



Inquiry into the purpose, intent and adequacy of the Disability Support Pension

Senate Standing Committees on Community
Affairs





Contents

Executive Summary	5
Recommendations	6
Introduction	7
Fair and accessible social protection for people with disability	8
A responsive, humane and efficient eligibility system that reflects the nature and diversity of disability	9
Eligibility	10
‘Program of Support’	11
An income that promotes wellbeing and dignity	13
Safety and support for women with disabilities experiencing or at risk of family violence	14
A system that supports full economic participation by women with disability	17
Conclusion	18
References	19



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Statement of Recognition

Good Shepherd Australia New Zealand acknowledges the Traditional Custodians of the lands and waters throughout Australia. We pay our respect to Elders, past, present and emerging, acknowledging their continuing relationship to land and the ongoing living cultures of Aboriginal and Torres Strait Islander Peoples across Australia. We recognise that the perspectives and voices of First Nations peoples should be at the forefront of conversations about family, domestic and sexual violence in Australia.

About Good Shepherd Australia New Zealand

Good Shepherd Australia New Zealand was established to address the critical, contemporary issues facing women, girls and families. We work to advance equity and social justice, and to support our communities to thrive. We aspire for all women, girls and families to be safe, well, strong and connected.

For over 30 years Good Shepherd has partnered with community organisations and peak bodies, local, state and federal governments, and universities to work collaboratively and in place-based settings to improve outcomes for vulnerable people. Our service provision focuses on safety and resilience, economic participation and microfinance. Good Shepherd delivers services across Australia specifically for victim/survivors of family violence including but not limited to case management, family support work, counselling and accommodation. Throughout all of our programs, including financial counselling and capability building we have identified that domestic, family and sexual violence is a pervasive factor of vulnerability—and is often the reason for seeking support.

A central part of our purpose is to challenge the systems that entrench poverty, disadvantage and gender inequality; we do this through a range of research, policy development and advocacy activities.

Acknowledgements

We thank the practitioners from Good Shepherd client services who shared their practice wisdom with us and which we have referenced in this submission. Their insights from working with women, girls and families enhance our understanding for why the Disability Support Pension must provide a fair safety net for people with a disability who are unable to participate in full-time employment.



Executive Summary

First and foremost, the main objective of Disability Support Pension (DSP) must be to provide a fair and accessible social security system that recognises the challenges people with a disability face in participating in full-time employment.

Good Shepherd is concerned that it has become progressively more difficult for people with a disability to receive support under the DSP. Changes to the eligibility criteria in recent years has seen an increase in people with disability or chronic medical conditions forced to claim unemployment payments with strict mutual obligations requirements, which are inappropriate, punitive by nature, and not conducive to recovery or workforce participation for people living with disabilities.

The current DSP eligibility, assessment process and support levels leave too many vulnerable. Everyday Good Shepherd works with women with disabilities who are experiencing multiple and intersecting forms of discrimination and disadvantage. We are particularly worried that many are increasingly finding themselves in a poverty trap, struggling with high housing and utility costs and inadequate support payments. This is particularly concerning for women in situations of family and domestic violence where financial security and independence can play a critical role in enabling them to leave.

Good Shepherd advocates for a fair and accessible DSP that recognises the complexity and profound challenges women with disabilities, particularly those experiencing or at risk of family violence, face in their daily lives. They need support that promotes wellbeing and dignity.

Nine recommendations are made to inform the Committee's consideration of the purpose, intent and adequacy of the DSP.



Recommendations

Recommendation: Ensure people with a disability have access to DSP and develop a more holistic and person-centred approach to the DSP and its eligibility requirements to make it fairer.

Recommendation: Amend the preamble to the Impairment Tables so as to delete references to 'fully' as a qualifier to 'diagnosed', 'treated' and 'stabilised'.

Recommendation: Amend the eligibility rules to ensure the DSP acts as an accessible safety net for people with a disability when they are out of paid work.

Recommendation: Abolish the DSP program of support requirement.

Recommendation: Remove mutual obligations requirements for people with disability, regardless of age or disability status.

Recommendation: Review the current system of contracting external employment services providers, including providers' qualifications for trauma informed interventions and to work with people with disabilities acknowledging the barriers they face in seeking, gaining and maintain employment.

Recommendation: Raise the level of DSP to ensure people with a disability can live safely and with dignity.

