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SUBMISSION TO THE AUSTRALIAN GOVERNMENT

2026 Employment Services Reform Consultation
Department of Employment and Workplace Relations

Extend the existing voluntary work pathway available to long-term income support recipients aged 55 and over to all recipients, particularly those experiencing comparable barriers to employment.

Submitted by:



With endorsement from Single Mother Families Australia

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We are pleased to make this joint submission to the Department of Employment and Workplace Relations (DEWR) consultation on shaping the future of employment services. The submission is made by Caring Futures Strategic Research Collaboration (Western Sydney University), National Shelter, Shelter NSW, the Justice and Peace Office of the Catholic Archdiocese of Sydney, and Dignitas, a leading tenant participation organisation within Sydney's Waterloo and Northcott public housing estates. It has received policy endorsement from Single Mother Families Australia.

We support DEWR's (2026) proposed objective of creating a more responsive, participant-centred system that aligns expectations and support with participants' circumstances, barriers and labour market attachment. In line with this objective, we make the following recommendation:

Extend the existing voluntary work pathway available to long-term income support recipients aged 55 and over to all recipients, particularly those experiencing comparable barriers to employment.

If enacted, this would:

- **Support more tailored, participant-led pathways** by aligning this mutual obligation option with individual circumstances and capabilities rather than age, particularly for participants for whom compliance-based, work-first approaches have been ineffective.
- **Recognise valuable forms of participation** that build confidence, skills, wellbeing, social connection and long-term labour market attachment.
- **Strengthen place-based participation and self-determination** by enabling contribution through community-led activities, including tenant participation in public and community housing, and through culturally safe, self-determined pathways delivered by Aboriginal and Torres Strait Islander community-led organisations.
- **Build community resilience** by supporting participation within community organisations that contribute to local capacity building and resourcing, care initiatives, and climate and circular economy activities in communities experiencing economic and social disadvantage.
- **Deliver a practical, low-cost reform** by expanding an existing policy framework while maintaining expectations of active engagement.

Below, we outline the current policy misalignment underpinning this recommendation and explain how extending voluntary work arrangements would support the Government's employment services reform objectives and broader policy priorities. This is done through responses to three of the nineteen consultation questions on the design of a new employment services system.

1. Voluntary Restrictions Misaligned with Reform

Consistent with findings that work-first compliance approaches do not adequately meet the needs of people facing persistent and complex barriers to participation (House of Representatives, 2023), reform objectives now place greater emphasis on participant circumstances, choice and capability development (DEWR, 2026).

Current policy already recognises the value of this different approach for long-term income support recipients aged 55 and over, who can fully meet their mutual obligation requirements through a choice to undertake approved voluntary work (Services Australia, 2025). This reflects evidence that voluntary work can build capability, confidence, wellbeing and social connection while supporting meaningful participation. Although the commitment to undertake 30 hours of approved voluntary work per fortnight means it is taken up by only a select group of participants, it is a commitment that demonstrates active participation, initiative, and community contribution. It also enables people to contribute in ways that reflect their circumstances, capacities, interests and community connections (SEERC, 2019).

However, younger participants facing similar, and in some cases greater, barriers to participation, many of whom would now be identified within Stream Three, remain subject to tighter voluntary work restrictions, including additional mutual obligation requirements, time limits, and employment-focused expectations. As a result, participants with comparable levels of disadvantage are treated differently primarily because of age.

Evidence presented to the Senate inquiry into jobactive (SEERC, 2019) suggested that these restrictions on voluntary work, combined with a reliance on standardised compliance activities, undermined self-directed participation and its many benefits. This is particularly concerning given evidence that Work for the Dole and other work-first compliance measures have little or no positive impact on social or economic participation, while increasing risks of disengagement and repeated cycling through the welfare system (House of Representatives, 2023; DSS, 2025; DEWR, 2026). Long-term disengagement is, in turn, associated with skill erosion, weakened social networks and reduced wellbeing (RBA, 2020; House of Representatives, 2023). Reflecting these concerns, the *Rebuilding Employment Services* inquiry recommended trialling voluntary work for participants with significant barriers to employment as part of a more tailored and flexible approach to participation (House of Representatives, 2023).

If the future system fails to recognise voluntary work as a legitimate pathway for building capability, participation and inclusion, it risks overlooking the real and meaningful benefits it can deliver. Continuing to restrict voluntary work and assess it primarily against employment outcomes would reinforce the one-size-fits-all, work-first approach these reforms seek to move beyond.

2. Responses to Consultation Questions

The following section positions the submission in response to Questions 8, 15 and 17 of the *Shaping the Future of Employment Services Discussion Paper*.

