



Purpose, Intent and Adequacy of the Disability Support Pension

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Statement of Recognition

The Salvation Army acknowledges the Traditional Owners of the lands and waters throughout Australia.

We pay our respect to Elders and acknowledge their continuing relationship to this land and the ongoing living cultures of Aboriginal and Torres Strait Islander peoples across Australia.

We also acknowledge future aspirations of all First Nations peoples. Through respectful relationships we will work for the mutual flourishing of Aboriginal and Torres Strait Islander Australians and non-Indigenous Australians.

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.





About The Salvation Army

The Salvation Army is an international Christian movement with a presence in 134 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country. Programs include:

- Financial inclusion, including emergency relief
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further Information

The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from Major Paul Hateley, National Head of Government Relations, on 0413 830 201 or at government.relations@salvationarmy.org.au.



Introduction

The Salvation Army thanks the Senate Community Affairs References Committee for the opportunity to contribute to the inquiry upon the purpose, intent and adequacy of the Disability Support Pension (**DSP**).

Our experience walking alongside Australians in their hour of need is that the DSP forms a critical pillar in the lives of Australians who are unable to work due to disability, injury or other medical reasons. Unfortunately, the current system prevents too many otherwise eligible Australians from accessing the payment due to unforeseen and unintended barriers to entry. Technological, linguistic, medical and financial barriers should not prevent eligible Australians from accessing social security and the dignity of self-sufficiency.

In the experience of The Salvation Army, paid employment is the goal of the overwhelming majority of Australians. Not only is a job a source of secure income, but also the mental and emotional stimulation, and generates a sense of contribution to society for employees. That is why as a government-funded Disability Employment Service (**DES**) provider, The Salvation Army aims to place job seekers in roles that best suit their strengths and abilities and to maximise employers' capacity to engage and retain employees.

According to the Social Security Guide, the Disability Support Pension is “an income support payment for people who are unable to work due to permanent physical, intellectual or psychiatric impairment”. There is scope for the government to take a more holistic approach to the system of supports available for people with disability.

Through an improved DSP application process, recovery-oriented support for people whose condition is not determined to be ‘fully diagnosed, treated and stabilised’, wraparound support to help people access and maintain meaningful employment, and community involvement, The Salvation Army sees a world where people with disability are supported and recognised as valued members of our community.



The Salvation Army's Moneycare service

Moneycare is The Salvation Army's financial wellbeing and capability service. It has been operating for over 30 years and has helped thousands of people experiencing, or at risk of experiencing, financial and social exclusion. We have a national footprint of about 85 sites across Australia.

Through Moneycare, we deliver a range of free and confidential services, including financial counselling, financial capability support, financial literacy and capability workshops, and microfinance. These services build on The Salvation Army values of empathy and dignity, with an emphasis on building trusting relationships with people accessing our services.

Moneycare services support people by addressing their immediate financial crisis situation and helping them build long term capabilities and resilience in managing financial hardship.

The Salvation Army's Doorways service

Doorways provides emergency relief assistance for those in crisis and helps them meet immediate needs, from unexpected bills to food vouchers. Doorways aims to support people as they seek to make changes in their lives. We believe everyone has the capacity to change and Doorways caseworkers walk alongside people as they develop plans to achieve their goals.

Doorways works to identify and solve the issues contributing to long-term economic hardship. To do this, Doorways also works closely with other Salvation Army programs, including Moneycare, to assist individuals to regain control of their finances. We provide early education and prevention strategies for people who may be at risk of financial hardship.

The Salvation Army's Employment Plus service

The Salvation Army's Employment Service, Employment Plus, works to help people find work that supports their wellbeing and benefits the community. Over 20 years, Employment Plus has placed more than 500 000 people in jobs across 200 000 businesses. Our services has also provided job seekers, particularly people experiencing complex barriers to employment, with specialised training, work experience, allied health support and connection with local employers to help them secure meaningful employment.

