

Submission to the Senate Community Affairs Legislation Committee Inquiry into the Social Security (Administration) Amendment (Income Management Reform) Bill 2023

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I thank the Committee for their willingness to take a late (and brief) submission to this Inquiry. In its first year the Albanese government is embarking on an ambitious reform agenda which is laudatory but also taxing on those of us who want to provide considered input to new policy and law making often to very tight timeframes.

I have opposed income management as a social policy instrument since 2007 when first introduced as an element of the NT Intervention on several grounds outlined in evidence provided to the Senate Standing Committee on Legal and Constitutional Affairs *Inquiry into the Provisions of the Northern Territory Emergency Response Bill 2007 and Associated Bills*. Rather than rehearse my concerns again, at Attachment 1 I provide my submission to this Committee's earlier Inquiry into the Social Security (Administration) Amendment (Repeal of Cashless Debit Card and Other Measures) Bill 2022 (Submission no. 37, August 2022).

I do want to reiterate from that submission that while the incoming government made a commitment to make income management voluntary for those 'individuals or communities' who so desire, it now appears to yet again be hedging its bets with a flexibility built into the current Bill that could facilitate the compulsory movement of welfare recipients onto an enhanced income management regime. This is despite a statement on the opening of the 47th parliament on 26 July 2022 by the Governor-General noting that the Albanese government is committed to abolishing compulsory income management and the cashless debit card. The latter commitment has been met, but it is now proposed that the former remains under the guise of the enhanced income management (eIM) regime using a new SmartCard.

Focusing on the Second Reading Speech of the Minister for Social Services on 9 March 2023 the eIM regime and SmartCard (with the SmartCard already being utilised by some from 6 March 2023) is focusing on technical issues only. The Minister notes that the Bill does not **remove the income management program or amend the underlying policy** (my emphasis) that looks to apply restrictions to an individual's welfare payment when they meet specific eligibility criteria. In other words, the government's commitment to make income management voluntary rather than compulsory has been forsaken for now: thousands of Indigenous people in receipt of welfare payments in the NT since 2007 will remain on compulsory income management, while a relatively small number of individuals in the five Cape York Welfare Reform Trial communities deemed 'irresponsible' by the Families Responsibility Commission and in need of income management will also be compulsorily subject to the eIM regime.

It is far from clear why a complex legal framework is being put into place to ensure the continuation of a problematic policy framework that has incrementally evolved over the

past nearly 16 years. There seems to be one dominant and often asserted program logic that income management will improve the expenditure patterns of welfare recipients and that this will have a range of beneficial social and economic outcomes—if you like income management will operate to ‘responsibilise’ welfare recipients subject to the regime. This was the logic behind income management in the NT since 2007 and informing the now defunct Cashless Debit Card ‘trials’ 2016–2022. In the Cape York Welfare Reform trials, a somewhat different logic and far more discretion is evident: the Families Responsibilities Commission (inclusive of community members) imposes income management as a punitive measure of last resort if income support recipients are deemed to be behaving irresponsibly.

The problem with both these logics is that there is no evidence that they are making a difference. I am not proposing to rehearse the multiple studies that have been undertaken seeking to assess the impact of income management on those individuals subject to the regime and their communities. This task has been undertaken for the Committee very thoroughly by my colleagues at the ANU Professor Matthew Gray and Dr Rob Bray in submission no.3 to this Inquiry. I will only add to this that analysis I have undertaken of ABS community profiles data over the period 2006 to 2021 for the five communities participating in the Cape York Welfare Reform trial shows no discernible improvement in the socioeconomic wellbeing of Indigenous residents of these communities. Not only is there no credible evidence that income management has made a positive difference, but there is also some worrying evidence summarised by Gray and Bray that it might have been harmful. And it has been extremely expensive as demonstrated most recently in research for the ANAO by the Centre for International Economics (June 2021) showing a cost to benefit ratio of six, that is \$6 of expenditure on income management generates \$1 of measurable benefit.

