



Equality Rights Alliance

Women's Voices for Gender Equality



**Submission of the Equality Rights Alliance to the
inquiry of the Senate Community Affairs Legislation
Committee into into the *Social Security
(Administration) Amendment (Income Management to
Cashless Debit Card Transition) Bill 2019***

18 October 2019

Equality Rights Alliance

Equality Rights Alliance (ERA) is Australia's largest network advocating for women's equality, women's leadership and recognition of women's diversity. We bring together 64 non-government organisations and social enterprises with a focus on the impact of policy or service delivery on women.

ERA believes the advancement of women and the achievement of equality are matters of fundamental human rights and advocates for gender equality, women's leadership and government policy responses that support women's diversity.

We are one of the six National Women's Alliances, funded by the Commonwealth Office for Women.

Summary of recommendations

- 1. Apply an intersectional gender lens in reviewing social security policy and legislation, including to the assessment of the Bill's compatibility with human rights.**
- 2. Investigate and consult on models of Gender Responsive Budgeting for integration into the budget process, including design of and changes to the social security system.**
- 3. Increase the rate of social security payments, including Newstart Allowance and Youth Allowance, and index payments to wages as well as CPI increases, to ensure they maintain parity with community living standards.**
- 4. Increase investment in crisis and public and social housing to respond to the needs of women leaving violence, in line with priorities under the Fourth Action Plan.**
- 5. Redesign the Cashless Debit Card (CDC) program as opt-in only.**

This submission is endorsed in whole or in part by the members of the Equality Rights Alliance:

- 2020Women
- Aboriginal Legal Rights Movement
- Alevi Federation of Australia
- Australasian Council of Women and Policing
- Australian Baha'i Community – Office of Equality
- Australian Centre for Leadership for Women
- Australian Federation of Graduate Women
- Australian Federation of Medical Women
- Australian Motherhood Initiative for Research and Community Involvement
- Australian National Committee for UN Women
- Australian Women's Health Network
- CARE Australia
- Children by Choice
- COTA Australia
- FECCA Women's Committee
- Feminist Legal Clinic
- Fitted for Work
- Gender Equity Community of Practice
- Girl Guides Australia
- Good Shepherd Australia New Zealand
- Homebirth Australia
- Human Rights Law Centre
- Immigrant Women's Speakout Association NSW
- International Women's Development Agency
- JERA International
- Jessie Street National Women's Library
- Justice Connect
- Maternity Choices Australia
- Migrant Women's Lobby Group of South Australia
- Multicultural Women's Advocacy ACT
- National Association of Services Against Sexual Violence
- National Council of Churches of Australia Gender Commission
- National Council of Jewish Women of Australia
- National Council of Single Mothers and Their Children
- National Council of Women of Australia
- National Foundation for Australian Women
- NSW Council of Social Services
- National Union of Students (Women's Department)
- Older Women's Network NSW Inc
- Project Respect
- Public Health Association of Australia (Women's Special Interest Group)
- Reproductive Choice Australia
- Safe Motherhood For All Inc
- Sexual Health and Family Planning Australia
- Soroptimist International
- Sisters Inside
- Union of Australian Women
- United Nations Association of Australia Status of Women Network
- Victorian Immigrant and Refugee Women's Coalition
- VIEW Clubs of Australia
- Women in Adult and Vocational Education
- Women in Engineering Australia
- Women on Boards
- Women with Disabilities Australia
- Women's Equity Think Tank
- Women's Electoral Lobby
- Women's Environment Network Australia
- Women's Housing Ltd
- Women's Information Referral Exchange
- Women's International League for Peace and Freedom
- Women's Legal Services Australia
- Women's Property Initiatives
- Women Sport Australia
- Working Against Sexual Harassment
- YWCA Australia
- Zonta International Districts 22, 23 and 24

Introduction

Equality Rights Alliance thanks the Senate Community Affairs Legislation Committee for the opportunity to make a submission to the inquiry into the *Social Services (Administration) Amendment (Income Management to Cashless Debit Card Transition) Bill 2019*. ERA is strongly opposed to welfare conditionality, and opposes the expansion of the Cashless Debit Card (CDC) Trial through the compulsory transitioning on people on Income Management to the CDC. ERA supports the CDC as an opt-in program only.

