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Senate Standing Committees on Community Affairs
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Adequacy of Newstart and Related Payments and Alternative Mechanisms to Determine the Level of Income Support Payments in Australia

The Australian National University Law Reform and Social Justice Research Hub ('ANU LRSJ Research Hub') welcomes the opportunity to provide this submission to the Senate Standing Committees on Community Affairs ('the Committee'), responding to terms of reference (f) and (h) of the inquiry.

The ANU LRSJ Research Hub falls within the ANU College of Law's Law Reform and Social Justice program, which supports the integration of law reform and principles of social justice into teaching, research and study across the College. Members of the group are students of the ANU College of Law, who are engaged with a range of projects with the aim of exploring the law's complex role in society, and the part that lawyers play in using and improving law to promote both social justice and social stability.

Summary of Recommendations:

1. That Newstart be increased to reflect current basic living standards, to meet the equitable requirements of the government to its people.
2. That the principles of equal access to justice, rule of law and equity should be upheld through social security legislation.

If further information is required, please contact us at anulrsjresearchhub@gmail.com.

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Preface

In our investigation and consideration of a range of material we have come to the conclusion that Newstart and other related payments are clearly inadequate, both in the pecuniary sense and in the ways they are administered. The Government ought to raise Newstart to accommodate for an acceptable standard of living in Australia, in line with its equitable obligations to recipients.

Introduction

This submission maps out some pre-existing reports and publications on the inadequacy of Newstart payments and the barriers in the current social services system. It adds two original case studies which reflect the difficulties associated with being on and applying for Newstart and related payments at the individual level. The following issues and terms of reference are addressed:

- Term of reference (f): the impact of the current approach to setting income support payments on older unemployed workers, jobseekers, and students;
- Term of reference (h): the adequacy of income support payments in Australia and whether they allow people to maintain an acceptable standard of living in line with community expectations and fulfil job search activities, and secure employment and training;
- In addition to the terms of reference given: it is argued that the legislative framework on which our social security system rests is crucial to considering the adequacy of Newstart and related payments. This is in light of how it affects those who require support in meeting the daily cost of living, and having control over their future, by entering work, study or training.

Finally, it is important to acknowledge the role of dominant economic interests and orthodoxy in shaping social welfare - in particular, policies molded by neo-liberal economic principles which lean towards 'market paternalism'. Examples of such policies and objectives include the underlying principle of 'mutual obligation', which have shaped the 'work for the dole' model (Wilson and Morris 2014, 203-204). These policies tend to be built on the view that unemployment is more likely to be a product of individual work ethic and shortcomings (Morris and Wilson 2014, 205) rather than systemic issues at play: in particular, the rates of unemployment, the need to match skill sets to a limited amount of jobs, competition for jobs in the marketplace, and underemployment. On the issue of underemployment, there may also be deficiencies in how unemployment is currently measured, where relatively small number hours can equate to employment, when such work is not enough to rely on for a living. This view is both unhelpful and untrue in many cases and must be challenged. As such, this submission emphasises and supports the point of view of people who are structurally disadvantaged, and acknowledges the role that sufficient welfare payments can play in increasing rates of employment, decreasing rates of attrition in university and making intergenerational change.

Key Proposals

We are writing in support of two key proposals: Firstly, the rate of Newstart payments should be raised to ensure that basic living standards can be met, and to improve the recipients' employment prospects and opportunities to contribute to the economy. Secondly, the principles of equal access to justice, rule of law and equity should be upheld through our social security legislation. It is important to take into consideration how a person's experiences with Centrelink, in fulfilling claim requirements or obligations attached to their payments, contribute to and compound hardships.

There has been much campaigning to increase the Newstart Allowance and other welfare payments, as well as its potential economic benefits in terms of increasing the size of the economy and workforce (Deloitte Report 2018). However, the experiences of applying for benefits and communications with Centrelink have created additional burdens for people who are already socially and economically disadvantaged. This includes robo-debt notifications, where the onus has shifted to the complainant and cases have only been settled after errors were found in the automated processes that is raising the debts. Even in cases where a person is not experiencing long-term unemployment, poverty, or is not vulnerable, these barriers can still interact with insufficient benefit levels to have costly, negative impacts at the individual and macro level.

