised services that are tailored to the needs of community and on the ground, there are some benefits to this. Listen Up Music encourages the Productivity Commission to reconsider their suggested approach to be contingent on the outcomes of the evaluations being undertaken in PHNs in order to better assess their progress and therefore value.

#### Data

There are limitations on government collected and owned data through the constraints of the Privacy Act and legislative change is slow and difficult. The value of undertaking these types of changes should be considered against the difficulties in achieving this. There is currently action within the Commonwealth government to link useful datasets[[7]](#footnote-7), and on a state level to improve suicide reporting and analysis.[[8]](#footnote-8) Unfortunately,this process has been slow and data is not readily available to the organisations who need it most in order to tailor their services and boost their effectiveness.

Listen Up Music encourages the Productivity Commission to make explicit that data needs to be made available to service providers. Most data is currently only available at a government or research-institution level. This data would be invaluable to service providers who could benefit from being able to access data about their users as well as rates of illness (in real-time) in their local community in order for timely community action. Safe and effective data-sharing should be accompanied by a framework for upskilling these organisations to be able to interpret and make use of the data. By doing so, organisations can become self-sufficient in using data to inform their program decisions and be better equipped to evaluate the impact of their services. Evaluation at the service provider level is misunderstood and frequently done poorly. This should be considered in any evaluation strategy.

**Evaluation and research**

The draft report raises the possibility of new surveys into the mental health of Australians. Before considering undertaking large and expensive surveys, Listen Up Music recommends the Productivity Commission consider the viability of follow up through the MBS dataset. In this way, people who access MBS related services could be followed up in the short, medium and long term in order to assess what care they received and its effectiveness.

For capturing the needs of those who do not progress through an MBS pathway, services need to be encouraged to undertake evaluative action and make their findings public. The Productivity Commission highlights the need for ongoing evaluation during the suggested staged reform. This is essential to ‘learn as we go’, regularly evaluating progress and adapting the reform approach as we go. In addition, service providers will need assistance in adapting to a high standard of evaluative practice. There is a position for the National Mental Health Commission to develop evaluation standards that ensure any activity is able to be compared across services.

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### Response to specific recommendations

##### DRAFT RECOMMENDATION 5.9 — ENSURE ACCESS TO THE RIGHT LEVEL OF CARE

Listen Up Music wholly endorses the adoption of the stepped care model. We also recommend that prevention is included more prominently in this model, with a focus on wellness-maintenance as an effective form of action to combat mental health issues and suicide in Australia. Tailored solutions should consider more than just cultural needs, and look at the needs of specific population groups and their unique challenges such as the music industry and challenges associated with the gig economy, a mobile and possibly isolated workforce, and other sector specific challenges.

##### INFORMATION REQUEST 5.2 — MENTAL HEALTH TREATMENT PLANS

The Productivity Commission is seeking information about the specific needs of Mental Health Treatment Plans (MHTP). Listen Up Music believes that those with mental illness type symptoms, who are below clinical thresholds, should be able to access structured support in order to prevent illness from developing. This early intervention approach will catch people before their condition becomes disruptive, keeping them in employment and connected to their social supports. Alternative treatments to psychological and psychiatric services should be included in the MHTP that address community connectedness and social wellbeing. These are protective barriers to mental illness and should be included as a priority. Some particular services could be mentoring programs, contact with peer workers and support to attend community groups.

Listen Up Music encourages the Productivity Commission to investigate or recommend the investigation of an NDIS type service arrangement where a rebate amount is set and the participant is able to choose (within a defined but broad list) of eligible supports that they are able to devote their rebate to.

##### DRAFT RECOMMENDATION 12.1 — EXTEND THE CONTRACT LENGTH FOR PSYCHOSOCIAL SUPPORTS

Listen Up Music supports this recommendation. It would reduce many issues the sector currently faces by having at least a 5-year term on funding, particularly around possible changes in priority during changes of government.

##### REFORM OBJECTIVE: Increased support for the wellbeing and role of carers and families of people with mental illness

Listen Up Music supports the sentiment of this reform objective. We recommend that the Productivity Commission consider identifying a reform area for the support for the psychological and/or wellbeing related needs of carers. Carers often put their own wellbeing needs aside in order to care for others and this can lead to social isolation. If left to develop, these situations increase the risk of developing mental illness. Supporting the psychological and/or wellbeing related needs of carers will ensure that carers do not become service users in their own right (due to mental illness). It is Listen Up Music’s position that prevention is the best intervention.

##### REFORM OBJECTIVE: Income support for people with mental illness and their carers that is accessible and does not discourage work, study or volunteering activity

The recommendations under this reform objective are centered around keeping people in work. As discussed above, Listen Up Music recommends that the Productivity Commission explore the changing nature of work and its impact on mental health and the ability for people to stay engaged in work. There are increasing barriers to entry level employment[[9]](#footnote-9) and an appreciation for these barriers needs to occur before we can expect people to be able to obtain and maintain employment. Unstable work through casual working arrangements or short term contracts, leads to challenges such as inability to secure housing and increases anxiety. These things need to be considered.

##### DRAFT RECOMMENDATION 20.1 — NATIONAL STIGMA REDUCTION STRATEGY

Listen Up Music wholly supports this recommendation. It is in alignment with the direction of the organisation and our belief that generating conversation and increasing a sense of community is healing and protective against mental health conditions and suicide.

