



OUT19/4394

Tracey Horsfall
Mental Health Inquiry
Productivity Commission
GPO Box 1428, Canberra City, ACT 2601

Dear Tracey,

Productivity Commission Issues Paper: The Social and Economic Benefits of Improving Mental Health

The NSW Small Business Commissioner (NSWSBC) is focused on supporting and improving the operating environment for small businesses throughout NSW. The NSWSBC advocates on behalf of small businesses, provides mediation and dispute resolution services, speaks up for small businesses in government and makes it easier to do business through policy harmonisation and regulatory reform.

Small businesses are vital contributors to the NSW economy. Latest figures show that the 765,000 small businesses in NSW make up almost 98 per cent of all businesses in the state, employ almost 1.6 million private sector employees and generate about \$51.42 billion in annual wages and salaries. It is also a fast growing sector, with a net growth of 30,000 small businesses during the latest financial year – up from 26,000 in 2016-17.

However, over half a million workers in the state have poor mental health.¹ Small business owners and employees are also at high risk: research shows that many small business owners and their employees experience alarming levels of stress, depression and anxiety.² Nationally, around 12 per cent of small-to-medium enterprise (SME) owners have been diagnosed with depression, stress or anxiety due to the strains of running a small business and more than one in 10 of these SME owners regretted starting their own business due to the emotional pressure.³

Such trends not only affect the short and long-term health and wellbeing of a significant proportion of the state's population, it also negatively impacts the economy due to the loss of productivity from both presenteeism and absenteeism. Furthermore, few workplace mental health interventions target small businesses specifically, even though the sector has unique and diverse needs for such interventions. We have also witnessed first-hand the devastating effects of natural disasters on the mental health and wellbeing of small businesses.

¹ NSW Mentally Healthy Workplaces Strategy, p 5.

² icare and Everymind, *White Paper: Can digital interventions help to improve mental health and reduce mental ill-health in small business?* (2017) p 7.

³ Bank of Queensland, *The darker side of small business: How SMEs can protect their emotional wellbeing* (2017), p 4.

The NSW SBC believes that the small business workplace is a setting where mentally healthy practices can flourish and where more targeted research and investment in this area will result in healthier, more productive communities. Figures on the return on investment of implementing mental health actions in small business are high: an estimated \$14.50 for every \$1.00 spent.⁴ Given this, we believe that there is much work that could be done to improve mental health in the small business sector.

We are pleased to provide the following comments and recommendations for the inquiry's consideration. Our submission focusses on the unique barriers small businesses face in becoming mentally healthy workplaces and proposes an integrated, industry-specific approach to addressing mental health in the sector.

We thank you for the opportunity to provide a submission to this inquiry. Our recommendations, and detailed comments supporting the recommendations, follow.

Recommendation 1: The Inquiry should focus on evidence-based, integrated workplace interventions specific to the small business sector that can be evaluated for effectiveness.

Recommendation 2: The Inquiry should consider early stage mental health screening measures to identify small business work environment and individual-level stressors to prevent against the risk of later onset mental illness.

Recommendation 3: The Inquiry should consider implementing basic, practical, customisable financial literacy and management programs and resources for small business owners for free or at a low cost. This would equip owners with the necessary skills to run the daily operations of the business and reduce sources of stress.

Recommendation 4: The Inquiry should evaluate current online mental health resources targeting small business for effectiveness and consider the development of a long-term strategy for online mental health resource delivery to small business.

Recommendation 5: Organisations offering workplace mental health services and resources should offer them in different languages for better accessibility for small businesses from culturally and linguistically diverse backgrounds.

Recommendation 6: The Inquiry should consider evaluating the effectiveness of current resources that aim to educate close family members of small business owners to facilitate evidence-based expansion of these resources.

Recommendation 7: The Inquiry should consider appropriate models to deliver free professional financial advice to small business owners in distress as there are no free providers of this professional service.

Recommendation 8: The Inquiry should consider opportunities for free or low-cost mental health treatment services to be available for small businesses to

⁴ PwC, *Creating a mentally healthy workplace: Return on investment analysis* (2014).

access, as small businesses are less likely to be able to afford formal Employee Assistance Programs.

Recommendation 9: The Inquiry should consider conducting a project through a government behavioural insights unit to apply behavioural insights to influence small businesses to invest more into workplace mental health interventions.

