The Senate

Standing Committee on Employment, Workplace Relations and Education

Social Security Amendment (2007 Measures No. 2) Bill 2007 [Provisions]

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Chapter 1

Committee Majority Report

1.1 The Social Security Amendment (2007 Measures No. 2) Bill 2007 was introduced into the House of Representatives on 16 August 2007. The Senate referred the provisions of the bill to this committee on 12 September 2007 for report on 18 September 2007.

Conduct of the inquiry

1.2 Notice of the inquiry was posted only on the committee's website. The timeframe for the inquiry did not allow for public advertisements to be placed. However, the committee contacted a number of organisations taken to have an interest in the inquiry to seek submissions. The committee received 11 submissions, a list of which is at Appendix 1. The committee did not conduct a public hearing for this inquiry.

1.3 The committee is grateful to those organisations who responded to this inquiry at very short notice.

Provisions of the bill

1.4 This bill amends both the *Social Security Act 1991* (the act) and the *Social Security (Administration) Act 1999.* The amendments arise in part from policy announcements in the 2007-08 budget and from other measures intended to build on the Welfare to Work reforms which commenced on 1 July 2006.

1.5 The estimated cost of the implementation of the bill is approximately $6.2 million over four years.

Participation exemptions for principal carers

1.6 Item 1 of the bill inserts a new section 5E which defines ‘relative (other than a parent)’. The effect will be to extend participation exemptions to principal carers who are relatives but not parents of children. The definition in section 5E includes only principal carers who are related to the child by blood, adoption or marriage or through recognised traditional community kinship ties. Further to this, the bill makes clear that the child must be directed to live with the relative as a result of a family law order under either the *Family Law Act 1975*, a state child order, or an overseas child order registered under the *Family Law Act 1975*. As defined in Item 7 of the bill, a family law order does not include parenting plans.

Work capacity guidelines

1.7 Another significant amendment concerns work capacity assessment provisions. Items 2 to 4, 17, 18, 25 and 33 of the bill provide that the Minister, instead of the departmental secretary, is responsible for making guidelines under legislative instrument regarding the determination of a person's capacity to work. These guidelines can be made in respect of determining if:

- a person is incapacitated for work because of a sickness or an accident;
- the incapacity is caused wholly or virtually wholly by a medical condition arising from the sickness or accident; and
- the incapacity is or is likely to be of a temporary nature.[1]

1.8 The specific payment types for which these guidelines apply are the parenting payment, youth allowance, newstart allowance and special benefit. The amendments also require the secretary and review processes—including Centrelink Authorised Review Officers, the Social Security Appeals Tribunal and the Administrative Appeals Tribunal—to comply with the guidelines.

Disability Support Pension impairment tables

1.9 Items 36 to 46 of the bill make amendments to the terminology used in the impairment tables in Schedule 1B of the act which are used in the assessment of work-related impairment to determine a person's qualification for the disability support pension. The amendments will remove references to medical and clinical assessments or officers, for instance, replacing 'medical officer' with 'assessor' and 'medical assessment' with 'assessment'.

Section 12 of the Social Security (Administration) Act 1999

1.10 Item 47 of the bill repeals section 12 of this act and substitutes a new section that limits retrospective transfers between claims to 13 weeks. This item also clarifies that a claim is taken to be made without the need for a claim form. The bill further outlines, in Item 48, that a determination made on or after 1 January 2008 will be made under section 12 as proposed in this bill.

1.11 In addition, Items 29 and 34 of the bill omit references to section 12 in the sub-paragraphs relevant to the mature age allowance and partner allowance which were closed to new applicants in September 2003. This amendment is necessary as the new section 12 is no longer applicable to these closed payments.

Recovery of debt

1.12 Finally, Item 35 of the bill makes a technical amendment to clarify that the recovery of a debt is not able to be waived due to special circumstances if the debt has

1 Explanatory Memorandum, p. 7.

arisen due to a person knowingly failing to comply with the *Social Security (Administration) Act 1999*.

Key concerns

1.13 Many of the submissions raised concerns about the effects of the bill, with organisations representing the interests of people with a disability making up the majority of submitters. Support for the bill was limited to the proposed extension of participation exemptions for principal careers.

1.14 Government party senators also recognise that given the time constraints for this inquiry many of the submissions focussed only on one or two primary issues of concern and given more time would have commented on additional issues.

