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## **Pre-Budget Submission 2020-21**

Budget Policy Division  
Department of the Treasury  
December 2019

*[www.anglicare.asn.au](http://www.anglicare.asn.au)*

## Introduction

Anglicare Australia is pleased to make this submission to the Treasurer in regard to Australian Government's Budget for 2020-2021. It is based on the insight and expertise of Anglicare Australia's member organisations, and addresses the interest and experience of the people with whom they work.

## About Anglicare Australia

Anglicare Australia is a network of independent local, state, national and international organisations that are linked to the Anglican Church and are joined by values of service, innovation, leadership and the Christian faith that every individual has intrinsic value. With a combined expenditure of \$1.82 billion, and a workforce of 20,500 staff and 9,000 volunteers, the Anglicare Australia Network contributes to more than 50 service areas in the Australian community. Our services are delivered to 450,000 people each year, reaching over 1.33 million Australians in total. Our services are delivered in partnership with people, the communities in which they live, and other like-minded organisations in those areas.

Anglicare Australia has as its Mission "partner with people, families and communities to build resilience, inclusion and justice." Our first strategic goal charges us with reaching this by "influencing social and economic policy across Australia... informed by research and the practical experience of the Anglicare Australia Network."

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## Rebuilding the Safety Net

Across Australia, more than three quarters of a million people live on unemployment and student payments that do not cover the cost of housing, food, transport and healthcare. The single rate of Newstart is less than \$40 per day and living on Newstart and Youth Allowance presents the biggest risk to living in poverty. All of this means that lifting the single rate of Newstart, Youth Allowance and related payments would be the most effective step to reducing poverty in Australia.<sup>1</sup>

The evidence that these payments are far too low has been almost universally accepted for years,<sup>2</sup> and the business and community sectors have been calling for an increase over the past decade. The value of income support payments has eroded over time, as they have failed to keep up with wage growth and cost-of-living increases. The base rates of several income support payments, including the Newstart Allowance, have not been increased in 25 years. In fact, the value of Newstart has gone backwards in real terms.<sup>3</sup>

Australia now has the second lowest unemployment benefit in relation to average wages in the OECD. The OECD itself has reported that Australia's income support payments are insupportably low.<sup>4</sup> As a result, these payments now trap people in poverty and are widely recognised as a barrier in themselves to people finding work. This is because the payments for Newstart and Youth Allowance are so low people struggle to meet the costs of looking for work such as transport, childcare, and other essentials. Anglicare Australia's members have reported giving people in their employment programs additional financial assistance to cover costs such as these so they could participate.

Research by the University of NSW shows that the rate of the single unemployment payment falls short by \$96 per week to meet the cost of housing, food, basic healthcare and transport.<sup>5</sup> This research is now two years old, and since then, the cost of each of these basics has risen faster than the Consumer Price Index.<sup>6</sup> This highlights why Anglicare Australia has long called for an independent Social Security Commission, similar to Fair Work Australia or the Remuneration Tribunal. Such a body could independently assess the cost of living and set rates accordingly on a regular basis.

### **Recommendations: Increasing income support**

Anglicare Australia recommends the immediate increase of income support payments, using two mechanisms:

- establishing an independent Social Security Commission. The commission would have the power to set, and adjust, income support payments based on the actual cost of living and job seeking.
- immediately increase the rate of Newstart by \$96, and increase the rates of relate payments. This would provide much needed relief while a Commission is established for the long-term.

The fragility of the safety net and its orientation towards penalising rather than supporting people to find and stay in work is particularly problematic when considering that most suitable jobs for people with barriers to work are casual or do not offer consistent hours. The increase in casualised work and the 'gig' economy highlights the urgent need to review the settings of our welfare system to ensure that payments are meeting needs. This need was recently raised by the International Monetary Fund.<sup>7</sup>

The rapid tapering of a person's income support such as for people on Newstart and Youth Allowance is another major barrier to assisting people to stay in work, particularly for people whose first entry into the workforce is through a casual or part-time position. This tapering ignores the fact that it creates in effect a high marginal tax rate for people on very low incomes and stops them reaching minimum wage level through a combination of income support and variable casual or part time work.

For example, Newstart is just \$559 per fortnight for a single person, compared to the minimum wage of \$1481.60 (before tax) per fortnight. Yet a single person on Newstart has their income support cut by \$75 per fortnight for earning an extra \$254 a fortnight. This equates to just thirteen hours of paid work at the adult minimum wage rate. Rather than being rewarded for obtaining work and supported with income stability to reach minimum wage levels, people are effectively penalised for working. The disincentive created by this regime was a key reason for the Henry Tax Review and many other experts recommending that all welfare payments should be non-taxable.<sup>8</sup> Addressing these well-known holes in our safety net for people seeking work would have a significant positive impact on their chances of getting into work, their ability to live a decent life, and their overall wellbeing.

**Recommendation: Removing barriers to work**

Anglicare Australia recommends the removal of the deeming of people's payments so that all welfare payments are tax exempt. This will remove a key barrier to work and financial independence.

## Funding for the community sector Equal Remuneration Order

In the coming years, many community organisations will be faced with major cuts to the funding they use to pay their staff. This is because supplemental funding to support wage increases in parts of the community sector is due to expire.

In 2012, the Fair Work Commission made a landmark pay equity decision that raised wages in community services.<sup>9</sup> This was designed to tackle the gendered undervaluation of work across the sector. As a result, wages increases of up to 45 percent were ordered over a ten year period.<sup>10</sup>

To date, most governments across Australia, including the Federal Government, have provided funding for community organisations to pay fair wages without cutting services to their communities. Organisations with grants that began before 2012 have been receiving additional funds from the Federal Government.<sup>11</sup> This is helping them meet higher wage costs. Most services that began after 2012 have had higher wage costs factored in.