Recommendation 10: The Inquiry should consider conducting further research into small business employee risk factors using a Job Exposure Matrix method. Identification of different occupational mental health risk factors between small business employees and owner-operators would inform future workplace mental health interventions targeting small business employees.

Recommendation 11: The Inquiry should consider the establishment of industry-specific peer networks focusing on mental health promotion and awareness.

1. Small business not a focus of current mental health interventions

The majority of evidence-based workplace mental health interventions are designed to be used in large organisations. There are considerably fewer mental health interventions targeting small businesses specifically, although encouragingly it seems to be an emerging area of research and implementation.⁵

The NSWBC believes that it is important to implement evidence-based workplace mental health interventions that target small businesses. This is because typically small businesses have specific needs and barriers which mean that many workplace mental health programs designed for larger organisations would not be as effective, or even appropriate. For example:

- Small businesses are comparatively time and resource poor.⁶ While larger businesses have specialised teams to manage finance, work health and safety procedures, human resourcing, information technology and marketing, small businesses must manage all these functions across only a few people in addition to other work involved in running the business. This often means many small business owners work long hours because they take on many responsibilities in relation to the business, often resulting in a blurred line between work and home life.
- Small business owners often operate under a high level of financial pressure. This is commonly due to a combination of stressors such as unpredictable income, cash flow issues and delayed payments.
- The majority of small business owners in NSW are sole operators and almost 30 per cent have fewer than four employees.⁷ These business owners have limited professional support networks and often work in isolation. As such,

⁵ See, for example, icare and Everymind, *White Paper: Can digital interventions help to improve mental health and reduce mental ill-health in small business?* (2017).

⁶ icare and Everymind, *White Paper: Can digital interventions help to improve mental health and reduce mental ill-health in small business?* (2017) p 18.

⁷ icare and Everymind, *White Paper: Can digital interventions help to improve mental health and reduce mental ill-health in small business?* (2017) p 60.

many are unlikely to seek help if they have concerns about their mental health.⁸ This is particularly so for the growing home business sector in NSW.⁹

- The small business sector in NSW spans many industries and owner/employee backgrounds.¹⁰ This suggests that broad-ranging workplace mental health interventions, for example Employee Assistance Programs, may not be sufficiently adapted for many small businesses, resulting in low uptake.

2. A government priority

The *NSW Mentally Healthy Workplaces Strategy 2018-2022* is the NSW Government's first comprehensive approach for workplace mental health. It is funded for \$55 million over four years and sets out a long-term vision to create mentally healthy workplaces in NSW. The NSW SBC contributed to this Strategy, and is also engaged in the Federal Government's initiatives in this space, including attending the roundtable discussions on mental health for small business operators held by the Minister for Small Business, Michaelia Cash.

The NSW SBC is also committed to supporting more small businesses in NSW to become mentally healthy workplaces. In recognition of the financial pressures and regulatory burdens placed on small businesses, the NSW SBC undertakes a variety of projects that aim to assist small businesses in dispute and make it easier to start and grow a small business in NSW. Some initiatives include:

- Developing a Payment Terms Policy which ensures that small businesses that supply from \$10,000 up to \$1 million worth of goods or services to the NSW Government will be paid within 20 business days, which will be reduced to five business days by the end of 2019.
- Developing policies under the *Easy to do Business* program, which slashed the time and complexity of starting a café, restaurant or small bar in NSW.
- Offering a mediation service to help in resolving small business and retail lease disputes.

We are finalising a suite of workplace mental health resources it has developed for small business, which will be launched in the coming months. These resources include a range of online and print collateral to inform small business owners of the available help, as well as a contingency tool to help them prepare their business in the event they suffer a mental health issue.

We will continue to work with small businesses, other government departments and industry stakeholders to develop effective interventions and strategies to improve mental health in the small business sector.

3. Integrated workplace interventions maximise benefits for small business

⁸ Bank of Queensland, *The darker side of small business: How SMEs can protect their emotional wellbeing* (2017), p 4.

⁹ OSBC Home Business survey: Key findings

¹⁰ icare and Everymind, *White Paper: Can digital interventions help to improve mental health and reduce mental ill-health in small business?* (2017) p 7.