##### DRAFT RECOMMENDATION 22.3 — ENHANCING CONSUMER AND CARER PARTICIPATION

As discussed earlier, Listen Up Music supports the meaningful inclusion of those with direct, personal experience. Participation should go beyond the common ‘advisory panel’ and include paid roles where those with a lived experience can share their honest opinion without fear of reprimand.

##### DRAFT RECOMMENDATION 22.5 — BUILDING A STRONGER EVALUATION CULTURE

Listen Up Music supports this recommendation. In addition to that described in the report, there is a role for the NMHC to develop resources and opportunities to upskill community organisations in how to think evaluatively and undertake evaluation of their services. This should then flow to an open data exchange where services are not afraid to report approaches that are not effective in order to better target and focus resources on things that work.

##### INFORMATION REQUEST 22.1 — GOVERNANCE ARRANGEMENTS FOR NMHC

Listen Up Music supports the role of the NMHC to develop frameworks and common approaches, however the evaluation activities should be undertaken by sector experts, providing the funds back to those who are in communities and who understand the landscape in which services operate. In this way, the role of the NMHC is one of leadership only, unless the case can be made that there are cost benefits which outweigh the limitations of knowing the communities in which services operate.

##### DRAFT RECOMMENDATION 25.7 — PRINCIPLES FOR CONDUCTING PROGRAM EVALUATIONS

Listen Up Music supports this recommendation and encourages the Productivity Commission to extend these principles to evaluations undertaken by service delivery organisations. If the sector adheres to the same principles as the National Mental Health Commission does, this will foster the creation of a national minimum dataset on effective (and ineffective) interventions. This evidence base will drive best practice and continuous improvement, reducing duplication.

**Concluding notes**

## Undertaking change in the mental health and suicide prevention systems is no small feat. Improvements proposed by the Productivity Commission are considerable but are very reasonable. These changes have the potential to add value and make a difference to the people who need support to maintain their mental wellbeing. Some changes will not require large amounts of funding and have the ability to have large reaching impacts, such as increasing community and empowering community members to support each other during times of risk. Others are not so simple and require more investigation and consideration of evidence, such as changing the funding model around the use of Primary Health Networks.

## In essence, Listen Up Music supports this draft report.



Ali Taylor | Founder & CEO

W: [www.listenupmusic.com.au](https://nethunt.co/api/v1/track/link/click/5dbfa097a2cf46f0566ed341/1573613175931/?link=https%3A%2F%2Fwww.listenupmusic.com.au%2F)

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1. Van den Eynde J, Fisher A, & Sonn C. (2017). *Working in the Australian entertainment industry: Final report*. Melbourne: Victoria University. Available: <http://apo.org.au/system/files/121961/apo-nid121961-494671.pdf> [↑](#footnote-ref-1)
2. See for example Mohatt, N. V., Singer, J. B., Evans Jr, A. C., Matlin, S. L., Golden, J., Harris, C., Burns, J., Siciliano, C., Kiernan, G., Pellereitti, M., & Tebes, J. K. (2013). A community's response to suicide through public art: Stakeholder perspectives from the finding the light within project. A*merican Journal of Community Psychology, 52*(1-2), 197. Available: [https://www.researchgate.net/publication/237069919\_A\_Community's\_Response\_to\_Suicide\_Through\_Public\_Art\_Stakeholder\_Perspectives\_from\_the\_Finding\_the\_Light\_Within\_Project](https://www.researchgate.net/publication/237069919_A_Community%27s_Response_to_Suicide_Through_Public_Art_Stakeholder_Perspectives_from_the_Finding_the_Light_Within_Project) [↑](#footnote-ref-2)
3. See for example a focus on self stigma and reduction strategies in: Corrigan, P., & Rao, D. (2012) On the Self-Stigma of Mental Illness: Stages, Disclosure, and Strategies for Change, *Can J Psychiatry, 57*(8): 464–469. Available: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3610943/> [↑](#footnote-ref-3)
4. According to the [2007 National Survey of Mental Health and Wellbeing](https://www1.health.gov.au/internet/publications/publishing.nsf/Content/mental-pubs-m-mhaust2-toc~mental-pubs-m-mhaust2-hig~mental-pubs-m-mhaust2-hig-pre) [↑](#footnote-ref-4)
5. As estimated in [2010 National Survey of Psychotic Illness](https://www1.health.gov.au/internet/publications/publishing.nsf/Content/mental-pubs-p-psych10-toc~mental-pubs-p-psych10-exe~mental-pubs-p-psych10-exe-est) [↑](#footnote-ref-5)
6. See for example the Bridges Service at Melbourne City Mission <https://www.mcm.org.au/news/closure-of-bridges-service-at-melbourne-city-mission> [↑](#footnote-ref-6)
7. See for example the Multi-Agency Data Integration Project (MADIP) [https://www.abs.gov.au/websitedbs/D3310114.nsf/home/Statistical+Data+Integration+-+MADIP+-+FAQs](https://www.abs.gov.au/websitedbs/D3310114.nsf/home/Statistical%2BData%2BIntegration%2B-%2BMADIP%2B-%2BFAQs) [↑](#footnote-ref-7)
8. See here for an evaluation of the Victorian Government’s approach <https://onlinelibrary.wiley.com/doi/epdf/10.1111/1753-6405.12725> [↑](#footnote-ref-8)
9. See [Anglicare Jobs Availability Snapshot 2019](https://www.anglicare.asn.au/docs/default-source/default-document-library/jobs-availability-snapshot-2019.pdf?sfvrsn=4) [↑](#footnote-ref-9)