However, the Federal Government will stop paying supplemental funding on most grants from July 2021. The base rate of those grants will not increase to include the supplementation. If these base rates do not rise to reflect wage costs, it will lead to major funding cuts for community organisations with federally funded programs. This will lead to cuts in essential services that people across Australia rely on. It also means that gains in gender equity stemming from the order will be undermined by job cuts in the sector.

This issue affects all organisations who are receiving supplemental funding from the Federal Government. It also affects organisations that have contracts that are jointly funded by state and federal governments.

To meet this need, the Commonwealth must work with its state and territory counterparts to ensure that the base rate of affected grants is permanently increased to reflect higher wage costs. Alternatively, the Federal Government would need to ensure that supplementation for the Equal Remuneration Order continues.

Community organisations are already making staffing and strategic decisions based on assumptions about their funding. The community sector needs certainty, well in advance of July 2021. That is why the next Federal Budget must fund one of these measures.

**Recommendations: Funding for the community sector Equal Remuneration Order**

Anglicare Australia recommends:

- permanently increasing the base rate of affected grants to reflect higher wage costs; or
- continuing the supplementation for the Equal Remuneration Order.

## Helping vulnerable communities adapt to climate change

Anglicare Australia Network members are daily helping people with the reality of our overheating world. Our emergency relief services help people with the everyday stress of high power bills. These costs are worsened by poor housing that is expensive to heat and cool. Some parts of the Anglicare Australia Network help to provide affordable, energy efficient housing for people on low income. Others are policy and research experts on energy poverty and fair responses to climate change. Many of our members are partners in state and territory emergency action plans, or respond by helping people rebuild their lives after extreme weather and natural disasters.

We expect demand for emergency relief to grow. At the time of writing, bushfires have engulfed much of Eastern Australia and left some communities devastated. This has been exacerbated by the current drought, which has been the worst in living memory. The coming months will no doubt trigger reflection on policies affecting climate change mitigation, adaptation and emergency responses. It is critical that community services are included in these considerations.

Our work with people on low incomes has shown that they have the least ability to cope, move away from, or recover from extreme weather events and natural disasters being exacerbated by climate change. Some struggle to afford food when prices are affected by extreme weather and disasters. Many cannot afford to stay cool or warm during extreme weather, and this can have severe health impacts. Others have lost affordable housing which has too often not been replaced by governments after disaster events. Some members of our community, such as people with a disability, and the elderly, can also be particularly vulnerable during extreme weather events as they require additional assistance to react and recover. Geography also plays a part in deciding who is most vulnerable. For example, rural Australians need special attention in order to cope with and adapt to prolonged droughts and more frequent flooding.

With climate change now upon us, it is critical that we resource our communities and help them adapt. The community sector is often overlooked in climate policy. Yet as services on the frontline, we help those facing extreme events and provide vital support for the most vulnerable. Our sector must be resourced to support communities through these extreme weather events as they increase in number, length and intensity.

**Recommendations: Responding and adapting to climate change**

Anglicare Australia recommends:

- restoring and increasing funding for the National Climate Change Adaptation Research Facility as a key resource to help communities identify risks and opportunities and adapt to existing climate change.
- providing dedicated support for the community sector to adapt and respond to climate change impacts, and to support the community with adaptation and response. A climate adaptation fund would allow organisations to apply for funding to retrofit buildings, respond to extreme weather events, and better prepare their clients for the impacts of climate change.

## Reforming Employment Services

Anglicare Australia’s research shows that the job market is not delivering for those facing the greatest barriers to work – for example people who may not have qualifications or experience to draw on, those trying to re-enter the workforce after a long break, or those living in regional or remote areas.

Our most recent Jobs Availability Snapshot, released in October 2019, shows a grave situation for people facing these barriers to work. In our sample month, almost 705,000 people were unemployed, including around 100,000 jobseekers who may not have qualifications or experience.<sup>12</sup> But entry-level jobs (or ANZCO Level 5 jobs) were just 18,200 (ten percent) of the 174,000 jobs advertised. In other words, at least five of these jobseekers are competing for each job in their skill level.

The Snapshot shows that people with barriers to work are not being helped into work by existing employment services– and that the market cannot be relied upon to fix these problems without intervention. It also highlights major issues with the Jobactive Network.

### Fixing the Jobactive Network

There is now unprecedented agreement that employment services must be radically overhauled. The Jobactive Network has rightly faced intense scrutiny and criticism for its failure to offer genuine support and facilitate people into appropriate work, particularly people with additional barriers to securing a job. The current system reflects a lack of acknowledgement of the job market, with a consistent lack of entry-level jobs for those who need them.

The Jobactive Network simply isn’t helping these people into work. According to the Department of Jobs and Small Business, those who need the most help are spending an average of five years in the system. The Department’s own discussion paper on the future of employment services states that “almost half of the people in Jobactive have remained in the service for two years or more. Among the most disadvantaged job seekers (Stream C), the average length of time on the caseload is five years.”<sup>13</sup> The recently released report by Per Capita and the Australian Unemployed Workers Union also documents the failings of the Jobactive Network in detail.<sup>14</sup>

The Jobactive Network rewards providers who churn people through their service, even if they only get a short-term job. Providers are also getting paid to put people through training, regardless of whether that training isn’t linked to job opportunities or gaps in the workforce. Research from the Brotherhood of St Laurence shows that these training programs are not leading to work.<sup>15</sup> Clearly, the system is broken and must be overhauled as a matter of urgency.

Anglicare Australia rejects the notion that increasing competition will provide better outcomes for people who are unemployed or increase the quality of services.<sup>16</sup> Indeed the evidence shows that human services are poorly suited to marketisation and competition as a means to produce better outcomes for the people they are meant to serve, an observation echoed by the Productivity Commission.<sup>17</sup>



The outsourcing of employment services, particularly the inclusion of for profit providers, has opened the way for widespread roting of the system and harm to vulnerable people.<sup>18</sup> The Australian Government must recognise its responsibility for stewardship of the system and for ensuring people accessing government-funded employment services receive high quality support.

