

**Social Security
for Women Outside
our Cities**

Issues of eligibility

August 2025

Economic Justice Australia would like to thank the many people and organisations who supported and collaborated on this research report.

The research for this report took place right across Australia, on unceded Aboriginal and Torres Strait Islander lands. Economic Justice Australia acknowledges and pays respects to Elders throughout Australia, past and present. We recognise First Nations peoples have always had a voice and solutions to ensure self-determination, and we affirm First Nations peoples' continuing leadership in creating just and sustainable solutions for their communities.

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About Economic Justice Australia

Economic Justice Australia (EJA) is the peak organisation for community legal centres providing specialist advice to people on their social security issues and rights. Our members across Australia have provided people with free and independent information, advice, education and representation in the area of social security for more than 40 years.

EJA Member Centres provide expert social security legal advice to thousands of people all over Australia each year. Through their daily casework, our Member Centres see how social security is delivered to people in diverse situations and settings. This evidence-based practice is a foundation of EJA's policy and advocacy work, facilitating the identification of new and/or systemic issues that create barriers to people's access to their social security entitlements.

EJA's advocacy aims to make the social security system more effective and accessible. This work:

- Strengthens the effectiveness and integrity of our social security system
- Educates the community
- Improves people's lives by reducing poverty and inequality.

This report would not have been possible without the contribution of EJA Members Centres' expertise and vast casework experience.

EJA Member Centres

Basic Rights Queensland	Mid North Coast Legal Centre
Barwon Community Legal Centre	Monash Law Clinics Victoria
Canberra Community Law	Northern Australian Aboriginal Justice Agency
Central Australian Women's Legal Service	North Australian Aboriginal Family Legal Service
Darwin Community Legal Centre	Social Security Rights Victoria
Fremantle Community Legal Centre	Sussex Street Community Law Service
Hobart Community Legal Service	Top End Women's Legal Service
Illawarra Legal Centre	Townsville Community Law
Katherine Women's Information & Legal Service	Uniting Communities Law Centre
Kimberley Community Legal Services	Welfare Rights Centre (NSW)
Launceston Community Legal Centre	Welfare Rights & Advocacy Service (WA)

Executive Summary

This report is the second in the three-part series, *Social Security for Women Outside Our Cities*. The first report focused on access to services and service delivery. This report addresses some of the key limitations of current legislation and policy undermining the effective targeting of social security support to women in regional, rural, remote and very remote (4R) Australia. The experiences of women, and the community workers who support them, are framed using concepts integral to the social security system: women as parents and/or guardians, women with disability or chronic illness, women who are carers, women who are underemployed or unemployed, and young women.

The findings contained in this report reflect issues commonly seen by EJA Member Centres, as well as the more than 100 additional community service workers interviewed for this project. Barriers associated with geographic isolation and/or distance from large population centres, and ways in which these stymie access to social security entitlements, are clearly evident. Also evident is the highly gendered nature of caring responsibilities, both for children and for people who have a disability or are frail or unwell; the prevalence and consequences of family and domestic violence against women; and the significant weight of responsibility many women carry for their household administration and family's financial security.

Two major issues underpin many of the issues identified in this report. Firstly, there is an urgent need to raise the rate of working age payments – JobSeeker Payment, Austudy and Youth Allowance – which have failed to keep up with the cost of living, particularly the soaring cost of housing. Youth Allowance, in particular, is woefully inadequate. An increase to Rent Assistance and Remote Area Allowance is also urgently needed, noting Remote Area Allowance has not increased at all in 20 years.

Secondly, the social security system is too complicated for both those needing to access it and, we suggest, those responsible for its administration. For example, Disability Support Pension is known for its complex eligibility criteria and claim process, and issues of access are further exacerbated by limited access to medical treatment and associated evidence required to establish DSP eligibility, particularly in 4R areas. It's a puzzle many cannot solve.

Another example is the multiple payments that target parents and guardians. These are drawn from two distinct systems, comprising 'social security' payments (most commonly, income support payments) and family assistance payments (including Family Tax Benefit), with myriad eligibility requirements, reporting obligations, modes of assessment and rates of payment. These two systems are underpinned by different Acts, different policy tools, and administration by different branches of Services Australia, with limited data sharing undermining efficiencies.

Simplification of the social security system has the potential to increase access for those who are already eligible, and decrease the frequency of social security debts. Some of the many areas that would benefit from simplification are noted throughout this report.

Other specific findings include that:

- ‘Care of children’ rules are a poor fit for many parents, including women losing financial security when children ‘age out’ of payments, care arrangements being weaponised by disgruntled and/or abusive ex-partners, First Nations people missing out on payments as a result of kinship care arrangements, and the loss of payments following child removal undermining reunification goals.
- Administration of child support undermines social security, including lacklustre collection of child support arrears, uneven application of Maintenance Action Test exemptions, and a lack of proactivity applying the disbursement method of child support assessment under the Maintenance Income Test.
- Access to Disability Support Pension is undermined by the Program of Support requirement, which disproportionately affects women who cannot work and are unable to secure timely medical treatment and evidence.
- Rigid carer payment criteria, including those relating to care location and the need for ‘constant care’, prevent some women accessing carer payments despite their caring responsibilities limiting or preventing paid employment. Some carers remain on payments with mutual obligations, which are a poor fit with significant caring responsibilities, particularly for First Nations women balancing traditional caring responsibilities and community obligations.
- Current assessment tools undervalue supervisory care – including care for a person with a psychiatric condition, cognitive impairment and/or behavioural disorder – and exclude some carers who provide 24-hour supervisory care from receiving social security support.
- Many women in 4R areas want assistance to find employment but are unable to obtain it through employment service providers, which administer job plans that are not fit-for-purpose and prioritise job plan compliance over genuine assistance.
- The siloing of departmental and program responsibilities between the Department of Employment and Workforce Relations, Department of Social Services and Services Australia, and poor attention to the principles of administrative review, leave many women unable to establish who to contact to resolve problems or appeal.
- The mutual obligations system is not yet adequately responsive to natural disasters, extreme weather and other emergencies, which are occurring with increasing frequency in many 4R areas.
- The age of ‘independence’ for income support, currently set at 22, is too high and does not reflect the reality for many young women. This locks them out of payments or leaves them on lower ‘dependent’ payment rates, despite living independently, including when they have had to move from a 4R area to study or look for work.
- Alternative pathways to ‘Independence’, such as the ‘Unreasonable to Live at Home’ assessment, are vital – but rigid and complex policy guidelines and assessment processes create barriers, including for young women experiencing family or domestic violence.

- Parental means test thresholds have been outpaced by living costs, creating genuine financial hardship for middle-income families, and at times resulting in young women giving up on study, living in unsafe situations or experiencing homelessness.
- The binary nature of Youth Allowance (student) and Youth Allowance (other) creates a disincentive to tertiary study for young women who cannot earn enough to meet expenses while maintaining a full-time study load.
- Young women leaving out-of-home care can fall through jurisdictional gaps between Commonwealth and state systems, resulting in delays, confusion, and inappropriate debt recovery during critical periods of transition.

No one should be excluded from social security because of where they live, yet many women outside Australia's major cities struggle to access social security payments appropriate to their situation. The issues outlined in this report demand urgent attention to increase accessibility.

EJA recognises that systemic change will not be achieved through publication of our *Social Security for Women Outside Our Cities* reports alone. We will continue to put the evidence outlined in these reports in front of relevant Ministers and agencies, including the Department of Social Services and Services Australia. That process has already begun, including advocacy which has resulted in positive change.

Recommendations

A note on Rent Assistance

Recommendation 1: That the Federal Government review and increase Rent Assistance to adequately support low-income households, including benchmarking Rent Assistance against actual rents and indexing to reflect rental price movements.

Chapter 1: Women who are parents or guardians

Simplified system

Recommendation 2: That the Department of Social Services review the structure of payments targeting parents, particularly Parenting Payment and Family Tax Benefit, with a goal of developing policy reforms to simplify the system and reduce the system's absolute reliance on annual income-based assessment for payments relating to children.

Recommendation 3: That Services Australia ensure frontline staff are equipped to explain the different structure of payments targeting parents, and assist people to manage their reporting obligations.

Recommendation 4: That the Department of Social Services and Services Australia identify obstacles to communication between family payment and income support IT systems, and develop strategies to address these issues as a matter of urgency.

Smooth points of transition

Recommendation 5: That the Federal Government amend section 500D(2) to increase the qualifying age limit for Parenting Payment Single, from the youngest child of a principal carer being age 14 to age 16.

