

Submission to the Senate Standing Committees on Community Affairs – Community Affairs References Committee

Response to the Inquiry into ParentsNext,
including its trial and subsequent broader rollout

Good Shepherd Australia New Zealand

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Submission to Senate Community Affairs References Committee: ParentsNext

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About Good Shepherd Australia New Zealand

Good Shepherd Australia New Zealand (Good Shepherd) is a community services organisation that aims to disrupt the intergenerational cycle of disadvantage with a focus on women, girls and families. We are part of the global Good Shepherd network working to create just and equal communities where women and girls can live full, safe lives. We provide integrated community-based programs and services that support individuals and families at vulnerable times in their lives.

A central part of our purpose is to challenge the systems that entrench poverty, disadvantage and gender inequality. The Women's Research, Advocacy and Policy (WRAP) Centre does this through a range of research, policy development and advocacy activities.

Good Shepherd is part of a global network of services and advocates established by the Congregation of Our Lady of Charity of the Good Shepherd, with representation at the United Nations as a Non-Government Organisation.

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Executive summary

Good Shepherd Australia New Zealand (Good Shepherd) supports the stated objectives of ParentsNext as a pre-employment program that helps parents identify their education and employment goals and participate in activities that enhance their job readiness. Pre-employment programs can address disadvantage by supporting people to enter the labour market. However, Good Shepherd is concerned about several aspects of the design and implementation of ParentsNext, including flawed assumptions in relation to motherhood and work and the program's disconnect with the changing nature of the labour market.

Our objections to ParentsNext include its misplaced focus on parents of infants and very young children. We note that Australian mothers carry a heavy load of non-market caring work which limits their capacity to engage in the labour market. Infants in particular require intensive around-the-clock care, creating a practical constraint on time for other activity.

Good Shepherd does not support the linking of participation in ParentsNext with income support payments, including the authority of private contractors to suspend payments for non-compliance. Emerging evidence suggests that the program is driven by compliance and short term outcomes rather than the long-term economic security of participants. Inflexibility in program delivery is resulting in a poor service experience for clients, who may be experiencing complex forms of disadvantage. The low level of income support and systemic issues such as insecure housing, intimate partner violence and lack of child care can also operate as barriers to participation.

ParentsNext includes a focus on improving parenting skills which bear no relation to labour market outcomes. This aspect of the program is an unnecessary government incursion into participants' family life which potentially undermines their agency, confidence and self-efficacy. A better approach to supporting parenting in the early years is to fund voluntary, community-based programs such as Good Shepherd's Sydney Young Parents Program, which provides individual support, role modelling and reinforcement of positive parenting practices, and social connectedness through the non-stigmatising environment of a supported playgroup.

We are also concerned that ParentsNext undermines Australia's human rights obligations with respect to its targeting of single mothers and Aboriginal and Torres Strait Islander people.

There is potential for ParentsNext to be redesigned to provide genuine assistance to mothers with young children to increase their employability if it is structured in a way that enables rather than punishes them through a one-size-fits-all approach and compliance-driven activities. A voluntary program that incorporates tailored, holistic support which is coupled with an increase in the level of income and other supports, would achieve better outcomes for single mothers and their children.

1. Introduction

Good Shepherd Australia New Zealand (Good Shepherd) recognises and values the dignity that comes with participation in employment. Access to decent employment and educational opportunities is essential for disrupting the intergenerational cycle of disadvantage and enabling fullness of life for women, girls and families. Good Shepherd supports policies and programs which enable greater economic participation of vulnerable groups. However, we have concerns that the model employed by ParentsNext undermines its stated intentions through a narrow focus on mothers which undermines the role of parenting in the early years. We also have concerns regarding the linking of program participation to income support payments, the program's overreach into the family life of citizens by mandating parenting activities, and a concurrent lack of investment in housing, employment policies and child care to reduce structural and cultural barriers to labour market participation.

In this submission, we respond to Terms of Reference a, b (i, iii, iv, vii, viii, ix, and x), c, and e, with a focus on how ParentsNext affects those with whom we work, including young single parents and women who have current or previous experiences of family violence. We also highlight concerns regarding human rights and outline alternative, evidence-based ways that could be employed to support greater workforce participation by parents of young children.

We would welcome the opportunity to provide verbal evidence to the Committee.

A note on this submission: Good Shepherd Australia New Zealand prepared a submission in October 2017 to the then Department of Employment in response to their Discussion Paper for the ParentsNext National Expansion. Material from that submission has been incorporated into this submission. We also refer to a survey which has been administered by the National Council of Single Mothers and their Children (NCSMC) and the Council of Single Mothers and their Children Victoria (CSMC). We have also discussed the ParentsNext model with the practitioners from our Sydney Young Parents Program; their practice wisdom regarding what would be most helpful for their clients has been incorporated into our recommendations.

We also note that key documents are unavailable on the Australian Government's websites, including the ParentsNext Discussion Paper from the 2017 ParentsNext expansion and the Schedule of outcome payments (incentive bonuses available to contractors).

2. Recommendations

Recommendation 1: ParentsNext should be redesigned to recognise and address the systemic nature of barriers to employment for parents of young children, including adopting a person-centred and holistic approach to:

- accommodate those who are unable to engage in employment due to unpaid caring responsibilities or other barriers to labour market participation;
- replace the linking of program participation to income support payments with a focus on supporting individual capability and agency in relation to long term employment outcomes; and
- provide tailored pre-employment support, including greater assistance with out-of-pocket costs for participation, child care, and counselling and referral to support services for clients with complex needs.

Recommendation 2: The design of ParentsNext should be changed to:

- de-link program participation from income support payments;
- be accessible to other groups of people who are seeking pre-employment training and assistance; and
- be supported by implementation guidelines to ensure that clients are engaging in meaningful activities and are provided with a high quality service.

Recommendation 3: The focus on parenting skills and activities should be removed from ParentsNext and be replaced by funding from the Department of Human Services for evidence-based programs within non-stigmatising environments. These programs should be run by qualified practitioners within the social services sector, and provide a wrap-around service response.

Recommendation 4: A review of Parenting Payment Single and associated payments should be undertaken to consider their adequacy for supporting single parent families, including supporting child development and wellbeing, and parity with other payments.

Recommendation 5: The ParentsNext Participation Fund:

- should not subsidise the Wage Subsidy for employers;
- should be made available to clients to use for the cost of education and training; and
- should be used to support realistic and viable career pathways, rather than encouraging types of employment that will not lead to long-term financial security.

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Recommendation 6: ParentsNext providers should be required to ensure that client service staff hold formal qualifications which enable them to engage effectively with their clients, including vulnerable people experiencing complex forms of disadvantage.

Recommendation 7: Women who are experiencing or recovering from any form of intimate partner violence should be exempted from ParentsNext and all other compliance requirements pertaining to their income support payments.

Recommendation 8: Women who are experiencing housing insecurity, including homelessness and those in crisis and transitional housing, should be exempted from ParentsNext.

Recommendation 9: Aboriginal and Torres Strait Islander parents should be exempt from mandatory participation in ParentsNext, and where ParentsNext is delivered in Aboriginal and Torres Strait Islander communities it should be redesigned through a genuine co-design process with Aboriginal Community Controlled Organisations and local Aboriginal and Torres Strait Islander program participants.

Recommendation 10: Develop formal mechanisms for ParentsNext providers to exchange knowledge, including the provision of forums to engage meaningfully with clients to leverage their insights to improve service delivery and long-term outcomes.