Governments must now think beyond employment services. Recent research by the Productivity Commission has found that despite 27 years of uninterrupted economic growth, the proportion of Australians living on “very low incomes” has not changed in these three decades.<sup>19</sup> This persistent disadvantage is one illustration that a new approach is needed to enable every Australian to have the opportunity to live a dignified life and participate fully in society. More broadly, the nature of employment has become more insecure and more casualised. Less than half of the employed population in Australia now holds a “standard” permanent full-time paid job with leave entitlements.<sup>20</sup> It is particularly difficult for young people entering the workforce, with nine-in-ten new positions created in 2017-18 for people under the age of 25 being part-time.<sup>21</sup>

To meet these challenges, Anglicare Australia has made several recommendations in our 2019 Jobs Availability Snapshot, and our 2018 submission on the future of employment services system.<sup>22</sup> Many of these could be acted on immediately. Research from our own services and members shows that a person-centred approach would be much more effective in supporting long-term employment outcomes.<sup>23</sup> Such an approach would acknowledge individual differences and situational factors, and recognises people’s agency, strengths and aspirations. Employment services should be immediately reformed along these lines to support people into appropriate training and work, and to provide ongoing assistance to help them stay in employment. This is particularly crucial for people experiencing long-term unemployment and significant barriers to work.

Employment services must also be decoupled from penalties such as the loss of government income support. The current regime creates more hardship and suffering for people who are already highly vulnerable and trying to survive on government income payments well below the poverty line.

### **Recommendations: Reforming employment services**

Anglicare Australia recommends:

- restructuring our system of training to ensure that training actually leads to work. This will involve working with people to identify their goals and assessing them against gaps in the workforce.
- investing in supported work placements, especially those that include tangible training opportunities.
- requiring employment service providers to follow-up with people and help them stay in work once they secure a job, rather than rewarding churn.
- ending financial penalties for those who depend on government income support.

### **Reforming employment services for people with disability**

As well looking at the Jobactive Network as whole, our research has also highlighted the failure of the employment services system to help people with disability. In the sample month of Jobs Availability Snapshot, 68 percent of those in Stream C of the Jobactive Network had a disability. This means that they are facing the greatest difficulties finding work. Jobseekers in Stream C spend an average of five years in the system before they find work.

On paper, Australia has several systems for supporting people with disability to find and keep work. But in fact, Australia has very poor rates of job participation for people with disability. In recent years, Governments have restricted access to the Disability Support Pension, so that more people with disability are reliant on the much lower Newstart payment. At the same time, Governments have failed to ensure people with disability have access to specialist assistance to find and keep work through the Disability Employment Services (DES) scheme. Even though the NDIS is meant to help people achieve their aspirations, there have been ongoing problems in getting employment goals recognised and funded in NDIS plans.

Anglicare Australia Network member EPIC Assist is a leading provider of disability employment services. They report that there have been persistent issues with the Employment Services Assessment administered by the Department of Human Services, which places people in employment streams. For people with disability, both the design and administration of the assessment are flawed. This helps explain the very high numbers of people with disability ending up in Stream C in the Jobactive Network, rather than being given access to specialist support through DES.

The result of these government policies is that more people with a disability are in highly precarious living circumstances struggling to survive on Newstart. They do not have access to specialist disability employment services, and many are at risk of losing payments due to harsh sanction schemes.

The Australian Government must urgently rethink how it supports people with disability to find and keep work. It is nonsensical to have the specialist DES program in place, and not give all people with disability automatic access once they are looking for work. Redirecting funding from Jobactive providers into an expanded DES program that supports all people with disability accessing government income payments would be an easy and obvious reform to current employment services that could be implemented quickly.

It is also clear that the rate of Newstart is inadequate for anyone, and even more so for people with disability. The eligibility criteria and assessment processes for the DSP must be overhauled to give people with disability access to a proper adequate income.

**Recommendations: Employment services for people with a disability**

Anglicare Australia recommends:

- restoring broader eligibility for the Disability Support Pension.
- Providing automatic access to Disability Employment Services for jobseekers with a recognised disability.

## Delivering Quality Aged Care

The aged care sector is in a time of unprecedented reform, and scrutiny. The ageing population has called greater attention to person-centred care and the shift towards providing care and support in the home. At the same time, the work of the Royal Commission into Aged Care Quality and Safety has shown that we are far from achieving our goals. The Government and the sector must work together to fund and deliver the care that older people deserve.

In its interim report, the Royal Commission has acknowledged the vast number of reviews into aged care that have already been done, and ignored.<sup>24</sup> The events uncovered by the Royal Commission are often shocking, but the issues that underlie them are not new or surprising. Many of the solutions are well known. There are several key actions that should be committed to in this Budget, outlined below.

### Reforming funding for residential care

Anglicare Australia supports removing the cap on the supply of residential care places by discontinuing the Aged Care Approvals Round (ACAR) as soon as possible. However, we are concerned that the Government does not have a strategy to ensure the financial sustainability of the sector. Financial sustainability for aged providers underwrites their capacity to provide quality care for people regardless of their background or circumstances. In lieu of developing such a strategy, the Government must make a greater commitment to funding residential aged care to meet the growing level of need in the sector.

There is clear evidence that recent funding freezes have placed pressure on the quality of care, and put many residential care facilities in financial peril. This Budget should restore the shortfall in funding from changes to the Aged Care Funding Instrument (ACFI), or reinvest the savings back into residential aged care.<sup>25</sup> This would provide some stability to the system while other major reforms are planned.

#### **Recommendations: Improving residential aged care**

Anglicare Australia recommends:

- restoring the \$675 million per annum cut from residential aged care funding
- creating provisions to ensure continuing supply of residential care services in areas with limited choice and competition
- funding the next stage of the Alternative Aged Care Assessment, Classification System and the development of a cost of care model
- developing a strategy to fund these changes.

