



5 March 2010

Senator Claire Moore

Chair

Senate Community Affairs Committee

Via email: [Community.affairs.sen@aph.gov.au](mailto:Community.affairs.sen@aph.gov.au)

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Dear Senator Moore,

**Additional submission to the Social Security and Other Legislation Amendment (Welfare Reform and Reinstatement of Racial Discrimination Act) Bill 2009, Families, Housing, Community Services and Indigenous Affairs and Other Legislation Amendment (2009 Measures Bill) 2009 and Families, Housing, Community Services and Indigenous Affairs and Other Legislation Amendment (Restoration of Racial Discrimination Act) Bill 2009**

At a recent appearance by the National Welfare Rights Network (NWRN) at the public hearings of the inquiry, we were asked to respond to a question on notice as to whether the evaluation which is proposed to be undertaken by Government by 2011/2012 in relation to the impact of the new proposed national income management categories could be used to inform broader social policy. In short we think that the answer has to be no. The evaluation of an income management program is a very different process to undertaking an evaluation to identify needs which would be required to inform the development of broader social policy across the country.

In relation to the implementation of an income management policy, we have consistently contended that there is no evidence base to support either the continuation of compulsory income management (using either the existing Northern Territory Income Management category) or the extension of compulsory income management with the proposed income management categories contained in the Bill. NWRN is sceptical that the proposed replacement of blanket compulsory income management in identified Indigenous Northern Territory communities with a scheme which targets particular cohorts will provide the requisite evidence base for an overhaul of the manner in which Social Security entitlements are provided across the country.

The NWRN is a network of services throughout Australia that provide free and independent information, advice and representation to individuals about Social Security law and its administration through Centrelink. For member details, services and information visit: [www.welfarerights.org.au](http://www.welfarerights.org.au)

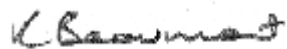
We would question the validity of any evaluation of the proposed new income management categories as the site of the first roll out of the new scheme will be in the Northern Territory to communities and to the 15,182 individuals (who as at 30 June 2009) are already being income managed and subject to the NTER. Nevertheless we would be receptive to any genuine attempts to improve the quality of available data to measure the effectiveness of income management

and the development of a framework which addresses the deficiencies identified by the Australian Institute of Health and Welfare in relation to the evaluation conducted by the Department of Family, Housing, Community Services and Indigenous Affairs (FaHCSIA) in 2008 regarding NTER income management measures. These namely being:

- the lack of any comparison group or baseline to measure what would have happened in the absence of income management;
- the limited amount of quantitative data on which to base the evaluation findings;
- the absence of empirical indicators that showed evidence of the changes reported by the various stakeholders;
- the relatively small number of clients who were not randomly selected for interview;
- the difficulty in measuring the overall effectiveness of income management in isolation from other measures; and
- the over reliance on anecdotal evidence, perceptions and opinions of a range of stakeholders.

Finally, we would welcome the opportunity to discuss with you our concerns regarding the proposed changes to the Social Security Appeals Tribunal (SSAT). We are extremely apprehensive that these changes if they proceed will undermine the quality of the review process and deter people from exercising their appeal rights, especially those most at risk.

Yours faithfully,



Kate Beaumont

President

National Welfare Rights Network