Another policy problem that is not being addressed is why it is Indigenous Australians that are being targeted by this policy. Historically income management was an element of the Northern Territory Emergency Response Intervention that is now widely discredited for being partially responsible for increasing rather than reducing socio-economic marginalisation of Indigenous people in the NT. Income management then expanded elsewhere, but only in the case of the Cape York Welfare Reform Trial on a fully discretionary basis, with that discretion vested in the Families Responsibilities Commission not individuals. As income management has spread elsewhere it has disproportionately focused on Indigenous Australians. This has raised valid human rights concerns expressed on several occasions now by the Parliamentary Joint Committee on Human Rights (including in its Report No.4/2023 about this Bill) and summarised very thoroughly in submission no.4 to this inquiry by Dr Shelley Bielefeld.

As a modicum of discretion is being incrementally introduced to the operations of income management, most notably by allowing those caught in the compulsory Cashless Debit Card net since 2016 to exit the scheme in 2022 (which almost all have done) those in the NT that were originally subject to blanket race-based income management remain without a current exit option.

In my view the current Bill is looking to deliver a technological fix, the SmartCard, to an incoherent policy framework that has expanded and then contracted since 2007. The

government is looking to use one platform to encapsulate three residual and quite different policy goals (irrespective of their effectiveness). The first is the extant **compulsory** income management regime in the NT that is punitive and imposed irrespective of behaviour or expenditure patterns. The second is the Cape York Welfare Reform trials where there is **discretion** exercised by the Families Responsibilities Commission that is contingent on behaviour; unlike in the NT there is ready possibility to exit income management after a short period. And finally, the income management regime operates on a **voluntary** basis whereby individuals choose to have their income managed as a financial management instrument to assist in budgeting. It is only in the case of the last that there is some evidence of benefit from income management.

The current government needs to untangle the different logics and applications of income management. At present it is persisting with a regime that is disproportionately targeting Indigenous people raising the potential opprobrium that it is discriminatory at the very time when the government is looking to empower Indigenous Australians with a constitutionally embedded advisory voice to the parliament and executive. Alternatively, historic NT injustice and Cape York exceptionalism aside, the government in this Bill is expanding options for States and Territories to refer individuals for income management (the example as a child protection measure is provided by the Minister) to dilute its appearance as being First Nations focused. I note that in her second reading speech the Minister makes specific mention of the need for more consultations with First Nations community leaders. This at once implicitly acknowledges that the Bill is more about Indigenous Australians who are on welfare than others. But it also raises the issue of why this has not occurred already before the Bill has been tabled in the Parliament given that the government had already committed to an income management reform process when in opposition.

Historically, the Kevin Rudd and then Julia Gillard Labor governments acquiesced to the income management policy initiated by the Howard conservative government and even enhanced this regime in 2010 and 2011. The Labor opposition under Bill Shorten and Anthony Albanese was ambivalent about the Cashless Debit Card introduced by Tony Abbott in 2016 on a trial basis, initially acquiescing and then opposing it. It is time in my view for the current government to develop its own policy position on income management rather than merely responding to regimes enacted by others. One possibility might be for the government to consider making SmartCard available to all welfare beneficiaries on a voluntary basis, although this will have cost implications that need to be considered. Others might be to commit the considerable funding expended on income management to other more constructive policies to (and I quote the Minister here): ‘... to empower people, empower communities, and provide individuals and communities with a range of support that they can **choose** to use when and how it best suits them’ (my emphasis).

I want to make just two recommendations that are important to consider to ensure the Bill’s rationale and legitimacy.

First, I note that the Australian Greens have proposed amendments to the Bill (on 27 March 2023) that will provide a mechanism for exiting compulsory income management and that will require open disclosure of the cost of the regime. In my view these proposals are essential if the scheme is to retain any credibility. Moreover, they could help remove some

of the long-standing opprobrium associated with the non-discretionary (compulsory) Indigenous-focused income management regime still operating in the NT. That opprobrium has deep significance in undermining trust among many NT Indigenous citizens about the legitimacy and intentions of the Federal government.