### Implementing the Aged Care Workforce Strategy

Older Australians have the right to a high quality aged care system that delivers care and support to everyone who needs it, enables older people to live meaningful lives, and delivers quality outcomes. Aged care workers also have a right to work in an environment that is safe and enables them to provide the quality outcomes older Australians want and deserve. To do this, workers need to know their role is valued. They need to work in an environment with the right number of staff who have the right skills and qualifications to meet the needs of older people.

Reforms in aged care are predicated on a workforce with the values, education, experience and training to deliver quality services. Yet at the same time as the sector is trying to bed down systemic reform and meet growing demand for care, unpaid care is declining and more pressure is being placed on the paid workforce. This is exacerbated by competition for workers across aged care, the National Disability Insurance Scheme and the community sector. Now is the time for action on the number and skill mix of the aged care workforce.

The workforce roadmap laid out by the Aged Care Workforce Strategy Taskforce, *A matter of care—Australia’s Aged Care Workforce Strategy*, has strong support across the sector.<sup>26</sup> Many of the actions it recommends are foundational to ensure the right mix of skills and staff to meet the sector’s needs. In its interim report, the Royal Commission into Aged Care Quality and Safety has urged the Federal Government to fund and implement the Strategy now.<sup>27</sup> Anglicare Australia supports this call.

**Recommendation: Implementation of the Aged Care Workforce Strategy**

Anglicare Australia calls for the full implementation of the Aged Care Workforce Strategy. This includes the proper resourcing of the Aged Care Workforce Industry Council to oversee its implementation.

## Ensuring care in the home

As our population ages, it’s becoming more and more important that older people get the care and support they need at home. At its best, care is relational. It is built on consistent relationships between staff and clients, and is provided when people need it to keep them well as they age. These factors were explored in Anglicare Australia’s recent research report *Quality Jobs and Best Practice in Home Care*.<sup>28</sup> Sadly, the system current does not always support this approach.

The number of people choosing home care has increased by 84 percent over the past decade.<sup>29</sup> Anglicare Australia notes that 16,000 people died waiting for home care packages in the previous year, while another 120,000 remain on the waiting list.<sup>30</sup> Since the national wait list was introduced in February 2017, the wait list figures have consistently trended upward.

Anglicare Australia acknowledges the Government’s commitment to fund an additional 10,000 home care packages, announced after the Royal Commission released its interim report. However, there is still a major shortfall between the number of Home Care Packages and community need. The longer this goes on, the more many elderly Australians experience loss of health and quality of life. It also places more pressure on residential services when people are forced to enter the system prematurely, and on hospital services for those whose health has deteriorated. This Budget must see the Government commit to end the waiting list for home care packages.

The amount of unspent funding in Home Care Packages also remains a major concern. This is now estimated to have reached approximately half a billion dollars. Research must be done to understand the drivers for underspending on care, how to help people use their entitlements; and if necessary, redirect funds in the system.

**Recommendations: Improving access to home care packages**

Anglicare Australia calls for immediate action to improve access to home care packages. This means:

- increasing investment in home care, including immediately releasing more packages at levels 3 and 4, to directly reduce the number of clients waiting for care and support;
- researching the psychological drivers of people unnecessarily underspending on their own care at home, and identification of methods to address it at an individual and systemic level.

## Disability and Mental Health Support

The National Disability Insurance Scheme (NDIS) presents an historic opportunity for people with disabilities to receive the support they need to live contributing lives. We are now at a pivotal stage in the delivery of the NDIS, and in our view, fundamental questions relating to the provision of services remain unresolved. As we enter 2020, at such a critical stage in the implementation of the scheme, this is deeply concerning. The sector will be watching closely to ensure that recent changes to aspects of the Scheme are leading to improvements on the ground.

### Ending the NDIS underspend

Anglicare Australia was very disappointed by underspending on the NDIS in the last Budget. It appears that the current underspend on the NDIS sits at around \$1.6 billion, which is being used to fund the overall Budget surplus. Bureaucratic delays and people hesitating to apply for the Scheme are among the factors slowing down the roll-out, and contributing to the underspend.

The Federal Government has argued that the NDIS is fully funded, and that the outlays are meeting current demands for the scheme. Yet the NDIS has been underspent since its inception.<sup>31</sup> This is a direct result of problems with the way the scheme is being implemented.

To date, there has been a major discrepancy between ‘demand’ for those who have made it through the system and completed participant plans, and true demand for support. In its 2019 progress report, the Joint Standing Committee on the NDIS recognised that fewer participant plans completed have been than were expected.<sup>32</sup> The claim that NDIS is demand driven is simply untrue – there is recognition across the sector that many more people need support and services than are receiving them. It is too soon to tell whether changes put in place in 2019 have had a major impact.

The mental health, disability and social service sectors are united in their call for any unspent funds to be reinvested back into the NDIS until implementation issues are corrected. This is especially important as these sectors struggle to cope with the growing demands for services amidst the chaos of the NDIS introduction.

It is important that the NDIS remains within budget to ensure sustainability of the scheme for years to come. But it is far more important that it delivers safe and effective support to those who need it most. As the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability progresses, it is also critical that poor oversight and problems with the NDIS do not result in further cases of abuse or neglect.

Areas where additional funds could make a major difference include improvements to the IT systems of the National Disability Insurance Agency (NDIA), the interface between the NDIS and the healthcare system, reducing barriers for people trying to access the Scheme, increasing the number of NDIA workers to deal with the backlog of applications, improving NDIA worker training, funding disability advocacy, advice and assistance for plan development and coordination, and investigating the growing problem of poor quality services and fraud.

**Recommendation: Investing in the NDIS**

Anglicare Australia calls on the Federal Government to commit to reinvesting unspent funds from the NDIS to support people with disability and their families, and, to fixing problems with the NDIS. It should not be used to fund tax cuts or bolster other aspects of the Budget.

