

# Australian Labor Party Senators' Dissenting Report

1.1 Labor Senators on this committee reject the recommendation of the majority report.

1.2 The measures proposed in this Bill will further disadvantage vulnerable Australians and contribute to growing inequality.

1.3 The committee has heard overwhelming evidence from medical specialists, community sector leaders and representatives of Job Service providers that the implementation of measures in this Bill will have serious, negative consequences for many Australians.

## Schedule 3: Cessation of Wife Pension

1.4 The committee heard that the Government's proposed transitional arrangements for existing recipients of the Wife Pension are unfair.

1.5 The Wife Pension is currently paid to female partners of Age and Disability Support pensioners who are not eligible for a pension in their own right. The payment closed to new entrants in 1995, and is not activity tested.

1.6 This Schedule would see 2 900 women transfer onto Jobseeker Payment from 20 March 2020. These will be women below pension age who do not meet the activity tests for Carer Payment.

1.7 Transitional arrangements would apply that mean that they will continue to receive the pension rate of payment rather than the lower Jobseeker Payment rate, but its indexation would cease, meaning they would be worse off in real terms over time.

1.8 The Australian Council of Social Service said that recipients of these payments 'will suffer an effective loss.'<sup>1</sup>

1.9 This Schedule will leave a further 200 recipients who are living overseas without any form of support.

1.10 The National Social Security Rights Network have argued that grandfathering arrangements should be extended to these participants to enable them to continue receiving payment, and that a failure to do so is fundamentally a change to the rules of portability.<sup>2</sup>

1.11 The National Social Security Rights Network write that:

The general principle in social security law is that people already overseas are protected from changes to portability rules because they have already committed to living overseas. Schedule 2 of this Bill grandfathers Widow B Pension recipients from changes to the applicable portability rules in this

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1 Ms Charmaine Crowe, Senior Policy and Advocacy Officer, Australian Council of Social Service, *Committee Hansard*, 30 August 2017, p. 3.

2 National Social Services Rights Network, *Submission 18*, p. 5.

way. In our view, the same approach should be taken for this small number of Wife Pension recipients.<sup>3</sup>

1.12 The Australian Council of Social Service also called for grandfathering provisions to be applied to this group of existing Wife Pension recipients, warning that a failure to do so would place them in 'severe financial deprivation.'<sup>4</sup>

1.13 Bereavement Allowance is a short term payment for people whose partner has died. It is paid for a maximum of 14 weeks at the rate of the Age Pension, and subject to the same income and assets test. For a pregnant woman who has lost her partner the allowance is paid for 14 weeks or the duration of her pregnancy, whichever is longer.

1.14 Schedule 4 of this Bill will replace Bereavement Allowance as it currently exists with short term access to the Jobseeker Allowance, paid at the lower rate and with a more stringent means test from 20 March 2020.

1.15 While the schedule provides transitional arrangements that mean that bereaved people receiving the allowance on 20 March will be no worse off, future recipients will receive only the rate of Jobseeker Payment which is \$535 per fortnight, the same as Newstart Allowance.

1.16 This means that a bereaved person in need of income support will receive \$1 300 less over the 14 week period than they do currently.

1.17 The committee heard that grieving, low income Australians would be worse off as a result of the Bereavement Allowance being rolled in to the new Jobseeker Payment.

1.18 According to the Australian Council of Social Service, a grieving person would be at least \$1 300 worse off over a period of 14 weeks if this change proceeds.<sup>5</sup>

1.19 The National Social Security Rights Network submitted that reduced support for people with low incomes while they are bereaved should not be supported, as the financial stresses that this causes are significant.<sup>6</sup>

1.20 The committee heard that:

It's difficult to get a funeral for under \$5,000 or \$6,000...Most of the people in those circumstances are generally on a low income, and it's very difficult financially to cover the cost of a funeral and other associated expenses. Cutting the bereavement allowance will place those people into further hardship and make even more difficult the period of time following a bereavement.<sup>7</sup>

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3 National Social Services Rights Network, *Submission 18*, p. 5.