We are concerned that the program discriminates against women and Aboriginal and Torres Strait Islander people, with disparate impacts on these groups. We note that the expansion of the CDC program ignores clear evidence that the program is harmful to participants without any evidence of significant benefits for participants. We further note the repeated critiques of the program evaluation quoted by the Government on the benefits of the program, and on which the justification of this legislation is based.

In this submission we respond specifically to the Bill's Compatibility Statement on Human Rights. We endeavor to show that the misinterpretation of Australia's human rights agreement hides the inconsistency of the legislation with international instruments to which Australia is a signatory, including the International Covenant of Economic, Social and Cultural Rights (ICESCR) and the Convention on the Elimination of all forms of Discrimination Against Women (CEDAW) and subsequent commitments made through the Commission on the Status of Women. We argue that this misinterpretation leads to discrimination against women on the basis of gender, as well as racial discrimination Aboriginal and Torres Strait Islander people, with compounding discrimination and impacts for Aboriginal and Torres Strait Islander women.

In its current form, the Cashless Debit Card program is a retrogressive measure in relation to the right to social security, with the "effect of reducing existing levels of social security benefits".¹ We note that there regressions under the ICESCR are prohibited, and as acknowledged by the Attorney General's Department,

*[i]f any deliberately retrogressive measures are taken, the country has the burden of proving that they have been introduced after the most careful consideration of all alternatives and that they are justified, in the context of the full use of the maximum resources of the country.*²

The rights to equality and non-discrimination

Income management and the CDC program discriminate against women and Aboriginal and Torres Strait Islander people. At 30 November 2018, women make up 58.2 % of people on income management generally, and 58.3% in the Northern Territory.³ The majority of people on income management programs are long-term recipients of welfare, and gendered-disaggregated data shows that women are more likely to be on income support payments such as Newstart for longer periods than men. This indicates that income

¹ Attorney-General's Department, (2019). 'Right to social security', retrieved from: <https://www.ag.gov.au/RightsAndProtections/HumanRights/Human-rights-scrutiny/PublicSectorGuidanceSheets/Pages/Rightsocialsecurity.aspx>, accessed 4 October 2019.

² Attorney-General's Department, (2019)., Ibid.

³ Department of Social Services (DSS). (2018). 'Income Management data – (30 November 2018)', *Income Management Summary by Measure inc BasicsCard*, retrieved from: <https://data.gov.au/data/dataset/income-management-summary-by-measure-inc-basicscard>, accessed 4 October 2019.

management programs are more likely to impact on women by design. Further, 78.4% of people on income management are Aboriginal and Torres Strait Islander people.⁴

In the Bill's Compatibility Statement on Human Rights, the argument is made that,

The rights to equality and non-discrimination are not directly limited by the Cashless Debit Card. The program is not applied on the basis of face or cultural factors. Locations for the program have been chosen based on objective criteria. This includes high levels of welfare dependence and community harm, as well as the outcomes of comprehensive community consultation.

The human rights compatibility of the legislation rests on the argument that there is no discriminatory intent in its design. This argument is inconsistent with the Australian construction of indirect discrimination in federal legislation such as the *Racial Discrimination Act 1975* and the *Sex Discrimination Act 1984*, which stipulate that discrimination may occur where an apparently neutral condition or rule has a disproportionate effect on a particular group. While the conditions for entry to the program may not specifically target particular groups, the existing data demonstrates that income management disproportionately impacts on women and Aboriginal and Torres Strait Islander people. According to the Special Rapporteur on Extreme Poverty and Human Rights, Philip Alston, a disproportionate or disparate impact is sufficient to constitute discrimination, even without an explicit discriminatory intent. As Alston stated in his communication to the Australian Government regarding the Social Services Legislation Amendment Act 2017,

Under human rights law, a discriminatory intent is not a necessary element of discrimination... Any measure with the effect of nullifying or impairing the equal enjoyment of human rights constitutes a violation of States' human rights obligations, regardless of the intention. Thus, despite the formal neutrality of a law, a disproportionate impact on women [or Aboriginal and Torres Strait Islander people] could be contrary to Australia's obligation under the ICESCR... The discrimination through different impact on the basis of sex... [or Aboriginal and Torres Strait Islander status]... is patent. Pursuant to international human rights law, there is no justification for discrimination. Even if something is said to be "reasonable and proportionate," it may in fact be unreasonable as a result of its very disparate impact.⁵

The over-representation of both women and Aboriginal and Torres Strait Islander people among people on income management, means their inclusion in and transfer to the CDC trial is discriminatory by nature of its disparate impact on particular groups of people. In our view, the Bill's Compatibility Statement on Human Rights is manifestly inadequate in that it fails to consider the effects of indirect discrimination on rights to equality and non-discrimination.