**A pricing model that works**

There is a growing recognition across the sector that the NDIS pricing model has not been working for either individual or group support. Experience from the Anglicare Australia Network also shows that the prescriptiveness of NDIS plans around staffing qualification levels are becoming an obstacle. These issues, as well as the unaffordability of travel, are particularly affecting rural and remote areas. It is unclear whether recent changes have made an impact.

Despite the scale of our services and experience in other competitive markets, parts of the Anglicare Australia Network have been unable to deliver NDIS services viably and have recently made the difficult decision to withdraw from providing services under the Scheme. Other service providers have found themselves in a similar position.

The next Budget must continue efforts to resolve these issues. It is critical that the Federal Government commits to working with the sector to address these problems. This could include looking to alternate funding models, such as block-funding, to address thin markets and ensure culturally appropriate services. Anglicare Australia notes that the Productivity Commission's 2017 Inquiry into Reforms to Human Services called for consideration of block-funding, and encourages the Government to investigate this with the sector.<sup>33</sup>

**Recommendation: Improving the NDIS pricing model**

Anglicare Australia recommends that the Government establish a process to address issues with the NDIS pricing model. This process must include representatives from the mental health, disability and social service sectors, and involve investigating recommendations from key reviews; as well as monitoring the impact of recent changes. These include the Productivity Commission's Inquiry into Reforms to Human Services and the Joint Standing Committee on the NDIS' inquiry into the Market Readiness for Provision of Services Under the NDIS.

**The NDIS and mental health**

The provision of services to people with psychosocial disabilities requires urgent attention. By far the biggest issue is that of unmet need. It is expected that 90 percent of people with psychosocial disabilities and many thousands of carers will not be covered under the NDIS.<sup>34</sup> While it is essential that the eligibility criteria for the NDIS are urgently clarified, doing so will not change the lack of funding for the level of services required to support Australians with psychosocial illness and disabilities and their families and carers, regardless of where that service is located (within the NDIS, in the community, or through clinical care pathways).

The eligibility criteria for the NDIS are not clearly defined for psychosocial disability, and this is resulting in inconsistent inclusion and exclusion of prospective participants. Given how restrictively the NDIS criteria are defined with regard to mental health, it is also clear that the level of unmet need will have implications for funding between the Commonwealth and state and territory governments.

As documented in the Productivity Commission’s Draft Report for its inquiry into mental health, there is still an overall lack of clarity and unfunded gaps in community-based mental health services for the vast majority of people who have mental illness that is not covered by the NDIS.<sup>35</sup> There is an urgent need for community-based mental health service gaps to be properly mapped and funded. In the interim, funding for programs outside the NDIS must have certainty.

We urge the Government to respond to these issues in the upcoming Federal Budget, and ensure that the NDIS doesn’t ultimately fail people with psychosocial disabilities.

**Recommendation: Identifying and addressing areas of unmet need in the NDIS**

Anglicare Australia calls on the Government to release funding to map NDIS-based and community-based mental health services. This would allow for the identification of geographic and service-type gaps and urgently address them.

While this work is done, funding guarantees must be provided to all community-based mental health services, including increases, to meet unmet need.

Anglicare Australia also supports several of the major recommendations from the Productivity Commission’s recent inquiry into NDIS Costs. In particular, we highlight Recommendations 4.4; 6.1; 7.1; 8.1; 8.2; 8.3; 12.3; and 13.1 from the Commission’s final report. We call on the Government to ensure that the NDIS and the NDIA are properly resourced so that these recommendations can be taken forward as part of the 2019-20 Federal Budget.

**Recommendations: Implementing the Productivity Commission’s Inquiry into NDIS Costs**

Anglicare Australia recommends the Government adopt the major recommendations of the Productivity Commission’s Inquiry into NDIS Costs. This would involve a commitment to:

- implement a psychosocial gateway as the primary pathway that people with psychosocial disability to enter the NDIS
- increase funding for Information, Linkages and Capacity Building (ILC) to the full scheme amount of \$131 million for each year during the transition
- address thin markets by considering block-funding; publicly releasing the Provider of Last Resort (POLR) policy and Market Intervention Framework as a matter of urgency
- ensure that price caps are set in a manner that is transparent and evidence-based, and subject to regular review
- transfer the NDIA’s power to set price caps for scheme supports to the National Disability Insurance Scheme Quality and Safeguards Commission by 2020.

**Ensuring funding for Royal Commission recommendations**

People with disabilities and their families need to know the facility they have chosen will provide safe, high quality, person-centred care that is grounded in respect, comfort and dignity. For years, Anglicare Australia has been calling for a Royal Commission into these issues and we strongly supported the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability when it was announced.



Previous reviews into the issues surrounding disability have offered valuable insights. But this Royal Commission has a much deeper remit, exploring the treatment of people with disabilities across society as a whole. Its hearings to date are already engaging the public in an in-depth examination of the elements underpinning dignity, respect, and quality care. It will also need to have the scope to make recommendations that go beyond changes to the disability sector itself.

It is also important that its recommendations are acted upon fully. Given the scope of Royal Commission's work, Anglicare Australia recommends that some funding be set aside in the next Federal Budget in anticipation of this expense.

**Recommendation: Anticipating costs from the Royal Commission**

Anglicare Australia recommends funding be set aside in the next Federal Budget in anticipation of implementing recommendations stemming from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability.

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## Action on Homelessness and Housing Affordability

It was not very long ago that it was accepted that everyone has a right to a home. The truth and value of a home for all of us has not changed, but the willingness of governments to see it has their responsibility to ensure everyone can have a home has. Our understanding of the vital importance of home to people's wellbeing has increased, yet public and community housing numbers have decreased as a proportion of the market. In recent years, governments have argued that it is up to the private market to provide a home for all.