Second, and most importantly, there is no doubt that given its failure to deliver beneficial outcomes to date the broad income management policy paradigm needs a radical rethink. Under such circumstances, in my view this Bill must have a short-term sunset clause when many of its contentious logics can be properly assessed. A short-time frame will ensure that the issue of income management gets urgent policy attention a decade and a half after it was introduced without any policy logic as an element of the Northern Territory Emergency Response Intervention.

To conclude, I am acutely aware that policy path dependency and investment in the expensive debit card instruments like the BasicsCard, the Cashless Debit Card and now the SmartCard can hinder social policy reform even when all the evidence indicates it is needed. The incoming Albanese government took one step to fulfill its commitment to abolish the Cashless Debit Card in 2022. It now needs to take the next step to make income management available on a voluntary basis, except perhaps in some extreme circumstances, although in such circumstances it is difficult to see how income management alone will address them. For example, the proper regulation of alcohol is a difficult issue that income management alone will not resolve. There is both financial and opportunity costs associated with prolonged policy and highly politicised debate about income management. The financial cost is that it is expensive to implement and monitor. The opportunity cost is that it is diverting policy making focus from many other issues that need to be addressed that are perpetuating First Nations people's impoverishment and deep socioeconomic disadvantage.

Submission to the Senate Community Affairs Legislation Committee Inquiry into the Social Security (Administration) Amendment (Repeal of Cashless Debit Card and Other Measures) Bill 2022

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I would like to thank the Committee for inviting me to make a submission to this rapid-fire inquiry on Thursday 4 August 2022; and for providing me with an additional two days beyond initial submissions deadline until 12 August 2022 to complete my submission.

I note that the *Social Security (Administration) Amendment (Repeal of Cashless Debit Card and Other Measures) Bill 2022* (henceforth 'the Repeal of CDC Bill') was introduced in the House of Representatives on 27 July 2022; and there was truncated debate on the Bill in the Senate on 4 August 2022. I strongly endorse the decision of the Selection of Bills Committee to refer the Repeal of CDC Bill to this Committee for Inquiry because 'it is a complicated issue with huge ramifications for vulnerable communities' and it is important that stakeholders are given opportunity to speak to the draft legislation and that this Committee 'properly consider its impacts on people subjected to compulsory income management, particularly in the Cape York region and in the Northern Territory'.

By way of brief background, I have worked as a university-based academic researching Indigenous economic development issues, focusing especially on regional and remote Australia. By my count, I have made eight submissions since 2007 to parliamentary inquiries that have examined aspects of income management as well as making submission to the Northern Territory Emergency Response Review in 2008 (see Attachment A). As well as being on the parliamentary record (alongside provided verbal evidence as an invited witness on several occasions) I have also published a few of my submissions as well as articles on income management to ensure both wider engagements and peer review.

At the outset I want to be quite transparent that since 2007 I have opposed any form of compulsory, non-discretionary or blanket income management on several grounds. First, as I noted in 2007 international comparative evidence available suggests that any attempt to control welfare spending is likely to have high costs and limited benefits. Second when income management was first introduced in August 2007 by the Howard government under the Northern Territory Emergency Response and Associated Bills it targeted Indigenous people only and so was discriminatory requiring the suspension of the Racial Discrimination Act: it was assumed that all Indigenous people who are welfare recipients are feckless spenders whose incomes must be quarantined and controlled. This is a form of racial profiling that I find unacceptable. While from 2010 New Income Management was nominally no longer racially discriminatory because it included some non-Indigenous people in the NT and then elsewhere, effectively it continues to mainly be targeted at Indigenous people as noted on a number of occasions since 2011 by the Parliamentary Joint Committee on Human Rights. Finally, despite numerous reviews by independent academic researchers and consultants as well as the Australian National Audit Office there is no unequivocal

evidence that either compulsory or voluntary income management programs have generated demonstrable positive outcomes; and much research that includes the voices of those impacted directly by income management are clear that outcomes for them have been negative. Evaluations have failed to demonstrate a clear rational connection between cashless welfare and the intended positive harm minimisation objectives of such programs, a process that is not helped by the continual shifting of intended outcome goalposts.