An intersectional gender lens on social security and income management

In order to avoid discriminatory policy, poverty and the provision of social protections in Australia must be considered through an intersectional gender lens. Applying a gender lens involves an analysis which considers how the impacts of a law, policy or intervention creates different outcomes for people which are dependent on their gender, including the different outcomes for men and women.

⁴ Department of Social Services (DSS). (2018). 'Income Management data – (30 November 2018)', *Income Management Summary by Measure inc BasicsCard*, retrieved from: <https://data.gov.au/data/dataset/income-management-summary-by-measure-inc-basicscard>, accessed 4 October 2019.

⁵ Office of the High Commission for Human Rights – Mandates of the Special Rapporteur on extreme poverty and human rights, *Communication to Australia* 17 October 2017, OL/AUS/5/2017, available from: <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gld=23386>, accessed 23 September 2019.

Intersectionality refers to the way in which social norms such as racism, laws, policies and interventions act together and over time to compound the impacts of inequality on particular groups of people, for example on women who are Aboriginal, have a disability, or are from low-socioeconomic backgrounds. An intersectional gender lens is a tool for analyzing how social norms, policies and interventions act alongside gender inequality to create more severe impacts on particular groups of women and people. It requires looking at a particular intervention systemically alongside other policies and other systems of disadvantage to help us to understand the disparate impacts of a policy on particular groups of women and people. An intersectional gender lens begins with considering how poverty is experienced disparately in Australia.

The social protection system in Australia is gender-blind. It is not appropriately structured to account for gender discrimination, gendered roles or the unequal division of caring and other unpaid labour, and creates disadvantage as a result. An important way in which the system is gender blind is in failing to account for the over-representation of women in unpaid work and care.⁶ Women's employment rate is 64% in comparison with 75% for men, and women aged 30-34 years old are three times more likely than men to be out of the labour force⁷ as a result of over-representation in unpaid work and care. Unpaid work keeps women out of fulltime and leadership roles, and the wage gap and industry segregation keep women in lower paid jobs. Women make up the majority of income support recipients and are more likely to be in receipt of payments for longer periods. This reflects a broader trend of women in Australia experiencing poverty for longer periods than men.⁸ Importantly, women also make up 66% of part-rate recipients of Newstart payments, which indicates that those payments are a crucial supplement to the low income, part-time and casual work in which women are over-represented.⁹ As we have noted, women also make up the majority of people on income management, which is targeted at long-term welfare recipients in which women are over-represented.

Some women and people are exposed to more severe and specific poverties, as a result of the way interventions, policies and social norms compound. We note that Aboriginal people are also over-represented among people on income management. Further, Aboriginal and Torres Strait Islander women are paid an annual average of \$11, 200 less than non-Indigenous women¹⁰ and experience severely high rates of domestic and family violence.¹¹ These factors increase Aboriginal and Torres Strait Islander women's vulnerability to harmful outcomes as a result of Cashless Debit Card program, including poverty and a decreased ability to leave domestic and family violence as a result of restricted income.¹² In other words, these factors compound to leave Aboriginal and Torres Strait Islander women facing greater discrimination from the Bill, in terms of both over-representation in, and severity of disadvantage resulting from, its impacts. This is despite the fact that Aboriginal and Torres Strait Islander women's employment rates are better than men's.¹³

⁶ Another way in which the system is gender blind is for not accounting for how transphobia and the high rates of health burdens for non-binary transgender people limit access to long-term employment and perpetuate financial security, and by not structuring payments and support accordingly. There is little data or evidence to indicate how people who are transgender have experienced the Centrelink compliance program. As a result, in this submission we focus on disparate impacts which are a result of gendered care work.

⁷ ABS 6224.0.55.001 Labour Force, Australia: Labour Force Status and Other Characteristics of Families, June 2016.