There are various types of workplace interventions for mental health which can be used at different stages. An integrated approach to mental health interventions which incorporates strategies targeting all stages of mental health and ill-health would realise the greatest benefits to small businesses. However, statistics from Safework NSW's *Mentally Health Workplaces in NSW – Benchmarking tool* found that only 8.8 per cent of businesses in NSW have integrated approaches to addressing workplace mental health. This percentage is likely even lower for small businesses, as the Benchmarking tool excluded micro-businesses from its analysis.

Recommendation 1: The Inquiry should focus on evidence-based, integrated workplace interventions specific to the small business sector that can be evaluated for effectiveness.

One of the most important ways to improve the mental health and workplace productivity of all workers is to limit and help workers manage job stress. Each type of intervention aims to reduce job stress at different stages of a worker's mental health and ill-health. To ensure that small business owners and employees can access support at any stage of mental ill-health, it is important for interventions to be available at every stage.

An integrated approach to mental health means that small businesses have access to resources and support at every stage of the mental health and ill-health spectrum, from before the onset of illness (primary-level interventions), to responding to job stressors (secondary-level interventions), to recovery from a mental illness (tertiary-level intervention).

The different stages of interventions, and an assessment of current practices and areas for development and exploration for each, are described below.¹¹

A. Primary interventions

The primary stage of workplace mental health interventions aim to:

- Change work environment risk factors to reduce the incidence of job stressors at the source, and/or
- Reduce risk factors of individuals, for example developing skills in financial management or reducing drug and alcohol misuse.

The sources of work environment risk factors for small business are difficult to fully untangle given the nature of running a small business. Many people enter and continue in small business to 'be their own boss' and to use their special skills to achieve personal and economic growth and development.¹² The ability of small businesses to be able to choose their working hours however has mixed outcomes: while many small businesses see flexible working hours as a 'reward' for being self-

¹¹ Derived from icare and Everymind, *White Paper: Can digital interventions help to improve mental health and reduce mental ill-health in small business?* (2017) p 17; Anthony LaMontagne et al., *Workplace mental health: developing an integrated intervention approach* (2014).

¹² Helen Samujh, *Micro-businesses need support: survival precedes sustainability* (2011) p 20.

employed,¹³ a more recent study suggests that such flexibility comes at the expense of the health, personal wealth and wellbeing of small business owners.¹⁴

There is evidence that a proportion of small business owners underestimate the day-to-day financial management skills required to run a business, and struggle as a result due to inexperience and lack of knowledge in this area.¹⁵ A New Zealand study found that the majority of small business owners interviewed do not have formal qualifications in business-related subjects and placed customer relations, time management, priority setting and planning family and leisure time as important business skills *before* the traditional sorts of business skills such as regulations, business planning and bookkeeping.¹⁶ The risk of this approach spiralling towards poor wellbeing outcomes for business owners was encapsulated in the following quote:

[Small business owners] Being unprepared and lacking information could lead to a lack of confidence, caused by uncertainty about how to behave. The lack of confidence could lead to a sense of having too much to do, which in turn could lead to a sense of being overwhelmed. Being overwhelmed causes stress and the operator becomes susceptible to depression, which would further reduce confidence. Without appropriate help the cycle could become a downward spiral in business and personal failure. An operator without adequate preparation may have insufficient emotional resources to maintain a sustainable business idea regardless of its economic potential and viability.' – Helen Samujh, *Micro-businesses need support: survival precedes sustainability* (2011)

Primary stage mental health interventions target small businesses at an early stage, before the onset of mental ill-health. For small businesses this would be mainly during the initial set up and preparation period. While many small business owners go into business to 'be their own boss', many underestimate the financial literacy and management skills needed to operate the business.¹⁷ Therefore, it is important that these interventions ensure that as far as possible, small businesses can have opportunities to equip themselves with skills relating to running a business as early as possible before, during or after the set-up of the business.

Currently, TAFE NSW runs a qualification course titled 'Statement of Attainment in Small Business Financial Awareness', which runs for 12 weeks at a cost of over \$1,440. For many small businesses, this may be seen as a time and cost burden, particularly if they do not require assistance for all units of the course or require information about other aspects of financial management that are not covered in the topics.

There has been being undertaken to improve the financial literacy of consumers and individuals under ASIC's National Financial Literacy Strategy 2014-17. The strategy recognises that improving the financial literacy of Australians is a large, multi-

¹³ Helen Samujh, *Micro-businesses need support: survival precedes sustainability* (2011) p 20.

¹⁴ Suncorp,

¹⁵ Bank of Queensland, *The darker side of small business: How SMEs can protect their emotional wellbeing* (2017), p 5.