Recommendation 6: That the Department of Social Services and Services Australia review policy and procedural guidelines to identify and address issues that can disrupt income support continuity where a person loses eligibility for parenting-relating payments and needs to transition to another payment.

Stronger support for care of children

Recommendation 7: That the Federal Government undertake legislative and policy reform to remove compulsory mutual obligations requirements from primary carers, replacing them with supportive measures to help find employment, modelled on the rationale underpinning the new voluntary Parents Pathways program.

Recommendation 8: That Services Australia review the Operational Blueprint to preclude decisions being made about change of care arrangements without confirmation from both parents/guardians, including where decisions are made by Centrelink or Child Support.

Recommendation 9: That the Department of Social Services consider avenues to provide a form of transitional parenting-related income for a period following child removal by a government authority to assist parents to maintain housing and undertake other efforts towards reunification.

Recommendation 10: That the Department of Social Services and Services Australia identify means for a person to be paid Parenting Payment or Family Tax Benefit on the day they reunify with/regain care of a child.

Recommendation 11: That Services Australia work with state government agencies to develop mechanisms to provide timely alerts prior to a person leaving an institutional setting with the expectation that they will regain care of their child, so the person may be paid Parenting Payment or Family Tax Benefit on the day they reunify with/regain care of a child.

Recommendation 12: That the Department of Social Services and Services Australia review provisions relating to kinship care, with the aim of ensuring the social security system is responsive to kinship care practices in First Nations communities.

Effective social security/child support interface

Recommendation 13: That Services Australia make available findings from their research into Maintenance Action Test 'failure' data, and undertake evidence-based reform to reduce the number of women stuck on base rate Family Tax Benefit A.

Recommendation 14: That Services Australia undertake a review of all cases of people currently receiving only base rate of Family Tax Benefit A as a result of the Maintenance Action Test, and provide assistance to those wanting to take action to receive their maximum social security entitlement, whether by pursuing maintenance or seeking an exemption.

Recommendation 15: That the Department of Social Services amend the Family Assistance Guide, particularly sections 1.1.D.100 and 3.1.5.70, to provide clarity around Maintenance Income Test exemptions and the disbursement method of child support assessment.

Recommendation 16: That Services Australia review processes for delivering information to customers about the Maintenance Action Test to ensure the test, exemptions, and the consequences of not pursuing child maintenance are fully understood.

Recommendation 17: That Services Australia review processes for informing customers about the disbursement method of child support assessment (and associated provisions for people subject to Private Collect arrangements) to increase understanding among customers and community service providers, with a goal of increasing uptake where full child support is not being received.

Recommendation 18: That the Federal Government expedite reforms based on the findings of the weaponisation of government systems audit.

Chapter 2: Women with disability and chronic illness

Accessible DSP eligibility criteria and claim process

Recommendation 19: That the Federal Government undertake legislative reform to simplify Disability Support Pension eligibility criteria.

Recommendation 20: That Services Australia undertake a user-focused review of the complexity of Disability Support Pension claim forms with the aim of making them as simple and intuitive as possible, while prompting people to supply all relevant evidence.

Recommendation 21: That Services Australia staff promote an assisted claims process to assist people requiring support to complete the Disability Support Pension claim form and associated forms, and to provide proactive assistance by suggesting and seeking evidence.

Recommendation 22: That Services Australia identify people with chronic illness or disability receiving other payments, and engage in discussion with them to gauge whether they are likely to be successful if they claim Disability Support Pension before a claim is lodged.

Recommendation 23: That Services Australia ensure administrative processes and forms are available for people who are unable to effectively make use of digital technologies to claim Disability Support Pension.

Accessible medical evidence

Recommendation 24: That Services Australia routinely make requests to medical services on behalf of vulnerable Disability Support Pension claimants where the claimant is unable to secure evidence unassisted.

Recommendation 25: That the Department of Social Services and Services Australia review and amend the *Social Security Guide* to increase consideration of alternative medical evidence processes for people in regional, rural, remote and very remote areas.

Recommendation 26: That Centrelink reintroduce a Treating Doctor Report as part of the Disability Support Pension claim package, with introduction of a new Medicare item number to ensure it is billable under Medicare.

Recommendation 27: That Services Australia introduce a phone line for medical professionals to call if they have questions about the Disability Support Pension claim form or associated evidentiary requirements.

Recommendation 28: That Services Australia increase the frequency of Job Capacity Assessors travelling with Remote Servicing Teams to undertake assessments of people in regional, rural, remote and very remote areas, whose access to Job Capacity Assessment is limited by their geographic location.

Abolition of Program of Support

Recommendation 29: That the Federal Government introduce legislation to amend Disability Support Pension qualification criteria outlined in section 94 of the *Social Security Act*, removing the Program of Support requirement; and in the interim, that they include clear criteria for exempting a person from the Program of Support requirement.

Chapter 3: Women who are carers

Clear understanding of carer entitlements and accessible claim process

Recommendation 30: That Services Australia improve partnerships with local healthcare providers, community organisations, and local government to disseminate information about payments for carers through trusted local networks in regional, rural, remote and very remote areas.

Recommendation 31: That Services Australia make Carer Payment forms available on their website.

Effective pathways for treating healthcare professionals

Recommendation 32: That Services Australia modify the Adult Disability Assessment Tool and Disability Care Load Assessment forms to clearly explain the role and responsibility of treating health professionals when providing evidence of care needs.

Recommendation 33: That the Department of Social Services and Services Australia develop clearer guidance and training for treating health professionals about their role and responsibilities completing assessment forms.

Recommendation 34: That Services Australia establish a dedicated hotline for treating health professionals who require assistance to complete Adult Disability Assessment Tool or Disability Care Load Assessment forms or additional information regarding their role in the claim process.

Assessment tools that recognise supervisory and other care

Recommendation 35: That the Department of Social Services make available the evaluation and findings of the 2015–2017 Adult Disability Assessment Tool review and pilot.

Recommendation 36: That the Department of Social Services and Services Australia jointly instigate a review of carer assessment tools, including the Adult Disability Assessment Tool and Disability Care Load Assessment questionnaires, and legislative instrument, with the review process aligning with the recent review of the Disability Support Pension Impairment Tables.

Recommendation 37: That Services Australia and the Department of Social Services develop culturally appropriate assessment processes, in consultation with First Nations communities, that recognise the breadth of First Nations care work, including kinship care arrangements and cultural obligations.

Recognition of psychologists' evidence

Recommendation 38: That the Federal Government amend the *Adult Disability Assessment Determination 2018* to include psychologists as approved treating health professionals for Adult Disability Assessment Tool assessments, consistent with current child assessment criteria and evidence-based best practice.

Improved definition of 'constant care' and location of care

Recommendation 39: That the Department of Social Services amend the *Social Security Guide* to include a definition of 'constant care' that reflects full-time employment equivalence.

Recommendation 40: That the Federal Government amend section 197E of the *Social Security Act 1991*(Cth), replacing the 'constant care in home' criteria with criteria that provide a more realistic definition of care requirements as defined by key stakeholders.

Recommendation 41: That the Department of Social Services amend the *Social Security Guide* at 3.6.4.10 to allow carers with school-aged children to work up to 30 hours per week or, alternatively, during school hours.

Chapter 4: Women who are underemployed or unemployed

Working age payments above the poverty line

Recommendation 42: That the Federal Government increase working age payment rates to provide parity with pensions, with indexation linked to both inflation and wages.

Supportive system into employment

Recommendation 43: That the Department of Employment and Workplace Relations abolish the Targeted Compliance Framework, including payment suspensions.

Recommendation 44: That the Department of Employment and Workforce Relations build on recent reforms to embed an adequate administrative review system and ensure employment services participants receive protections under social security law.

Recommendation 45: That the Department of Employment and Workplace Relations amend the *Social Security (Administration) (Reasonable Excuse Participation Payments) Determination 2018* to specify that extreme weather events or the lasting effects of natural disasters can be a 'reasonable excuse' for failing mutual obligations requirements.

Recommendation 46: That the Department of Employment and Workplace Relations apply mutual obligation pauses during heatwaves and other extreme weather events.

Recommendation 47: That the Federal Government increase efforts to guarantee:

- A rights-based approach to social security
- Evidence-based interventions that provide real pathways to employment
- Genuine, supportive employment services that are sufficiently resourced to help people find work
- Policies that respect people's dignity.

Recommendation 48: That the Federal Government prioritise development of a non-punitive approach to employment services participation in consultation with people directly affected by the system, peak bodies and experts, allowing decision-makers to consider the full set of circumstances informing a person's capacity to comply.