2.1 (Question 8): How do we change the way that providers and participants engage with mutual obligations to focus on positive engagement that helps people move towards employment?

The change we are recommending would support more positive engagement with mutual obligations by providing a more tailored pathway towards social inclusion and employment, one that better reflects participants' circumstances, barriers and support needs while strengthening participant choice and agency.

2.1.1 Providing a more tailored pathway

Unrestricted voluntary work is already recognised as an appropriate participation option for many job seekers aged 55 and over, because of their circumstances and degree of labour market attachment (Services Australia, 2025). Many other income support participants, particularly those in Stream Three, are now being recognised as experiencing similarly complex, and in some cases greater, barriers to employment (DEWR, 2024).

Extending this option would be a logical and consistent application of the reform principle that participation requirements should reflect individual circumstances, capacity and barriers, rather than a one-size-fits-all approach or arbitrary age threshold. It would also support the reforms' shift towards more personalised, participant-led pathways (DEWR, 2026). Even for participants closest to the labour market, access to this option is unlikely to reduce transitions into paid employment, given the ongoing commitment involved in voluntary work and the higher income associated with paid work (Australian Government, 2023).

2.1.2 Advancing participant agency through self-directed participation

While most income support recipients are unlikely to choose to undertake 30 hours of voluntary work per fortnight, those who do are demonstrating significant initiative and commitment to participation. Voluntary work is also distinct from many other mutual obligation activities because it is inherently participant-directed, allowing individuals to contribute in ways that align with their interests, capabilities and circumstances. This autonomy and self-direction support positive participation outcomes, including engagement and capability development (O'Halloran et al., 2020; DEWR, 2026).

A genuinely empowering system should therefore not merely accommodate this type of participant-led initiative but actively support it. Imposing unnecessary restrictions or administrative barriers on people who voluntarily choose this commitment to participation risks discouraging precisely the sort of agency, initiative and self-directed engagement that the reforms seek to encourage (SEERC, 2019). By contrast, enabling participants to pursue pathways that reflect their individual circumstances is consistent with the objective of delivering more personalised and tailored services (DEWR, 2026).

Voluntary work provides a meaningful form of participation that builds skills, strengthens wellbeing, social connections and supports continued attachment to the labour market (SEERC, 2019; Volunteering Australia, 2023; Fee & Lizier, 2024; AIHW, 2025). This may help reduce the risks of social isolation, long-term disengagement and the erosion of work-related capabilities associated with prolonged unemployment (RBA, 2020). By contrast, compliance-based, work-first requirements have been evidenced to largely fail to address underlying barriers and contribute to disengagement and prolonged cycling through the welfare system (DEWR, 2026; House of Representatives, 2023).

Alongside job search, education, training and other approved activities, extending voluntary work arrangements would enable participants to fulfil mutual obligation requirements through meaningful forms of participation that demonstrate active engagement (DEWR, 2026).

2.2 (Question 15): How can a nationally consistent service respond to local circumstances?

Extending this opportunity to income support recipients on the basis of individual circumstances rather than an arbitrary age threshold would create a more equitable and nationally consistent framework, while supporting forms of participation that reflect local opportunities, community needs and participant aspirations.

2.2.1 Recognise locally relevant forms of participation.

Extending the voluntary work provision would allow a nationally consistent employment services system to respond to local circumstances by recognising locally relevant forms of voluntary participation. This would help strengthen Australia's volunteer ecosystem at a time of growing demand for volunteer-supported services and increasing concern about volunteer recruitment and retention, with impacts felt most directly in local communities (Volunteering Australia, 2023). In doing so, it would align with the objectives of the *National Strategy for Volunteering 2023–2033*, which seeks to expand participation in volunteering and strengthen the capacity of local communities to respond to social and economic challenges (National Strategy for Volunteering Council, 2023).

Extending the voluntary work provision would also align employment services reform with national policy initiatives that have foregrounded the value of unpaid care, which often takes place in volunteer and community contexts yet remains underrecognised, gendered labour. *Working for Women: A Strategy for Gender Equality*, the Australian Government's vision for gender equality, recognises that unpaid care is central to families, communities and the Australian economy, while remaining undervalued and disproportionately undertaken by women (Australian Government, 2024b). It also identifies the need for policy settings that support choice, avoid entrenching inequality, and more fully recognise the economic participation of those performing unpaid care (Australian Government, 2024b). While not all voluntary work is care work, voluntary work forms part of the broader care economy, and many forms of voluntary participation are care-oriented or community-supporting, including activities that sustain local services, provide social support, strengthen community connection and contribute to collective wellbeing. Recognising these forms of participation within employment services would therefore not only ensure that a nationally consistent service can respond to local circumstances, including local pressures on volunteer and care systems; it would also make visible a broader range of socially valuable contributions, thereby supporting the Government's care- and gender-focused policy initiatives.