Principal carers

1.15 This aspect of the bill was broadly welcomed by those submitters who canvassed the issue.[2] The Department of Employment and Workplace Relations (DEWR) submitted that this amendment would recognise the contribution of relatives who take care of a child 'where parent(s) are unable or unwilling to do so'. The extension was also stated to be appropriate as this contribution from relatives, including grandparents, often reduces the need to place the child into formal foster care.[3]

1.16 The National Council of Single Mothers and their Children (NCSMC), in support of this amendment, stated that it would:

> reduce the incidence and level of harm being experienced by children whose primary carer is required to comply with the demands of the workforce participation system and care for dependent children.[4]

1.17 Where unfavourable comments were made on this issue, the general concern was that the amendments did not go far enough. Both the National Council on Intellectual Disability (NCID) and NCSMC recommended that the exemptions be broadened and both provided examples where this would be appropriate.

1.18 The National Welfare Rights Network (NWRN), however, took particular issue with the narrow definition of a family law order. It submitted that:

> Principal carers should be in a position to seek an exemption from participation requirements without the existence of a “family law order” as defined in item 7...[as this] undermines the utility and appeal of parenting

2 See the National Council on Intellectual Disability, *Submission* 1; National Welfare Rights Network, *Submission* 2; and the National Council of Single Mothers and their Children, *Submission* 8.

3 Department of Employment and Workplace Relations, *Submission* 11, p. 3.

4 *Submission* 8, p. 3.

> plans that include non-parents, and stands in direct contrast to the current policy and legislative drive towards parenting plans and family relationship centres as alternatives to the Family Courts.[5]

1.19 In response to this, Government party senators note DEWR's assertion that this limitation in definition does not in any way preclude a relative who does not have a family law order made under the *Family Law Act 1975* from obtaining benefits. Short-term periods of exemption can still be granted on a case by case basis under the current laws.[6]

Changes to impairment tables

1.20 The majority of submissions expressed disapproval of the proposed amendments to the impairment tables in Schedule 1B of the act. The Mental Health Council of Australia (MHCA) stated that it:

> appreciates that assessors may have knowledge and experience in occupations and the type tools that can be used to improve work capacity, however, [MHCA] does not agree with the assertions…that medical officers should not have a role in determining work functionality.[7]

1.21 Other submissions expressed similar concerns, for instance the NWRN argued that:

> points under the Impairment Tables are given according to the actual impairment caused by an identified medical condition. They are not given according to their likely impact in the workplace. It therefore makes more sense that a person's impairment rating be assessed by that person's treating doctor or by another medical professional.[8]

1.22 Australian Council of Social Service (ACOSS) also provided examples from the act of situations in which 'assessors', such as Job Capacity Assessors (JCAs), would be unlikely to reliably determine the availability and likely effects of medical treatment. ACOSS concludes that the act should therefore retain the references to 'medical officer'.[9]

1.23 The committee notes these concerns and strongly agrees that medical professionals are best placed to make such assessments. Government party senators however believe these concerns to be unwarranted in this instance. As DEWR stated in its submission, these amendments are neither intended to remove nor negate the

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5 *Submission* 2, p. 2.

6 Department of Employment and Workplace Relations, *Submission* 11, p. 4.

7 *Submission* 3, p. 2.

8 *Submission* 2, p. 4.

9 *Submission* 10, p. 3.

requirement to consider advice from medical practitioners. DEWR outlined the rationale for the amendments as follows:

> While the diagnosis and prognosis of a person's condition…is a function which is appropriately undertaken by doctors, the impact of such conditions on a person's work functionality is a role which Job Capacity Assessors are best placed to undertake.
>
> However, the Impairment Tables retain outdated references to medical officers and medical assessments. It is understood that these references were included in the Impairment Tables when all functional work assessments were undertaken by Government employed medical officers.[10]

1.24 Government party senators assert that these amendments have no ulterior purpose and rejects speculation that these amendments are intended to counter 'over generous' assessments in favour of applicants by medical officers.[11] Government party senators agree that these changes will ensure continued consistency for income support decisions and reviews.