¹⁶ Helen Samujh, *Micro-businesses need support: survival precedes sustainability* (2011) p 19.

¹⁷ Elizabeth Walker et al., *Small business owners: too busy to train?* (2007).

generational task. However, there is potential to expand easily accessible financial literacy training to new businesses, in particular small businesses. This could then be developed further into basic financial management training for small business operators.

Recommendation 2: The Inquiry should consider early stage mental health screening measures to identify small business work environment and individual-level stressors to prevent against the risk of later onset mental illness.

Recommendation 3: The Inquiry should consider implementing basic, practical, customisable financial literacy and management programs and resources for small business owners for free or at a low cost. This would equip owners with the necessary skills to run the daily operations of the business and reduce sources of stress.

B. Secondary interventions

Secondary workplace mental health interventions aim to change how small business owners and staff respond to job stressors, including strategies to improve an individual's ability to cope with these stressors.

There are a range of resources and training available to small businesses that fall under this category of intervention. For example, researchers from Everymind have launched a trial, consisting of an online platform and app, targeting the mental health needs of small business owners and sole traders. Researchers from the University of Tasmania, Griffith University and the Menzies Research Institute Tasmania have also developed a DVD series targeting mental health promotion in small-medium enterprise owner/managers. Safework NSW has partnered with Black Dog Institute to provide free mental health training for 3,600 managers across NSW, a portion of which will be small business owners.

i. Online delivery

Recognising the barriers that small business owners face in accessing help to cope with work-related stressors, the aforementioned programs attempt to introduce an online delivery medium. Everymind conducted a survey of small businesses and found that if people were concerned about their mental health, the first place they would go is online.¹⁸ These small businesses expressed preference for online support in the first instance as it is easily accessible and anonymous.¹⁹

The NSW SBC supports these online interventions as they can be adapted to the needs of small businesses that may face a number of practical barriers in accessing support such as financial resources and geographical location. However, further research is required to determine the level of uptake of these online resources and their effectiveness for small businesses.

¹⁸ icare and Everymind, *White Paper: Can digital interventions help to improve mental health and reduce mental ill-health in small business?* (2017) p 44.

¹⁹ icare and Everymind, *White Paper: Can digital interventions help to improve mental health and reduce mental ill-health in small business?* (2017) p 45.

Recommendation 4: The Inquiry should evaluate current online mental health resources targeting small business for effectiveness and consider the development of a long-term strategy for online mental health resource delivery to small business.

The NSW SBC also notes that nationally, approximately two-thirds of small business owner managers were not born in Australia.²⁰ Currently the majority of mental health resources for individuals and small businesses are only available in English. This may result in cultural and linguistic barriers to these small businesses accessing workplace mental health resources and seeking help. For workplace mental health interventions to be accessible for as many small business staff as possible, they should be available in different languages.

Recommendation 5: Organisations offering workplace mental health services and resources should offer them in different languages for better accessibility for small businesses from culturally and linguistically diverse backgrounds.

ii. *Support and professional advice*

One of the challenges of working in small business is having relatively limited networks compared to working in larger organisations. Data from small businesses were revealing on this front: most respondents indicated that additional support was only sometimes or seldom available.²¹ This relative isolation contributes to the majority of business owners reluctant to seek help if they are concerned about their mental health. If owners are prepared to seek help, research suggests that the majority would speak to a family member, an accountant or banking advisor over a psychologist or counsellor.²²

While family members are often the first place a small business owner looks for support, mental health interventions focusing on building family members' capability and resilience is an emerging area. Everymind's *Ahead for Business*, a digital platform supporting small business owners and the people that support them, launched in October 2018. It is promising to see that the platform has resources to help people with supporting small business owners. Further evaluation is required to ascertain their effectiveness and facilitate evidence-based growth and expansion of these programs.

Recommendation 6: The Inquiry should consider evaluating the effectiveness of current resources that aim to educate close family members of small business owners to facilitate evidence-based expansion of these resources.

Currently there is no provider of free professional legal or financial advice for small businesses. Consultation with the Consumer Action Law Centre, Financial Rights Legal Centre and Redfern Legal Centre identified that while they have all been

²⁰ ABS data.

²¹ icare and Everymind, *White Paper: Can digital interventions help to improve mental health and reduce mental ill-health in small business?* (2017) p 38.