Importantly, this policy change would represent a relatively low-cost investment in building community capacity. Voluntary work generates benefits not only for participants but also for the communities and organisations they support. National modelling indicates that volunteering is

associated with a 4.3 per cent increase in wellbeing, a 14 per cent increase in productivity, and an estimated social return of approximately \$5 for every \$1 invested (Volunteering Australia, 2023).

2.2.2 Support place-based participation and community development.

Extending the voluntary work provision to those aged over 55 years would create greater opportunities for participants to contribute through locally embedded initiatives that strengthen communities while supporting participation, social inclusion and community connection (AHURI, 2024; AIHW, 2024).

A powerful example is place-based participation in public and community housing. Activities such as tenant representative bodies, community gardens and kitchens, repair and swap programs, arts and cultural initiatives, and environmental projects enable residents to contribute in ways that reflect local needs and priorities. Research suggests these forms of participation can strengthen skills, social connection and wellbeing, while supporting more responsive services and more inclusive and cohesive neighbourhoods (AHURI, 2024; AIHW, 2024; Volunteering Australia, 2023).

Currently, this form of community participation is seldom recognised as satisfying mutual obligation requirements, creating a policy gap that overlooks its value and limits opportunities to strengthen place-based participation. As a result, programs like tenant participation can remain unsupported and underutilised. Recognising volunteering within mutual obligation settings has the potential to reinforce and sustain these locally driven forms of engagement (Baumann and Wolfinger, 2026).

2.2.3 Support self-determination through participant and community control.

This national policy setting would also enable participants and local communities to define and deliver forms of participation that reflect their cultural contexts, priorities, and needs. For Aboriginal and Torres Strait Islander communities, this approach would support locally-determined and culturally meaningful forms of participation, including through community-controlled organisations. Supporting individuals and approved community organisations to identify and respond to local priorities is consistent with principles of self-determination, place-based service delivery and community-led development. As the Australian Human Rights Commission has argued, a central question for mutual obligation policies is whether they empower Aboriginal and Torres Strait Islander people and communities "to take control of their lives and be self-determining" (Aboriginal and Torres Strait Islander Social Justice Commissioner, 2001, Chapter 2; Coalition of Peaks & Joint Council, 2020).

2.2.4 Building community resilience in the face of structural change.

As technological change, population ageing, climate adaptation and changing patterns of labour force participation reshape the economy, policy frameworks will need to place greater emphasis on strengthening social infrastructure, community resilience and social inclusion (The Treasury, 2023; Australian Government, 2023).

Many of the activities that underpin resilient communities already rely heavily on voluntary participation. This includes food production and distribution, resource sharing and repair, climate adaptation and circular economy initiatives, care and support, environmental stewardship, and a wide range of other community-based activities.

Recognising voluntary participation within employment services would provide a practical mechanism for strengthening this local capacity and community resilience. In particular, extending support for voluntary participation in public and community housing settings could help build more connected, inclusive and resilient communities in areas experiencing heightened economic, technological and environmental disadvantage.

2.2.5 Build on existing local capacity.

Expanding approved voluntary work would be a practical, low-cost national reform that builds on an established policy mechanism. It also utilises existing community organisations and administrative arrangements rather than creating new programs. Participation opportunities could be shaped by local demand and community organisational capacity while maintaining nationally consistent eligibility and approval processes (Services Australia, 2025). Community organisations would continue to determine volunteer suitability, provide supervision where required and manage participation through existing volunteer management processes. Responsibility for monitoring participation and administering mutual obligation requirements would remain with Services Australia and authorised providers, as is currently the case with the over 55s.

This clear separation of responsibilities avoids transferring compliance and enforcement responsibilities to community organisations, supporting participation by smaller organisations with limited administrative capacity (Services Australia, 2026). Concerns regarding organisational capacity are mitigated by the voluntary and demand-driven nature of this policy setting. As is currently the case, organisations are not required to accept volunteers, with participation occurring only where suitable opportunities exist and there is a mutually beneficial match between the participant and host organisation. The change we are recommending would also reduce unnecessary compliance activity for participants already demonstrating a strong capacity for self-directed participation. As with any publicly supported volunteering, policy safeguards have been established to ensure voluntary activities complement rather than displace paid employment (Services Australia, 2025).