Recommendation 11: ParentsNext should be de-linked from the Targeted Compliance Framework and be replaced with a voluntary, person-centred approach to program participation.

3. Term of Reference A – the aims of ParentsNext

The aims of ParentsNext, and the extent to which those aims are appropriate, having regard to the interests of participating parents, their children, and the community

ParentsNext is described as a ‘pre-employment program’ that is primarily targeting women with children under the age of six who have been receiving a parenting payment for at least six months continuously and have no reported employment earnings in the previous six months. According to the ParentsNext Discussion Paper (2017), the ‘intensive stream’ is aimed at 30 communities which are predominantly Indigenous. Additionally, the Discussion Paper states that “approximately 96 per cent of . . . participants [are] expected to be women”.¹

The stated objectives of ParentsNext are to:

- target early intervention assistance to parents at risk of long-term welfare dependency;
- help parents identify their education and employment-related goals and participate in activities that help them achieve their goals; and
- connect parents to local services that can help them address any barriers to employment.²

In principle, Good Shepherd supports these objectives. We acknowledge the role of education as a pathway to economic security and the transformational effects of targeted social service interventions to address poverty and other forms of disadvantage. We also note the particular barriers to employment for women with young children, including long-standing barriers such as the gender pay gap and occupational segregation, the impact of recent structural changes to the labour market and women’s disproportionate responsibility for unpaid caring work. We explore these issues in more detail below as they relate to the assumptions underlying the aims of ParentsNext.

Motherhood and work

Several elements of ParentsNext are problematic, including underlying assumptions about motherhood and work, the program’s effectiveness as a policy intervention to support labour market participation, punitive aspects of the program including the use of a compliance framework, and unintended negative impacts on women and their families. As explored throughout this submission, these elements include:

- An incomplete understanding of ‘work’ which devalues and undermines the role of parenting in the early years.
- A lack of knowledge in relation to changes in the labour market and the employment challenges unique to mothers.
- An assumption that clients who are enrolled in the program are able to undertake pre-employment activities.

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- Punitive welfare conditionality elements, including the application of the program to parents of infants and very young children, and the demerit point penalty system.
- The use of private contractors to engage with highly vulnerable populations, including the authority to suspend payments for non-compliance.
- An inflexible approach which cannot adapt to individual circumstance, including participants who are already on track to achieve employment-ready outcomes of their own volition, and alternatively, participants who face multiple barriers to effective engagement.
- An overreach into the family life of participants by mandating parenting activities which have no relevance to labour market participation.

To understand these objections to ParentsNext a fundamental shift in viewpoint concerning mothers and work is required. Underlying ParentsNext, as with other forms of welfare conditionality, is the assumption that people drawing on income support while engaging in child rearing are not working because they are not in the labour market.

Women and unpaid work

ParentsNext participants - as with all parents of young children - carry a heavy load of non-market caring work which limits capacity to engage in the labour market. In Australia, as in all OECD countries, mothers have responsibility for the majority of caring work.³ The Workplace Gender Equality Agency reports that women spend nearly 65 per cent of all their work hours in unpaid work, while for men it is approximately 36 per cent.⁴

The Australian Institute of Family Studies reports that the birth of a baby raises a woman's caring duties from an average of 2 hours per week to 51 hours per week, and housework duties from 16 hours per week to a minimum of 25 hours per week.⁵ These statistics include partnered and unpartnered mothers, meaning that 76 hours per week is the *minimum* amount of time an unpartnered mother will spend caring and looking after the household.

This amount of time spent in unpaid work functions to limit the amount of time available to undertake other activities. Analysis of Australian time use data shows that lone parents spend more time providing child care than partnered mothers, including many more hours alone with their children.⁶ Infants in particular require intensive around-the-clock care, creating a practical constraint on time for other activity.

Unpaid work is a critical component of the formal economy. PriceWaterhouse Coopers estimates conservatively that unpaid labour contributes nearly 34 per cent of the entire economy, totalling over \$565 million.⁷ This makes it the largest 'industry' in Australia - one that is overwhelmingly sustained by women's labour. Critical inputs include care of older people, adults who need care

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due to disability, chronic illness or injury, child care, household tasks and volunteering.⁸ This unpaid labour is essential for the reproduction of the future workforce, including adults who will take on the formal and informal care of older people as the population ages. As economist Nancy Folbre has argued, children are not simply a private choice; they are a shared social good in that they provide broader economic benefits.⁹ When viewed this way, women bear the time, energy and opportunity costs of raising children, providing an essential public service, while people who do not participate in child rearing are ‘free riding’ on the labour of those who do.¹⁰

Women and the myth of ‘welfare dependency’

Another assumption is that mothers of young children who receive income support are on a path to long-term ‘welfare dependency’. However, data from the Household, Income and Labour Dynamics in Australia (HILDA) survey indicates that most women in receipt of income support remain reliant on this form of income for 4 years or less, and these years coincide with the prime child-bearing and child-rearing years (see Figure 1 below).¹¹ Overall reliance on social security payments has been steadily dropping since 2002; excluding Aged Pension recipients (the largest expenditure) further reduces 2013 rates from 27.48 to 14.88 per cent.¹² As current policies encouraging job-seeking behaviour are targeting towards the most disadvantaged groups, they may therefore be causing more harm than benefit.¹³

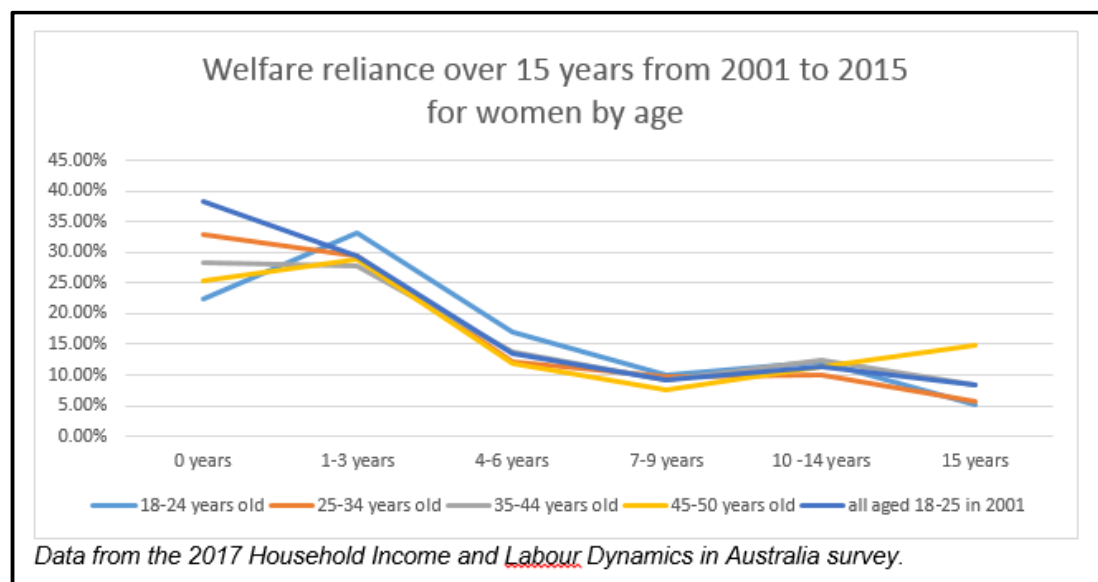


Figure 1: Length of time to receive welfare by age

The changing nature of work and its impact on women

The third assumption underlying ParentsNext is the view that ‘the best form of welfare is a job’.¹⁴ There are two concerns with this policy stance. First, Good Shepherd is concerned that policies which are focussed on the most disadvantaged people are underestimating the many barriers they