Recommendation: Ensure the DSP process is responsive and safe for women experiencing violence.

Recommendation: Develop codesigned initiatives to ensure women with disability are granted appropriate opportunities and pathways to employment and supported to pursue self-directed paid work if desired.



Introduction

Good Shepherd Australia New Zealand (Good Shepherd) welcomes the opportunity to provide a submission to the Senate Community Affairs References Committee's inquiry into the purpose, intent and adequacy of the Disability Support Pension (DSP).

Informed by the practice wisdom of Good Shepherd financial counsellors, case managers and the experiences of our clients, this submission examines challenges faced by women with disabilities and women with disabilities escaping family violence in relation to the Disability Support Pension (DSP).

The term 'women with disability' is used in this submission on the understanding that the term is inclusive and supportive of anyone who identifies as a woman or a girl with a disability in Australia.

Good Shepherd's vision is that all women, girls and families are safe, well, strong, and connected. Good Shepherd acknowledges women with disabilities are strong, resourceful and resilient. Yet, women with disability throughout Australia bear a [disproportionate burden of poverty](#) and are amongst the poorest of all groups in society.

Women with disabilities not only experience gender inequality but they also [experience discrimination based on their disability](#). They experience multiple and intersecting forms of discrimination and disadvantage, which creates and perpetuates systemic inequality between men with disabilities and women with disabilities. This can mean that women with disability have far fewer opportunities to participate fully in economic, social and political development.

Women with disabilities experience all types of violence at higher rates, from a broader range of perpetrators, and over longer periods. As well as more well-known forms of violence, this can include reproductive violence, violence perpetrated by carers, and violence in disability services. Additionally, [over one-third of women with disabilities experience intimate partner violence](#).

[The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#) has heard numerous cases from women with disabilities who have experienced forms of both physical and non-physical violence and abuse.

Compounding the issue of violence and abuse is that [41% of people receiving](#) the DSP live in poverty. This is particularly concerning as the poverty leaves women more vulnerable in situations of family and domestic violence. The [relationship](#)



between the economic insecurity women with disabilities face and the abuse they are much more likely to experience must be acknowledged.

While there is a considerable lack of disaggregated data and research on the economic situation of women with disability in Australia, Good Shepherd argues that gender inequality contributes to women with disabilities having a more difficult time accessing support structures. In addition to the negative impact of structural gender inequality, the changing nature of the labour market and high housing costs pose profound challenges for women with disabilities.

The following sections address Terms of Reference a, b, g, i and k. In summary, Good Shepherd calls for:

- Fair and accessible social protection for people with disability
- A responsive, humane and efficient eligibility system that reflects the nature and diversity of disability
- An income that promotes wellbeing and dignity
- Safety and support for women with disability experiencing or at risk of family violence
- A system that supports full economic participation by people with disability.

Fair and accessible social protection for people with disability

The main purpose of DSP must be to provide a fair and accessible social protection for people with disability who are unable to seek, gain or maintain an adequate income through employment.

The stated purpose of DSP is to provide income support payment for people who are aged 16 and over but under Age Pension age (at claim) and who have reduced capacity to work because of their disability. However, successive government reforms have made it increasingly difficult for people with a disability to qualify for the DSP. There has been a disturbing downward trend of people with a disability successfully claiming the DSP, largely due to changes to eligibility criteria.

Good Shepherd believes that gender inequality contributes to women with disabilities having a more difficult time accessing support structures. While the likelihood of experiencing disability varies by age it does not vary significantly by sex, yet males (4.4 %) are more likely to receive DSP than females (3.8%). Women (38%) are accessing the NDIS significantly less than males (60%). It should also be noted national NDIS participation for First Nation peoples was 6.8% and for



Culturally and Linguistically Diverse (CALD) participants it is 9.4%. These numbers highlight the difficulties women and vulnerable groups have accessing support structures.

Within this context Good Shepherd advocates for developing a more holistic and person-centred approach to the DSP and its eligibility requirements.

Recommendation: Ensure people with a disability have access to DSP and develop a more holistic and person-centred approach to the DSP and its eligibility requirements to make it fairer.

A responsive, humane and efficient eligibility system that reflects the nature and diversity of disability

Good Shepherd is concerned that the DSP criteria, assessment and determination does not properly recognise the complex and multi-faceted nature of disability.