Employment Plus is also a Disability Employment Service, getting to know applicants, their skills and passions, and using this grounding to find the right opportunity for them. Our Disability Employment Service also continues to support applicants after their placement, helping them to settle into a role and maximise their workplace fulfilment.



Barriers to Access

Cultural and linguistic, technological, medical and financial barriers to access either lock out, isolate or discourage too many eligible Australians from engaging with the DSP, and inhibit the payment fulfilling its purpose of supporting people who are genuinely unable to work due to a 'permanent physical, intellectual or psychiatric condition'.

The difficulty and complexity associated with the DSP application process means that it is almost impossible for people with disability to access the payment without additional support. The Salvation Army's Moneycare and Doorways teams often find themselves providing a case management role to support people with disability to navigate the process. A few organisations, such as Social Security Rights Victoria, have developed resources to assist applicants and advocates in understanding and traversing the DSP application and assessment process.¹ Some legal service providers and private solicitors even offer community service organisations training and support to better understand the legislation and assessment process. This in turn helps organisations ensure that applicants provide the necessary information the first time around and are able to access the appropriate level of social security support.

Technological

The Salvation Army is aware of the government's ongoing campaign to improve the user experience of the Services Australia online and helpline infrastructure. Yet the experience of both people who approach The Salvation Army for support and the staff in our Moneycare financial counselling service and Doorways emergency relief service is that the online and phone systems of Centrelink are difficult to navigate. Our community members also find it more difficult to understand what is required of them and to supply the appropriate information through these methods than a personal and face-to-face interaction.

The shift away from face-to-face services toward online and phone communication isolates many participants from the Centrelink staff who are trying to enforce standards, as well as ensure the best outcome for applicants. Older Australians, people living in rural and regional Australia and people on low incomes also experience technological barriers to accessing the DSP, as well as other Centrelink resources, due to unfamiliarity with, or limited access to, the internet. The process is also almost impossible to be performed on a mobile phone, which again isolates those who do not have a personal computer.

Critically, there is a contrast between the experience of people accessing the DSP from that of older Australians transitioning to the Age Pension. Centrelink Financial Information Service (**FIS**) officers provide a highly effective, experienced and personalised support for older Australians preparing for retirement. The same level of support and case management is not available for people seeking to

¹ <https://www.ssr.org.au/toolkits/>



access the DSP, who are forced to navigate significantly higher levels of bureaucracy on their own. This gap in case management support is currently being filled by the community and legal sectors.

Linguistic

Culturally and linguistically diverse (**CALD**) Australians are also presented with additional barriers to accessing the DSP.

The Salvation Army appreciates the need for highly technical language in certain circumstances but recommends that an 'Easy English' version of key documents be made available. Our experience is that the complex language used and the complicated qualification process have a chilling effect, discouraging applicants who are genuinely eligible.

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“It is a sad state of affairs that we need to seek legal advice for a person to get a government benefit.”

– A Salvation Army Moneycare financial counsellor

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Financial

The Salvation Army recognises the need for a suitably qualified medical professional to verify an applicant's physical, intellectual and/or psychiatric condition as part of the DSP assessment process. Our experience is that the current process presents too high of a financial burden on potential applicants and prevents too many Australians from accessing the payment.

Medical reports and letters of confirmation are particularly difficult to access in regional and rural areas, where a shortage of general and specialist medical professionals prevents people from being able to afford appointments, or means they have to wait a long time to see an appropriate clinician. For example, the requirement for applicants with a mental health condition to have a report from a clinical psychologist has been known to draw out the process by 12 months and add significant costs.

The Salvation Army has supported community members who had to travel multiple times to see their nearest specialist before they had sufficient documentation to access the DSP. We have known of community members being charged as much as \$10 per page for a printout of their lengthy medical report.

Even dedicated physicians can be unaware of the precise wording required and letters that are intended to verify eligibility end up falling short of the criteria sought by assessors. It is unreasonable to expect medical professionals to devote time to researching the correct wording and a waste of their time to reword their findings multiple times before it is accepted.