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face to employment. In our own research, just under 25 per cent of women we interviewed felt they were unable to engage in employment; reasons they gave included experiences of disability, clinical diagnoses, intensive caring duties for family members, and current or previous experiences of intimate partner violence.¹⁵ These women felt harassed by their jobactive providers and experienced great difficulty in obtaining exemptions, which were generally short-term in nature.¹⁶

Second, this assumption ignores the changing nature of employment - for the first time less than half of employed Australians enjoy full time, secure employment with entitlements.¹⁷ Secure employment is being eroded by increased automation, deregulation, casualisation, wage stagnation and accompanying erosion of employment protections.¹⁸ While overall rates of casual employees have remained steady across the past 20 years,¹⁹ it should be noted that the gender gap in the casual workforce is shrinking; the secure positions men used to hold appear to be disappearing (see Figure 2, below), perhaps driven by the proliferation of the on-demand workforce or 'gig economy'. Concerns about the on-demand workforce, including the ambiguity of these workers' status and the lack of data on pay and conditions of this form of employment, have pre-empted an inquiry currently underway in Victoria.²⁰ For example, some research shows that rideshare drivers earn an average of \$16 per hour, which is lower than the minimum wage,²¹ while other research has found a gender wage gap in the gig economy.²² There is evidence that the policy responses to these changes in workforce participation are exacerbating the problem rather than addressing it effectively,^{23 24} resulting in women - and single mothers in particular - facing even greater barriers to attaining secure and well-paid employment.²⁵

At the same time, the ABS has recorded a growth in secondary jobs,²⁶ which indicates that primary jobs are not providing enough income to cover the cost of living and other expenses. Coupled with other characteristics of women's employment such as occupational segregation,²⁷ the gender pay gap, the flexibility gap, overrepresentation in part time work (44 per cent of all employed women work part time compared to 16 per cent for men²⁸), the poor quality of many part-time roles²⁹ and low wage growth in recent years, a job will not necessarily provide increased financial security for ParentsNext participants.

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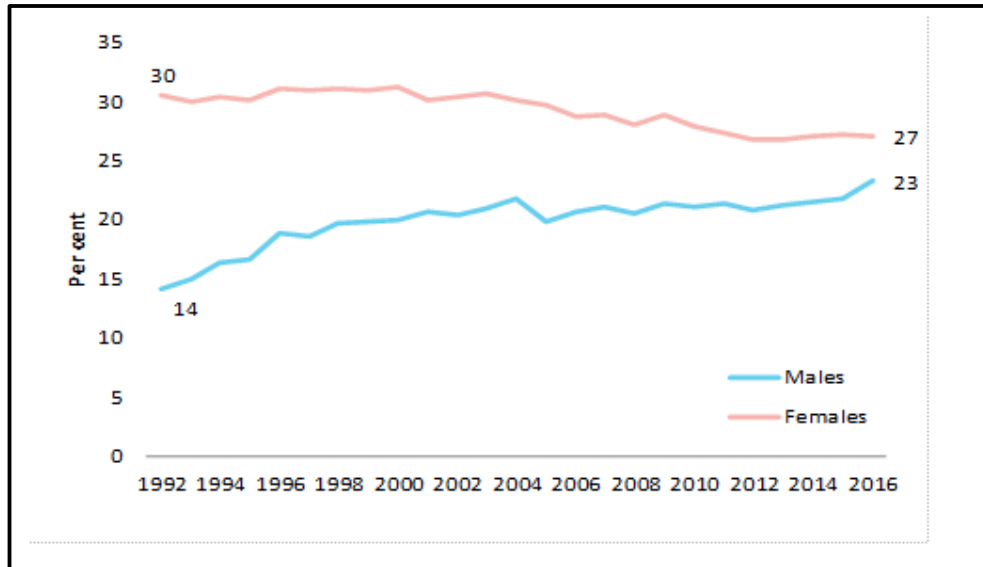


Figure 2: Casual share of total male and female employees, 1992-2016 (Source: ABS https://www.qph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp1718/CasualEmployeesAustralia#_Toc504135069)

These statistics are reflected in the lived experience of Good Shepherd’s clients. Practitioners in our services tell us that clients earning as little as \$100 per week results in a deduction from the Parenting Payment Single (see also Figure 3 below), despite the attendant costs associated with employment such as child care, transportation and/or appropriate clothing. Some of the mothers we work with are teenagers or in their early 20s and the types of employment available to them are simply not worth the costs of getting to work, or financial penalties of cycling in and out of precarious work and reduced payments.

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The most gross income you can earn before we reduce your payment depends on how many children you have.

| Number of children | Most gross income you can earn a fortnight to get the full payment |
|--------------------|--|
| 1 | \$188.60 |
| 2 | \$213.20 |
| 3 | \$237.80 |
| More than 3 | \$237.80 plus \$24.60 for each extra child |

Your payment will reduce by 40 cents for every dollar you earn over this amount.

Figure 3: Schedule of deductions to the Parenting Payment Single by number of children and earned income. Source: Department of Human Services
(<https://www.humanservices.gov.au/individuals/services/centrelink/parenting-payment/how-much-you-can-get/income-and-assets-tests>)

Encouraging mothers of infants and young children to accept roles which will lead to a cycle of poor quality, precarious work may entrench poverty and disadvantage and operate against the aims of the program. Despite this, ParentsNext providers receive an ‘outcome payment’ when a participant achieves ‘sustainable employment’ - which is defined as a minimum of 15 hours per week in paid employment for at least 12 weeks.³⁰ As noted Section 4 - iv, this financial reward for the provider is unlikely to generate sustainable financial outcomes for clients. However, as the recently published evaluation of ParentsNext did not explore the quality of client employment, it is difficult to accurately assess the impact of the program in this area.

The motherhood penalty

The difficulties of returning to employment following the birth of a child are well documented. Caring responsibilities and associated housework create significant time pressures for all mothers, and as a result mothers are likely to accept employment that has lower earning potential, a less certain career trajectory, fewer opportunities to step into leadership or management roles, reduced autonomy, and increased precarity.³¹ Some mothers elect to remain at home, delaying the return to the workforce, with analysis of ABS data showing that caring for children is the primary reason why mothers are not in the workforce.³² While lack of child care is a barrier, it is not merely a matter of availability - for many mothers the cost of child care (and attendant tax disincentives)

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means it is not fiscally logical for them to return to employment in a full time capacity.³³ Gendered social norms and the preferences of women themselves often mean that the responsibility for the day-to-day care of children, particularly pre-primary school, falls to mothers.³⁴

For single mothers, who do not have a partner to share parenting duties with, it is unsurprising that the age of their youngest child directly correlates to the likelihood that they will be in employment. According to ABS data, nearly 60 per cent of single parents with a child under the age of four years are unemployed; this number reduces to 27 per cent when the youngest is older than 15 years (see Figure 4, below). While the number of women who return to their previous position following the birth of a child is at an all-time high of 77 per cent,³⁵ for single women it is unrealistic to assume this will be possible. Single mothers have the disadvantage of a career break while their children are very young, which can make it more difficult to return to employment when the children are older.³⁶