As highlighted in ‘Hannah’s’ case study below, the current approach to DSP fails to properly assess the impact of disability on people’s lives and can delay and exclude access to the DSP if people have complex needs or if they do not have a diagnosis that “fits” within one specific impairment type. As a result, many people with a disability are forced onto JobSeeker despite facing significant barriers to employment.

Case study: Hannah ²

Complex health issues do not meet the criteria for the Disability Support Pension

‘Hannah’ is in her early 60s and has been on JobSeeker/Newstart for five years. She raised her children as a single mother while also looking after an elderly parent. While Hannah had a long career in an office setting, she has had several health challenges which mean that is no longer an option for her; these include a spinal injury, a diagnosis of leukaemia and a diagnosis of PTSD caused by multiple family tragedies. None of these diagnoses allow her to move onto the Disability Support Pension, so she must find a way to make ends meet on the JobSeeker/Newstart Allowance while also looking for some form of suitable work. Hannah is taking a course in Reiki therapy and is hopeful this qualification will allow her to find a viable career pathway given her limitations. However,

¹ Name has been changed.

² This case study appeared in Good Shepherd’s [Submission](#) on the adequacy of Newstart and related payments and alternative mechanisms to determine the level of income support payments in Australia.



Hannah's poor health means she is likely to remain dependent on JobSeeker/Newstart until she qualifies for the Age Pension, which is more than five years away. After much effort, she was able to secure public housing, which has helped to lower her expenses. However, Hannah still comes up short about \$300 per month due to a combination of her daily living expenses, health-related costs, transportation and an old credit card debt. She has exhausted her superannuation as well as any help she can expect from friends. Hannah's only other option to cut costs is to access free or subsidised groceries, but this takes time and energy, and these services are limited due to high demand. Hannah's long-term financial outlook does not hold out much hope, but she works hard to stay positive and do what she can to improve her situation.

'Hannah's' story highlights multiple issues with the DSP criteria, assessment and determination. It also brings into focus the lack of provisions for an aging female population with complex health issues (noting the [prevalence of disability increases with age](#)), an [alarming increase in older women's experience of poverty](#) and the increased number of [older women who are homeless](#).

Eligibility

[Disability](#) is an umbrella term for impairments of body function or structure, activity limitations or participation restrictions. While acknowledging that many disabilities are life-long, it is also important to recognise that it is common for people with disability to experience fluctuating conditions. Although episodic in nature, it can mean periods of severity that limit someone from financially supporting themselves through employment and/or meeting mutual obligation requirements of support payments such as JobSeeker.

The onerous evidence requirements associated with the eligibility for DSP act as a systemic barrier to the claims process. The DSP application involves complex qualification criteria, with rationale for some of the provisions unclear. Furthermore, to prove these criteria a woman with disability may need to make multiple specialist appointments which places her under significant financial pressures whilst she is applying for the DSP because of financial insecurity related to her medical condition.

Good Shepherd echoes calls from ACOSS, People with Disability Australia and Economic Justice Australia that the requirement that a condition be 'fully diagnosed,' 'fully treated' and 'fully stabilised' to be assigned an impairment



rating does not reflect the true nature of disability. Like others in the sector, Good Shepherd is concerned that the term “fully” is often misunderstood and leads to the rejection of claims.

The DSP needs to be more accessible to those people who have episodic disability and who may want to move in and out of employment as they are able.

Recommendation: Amend the preamble to the Impairment Tables so as to delete references to ‘fully’ as a qualifier to ‘diagnosed’, ‘treated’ and ‘stabilised’.

Recommendation: Amend the eligibility rules to ensure the DSP acts as an accessible safety net for people with a disability when they are out of paid work.

The current assessment of eligibility to the DSP based on medical diagnosis of impairment fails to properly assess the impact of disability on people’s lives and can delay and exclude access to the DSP.

The Impairment Tables expire on 1 April 2022 and [the Department of Social Services](#) is currently conducting consultations to inform a development of the next set of Tables. Good Shepherd hopes the review will ensure that people with disability or a medical condition who cannot work receive fit-for-purpose support, as the current Impairment Tables act as a barrier.

Currently, if a person is assessed as having an impairment rating of at least 20 points under the Impairment Tables, they are deemed to have a ‘continuing inability to work’ / a severe impairment. However, if a person scores more than 20 points across more than one Impairment Table but did not score more than 20 points under any single Table, they will generally not qualify for DSP until they have actively participated in a ‘Program of Support’ for at least 18 months over the previous three years. In practice, this means participating in Jobactive or Disability Employment Services (DES) programs.