For some, Newstart may be functional as short-term support until they are successful in finding a job, but combinations of long waiting times, structural inadequacies and low levels of payments are still burdensome for allowance recipients or applicants. Furthermore, the argument that welfare payments are so low because they are purely a short-term solution is not fact-based, with close to half of Newstart recipients remaining on the scheme for over two years.

As discussed in the 'Case Studies and Interviews' section below, evidence points to its limited success in improving the prospects of people experiencing entrenched disadvantage in all stages of life.

Recommendation 1:

- That Newstart be increased to reflect current basic living standards, to meet the equitable requirements of the government to its people.

The inadequacy of Newstart Allowances has been the subject of ongoing calls for a minimum \$75 dollar increase per week to Newstart payments made by the Australian Council of Social Services (ACOSS), which is built on the 2018 report by Deloitte, titled *Analysis of the Impact of Raising Benefit Rates*. A 2017 report titled *New Minimum Income for Healthy Living Budget Standards for Low-Paid and Unemployed Australians* by the University of New South Wales, ACOSS and the Catholic Social Services Australia, calculated that a single adult requires \$600 per week, while a family with two children requires \$1173 to afford to live at an acceptable

standard in Australia. Despite being a large increase from the current amount given on Newstart, these example budgets are restrictive; there is no allowance for leisure and accounts only for necessities (e.g. rent, groceries etc.). Given this report was compiled two years ago, this is a conservative estimate of what the minimum standard of living in Australia costs today. The report also found that many low- or no-income individuals or families were not receiving enough money to meet this minimum ‘bare-bones’ standard.

Case studies reported by organisations including ACOSS, Inside Story and Vinnies, and studies examining the implications of the current level of support provided by the Newstart Allowance on standard of living (Saunders and Bedford 2018), as well as health, quality of life and employment prospects have pointed to the inadequacy and ‘scarring potential’, both socially and economically (Morris and Wilson 2014, 203), of current levels of allowance, where it fails to address long-term unemployment and low economic status.

The study by Saunders and Bedford (2018) considers whether the welfare umbrellas of minimum wage and Newstart allowances are respectively able to support a ‘healthy living standard’ for individuals of varying family status. The authors found that the Newstart Allowance fell short of allowing an unemployed, single adult to meet such a living standard, which would align with a normative concept of ‘prevailing community standards.’ For a single person on Newstart, Saunders and Bedford calculated a 96 dollar shortfall per week between Newstart payments and the amount required to maintain a healthy living standard by applying budget standards developed by the authors, which they had priced in the June quarter of 2016. In developing their budget standard, the authors stated that they took into account normative data based on expert judgements of healthy living standards, behavioural data based on consumer behaviour, and experiential data on the spending behaviour of low-income individuals (Saunders and Bedford 2018, 275).

In a paper examining the potential effectiveness of proposed random drug testing for Newstart recipients, Sue Olney points to a number of root issues preventing people from re-entering the workforce, which paternalistic policies do not appear to address. Olney notes that after treatment for drug dependency, the chances of employment for people who have a criminal history or have been out of work for a long period of time are limited. They also note they will be hired subject to the conditions and perceptions of employers, complicating the narrative of unemployment. This includes judgments based on their individual traits and adversity (Olney 2017, 116-117). Additionally, people without a driver’s licence due to disqualification or inability to pay for a vehicle may be unable to undertake shift work at certain times, or work far from home (Olney 2017, 116). We would argue that in addition to these issues, the idea of drug testing welfare recipients again encourages the belief that unemployment or low employment is the result of individual failings. This fails to account for structural disadvantage and circumstantial hardships - it (conveniently) removes the onus from the government to make real change where it is their responsibility to do so, and places it on the individual.