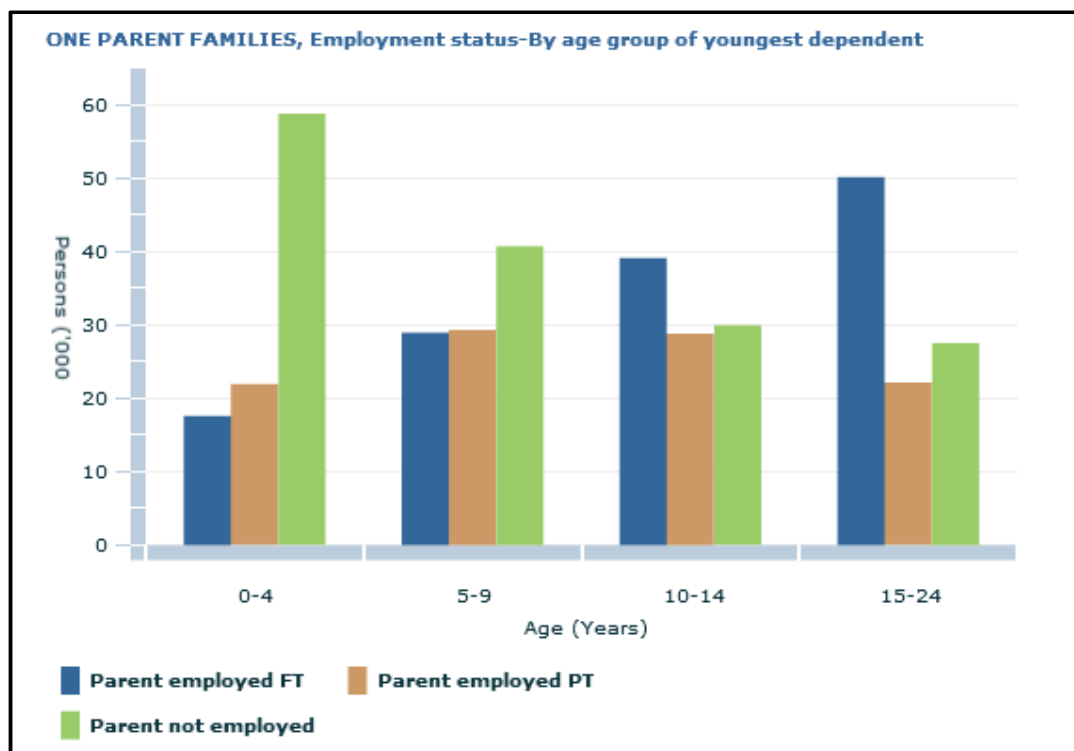


Figure 4: Single parent families and employment status by age of youngest child. Source: ABS (June 2016)

The potential of ParentsNext

Given the many challenges of combining care of young children and employment combined with higher levels of disadvantage or complexity for many women enrolled in the program, the brief for ParentsNext should be to reduce the negative impact of single mothers' long career break and enhance their capability to enter and remain in the workforce in future.

Preparing parents for entry in the labour market through knowledge and skill development is critical, particularly for young people who have left school early. The Australian Curriculum, Assessment and Reporting Authority (ACARA) report that 83 per cent of all females achieve a year 12 certificate, compared to 76 per cent of males; however, this varies widely by socio-economic status (SES) and state (the lowest completion rates for females are in the Northern Territory for those from low-SES backgrounds, at 23 per cent, while females in South Australia with high-SES backgrounds have the highest rates, at 97 per cent).³⁷ A 2017 analysis conducted by The Mitchell Institute finds that of those who leave school without a year 12 certificate, the majority - 91 per cent - will not earn their certificate across their lifetime.³⁸

According to the ParentsNext Evaluation Report, 50 per cent of the early school leavers enrolled in the program (n=990) were working towards completing their certificate.³⁹ However practitioners in Good Shepherd's Sydney Young Parents Program note that for many of their clients a year 12 certificate would not be considered particularly helpful. Rather, a more vocational focus on skill development through TAFE courses would be seen as beneficial. It is therefore important to allow clients to direct their pathway in a way that fits with their circumstances and preferences.

The ParentsNext Participation Fund could therefore be extremely useful to women who are looking to complete their certificate or attain skills or further education through TAFE, a university degree or other certified coursework. However, its use should be client-directed and the amount high enough to cover a reasonable percentage of the out-of-pocket costs (we discuss the Participation Fund further in Section 4, Term of Reference B - iii).

In summary, there is potential for ParentsNext to assist mothers with very young children to increase their employability, and genuine assistance would be welcome by many who are currently enrolled in the program.

The views of ParentsNext participants

In an unpublished report, the Council of Single Mothers and their Children Victoria (CSMC) visited Shepparton in March 2018 to speak to providers and clients. While a very small sample, it is noteworthy that clients applauded the intentions of the program. They also felt strongly that the program was not realising positive outcomes, as one participant stated, "It's a good concept that

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doesn't work. There is not enough money to support real learning or getting good skills and it is only luck if you get a good worker".⁴⁰ The main benefit of ParentsNext that the participants could identify was that it created a bridge to jobactive, "which is much more demanding on parents and less forgiving."⁴¹ From the perspective of this group of women, ParentsNext operates as a training ground for long-term dependence on income support, working against the stated aims of the program.

In the National Council of Single Mothers and their Children (NCSMC) survey of ParentsNext participants,⁴² these sentiments were reinforced. One respondent said:

[I] can't wait to get back into full time work . . . The longer you are out of work the scarier it is and yes please and thank you for the help to get back into work. But the 'attend or lose payment' is so aggressive . . . Make people feel confident not like they are sh*t and begging.⁴³

Another survey respondent said:

There's no help being offered here. It is not about supporting our individual needs, it is about complying. Not one word of help has been offered even though I was looking forward to the help and thought finally there was a breakthrough and finally society [is] understanding of how hard it is to raise children whilst also working and studying, but it was just a nasty trick.⁴⁴

In summary, while Good Shepherd supports the stated aims of the ParentsNext program and notes that the program's intentions are welcomed by many mothers with young children, the design and implementation of the program is at odds with achieving its aims. In part this is because ParentsNext is focussed on individual interventions in response to systemic barriers, as well as the program's mandatory nature and compliance-driven approach. These aspects are explored in more detail in Sections 4 and 5.

Recommendation 1: ParentsNext should be redesigned to recognise and address the systemic nature of barriers to employment for parents of young children, including adopting a person-centred and holistic approach to:

- accommodate those who are unable to engage in employment due to unpaid caring responsibilities or other barriers to labour market participation;
- replace the linking of program participation to income support payments with a focus on supporting individual capability and agency in relation to long term employment outcomes; and

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- provide tailored pre-employment support, including greater assistance with out-of-pocket costs for participation, child care, and counselling and referral to support services for clients with complex needs.

4. Term of Reference B – the design and implementation of ParentsNext

Good Shepherd has several concerns about the design and implementation of ParentsNext. These include:

- The apparent lack of client segmentation to enable effective targeting of parents who may benefit from the program.
- The compulsory aspect of participation, including the targeting of women and Aboriginal and Torres Strait Islander communities.
- The coupling of what is described as a support program to a compliance framework.
- The wide remit of the program, which includes parenting skills in addition to education and pre-employment skills.
- The use of private contractors to monitor women in the program, including the ability to cut their income support payments.
- The unclear nature of the services being provided by ParentsNext providers, outside of a monitoring role.
- The rigid, inflexible nature of the program and the focus on maintaining compliance.

These issues are explored further in this section.

The appropriateness of eligibility for compulsory and voluntary participation (i)

The ParentsNext model offers potential benefits for some groups of women. However, Good Shepherd has heard multiple stories of women who either already possess capabilities that are targeted by the program (and therefore compliance requirements are a time-waster or a distraction for them), or women who are in such precarious situations (such as insecure housing or with complex health needs) that meeting the requirements of the program is extremely difficult.