At the outset let me make two overarching observations that are of relevance to any consideration of the CDC Repeal Bill.

First, there have been two waves of social policy reform that has introduced two cosmetically, administratively, and technically different but fundamentally similar forms of income management in Australia, both mainly targeting Indigenous people. The first initially referred to as income quarantining and now income management (and for a time from 2010 as New Income Management) began in 2007 in the NT as a key element of the NT Intervention and focused only on Aboriginal people residing in prescribed communities. Subsequently in 2008 it was extended to four Cape York Welfare Reform Trial communities but on a discretionary basis with decision-making powers with the Families Responsibility Commission. Subsequently from 1 July 2012 place-based income management was introduced to five localities in four States. Income management has operated for 15 years now; on 1 July 2022 there were 24,185 people on income management, most (93%) in the NT.

The second wave initially referred to as the Healthy Welfare Card was recommended in *Creating Parity* the Forrest Review of Indigenous Employment and Training to manage 100 per cent of income for all welfare recipients. It was adopted as the Cashless Debit Card Trial by the Abbott and Turnbull governments initially for a limited period at a maximum of three sites. At that time in an opinion piece in the *ANU Reporter* (Volume 47 Number 1) I asked: 'Will the Healthy Welfare Card be healthy?': I was mainly concerned that the Forrest Review had taken no account of completed evaluations of income management in the NT that questioned the demonstrable efficacy of this blanket instrument delivered at great cost.

Subsequently, this scheme has been rebadged from 2017 as the Cashless Debit Card (CDC) program operating at six sites. on 1 July 2022 there were 17,795 on the CDC program across three States and the NT. All told there are an estimated 41,980 welfare recipients across Australia being whose income is managed, less than 1 per cent of 4.6 million Australians who are estimated by the Australian Institute of Health and Welfare to receive some form of income support from government.

Second, income management has been closely linked to employment programs. Under the first wave when the Howard government found that it could not quarantine the incomes of people who earned wages under the Community Development Employment Projects scheme in the NT it set about reforming this scheme, that eventually terminated in July 2015. And the only other major recommendation from the Forrest Review that the Abbott government implemented from July 2015 was the adoption of a recommendation for major reform of mutual obligation for the unemployed. The Community Development Program (CDP), the Abbott government response, initially required the unemployed in remote

Australia to participate 5 hours a day five days a week in work-for-the-dole or training; over 80 per cent of the unemployed caught in the CDP net were Indigenous people. The CDP was extremely punitive being far more effective in fining the unemployed for non-participation than in creating jobs. From May 2021 the Morrison Government set out to reform this program making mutual obligation requirements less onerous and exploring options to fundamentally revise the program.

These two observations have party partisan implications. While what is now called the Income Management program has had bipartisan (Coalition and ALP, always opposed by the Australian Greens) support since 2007, the CDC program has been a Coalition initiative that was originally supported as a short-term trial at three locations by the ALP. The ALP has been subsequently opposed the CDC trials from 2017 for a variety of reasons including that the evaluations completed could not demonstrate that the expensive CDC trials, costing over \$100 million to date, were generating demonstrable (as distinct from anecdotal) positive outcomes.

A further connection between income management and employment is that the primary means to avoid compulsory income management is either to get a paid job or forgo income support and engagement with the social security system (thus becoming an additional liability on already impoverished households and families). An issue here is that for many Indigenous people living remotely who are receiving income support and subject to compulsory income management (so called long-term welfare payment recipients and disengaged youth in particular) there are no or very limited employment opportunities where they live—some have been on income management for 15 years, some for all their adult working life.