Chapter 5: Young women

Youth Allowance recognises independence of young people

Recommendation 49: That the Federal Government amend section 1067A(4) of the *Social Security Act* to lower the permanent independence age from 22 to 18 years for all Youth Allowance recipients.

Recommendation 50: That until the age of permanent independence is lowered to 18 years, the Federal Government amend section 1067A(4) of the *Social Security Act* to establish independence for young people who have been self-supporting for 12 months or more, regardless of parental income.

Recommendation 51: That until the age of permanent independence is lowered to 18 years, the Federal Government remove section 1067A (10E)(d) and (e), thereby removing the parental income threshold from concessional workforce independence criteria for young people from regional, rural, remote and very remote Australia.

Recommendation 52: That until the age of permanent independence is lowered to 18 years, the Federal Government amend section 1067A (10E)(d) of the *Social Security Act*, reducing the required period of employment since a person left secondary school from 14 months to 12 months for concessional workforce independence criteria for young people from regional, rural, remote and very remote Australia.

Recommendation 53: That the Federal Government amend section 1067G of the *Social Security Act* to immediately review and increase parental income thresholds for young people from regional, rural, remote and very remote areas who are seeking to access Youth Allowance.

'Unreasonable to live at home provisions' fit for purpose

Recommendation 54: That the Federal Government amend section 1067(9) of the *Social Security Act* to expand the Unreasonable to Live at Home criteria to include young people with documented history of family violence (including those who have applied for violence prevention orders), without requiring additional evidence of serious risk' to physical or mental wellbeing.

Recommendation 55: That the Federal Government amend section 1067A of the *Social Security Act* to establish specific independence provisions for LGBTIQ+ young people where family relationships have broken down due to rejection or non-acceptance of their gender identity or sexual orientation.

Recommendation 56: That Services Australia develop specialised assessment protocols for LGBTIQ+ young people who are unable to live at home for reasons including issues of gender identity or sexual orientation.

Recommendation 57: That Services Australia improve Unreasonable to Live at Home assessment procedures to better recognise coercive control, psychological abuse, and family rejection as valid reasons to avoid parental contact.

Recommendation 58: That the Department of Social Services review and expand the definition of 'continuous support' to include situations where parents refuse to provide financial support regardless of their income level.

Recommendation 59: That Services Australia develop specialised training for staff assessing independence applications from young people in regional, rural, remote and very remote areas, with a particular focus on the unique challenges, safety risks, and economic realities faced by this cohort.

Gap between Youth Allowance (student) and Youth Allowance (other) addressed

Recommendation 60: That the Department of Social Services review youth payment study requirements with a view to creating flexible study load options that allow a recipient to undertake part-time study without losing payment eligibility, particularly for young women experiencing health challenges or caring responsibilities.

Young people who've experienced out-of-home care supported

Recommendation 61: That the Department of Social Services and Services Australia consider informal and voluntary out-of-home arrangements (supported by local child protection agencies) for the purpose of assessing independence.

Recommendation 62: The Federal Government increase the rate of, and index, Transition to Independent Living Allowance.

Recommendation 63: That the Federal Government amend section 1067G of the *Social Security Act* regarding classification of state and territory support payments to allow all young people leaving care to receive the higher 'away from home' rate of Youth Allowance, regardless of the type of state support they receive; or establish a guaranteed independent living allowance or comparable measure.

Introduction

Many of the mothers are really juggling their money to try and make sure the kids don't miss out on anything. Some are living in motel rooms and worrying about, "How am I going to keep all the kids entertained in one room?" Imagine not having a washing machine with five kids in one room ... for months and months and months. [They're] juggling a lot with their children to try and protect them.

— Australian Capital Territory

Social Security for Women Outside Our Cities Part 2: Issues of Eligibility is the second in Economic Justice Australia's series of three reports identifying barriers to social security for women living in regional, rural, remote and very remote (4R) Australia. While report one was focused on access to services and service delivery, report two addresses some of the key limitations of current legislation and policy undermining the effective targeting of social security support to women. That includes women as parents or guardians, women with disability or chronic illness, women who are carers, women who are underemployed or unemployed, and young women.

EJA Member Centres regularly advise and assist women from 4R areas to access their social security entitlements. This report digs into common issues, drawing on the evidence of EJA Member Centres and the many additional community service workers interviewed for the project. Given the diversity of women living in 4R areas, it takes a broad approach to issues of social security access – considering barriers experienced by women in 4R areas, rather than barriers particular to 4R areas, although barriers associated with geographic isolation and/or distance from large population centres (with associated infrastructure and services) are clearly evident.

Many of the findings from this report are applicable across genders, however, a number of consistent themes recur. These include the ongoing, highly gendered nature of caring responsibilities, both caring for children and for people who have a disability or are frail or unwell; the prevalence and consequences of family and domestic violence against women; and the significant weight of responsibility women often carry for their household administration and financial security. Also apparent is the ongoing disadvantage experienced by First Nations women in 4R Australia.

The social security system aims to provide a safety net – alleviating poverty for those who are unable to support themselves financially due to age, disability, illness, caring responsibilities or under/unemployment. It is underperforming in two key ways.

Firstly, working age payments are generally inadequate, having failed to keep up with the cost of living over the last two decades. The rising cost of housing, in particular, has destabilised security for many who are unable to afford the basics – food, utilities, medical care, etc. There is an urgent need to raise the rate of working age payments, as well as Rent Assistance and Remote Area Allowance.

Secondly, the social security system is too complicated, for both those needing to access it and, we suggest, for those responsible for its administration.

The social security system is highly targeted – arguably overly targeted – which is why each social security payment type is defined by myriad stringent rules and requirements determining an individual person’s eligibility. The primary consequence of that approach is that eligibility for social security support doesn’t start with whether a person needs support, but with if and how a person fits within the strict criteria of a particular payment type.

Targeting extends to the structuring of payments, including what a person must and must not do to retain eligibility. This results in frequent issues where a person ends up with a social security debt because they have not fully understood all the conditions associated with their payment, so have not told Services Australia when their circumstances changed.

Targeting has a major impact on a person’s financial security given each payment type has a set of specific rates and means testing, resulting in payment rates being completely inequitable. For example, a single person with no dependent children on a full-rate payment will receive around \$82/day on a pension but \$56/day on JobSeeker Payment. A person in similar circumstances, aged 21 and considered ‘independent’ from their parents, will receive only \$47/day on Youth Allowance.

The other consequence of the highly targeted nature of the social security system is the enormous complexity of the legislation and associated policy that governs it. Renowned amongst lawyers for its scale and intricacy – comprising numerous Acts, legislative instruments and policy rules spanning social security and family assistance systems – administration is complex and costly. It is also too complicated for most people to understand. To quote Weinberg J, from the Full Court of the Federal Court decision in *Secretary, Department of Family and Community Services v Geeves*:¹

It is almost farcical that it should take eminent senior counsel the best part of a morning simply to take the Court through the various provisions of the Social Security Act that are relevant in order to determine whether a particular individual is entitled to a benefit under that Act. The question whether Ms G[] should receive a carer’s benefit for looking after Mr E[] ought to be able to be answered relatively easily. There is nothing extraordinary about his situation, and it can hardly be said that the legislature did not anticipate cases such as his ... Regrettably, as each year goes by, the Social Security Act becomes still more complex, and less accessible to those who most need to understand it.

While this report describes specific issues associated with specific payments, the central point remains that there are enormous gains to be made from simplification of the system. Ironically, perhaps, simplification involves a highly technical process but has the potential to open up the system by removing unintended barriers to those who are, or should be, eligible for social security support, and to deliver tangible benefits to women in 4R Australia.

¹ *Secretary, Department of Family and Community Services v Geeves* [2004] FCAFC 166 at [36]-[37].

Project methodology

EJA is deeply appreciative of the dedication of the many contributors to both this report and the research underpinning it. That includes interviewers, authors, reviewers and members of the project Advisory Group. Contributors are listed at Appendix 1.

Research relied on a mixed methodology approach including:

- qualitative research with more than 160 community service workers working in diverse 4R areas
- analysis of Services Australia, Department of Social Services and Administrative Appeals Tribunal data
- desk review of current Australian research on the experiences of women in 4R Australia and social security
- legal analysis of social security policy, legislation and case law.

For more on project methodology see [Social Security for Women Outside Our Cities Part 1: Service Delivery Barriers](#), noting this report draws on input from a number of additional contributors since publication of Report 1 (April 2025).