Further, it is concerning that a pre-employment program is deliberately targeting single women with very young children who are on the Parenting Payment. As noted in Section 3, this is the most time-poor demographic in Australia, and as such it is questionable why they are being singled out. It is unclear why a pre-employment program is not voluntary and open to all people who are

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marginalised and struggling to engage or re-engage with employment. Supports for people who wish to increase their knowledge and skills and be 'job-ready' should be available to all people who meet pre-set criteria, and reflect realistic study, training or apprenticeship goals. The labour market is undergoing rapid transformation, and it is not only single mothers who will struggle to find viable employment in this context.

The 'intensive' stream of ParentsNext is delivered in 30 locations with high numbers of Aboriginal and Torres Strait Islander parents. Aboriginal and Torres Strait Islander individuals and communities have repeatedly been the target of policies which erode autonomy and self-determination, and are also subject to highly controlling forms of conditional income support, such as the Cashless Debit Card.⁴⁵ We explore this issue further in Section 4 - viii below.

The design of participation plans, including the range of economic and social participation requirements (iii)

Lack of implementation guidance and limited practical support

A key flaw with the ParentsNext model is its lack of clear focus. While this aspect potentially allows clients to self-identify their own development pathway, it appears to have led to a strong overreach by contracted providers who have little guidance for implementation but work hard to achieve an 'outcome payment' of \$300 when a participant either achieves an educational goal or sustainable employment.⁴⁶

There appears to be few guidelines for providers in terms of appropriate implementation of ParentsNext. There are many stories, both documented and anecdotal,⁴⁷ concerning current employment⁴⁸ and study⁴⁹ going unrecognised by the provider, meaning an 'approved activity' must be added to achieve compliance. Payments are suspended immediately once a client is unable to attend a meeting or her approved activity due to illness⁵⁰ or the 'activity' being closed for the holidays.⁵¹ It has also been reported that women are being forced to sign up for the program and sign a privacy waiver even though they are exempt according to the program's criteria.⁵²

The findings from the NCSMC survey confirms these reports. Pertaining to job readiness, 87 per cent of respondents disagreed or strongly disagreed with the statement, "[ParentsNext] has assisted me to build 'job ready' confidence and skills," while 85 per cent disagreed or strongly disagreed with the statement, "[ParentsNext] has assisted me to think about a career path." Some of the responses from the survey include the following:

Help is fantastic. Telling single parents that they will not have rent money if they don't click a button on a certain day or if there is a glitch in the system their payment might not go through, is gross.

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This ParentsNext provider was a heartless saleswoman. Spoke in a rough, harsh voice. Had a no nonsense and no excuses approach. No compassion or empathy or anything . . . The person was mean and rude and threatening.⁵³

Participation requirements in these instances are not advancing parents' job readiness, but instead are adding to their stress and reducing their autonomy.

Recommendation 2: The design of ParentsNext should be changed to:

- de-link program participation from income support payments;
- be accessible to other groups of people who are seeking pre-employment training and assistance; and
- be supported by implementation guidelines to ensure that clients are engaging in meaningful activities and are provided with a high quality service.

Encouraging uptake of poor quality work

Good Shepherd is concerned that the types of employment that are being encouraged for ParentsNext clients will not lead to secure employment, including viable long-term career pathways. A Canadian study conducted by Liegghio and Caragata⁵⁴ found that government-sponsored training initiatives move single mothers out of 'welfare poverty' and into 'work poverty' through the promotion of precarious employment which offered little stability, low pay and few benefits. The researchers also report that service providers tended to individualise their clients' poverty and stigmatise them as irresponsible and incompetent, and as a result mental health and wellbeing was compromised for many women. This finding was confirmed by Australian researchers.⁵⁵

The focus on supporting parenting skills is misplaced and inappropriate

The Department of Jobs and Small Business is overseeing a program which purports to impart parenting skills and support. Intermingling the dual foci on assisting parents with young children to be job-ready and to improve their parenting skills potentially dilutes the effectiveness of both. Further, there does not appear to be any logic to providing both pre-employment support and parenting skills support, and the evaluation of ParentsNext has not assessed the effectiveness of this aspect of the program.

As a compulsory program, this aspect of ParentsNext is also an unnecessary government incursion into the private life of families, potentially undermining the agency, confidence and self-efficacy of new parents. The findings of the NCSMC survey indicate that most participants are not finding the

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program assists them with parenting. Pertaining to parenting and child wellbeing, 86 per cent disagreed or strongly disagreed with the statement: “[ParentsNext] has increased my knowledge and parenting confidence,” while 61 per cent disagreed or strongly disagreed with the statement: “ParentsNext has had a positive impact on my child.” A further 59 per cent agreed or strongly agreed to the statement: “ParentsNext has not introduced my child to new activities as we were already attending or planned to attend the activities”.⁵⁶

A better approach to supporting parenting in the early years is to fund voluntary, community-based programs such as Good Shepherd’s Sydney Young Parents Program, which provides individual support and case management in a safe and non-stigmatising environment, access to tailored programs for young parents, social connectedness through a weekly supported playgroup, modelling and reinforcement of positive parenting practices, and links to other community support services. Australian research indicates that such playgroups are highly acceptable and enjoyable to families,⁵⁷ and are therefore a good focal point for introducing other interventions or supports. For disadvantaged families, more intensive and comprehensive interventions are needed to ensure children attain key developmental milestones. This includes antenatal support, access to early childhood resources, and ensuring children are school-ready.⁵⁸ These types of interventions should be overseen by the Department of Human Services rather than the Department of Jobs and Small Business.

Perhaps the best intervention to encourage both good parenting and positive outcomes for children is to ensure an adequate level of income for families. Single parent families have the highest poverty rate of all family types in Australia, while children in single parent families, with a poverty rate of 39 per cent, are more than 3 times as likely to live in poverty as children in couple families (13 per cent of whom are in poverty).⁵⁹ The research on this topic is unequivocal: adequate income (whether through income support and/or child support) leads to reductions in child maltreatment;⁶⁰ increases in positive child development markers, maternal health, and mental health;⁶¹ improved child test scores in reading and maths;⁶² and improved overall educational performance.⁶³ Conversely, reduction in income support for single parents is directly correlated to a range of negative outcomes for children, including poor mental health, emotional difficulties, behavioural problems,⁶⁴ increased anxiety, increased social isolation and relational support, and an increased sense of social stigma.⁶⁵ As one researcher succinctly frames it:

High levels of family economic distress and vulnerability compromise child wellbeing, and exposure to such risks differs by race and ethnicity. Welfare agencies that restrict entry, push welfare exits, and offer only a work-first message exacerbate rather than help the situation of poor families.⁶⁶

Lifting the rate of Parenting Payment Single to the rate of the Single Age Pension would be one way to reduce poverty in single parent households, while a wider review of Parenting Payment

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Single and associated payments could identify more substantive changes to improve the financial security of single parents and their children.

Recommendation 3: The focus on parenting skills and activities should be removed from ParentsNext and be replaced by funding from the Department of Human Services for evidence-based programs within non-stigmatising environments. These programs should be run by qualified practitioners within the social services sector, and provide a wrap-around service response.

Recommendation 4: A review of Parenting Payment Single and associated payments should be undertaken to consider their adequacy for supporting single parent families, including supporting child development and wellbeing, and parity with other payments.