Taking into consideration campaigns like ‘Raise the Rate’, and the findings of studies and stories from Australians living on Newstart and other payments, our ‘Recommendation 1’ would certainly echo those made by other in response to this inquiry.

Current Case Studies and Data:

Morris and Wilson carried out a study in 2014 based on interviews with 20 Newstart allowance recipients, as well as survey results from 54 Newstart and Youth Allowance recipients. The authors examined the impact of the declining Newstart payment on poverty and explored how to ‘better understand how high-pressure job search under paternalistic benefit conditions may be contributing to scarring experiences among the jobless’ (Morris and Wilson 2014, 209).

The survey results found that financial stress was ‘prevalent’ among respondents. Interviewees in this study, three of which were highlighted by Morris and Wilson, likened their circumstances to merely ‘survival’ (Morris and Wilson, 210). Their experiences of managing the cost of day-to-day living on Newstart payments often entails falling short on money before their next payment, with virtually no opportunities to accumulate any savings. Participants reported their reluctance to seek medical advice due to the cost, poorer diet and occasions where utility supplies have been cut off, with severe consequences for health and wellbeing in both hot and cold seasons. Allowing for the possibility of sampling error and the limits of a small sample size, the authors also suggest that the study participants’ circumstances may also be reflective of the ‘particular disadvantage of [their] inner-Sydney cohort’ (Morris and Wilson, 211). As highlighted in the stories published by the ‘Raise the Rate’ Campaign (see <https://raisetherate.org.au/stories/>) and community organisations like Vinnies (see <https://record.vinnies.org.au/2019/autumn-winter-2019/raising-the-rate-of-newstart>), the experiences of people receiving Newstart, particularly the most disadvantaged or those without a support network, show a reality where people are living entirely payment-to-payment, while unforeseen costs can cause or deepen financial distress.

In terms of housing, the more recent 2019 Anglicare Rental Snapshot found that there are virtually no (close to or at 0% of all properties, out of a total of 69,485 property listings assessed over a single weekend in April 2019) rental properties which were affordable to single Newstart or Youth Allowance recipients (Anglicare 2019, 7). This has been a consistent trend over the previous seven years, where the percentage of property listings that could be considered affordable to such individuals has been less than 1% (Anglicare 2019, 11). The meaning of ‘affordable’ in this report is based on the benchmark that rent is no more than 30% of the total low-income household budget, beyond which it would be considered to be causing ‘financial stress or hardship’ (Anglicare 2019, 6).

This study, as well as various case studies by community organisations and shared in the media, highlight the non-financial aspects of the hardship. These include a sense of isolation and stigma around extended unemployment, as well as the challenges of competing in the labour market. Beyond the items needed for ‘survival’, a number of interviewees in Wilson and Morris’ study also discuss the effects of unemployment and low benefits on their social networks and leisure time. Jim, one of the participants highlights the stigma of long-term unemployment: “once people find out that you are unemployed and for this long, basically they just don’t want to know you”. As noted by the authors, the costs of food, drink and public transport also limits the amount of time these participants have been able to spend building their social networks or enjoy leisure time (Morris and Wilson 2014, 215) .

Original Anonymous Case Studies and Interviews:

These case studies reflect participant first-hand experiences and should not be discounted as merely ‘anecdotal evidence’. They provide insight into the lived experiences of Australians and it is important for the elected members of Parliament to hear them.

Case Study 1:

P is a 21 year old student who has been working and studying away from home since 2017. Since then, she has been studying full-time in a double-degree, and worked part-time at the same job, working 20-28 hours a week on average. Although P lives away from home and qualifies as ‘self-supporting through work’, she has not been able to claim any Centrelink payments for the majority of the time she has been studying.