Terminology

Key terms include:

- **Women** - referring to all people who identify as women regardless of their sex assigned at birth. This follows the Federal Government Guidelines on the Recognition of Sex and Gender; guidelines relied upon by both Services Australia and the Department of Social Services.
- **4R** - an abbreviation of 'rural, regional, remote and very remote', with classification of location per the Modified Monash Model, based on the Australian Statistical Geography Standard – Remoteness Areas framework.
- **First Nations** - recognising that Aboriginal and Torres Strait Islander peoples are the first sovereign peoples of Australia, with their own diverse languages, cultures, and connections to Country.

Use of data

Data is drawn from a number of sources, including data provided to EJA for the specific purpose of use in this report.

- Gender disaggregation of data

Much of the quantitative data referenced is drawn from the Department of Social Services' quarterly [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#). Reporting of 'women' reflects that in December 2022, Services Australia implemented a change in the Centrelink payment system to recognise gender other than the sex assigned at birth or during infancy, or as a gender which is not exclusively male or female. To protect the privacy of individuals and comply with confidential policy, persons identifying as non-binary have initially been grouped with females in the period following implementation of this change. The Department of Social Services is monitoring the implications of this change and will publish the non-binary gender category as soon as privacy and confidential considerations allow.

- Geographic disaggregation of data

Each chapter includes data on payments made to people in metropolitan, regional/rural, and remote/very remote areas. Those data sets were derived by applying Modified Monash Model classifications to local government area disaggregated data from the Department of Social Services' quarterly [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

This report

This report has been authored by EJA staff with additional research assistance from Wotton Kearney's Pro Bono program. Draft chapters were checked for accuracy by practicing solicitors from EJA Member Centres. Services Australia undertook factchecking of references to Services Australia's structure and operations, noting this did not include factchecking of general statements or matters of opinion which were not supported by a source document. Case studies are real, provided by EJA Member Centres, with minor changes to specific dates and locations to protect individual clients' privacy. Initial layout and concept were generously provided pro bono from Hall and Wilcox, with design and layout of this report by Dave Wells from Ramen Studios.

The third report in the *Social Security for Women Outside Our Cities* series is due for publication in early 2026.

Advocacy

This project was always intended as a means to ensure evidence-based advocacy. EJA recognises that systemic change will not be achieved through publication of this report series alone.

The next stage of this project involves working with communities, the Federal Government and key stakeholders as EJA undertakes targeted advocacy activities and capacity-building workshops to progress recommendations resulting from this research project. Reforming the social security system will require concerted and coordinated efforts from many different sectors and institutional bodies working together to achieve meaningful change.

Evidence from this project has already proven valuable to EJA's advocacy, informing priorities since research began in early 2023. That includes information exchange and advocacy to relevant Ministers, the Department of Social Services and Services Australia, which has resulted in improvements to the social security system.

A note on Rent Assistance

Australia is in the midst of a housing crisis characterised by a rapid rise in rental costs and a severe shortage of affordable and accessible housing. Over the 10 years to March 2025, median advertised rents in Australia rose by approximately 48 per cent for both houses and units, with rents rising to a record high in the first quarter of 2025.²

Low-income households are facing enormous financial strain, forced to spend a significant portion of their income on housing. In 2024–25, an estimated 1.26 million low-income households were in financial housing stress, spending more than 30 per cent of their disposable income on housing.³ The lack of rental affordability is exacerbated by the rising cost of living, including the costs of food and energy.

Anglicare’s 2025 Rental Affordability Snapshot survey of more than 50,000 rental listings across Australia found that rental affordability has crashed to record lows. That report includes findings relating to affordability for income support recipients, including the fact that less than one per cent of rentals were affordable to a person on Age Pension or Disability Support Pension; and that no rentals, including those in share houses, were affordable to a person on JobSeeker Payment or Youth Allowance.⁴

Lack of housing affordability is the most rapidly growing cause of homelessness in Australia,⁵ with homelessness among women increasing by an estimated 10 per cent between 2016 and 2021, compared to a two per cent increase in the number of homeless men.⁶

The social security system includes Rent Assistance, a ‘supplementary payment’ intended to ease the financial burden of rent on low-income households. Rent Assistance can be paid to an eligible person receiving an income support payment, ABSTUDY or Family Tax Benefit, who rents in the private rental market or community housing. Rent Assistance does not require a separate claim, and is paid fortnightly with the recipient’s main payment. Approximately 1.4 million people or groups of related people currently receive Rent Assistance,⁷ although not all receive the full rate as Rent Assistance may be reduced as a result of income and asset testing rules.

2 CoreLogic (2025). [Quarterly Rental Review – Australia – released April 2025](#).

3 Australian National University Centre for Social Policy Research data cited in Australian Institute of Health and Welfare (2025). [Housing affordability](#).

4 Anglicare (2025). [2025 Rental Affordability Snapshot](#).

5 Salvation Army (2025). [Australia’s housing crisis](#).

6 The Australian Housing and Urban Research Institute (2024). [What are the real costs of Australia’s housing crisis for women?](#)

7 Australian Institute of Health and Welfare (June 2025). [Commonwealth Rent Assistance in Australia: quarterly data](#).

Rent Allowance is paid at the rate of 75 cents for each dollar of rent paid above a set threshold, up to a maximum rate, with both rent thresholds and maximum rates varying depending on the recipient's family circumstances, who the recipient lives with, and whether their Rent Assistance is paid with an income support payment, ABSTUDY or Family Tax Benefit. For example, a single person living alone who receives Rent Assistance with their income support payment or ABSTUDY will start receiving Rent Assistance when their rent exceeds the threshold of \$149.60, with 75 cents paid for every dollar until their rent reaches \$432.27. The maximum fortnightly Rent Assistance payable is \$212.00. A single person receiving Rent Assistance with Family Tax Benefit A, who lives with one or two children, will commence receiving Rent Assistance when their rent exceeds the threshold of \$196.42, with 75 cents paid for every dollar until their rent reaches \$528.69. The maximum fortnightly Rent Assistance payable is \$249.20.⁸

The Federal Government has increased Rent Assistance twice in the last few years: an increase of 15 per cent in the 2023-24 was included in the Federal Budget, and an additional increase of 10 per cent in the 2024-25 Federal Budget. Rent Allowance is also subject to indexation. Unfortunately, these increases have not kept pace with the private rental market. The rising cost of living, combined with the lack of affordable housing, means that many private renters reliant on social security income support are in a state of perpetual financial crisis.⁹ Those who are most vulnerable have lost their accommodation or are at risk of homelessness.¹⁰

An increase to Rent Assistance would be a strategic mechanism for getting social security support to those who are particularly financially vulnerable, and an important strategy to address increasing levels of homelessness amidst the current housing and cost of living and housing crises.

Recommendation 1: That the Federal Government review and increase Rent Assistance to adequately support low-income households, including benchmarking Rent Assistance against real rents, with indexing to reflect rental price movements.

8 Current Rent Assistance Rates can be found at <https://www.servicesaustralia.gov.au/how-much-rent-assistance-you-can-get?context=22206>

9 Australian Council of Social Services and University of NSW (2023). *Poverty in Australia 2023: Who is affected?*

10 Davidson, P and Hall, J (2025). *Homes for living, not wealth creation: Tax and expenditure reforms to improve housing affordability and equity.*

Women who are parents and guardians

It's just the burden is on women to receive their adequate payments. So, they're having to provide the birth certificate with the name. They're having to prove that they're separated. They're having to prove that they didn't understand 'whatever the manner of things' ... Women are increasingly shouldering a heavy burden when it comes to the social security system.

- Regional Tasmania



Key Findings

- The structure of social security payments targeting parents and guardians is too complex, comprising many different eligibility requirements and rates of payment – an issue exacerbated by the two distinct systems underpinning income support payments (e.g. Parenting Payment) and family assistance payments (e.g. Family Tax Benefit). This complexity undermines access to social security and increases the risk of social security/family assistance debts for women in regional, rural, remote and very remote (4R) areas.
- Misreporting care arrangements can be weaponised by disgruntled and/or abusive ex-partners to trigger loss of women's payments and/or debts.
- Points of transition linked to children 'ageing out' of payments trigger sudden changes including more onerous conditions and/or a reduced financial support for women, including where they continue to care for their children. These periods are often stressful and can undermine the security of women and their children in 4R areas
- Where children are removed by a government department from a parent or guardian's care, loss of income support can undermine the reunification goals of parents and relevant government agencies.
- Kinship care arrangements relied upon by many First Nations people are not adequately addressed by social security legislation and policy guidelines, leading to a distrust in the social security system, lack of eligibility and significant debts.
- The intersection of child support and Family Tax Benefit continues to cause loss of social security entitlements for women due to poor application of Maintenance Action Test exemptions and assessment of 'child support income' that has not been received.