‘Program of Support’

Good Shepherd supports voluntary and co-designed initiatives that facilitate women with disability’s economic participation. People with disability are less likely to be in paid employment compared with people without disability ([50% versus 80%](#)). They face multiple barriers seeking, gaining and maintaining employment. These barriers include, but are not limited to, a lack of flexible job design and workplace practices, difficulties in accessing reasonable workplace accommodations, inaccessible public transport to get to and from work, and social and cultural workplace attitudes including stigma around employing people with disability.



The 'Program of Support' in its current format does not reflect barriers experienced by people with a disability and is an unfair barrier to accessing DSP. It is unrealistic to expect that people with a disability can or should engage in compulsory job ready programs before or whilst accessing the DSP. If it is not abolished, it should at the very least be made voluntary.

Good Shepherd is alarmed by the number of women with disabilities forced to participate in Commonwealth funded programs designed to assist a person find or prepare for work, notably Jobactive and DES. A mid-term review of DES ([Boston Consulting Group, 2020](#)) stated that despite "reforms" in 2018 to make the system even more competitive, "significant concerns remain regarding the program's efficacy and efficiency". In the last four years the [Female Jobactive caseload](#) has gone from 339,484 to 505,812 a 48.9% increase and the [People with Disability Jobactive caseload](#) has gone from 181,134 to 249,414 an increase of 37.6%.

Furthermore, [the Community Affairs References Committee](#) has stated that the "JobSeeker Payment is not designed to support people with disability or a medical condition who are unable to work". The committee was of the view that "people who are unable to work because of a disability or a medical condition should receive the DSP for as long as their condition prevents them working". Good Shepherd supports this view.

Recommendation: Abolish the DSP program of support requirement.

Recommendation: Remove mutual obligations requirements for people with disability, regardless of age or disability status.

Employment service providers are regularly identified as problematic, making it difficult for people with a disability on JobSeeker, Youth Allowance or Parenting Payment to meet their mutual obligation requirements while failing to provide viable support into meaningful employment. This is consistent with data from previous [Good Shepherd submissions](#) and [research](#).

Additionally, Good Shepherd case managers maintain that mutual obligations requirements for women who are unable to work (or have been found with partial capacity to work because of a disability or medical conditions) are inappropriate, punitive by nature, and not conducive to recovery and workforce participation.

Good Shepherd case managers note that a number of clients are either on or applying for DSP for mental health reasons, particularly PTSD and anxiety caused by violence, and any interventions to get them back into the work force must include trauma informed interventions.



Consequently, a review is needed of the current system of contracting external employment services providers, including providers' qualifications to work with vulnerable people, and the incentivised method of paying providers which aligns their accountability with the government rather than with their clients.

Recommendation: Review the current system of contracting external employment services providers, including providers' qualifications for trauma informed interventions and to work with people with disabilities acknowledging the barriers they face in seeking, gaining and maintain employment.

An income that promotes wellbeing and dignity

With [41% of people receiving](#) DSP living in poverty, the DSP does not allow people to maintain an acceptable standard of living in line with community expectations.

People with disability face [higher costs of living](#) compared with people without disability. There are extra healthcare costs, medication, equipment, transport and housing costs. A third of people receiving Rent Assistance and [DSP live in households in rental stress](#), paying more than 30% of income on rent. People with disability are more likely to [experience financial insecurity](#) compared with other households. A recent study ([Phillips & Narayanan, 2021](#)) found climbing levels of financial stress among recipients of DSP.

The number of women with disability experiencing financial stress is concerning. Financial councillors have noted the inadequacy of DSP in ensuring women with disability have a basic standard of living.

"I'm on a disability pension and there is never enough money. You can't put anything aside. It just covers the basics and sometimes doesn't even cover that." (Household Relief client)

The number of women with a disability who are unfairly experiencing high levels of unresolvable debt is concerning. This is particularly pertinent for unsuccessful DSP applicants, who instead qualify for other, less appropriate income support payments. These can include Youth Allowance, Austudy, Abstudy, JobSeeker and Parenting Payment – each of which have eligibility criteria and activity testing that pose challenges for people with disability.