But on every measure the private rental market is failing to deliver affordable shelter for millions of Australians, let alone what most of us understand as a home. Anglicare Australia's most recent Rental Affordability Snapshot surveyed over 69,000 rental properties on a sample weekend and found that on people living on income support payments can hardly afford rent anywhere.<sup>36</sup> Across Australia, there were only:

- 317 rentals were affordable for a single person on the Disability Support Pension
- 75 rentals were affordable for a single parent with one child on Newstart
- 2 rentals were affordable for a single person in a property or share house on Newstart
- 1 rental was affordable for a single person in a property or share house on Youth Allowance
- 0 rentals were affordable for a single person on Newstart or Youth Allowance in any major city or regional centre

Although these findings were stark, they are not isolated. Each year, the Snapshot has shown declining affordability. At the time of our previous Budget submission, the Australian media landscape was replete with commentary on the collapse of the housing market, yet rents in 2018 simply remained at the same unaffordable levels they were at in 2017.<sup>37</sup> And in the year since, affordability has been on a downward spiral with little mainstream discussion.<sup>38</sup> The crisis is so deep that the commentary lacks perspective.

The consequences of this are profound. Because rent is immutable and income is fixed, people cut spending on other basic needs and damage their own health, life, and prospects for shelter. Put simply, people go hungry, go without heating in winter and cooling in summer, can't afford essential transport and medical expenses, or have to deny their kids' involvement in school activities. Current policies on affordable housing bear almost no resemblance to those proposed by the sector and independent experts. They fail utterly to match the scale and urgency of the crisis.

The Everybody's Home campaign, which Anglicare Australia is a member of, has highlighted the fact that many people are paying 50 percent or more of their income in rent, and living with the constant threat of becoming homeless. Anglicare Australia Network members across the country work with people from all walks of life living in severe rental stress, or dealing with being locked out altogether due to unaffordability. There is little doubt that rates of homelessness are an underestimate given the number of people couch-surfing, returning to live with parents or other family even when the accommodation is unsuitable (for example, whole families cramming into single spare rooms) because they have no other choice. We are also seeing a growth in rates of homelessness and rental stress among older people, particularly older women. The continued shift towards a housing market that advantages existing property owners is seeing a growing number of older people locked out of secure housing at the very time that it is most essential to them.

Other impacts are less evident but as just serious. Without secure housing, it is much harder to maintain stable employment, have healthy family relationships, or pursue education. Anglicare Australia has case studies from our members of young people forgoing education and employment opportunities because they can't find affordable accommodation where they would need to live, and of women seeking to escape family violence being unable to move away from the perpetrator. Another critical issue is the relationship between housing and other services. Aged and disability care is much harder to deliver in poor quality, unaffordable, or insecure housing.

Anglicare Australia echoes the calls of the Everybody's Home coalition for an urgent investment in low-cost rental housing into the market. Having access to more low-cost rentals improves choice for those at the lower end of the market, and in turn make it cheaper and easier for other renters to find a home.

**Recommendation: Investing in new affordable rentals**

Anglicare Australia supports calls for an investment in 200,000 low cost rental properties for low and middle income earners over ten years. This could be aided with a new federal subsidy to leverage superannuation funds and other private sector investment.

### An urgent investment in social housing

How governments approach housing has changed over time. Until the nineties, direct investment in publicly owned housing was the preferred response to community need. In the 1950s, state governments built more than 100,000 homes – or one in eight of all homes built.<sup>39</sup> This stemmed from a recognition that housing, just like roads or rail, is critical infrastructure for the economy.

Over time, public and social housing has been recast as charity rather than infrastructure. Political support has dwindled. Social housing has been stigmatised and starved of funds. The chronic underfunding of social housing means that demand now far outweighs supply. According to the most recent figures from the Australian Institute of Health and Welfare, more than 195,000 Australians are waiting for social housing.<sup>40</sup> Around a third of those have been found to be in the greatest need, and many who are finally given a home are already homeless. For those who were homeless or at risk of homelessness, over half spent more than three months on the waiting list. And for those not yet on the brink of homelessness, half spent more than two years on the waiting list. The need for social housing will only grow, from 1.3 million to 1.7 million households by 2025.<sup>41</sup>

Governments have also been tightening eligibility for social housing so that only people in the most desperate situations can get help. This means that many Australians can no longer find affordable housing, and the social housing system no longer works in a sustainable way. Without the funding from rents of tenants with higher incomes, there is not enough income to maintain public housing stock. Governments have instead been transferring housing stock to community organisation management, with 23 percent of social housing now managed by mainstream or Indigenous community housing. But this does not change the lack of supply. It simply outsources the issues onto non-government organisations.

Governments have also resorted to selling off more properties to cover maintenance costs. This has created a situation where hundreds of thousands of Australians on low incomes are unable to find affordable housing. It also means that the social housing stock is dwindling and poorly-maintained, with state and territory governments losing valuable assets.

At every level, governments must reclaim their responsibility to ensure affordable homes for every Australian. Modelling shows that to meet demand, the Federal Government must invest in 300,000 new social and Indigenous homes.<sup>42</sup> The sector has united in calling for this investment through the Everybody's Home campaign.

This must be underpinned by a recognition that public and social housing is infrastructure. The Government has already acknowledged that infrastructure projects have the power to fuel Australia's sluggish economy. Projects so far have focused on roads and rail, yet most Australians would consider a home to be just as critical to their lives. Housing construction also has the potential to employ many thousands of Australians. For every dollar spent on housing people, there is a multiplier effect in savings from improved health and wellbeing – and a positive gain in workforce participation.

The design of this new social housing must reflect changing population needs and demographics. Most of the current public housing stock is made up of older three bedroom houses that are increasingly expensive to maintain. But the majority of people seeking social housing are single people living alone, sole parents with children, and people living with disability. The mismatch between the housing supply and the needs of those seeking an affordable home means that in South Australia for example, one in four public houses are underutilised, while others are overcrowded. Old housing stock also rarely suits the needs of people with disability and elderly Australians.