How do payments related to parenting work?

There are a number of social security entitlements specifically targeted to people with a child in their care. All are income tested, and some are also asset tested. All payments are also affected by whether the person is single or a member of a couple.

Care is commonly provided by parents, however, people with different types of relationships with a child may step up to take on the role of formal or informal guardian. Consequently, this chapter uses the term parent/guardian.

Parenting Payment is the main income support payment available to a person who is the 'principal carer' of a child (*Social Security Act*, section 5). Only one person can be a 'principal carer' at a time, even if care is shared (subsection 8). A person is considered a 'principal carer' if they have primary responsibility for the day-to-day care, welfare and development of a child. That can include parents or others acting as a child's guardian such as another relative or foster carer. Where care is evenly split, the *Social Security Guide* establishes a series of factors to be considered by Services Australia when making a determination about who is the principal carer (section 1.1.P.416).

The rationale underpinning Parenting Payment is that a person who is the principal carer of a child may have limited or no capacity to undertake work. It is usually paid fortnightly although it can be paid weekly to people considered financially vulnerable (*Social Security Guide, section 3.10.3.35*). Parenting Payment has a fortnightly income test, with employment income assessed by taking into account gross earnings received in the previous fortnight. Parenting Payment is not affected by child support/child maintenance income.

Different rules apply depending on whether a person is single or a member of a couple.

Parenting Payment Single (PPS) can be paid until a child turns 14 years old. The PPS rate is higher than the single rate of JobSeeker Payment (JobSeeker), and it has more generous provisions relating to income than JobSeeker. Both the income-free threshold and income taper rate allow people to earn more before they begin to lose any of their payment, and to keep more of their payment for every dollar they earn over the income threshold. The income-free threshold increases for each child.

Once a principal carer's youngest child turns six, PPS is subject to mutual obligations (unless an exemption is granted), requiring that the person seek work and undertake activities contained in their Job Plan, although their mutual obligations are usually less onerous than for people with children aged 14 years and older (see Mutual Obligations below).

As of March 2025, there were 328,790 PPS recipients.¹ More than half of those recipients lived in regional, rural, remote and very remote (4R) areas: approximately 50 per cent regional/rural and seven per cent remote/very remote.² Women comprised 94 per cent of all PPS recipients (308,600).³

Parenting Payment Partnered (PPP) can be paid to a member of a couple until a child turns six years old, noting the payment can be made to only one member of a couple. Both the income test and income-free threshold are the same as for JobSeeker, so harsher than for PPS. The rate of PPP is also affected by a partner's income and assets.

People on PPP are not subject to mutual obligations as mutual obligations do not apply to principal carer parents until their child turns six or starts school.

As of March 2025, there were 59,320 PPP recipients.⁴ Around five per cent of those recipients lived in 4R areas: approximately 37 per cent regional/rural and seven per cent remote/very remote.⁵ Women comprised 90 per cent of all PPP recipients (53,140).⁶

1 Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#). In this data, and other data provided by the Department of Social Services in this report, people who identify as non-binary are grouped with women. For more information, refer to the data classification process described in the Introduction.

2 Ibid (data derived by applying Modified Monash Model to LGA disaggregated data).

3 Ibid.

4 Ibid.

5 Ibid (data derived by applying Modified Monash Model to LGA disaggregated data).

6 Ibid.

Family Tax Benefit (FTB) is a payment designed to assist low-income families with the cost of raising children. It may be paid in addition to an income support payment, such as Parenting Payment or JobSeeker, and can also be paid to working parents and carers on low incomes. Eligibility for FTB requires that a person has a 'dependent child' or dependent full-time student aged 16 to 19.

The rate of FTB depends on income but also the amount of time the child spends in the person's care as, unlike Parenting Payment, FTB can be split between two people. To be eligible for FTB, a person must be providing at least 35 per cent of care for the particular child.

Unlike income support payments, FTB has an annual income test applied each financial year. Payment can be made fortnightly or a lump sum can be paid after the person lodges their tax return. To receive fortnightly payments, the person must estimate their annual adjusted taxable income⁷ for the current tax year and payments are made based on that estimated income. Services Australia then 'balances' or 'reconciles' estimate errors after the person (and their partner) submits their annual tax return or advises Centrelink that they are not required to lodge a tax return.

FTB is divided into two distinct parts – FTB A and FTB B – with many people receiving both. Some people are also entitled to an annual FTB A supplement (currently \$916.15 per child) or FTB B supplement (currently \$448.95 per family) paid at the point of FTB reconciliation.

FTB A

FTB A is paid per child, with the amount paid based on the number of children in the family. A higher base rate is paid for children aged 13 to 15 years, or 16 to 18 years and in full-time study.

FTB A has a complicated set of income tests which change depending on the age of the children.

FTB A includes a concept known as the 'base rate', currently set at approximately one third of the maximum rate. The gap between the base rate and maximum rate can be reduced by child support income, noting people must take action to seek child support to be paid more than the base rate (see below).

As at 27 September 2024, 1,275,020 people were in receipt of FTB A. Of the 702,170 single parent recipients, 88 per cent (616,330) were women.⁸ Of the 572,845 partnered recipients, 82 per cent (470,365) were women.⁹

⁷ Adjusted taxable income may include taxable income, foreign income, tax-exempt foreign income, total net investment losses, reportable fringe benefits, reportable superannuation contributions, certain tax-free pensions or benefits, and deemed income from account-based income streams.

⁸ Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

⁹ Ibid.

FTB B

FTB B is paid per family to single parents and some couple families where one partner earns the primary income and the other has minimal income, currently set at a maximum of \$6789 per annum.

The maximum rate of FTB B depends on the age of the youngest child, with a higher rate paid to parents before their youngest child turns five years old. Parents with a child under five are also subject to a more generous annual income test. FTB B is not affected by child support/child maintenance income.

As at 27 September 2024, 990,095 people were in receipt of FTB B. Of the 680,865 single parent recipients, 602,215 recipients or 88 per cent were women. Of the 309,225 partnered recipients, 248,530 or 80 per cent were women.¹⁰

Women are the primary recipients of FTB A and FTB B, which means they are also largely responsible for regular interactions with Centrelink, including fulfilling reporting obligations, and if something goes wrong, liability for resulting debts, regardless of how funds were expended and who they were spent by.

Real expenditure on FTB has fallen since the payment was introduced in 2000 (replacing payments with a similar focus), with the proportion of families with children under 16 years of age receiving FTB having significantly reduced from around three quarters of Australian families in 2007-2008 to around half.¹¹ This has resulted from a series of measures including:

- Introduction of a new income limit for FTB A end-of-year supplement eligibility
- Tightening of the income limit for FTB B eligibility
- Removal of FTB B eligibility for couples with older children
- Freezing of the payment rate and income test threshold indexation
- Abolition of the Schoolkids Bonus and Large Family Supplement
- Introduction of a waiting period for permanent resident migrants to claim FTB A
- Cessation of Energy Supplement indexation and prevention of new claimants from receiving this supplement.¹²

Other social security payments

There are a range of other social security payments that can be paid to parents.

JobSeeker Payment

JobSeeker Payment is designed as a payment for people who are 'unemployed' and looking for work, or are unable to work due to a temporary medical condition, illness or injury. It is commonly paid to parents who are not eligible for Parenting Payment, for example, a primary carer in a couple whose youngest child is aged six or older. JobSeeker has the same rate and income test as PPP.

¹⁰ Ibid.

¹¹ Klapdor, M. (2022). [Briefing Book Article, 47th Parliament: Social security and family assistance](#).

¹² Ibid.

JobSeeker recipients are generally subject to mutual obligations requiring them to undertake activities which are intended to help them find employment (see Chapter 4: 'Women who are underemployed or unemployed'), although principal carer parents are not subject to mutual obligations when they:

- Are caring for a child aged under six years and who has not started school
- Are providing home schooling or assisting their child with distance education
- Are registered and active foster parents
- Have four or more children aged under 18 years
- Are caring for a child with a disability, temporary illness or injury
- Are experiencing family and domestic violence
- Have recently experienced the death of a family member
- Are caring for a frail aged or disabled adult as well as a child.

Principal carers may also be exempt from mutual obligations due to:

- Temporary incapacity
- Special circumstances
- Being pregnant or having recently had a baby
- Travelling overseas
- Major personal crisis
- Cultural factors, including kinship care and Sorry Business.