4 Australian Council of Social Service, *Submission 50*, p. 4.

5 Australian Council of Social Service, *Submission 50*, p. 5.

6 National Social Security Rights Network, *Submission 18*, p. 6.

7 Ms Crowe, *Committee Hansard*, 30 August 2017, p. 4.

1.21 The Australian Council of Social Service have indicated that pregnant women whose partner passes away will be the most impacted by this change, as they can continue to be paid the Bereavement Allowance until the birth of their child, even where this means they receive the payment for longer than 14 weeks.<sup>8</sup>

1.22 Labor Senators on this committee reject the Government's attempt to make life more difficult for vulnerable Australians who are trying to come to terms with the death of their partner.

### **Schedule 9: Changes to activity tests for persons aged 55 – 59**

1.23 Schedule 9 removes the ability of Newstart and some Special Benefit recipients between ages 55 and 59 from fulfilling the activity test by volunteering for 30 hours per fortnight.

1.24 Recipients would need to fulfil 30 hours per fortnight of activity with voluntary work and suitable paid work—15 of the 30 hours must be paid work.

1.25 However the Government has not provided any additional concrete support to help them overcome the significant barriers they face.

1.26 Overwhelming evidence provided to the committee on this measure was that mature jobseekers face significant adversity such as ageism when trying to enter the work force.

1.27 The Department of Employment told the committee that the average amount of time that jobseekers search for work is around 40 weeks, but that workers aged 55–59 take approximately 73 weeks to find work.<sup>9</sup>

1.28 The committee heard that it is 'well established that people over 55 are particularly disadvantaged in the labour market. One third of people receiving Newstart payments are aged 50 and over.'<sup>10</sup>

1.29 Volunteering Australia told the committee that:

...it is short sighted to change the Activity Requirements without first addressing the causes for unemployment in persons aged 55 to 59, and the pervasive age discrimination that this group experiences.<sup>11</sup>

1.30 Anglicare told the committee that:

The simple fact is that there are not enough jobs for the number of jobseekers in Australia. It is particularly difficult for older people to find work due to discrimination and often a lack of contemporary skills. As Anglicare Australia's Jobs Availability Snapshot shows, the shortage of

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8 Ms Crowe, *Committee Hansard*, 30 August 2017, p. 4.

9 Mr Martin Hehir, Deputy Secretary, Employment, Department of Employment, *Committee Hansard*, 30 August 2017, p. 54.

10 Australian Council of Social Service, *Submission 50*, p. 6.

11 Volunteering Australia, *Submission 12*, p. 3.

positions available for low-skilled job seekers runs at six job seekers for every position advertised.<sup>12</sup>

1.31 The Australian Association of Social Workers told the committee that any policy changes should 'take account of this age-based discrimination, which is beyond the control of the individuals affected.'<sup>13</sup>

1.32 In addition to the increased difficulties that jobseekers aged 55–59 would face as a result of this change, the committee also heard from experts in the volunteering sector who told the committee that they are also very worried the changes may reduce the number of people volunteering in Australia.

1.33 Volunteering Australia raised concern in their submission to the inquiry that 'the tightening of the activity test could move people away from volunteering positions, which will have a profound impact on the volunteering sector.'<sup>14</sup>

1.34 Anglicare explained to the committee that,

Volunteers aged 55-64 are the single biggest cohort of volunteers nationally. Forcing people to desist from volunteering and seek jobs that simply aren't there will have a negative impact on their self-worth, and hurt many valuable and treasured community organisations that rely on volunteers to operate.<sup>15</sup>

### **Schedule 10: Start day for some participation payments**

1.35 The RapidConnect program requires jobseekers claiming income support to promptly access an employment services provider.

1.36 This Schedule changes the start date from which people can begin to receive income support for those participating in RapidConnect.

1.37 At the moment, a person can receive payment from the date they make their claim or the first day after the end of any waiting period they must serve – including the ordinary one week waiting period that applies to claiming Newstart.

1.38 This measure would push the start date back to when the person had their first interview with their job service provider.

1.39 Labor Senators are concerned about the impact this measure would have on jobseekers who are not able to meet with a job provider straight away.

1.40 In particular, Labor Senators are concerned about job seekers who live in rural and remote communities and have limited access to travel or public transport.

1.41 The committee heard that this measure could place further financial strain on vulnerable Australians, due to the existing lengthy processing times that new applicants are facing. The Australian Council for Social Service explained that:

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12 Anglicare Australia, *Submission 28*, p. 5.