⁸ Australian Government, "Indicator 1.2.1 Proportion of population living below the national poverty line, by sex and age" *Sustainable Development Goals Data*. 17 July 2018, <https://www.sdgdata.gov.au/goals/no-poverty/1.2.1> (accessed 24/10/18)

⁹ 2018 data on Newstart commissioned from Department of Social Services by ERA.

¹⁰ Howlett, M, M Gray and B Hunter, 2016, 'Wages, Government Payments and Other Income of Indigenous and Non-Indigenous Australia', *Australian Journal of Labour Economics*, vol 19, no.2 pp. 53-76.

¹¹ Our Watch. (2018). *Changing the picture: A national resource to support the prevention of violence against Aboriginal and Torres Strait Islander women and their children*. Melbourne: Our Watch.

¹² Australian Women Against Violence Alliance (AWAVA). (2019). *Submission to the Senate Inquiry into the Social Security (Administration) Amendment (Income Management and Cashless Welfare) Bill 2019*, available from: https://awava.org.au/2019/03/07/submissions/submission-on-cashless-debit-card-trials?doing_wp_cron=1566952852.2084279060363769531250, accessed 23 September 2019.

¹³ Hunt, Janet. (2019). *Submission to the Inquiry: Social Security (Administration) Amendment (Income Management and Cashless Welfare) Bill 2019*, retrieved from:

In fact, submissions to the previous inquiry into Income Management and Cashless Debit Cards held by this Committee in April provided evidence that rates of gender-based violence have increased in some communities following the introduction of the Card. This demonstrates that the Cashless Debit Card program poses a real threat to the Government's priorities for gender equality and the Fourth Action Plan of the National Plan to Reduce Violence Against Women and Their Children. We refer the Committee to the submission made to the previous inquiry by our sister Alliance, AWAVA, which emphasized the importance of being able to access cash and income that is not tagged to a particular expense for women seeking to leave violent relationships. In this context, it is of extreme concern that the Bill currently under inquiry allows for the quarantining of up to 100% of social security payments on the Card at the discretion of the Minister, and with minimal safeguards or oversight.

The combination of the disparate impact on women and Aboriginal and Torres Strait Islander people, and Aboriginal and Torres Strait Islander women's increased risk of domestic and family violence, means the Cashless Debit Card has the potential to increase the vulnerability to and severity of the experiences of violence of Aboriginal and Torres Strait Islander women.

The right to freedom from gender-based violence is enshrined through CEDAW and the ICECSR. Further, we remind the Committee that earlier this year at the 63rd Session of the United Nations Commission on the Status of Women (CSW63), Australia committed to:

Improve the design, implementation and evaluation of social protection systems and nationally appropriate measures based on context-specific assessment of risks and vulnerabilities for all women and girls;

ERA urges the Committee to put this commitment into practice in its inquiry into the expansion of the Cashless Debit Card by bringing an intersectional gender lens to its report and recommendations and ensuring that legislation, including the amendment under inquiry, do not undermine the Government's gender equality priority to ensure that women and their children are safe from violence.¹⁴

Gender-Responsive Budgeting

Consideration of the intersectional gendered effects of policies can be a powerful means to promote gender equality as well as more efficient policymaking. A common technique used in this process is Gender-Responsive Budgeting (GRB). GRB analyses whether and how revenue collection and policy expenditure will affect women and men differently.¹⁵ It takes many forms and can be implemented at different stages within the policy process.¹⁶ GRB aims to ensure that policies either produce gender equal outcomes or redress current gender inequalities.¹⁷

GRB is widely accepted internationally as a means of assessing whether a country's resource allocations match its gender equality goals.¹⁸ More than half of OECD countries have implemented it or are in the process of considering or implementing it.¹⁹ Globally more than 90 countries have tried some form of

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/IncomeManagementCashless/Submissions, accessed 4 October 2019.

¹⁴ Department of the Prime Minister and Cabinet, (2019). 'Office for Women', retrieved from: <https://www.pmc.gov.au/office-women>, accessed 4 October 2019.

¹⁵ Stotsky, Janet. (2016). Gender Budgeting: Fiscal Context and Current Outcomes. *IMF Working Papers*, 16(149), 4.