Rent Assistance

Rent Assistance is paid fortnightly to eligible people who get an income support payment or FTB. People must pay a minimum amount of rent to be eligible, with the amount differing depending on whether a person is single or a member of a couple. For people who receive FTB, the threshold at which Rent Assistance starts is set higher than for those who do not receive FTB, with the maximum Rent Assistance payable also higher. Thresholds and rates also change if the person has three or more dependent children.

Table 1: Rent Assistance affected by number of children¹³

Eligibility	Maximum Rate
Single, no children - sharing	\$141.33
Single, no children - living alone	\$212.00
Couple, no children	\$199.80
Single or couple - 1 or 2 children	\$249.20
Single or Couple - 3 or more children	\$281.54

¹³ Rates at May 2025. Services Australia (2025). [How much you can get](#).

Other social security payments and support

Other social security payments intended for parents/guardians include Assistance for Isolated Children Scheme, Child Care Subsidy, Additional Child Care Subsidy, Double Orphan Pension, Newborn Upfront Payment, Paid Parental Leave, Parental Leave Pay and Stillborn Baby Payment.

Parents caring for a child with a disability or chronic illness may be paid Carer Allowance and/or Carer Payment. Many people with children are paid other income support payments such as ABSTUDY, Age Pension, Austudy, Crisis Payment, Disability Support Pension, Special Benefit and Youth Allowance.

Issues associated with these payments are not addressed in this chapter.

What is working well?

The social security system is multi-layered, providing financial support to low-income families, particularly while children are young. Means testing is intended to ensure that financial assistance is targeted to those who need it most. For many women, social security and family assistance payments are fundamental to their capacity to feed and care for their children.

A number of reforms have been introduced in the last few years, improving the structure of payments to people with children. These include:

Extension of Parenting Payment Single until a person's youngest child turns 14

The 2023 Federal Budget extended the length of time Parenting Payment can be paid to a single parent, replacing the cut-off from a person's youngest child turning eight years old, to the youngest child turning 14. Given PPS is paid at a higher rate and with a more generous income test than JobSeeker, this change effectively increases single parents' income while they have children younger than 14 in their care. This change is positive but disappointing as it failed to restore the age to 16 years – where comparable payments had set the cut off for decades.

Abolition of ParentsNext

In 2024, the Government abolished the ParentsNext program, a compulsory pre-vocational program intended to support 'vulnerable' parents into study and employment. At the time of its abolition, ParentsNext applied to almost 100,000 Parenting Payment recipients with children aged nine months to six years, who had not worked for six months. About 96 per cent of those in the program were women.¹⁴

Unfortunately, many women subject to ParentsNext reported the program requirements were onerous and difficult to complete, with a Senate inquiry reporting that 55,000 parents received 159,000 suspensions, each lasting an average of five days, between July 2018 and February 2021.¹⁵

14 Hegarty, N. (2023). [Federal government to scrap 'polarising' ParentsNext welfare scheme in next week's budget](#). ABC News.

15 [Parliamentary Joint Committee on Human Rights](#), Parliament of Australia (2021). [ParentsNext: examination of Social Security \(Parenting payment participation requirements – class of persons\) Instrument 2021](#).

Parliament's Select Committee on Workforce Australia Employment Services¹⁶ (the Hill Report) found that the ParentsNext process did not enable accurate assessment of a person's barriers to employment or their goals, with the process adding to the pressures many parents experience caring for young children while not demonstrably improving their employment pathway.

In late 2024, Parent Pathways was introduced as a voluntary, personalised pre-employment service for parents and carers of children up to the age of six years. The program is intended to help recipients plan and pursue their personal, study or work goals.

Mutual obligations satisfied through voluntary work

Since 1 April 2025, all principal carer parents have been able to meet their mutual obligations requirements through paid work (including self-employment) and/or approved study, or a combination of paid work or study with up to 15 hours voluntary work per fortnight. The addition of voluntary work to mutual obligations activities recognises that volunteering may be a more useful and valuable activity for many principal carer parents.

Extension of Parental Leave Pay

Parental Leave Pay was extended from 1 July 2024, with two additional weeks of payment added each year until July 2026. Changes were also made to increase capacity for the sharing of parenting, and an attached superannuation payment was added for parents of babies born or adopted on or after 1 July 2025 – making Parental Leave Pay the only payment in the social security/family assistance system with superannuation attached.

What needs to change?

Complexity of the system

Payments' structure, rates and requirements too complicated

The structure of social security payments available to parents is complex, including numerous different payments with different income tests comprised of different threshold amounts and taper rates depending on a person's circumstances.

For income support payments such as Parenting Payment, JobSeeker Payment and Disability Support Pension, employment income is assessed in the fortnight of receipt. For FTB, income is assessed annually, with people asked to 'estimate' their (and their partner's) income for the coming financial year, and to adjust their (and their partner's) estimates of annual income as the year progresses. The estimation process routinely results in over- or under-estimation of income, requiring that Services Australia 'balance' FTB payments received against entitlement per the person's actual income for that financial year. 'Overpayments' are then recovered or, where there has been an underpayment, outstanding FTB is paid.

For many women, it can be very difficult to accurately estimate annual income for the financial year ahead and avoid an FTB overpayment debt. While the balancing process is par for the course for Services Australia, most people who have been 'overpaid' experience the FTB 'adjustment' as a debt; a personal debt usually incurred by women, with associated stress regarding repayment.

16 Select Committee on Workforce Australia Employment Services, Parliament of Australia (2023). [Rebuilding Employment Services](#).

The process of accessing and maintaining parenting-related payments also creates a significant administrative burden which can constitute impossible hurdles for women in 4R areas – especially women in remote and very remote communities. While there is no specific data available about who within a household is accessing and spending parenting-related

funds, given that the lion's share of payments are made to women, it is apparent that usually women are shouldering this burden – navigating complex evidentiary and procedural requirements to claim payments, then regularly interacting with Services Australia to maintain these payments. That assumption is borne out by the experience of community workers, including EJA Member Centres.

Sometimes male partners refuse to engage with Centrelink, leaving women to troubleshoot payment issues critical to their family income or survive without core income support

We see women shoulder the Centrelink paperwork and the rest of the household admin all the time.

— Remote Northern Territory

We'll provide advice to a woman [about their parenting payments] with some sort of commentary or instructions including, "You'll need to come back to us with copies of these things" but there's all sorts of things that get in the way of that happening. Often it's about their caring responsibilities.

— Regional New South Wales

People aren't getting their full access to Family Tax Benefit because they just give up.

— Statewide Victoria

Sometimes male partners refuse to engage with Centrelink, leaving women to troubleshoot payment issues critical to their family income or survive without core income support.

Men are often just throwing their hands up and saying, "This is just not working". They are getting canceled because mutual obligations are not appropriate, or whatever. And then it's just by process of elimination, the women are having to be the ones to resolve it because the men have just thrown their hands up.

— Remote Northern Territory

You know how they talk about systemic racism in institutions. I wonder about gender as well. The way things are ... it's the mother's responsibility to make sure kids are getting the money for their food. There doesn't seem to be a focus on the other parent that those children are also connected with.

— Very remote Northern Territory

When women claim and are paid a social security payment, they are liable for any overpayments if they fail to advise of a change in circumstances, such as changes to casual earnings or children's care. This results in women being liable for the lion's share of debts arising from parenting-related payments,

regardless of how much control they had over how the funds were used. FTB debts can accrue where partners have refused to provide information, or have provided false information about their income, to their partner or directly to Services Australia, preventing an accurate income estimate.¹⁷ The presumption that families pool resources for the collective good of the household fails to recognise power imbalances in relationships where abuse is present.

The presumption that families pool resources for the collective good of the household fails to recognise power imbalances in relationships where abuse is present

Women come in with social security debts. It just adds more to their financial poverty because they've got a debt that they're carrying ... And it could be a debt that's happened because of a partner but they've ended up carrying it.

— Rural Queensland

Many people have only a basic knowledge of social security and family assistance entitlements and reporting obligations, so may delay claiming or struggle with claim processes, and miss out on payments - or end up with a debt because they do not understand eligibility criteria and reporting requirements, do not know what to ask, and/or find the system too difficult to navigate.

[The conversation] will be like I'm struggling with things, so we talk to them about Centrelink. Most of them aren't aware that there's two different supplements, and you can get childcare assistance, and Family Tax Benefit and things like that.