13 Australian Association of Social Workers, *Submission 55*, p. 3.

14 Volunteering Australia, *Submission 12*, p. 2.

15 Anglicare Australia, *Submission 28*, pp. 5–6.

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...this measure could impose substantial waiting times for people who are otherwise eligible for a payment, simply because of the time it takes the Department of Human Services (DHS) to process a payment. Latest data shows that OHS processes 82.9% of Newstart claims within 16 days. Processing times for Youth Allowance (Other) are longer, with 81.1% processed within 21 days.<sup>16</sup>

1.42 The National Employment Services Association told the committee that there was a need for:

...protection for job seekers where a lack of available and reasonably accessible appointments or reasonable grounds prevents their prompt commencement with employment services.<sup>17</sup>

### **Schedule 11: Removal of intent to claim provisions**

1.43 Schedule 11 removes provisions that allow new Centrelink claimants to have their payments backdated to the time they first contacted the Department of Human Services.

1.44 Labor Senators are concerned that this change has the potential to negatively affect the most vulnerable Australians, particularly people who may be:

- Homeless;
- Separated;
- Hospitalised or suffering from ongoing health issues;
- Unable to access technology; and
- Subject to or escaping a situation of family violence.

1.45 Labor believes that for many people in the groups above, having all the required documents on application is an unreasonable ask.

1.46 The National Employment Services Association write:

...this measure will have the greatest impact on the most vulnerable people. This may include people with less access to online services, Indigenous people without access to the internet or a physical Department of Human Services office in remote Australia, people fleeing domestic violence or separating from a partner who do not have all their documents readily available and in a state of crisis, people without stable housing and new migrants who are unfamiliar with the complex requirements of the social security system.<sup>18</sup>

1.47 Without provisions that take into account personal circumstances, Labor Senators oppose this measure.

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16 Australian Council for Social Service, *Submission 50*, p. 6.

17 National Employment Services Association, *Submission 57*, p. 4.

18 National Employment Services Association, *Submission 57*, p. 9.

**Schedule 12: Establishment of a drug testing trial**

1.48 Schedule 12 establishes a trial to drug test new recipients of Newstart and Youth Allowance (Other), from 1 January 2018, in three specific locations.

1.49 Labor Senators on this committee note that the trial locations are not specified in the Bill, but were publicly stated by the Government as being Canterbury-Bankstown in New South Wales, Logan in Queensland and Mandurah in Western Australia.

1.50 The committee heard from a large number of addiction medicine and drug treatment specialists, including Professor Alison Ritter, from the University of New South Wales, the Royal Australasian College of Physicians Chapter of Addiction Medicine, St Vincent's Health Australia, Rural Doctors Association of Australia and the Ted Noffs Foundation.

1.51 These experts unanimously raised serious concerns about the Government's proposal to drug test new jobseekers.

1.52 Dr Cassandra Goldie from the Australian Council of Social Service stated that:

...there is...no evidence that this drug testing proposal would improve health, social or employment outcomes for people. Indeed, the evidence is to the contrary. The drug test measure would direct very precious dollars—the overall costs of which are unknown—to a measure which has been widely condemned by leading health experts.<sup>19</sup>

1.53 Professor Adrian Reynolds, President of the Australasian Chapter of Addiction Medicine, Royal Australasian College of Physicians said that the Chapter was 'quite honestly at a loss to see why a drug testing trial is considered a necessary or effective way to address these issues.'<sup>20</sup>

1.54 The Committee also heard that the Government has neglected to consult with medical professionals before announcing these measures:

Addiction medicine specialists in the drug and alcohol sector more generally have not been properly consulted on these measures. We were surprised by these measures. Our analysis and advice is that the measures will be costly and ineffective and that government should consult with the sector on the development of evidence-based solutions to prevent and better address substance use disorders and increase the availability of treatment services across the nation.<sup>21</sup>

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19 Dr Cassandra Goldie, Chief Executive Officer, Australian Council of Social Service, *Committee Hansard*, 30 August 2017, p. 2.

20 Associate Professor Adrian Reynolds, President, Australian Chapter of Addiction Medicine, Royal Australasian College of Physicians, *Committee Hansard*, 30 August 2017, p. 17.

21 Prof Reynolds, *Committee Hansard*, 30 August 2017, p. 18.

1.55 Father Frank Brennan also shared this view, stating that 'to have a trial where you do not seek the consent or guidance of the health professionals, nor of the local communities, it is no trial, it is simply a political showpiece.'<sup>22</sup>

1.56 It is the view of Labor Senators on this committee that the proposed drug trials should not proceed in the face of overwhelming opposition from addiction medicine specialists and other experts.