It is somewhat contradictory that changes to the eligibility criteria for the DSP have led to a [third of people](#) on JobSeeker considered to have a 'partial work capacity' because of a physical, intellectual or psychiatric impairment. The term 'jobseeker' cannot fairly be applied to many of those who rely on the JobSeeker payment, and this is particularly so for people with a disability who have been left with no other option for income support.



Good Shepherd is troubled by the low level of payment. Economic insecurity is one of the reasons people feel unable to leave a violent relationship, and why some may return to violent partners. While the Federal Government has made a substantial commitment to addressing family violence, more attention needs to be paid to the ways in which the social security system creates barriers to the safety of women with disabilities and their children.

Additionally, the compliance regime that underpins access, causes harm to many people in the community, particularly those who are experiencing complex forms of disadvantage.

In line with the sector, Good Shepherd urges the Federal Government to increase the rate of each income support payment to meet the average cost of living of their recipients and to ensure that people's rights to a basic standard of living is met.

Recommendation: Raise the level of DSP to ensure people with a disability can live safely and with dignity.

Safety and support for women with disabilities experiencing or at risk of family violence

Good Shepherd strongly argues that the DSP must support women with disabilities who are vulnerable in situations of family and domestic violence. The complexity of the DSP process is particularly concerning for women with a disability who are leaving violence, as they are already navigating systems and process (like intervention orders, police, children, child protection, family law court, perpetrator having access to children). As highlighted in 'Kelly's' case below the DSP application process is unjustifiably taxing on women's time and emotional resources.

Case study: Kelly³

The impact of family violence

'Kelly' is a single mother with three children, 11, 14 and 15. Kelly's relationship broke down due to long history of family violence. She has spoken with her case manager about the trauma associated with her family violence experience in conjunction with single parenting as being really challenging.

³ Name has been changed.



Kelly has post-traumatic stress disorder (PTSD) and anxiety caused by the violence she experienced. She has been diagnosed with bipolar disorder. She is currently in the process of applying for DSP. While the Centrelink staff seem sympathetic, they are limited by the support they can offer.

Navigating the complex system, which requires her to attend multiple medical appointments and fill out countless forms, adds to her anxiety. She finds making and attending multiple appointments an impossible task because of her PTSD.

She is finding the process severely stressful, both by how long it is taking her to get her application together and by the financial and personal pressure she is under.

Kelly receives no financial support from the perpetrator and while she is applying for DSP, she is on JobSeeker. She has difficulties complying with mutual obligation requirements with everything else on her plate. She is worried about money and ensuring her children stay safe.

Good Shepherd case managers noted that the thought of having to attend multiple appointments for someone who is experiencing trauma and anxiety can feel impossible. When women are escaping family violence situations, this can be heightened because the perpetrator lives in the area, or they have previously been assaulted. Thus, the onerous evidence requirements associated with applying for the DSP is a barrier.

Additionally, Good Shepherd case managers maintain that mutual obligations requirements for women who are unable to work (or have been found with partial capacity to work because of a disability or medical conditions) are inappropriate, punitive by nature, and not conducive to recovery and workforce participation.

Good Shepherd case managers note that a number of clients are either on or applying for DSP for mental health reasons, particularly PTSD and anxiety caused by violence, and any interventions to get them back into the work force must include trauma informed interventions.

Case study: Case manager concerns

Perpetrators of family violence and their impact on women with disability

Perpetrators of family violence will often use a woman's mental health or disability as a tactic to threaten and control her.



If a woman with a disability has a diagnosis, she may be too scared that the perpetrator will tell Child Protection and the Family Law court she is “crazy” or “unable” to look after her children.

Additionally, women with un-diagnosed disabilities are often frightened to talk about their disabilities and seek support because they think it will reflect on their parenting capacity, and they worry about how they will be perceived by Child Protection and the Family Law court.

Consequently, women with disabilities fleeing violence are left to struggle on JobSeeker or ParentingNext with mutual obligation requirements, resulting in increased stress and financial hardship.

Good Shepherd case managers noted that some women with disabilities are hesitant to get a diagnosis (even for the DSP application) as they fear it could be used against them by a perpetrator. They fear losing custody of their children because their perpetrator has used their mental health or disability as a family violence tactic to threaten and control. While this is unlikely to happen, if a woman with a disability has been told that “she is crazy” and “unfit” to be a ‘good mother’ enough times, she at some point may start to believe it herself.