She receives some assistance from her parents for medical and car costs, but has been supporting herself day-to-day since mid-2017. In her most recent semester, she has had to underload her courses in order to support herself financially while managing course workload and attendance requirements. For P, a major barrier to accessing Centrelink support has been ineligibility due to age, which has meant that Austudy has been unavailable to her for much of her degree. She has also been ineligible for Youth Allowance as the assessment for her claim still considers her parent’s income, despite P meeting the criteria for being ‘independent’: she lives away from home, and qualified as ‘self-supporting through work’, having worked over 15 hours per week for a period of two years to support herself. Although P’s parents earned just above the threshold, their other financial commitments (including supporting P’s siblings) meant that they could provide little financial support for P apart from car and medical costs.

P says that this type of situation has been a ‘Catch-22’: despite being financially independent on day-to-day costs, the inclusion of her parent’s income as part of her claim has meant that she is outside the threshold for Youth Allowance. Having access to payments would have helped her bridge the gap in P’s ability to support herself for the majority of her university degree, and ease some of the expectations shifted to her parents (that they were unable to meet). Incidental costs arising from a traffic accident, rental bonds, reduction in hours at work and a fall in weekend penalty rates are other factors, some beyond individual control, which have affected her ability to cope with the cost of studying away from home.

As noted by case studies published by organisations like Vinnies and ACOSS, as well as scholarship on living standards, her financial situation may not be adequately supported even when she becomes eligible at age 22 for payments like Austudy (or Newstart, if she completes her studies and is looking for work).

P also manages chronic sleep issues, generalised anxiety, seasonal affective disorder and ADD/ADHD. Overall, the ongoing demands of work and study away from home have adversely impacted her health and wellbeing, and conversely, her ability to manage these work/study commitments.

These conditions are of particular relevance to P's experiences with Centrelink, as the criteria for obtaining exception through mental health issues has been a source of frustration for P, particularly in relation to the requirement of 'long term issues that have not improved with treatment'. P highlights the strain of long waiting times with regards to the time and effort required to get proof of mental health conditions, only "to get nothing back". This has further contributed to the negative effects on P's financial and mental wellbeing in her experience with seeking assistance from Centrelink.

The Impact of Insufficient Income-support on Students

It is estimated that in 2018 over 50,000 students dropped out of university in Australia (Norton 2018, 8). The loss resulting from this is not just to the individuals (approximately two-thirds of which believe they would be better off having finished) who incur on average \$12 000 in debt as well as lost earning potential, but to society as a whole (which benefits from having successful graduates of higher education) (Norton 2018, 3). A 2016 report found that the "graduate premium" in Australia loomed large with "[t]he median female graduate in 2016... expected to earn nearly \$600,000 more over her career than the median female school leaver", with the figure being even larger for males (Norton and a Cherastidtham 2018, 91-92). Insufficient income is a clear factor in attrition rates, and as such can be partially addressed by appropriate financial aid.

According to a Grattan Institute report, students like P are at an increased risk of dropping out (i.e. for working 20-28 hrs per week) (Norton 2018, 28). Although P is a full-time student, many students who need to work over 10 hrs per week to support themselves study part-time as they are time-poor. According to the Grattan Institute report "[p]art-time study is the single biggest risk for non-completion, largely because most part-time students have other major responsibilities at home and at work" (Norton 2018, 23).

Low benefits can also increase the pressure faced by students from low socioeconomic or disadvantaged backgrounds in entering and remaining engaged in higher education. Non-financial pressures for these individuals, especially those who are 'first-in-family' students, include the absence of 'a culture of higher education' in their families, and as a result, a potentially 'higher learning curve' as they settle into university (O'Shea, 2015). Being able to enter into and complete a degree at university not only allows students to have some control over their future and gain skills as they enter into the workforce, but also has an enabling effect for other family members of first-generation university attendees to pursue higher education (O'Shea, 2015).

Furthermore, according to a briefing by the Australian Council for Educational Research on student retention "[f]inancial difficulties... did represent the main reason for stopping for eight percent of the attrition group, and they were a factor considered by over one-fifth of the attrition group. Five percent said that problems juggling study and work were their main reason for discontinuing and over one-quarter said this was one of the factors in their decision" (2011, 8).

This again points to the crucial nature of income support for disadvantaged students: with the risk of attrition being significantly lowered where a student is able to study full time.