1.57 Many of the concerns raised are also relevant to the Committee's consideration of the measures contained in schedules 13 and 14 of this Bill.

### **Lack of evidence**

1.58 Witnesses at the public hearings and submissions from experts in addiction medicine emphasised a lack of evidence for these measures.

1.59 Professor Alison Ritter, Director of the Drug Policy Modelling Program at the University of New South Wales said that the proposed measures 'lack an evidence base.'<sup>23</sup>

1.60 In addition to overwhelming evidence presented by witnesses over two days of public hearings, submissions from the following groups also point to the lack of evidence supporting drug testing income support recipients as a key point of concern:

- UnitingCare;
- 360Edge;
- Catholic Social Services Australia and Catholic Health Australia;
- The Kirby Institute;
- Cohealth;
- National Drug Research Institute;
- Australian Drug Law Reform Initiative;
- Australian Federation of Aids Organisations;
- Australian Injecting and Illicit Drug Users League;
- Western Australian Network of Alcohol and other Drug Agencies;
- Public Health Association Agency; and
- Dr Alex Wodak.

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22 Father Frank Brennan SJ AO, Chief Executive Officer, Catholic Social Services Australia, *Committee Hansard*, 31 August 2017, p. 22.

23 Professor Alison Ritter, Director, Drug Policy Modelling Program, National Drug and Alcohol Research Centre, University of New South Wales, *Committee Hansard*, 30 August 2017, p. 11.

## Availability of treatment

1.61 The Committee heard that there is already insufficient treatment available to Australians who are seeking treatment for substance abuse issues, and that the Government's proposals are likely to exacerbate this issue.

1.62 Professor Ritter told the Committee that Australia currently treats 200 000 people for substance abuse issues each year, but that an additional 200 000 to 500 000 people each year would like to receive treatment, which is unavailable to them.<sup>24</sup>

1.63 Professor Ritter hypothesised that resources in the three trial sites of Canterbury-Bankstown, Logan and Mandurah would need to double to meet existing unmet demand in these three areas.<sup>25</sup>

1.64 The Committee heard that the lack of treatment places available is compounded by workforce issues.

1.65 Professor Ritter told the Committee that 'the reality is that there isn't a workforce. Already treatment services are full and clinicians are fully occupied.'<sup>26</sup>

1.66 The Committee also heard that the Government's proposal to spend \$10 million on treatment would not be sufficient to address the existing issues.

1.67 The Committee heard that \$10 million would be a 'drop in the ocean'.<sup>27</sup>

1.68 Professor Ritter explained further:

Add up the approximate 5,000 people who might be impacted by schedule 13, the perhaps 4,000 or 5,000 people who might be impacted by schedule 14 and maybe the 10 per cent of the 5,000 drug trial recipients under schedule 12. If you divide the \$10 million by that total, you would not actually be left with enough money to treat the target population, even if you could.<sup>28</sup>

1.69 Professor Reynolds emphasised the lack of availability of treatment options, stating that 'patients needing treatment are regularly waiting six to twelve weeks for that treatment and may need to travel large distances.'<sup>29</sup>

1.70 Further, Labor Senators on this Committee are deeply troubled by revelations that the Department of Social Services does not know the length of existing waiting lists for drug and alcohol treatment in the three sites for the Government's drug testing trial.<sup>30</sup>

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24 Prof Ritter, *Committee Hansard*, 30 August 2017, p. 11.

25 Prof Ritter, *Committee Hansard*, 30 August 2017, p. 11.

26 Prof Ritter, *Committee Hansard*, 30 August 2017, p. 11.

27 Professor Reynolds, *Committee Hansard*, 30 August 2017, p. 25.

28 Prof Ritter, *Committee Hansard*, 30 August 2017, p. 12.

29 Prof Reynolds, *Committee Hansard*, 30 August 2017, p. 17.

30 Ms Cath Halbert, Group Manager, Payment Policy, Department of Social Services, *Committee Hansard*, 30 August 2017, pp. 39–40.