The Participation Fund and the Wage Subsidy

Wage Subsidies are a financial incentive used within ParentsNext and other government programs to encourage employers to hire eligible participants in ongoing jobs by contributing to the initial costs of hiring a new employee. Wage Subsidies have the potential to provide a practical incentive for potential employers to employ a client of the ParentsNext program. However, Good Shepherd has some concerns regarding how the Wage Subsidy is being implemented. First, a review of various employment incentive schemes found that the benefits of wage incentives (which are paid out over an extended period of time) tend to be temporary and can lead to many unintended negative outcomes, while hiring incentives (which are short-term) tend to lead to more stable employment outcomes across time and with fewer negative consequences.⁶⁷ It is therefore important to understand how such incentive programs interact with other policies and the current reality of the labour market. Second, Good Shepherd strongly disagrees with the new policy, enacted as of 2 January 2019, whereby Wage Subsidies are provided out of the Participation Fund.⁶⁸ It should not be the case that a client must forego, for example, the opportunity for further study as a part of their pathway into meaningful employment, in order to provide what may be at times a short-term incentive to an employer.

There is great potential for the ParentsNext Participation Fund. Many parents of young children are eager to engage with education or attain qualifications at a slow pace while their children are young as part of a long term goal of financial independence. This includes Aboriginal and Torres Strait Islander people, who are increasingly earning vocational qualifications according to recently-published research.⁶⁹ However, while there is potential for this much-needed assistance, results from the NCSMC survey of ParentsNext participants indicates that the Participation Fund is not

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being used effectively. For example, 69 per cent of respondents disagreed or strongly disagreed with the statement: “The provider has helped you to access financial assistance and/or support to locate childcare”, while 81 per cent disagreed or strongly disagreed with the statement: “The provider has told you what ‘stream’ you are and therefore what funds are available to support the agreed activities”. Further, 87 per cent disagreed or strongly disagreed with the statement: “[ParentsNext] has provided me with financial assistance to attend the [required] activities”. One respondent wrote: “My activity is to look at doing a TAFE course except I was told there is no funding available for one”.⁷⁰

Recommendation 5: The ParentsNext Participation Fund:

- should not subsidise the Wage Subsidy for employers;
- should be made available to clients to use for the cost of education and training; and
- should be used to support realistic and viable career pathways, rather than encouraging types of employment that will not lead to long-term financial security.

The selection of ParentsNext providers (iv)

There are a range of provider types who deliver ParentsNext under contract with the Federal Government, and it is difficult to make generalisations about their training and suitability to interact with vulnerable clients. This is itself a problem with outsourcing government programs, as demonstrated by the inconsistent and at times harmful behaviours that are reported by single mothers in relation to jobactive provider interactions.⁷¹ While the ParentsNext program has only been running nationally since July 2018 and therefore little is known about the quality of providers, an assessment of jobactive frontline staff found that their education levels were low, with only 20 per cent holding an undergraduate degree, and nearly half indicated they received no in-house training.⁷² It therefore appears that the contracting process may not adequately screen to ensure quality service delivery and a proper level of accreditation for interacting with disadvantaged and vulnerable clients.

Whilst the ParentsNext program theoretically offers a range of support services and referral options, anecdotal evidence indicates that parents are being forced to fit their personal goals within the confines of the service provider’s limited resources and networks. Further, since ParentsNext is branded as a support and referral service, it is difficult to understand what providers actually provide other than scrutiny and monitoring of women. ParentsNext is neither an

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employment agency, training centre, nor a parenting program, despite claiming to facilitate all three.

Recommendation 6: ParentsNext providers should be required to ensure that client service staff hold formal qualifications which enable them to engage effectively with their clients, including vulnerable people experiencing complex forms of disadvantage.

The measures, if any, in place to avoid causing risk or harm to vulnerable participants and their children, including participants and children who are victims and/or survivors of family violence (vii)

Accountability is focussed towards the government rather than clients

As detailed in our Submission to the Senate Education and Employment Committees concerning jobactive,⁷³ Good Shepherd asserts that providers, as private contractors, are given too much power without proper accountability structures. With its schedule of ‘outcomes payments’ made to providers rather than to the women who are making significant changes to their circumstances, the ParentsNext program appears designed to benefit providers rather than clients. As argued by the Centre for Excellence in Child and Family Welfare in their earlier commentary on ParentsNext: “Financial incentives for providers are not needed in order to achieve sustainable outcomes if the providers selected have a demonstrated commitment to supporting disadvantaged families”.⁷⁴

In Good Shepherd’s research report into the experience of single mothers who are subject to the welfare to work policy,⁷⁵ virtually all of the women who participated in the research told of ways that the requirements decreased their financial security, future prospects and immediate wellbeing, including:

- interactions with providers that involved intimidation, threats, bullying and abuse;
- payment cuts for minor infractions or errors on the providers’ part, which were then the responsibility of the individual to have reinstated; and
- compliance requirements that forced them to forego employment and study and opportunities.

These are not minor flaws in a program, but rather reflect a fundamental disconnect between the stated aims of the policy and its implementation.

Because ParentsNext mirrors welfare to work policy in that it requires engagement with a contracted provider, monitors adherence to a compliance framework, stipulates taking up ‘approved activities’ and leads to regular suspension of payments, it is also likely to be creating

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psychological and financial harm to many of the women who are participating. Further, the program appears to have the same accountability disconnect in that providers are accountable to government rather than to their clients.

Providers' interactions with vulnerable clients, including those experiencing violence

For a woman who has left a violent or abusive partner, compliance requirements can make her and her children more vulnerable to ongoing abuse while also making it very difficult for her to remain compliant. Women are more likely to experience all forms of intimate partner violence, with one in six women having experienced physical and/or sexual violence from a partner, compared to one in 16 men.⁷⁶ Many single mothers are sole parents because they have left a violent or abusive relationship.

Experiences of violence have a profound impact on women's health and wellbeing, and can lead to chronic physical or psychological impairment and ongoing trauma for both women⁷⁷ and children.⁷⁸ Intimate partner violence is defined as "a pattern of assaultive and coercive behaviours, including physical, sexual and psychological attacks, as well as economic coercion, that adults or adolescents use against their intimate partners."⁷⁹ Abuse takes many forms and is intended to humiliate, manipulate and control.⁸⁰ Economic abuse, a form of intimate partner violence, refers to behaviours that are intended to "control a woman's ability to acquire, use and maintain economic resources."⁸¹ It often presents with other forms of abuse and can continue long after the relationship has ended, thereby eroding the victims' financial security. Abusive relationships are correlated to poor overall physical health, including sleep disorders, an increase in chronic conditions, and reduced reproductive and gynaecological health. They are also linked to severe mental health effects, including experiences of post-traumatic stress syndrome (PTSD), anxiety, depression and self-harm.⁸²

Many providers do not appear to have the training, skills or the disposition required to interact with a woman who is experiencing intimate partner violence. For example, one woman who responded to the NCSMC survey said:

I have had to see a different staff member at each appointment, and have been asked to explain in extensive detail particulars surrounding family court, domestic violence etc. This is done without regard for the personal and sensitive subject [matter] involved, or the fact that it is inappropriate to discuss . . . it within hearing distance of my children. A lot of the questioning is completely irrelevant, and **none of the staff seem to have any knowledge of the family court system or domestic violence issues.** (Emphasis added)⁸³

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In a recent study, the National Social Security Rights Network found that for their clients attempting to leave family violence, the compliance requirements associated with income support made it extremely difficult for them to remain safe while also rebuilding their financial security.⁸⁴ Good Shepherd is concerned that for women who have previous or current experiences of violence ParentsNext puts them at risk of having their payments suspended due to difficulties in maintaining compliance while also remaining safe. Women escaping family violence are in crisis mode for months and at times years after leaving the relationship; there is no scope for forward planning, and a compliance-driven program like ParentsNext can increase anxiety and financial precarity.