For P, and many other students, receiving sufficient income support from welfare payments can mean the difference between completing university and dropping out. This support being available, as well as being accessible in a way that does not put excessive emotional and mental strain on students is crucially important for individuals, and in the long term for the prosperity of the Australian economy.

Case Study 2:

Persons in this case study have been de-identified for privacy purposes.

‘S’ is a woman who receives welfare payments herself - she also has experience as a nurse at a homeless and community centre. As such, she has had first-hand experience with people who have low or no income.

S shared that she has had multiple experiences with patrons of the support centre who are clearly suffering from extreme cases of mental illness, but who are not receiving disability support payments, but are instead on Newstart or Youth Allowance.

She indicated that many are not able, or well enough, to access the health care system in order to receive the appropriate documentation to apply for disability payments. These same people struggle to keep up with the job-seeking requirements of Newstart and are put in the distressing position of being cut-off from their welfare payments.

S recounted a story about one such woman (M), who came to the centre seeking accommodation. She described her as “manic” but “friendly” and said that she was “easily swayed” by the suggestions of others. M did not have enough money for accommodation at the homeless shelter for the night (S indicated that the average cost of staying in a homeless shelter was \$170 per week, including two meals a day). S paid \$50 out of her own pocket so that she would be able to stay the night. M did not end up staying that night, as she left to follow some other people and did not return that night.

S later had M escorted to a mental health clinic where she received treatment for her mental illness. She stayed there for over 3 months.

The Effect of the Added Barrier of Mental Illness:

The example given by S exemplifies the barrier of mental health issues when accessing social services. The welfare system is not designed to be accessible to those with mental health issues - and in fact can exacerbate mental health issues through stress caused from cancelled payments, ‘robo-debt’, or requiring excessively high levels of ‘authentication’ of serious mental health issues that can be expensive to obtain, and particularly difficult when you have

no stable living situation. This issue is also touched on in the earlier case study with P, who experienced frustration trying to gain mental health exceptions through Centrelink. The system is needlessly difficult and should be altered to reflect the needs of the people it is supposed to support.

Recommendation 2:

- That the principles of equal access to justice, rule of law and equity should be upheld through social security legislation.

The Relevance of the Rule of Law and the Role of Equity to Newstart

Legal Framework for Newstart and the Rule of Law

The legislative and policy framework for social security, including Newstart (under the Department of Education, Employment and Workplace Relations (DEEWR)), is extremely complex and difficult to navigate and therefore, to evenly apply. The principle of the ‘rule of law’ in Australia is, in its broadest sense, intended to ensure all citizens are equal in the eyes of, and accountable before the law. To achieve this, laws must be transparent and applied consistently to each person, and be understandable and navigable to ensure that all have benefit under the laws. The social security framework is needlessly convoluted in Australia and makes it difficult to fulfil this basic principle.

The framework of social security in Australia is made up of the *Social Security Act 1991* (Cth), the *Social Security (Administration) Act 1999* (Cth) and the *Social Security (International Agreements) Act 1999* (Cth). According to the Australian Law Reform Commission, ‘[i]n some circumstances, the Ministers responsible for the Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) and the DEEWR have the power to make determinations—either in writing or by legislative instrument—which, in effect, have the same legal force as if they were in social security legislation itself’. The head of FaHCSIA and DEEWR—the Secretary, in each case—is occasionally given similar powers to make directions under social security legislation’ (*Family Violence and Commonwealth Laws Improving Legal Frameworks* ALRC Report 117/5). Another component is the ‘e-reference’ (electronic guideline) used by Centrelink as part of the policy framework. This is not publicly available, which adds yet another veil to an already non-transparent and challenging process.

The interconnected ways in which these pieces of legislation interact, the discretion of ministers to make determinations in certain situations and the numerous amendments made to the legislation affect its quality as a legal instrument and ultimately leads to inconsistent outcomes. Arguably, this legislation, which specially affects already disadvantaged and disenfranchised groups in our society needs to be *more* transparent and accessible than others, as it is crucially important that people have the opportunity to understand how it applies to them and their circumstances. Moreover, it needs to be applied consistently, so that people are

not unfairly disadvantaged by the misapplication and misadministration of our welfare legislation. Some of the miscommunication and aforementioned difficulties faced by people when dealing with Centrelink is likely because the framework on which it rests is itself unclear.