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## Failure to understand addiction and dependence

1.71 The Committee heard that the changes proposed in this Bill fail to comprehend substance abuse as a health issue.

1.72 The Victorian Alcohol and Drug Association criticises this Bill, and submitted that the proposals demonstrate 'a lack of understanding on how to address issues relating to illicit substance use.'<sup>31</sup>

1.73 Professor Ritter said that:

An addiction to alcohol or other drugs is an illness...it's a mental health illness...If we replace the words 'alcohol and drug dependence' with 'depression' or 'psychosis' or 'anxiety disorder' I think there would be a very different sense about this bill and its measures.<sup>32</sup>

1.74 Professor Reynolds explained that the measures in the Bill will not have the effect of curtailing use of illicit substances, and explained that singling out of substance abusers does not lead to improved outcomes:

The way in which they've been treated by services—healthcare services, police, welfare services—only further increases the likelihood that they will continue to use substances. We have individuals who have told us those stories of increasing substance use in the face of stigma and discrimination.<sup>33</sup>

## Other social impacts

1.75 In addition to evidence suggesting that the measures in the Bill will not deliver outcomes for those targeted, the Committee also heard that there is a likelihood of the measures worsening the broader drug problem and increasing crime.

1.76 The Committee heard that there is 'evidence in the Australian mining community about workers shifting to other, more harmful forms of drug use...that's a likely unintended consequence, and that's obviously a big worry if they're consuming more harmful substances,'<sup>34</sup> because they cannot be detected in the testing.

1.77 Professor Adrian Reynolds explained that pushing people with a substance addiction further into financial hardship would not result in rational decision making to prioritise spending on day to day essentials, but is likely to 'push them over the edge' and 'engage in some sort of other behaviour to maintain their addiction.'

1.78 The Professor told the committee that anecdotally, patients explain to him that they may turn to crime to fund their addiction.<sup>35</sup>

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31 Victorian Alcohol and Drug Association, *Submission 13*, p. 3.

32 Prof Ritter, *Committee Hansard*, 30 August 2017, p. 11.

33 Prof Ritter, *Committee Hansard*, 30 August 2017, p. 13.

34 Prof Ritter, *Committee Hansard*, 30 August 2017, p. 13.

35 Prof Reynolds, *Committee Hansard*, 30 August 2017, p. 18.

...as a clinician, and anecdotally, I do know that when people are addicted and their options are constrained, they may, as a priority, do what they need to do to maintain their addiction....one of those ways that they tell me they do that is by engaging in crime.<sup>36</sup>

1.79 Matthew Noffs echoed this view:

I spoke to a young boy the other day who robbed 30 houses in one night to [get money for drugs] because every other possibility of finding money to score had been taken away from him. Being threatened with the worst possible sentence doesn't deter him. Will this increase crime? Following the logic: yes.<sup>37</sup>

### **Schedule 13: Removal of exemptions for drug or alcohol dependence**

1.80 Schedule 13 removes the ability for activity tested income support recipients to be temporarily exempted from activity requirements where he need for the exemption is wholly or predominately attributable to drug or alcohol dependency or misuse.

1.81 Labor Senators on this committee understand that this could also include any sickness or injury, or special circumstances such as eviction, associated with drug or alcohol misuse.

1.82 In light of the evidence presented to the Committee and discussed above, Labor Senators on this committee do not support the measures contained in Schedule 13 of this Bill.

### **Schedule 14: Changes to reasonable excuses**

1.83 Schedule 14 removes the ability of a jobseeker to be exempted from penalties for common 'participation failures' if the jobseeker uses drug or alcohol dependence as an excuse and refuses to take up treatment.

1.84 Labor Senators on this committee understand that jobseekers can have participation in a course of treatment counted towards their participation requirements.

1.85 In light of the evidence presented to the Committee and discussed above, Labor Senators on this committee do not support the measures contained in Schedule 14 of this Bill.

### **Schedule 15: Targeted compliance framework**

1.86 Schedule 15 creates a new compliance framework for income support recipients subject to mutual obligations.

1.87 Labor Senators on this committee are concerned that this reform was produced with very little employment sector consultation, and will negatively impact jobseekers, without any apparent improvement in jobseeker employment outcomes.

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36 Prof Reynolds, *Committee Hansard*, 30 August 2017, p. 25.

37 Mr Matthew Noffs, Chief Executive Officer, Ted Noffs Foundation, *Committee Hansard*, 30 August 2017, p. 30.

1.88 The committee heard from key employment service provider, the National Employment Services Association, that the Department had barely discussed the proposed changes to the compliance framework.