²² Bank of Queensland, *The darker side of small business: How SMEs can protect their emotional wellbeing* (2017), p 4.

contacted by small businesses in distress, none of these organisations are funded to assist small businesses, meaning they could only provide limited guidance.

The ASBFEO and the NSW SBC both provide mediation and dispute resolution services to small businesses. The NSW Department of Industry also has a Business Connect program which provides one-to-one business advice to small businesses, the first four hours of which are free. However, these services do not offer professional financial advice to businesses, unlike services by non-government organisations such as Business Debtline for businesses in the United Kingdom or by the consumer-focused Financial Rights Legal Centre and the Consumer Action Law Centre in Australia.

Recommendation 7: The Inquiry should consider appropriate models to deliver free professional financial advice to small business owners in distress as there are no free providers of this professional service.

C. Tertiary interventions

Tertiary workplace mental health interventions are in place to respond to the occurrence of mental health issues by supporting recovery from illness and return to work. The *Mentally Healthy Workplaces in NSW – Benchmarking tool* by SafeWork NSW found that approximately 30 per cent of businesses studied were classified as taking ‘Limited action’ on mental health, meaning that any action taken have been triggered by a mental health incident that has gotten their attention.

Given that small businesses are far less likely than larger organisations to have formal Employee Assistance Programs,²³ where access to effective treatments may be brokered, it is important that free or low-cost mental health treatment services are available to small business owners and employees.

Recommendation 8: The Inquiry should consider opportunities for free or low-cost mental health treatment services to be available for small businesses to access, as small businesses are less likely to be able to afford formal Employee Assistance Programs.

4. Mental health promotion

Another aspect of an integrated workplace mental health intervention approach is to actively promote mental health awareness and practices across the small business sector. This is an important aspect of mental health intervention implementation, as the effectiveness of any evidence-based intervention is limited if it does not reach or is not accessible to its target audience.

Unfortunately, it appears that stigma, or the perception of stigma around mental health continues to exist in the small business sector. For example, Everymind’s data found that respondents who scored higher on the Depression Anxiety Stress Scales were more accepting of others who have been diagnosed with a mental

²³ icare and Everymind, *White Paper: Can digital interventions help to improve mental health and reduce mental ill-health in small business?* (2017) p 61.

illness, but may also be less likely to disclose their own mental ill-health to others for fear of being treated poorly.²⁴

For small businesses, the health and wellbeing of the business is often intricately linked to the health and wellbeing of the owners and staff. Indeed, mental ill-health can lead to significant costs in presenteeism and absenteeism for small businesses in NSW. Conversely, increased investment in mental health can result in high returns for the business, with conservative estimates of \$14.50 return for every \$1.00 invested in implementing a single action on mental health.²⁵ The OSBC suggests that promotional materials for small business focusing on the return on investment on mental health initiatives are likely to result in a higher uptake.

Mental health promotion could benefit from applying behavioural insights to draw on research from behavioural economics, psychology and neuroscience to understand how small business owners and employees behave and make decisions.²⁶ Behavioural insights have been shown to be effective in influencing the change of behaviours of groups of people, such as workers in a particular industry sector.²⁷

Recommendation 9: The Inquiry should consider conducting a project through a government behavioural insights unit to apply behavioural insights to influence small businesses to invest more into workplace mental health interventions.

5. Support for small business employees

The OSBC also notes that many of the secondary workplace mental health interventions are targeted towards small business owners. As previously discussed, small business owners are often time poor and under particularly high financial pressures. As a result, that effect of these pressures and resulting risk of mental illness could flow onto small business employees.

In relation to identifying occupational-specific risk factors for workplace mental ill-health, academics have identified that using subjective self-reporting without validated risk thresholds could substantially widen the range of what is considered a 'risk factor'.²⁸ For example, some jobs may tolerate increased working hours more than other organisations, so what is considered a high risk in one group may be considered low level risk in another.

A Job Exposure Matrix research tool was a novel approach developed in Australia to assign exposures to risk factors on the basis of job title.²⁹ This approach can be used to estimate workplace mental ill-health risk factors for each job title so may be used to identify risk factors affecting small business employees as distinct from their employers. This matrix has shown to be an effective evaluation method for these

²⁴ icare and Everymind, *White Paper: Can digital interventions help to improve mental health and reduce mental ill-health in small business?* (2017) p 56.