The Role of Equity

“Let your conscience be your guide”, was stated by the Honourable Justice Chris Maxwell AC as the opening to the 2019 Law Oration. This advice, he noted, was given to Pinocchio by Jiminy Cricket - still, it stands as an important motto in our society and in our legal and legislative systems. It could be that the Australian Government needs a reminder of its meaning.

The Australian Government is in a position of power over its most vulnerable people. Many of whom rely on social services to survive, to prosper and to take up opportunities. The Government owes these people an obligation to act in their best interests. To create and administer a comprehensible welfare system that is in line with basic standards of living, at a rate appropriate to our country. We would argue that this obligation to act in the best interest of low (or no) income earners, students, those on disability payments and other forms of welfare is a legal obligation arising under equity. The Government has made an undertaking to act on behalf of all its citizens – and its current conduct in the administration of welfare legislation and policy could be considered unconscionable.

The incidences of incorrect automated debt allocated by Centrelink (‘robo-debt’ notices) and debt recovery reveals the extent and consequences of the actual and perceived power inequality between the position of the Australian Government and people who receive, or have received, benefits in the past. For example, the recent case brought by Legal Aid Victoria, on behalf of Deanna Amato, had her \$2754 Centrelink robo-debt waived after the true overpayment was found to be merely \$1.48 (Legal Aid Victoria 2019). Another case is that of Madeleine Masterton, who after having her incorrectly calculated debt waived earlier this year (after bringing a legal challenge) is challenging the robo-debt system, with representation from Victoria Legal Aid, in the hopes that the Federal Court will continue to look at the lawfulness of the robo-debt process (Victoria Legal Aid 2019).

Although Centrelink has cancelled their debts, and those of many others, the broad impact of debt notices and recovery has affected, and will affect many others. The problem with the implementation of this system, where people have had to challenge or pay off debts they do not owe, has been criticised since the ‘Better Management of the Social Welfare System initiative’ Senate Inquiry in 2017. As noted in the 2017 Inquiry Report, citing the input of inquiry witnesses, people served with Centrelink debt notices may believe that the Government would not make such errors. The Report also acknowledged that individuals may be too afraid or otherwise lacking the support and resources needed to challenge their debt (Senate Community Affairs Reference Committee 2017, 4-5). Regarding the Legal Aid Victoria action, Deanna Amato highlights the fact that her debt had been “recalculated so easily” while people

are still required to “jump through hoops to prove [their] innocence” (Legal Aid Victoria, 2019). An automated debting process, with so many errors (which lead to serious consequences for people in vulnerable financial positions), should be properly reviewed for suitability of use by an agency with broad powers, actual and perceived, such as Centrelink.

As discussed in the above case studies, the struggles that every-day Australian’s face when applying for and receiving Newstart, conflict with the most basic aims of our social and legal systems. The repeated mistakes made by Centrelink in wrongly denying people the correct benefits, applying debt where none exists, being extremely difficult to contact over the phone or computer, requiring (sometimes degrading) hoop jumping (and now - an attempt to require drug testing of recipients) may point to gross inadequacy.

In the macro picture, the fact that Newstart has clearly not been sufficiently raised in order to keep in line with the cost of living in Australia is not only disappointing, but could be argued to be unconscionable conduct. The Government has access to all of the aforementioned information, it is aware of what a minimum standard of living in Australia requires, it has access to data about the long-term fiscal costs of unemployment and poverty and it knows that we as a country are falling short of our equitable obligations to our people, it is time to act - raise the rate.