2.3 (Question 17): How should employment outcomes and progress towards employment be measured?

Measures of progress should recognise that, where participants maintain an ongoing and mutually beneficial relationship with a voluntary organisation, continued participation itself demonstrates progress towards longer-term participation and employment goals.

2.3.1 Capability development, meaningful participation and community contribution alongside employment outcomes.

Consistent with the objectives of the Employment Services Reform process, progress towards employment should be measured through both employment outcomes and improvements in capability, recognising that pathways towards participation and employment differ according to individual circumstances, support needs and barriers (DEWR, 2026).

For people experiencing long-term disadvantage, voluntary work can provide a meaningful form of participation that builds confidence, wellbeing, social connection and engagement with the community (SEERC, 2019; Volunteering Australia, 2023). While valuable in their own right, these outcomes can also support ongoing attachment to the labour market through strengthened skills, routines and social networks (AIHW, 2025; Fee & Lizier, 2024).

Consistent with this evidence, Recommendation 49 of the *Rebuilding Employment Services* inquiry proposed that success should be measured through improvements in capability, confidence, wellbeing, connectedness and participation, rather than immediate employment outcomes alone (House of Representatives, 2023; Australian Government, 2024a; DEWR, 2026).

2.3.2 For people who show initiative through volunteering, progress can be self-directed.

Given the well-established individual, community and economic benefits of voluntary work, sustained participation should be recognised as a legitimate indicator of progress within employment services (Volunteering Australia, 2023). This principle is already reflected in existing policy settings, which allow many job seekers aged 55 and over to fully meet their mutual obligation requirements through approved voluntary work (Services Australia, 2025).

Extending similar recognition to other participants facing significant barriers would be consistent with the broader reform shift towards capability development, participant choice and meaningful participation. There is no evidence that recognising these forms of participation would reduce incentives to take up suitable paid employment. Rather, the

ongoing commitment required to undertake voluntary work, alongside the substantial financial benefits associated with paid employment, would indicate otherwise.

Even where immediate employment is not achievable, sustained voluntary work remains a meaningful indicator of progress. While evidence suggests that voluntary work functions primarily as a mechanism for developing skills, knowledge and capability, maintaining labour market attachment, and supporting gradual and often non-linear progress towards participation and employment, rather than as a short-term job-matching intervention (SEERC, 2019; AIHW, 2025; Fee & Lizier, 2024), these outcomes are likely to deliver substantially greater value than low-value compliance activities that do little to build capability, improve wellbeing or support long-term participation (House of Representatives, 2023). This participation is also a vast improvement on disengagement, which is associated with skill erosion, weakened social networks and reduced wellbeing (RBA, 2020).

3. Recommendation

Consistent with the reform objective of enabling participants to play an active role in shaping their participation rather than simply responding to externally imposed compliance requirements, this submission makes the following recommendation:

Extend the existing voluntary work pathway available to long-term income support recipients aged 55 and over to all recipients, particularly those experiencing comparable barriers to employment.

All participants would be able to fully satisfy their mutual obligation requirements through approved voluntary work undertaken with an eligible not-for-profit community organisation.

This would involve removing current restrictions that:

- i. require individual assessment and approval of voluntary work arrangements;
- ii. limit the duration of approved voluntary work;
- iii. limit the extent to which voluntary work can satisfy participation requirements on its own, including by requiring it to be combined with other approved activities; and
- iv. require voluntary work to demonstrate a connection to improved employment prospects.

This recommendation is consistent with Recommendation 49 of the *Rebuilding Employment Services* inquiry (House of Representatives, 2023). Subsequent welfare service reforms in 2025 have broadened recognised voluntary participation pathways, including for professional artists and Carer Allowance recipients (Services Australia, 2025), while government reviews and stakeholder submissions have supported expanding voluntary work options for other cohorts (Services Australia, 2025). Minister Rishworth (2026) has also recently identified volunteering as a flexible pathway for those experiencing barriers to employment to build confidence and capability.

Taken together, these developments suggest that extending voluntary work arrangements would be a logical continuation of the current reform agenda. It would better align participation requirements with individual circumstances while strengthening participant choice, recognising meaningful participation and capability development, and maintaining expectations of active engagement.

4. Signatories

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Caring Futures is a Strategic Research Collaboration recently established at Western Sydney University to bring together researchers from across disciplines, including health, education, design, gender and ageing, housing, geography, urban planning, sociology, family studies and social policy, to advance research and advocacy on care practices, infrastructures and ethics and the conditions that sustain caregiving across the life course.

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