The levels of violence perpetrated against women with a disability and women is deeply alarming. A [2018 Brain Injury Australia study](#) revealed 40 per cent of domestic and family violence victims who attended Victorian hospitals over a 10-year period had sustained a brain injury. Of those, 86 per cent involved either intra-cranial injury or skull fractures, or in some cases both.

Good Shepherd case managers noted that many women who experience family violence incur Acquired Brain Injury (ABI) from abusive partner, but many go unrecognised or assessed. This highlights that proving eligibility for DSP would be challenging and the importance of having a holistic understanding of disability and the causes and impacts for women.

More needs to be done to ensure the DSP process is responsive and safe for women experiencing violence.

Recommendation: Ensure the DSP process is responsive and safe for women experiencing violence.



A system that supports full economic participation by women with disability

Financial security and independence are incredibly important, as they support improved physical and mental health, dignity and meaning for women with disabilities. In a post COVID-19 world a fair and accessible social security safety net is needed to support those with a marginal attachment to the labour market.

Most women with disabilities who can want to participate meaningfully in the workforce. Good Shepherd supports voluntary initiatives that enable women with disability to find, secure and maintain meaningful employment. However, this must be done through positive policy levers and in close consultation and codesigned with women with disability.

A recent study ([Gerards & Welters, 2021](#)) found that those subjected to benefit eligibility requirements, despite searching at least as hard, take longer to find employment. Moreover, they spend less time in employment in the first twelve months and, if employed, have jobs with lower wages and fewer hours compared to otherwise similar unemployed without benefit eligibility requirements. These findings are consistent with cognitive theories that emphasize that benefit eligibility requirements externalize job search motivation and increase stress, both of which reduce employment search effectiveness. This finding is confirmed by an analysis of OECD member countries which finds higher unemployment benefits are correlated to lower overall unemployment rates ([Grudnoff, 2021](#)).

Furthermore, researchers reported that an online survey of recipients revealed that receiving the Coronavirus Supplement and experiencing a relaxation in mutual obligation requirements supported people to engage in a range work-related behaviours ([Klein et al., 2021](#)). Respondents indicated this was due in part to practical changes in their circumstances (e.g., able to pay for internet) but also the reduction in stress that allowed them to focus on long-term goals. It is notable that the DSP was excluded from receiving the Coronavirus Supplement despite people with disability having an increased risk from a COVID-19 infection and also experiencing increased expenses, for example to have food delivered or to receive assistance in their home. Research by Kent et al. ([2020](#)) found that food insecurity during the peak pandemic period across 2020 was greatest for those with a disability.

Results from a recent study ([Collie, Sheehan & McAllister, 2021](#)) on health service use of unemployment and disability benefit recipients, highlighted that people receiving unemployment and disability insurance benefits use significantly more



health services than wage earners. This demonstrates that improving the income support payment could lead reduced need for expensive health and other services spending and increased workforce participation.

The literature above illustrates that by improving the income support payments and abolishing mutual obligations would have several economic benefits for persons with disabilities, their immediate households and broader support services and networks. This ultimately highlights that any system which seeks to encourage economic participation must recognise challenges and barriers through positive change in the provision of income support and appropriate opportunities to enable a pathway into the workforce if desired.

An array of voluntary models should be developed and codesigned to ensure women with disability are granted appropriate opportunities and pathways to open employment and supported to pursue self-directed paid work if desired.

Recommendation: Develop codesigned initiatives to ensure women with disability are granted appropriate opportunities and pathways to employment and supported to pursue self-directed paid work if desired.

Conclusion

Understanding the highly complex nature of women with disabilities' lives is critical to the designing a social security system that meets their needs. The current DSP criteria, assessment and determination does not properly recognise the complex and multi-faceted nature of disability.

Navigating the current system is stressful for individual women with disabilities – particularly women with a disability who are escaping family violence. They need a fair and accessible social protection that is responsive, humane, efficient and reflects the nature and diversity of disability in its eligibility system.

Additionally, an income that promotes wellbeing and dignity will also enable those who are able to, to meaningfully participate in the workforce.