²⁵ PwC, *Creating a mentally healthy workplace: Return on investment analysis* (2014).

²⁶ Behavioural Insights Team, *EAST: Four simple ways to apply behavioural insights* (2014).

²⁷ NSW Department of Premier and Cabinet, Behavioural Insights Unit.

²⁸ *NSW Mentally Healthy Workplaces Strategy 2018-2022*.

²⁹ Alison Milner et al., *Validity of a Job-Exposure Matrix for Psychosocial Job Stressors: Results from the Household Income and Labour Dynamics in Australia Survey* (2016).

purposes, and can also be used to determine occupational risk differences between small business industry sectors. Further research using a Job Exposure Matrix tool could facilitate understanding of small business employee risk factors, which would inform further targeted workplace mental health interventions.

Recommendation 10: The Inquiry should consider conducting further research into small business employee risk factors using a Job Exposure Matrix method. Identification of different occupational mental health risk factors between small business employees and owner-operators would inform future workplace mental health interventions targeting small business employees.

6. Industry-specific interventions

There is ample evidence in the literature suggesting that productivity loss due to mental ill-health varies across industries and that SMEs across different industries may offer significantly different types of support to employees.³⁰ The *Mentally Healthy Workplaces in NSW – Benchmarking Tool*,³¹ used to inform the *NSW Mentally Healthy Workplaces Strategy 2018-2022*, found that some industries are at higher risk of poor mental health outcomes due to having a higher prevalence of mental ill-health and a lower capability to create mentally healthy workplaces.³²

The industry sectors performing below the average were:

- Professional, scientific and technical services,
- Information media and telecommunications,
- Public administration and safety,
- Transport, postal and warehousing,
- Manufacturing,
- Construction,
- Rental, hiring and real estate services (property).

Given the variation in mental health approaches and outcomes across industries, industry-specific workplace mental health interventions are important to consider adapting for a small business context. We note that programs evaluated as effective are already in place in construction, mining, and farming.³³

Recommendation 11: The Inquiry should consider the establishment of industry-specific peer networks focusing on mental health promotion and awareness.

7. Mental health impact of natural disasters

The NSW SBC has seen first-hand the devastating effects of floods, bushfires and other natural disasters on small businesses and the mental health of small business owners, staff and their families. Unfortunately, small businesses are often confronted with a protracted battle to secure payments from their insurance companies once

³⁰ Stacey Jenkins et al., *A Framework for Optimising Work-Life Balance Practices in Australia: Perceived Options for Employee Support* (2016).

³¹ Prepared by Instinct and Reason for SafeWork NSW, October 2017.

³² *NSW Mentally Healthy Workplaces Strategy 2018-2022* p 5-6.

³³ For example Mates in Construction, Mates in Mining, the Ripple Effect.

they have issued a claim. We have observed that insurers will employ any and all methods to delay or refuse payment.

In the event their claim is denied, small businesses have the option of appealing this decision. The ensuing process of review involves an internal dispute resolution procedure, followed by an external dispute resolution procedure (in the event the dispute is still not resolved). This process is complicated and legalistic, and takes an unreasonably long time to reach conclusion, particularly given many small businesses so desperately need cash flow to recover from a disaster. For example, businesses impacted by the flooding caused by Cyclone Debbie were still waiting for the final outcome of their disputes over a year after initially lodging their claim.

For many small businesses, in the absence of receiving these expected payments promptly, closing the doors is the only option. The NSW SBC would encourage increased focus on how small businesses can be better assisted in the event of a natural disaster.

8. Concluding remarks

Mental ill-health is costly for individuals, local communities and society in every respect. Recent research has uncovered an alarming trend of a large and increasing number of small businesses in NSW suffering from mental health issues. This has a large cost on the economy from loss of productivity in the forms of both presenteeism and absenteeism.

The NSW SBC believes that inaction on this matter is not an option: mental health is everybody's responsibility and targeted, integrated and evidence-based interventions for small business are as necessary now as ever. We also believe that as important as it is to develop these interventions, they must also be readily accessible to small businesses, which often face a host of unique barriers in accessing support and treatment.

We welcome the Productivity Commission to consider our comments and recommendations as this inquiry into mental health continues. To discuss this submission further, please contact Helen Wang, Advisor, Advocacy and Strategic Projects

Yours sincerely

Robyn Hobbs OAM
NSW Small Business Commissioner
12 April 2019