It is no surprise that the Albanese government has moved quickly on its Indigenous affairs election policy commitment to end the CDC program. This commitment certainly received considerable added weight when the latest ANAO *Report Implementation and Performance of the Cashless Debit Card Trial — Follow On* was published on 2 June 2022 (just after the election). The ANAO report is frankly damning of the CDP program documenting that not only is there no evidence that the program is providing beneficial outcomes, but also that there is an inadequate evaluation framework in place to gauge the success or failure of the trial/program. In particular, the ANAO noted that ‘contrary to legislative requirement the evaluation of the CDC program was never reviewed by an independent expert’ (p.72, my underlining). Furthermore, a cost-benefit analysis undertaken by the Centre for International Economics completed in June 2021 at considerable cost was never made publicly available because one suspects its analysis showed that the CDC program delivered a benefit-cost ratio of 0.16, that is for every \$6 of expenditure it delivered \$1 of estimated benefit.

The program may have benefited some people, but there is a general sense that it has been an expensive failure of social policy that has failed to deliver on its objectives that were pared back in December 2020 to demonstrably reduce expenditure on alcohol, gambling, and illegal drugs; to support program participants with their budgeting strategies; and to encourage socially responsible behaviour.

It is noteworthy that this is not the first time that the ALP has sought to end the CDC trial; it opposed it from mid-2017 and most vigorously in December 2020 as the Morrison government looked to extend the life of the program to make it permanent, expandable to include more and more participants without requirement for any evaluation. The Social Security Administration Amendment Bill 2020 passed through the Senate by just one vote (former Senator Stirling Griff having the deciding vote). It was in the aftermath of this Bill that the nomenclature for the CDC 'trial' with connotations of evaluation and a limited life changed to the CDC 'program'. The 2020 Bill was heavily amended after a parliamentary inquiry by this Committee and the program is currently due to end on 31 December 2022. Arguably the Repeal of CDC Bill will merely hasten the demise of the CDC arrangement by at most two months for those who apply to the Secretary of the department of Social Services for early exit. (This is an option that historically has been attempted by 4716 persons who have sought to demonstrate reasonable and responsible management of their affairs, with 699 or 15 % successful; only 83 or 1.8% of successful exits have been by Indigenous persons.)

But repealing (or abolishing) the CDC program is proving to be more complicated than the government might originally have expected.

One option available is to just do nothing and so allow the 31 December 2022 expiry date to mark the demise of the CDC program. The problem with this 'do-nothing' option is that it will exclude those who have voluntarily embraced the CDC program from access to income management and the government appears concerned to retain this voluntary option. The Explanatory Memorandum also indicate that there are some who receive income support (vulnerable welfare payment recipients and supporting people at risk) over whom the government would like to retain some form of compulsory income management.

A further complication which one suspects the government did not anticipate is that a high proportion of the 18,000 people on the CDC have accessed 'buy-now-pay-later' schemes, with the most popular Afterpay *allowing consumers* to buy now and pay later in four instalments over 6 weeks with no interest and no fees if payment is made on-time. Media reports do not reveal their sources but indicate that between 50 and 80 per cent of people on the CDC program might have outstanding debts with buy-now-pay-later firms. This means that the program cannot be closed overnight to ensure that there are no outstanding debts. It is unclear to me which of the CDC program's positive objects 'to support program participants with their budgeting strategies or to encourage socially responsible behaviour' allowed a high proportion of impoverished people on the CDC program to access such 'buy-now-pay-later' schemes that can trap the unwary into debt.

Paradoxically, to end the CDC program in an orderly manner the Repeal of CDC Bill looks to extend the life of the CDC program beyond its current end date of 31 December 2022 to ensure an orderly close and the transfer of some to income management over a period of up to six months.