— Remote New South Wales

My clients don't come to me with [a social security payment] that they want me to help them to apply for. They come to me with the problem of 'things aren't great', and they want me to provide a solution ... And then you start peeling back the onion and you find where the need is, and then you put your tools together. Very rarely does anybody ring up and say, "I want to apply for [whatever payment]". That's not going to happen.

— Rural Queensland

Just making sure they're getting the right payments and stuff ... Her partner had been locked up for the past year and she was registered as partnered, and getting a partnered Parenting Payment [so was getting payment at a lower rate].

— Remote Northern Territory

If Centrelink dupe them, you know, didn't pay someone \$20 of what they're entitled to, they probably wouldn't know where to look it up; their entitlement. They wouldn't know if their payments are right. They just take the money they get in the bank and then they do their best with it ... It's a complex area of law, so we wouldn't expect a great number of people who've got that level of expertise and detail.

— Statewide Australian Capital Territory

17 This issue is covered in greater detail in part three of the *Social Security for Women Outside Our Cities* report series.

Case Study: Mari

I did go to Centrelink once when my kids were little because one of my friends ... was wondering why I hadn't been for the children's payment. And I said, "Well I didn't know anything". She's like, "You should go".

I ended up going and I was told, "You can't have it". I wasn't working. She was a lecturer and was getting it. When I told her, she goes, "No, no, no, no, that's not right. Go back and see them again."

The whole thing wasn't a nice experience because eventually they did give me it and then at the end of that payment they came back and said you shouldn't have gotten it. And then I had to pay it back. But then it was reimbursed back to me because someone in Brisbane found out and said, "No, you are entitled to it".

And the back and forth thing for someone who's not confident in the community as is, was just – "Look, thank you very much but I like to keep it simple."

Services Australia's reliance on digital systems to communicate information can be convenient and has increased access to information for many; however, digitisation of servicing can bar access to Centrelink services and social work support for vulnerable people most in need – including women in 4R areas with no or limited digital access, and no or limited access to face-to-face servicing. Digitisation remains an issue for women without strong digital literacy, noting lack of digital literacy is higher in 4R areas.¹⁸

I feel like sometimes it's just a lack of understanding about what they're eligible for. They can't find information if they're not computer literate. If you know your way around a computer and you can Google, great. But for people who don't have a computer or don't know how to do that or have a language barrier or any number of reasons ...

– Regional Queensland

The Centrelink website is good if you know it's there and you're good at English and all the rest of it. I think there's just no other way of getting that information. The customer service officers just don't have time to explain things. Some of them do, some of them seem great, but it just depends on who you get across the desk.

– Statewide New South Wales

Access to expert staff with time and capacity to explain entitlements remains essential.

18 There is a persistent digital divide between capital cities and other parts of the country. The Digital Ability gap, in particular, remains considerable. Areas outside capital cities recorded a 2023 Index score of 69.8. This is 3.4 points less than the national average, and 5.0 points less than capital cities: Thomas, J., McCosker, A., Parkinson, S., Hegarty, K., Featherstone, D., Kennedy, J., Holcombe-James, I., Ormond-Parker, L., & Ganley, L. (2023). [Measuring Australia's Digital Divide: Australian Digital Inclusion Index: 2023](#).

Fear of the system leaves women without payments

Some women avoid Centrelink because they find the system overwhelming or punishing, or they fear unfounded repercussions from Centrelink.

People will have debts and then will be worried about engaging with Centrelink to obtain a payment that they are absolutely entitled to, because they're worried about repercussions for the debt. So they will just step away and be like, "All right, I just won't engage with Centrelink at all".

— Remote Northern Territory

She said, "I will never do Family Tax Benefit again. It doesn't benefit my children because it affects my mental health. I have that capacity to cope [but] if we're talking about anybody with a disability or anybody that's going through the trauma of DV ... I'll help other people fight their [alleged debt], but I don't have the energy to fight my own."

— Regional Queensland

They won't apply for their Family Tax Benefit or the Childcare Subsidy because they've received a debt in the past. It's impossible to penetrate their fear. It's impossible to work it out. They're too scared and they'll just go "no", and walk away.

— Statewide New South Wales

For women in smaller communities, particularly First Nations women living in smaller communities, fears can be well-founded regarding information about their social security issues being overheard and becoming known in their community. Such information can be used to their detriment, including a community member using it to attack another in a process termed lateral violence.¹⁹

Separation of FTB and income support systems leads to debts

The separation of FTB and income support systems is overly complex for claimants and recipients, and poses significant challenges for administration. Despite Services Australia's digital systems undertaking data matching with other Federal Government departments

(such as the Australian Tax Office and the Department of Home Affairs), the two large IT systems managing income support and FTB data do not share data on reported income.

This lack of IT integration can result in significant income support payment and FTB debts despite women having diligently reported income and changes in circumstances to Centrelink. These debts can be very large if the woman has been receiving payments for a long period, sometimes years.

This lack of IT integration can result in significant income support payment and FTB debts despite women having diligently reported income and changes in circumstances to Centrelink

19 Australian Human Rights Commission (2010). [Chapter 2: Constitutional reform: Creating a nation for all of us](#); Korff, J. (2020). [Bullying & lateral violence](#); Whyman, T., Murrup-Stewart, C., Young, U. M., Carter, A., & Jobson, L. (2024); [Strategies for coping and dealing with lateral violence among Aboriginal people living in south-east Australia](#). Australian Journal of Psychology, 76(1).

She had a massive FTB debt. When she was in a relationship, she would go into Centrelink and report the income every fortnight. She'd tell them every fortnight, so couldn't understand how this debt was raised when she thought she was doing the right thing. Why they couldn't have been able to help this woman on Disability Support Pension who had special needs to ensure that she was doing the right thing, I don't really understand. And then one day someone said to her, "Oh no, you have to provide a tax return". And it was like, she'd never been asked for that.

— Statewide Victoria

I had a client who updated her relationship status for her Family Tax Benefit but that didn't talk to the system that was providing her Parenting Payment, and she ended up with debt.

— Regional Victoria

The consequences of the lack of communication between FTB and income support systems is an issue EJA and our Member Centres have been raising for decades. It is an issue requiring urgent attention to prevent the accrual of debts to women who are communicating their income and changes in circumstances to Centrelink but ending up with debts – an issue that is entirely preventable.

Recommendation 2: That the Department of Social Services review the structure of payments targeting parents, particularly Parenting Payment and Family Tax Benefit, with a goal of developing policy reforms to simplify the system and reduce the system's absolute reliance on annual income-based assessment for payments relating to children.

Recommendation 3: That Services Australia ensure frontline staff are equipped to explain the different structure of payments targeting parents, and assist people to manage their reporting obligations.

Recommendation 4: That the Department of Social Services and Services Australia identify obstacles to communication between family payment and income support IT systems, and develop strategies to address these issues as a matter of urgency.

Harsh points of transition

Parenting-related payment eligibility criteria and rates are inherently linked to the age of dependent children, including a number of points at which children 'age out' of payment or categories of payment, triggering more onerous conditions or a reduction in financial support for their parents. The sudden drop in income can leave women in dire circumstances as they endeavour to continue feeding, clothing and caring for their children on reduced income, often with increased obligations to look for and take up work. These provisions reflect social policy that clearly undervalues unpaid caring work and the benefits for children of having a parent/guardian available to provide care.

There's a whole group of older women like myself ... Mums who have been Mums and then all of a sudden ... they're not getting their payments for their children. You know what I mean? There's that whole group of women who I think would like to contribute or they do contribute - like all that community contribution, which isn't recognised because she can't get a payment by doing all those things.

— Regional New South Wales

Children aging out of FTB

- FTB A can be paid to a person caring for a dependent child aged less than 15 years, and for a young person aged 16 to 19 years if they are studying at high school.
- FTB B can be paid to a single parent until their dependent child turns 16, or from 16 to 18 if they are studying at high school. It can also be paid to a person who is a member of a couple with a dependent child younger than 13 years old, if one person is considered the 'main income' earner and the other person has a very low or no income.

The point at which the young person ages out of FTB prompts a radical reduction in income – up to \$288.82 (FTB A) and \$131.74 (FTB B) – a \$420.56/fortnight reduction for families with some of the lowest incomes in Australia.

I don't know how she survived. I just said, "Hey, you surviving?", and she didn't know to be honest. She said, "It feels as though I'm bludging off my own children just ... to get along each week". That's really disempowering her from when I knew her 15 years ago ... being financially stable. She had her own house to grow all these children up, paying significant rent and all of that. She was more than happy because she was able to get Family Tax Benefit. It was the minute they hit over 15, in small communities like this ... There's no consideration about these women in regard to the Centrelink payments that they're on.

