



Committee Secretary
Senate Education and Employment Committees
PO BOX 6100
Parliament House
Canberra ACT 2600

Re: Social Security Legislation Amendment (Further Strengthening Job Seeker Compliance) Bill 2015

Carers Australia welcomes the opportunity to comment on the Social Security Legislation Amendment (Further Strengthening Job Seeker Compliance) Bill 2015.

Carers Australia is the national peak body representing the diversity of Australians who provide unpaid care and support to family members and friends with a disability, mental illness, chronic condition, terminal illness, drug or alcohol problem, or those who are frail aged.

Carers Australia notes that the necessarily strict eligibility requirements for Carer Payment mean that there are many individuals with significant caring responsibilities who are in receipt of other income support payments that would be affected by this Bill, including Newstart Allowance and Youth Allowance (for young carers who are not apprentices or full-time students).¹

In considering this Bill, Carers Australia urges that appropriate and adequate safeguards are in place to accommodate income support recipients with unpaid caring responsibilities, particularly young carers who are seeking to enter the workforce for the first time. Specifically, we recommend that:

- Consideration be given to the impact that unpaid caring responsibilities may have on the ability of an individual to meet participation requirements such as attending interviews with employment providers, job search activities or Work for the Dole.
- Adequate allowance is given to unpaid carers who may have unforeseeable caring emergencies which mean they are unable to attend a mandatory appointment. Giving prior notice of this may not always be possible and carers should not be unfairly penalised.

¹ In 2009, an estimated 17,887 carers were in receipt of Newstart Allowance, using data from Wave 9 of HILDA. Carers Australia 2012, '*Submission Inquiry into the adequacy of the allowance payment system for jobseekers and others, the appropriateness of the allowance payment system as a support into work and the impact of the changing nature of the labour market*', p.10

- When determining whether a job seeker has failed to accept an offer of 'suitable employment' and is therefore liable for penalty, that consideration be given to the nature and intensity of any caring role and how this may affect the type of employment they are reasonably able to accept. Carers should not be unfairly penalised for failing to accept an offer of employment that prevents them from continuing to fulfil their caring responsibilities.
- Determinations of what constitutes 'unreasonable commuting' should include consideration of the job seeker's need to travel to the care recipient's place of residence.
- New compliance measures for welfare recipients should not unfairly penalise recipients for non-compliance that is not wilful.
- Any decisions to remove income support should be made with full consideration of a job seeker's circumstances, including any caring responsibilities.

For information contact:

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Yours sincerely

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Chief Executive Officer

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