¹⁶ Hodgson, Helen. and Morrissey, Suzy. 2017. *Gender Budgeting – Governments, Civil Society and Gender Bias in Tax Policy*. Conference Paper – Australasian Tax Teachers Association Conference, Wellington, New Zealand

¹⁷ Williams, Greta and Gissane, Hannah. Forthcoming. *Analysing the Gap: Enhancing Australia's gender-aware public policy process with Gender Responsive Budgeting*. ACT: ERA.

¹⁸ Sharp, Rhonda, & Broomhill, Ray. (2013). *A Case Study of Gender Responsive Budgeting in Australia* (Research Report) (p. 32). The Commonwealth Secretariat., 26.

¹⁹ Downes, Ronnie, von Trapp, Lisa., & Nicol, Scherie. (2017). Gender budgeting in OECD countries. *OECD Journal on Budgeting*, 16(3), 71–107.

GRB.²⁰ Moreover, while the different forms and contexts of GRB make it difficult to evaluate, recent studies show that in some countries GRB has contributed to gender-oriented changes in health, education and infrastructure budgets.²¹ The Cashless Debit Card is an example of a policy which has been implemented without consideration of its effect on women, evidenced by the fact that women are over-represented in its participants in trials to date.²² Without some form of GRB or other gender analysis in policy development, the Australian Government will continue to deliver policy which actively discriminates against women.

Recommendations:

- 1. Apply an intersectional gender lens in reviewing social security policy and legislation, including to the assessment of the Bill's compatibility with human rights.**
- 2. Investigate and consult on models of Gender Responsive Budgeting for integration into the budget process, including design of and changes to the social security system.**

The right to social security, and proportionality

The Bill's Compatibility Statement on Human Rights makes two key claims with regard to the right to social security. Firstly, that Cashless Debit Card program does not detract from an ability to access social security. Secondly, that the Statement argues that due to the intention of the Bill to reduce social harm, any limitation on the right to social security are reasonable and proportionate.

Regarding the first point on the ability to access social security, the Statement claims that the Bill:

does not detract from the eligibility to receive welfare, nor reduce the amount of a person's social security entitlement. Rather there is a limitation on how payments can be spent and provides a mechanism to ensure that certain recipients of social security entitlements are restricted from spending money on gambling and drugs.

This has not been borne out in practice. We refer the Committee to evidence presented to the inquiry held in April this year that the program is further impoverishing participants through a reduced capacity to buy good and necessities.²³ We note that this is consistent with the government-commissioned ORIMA evaluation, as demonstrated by the National Social Security Rights Network (NSSRN) submission to the same inquiry.²⁴ Further, although the Government has repeatedly emphasized that the CDC program and extension is a product of significant community consultation and support, through the submissions to the previous inquiry there is a clear body of evidence demonstrating that community consultation was selective,

²⁰ Sawer, Marian, & Stewart, Miranda. (2018). Gender Innovation: The Global Movement for Gender Budgeting. *Broad Agenda*, available from <http://www.broadagenda.com.au/home/gender-budgeting-why-we-need-it/>, accessed 23 November 2018.

Sawer & Stewart, *Gender Innovation: The Global Movement for Gender Budgeting*.

²¹ Williams, Greta and Gissane, Hannah. Forthcoming. *Analysing the Gap: Enhancing Australia's gender-aware public policy process with Gender Responsive Budgeting*. ACT: ERA.

²² National Aboriginal & Torres Strait Islander Legal Services, (NATSILS), Human Rights Law Centre. (2019). *Submission to the Inquiry into the Social Security (Administration) Amendment (Income Management and Cashless Welfare) Bill 2019*, available from: <https://www.hrlc.org.au/submissions/2019/3/29/submission-the-cashless-debit-card-is-a-discriminatory-and-coercive-policy>, accessed 23 September 2019.

²³ Klein, Elise and Razi, Sarouche. (2018). 'Contemporary Tools of Dispossession: The Cashless Debit Card Trial in the East Kimberley', *Journal of Australian Political Economy* 82: 84-106; National Social Security Rights Network (NSSRN). (2019). *The National Social Security Rights Network (NSSRN) submission to the inquiry into the Social Security (Administration) Amendment (Income Management and Cashless Welfare) Bill 2019*, retrieved from: https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/IncomeManagementCashless/Submissions, accessed 4 October 2019.

²⁴ National Social Security Rights Network (NSSRN). (2019)., *Ibid*.

and in fact does not account for the views and desires of many in the communities in which the program has been implemented.