Equally paradoxically, and more worryingly, those who want to stay on the CDC program on a voluntary basis because they want a fee-free debit card that quarantines 80 per cent of their welfare income and prohibits spending on alcohol, gambling and illegal drugs or access

to cash; and pays 1 per cent interest on balances (the Indue card and Traditional Credit Union card in the NT only) will need to move to the income management program and use the BasicsCard. The BasicsCard is regarded as inferior (the terms ‘clunky’ and ‘outdated’ have been used by some including Senator Ruston) to the card available under the CDC program that operates as a Visa debit card accepted by a far wider range of merchants than the BasicsCard. The paradox is that over the last 18 months the option heavily promoted by the Morrison government for those on income management (mainly in the NT) to switch from the BasicsCard to the Indue or TCU card has been taken up by over 4,000 on compulsory and voluntary income management in the NT; and by the Families Responsibilities Commission on behalf of over 100 income support recipients referred by it to income management at four Cape York ‘trial’ communities and at Doomagee. Having moved from the inferior BasicsCard to the superior Indue/TCU card some who are on compulsory income management will need to move back to the inferior card.

Finally, and perhaps most importantly, is the unresolved issue of what the Albanese government plans for those on compulsory income management most of whom reside in the NT—on 1 July 2022, 87 per cent of all on the income management program lived in the NT. It was reported earlier this year that the ALP was committed to make income management in the NT voluntary. While the government made a commitment to make income management voluntary for those ‘individuals or communities’ who so desire, it now appears to be hedging its bets with a flexibility built into the Repeal of CDC Bill that could facilitate the movement of those on the CDP program onto income management. And yet on the opening of the 47th parliament on 26 July 2022 the Governor-General noted in his delivered speech that under the Albanese government the Community Development Program, compulsory income management and the cashless debit card will all cease.

Just when compulsory income management in the NT (and elsewhere) will cease is an important issue that should be addressed by this Inquiry. It has already been noted in the Senate on 4 August 2022 by Senator Jacinta Price that only Territorians will be subject to compulsory income management: ‘So it is alright for blackfellas in the Territory but not for anyone else in the country! This is creating two classes of people in this nation’. Later she notes ‘Perhaps this government is racist—because they are suggesting it’s alright for blackfellas in the Northern Territory but it’s not alright for the rest of Australia’. This is a view that is also expressed by Senator Lidia Thorpe who notes that the cashless debit card is racist. ‘It’s a form of oppression on First Nations People in this country’. It is also a view raised time and again by the Parliamentary Joint Committee on Human Rights, most recently in Report 1 of 2021 where it notes that Indigenous people constitute 40 per cent of those on the CDC program and 81 per cent of those on the income management program but constitute less than 4 per cent of the total population.

The government needs to clarify as quickly as possible if it will abolish compulsory income management alongside the abolition of the cashless debit card. The risk in not doing so is to indicate that the discriminatory exceptionalism that has been a feature of Indigenous policy in the NT over the last 15 years and that many find demeaning will continue. All the criticisms that have been made of the CDC program are equally applicable to the compulsory income management program: there are quite a few evaluations, many summarised in a research paper by J Rob Bray in 2016 *Income Management Evaluations*—

What Do We Know? and in several informative Bills Digests published by the Parliamentary Library and detailed reports by the ANAO that indicate that there is no demonstrable evidence of positive outcomes from the income management program that has cost over \$1 billion since 2007. It might be timely for the new government to be decisive in abolishing the compulsory component of the income management program. This has attracted much criticism from the Parliamentary Joint Committee on Human Rights over recent years (most recently in Report 1 of 2021) as being inconsistent with Australia's human rights commitments as well as inconsistent with the free prior and informed consent and self-determination principles in the United Nations declaration on the Rights of Indigenous Peoples that Australia has supported since 2009.