References

- Australian Bureau of Statistics, (2018). [Disability, Ageing and Carers, Australia: Summary of Findings](#).
- Australian Institute of Health and Welfare, (2020). [People with disability in Australia](#). Canberra.
- Boston Consulting Group, (2020). [Mid-term Review of the Disability Employment Services \(DES\) Program](#). DSS. Canberra.
- Community Affairs References Committee, (2020). [Adequacy of Newstart and related payments and alternative mechanisms to determine the level of income support payments in Australia](#). Canberra.
- Cortis, N., & Bullen, J. (2016). [Domestic violence and women's economic security: Building Australia's capacity for prevention and redress: Final report](#) (ANROWS Horizons, 05/2016). Sydney.
- Davidson, P., Bradbury, B., & Wong, M. (2020). [Poverty in Australia 2020: Part 2, Who is affected?](#) ACOSS/UNSW Poverty and Inequality Partnership Report No. 4, Sydney: ACOSS.
- Department of Social Services, (2020). [DSS Payment Demographics](#). June 2019. [Data file].
- Department of Social Services, (2021). [DSS Payment Demographic Data](#). March 2021. [Data file].
- Collie, A., Sheehan, L. & McAllister, A., (2021). [Health service use of Australian unemployment and disability benefit recipients: a national, cross-sectional study](#). BMC Health Serv Res 21, 249.
- Frohman, C., (2014). ['Gender Blind, Gender Neutral': The effectiveness of the National Disability Strategy in improving the lives of women and girls with disabilities](#). Women with Disabilities Australia. Hobart.
- Gabbe, B., et al. (2018). [The prevalence of Acquired Brain Injury among victims and perpetrators of family violence](#), Brain Injury Australia, Sydney.
- Grudnoff, M., (2021). [Unemployment payments and work incentives: An international comparison](#). The Australia Institute. Sydney.
- Halliday, S. (2000, November 17). [Speech to the World Blind Women's Forum](#). Melbourne. [Speech].
- Employment Region Data, (2021). [Jobactive caseload data](#). [Data File]



- Kent K, Murray S, Penrose B, Auckland S, Visentin D, Godrich S, Lester E, (2020). [Prevalence and Socio-Demographic Predictors of Food Insecurity in Australia during the COVID-19 Pandemic](#). *Nutrients*. 2020; 12(9):2682.
- Klein, E., Cook, K., Maury, S. & Bowey, K., (2021) [Social security and time use during COVID-19](#). Swinburne University of Technology & Centre for Excellence in Child and Family Welfare. Melbourne.
- Li, J., Brown, L., La. H.N., Miranti, R., & Vidyattama, Y., (2019). [Inequalities In Standards of Living: Evidence for Improved Income Support for People with Disability](#). NATSEM, Institute for Governance and Policy Analysis, University of Canberra. Report commissioned by the Australia Federation of Disability Organisations. Canberra.
- McLaren, J., Maury, S. & Squire, S. (2018). [“Outside systems control my life”: The experience of single mothers on Welfare to Work](#). Good Shepherd Australia New Zealand. Melbourne.
- Maury, S. & Squire, S. (2018). [Submission on the adequacy of Newstart and related payments and alternative mechanisms to determine the level of income support payments in Australia](#). Good Shepherd Australia New Zealand. Melbourne.
- National Social Security Rights Network, (2018). [How well does Australia’s social security system support victims of family and domestic violence?](#) Surry Hills.
- National Disability Insurance Agency, (2021). [NDIS Quarterly Report to disability ministers](#). Report Q3 of Y8. Canberra.
- Parliamentary Budget Office, (2018). [Disability Support Pension: Historical and projected trends](#). Report no. 01/2018. Canberra.
- Parliamentary Budget Office, (2020). [JobSeeker Payment: Understanding economic and policy trends affecting Commonwealth expenditure](#). Report no. 03/2020. Canberra.
- Patterson, K., Proft, K., & Maxwell, J., (2019). [Older Women’s Risk of Homelessness: Background Paper 2019](#). Australian Human Rights Commission. Sydney.
- Phillips, B. & Narayanan, V., (2021). [Financial stress and social security settings in Australia](#). Centre for Social Research and Methods (ANU). Canberra.
- Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, (2020, December 2). [Disability Royal Commission seeking feedback on violence and abuse at home](#). [Press release].
- Gerards, R. & Welters, R., (2021). [Does eliminating benefit eligibility requirements improve unemployed job search and labour market outcomes?](#) Applied Economics Letters.
- Wilkins, R., (2017). [The 12th Annual Statistical Report of the HILDA Survey](#). Melbourne Institute: Applied Economic & Social Research. Melbourne.