1.89 The National Employment Services Association explained further that the changes would require existing members of the workforce to undergo training and that it would be important for 'the Commonwealth [to provide] training to ensure consistent and fair application of demerit points and conduct of capability assessments by the employment services sector.'<sup>38</sup>

1.90 The committee heard that despite introducing suspensions for the first four demerit points to allow some people to reform their behaviour before receiving a financial punishment, the system will see more people lose payments than before.<sup>39</sup>

1.91 The committee did not hear any evidence to suggest that cutting financial support to jobseekers will assist them to find work.

1.92 The committee heard that evidence from the United Kingdom showed tougher compliance sanctions:

...were found to increase the risk of participants becoming homeless and had negative outcomes for mental and physical health, self-esteem, relationships and engagement with the labour market. Further, strict sanction regimes harm psychological wellbeing and disrupts people's effort to secure work in unintended ways (such as fulfilling compliance requirement rather than searching efficiently for the best job available).<sup>40</sup>

1.93 Further, the committee heard that the usual waivers and discretion currently given to employment service providers and the departmental staff will be largely removed from the system.<sup>41</sup>

1.94 The removal of waivers and discretions reduces the ability to take into account individual jobseeker circumstances and increases the risk that jobseekers are onerously impacted by any errors or arbitrarily harsh decision-making.

1.95 Uniting Care said the removal of waivers was 'punitive' and would have 'sustained impacts on job seekers, as well as any dependents they may have.'<sup>42</sup>

1.96 Mission Australia said this change could, 'increase the risks of people becoming homeless and have negative outcomes for their physical and mental health, self-esteem, relationships and engagement with the labour market.'<sup>43</sup>

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38 National Employment Services Association, *Submission 57*, p. 8.

39 Mr Matthew Butt, Executive Officer, National Social Security Rights Network, *Committee Hansard*, 30 August 2017, p. 9.

40 Australian Council of Social Services, *Submission 50*, p. 15.

41 Mr Hehir, *Committee Hansard*, 30 August 2017, p. 60.

42 UnitingCare, *Submission 6*, p. 8.

43 Mission Australia, *Submission 8*, p. 2.

1.97 Labor Senators on this committee note that the concept of reforming the compliance framework is not without merit, but cannot recommend that the Senate support the measure in its current form.

### **Schedule 17: Information management**

1.98 Schedule 17 aligns the 'coercive information gathering provisions' in a number of existing Acts and allows information obtained by the Department of Human Services under these provisions to be used in subsequent investigations and prosecutions of criminal offences.

1.99 Victoria Legal Aid has raised significant concerns with the changes in this schedule, which Labor Senators on this committee share.

1.100 These amendments seek to increase investigations and prosecutions against some of the most vulnerable people in our community – typically those on low income and therefore limited access to quality legal representation.

1.101 This amendment seeks to impinge on the common law right of privilege against self-incrimination.

1.102 Victoria Legal Aid submits that 'these changes could extend the practice of shifting the burden of gathering information from the Department to the individual.'<sup>44</sup>

1.103 Victoria Legal Aid raised concerns that the provisions will have an adverse impact on individuals, and potentially result in a term of imprisonment. They write that:

...while this penalty does not apply if a person has a reasonable excuse, or only applies to the extent to which a person is capable of complying with the requirement, the Department has not exercised their powers with restraint to date nor has it demonstrated a level of reasonableness that the community expects.<sup>45</sup>

1.104 The National Social Security Rights Network explained that:

...the schedule contains provisions which expressly abrogate the privilege against self-incrimination, subject to immunity in relation to the use of the information or documents.<sup>46</sup>

1.105 The National Social Security Rights Network submitted that this measure 'should be removed from this bill.'<sup>47</sup>

### **Recommendations**

1.106 The Committee has heard that the changes in this Bill will exacerbate inequality as well as stigmatise and punish the most vulnerable members of our communities.

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44 Victoria Legal Aid, *Submission 53*, p. 2.

45 Victoria Legal Aid, *Submission 53*, p. 3.

46 National Social Security Rights Network, *Submission 18*, p. 15.

47 National Social Security Rights Network, *Submission 18*, p. 15.

**Recommendation 1:**

**It is recommended that the Senate reject the Bill.**

**Senator the Hon Lisa Singh**

**Senator Murray Watt**