Ministerial guidelines

1.25 Many of the submissions were concerned that neither the content nor the intent of the new ministerial guidelines had been made available. The NWRN stated that:

> [NWRN] has not been made aware of the proposed content of these legislative guidelines. The NWRN does not know if the legislative guidelines will mirror what is currently in the Department's oft-amended policy, 'The Guide to the Social Security Law'…It is therefore impossible for us to comment on the likely effect of this provision.[12]

1.26 The Australian Federation of Disability Organisations (AFDO) also echoed this concern, stating:

> If the Government wishes to provide more detail about the conduct and interpretation of work capacity assessments, this should be provided in the Social Security Act and not left to a disallowable instrument. In the absence of this scrutiny we cannot be assured that the measures contained in the Bill will not simply entrench the factors that are currently leading to many poor and inadequate work capacity assessments.[13]

1.27 In addition, ACOSS and the National Ethnic Disability Alliance (NEDA) were concerned that ministerial guidelines under legislative instrument would reduce

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10 *Submission* 11, pp 8-9.

11 Social Security Amendment (2007 Measures No. 2) Bill 2007, Bills Digest No. 41, Parliamentary Library, 11 September 2007, p. 14.

12 *Submission* 2, p. 3.

13 *Submission* 4, p. 3.

the necessary flexibility and discretion currently available for determining a person's capacity to work. NEDA argues that the current flexibility provides the greatest amount of certainty that the individual will be assessed appropriately.[14] ACOSS argues this point more extensively, stating that:

> It would be inappropriate for detailed guidelines in such a complex and sensitive area to be legislated which could lead to an excessively rigid and prescriptive approach to decision making.[15]

1.28 The committee notes that the guidelines under a legislative instrument will oblige all decision makers to adhere to the guidelines when determining a person's capacity to work. This process will undoubtedly assist, as DEWR states, to ensure appropriate and consistent reviews of income support decisions.[16] The committee also notes that this amendment would increase parliamentary scrutiny of the guidelines as they will be published on the Federal Register of Legislative Instruments and are disallowable.

1.29 The DEWR submission has also outlined the intent of the guidelines and provided an overview of the process.[17] This should be of value to those organisations concerned with the content of the guidelines.

Amendments to section 12

1.30 Three submission specifically raised concerns with the amendments to section 12 of the act.[18] AFDO stated that it could see no reason to place a time limit on the transfer between payments.[19] Further to this, the NWRN's submission provided a detailed explanation on the purpose and application of section 12. The submission also outlined case studies illustrating how this section, as currently applied, has benefited both the individual applicant and the department. The NWRN concludes that:

> relieving a person of a debt that they would not have incurred had they claimed an alternative payment earlier is merely a useful application of beneficial legislation. It puts the person in the position they would have been if not for their lack of knowledge or other circumstances…and the Commonwealth is thereby not out of pocket by applying the legislation in this way.[20]

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14 National Ethnic Disability Alliance, *Submission* 6, p. 2.

15 *Submission* 10, p. 2.

16 *Submission* 11, p. 7.

17 Ibid, p. 8.

18 See Mental Illness Fellowship of Australia, *Submission* 5; National Welfare Rights Network, *Submission* 2; and Australian Federation of Disability Organisations, *Submission* 4.

19 *Submission* 4, p. 3.

20 *Submission* 2, p. 6.

1.31 DEWR, however, outlined in its submission that section 12 operates in contrast to other similar provisions in social security law which already place restrictions on retrospective transfer payments. The committee considers it reasonable that a limit also be placed on section 12 transfers in line with other such limits contained in the act.

1.32 DEWR also identified that the lack of a retrospective transfer provision creates an undesirable administrative anomaly, potentially allowing a retrospective transfer to a closed or grandfathered payment. This is inconsistent with the Welfare to Work legislation, as DEWR stated in its submission:

> the potential transfer of a recipient from a payment which has participation requirements to a closed payment type which does not have participation requirements undermines the effect and intention of the Welfare to Work measures. [21]

Conclusion

1.33 Government party senators consider that the bill effectively builds on current legislation, with improved arrangements for principal carers as well as provisions for increased clarity in the application of social security law.

Recommendation
Government party senators recommend that the bill be passed.

Senator Gavin Marshall
Deputy Chair, on behalf of the chairman, Senator Troeth

21 *Submission* 11, p. 5.

Chapter 2

Labor Senators' Report

2.1 Labor members of the committee have considered the provisions of the Social Security Amendment (2007 Measures No.2) Bill 2007, and the issues raised by the organisations that made submissions to this inquiry.