Let me end this submission by making some summary observations for this Committee's and the government's consideration:

- While I support the passage of the Repeal of CDC Bill, I share the various and serious concerns articulated by the Scrutiny of Bills Committee.
- It is especially important that income management is viewed holistically especially as the CDC program and the income management program are now interlinked in the NT and five sites in north Queensland.
- The development of a voluntary and personally customised income management regime whereby a free debit card is provided to any welfare recipient who seeks one with a sought portion of income quarantined for expenditure that excludes alcohol, gambling, illegal drugs and possibly tobacco products could be considered.
- Provision of such a voluntary debit card could have financial implications for government, especially if it proves popular with welfare recipients: information in the latest ANAO Report indicates that the CDC in 2020–21 cost in the vicinity of \$2,000 per participant per annum.
- The government might want to consider the possibility of maintaining some form of compulsory income management in some exceptional circumstances, as currently occurs in the Cape York Welfare Reform system, but it is imperative that no category of Australian citizen, whether classified by identity, race, or place of residence, is deemed in need of blanket, discriminatory compulsory measures.
- It is time for a comprehensive re-think of social policy that aims to assist welfare recipients to better manage their financial affairs if they themselves perceive this as a challenge that requires assistance from government.
- At the very moment when an inquiry into the applicability of the United Nations Declaration on the Rights of Indigenous Peoples to Australia has been referred to the new Parliamentary Joint Committee on Indigenous Affairs careful consideration needs to be paid to the human rights implications of both passing the Repeal of CDC Bill and retaining any form of compulsory income management that disproportionately targets First Nations people.
- At a time when the new government is considering a constitutional referendum so as to more effectively and permanently allow Indigenous voices to influence policy that targets First Nations peoples, consideration needs to be given to the continuation of exceptional compulsory income management in the NT. This is a policy legacy of the NT Intervention in 2007 and its aftermath including Stronger Futures in the NT laws passed by the Gillard government in 2012.

Attachment A

1. Altman, J.C. 2007. Opening comments (invited speaker) to Senate Standing Committee on Legal and Constitutional Affairs *Inquiry into the Provisions of the Northern Territory Emergency Response Bill 2007 and Associated Bills* (subsequently published as *CAEPR Topical Issue No. 13/2007*)
2. Altman, J.C. 2008. Submission to The Northern Territory Emergency Response Review, (subsequently published as *CAEPR Topical Issue No. 10/2008*).
3. Altman, J.C. 2008. Submission to the Inquiry into the *Family and Housing, Community Services and Indigenous Affairs (Emergency Response Consolidation) Bill 2008*.
4. Altman, J.C. 2010. Submission to Senate Standing Committee on Community Affairs Inquiry into Indigenous Welfare Reform and Reinstatement of the *Racial Discrimination Act*, submission no. 50 (subsequently published as 'Income Management and the Right of indigenous Australians to Equity', *CAEPR Topical Issue No. 03/2010*).
5. Altman, J.C. 2012. Submission to the Senate Community Affairs Standing Committee Inquiry into the Stronger Futures in the Northern Territory and Social Security Amendment Bills 2011, Submission No. 360.
6. Altman, J.C. 2012. Submission to the Parliamentary Joint Committee on Human Rights Examination of legislation in accordance with the *Human Rights (Parliamentary Scrutiny) Act 2011* Stronger Futures in the Northern Territory Act 2012 and related legislation, Submission No 6.
7. Altman, J.C. 2017. Submission to the Senate Standing Committee on Community Affairs Legislation Committee Inquiry into the Social Services Legislation Amendment (Cashless Debit Card) Bill 2017, submission no. 53, October 2017.
8. Altman, J.C. and F Markham 2019. Submission to the Senate Standing Committee on Community Affairs Legislation Committee Inquiry into the Income Management to Cashless Debit Card Transition Bill 2019, submission no. 88, October 2019.
9. Altman, J.C. 2020. Submission to the Senate Standing Committee on Community Affairs Legislation Committee Inquiry into the Social Security (Administration) Amendment (Continuation of Cashless Welfare) Bill 2020 submission no. 106, October 2020.