Given the abject failure of the private market to provide affordable housing, it is vital to work with future tenants to develop modern social and community housing that reflects the needs of those who will live there. The Government must again embrace its responsibility for the design of public infrastructure that supports healthy communities.

#### **Recommendation: Investing in social housing**

Anglicare Australia supports calls from the Everybody's Home campaign for an investment in 300,000 social and Indigenous homes. Coupled with our recommendation on affordable rentals, this would create a total of 500,000 new affordable homes and go a long way to tackling Australia's housing crisis.

### **Renters and poverty in retirement**

Over the last year, Anglicare Australia Network members have witnessed the challenges faced by many older Australians as they retire into poverty. An increasing number of Australians face retirement without enough savings or assets, meaning they will rely entirely on the Age Pension. But with no home of their own and little or no savings, they struggle to get by on the Pension. Anglicare Australia's most recent Rental Affordability Snapshot found that just over one percent of properties were affordable for a single person on the Age Pension. That means that a huge number of retired renters, pensioners especially, are likely to be experiencing housing stress and living in poverty.

These issues particularly affect older women, and can be seen in their increased rates of homelessness. Older single women are one of the fastest growing cohorts of people experiencing homelessness and most of them have never been homeless before. Many women will retire with less because of time taken out of the workforce, lower pay, and the impact of life crises such as family breakdown or domestic violence. All of this can lead to women losing assets and income, making them much more vulnerable and likely to retire into poverty.

Secure, affordable housing becomes even more important after retirement, as older people begin planning the latter part of their lives and begin to need care and support at home. The structure and funding of our aged care system presumes that people own their own home or enjoy living in secure and affordable rental housing, while aged care itself is increasingly focussed on providing that care within the home.

Home ownership is a major factor in providing for comfortable and dignified retirement. Indeed, the Age Pension, the funding of the aged care system, and much of the social security system is predicated upon the assumption of home ownership. These systems will be greatly impacted by changing patterns of home ownership, as more and more people are now retiring as renters while others are retiring with substantial mortgage debt. To date, no work has been done to model that impact. Anglicare Australia believes this work is becoming urgent as a generation of Australians is locked out of home ownership and more people are set to be lifelong renters.

**Recommendation: Modelling changing patterns of home ownership**

Anglicare Australia calls for treasury to conduct research on changing models of home ownership, its future impacts on the social security system, the broader Budget, and the quality of life in retirement for future generations.

## A Better Future for Children and Young People

The transition from adolescence to adulthood – emerging adulthood – is now recognised as a significant stage in the life cycle in developmental, emotional and social terms. Young people leaving out-of-home care (OOHC) face this transition to adulthood without family support and with significant extra barriers such as poor mental health, intellectual and physical disabilities, developmental delays, and the trauma that led to them entering OOHC to begin with. They are further disadvantaged through structural impediments and economic and social policy factors, such as the lack of affordable or appropriate housing and high unemployment.

Stability of care and emotional security during time in care are significant predictors of young people's outcomes. However, residential care does not always meet the needs of vulnerable children and may also exacerbate trauma. The disparities in care-pathways between children in OOHC and those resident in traditional care structures is poignantly highlighted in the abrupt and instituted end of formal state care at the age of 16-18 years. The state, as the effective parent, ceases to provide ongoing financial, social and emotional support as a care-giver. For this reason, for a young person in OOHC, the process of leaving care has commenced well before adulthood. A review of Australian research, including a report by the Victorian Ombudsman, found evidence that some young people had little or no preparation for leaving care, and no leaving-care plan.<sup>43</sup>

By contrast, young people in the general population are now more likely to continue to live with their parents well into their mid-20s, entering and exiting the family home several times as they pursue various personal development opportunities. Driven by the increasing uptake of post-schooling education, the rising cost of housing and the increasing accessibility of travel, at present, almost 50 percent of people aged between 18 and 24 are still living with one or both parents.<sup>44</sup>

Research has consistently shown that the leaving care transition needs to be flexible, gradual and well planned. On this basis, Anglicare Australia members led by Anglicare Victoria have formed a coalition, Homestretch, calling for young people in OOHC to be given the option to remain in care until the age of 21.

A recent cost-benefit commissioned by Anglicare Victoria explored the economic benefits that could flow – both to the individual and to the public – from introducing a program of support for children in all forms of OOHC that gives them the option to extend such care from the age of 18 to the age of 21. The modelling results from the full study show that the benefit to cost ratio of the program is 1.84.<sup>45</sup> In other words, a dollar invested in the program is associated with an expected return of \$1.84 in either savings or increased income.

Based on the overwhelming evidence of benefits to young people and the community more broadly, Anglicare Australia supports moves to extend care to 21 years for those who wish to remain in foster care or kinship care and have the agreement from their carer; or, wish to remain in a supported care environment. This would require Governments to provide support in the form of ongoing carer reimbursements to carers and case management to the young person and resources to access education or employment activity.

Although this is primarily an area of responsibility for State and Territory Governments, the Commonwealth has funding and oversight responsibilities in areas that are directly related to child protection and constitutional responsibility for Indigenous children, who form a significant proportion of children in care. National leadership in this area is necessary to ensure action, and consistency, across State and Territory Governments. The Commonwealth also stands to gain savings.

**Recommendations: Extending out-of-home care to 21**

Anglicare Australia calls on the Federal Government to establish a federally coordinated approach to continued care to 21 years for better outcomes for young people. This would include:

- defining eligibility and criteria principles
- drafting enabling legislation and defining responsibilities for the states and territories
- creating a cost sharing arrangement between the Federal, State and Territory Governments.