Recommendation 7: Women who are experiencing or recovering from any form of intimate partner violence should be exempted from ParentsNext and all other compliance requirements pertaining to their income support payments.

Recommendation 8: Women who are experiencing housing insecurity, including homelessness and those in crisis and transitional housing, should be exempted from ParentsNext.

The appropriateness of the aspects of the program specifically aimed at communities with high Aboriginal and Torres Strait Islander population, and the appropriateness of the broader program for Aboriginal and Torres Strait Islander parents outside target communities (viii)

Aboriginal and Torres Strait Islander people have a long history of being targeted by forms of welfare conditionality such as the Community Development Program (CDP) scheme⁸⁵ and the Cashless Debit Card.⁸⁶ These programs have been assessed as undermining Indigenous autonomy and are therefore perceived as harmful.⁸⁷ Good Shepherd therefore does not support the forced participation of Aboriginal and Torres Strait Islander people in ParentsNext.

The intensive stream of ParentsNext is targeted in 30 areas where there are high numbers of Aboriginal and Torres Strait Islander parents. This cohort experiences a higher level of vulnerability and has different needs to non-Indigenous cohorts. This includes lower rates of education and literacy, higher rates of victimisation due to family violence, poorer physical and mental health and other effects of dispossession and colonisation.⁸⁸ Caring responsibilities for Aboriginal and Torres Strait Islander people also extend beyond the nuclear family structure while cultural and community responsibilities may limit time available for compliance activities.

Aboriginal and Torres Strait Islander parents enrolled in ParentsNext may also be experiencing other forms of targeted welfare conditionality, such as the Cashless Debit Card, which constrains

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their choices, works against the principle of self-determination,⁸⁹ and lacks a trauma-informed lens.⁹⁰

Culturally safe service responses which include an understanding of these challenges, as well as the strength and resilience of particular communities, are required to meet the needs of this cohort. If ParentsNext is retained in its current form Aboriginal Community Controlled Organisations and local program participants should be involved meaningfully in its design, its local implementation and its evaluation. Service providers must demonstrate cultural competency and ensure that referral pathways are established to support the multiple needs of the communities that they serve. It is unclear from the current list of authorised providers⁹¹ whether any of these providers reflect these principles.

Recommendation 9: Aboriginal and Torres Strait Islander parents should be exempt from mandatory participation in ParentsNext, and where ParentsNext is delivered in Aboriginal and Torres Strait Islander communities it should be redesigned through a genuine co-design process with Aboriginal Community Controlled Organisations and local Aboriginal and Torres Strait Islander program participants.

The effectiveness of the program in supporting the long-term wellbeing of parents and children, and the longer-term skills and earning capacity of parents (ix)

As detailed throughout this submission, Good Shepherd does not believe that ParentsNext in its current form is capable of achieving positive long-term outcomes for its clients. In summary, this is due to:

- the psychological distress that the compliance framework and the fear of having payments cut places on individuals;
- the lack of a tailored approach to compliance plans which means women need to add meaningless tasks even when they are already fully engaged with study, employment and/or parenting activity;
- the low amount of, and in many cases the lack of availability of, the Participation Fund;
- the inability of most providers to successfully engage with vulnerable clients with complex needs, including experiences of intimate partner violence;
- the focus on taking up precarious forms of employment;
- the misdirection of ‘outcomes payments’ to providers rather than to clients, and the way that payments skew provider decision-making processes;
- the targeting of individuals for automatic enrolment into ParentsNext when such an intervention may not be appropriate for their circumstances; and

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- concerns that the program is breaching Australia’s human rights obligations (discussed in Section 5, below).

Of particular pertinence to the question of long-term program effectiveness is the diversity of the single parents that ParentsNext seeks to serve. In our work with clients, many from low socio-economic status households and many who are recent arrivals, we see the daily and long-term impact that financial insecurity has on women and their families. For such women, who are of particular interest to ParentsNext in order to reduce the risk of intergenerational poverty, the program’s model is largely inappropriate. Our case workers tell us that the women they see are kept in a state of financial distress and housing precarity by a combination of systemic and individual/familial factors, making it impossible for them to move out of a crisis or transitional mode. For example, one client is a young mother with young children living in transitional housing, and is unable to plan for entry into the labour market as she does not know what area she will be living in the longer term, and what child care and transportation infrastructure there may be to support her to access and retain a job. For the ParentsNext program to be useful to many of clients, more foundational needs must first be met.

At the other end of spectrum, case studies collected by the National Council of Single Mothers and their Children and Council of Single Mothers and their Children (Victoria) show that many ParentsNext participants are those who are already undertaking university degrees and/or some employment, and that mandated activities framed as assistance is experienced as a burden and a hindrance to achieving financial security.⁹²

In summary, as it is currently conceived ParentsNext appears to be designed as a one-size-fits-all model, with little flexibility to cater to individual circumstances or needs. With a compliance-driven approach, emerging evidence suggests this model is experienced as controlling rather than enabling in terms of a long-term positive trajectory.

Best practice pre-employment programs for parents (x)

Preparing future workers for entry in the labour market through skill development is critical, particularly for young people who have left school early. The OECD notes that the return on education and skill development is greater when students are younger, and that it is difficult to overcome barriers due to knowledge and skills gaps through later participation in labour market programs.⁹³ However, there is a limited evidence base on the effectiveness of such programs in relation to single mothers. Initial results from the NCSMC survey indicate that viable assistance to prepare for future employment would be welcomed by many women. When asked what kind of program would best suit their needs, 84 per cent agreed or strongly agreed that “no program but access to funds to undertake my chosen activities” would be helpful.⁹⁴

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One way to increase the effectiveness of pre-employment programs is to encourage joint learning across providers. We understand that opportunities to develop and share best practice among ParentsNext providers are limited to voluntary local networks of providers who meet to discuss the implementation of the program (as documented prior to the expansion).⁹⁵ As these networks are voluntary and lack central coordination and accountability they are limited in their potential to drive program improvements. A formal mechanism to share best practice among providers which is linked to performance and reporting requirements would facilitate continuous quality improvement. Further, providing a venue for client feedback, for example a ‘lived experience panel’ or anonymous feedback on services, could assist providers to learn and adapt to client needs.

Recommendation 10: Develop formal mechanisms for ParentsNext providers to exchange knowledge, including the provision of forums to engage meaningfully with clients to leverage their insights to improve service delivery and long-term outcomes.

It may be, however, that changes in social policy are likely to have greater impacts on single parent employment rates than support programs that encourage individual change. As with child outcomes, research indicates that a strong social safety net is the best intervention to both reduce long-term poverty in single parent households and support re-engagement with employment. An analysis of both targeted and universal policies across 18 affluent democracies⁹⁶ finds that universal programs out-perform targeted programs for addressing single parent poverty, and these programs often include complementary supports universal subsidised child care, paid parental leave, and a tax-free child allowance. Australian research shows that single mothers with higher child support payments are both *more likely* to enter the workforce and *work more hours* than single mothers on low payments.⁹⁷ This research suggests that providing a higher baseline of monetary and time resources for single parents will enable a higher rate of engagement in the labour market.

