



Australian Women Against Violence Alliance

Committee Secretary  
Senate Standing Committees on Community Affairs  
PO Box 6100 Parliament House  
Canberra ACT 2600  
Date: 07 March 2019

## Submission to the Senate Inquiry into the Social Security (Administration) Amendment (Income Management and Cashless Welfare) Bill 2019

Thank you for the opportunity to make a submission in response to the Senate Inquiry into the Social Security (Administration) Amendment (Income Management and Cashless Welfare) Bill 2019.

### About Australian Women Against Violence Alliance

Australian Women Against Violence Alliance (AWAVA) is one of the six National Women's Alliances funded by the Australian Government to bring together women's organisations and individuals across Australia to share information, identify issues and contribute to solutions. AWAVA's focus is on responding to and preventing violence against women and their children. AWAVA's role is to ensure that women's voices and particularly marginalised women's voices are heard by Government, and to amplify the work of its member organisations and Friends and Supporters. AWAVA's members include organisations from every State and Territory in Australia, representing domestic and family violence services, sexual assault services, services for women in the sex industry and women's legal services, as well as organisations representing Aboriginal and Torres Strait Islander women, young women, women educators and other groups. AWAVA's contract manager is the Women's Services Network (WESNET).

### General comments

We strongly oppose the expansion of the cashless debit cards (CDC) trial as a welfare management tool. We recommend that the Australian government abandons the cashless debit cards legislation all together.

This submission seeks to look at the proposed legislation through the lens of violence against women. Given the prevalence of violence against women in Australia and its gendered nature where the majority of perpetrators are men and the majority of victims/survivors are women, in this submission we use 'women' instead of 'people' in relation to our recommendations. However, we also believe that regardless of gender, no one should be subjected to such a limiting welfare management as the only solution without addressing existing structural inequalities that impact every person in different ways, yet arise from the intersection of race, the impact of colonisation, class, sexual orientation and gender identity, ethnicity, nationality, religion, dis/ability and age.

### Gender inequality as the main driver of violence against women

It has been well-established that the main driver of violence against women is gender inequality.<sup>1</sup> Gendered drivers of violence against women allow for the condoning violence against women, normalise men's control over the various areas of women's lives, sustain rigid and harmful gender stereotypes and notions of femininity and masculinity and tolerate aggression, sexism and sexual

---

<sup>1</sup> Our Watch, Australia's National Research Organisation for Women's Safety (ANROWS) and VicHealth (2015) Change the story: A shared framework for the primary prevention of violence against women and their children in Australia, Our Watch, Melbourne, Australia.

objectification of women. While alcohol and substance abuse can be reinforcing factors and can increase the severity of violence, they are neither the only nor primary drivers of violence against women.<sup>2</sup> We are concerned that the most recent evaluation conducted in the Goldfields region does not engage with this body of evidence and makes concerning assumptions both about the drivers of violence against women and the rates of its reduction.

*Change the Story: a Shared Framework for the Primary Prevention of Violence Against Women* by Our Watch is a nationally accepted framework that outlines the good practice principles of the violence prevention. It is important that collective and comprehensive efforts to address violence against women in Australia are underpinned by existing evidence base and good practice responses. In this framework, alcohol is understood as a reinforcing factor rather than a primary driver of violence against women. It is important that policy and evaluation approaches do not inadvertently undermine the progress in this area by focusing unduly on factors such as alcohol.

There are also frameworks developed for the evaluation of the progress in addressing violence against women. *Counting on Change*, another resource developed by Our Watch, sets out key elements of monitoring of prevention of violence against women as well as progress, medium and long-term measures. The reduction in alcohol consumption is one measure but not the only one. However, the evaluation report of the CDC trial in the Goldfields region is presented in a way that may be misleading in this regard. The report concludes that the introduction of CDC had positive impact including through the reduction of family violence. The claim is made with an assumption of a direct correlation between alcohol consumption and rates of family violence and without any proper measurement in place for the latter.

We recognise that work needs to be done to reduce alcohol consumption and substance abuse, however this work can neither be done through a 'one size fits all' approach nor through punitive welfare measures.

### The right of women to escape violent relationships

We strongly believe, and it is enshrined in both domestic and international human rights law, that all women have a fundamental right to live free from violence. This also means being able to leave violent relationships and achieve their own economic independence. Having only 20% of a social security payment untagged to a particular type of an expense and being available for a cash withdrawal significantly limits the ability to do so. If a woman has children, this available 20% may be even further reduced considering all necessary school and other children related expenses that cannot be paid via direct debit. Cashless debit cards may therefore significantly limit women's ability to leave violent relationships.

Limited income which is further reduced by the CDC not only limits women's ability to leave violence, but also can force women back into violent relationship. Under financial hardship, women may return to perpetrators not having other options for their financial security. In addition to abandoning this legislation, we call on the government to increase social security payments by \$75 a week.<sup>3</sup>

---

<sup>2</sup> Ibid., p. 8

<sup>3</sup> ACOSS [https://www.acoss.org.au/media-releases/?media\\_release=from-kerryn-to-derryn-bob-to-bandt-entire-lower-house-crossbench-and-key-senate-crossbenchers-support-increase-to-newstart](https://www.acoss.org.au/media-releases/?media_release=from-kerryn-to-derryn-bob-to-bandt-entire-lower-house-crossbench-and-key-senate-crossbenchers-support-increase-to-newstart) ; Social Services Legislation Amendment (Ending the Poverty Trap) Bill 2018 [https://www.aph.gov.au/Parliamentary\\_Business/Bills\\_Legislation/Bills\\_Search\\_Results/Result?bld=s1144](https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=s1144); Deloitte Access Economic (2018) for ACOSS, Analysis of the impact for raising benefit rates, available online at: <https://www.acoss.org.au/wp-content/uploads/2018/09/DAE-Analysis-of-the-impact-of-raising-benefit-rates-FINAL-4-September-...-1.pdf>

We are also concerned about an ability for women to escape violent relationships and reallocate outside the CDC trial area and how this will impact the continuity of payments as well as facilitate the exit from the trial. The list of exemptions at it stands at present does not foresee any exemptions for women experiencing family violence. More considerations must be in place to ensure that women are not forced to stay in violent relationships while participating to the CDC trial.

### Addressing the issue in its complexity

Achieving economic security in particular for women cannot be done solely through restrictive and punitive welfare measures. Actions must be taken to ensure increase in employment opportunities, reforms must be in place to reduce the costs of child care and increase access to affordable housing. More support services including specialist women's services need to be sufficiently resourced to assist women. It is important that financial counselling and education, mental health services, alcohol and drugs programs and domestic and family violence services are available. It is vital that necessary changes are co-designed with communities and with strong participation of women and not imposed on them.

In conclusion, AWAVA is calling on the Australian government to abandon the cashless debit card income management legislation. There is no evidence to suggest any positive outcomes from the compulsory punitive welfare policies. The Auditor General concluded that in the absence of effective evaluation and monitoring mechanism, it is difficult to conclude whether any positive impacts or reduction of social harm has occurred.<sup>4</sup> We call on the government to ensure that every member of the community is treated equally and with dignity and respect that they deserve.

Once again we thank you for the opportunity to provide input to this inquiry. If you would like to discuss the contents of the submission further, please contact Dr Merrindahl Andrew, AWAVA Program Manager, using the details below.

Dr Merrindahl Andrew  
Program Manager  
Australian Women Against Violence Alliance  
[www.awava.org.au](http://www.awava.org.au)

---

<sup>4</sup> Auditor-General Report No.1 2018–1 The Implementation and Performance of the Cashless Debit Card Trial