2.2 At the outset, we wish to record our deep appreciation of the efforts made by those organisations who submitted to this enquiry at such short notice.

2.3 A number of concerns were raised in these submissions which lead Labor Senators to provide this report.

Disability Support Pension impairment tables

2.4 Labor members are aware of the many criticisms of the Government's job capacity assessment process, both raised in the context of this inquiry, and more generally. In particular, strong concerns were raised by the Australian Federation of Disability Organisations, the Physical Disability Council, the Mental Health Council and the Australian Council of Social Service in their submissions to this inquiry.

2.5 The concerns primarily relate to the appropriateness of utilising non-medical practitioners to provide impairment points ratings for the purpose of assessment of entitlement to the Disability Support Pension (DSP). Labor members of the committee are concerned with the consequences of removing medical practitioners from this assessment function. We note that these amendments would remove an important aspect of the assessment process in which medical opinion is currently required. In our view these provisions ought not proceed.

Recommendation

Labor Senators recommend that amendments relating to the Disability Support Pension impairment tables be opposed.

Legislative instrument

2.6 Labor members of the committee note the concerns raised in submissions regarding the content of the guidelines and consequent possible limitations on review proceedings.

2.7 Labor members believe the Government should commit to public consultation process prior to tabling and should ensure that DSP applicants have fair and reasonable opportunity to appeal decisions relating to job capacity assessments.

Scope of proposed participation exemptions

2.8 Labor members of the committee consider that these exemptions are overdue, and welcome the Government's belated response to community concerns on this issue.

2.9 Labor members of the committee have considered the concerns raised by the National Council on Intellectual Disability (NCID), and the National Council for Single Mothers and their Children (NCSMC) regarding the scope of the proposed exemptions. We do not consider the response in the Government Senators' report, focusing on the possibility of ad hoc exemptions, deals sufficiently with the issues raised. We consider the government should investigate more closely the issues raised by the NCID and NCSMC. In particular, we draw the Government's attention to the concerns raised by NCID as to the status of parents who are principal carers of children in receipt of carer allowance.

Recommendation
Labor Senators recommend that the bill be passed with amendments.

Senator Gavin Marshall
Deputy Chair

Chapter 3

Dissenting Report from the Australian Greens

3.1 The *Social Security Amendments (2007 Measures No 2) Bill 2007* attempts to fill a gap in relation to principal carers and has important implications for people in receipt or applying for the Disability Support Pension. While the Australian Greens welcome the recognition by the Government that there is a need to address problems with these existing provisions in relation to principal carers (which we raised at the time these measures were enacted) we are not convinced that these amendments properly address these outstanding issues.

3.2 The Australian Greens are also concerned that there has been insignificant time for the Committee to adequately consider the Bill. Submissions to the inquiry indicated a number of issues that would have benefited from a lengthier inquiry. The Australian Greens are very concerned about a number of unintended consequences from the amendments proposed by the Government.

3.3 For the purposes of our Dissenting Report, the Greens will focus primarily on issues relating to principal carers, changes to Disability Support Pension and the amendments to section 12 of the *Social Security Act*.

Principal Carers

3.4 The Bill provides for an extension of participation exemptions to principal carers who are relatives but not parents of children – where the principal carer is providing care for a child as a result of a family law order (as defined in the Act). These amendments also allow the person in this new category of a relative who is a principal carer but not a parent to access the higher PPS rate of Newstart or Youth Allowance.

3.5 The Australian Greens are pleased that the Government is finally recognising the role of kinship care through these amendments. However, while we welcome the intent of these amendments, we are concerned that they do not go far enough to effectively address the reality of kinship carer's circumstances.

3.6 The fact the Government belatedly recognised the need for this amendment is a demonstration of the flawed approach of the Government's Welfare to Work laws. These laws end up punishing the people who ought to be supported by our welfare system. Having implemented such a punitive regime, the Government then finds itself needing to make these sorts of amendments on a seemingly *ad hoc* basis to rectify the extreme harshness of its unintended impacts and knock-on effects on particular groups of people.

3.7 We note the comments of the National Council of Single Mothers and their Children (NCSMC) welcoming this amendment because it "will reduce the incidence and level of harm being experienced by children whose primary carer is required to comply with the demands of the workforce participation system and care for dependent children."[1] However,

[1] NCSMC, S*ubmission* 8, p.3.

while these changes will undo some of the damage done by Welfare to Work in this regard, there are many more gaps that need to be addressed.