Bibliography

Alan Morris and Shaun Wilson, 'Struggling on the Newstart unemployment benefit in Australia: The experience of a neoliberal form of employment assistance' 2014 25(2) The Economic and Labour Relations Review 2014 25(2), 202-201

Andrew Norton and Ittima Cherastidtham, 'Mapping Australian Higher Education' (2018), Grattan Institute, <<https://grattan.edu.au/wp-content/uploads/2018/09/907-Mapping-Australian-higher-education-2018.pdf>>

Andrew Norton, 'Dropping out: the benefits and costs of trying university' (2019) Grattan Institute, <<https://grattan.edu.au/how-to-reduce-university-drop-out-rates/>>

Australian Council for Educational Research, 'Joining the Dots research briefing' October 2011
<https://research.acer.edu.au/cgi/viewcontent.cgi?referer=https://www.google.com.au/&https_redir=1&article=1026&context=joining_the_dots>

Australian Law Reform Commission, 'Australia's social security framework' December 2011, <https://www.alrc.gov.au/publication/family-violence-and-commonwealth-laws-improving-legal-frameworks-alrc-report-117/5-social-security-overview-and-overarching-issues-2/australias-social-security-framework/#_ftn2>

Charis Chang, 'How much you really need to earn: A NEW study has revealed how much it costs to enjoy a healthy standard of living in Australia. And many people are falling short', *News.Com.Au*, August 2017, <<https://www.news.com.au/finance/money/budgeting/how-much-you-really-need-to-earn/news-story/3a0129a9bf36ad3a52de09dfe60780f0>>

Deloitte Access Economics, 'Analysis of the impact of raising benefit rates' Australian Council of Social Service (PDF Report, September 2018) <<https://www.acoss.org.au/wp-content/uploads/2018/09/DAE-Analysis-of-the-impact-of-raising-benefit-rates-FINAL-4-September-...-1.pdf>>

Peter Saunders and Megan Bedford, 'New Minimum Income for Healthy Living Budget Standards for Low-Paid and Unemployed Australians' (2017) UNSW Arts and Social Sciences Social Policy Research Centre

Peter Saunders and Megan Bedford, 'New Minimum Income for Healthy Living Budget Standards for Low-Paid and Unemployed Australians' 2018, 29(3) The Economic and Labour Relations Review, 273-288

Peter Sutherland and Allan Anforth, Social Security and Family Assistance Law (The Federation Press, 3rd Ed. 2013)

‘Rental Affordability Snapshot: National Report / April 2019’ Anglicare Australia (PDF Report, 2019) <<https://www.anglicare.asn.au/docs/default-source/default-document-library/final---rental-affordability-snapshots302da309d6962baacc1ff0000899bca.pdf?sfvrsn=4>>

Sarah O'Shea, 'Why first-in-family uni students should receive more support' *The Conversation* March 2015, <<https://theconversation.com/why-first-in-family-uni-students-should-receive-more-support-38601>>.

Senate Standing Committee on Community Affairs, Parliament of Australia, Design, scope, cost-benefit analysis, contracts awarded and implementation associated with the Better Management of the Social Welfare System initiative (Report, 21 June 2017).

Social Security Act 1991 (Cth) Social Security (Administration) Act 1999 (Cth)

Social Security (International Agreements) Act 1999 (Cth)

‘Stories’ Raise the Rate (Web Page) <<https://raisetherate.org.au/stories/>>

Sue Olney, ‘Should Love Conquer Evidence in Policy-Making? Challenges in Implementing Random Drug-Testing of Welfare Recipients in Australia’ 2017 77(1) Australian Journal of Public Administration, 114-119

The Record, ‘Newstart: Stories from the conferences’ St Vincent De Paul Society December 2018 <<https://record.vinnies.org.au/2018/spring-2018/newstart-stories-from-the-conferences>>

Victoria Legal Aid, ‘It felt like guilty until proven innocent’ – new test case against Centrelink’s robo-debt system’ Legal Aid Brief e-newsletter 12 June 2019

Victoria Legal Aid, ‘I have a duty’ – we’re challenging Centrelink’s robo-debt process’ Legal Aid Brief e-newsletter 6 February 2019