Secondly, in the Bill's Compatibility Statement on Human Rights, the argument is that because the Bill is intended to reduce social harm, any restrictions on human rights to social security, non-discrimination, and self-determination are reasonable and proportionate. At the Bill states,

The Bill is compatible with human rights. The extension of the Cashless Debit Card trial and the transition of participants on income management to the Cashless Debit Card will advance the protection of human rights by ensuring that welfare payments are spent in the best interests of welfare recipients and their dependents by restricting spending on alcohol, drugs and gambling. The Cashless Debit Card program aims to reduce immediate hardship and deprivation, reduce violence and harm, encourage socially-responsible behaviour, and reduce the likelihood that welfare payment recipients will remain on welfare and out of the workforce for extended periods of time.

The statement goes on to argue that,

Given the objectives of the Cashless Debit Card Trial, the prevalence of social harm in the areas these scheme operate, any limitation on the right to social security is reasonable and proportionate.

The intention to reduce social harms does not render measures reasonable or proportionate. Again, we refer the Committee to the comments by Special Rapporteur Philip Alston,

The Compatibility Statement argues that the limitations posed... are proportionate to the legitimate aim of encouraging self-support. This argument, however, falls short of demonstrating... proportionality. According to the CESCR, the proportionality of a measure limiting the Covenant rights needs to be assessed against other available measure, so that it is demonstrated as "the least restrictive alternative" among all possible alternatives.

We suggest the Australian government must consider alternative measures before the Cashless Debit Card can be considered the "least restrictive alternative" available to reduce social harms for women, particularly Aboriginal and Torres Strait Islander women, who are the most significantly impacted by income management, and their children. Alternative measures would include commitments to investment in community services, including those run and operated by Aboriginal and Torres Strait Islander people and communities, investment in crisis, public and social housing, and reform of social security payments including Newstart Allowance.

Between 1991 and 2001 funding for social housing fell by 25%²⁵ (Toohey, 2014), and is now at historic lows²⁶ (RMIT ABC Fact Check, 2019). The consequences of this shortfall have particularly severe ramifications for women leaving violent situations, in particular, Aboriginal and Torres Strait Islander women. Aboriginal and Torres Strait Islander women and their children have extremely limited pathways to choose from when leaving violent situations, due an acute shortage in crisis and long-term housing, particular in regional and remote locations, and is associated with high rates of injury and death.²⁷ Increasing investment in crisis and public and social housing to support women leaving violent relationships is therefore in line with the priorities of the Fourth Action Plan to Support Aboriginal and Torres Strait Islander women and their children and Improve support and service system response.

²⁵ Toohey, Sarah. (2014). 'The failure of the housing system', in *Homelessness in Australia*, ed. C. Chamberlain, G. Johnson, and C. Robinson. Sydney: UNSW Press.

²⁶ RMIT ABC Fact Check. 'Have social housing levels fallen to historic lows?', ABC News, 27 September 2019, retrieved from: <https://www.abc.net.au/news/2019-08-12/fact-check-social-housing-lowest-level/11403298>, accessed 30 September 2019.

²⁷ Cripps, Kylie and Habibis, Daphne. *Improving housing and service responses to domestic and family violence for Indigenous individuals and families*, AHURI Final Report, 320, Melbourne: Australian Housing and Urban Research Institute Ltd (AHURI), 2019.

Finally, we refer the Committee to the considerable evidence put forward to the Inquiry currently held by the Senate Community Affairs Committee in support of increasing the rate of social security payments.²⁸ Reform of and increases to the rate of social security payments including Newstart Allowance, must be considered as an alternative measure for improving outcomes for people targeted for income management.

Recommendations:

- 1. Increase the rate of social security payments, including Newstart Allowance and Youth Allowance, and index payments to wages as well as CPI increases, to ensure they maintain parity with community living standards**
- 2. Increase investment in crisis and public and social housing to respond to the needs of women leaving violence, in line with priorities under the Fourth Action Plan.**
- 3. Redesign the Cashless Debit Card (CDC) program as opt-in only.**

²⁸ Parliament of Australia, (2019). 'Adequacy of Newstart and Related Payments and Alternative Mechanisms to Determine the Level of Income Support Payments in Australia: Submissions received by the Committee', retrieved from: https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/Newstartrelatedpayments/Submissions, accessed 4 October 2019.