3.8 For example, we note the submission of the National Welfare Rights Network that there is a need to recognise less formal arrangements than those that fall under the definition of a "family law order". They comment:

> There exist many circumstances where a relative of a child may become a principal carer without court orders being made. The narrow scope of the definition as detailed in this item undermines the utility and appeal of parenting plans that include non-parents, and stands in direct contrast to the current policy and legislative drive towards parenting plans and family relationship centres as alternatives to the Family Courts.

3.9 In many kinship care arrangements, family members who care for a child but do not have a family law order (or where protracted family law processes are still ongoing) still face the same demands as those with a formal order, and yet can still be subject to onerous activity requirements. There is no justification for the discrepancy, particularly when the Government is encouraging less formal arrangements through the establishment of Family Relationship Centres. These informal care arrangements are also particularly important in Aboriginal communities.

3.10 The Australian Greens agree with the recommendation from the National Welfare Rights Network that the definition of 'family law' should be extended to include parenting plans and other less formal care arrangements.

3.11 The Australian Greens also believe the Government should use this opportunity to fix broader principal carer inequities – particularly the contradiction between the presumption of equal shared care within the Family Law Act and the definition of a unitary principal carer within the Social Security Act. We have outlined this inequity in the past and will continue to draw it to the attention of the Senate until it is rectified. For the purposes of income support, the Government says that there is only one principal carer and that person is [treated as wholly or substantially] responsible for the care of the child. If you are the nominated principal carer you receive certain benefits under the Welfare to Work laws, whereas if you are the other parent in a shared parenting arrangement you receive exactly the same entitlements as someone with no parenting responsibilities.

3.12 The problem is that, at the same time as introducing Welfare to Work, the Government has made changes to family law which has moved to a model of equal shared care as the preferred social model. This is resulting in increasing numbers of parents with 50-50 shared caring arrangements within an income support system under which only one parent in a 50-50 shared care agreement can be determined to be the principal carer.

3.13 We are now seeing a significant number of people coming forward who nominally have 50-50 shared care, but are in reality shouldering an unequal part of the parental care burden because their shared care has not been recognised through the principal carer provisions of Welfare to Work. They are suffering and their children are suffering as a result of the Government not recognising that the move to a presumption of shared care within the family law system must be properly recognised within the income support system. The current situation is leading to disadvantage and inequality in the lives of many children.

3.14 The Australian Greens recommend that the income support definition of ‘principal carer’ be aligned with the intent of the family law changes to reflect the concept of shared parenting such that, where parents sharing the care of children each receive income support and the difference in percentage shared caring responsibility is 12 per cent or less, both are deemed to be principal carers.

Recommendation 1
That the definition of 'family law order' be extended to include parenting plans and other less formal care arrangements.

Recommendation 2
That the definition of 'principal carer' be amended to reflect the concept of shared parenting such that, where parents sharing the care of children each receive income support and the difference in percentage shared care responsibility is 12 per cent or less, both are deemed to be principal carers.

Changes to Disability Support Pension

3.15 There are two key issues with respect to the proposed changes to the Disability Support Pension: Firstly, the power given to the Minister to make guidelines by legislative instrument relating to the determination of a person's continuing inability to work, the application of impairment ratings, partial capacity to work and incapacity exemptions; and secondly, the changes to allow impairment ratings to be made by non-medically qualified assessors.

3.16 The Inquiry received a number of submissions from disability groups expressing concern over both of these changes.

Ministerial Guidelines

3.17 The main concern expressed by disability groups and the Australian Council of Social Services (ACOSS) on the issue of the Minister setting Guidelines by legislative instrument is the fear that such a change will restrict the discretion of the initial job capacity assessments and the Social Security Appeals Tribunal and Administrative Appeals Tribunal in reviewing the merits of assessments.

3.18 The Australian Greens share these concerns. Given that the proposed amendments provide that the Secretary must comply with the Guidelines determined by the Minister, the ability of the Secretary or a Job Capacity Assessor to take particular individual circumstances into account may be reduced. Discretion would necessarily be circumscribed by the fact of a legislative instruments setting out the Guidelines.