Jane's Story

Jane* suffers from a detached retina and inoperable cataracts, which prevent her from being able to read or write. Due to a technological change at her workplace, Jane was made redundant from her role as a disability support provider after 22 years at the same employer.

For the past 2 years Jane has been on the JobSeeker Payment and trying to find employment with her disability is extremely difficult.

Jane applied for the DSP but was declined due to insufficient evidence. Her income level means that she cannot meet the costs of obtaining the required medical report. The Salvation Army is helping Jane with funds to access her report

* Not her real name.



The Value of Employment

The service delivery experience of The Salvation Army is that paid employment has benefits far beyond remuneration. A job has both personal and economic benefits for the employee and the broader population. A job provides an individual with structure and routine in their daily life, a sense of purpose and confidence, and many people derive a connection to their community and society through their employment. These have significant benefits to the mental health of an individual.

The majority of people experiencing unemployment who approach The Salvation Army express their desire to be able to get a job and frustration with the difficulty they experience finding employment. Isolation, social stigma and a lack of mental stimulation can lead to mental ill-health, which in turn can further diminish their employability.

Our employment service, Employment Plus, are highly skilled at bringing together people seeking jobs with employers. Our Employment Plus team helps applicants design resumes and cover letters to give applicants the best chance of gaining an interview. They provide coaching, and even clothing, to applicants to maximise their chances of success in an interview. Employment Plus also works with applicants to develop a job search plan based on the local jobs market, including assisting with upskilling through our Training Plus program. There is even counselling available for those who require more personal support.

The Salvation Army is also a Disability Employment Service (**DES**) provider, working with people with disability to help them secure and maintain employment. Our person-centred approach means that DES staff focus on the community member and work to match them with a job that is suited to them and their abilities. We also work with employers to ensure that workplaces are equipped to support employees' needs. This includes assisting employers with the purchase of necessary equipment, workplace modification and training. Post-placement support by our DES staff further helps to ensure that the position continues to be workable in the long term.

Tessa's Story

Tessa* has a disability and was referred to The Salvation Army's Disability Employment Service. In getting to know Tessa and her skills, the DES officer discovered that she had a passion for flowers and dreamt of becoming a florist.

The DES worked with a local florist to secure a position for Tessa that would suit her needs and continued to support them after she had started work.

Tessa has continued to grow into her role and is becoming more confident talking to customers and helping them get exactly what they are looking for. When reflecting on her new job, Tessa said, "Knowing that the people I work with really appreciate me and are happy with who I am; I couldn't really ask for any better".

* Not her real name.



Interaction with the JobSeeker Payment

People with disability who are experiencing unemployment but have not been assessed as meeting the qualifications for the DSP are forced to rely on the JobSeeker Payment.

The Salvation Army has long argued that the rate of the JobSeeker Payment is inadequate, forces people to live below the poverty line, and can trap people in long-term unemployment. We continue to advocate for an increase in the base rate of the JobSeeker Payment.² However, it is clear that the purpose and philosophy behind the DSP is vastly different to that of the JobSeeker Payment.

Permanence vs. Recovery

The JobSeeker Payment, as the name would suggest, is designed to be a temporary safety net payment for people seeking paid employment and transitioning through temporary joblessness. Attached to this are mutual obligations that a recipient must fulfil to remain eligible for the payment. Principally, the obligation to search for work measured through a prescribed number of job searches per month and the repercussions for failing to accept a position in a suitable form of employment. While it is possible to gain a medical exemption for a short period, mutual obligations reinforce the concept that JobSeeker is a payment exclusively for people who are temporarily out of a job.

On the other hand, the DSP is a pension payment. This means it serves the role of supporting people with a permanent or long-term barrier to employment, in this case, based on a physical or mental condition. Although there are numerous qualifications for the payment, permanence, or a prolonged condition, is a significant qualifier.