5. Term of Reference C – the Targeted Compliance

Framework its impact on participants

As with concerns raised regarding jobactive providers, the financial incentives that are built into the ParentsNext model encourage providers to push clients towards certain outcomes regardless of the clients’ circumstances.⁹⁸ The ‘outcomes payments’ that are offered to providers likely interfere with ParentsNext participants’ autonomy to address their dual interest in supporting the wellbeing of their children and securing long term financial security. It is noteworthy that many providers⁹⁹ as well as Jobs Australia¹⁰⁰ have called for the de-coupling of ParentsNext from the Targeted Compliance Framework.

Welfare conditionality is ineffective

An underlying problem with ParentsNext is that participation is compliance-focussed, and that support is conditional. The program has been developed in line with a shift in Australia and countries such as the United States and the United Kingdom towards welfare conditionality in the provision of social security. More commonly referred to as ‘mutual obligation’ in the Australian context, the term refers to the linking of the right to social security with compulsory obligations such as job search and other compliance activities. However, longitudinal evidence collected in the United Kingdom shows that a harsh regime of welfare conditionality is largely ineffective and rarely results in shifts from income support into secure employment.¹⁰¹

In research that Good Shepherd published last year, single mothers explained that compliance requirements associated with the jobactive program often perversely forced them to forego paid employment, educational opportunities, or parenting activities.¹⁰² Compliance is often itself a major barrier to achieving viable employment and/or important milestones in other domains.

Conditionality negatively affects health and wellbeing

In addition to interfering with attempts to achieve financial security, there is little evidence to support the notion that punitive social security policies can improve health and wellbeing of single parents. Rather, the evidence indicates that these policies are damaging to “self-worth, self-esteem and quality of life”.¹⁰³ An Australian study found that 45 per cent of individuals subjected to compliance policies also experienced very high levels of psychological distress, which interferes with the capacity for long-term planning and effective engagement with employment.¹⁰⁴ Good Shepherd’s interviews with single mothers interacting with jobactive found that many women were anxious and hypervigilant; they self-policed their behaviour as they were afraid of payments being cut suddenly if they stepped out of line.¹⁰⁵

Conditionality is at odds with Australia’s human rights obligations

A number of human rights protections support the entitlement of parents to social security. All people have a right to family life, an adequate income and social security, while mothers are entitled to special protection under Australia’s obligations as a signatory to the International Covenant on Economic, Social and Cultural Rights (ICESCR).¹⁰⁶ In a review conducted by Marque Lawyers,¹⁰⁷ they state:

There are strong arguments that the legislative regime that implements this program [ParentsNext] is not compatible with key rights and freedoms listed in the Human Rights (Parliamentary Scrutiny) act 2011. The program effectively limits the rights to receive social security and an adequate standard of living. The Statement of Compatibility with Human Rights . . . does not adequately justify the legitimate

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objective for linking the program with parenting payments. Consequently, it is arguable that the program unfairly burdens human rights in breach of the Australia's international convention obligations.

Good Shepherd is particularly concerned about the pressure placed on women to sign a privacy waiver in order to access social security payments and the way this undermines informed consent. The waiver reads in part: "If you do not provide some or all of your personal information, the Department may not be able to provide you with appropriate services and assistance."¹⁰⁸ After explaining that this information may be shared both with other government departments and third parties, it goes on to state: "In order to provide you with services and assistance, your ParentsNext provider may collect sensitive information, which is a type of personal information." Nowhere on the form does it state that signing the waiver is optional. There is anecdotal information that women are being told by providers that they must sign the waiver or their payments will be stopped.¹⁰⁹ It has been reported that women with experiences of violence from former partners fear signing the privacy waiver as sensitive information about their children, including details of their schooling and their addresses, could be accessed by third parties.¹¹⁰

The United Nations Special Rapporteur on Extreme Poverty and Human Rights has condemned the social security reforms enacted by the Australian Government because they are specifically targeting single parents and are pushing them and their children into poverty.¹¹¹ As a form of welfare conditionality that withholds payments, it has been argued that ParentsNext intrudes on the human rights of sole parents.¹¹² ParentsNext is an extension of previous social security reforms, and in its implementation appears to be increasing financial insecurity for single mothers with very young children. Good Shepherd is therefore concerned that ParentsNext, with its specific focus on single mothers, is discriminatory and in breach of Australia's human rights obligations.

As noted earlier in this submission, ParentsNext also specifically targets Aboriginal and Torres Strait Islander communities. The Australian Human Rights Commission has repeatedly stated that the rights of Aboriginal and Torres Strait Islander people are regularly breached by targeted government policies.^{113 114} Restrictive income support policies, such as the Cashless Debit Card, target and disproportionately impact on Aboriginal and Torres Strait Islander individuals and communities. In restricting access to welfare payments, the Cashless Debit Card appears to breach Australia's commitment to refrain from racial discrimination.¹¹⁵ ParentsNext's focus on Aboriginal and Torres Strait Islander individuals and communities may also mean it is also failing the test of proportionality.

Good Shepherd supports the framing of access to social security as a human right and does not support the withholding of payments due to conditionalities or non-compliance with what is described as a support program.

Recommendation 11: ParentsNext should be de-linked from the Targeted Compliance Framework and be replaced with a voluntary, person-centred approach to program participation.

6. Term of Reference E – any other related matters

ParentsNext does not exist in a vacuum and should not be viewed in isolation from other policy and program supports for parents combining employment and child rearing. General employment and child care policies reduce structural and cultural barriers to labour market participation and help all parents reconcile the demands of paid work and family life. It is also necessary to revisit current policy in relation to child support, which is often unavailable to single parents.^{116 117}

As noted in section 3, ParentsNext participants are already undertaking a heavy unpaid workload with the care and associated housework that comes with infants and young children. Income support from social security and the tax and transfer system is one critical way to redistribute the cost of child rearing and improve economic security for individual parents. Support for parents to combine paid work and unpaid caring work can be provided through several policy instruments. These include: strengthening paid parental leave, including improving dad and partner pay to encourage more men into unpaid caring work; workplace-based flexible work arrangements; strengthening right to request flexible work provisions, including an enforcement mechanism; improving access to child care, including through increased subsidies and greater availability outside of regular working hours; measures to improve gender pay equity through the industrial relations system; strengthening rights and protection for casual workers; and greater regulation of the on-demand economy.

7. Conclusion

Good Shepherd supports the stated objectives of ParentsNext and recognises the value of pre-employment programs to address disadvantage by supporting people to enter the labour market. However the design and implementation of ParentsNext is based on several flawed assumptions about women, parenting and work, while emerging evidence suggests it does little to support parents of young children to engage meaningfully in employment.

As explored throughout this submission, our key objections to ParentsNext centre around: its focus on parents of infants and very young children; its disconnect with the current labour market and the employment challenges unique to mothers; the linking of program participation with income support, including the authority of private contractors to suspend payments for non-compliance; inflexibility in program delivery resulting in a poor service experience for clients; and its overreach into the family life of participants by mandating parenting activities with no relevance to labour market outcomes. We are also concerned that ParentsNext undermines Australia's human rights obligations with respect to single mothers and Aboriginal and Torres Strait Islander people.

There is potential for ParentsNext to be redesigned to provide genuine assistance to mothers with young children to increase their employability if it is structured in a way that enables rather than punishes them through a one-size-fits-all approach and compliance-driven activities. A voluntary program that incorporates tailored, holistic support which is coupled with an increase in the level of income and other supports, would achieve better outcomes for single mothers and their children.

8. Endorsements

This submission is endorsed by the following organisations:

- National Foundation for Australian Women
- Domestic Violence Victoria.



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