3.19 As ACOSS notes, the issues to be addressed in capacity assessments are highly complex, and accurate assessments require a high degree of discretion. The ACOSS submission makes a very important point on the complexity of assessments and the importance of this discretion:

> This is especially so under the present eligibility requirements for Disability Support Pension (DSP), which seek to make fine distinctions between those able to work for less than 8 hours per week, 15 hours per week, or 30 hours per week.

3.20 The Australian Greens are opposed to the idea of the Minister unilaterally creating guidelines for work capacity assessments. We believe that the creation of guidelines of this nature needs to involve a public consultation process to ensure that any such Guidelines are both credible and transparent. Given the great variation in individual circumstances and the corresponding complexities of the impacts and interactions of various disabilities on an individual's capacity to work, it is important that capacity assessment guidelines recognise that the experience and expertise of the assessor is a crucial factor – that they do not seek to be too prescriptive, and that they recognise the importance of expert discretion in capacity assessment.

Recommendation 3
That the changes relating to the Minister making guidelines by legislative instrument and those requiring the Secretary to then comply with those Guidelines be removed from the Bill.

Changes to impairment ratings

3.21 The second main issue with respect to changes to the DSP relates to the replacement of 'medical officers' with 'assessors' in the context of the impairment tables.

3.22 The key concern with this amendment is that it will make it even less likely that the job capacity assessment process will result in accurate assessments. This is likely to have significant consequence for persons in respect of accessing DSP.

3.23 As ACOSS points out, there are essentially two steps in assessing a person's work capacity: determining the person's impairment rating; and then assessing the effect of the impairment on the capacity of the person to work a certain number of hours each week. ACOSS suggests that the effects of the amendments are:

> …to remove any presumption in the Social Security Act that a qualified medical practitioner should conduct certain assessments, particularly the assessment of impairment rating using the Impairment Tables in Schedule 1B of the Act.

3.24 The ACOSS submission goes on to provide examples of where there should still be a presumption of a medical officer undertaking the assessments, because non-medically qualified professionals would be unlikely to make the expert assessments required. These examples include assessing the likely effects of medical treatment and pain or fatigue being assessed in terms of the underlying medical conditions which causes it.

3.25 The Inquiry also received submissions from organisations dealing with mental illness concerned that medical officers were best placed to make a decision about the impact of mental illness on a person's capacity to work, particularly when many such people may have a fluctuating capacity to work.[2]

3.26 The Mental Health Council of Australia comments that:

> Determining the ability of a person with mental illness to work can be a very complex process, and is not as simple as referring to a table and

[2] Mental Health Council of Australia p.2

applying points. A person may present well on the day of the assessment but then experience a relapse of their condition. This will not be picked up in the assessment if the assessor does not have the necessary medical information or an understanding of the mental illness.

3.27 The Australian Greens are not suggesting that there is no role for non-medical Job Capacity Assessors, and we recognise that JCAs come from a wide range of allied health professionals. However, we believe that there is no good reason for these amendments and we are concerned about their consequences on the quality and consistency impairment assessments.

Recommendation 4
That the changes which would allow impairment ratings to be made by non-medically qualified professionals be removed from the bill.

Amendments to Section 12

3.28 The Australian Greens take note of the submission by the National Welfare Rights Network in relation to section 12 and agree with their recommendation that the 13 week restriction be removed from the Bill.

3.29 The Greens can see no good reason why the 13 week restriction is necessary. We also agree with the National Welfare Rights Network that the application of Section 12 as a means of relieving debt is reasonable, given the unfairness of many debts and the limitations on waiver.

Recommendation 5
That the 13 week restriction on the application of section 12 of the Social Security Administration Act be removed from the bill.

Senator Rachel Siewert
Australian Greens

Appendix 1

List of submissions

Sub No.	Submitter
1	National Council on Intellectual Disability, ACT
2	National Welfare Rights Network, NSW
3	Mental Health Council of Australia, ACT
4	Australian Federation of Disability Organisations, VIC
5	Mental Illness Fellowship of Australia, SA
6	National Ethnic Disability Alliance, NSW
7	Physical Disability Council of Australia, NSW
8	National Council of Single Mothers and their Children, SA
9	Brain Injury Australia, VIC
10	Australian Council of Social Service, NSW
11	Department of Employment and Workplace Relations, ACT