Ideally there would be very little interplay between these two payment systems, as the recipients they are intended to support are so different. Sadly this does not reflect reality.

The barriers of entry to the DSP discussed above mean many Australians with disability, particularly those with mental ill-health and other unseen conditions, are unable to access the DSP, which was designed to support them. Instead they must rely upon the much lower rate and meet the mutual obligations associated with the JobSeeker Payment.

Need for a Recovery Payment

Due to the barriers to entry and the differing purposes of the DSP and the JobSeeker Payment, The Salvation Army's firm view is that an additional category of income support payment should be established for Australians experiencing mental ill-health or a significant but not permanent condition that prevents them from working.

² The Salvation Army Australia. (2019). *Welfare – Putting a Price on Dignity* (Submission to the Senate Standing Committee on Community Affairs Inquiry into the Adequacy of Newstart and related payments and alternative mechanisms to determine the level of income support payments in Australia). <https://www.aph.gov.au/DocumentStore.ashx?id=19679169-e8cc-46c3-9169-81629f1f0245&subId=670682>



Australians with a severe mental health condition that prevents their employment for an uncertain period of time are not eligible to access the DSP due to that payment's focus on permanence. The current best treatment practice for mental illness is a recovery-oriented model. This acknowledges that recovery is possible and that the participant must lead this recovery. This patient-led, recovery-focused model of care has become the dominant model of care within the field,³ but it requires time and a supportive environment. What is not constructive to this recovery is the job search requirement under the JobSeeker Payment simply to remain eligible for a payment that forces them to live below the poverty line. There is some flexibility in these requirements but a requirement to apply for jobs when not yet able to maintain a job and the ever-present risk of having payments suspended causes undue stress. It also diverts focus from getting well.

Based on our experience providing support to people experiencing mental ill-health, The Salvation Army's view is that a more appropriate payment, oriented to recovery, would better ensure that those Australians who are experiencing mental ill-health are able to focus upon their journey to recovery rather than on complying with onerous mutual obligations. The finer details would need to be developed in close consultation with people who have lived experience of both mental ill-health and unemployment. Its object would be to allow an unemployed person experiencing mental ill-health to prioritise their own recovery and provide for them to gradually return to work as they become able.

³ Lyon, S. (2020, February 20). The Recovery Model. *Verywell Mind*. <https://www.verywellmind.com/what-is-the-recovery-model-2509979>



Value of Volunteering

Although paid employment clearly has a significant benefits for people with disability, it is not always possible for many people to find suitable employment which is complementary to their skills and interests. It is not, however, impossible for people in this category to contribute to their community and participate.

Volunteer opportunities are a chance for people with disability who want to be able to give back. Studies have found that volunteering can provide participants with a sense of belonging, increased happiness and empathy and mental and physical health benefits often called a 'helper's high'.⁴

Volunteer opportunities are diverse and can include working for an organisation's management committee, community sport team coaching, fundraising, food preparation and delivery, and even gardening work. Volunteering provides both experience which can be transferred into employment opportunities, but also helps to build confidence.

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“It means so much to community members knowing that they [the volunteer] choose to be there, that they care, that they're there to help and that's their purpose. It speaks volumes.”

– A Salvation Army Doorways Caseworker

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From the experience of The Salvation Army, volunteers also enrich our work. As a volunteer providing assistance to a community member, our clients experience a deeper connection as they know the volunteer is there purely to help them, rather than viewing their problem as work.

The Salvation Army is passionate about improving our own volunteer engagement streams to facilitate the engagement of people with disability. Increasing the diversity of our teams to include volunteers with different abilities has benefit for individual team members, the team as a whole, as well as our community support capacity. We are working toward ensuring our internal policies and resources facilitate volunteers with disability or other conditions being involved in our community outreach.