## Supporting Aboriginal and Torres Strait Islander children and young people

It has been over twenty years since the release of *Bringing Them Home*, the landmark report into the Stolen Generations. At that time, many Australians were shocked to learn that Aboriginal and Torres Strait Islander children represented 20 percent of children in OOHC. Today, Aboriginal and Torres Strait Islander children make up over one third of all children living in OOHC,<sup>46</sup> and disproportionate representation continues to grow.

The consequences of child removal are profound. Removals devastate families, deepen intergenerational trauma, and can trigger poor life outcomes. In spite of the principles of prevention and early intervention enshrined in federal and state policy frameworks, over 80 percent of funding goes into the out-of-home care system instead of prevention.

If we continue to do what we are currently doing in child protection, the numbers of Aboriginal and Torres Strait Islander children in OOHC will at least treble in the next 20 years, according to the most recent Family Matters report.<sup>47</sup> The rates of over-representation of Aboriginal and Torres Strait Islander children continue to increase across jurisdictions. Not only are we failing to close the gap, we are actively widening the gap.

Anglicare Australia is signatory to the Family Matters campaign, which aims to eliminate the over-representation of Aboriginal and Torres Strait Islander children in out-of-home care by 2040. We echo the campaign's calls to strengthen and support families to reverse the trend of removals, and to work with Aboriginal and Torres Strait Islander communities to ensure children and young people grow up safe and cared for in family, community and culture.

### **Recommendations: Reversing the trend of Aboriginal and Torres Strait Islander child removals**

Anglicare Australia recommends the Government adopt the major actions identified by the Family Matters coalition. This would involve a commitment to:

- develop a national Aboriginal and Torres Strait Islander Children’s Strategy which includes generational targets to eliminate over-representation and address the causes of child removal to improve safety and wellbeing.
- increase efforts to connect Aboriginal and Torres Strait Islander children in OOHC to family and culture, through cultural support planning, family finding, return to country, and kinship care support programs.
- prioritise investment in service delivery by community-controlled organisations in line with self-determination, including through investment targets aligned to need and adopting co-design principles with Aboriginal and Torres Strait Islander communities.

## **A National Commissioner for Aboriginal and Torres Strait Islander children and young people**

The Family Matters Report 2019 has highlighted the urgent need to establish a dedicated National Commissioner for Aboriginal and Torres Strait Islander children and young people. This was further supported by the United Nations Committee on the Rights of the Child, who this year reviewed Australia’s progress to respect, protect and fulfil children’s rights.<sup>48</sup> A Commissioner would provide improved oversight and accountability for systems and services to improve the protection of the rights of Aboriginal and Torres Strait Islander children and young people.

As Family Matters signatories affirmed in a recent position paper,<sup>49</sup> there are at least three key reasons why there is an urgent need and imperative to establish a National Commissioner dedicated to Aboriginal and Torres Strait Islander children and young people.

Firstly, Aboriginal and Torres Strait Islander children and young people experience disproportionately high levels of disadvantage and discrimination. Secondly, Aboriginal and Torres Strait Islander children and young people often fall through the cracks of our federal system. And thirdly, there is growing recognition by state and territory governments of the importance and value of a Commissioner dedicated to Aboriginal and Torres Strait Islander children and young people. Several have made it clear that they would value national leadership.

A dedicated National Commissioner should form part of the Australian Human Rights Commission on equal footing with the existing commissioner roles. The Commissioner should be established in conformity with the United Nations benchmark guidelines for national human rights institutions, known as the ‘Paris Principles.’ To achieve this, the role of the National Commissioner must:

- be established by legislation to ensure its independence and autonomy from government
- be filled by an identified Aboriginal and Torres Strait Islander person with appropriate qualifications, knowledge and experience, appointed through a transparent process
- be mandated with a clear scope and purpose for the role
- be granted appropriate functions and powers to promote systemic change and accountability, this includes powers to conduct inquiries
- be adequately resourced to perform its role effectively.



**Recommendation: Appointing a National Commissioner for Aboriginal and Torres Strait Islander children and young people**

Anglicare Australia calls for the appointment of a dedicated National Commissioner for Aboriginal and Torres Strait Islander children and young people. The Commissioner should be established in conformity with the United Nations benchmark guidelines for national human rights institutions, and form part of the Australian Human Rights Commission on equal footing with the existing commissioner roles.

## Conclusion

The nation is facing major challenges, and so is the Federal Budget. Hundreds of thousands of Australians cannot find an affordable home. Those who are out of work or underemployed are struggling to make ends meet. And many older Australians are retiring into poverty.

Yet in recent years these issues have failed to register in the Budget at all. This is in spite of the fact that, in each of these cases, there is widespread agreement about the problems we face and the solutions we need. And in many of these cases, these analyses have come from the Government itself.

It is clear that more must be done to create jobs and help people participate. There is widespread agreement, including from the Government itself, that changes are needed to the Jobactive Network. It is time for that recognition to translate into proposals on how to build a more person-centred system.

As our submission highlights, Australia's safety net has become a poverty trap. Rates of Newstart have been frozen at dangerously low levels for 25 years. One-off payments and tax cuts will not lift people out of poverty. Instead, raising the rates of these payments is the most powerful step that any government could take to reduce poverty in Australia.

Another key part of our safety net, the National Disability Insurance Scheme, is in need of serious attention. It is simply not working for many of the people it was created to serve. The Government cannot afford to underspend on the Scheme, or use it to fund a surplus.

And finally, there is a major contradiction in how the Federal Government is responding to issues in aged care. Older people should not have to wait for the Royal Commission to issue its final report when there are steps that could be taken now. There is a pressing need to clear home care waiting list, tackle workforce challenges, and build a sustainable funding model for aged care. It's only a matter of time before these issues become too urgent to ignore.

A home, a decent income, and dignity in old age are things that every Australian deserves. Each of these areas is critical to making life better for all Australians. We urge the Government to address these issues in its next Federal Budget, and ensure that 2020 does not become another lost opportunity to take on the issues facing our nation.

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