⁴ University of Sydney. (2017, May 3). 7 surprising benefits of volunteering. Retrieved from <https://www.sydney.edu.au/news-opinion/news/2017/05/03/7-surprising-benefits-of-volunteering-.html>.



Todd's Story

Todd* is an 18-year-old man with autism. After finishing school and struggling to find a job, Todd began volunteering in his local Salvation Army centre. Cooking for their weekly Come And Meet Each Other (**CAMEO**) meal, Todd has been able to give back, and really enjoys being part of the team.

The local Salvation Army officers said, "We love having him in the kitchen, and it is great he is learning to work independently as part of the team."

* Not his real name.



Avenues for Improvement

Access

There is a desperate need for a more streamlined application process for the DSP, particularly in ensuring that the required medical information is conveyed efficiently.

We have seen too many instances where medical professionals and the Centrelink system fail to communicate the necessary information to one another. This leaves vulnerable people without access to the DSP, or at best, causes delays to their receiving the payment. The government could develop a pro-forma DSP medical verification document that clearly expresses the criteria and necessary information. This would both show medical professionals the type of information needed to fulfil the eligibility requirements, and allow them to efficiently indicate the exact condition of the applicant. This would also save the time of Centrelink assessors, as the information and eligibility criteria could be more speedily processed.

Recommendations

- The Committee recommends the Commonwealth Government develop pro-forma documentation to assist medical professionals assess the eligibility of DSP applicants.
- The Committee recommends the Commonwealth Government review all Centrelink documentation and train staff to provide a trauma informed approach to communication.

It is vital that the Commonwealth Government address the technological and linguistic barriers to access. Although community service organisations like The Salvation Army do our best to help people with disability navigate the DSP application process, internal Centrelink procedures should be designed to ensure that the process is accessible to every person who is eligible for the payment, without the need for external support.

The Financial Information Service is highly effective at providing guidance and support for people entering retirement. A similar service could assist people applying for the DSP by cutting through the alienating technological and jargonistic barriers. This could take the form of a direct case management approach where Centrelink caseworkers work with applicants to discuss available options, guiding them through the necessary documentation and supporting them where required to obtain the required medical evidence.

Recommendation

- The Committee recommends the Commonwealth Government extend the Financial Information Service (or establish a similar service) to guide people through the application process for the DSP.



Wraparound Support

As a Jobactive and DES provider, The Salvation Army knows that all job seekers need more than just employment services to ensure they are able to succeed in their goal of securing and maintaining a job. As one of the largest organisations of social services in Australia, The Salvation Army is able to provide a number of wraparound supports to our DES participants.

By connecting community members with our housing, emergency relief, alcohol and other drug, and financial counselling support services, it is more likely they will receive the support necessary to ensure they are able to maintain their employment. We also continue to provide support and follow-up to community members we have supported into employment through DES.

Maximising interconnectivity between community services, including referrals between housing, financial, health, emergency relief and other services, recognises the multifaceted way in which disability and unemployment affect a person.

Recommendation

- The Committee recommends the Commonwealth Government ensures that wraparound services and support play a key role in Commonwealth Government-funded services for people with disabilities and other conditions.

Stigma

It is also well-known that there is a stigma surrounding mental ill-health in Australia. Too many Australians fear the perception of mental illness and this prevents many from seeking help. The unseen nature of mental illness makes it possible for a person to suffer in silence and allows an emerging issue to escalate.

From our experience some employees with a mental health condition feel they are unable to raise ways that their employer could better support them. For example, additional flexibility in work hours can help a person experiencing mental ill-health without impacting their overall work productivity. Yet fear of judgement prevents these conversations taking place and instead of alleviating the stress, can lead to poorer mental health.

“He would rather keep working, it helps his mental health. It is just getting harder and harder to work in the tight structure of employment. He cannot do it and is heading for a breakdown.”

– A Salvation Army Doorways Caseworker



It is important that employers value their employees and their health, and provide opportunities for employees experiencing temporary mental ill-health, like any other illness, to recover. Flexibility and understanding will support mental health and allow for continued contributions from employees.

Recommendation

- The Committee recommends the Commonwealth Government continue to work to reduce the stigma of mental ill-health.
- The Committee recommends the Commonwealth Government investigate new methods to encourage flexible working arrangements to support people with mental ill-health.

Volunteer Opportunities

As volunteering presents provides similar engagement and stimulation to employment, along with broader benefits to the community, it is upon community organisations and the government to work together to develop opportunities for people with disability to take part in volunteer activities.

The Salvation Army agrees with Volunteering Australia's advocacy for a national volunteering strategy to be developed, complementing those which have been developed by states and territories.⁵ This strategy is necessary to better understand the barriers presented to volunteers with disability and organisations. From this national framework, we can develop methods to maximise the opportunities and positive experience of people with disability engaging in voluntary community contribution.

Recommendation

- The Committee recommends the Commonwealth Government work with community service organisations to develop a national volunteering strategy, including that the DSP does not disincentivise volunteering, to maximise the opportunities for volunteer participation of people with disabilities and other conditions.

Recovery-Oriented Social Security

To help facilitate the return to work for people recovering from disability or ill-health, there must be a support payment between the DSP and JobSeeker.

As discussed above, the high barriers to entry to the DSP and its philosophy of permanence make it ill-suited for people who are recovering from conditions and have an uncertain period of recovery. Those experiencing mental ill-health, but also significant injuries like those suffered in a car

⁵ Volunteering Australia (May 2021) – Submission to the consultation on the National Disability Employment Strategy



accident, whose condition cannot be described as fully treated, fully stabilised, or permanent, deserve to receive financial support throughout their return to full health.

People suffering from severe and diagnosable mental illness would particularly benefit from a recovery-oriented payment that gradually reintroduces mutual obligations and allows for a steady and measured return to the labour force. In consultation with an applicant's physician, the recovery payment could tie in with their mental health journey and taper to match their improved health.

Recommendations

- The Committee recommends the Commonwealth Government develop an improved income support mechanism to support the recovery of those with mental ill-health experiencing unemployment, as outlined in chapter 19 of the Productivity Commission inquiry into Mental Health report.⁶
- The Committee recommends the Commonwealth Government, in consultation with people with lived experience, introduce a new category of income support aimed at providing recovery-oriented support in accordance with current best practice.

⁶ Productivity Commission. (2020) *Mental Health*, Report no. 95, Canberra
<https://www.pc.gov.au/inquiries/completed/mental-health/report>



Conclusion

The Salvation Army thanks the Committee for the opportunity to provide our feedback on the purpose, intent and adequacy of the DSP and to voice the experience of our community members who interact with the DSP process.

Overwhelmingly, our experience is that the DSP is a critical support for Australians with disability and other serious health conditions. However, there are significant barriers to entry which deter too many eligible applicants. Linguistic, technological and financial barriers force too many to survive on the JobSeeker payment, which is poorly suited to their needs. Improvements of access, including a simplified application process, and greater face to face support from Centrelink staff would lessen these barriers to access.

Whether it be through employment or volunteering in the community, it is our belief that the goal of the DSP, and other social supports, to ensure that disability is not a barrier to participation. Transitioning from ill-health, particularly mental ill-health, into employment can be tough and the mutual obligations of JobSeeker and not always conducive to healing. A new category of social security payment focused on recovery, for those with significant illness which prevents them working, but who are on a journey to health would allow people with serious health concerns to focus upon getting well.

Beyond the DSP itself, The Salvation Army believes that wrap around support for people with disability to remain employed or gain employment would help to ensure disability is not a barrier to workforce participation, and the social, economic and mental benefits associated with employment. Similarly, community engagement and participation through volunteering roles is another critical way in which those with disability can gain routine, connection and experience. It is important that the government and community organisations, including The Salvation Army continue to work to expand volunteer opportunities for people with disability.