– Very remote Northern Territory

A child who has turned 16 or left school may or may not be able to get Youth Allowance, noting too that parents cannot control if their child applies for income support, or if their child contributes money from their payment to the cost of rent, food and utilities.

Her English is very minimal and she's got a 19-year-old who's refusing to come out of his bedroom and she's been going to Centrelink for him, but because he's 19, she can't get help. She feels like this child needs help because he's wanting to get his own money, he wants to leave the house, he wants to do things but who can help? So, he's just staying in his room.

– Regional Queensland

Children aging out of Parenting Payment Single

Currently, when a youngest child turns 14, their parent/guardian is required to claim another social security payment if they wish to continue receiving income support. Most commonly, women claim JobSeeker Payment.

It was when her youngest turned 14 that things started to go wrong for her. She just couldn't juggle everything with the pay cut.

– Statewide New South Wales

The 2023 Federal Budget extended the length of time Parenting Payment Single (PPS) can be paid to a principal carer by increasing the threshold age of the person's youngest child from age eight to age 14. While this change was welcome, it falls short. EJA and other peak organisations have long advocated for the return of the age 16 threshold for PPS, consistent with comparable earlier versions of PPS – for example, Sole Parent Pension.

New claim delays

Transitioning from one payment to another is not an automatic process, requiring that a person claim a new payment, then wait for the claim to be processed. Processing delays can result in interruptions to income which, for people living fortnight to fortnight with no savings, can have serious repercussions.

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Delays may relate to the woman/parent's new claim, for example an application for Jobseeker Payment or Carer Payment after her youngest child has turned 14. Delays can also relate to a child who has aged out of FTB, where the young person claims Youth Allowance but there is a gap between the last FTB payment and first Youth Allowance payment.

I've had a couple of people recently whose kids just turned 18, so they're going onto their own payment or it's changing in some way and then it stops them, but they haven't gotten their payment yet. So then there's this gap in the system where they're now suddenly a payment down for a child. Their kid's not getting anything either, so they can't balance things on that reduced income from Centrelink and it's just because they're waiting and they'll get back paid. But it's like that gap of well, what are they going to do for a month?

— Regional Tasmania

Continuity of payment is critical for parents to be able to care for their children, including retaining secure housing, particularly where the parent/guardian is a sole parent/guardian.

Recommendation 5: That the Federal Government amend section 500D(2) to increase the qualifying age limit for Parenting Payment Single, from the youngest child of a principal carer being age 14 to age 16.

Recommendation 6: That the Department of Social Services and Services Australia review policy and procedural guidelines to identify and address issues that can disrupt income support continuity where a person loses eligibility for parenting-relating payments and needs to transition to another payment.

Requirement to seek work while caring for children

Prior to 2006, Parenting Payment and its predecessors included no mandatory requirement to look for and undertake paid work. Now, principal carer parents are subject to mutual obligations once their youngest child turns six, whether or not the person is single or a member of a couple. This can represent a significant burden for women required to shift from a primary focus on caring for their children, knowing that failure to fulfil mutual obligations can result in their payment being suspended, reduced or cancelled.

Mutual obligations requirements are fundamentally problematic for primary carers because they undervalue the unpaid work involved in caring for children and a household

The social security system has a number of measures in place that aim to ease the transition:

- Mutual obligations requirements are managed under the Points Based Activation System (PBAS), which applies points to specific mutual obligation activities. Requirements for principal carer parents of children aged six to 16 years are reduced, with the default 100 point per month target lowered to 60 points. Under section 3.11.8 of the *Social Security Guide*, parents cannot be forced to take up employment of more than 15 hours per week. Parents also cannot be required to travel more than an hour each way to undertake mutual obligations activities, or to undertake activities outside school hours. Parents are not required to meet any mutual obligation requirements during the fortnight when the Christmas Day public holiday falls.
- Services Australia is required to interview principal carer parents around the time their youngest child turns five years and nine months (with two weeks' leeway either side) to alert parents to, and discuss, their pending part-time mutual obligation requirements.

Despite these measures, many women struggle to accommodate mutual obligations requirements, particularly while their children are young, increasing pressure on mothers who are working to fulfil essential parenting roles while on modest (or lower) incomes. Women also continue to report that they are required to attend appointments at inconvenient times, without access to transport, and to participate in activities they do not find beneficial – 'busy work' that does not help them improve their economic security.

For women in 4R areas, mutual obligations requirements can be particularly challenging as they do not adequately take into account structural barriers to employment, including limited employment opportunities, the casualisation of the workforce, lack of (affordable) childcare and family-friendly workplaces, lack of training opportunities, and poor digital connectivity. For many women in remote and very remote areas who have limited support services and no employment opportunities these barriers are compounded.

Mutual obligations requirements are fundamentally problematic for primary carers because they undervalue the unpaid work involved in caring for children and a household, including where people are dealing with family and domestic violence, psychological or cognitive issues, access to very limited resources, or children's health or behavioural issues. This runs counter to the Government's 2024 *Working for Women: A Strategy for Gender Equality* which committed to explore 'how social security settings (along with tax) can more comprehensively recognise the economic participation

of those performing unpaid care.²⁰ This issue is particularly pertinent for sole parents, but also applies to women in many couple families, noting that while Australian men do more housework than they did 20 years ago, their contribution remains 50 per cent less than women.²¹

EJA seeks the removal of compulsory mutual obligations and introduction of supportive measures for primary carer women who want assistance preparing for and finding employment. Such efforts could be modelled on the rationale underpinning the recently introduced voluntary Parents Pathways program which aims to support 'parents to identify their future aspirations, including their education and employment goals, to progress towards secure work which fits with their caring responsibilities'.²²

In the short term, exemptions from mutual obligations during school holidays could reduce the burden on principle carers subject to mutual obligations, noting parents often incur costs and lose free time during school holidays.

Recommendation 7: That the Federal Government undertake legislative and policy reform to remove compulsory mutual obligations requirements from primary carers, replacing them with supportive measures to help find employment, modelled on the rationale underpinning the new voluntary Parents Pathways program.

Care of children

Reporting changing care arrangements can be onerous

When couples separate, making arrangements about their children can add complexity. Even in a relationship where separation is amicable, attitudes and behaviours can change after separation – including where the parent/guardian without primary care realises the other parent/guardian is receiving a higher rate of income support and all or most of the FTB, and/or they are required to pay child support.

Whenever care arrangements change – including loss of care or a change in percentage of care – Services Australia must be notified within 14 days. For a parent, monitoring and notifying changes to percentages of care can be onerous and stressful, particularly where changes are frequent, where abuse from the other parent continues post-separation, or where other difficult circumstances are occurring at the same time. If not done methodically, late notification can result in significant overpayments, an issue community workers frequently encounter.

Notifying changes to percentages of care can be onerous and stressful, particularly where changes are frequent, where abuse from the other parent continues post-separation, or where other difficult circumstances are occurring at the same time

20 Department of the Prime Minister and Cabinet (2024). [Working for Women: A Strategy for Gender Equality](#).

21 Melbourne Institute of Applied Economic and Social Research (2024). [The Household, Income and Labour Dynamics in Australia \(HILDA\) Survey, GENERAL RELEASE 23 \(Waves 1-23\)](#).

22 Department of Social Services (2024). [Social Security Guide – 3.11.11 Parent Pathways](#).

My client left her violent partner, taking her three children with her. He kept demanding additional days with the kids and threatening to stop paying child support unless he was given more time with them. He was psychologically and physically abusive throughout. She tried to keep Centrelink up to date and she really thought that she had, but then she got a letter saying she owed \$17,000.

— Statewide New South Wales

It is common for separated parents of teenagers to tell us that their teenage children move between their home and the home of their ex-partner in a very flexible way, with no particular schedule, and the client has not usually kept accurate records of these movements.

— Statewide New South Wales

Domestic violence and weaponisation of government systems

It is not uncommon for arrangements about children to be at the centre of disputes post-separation, including parents seeking unrealistic parenting orders from the Family Court or insisting on private arrangements about care of children designed to punish the other party. To maximise their social security entitlements and ‘punish’ a former partner, non-custodial parents may also pressure women to make false statements to Services Australia, using threats of violence or restricted access to children as leverage.

The unexpected cancellation of a social security payments can be extremely stressful, particularly when it is the consequence of ongoing family and domestic violence

We’ve got a client who we’re supporting at the moment, where she’s potentially quite likely to need an urgent [Family Court] application. The court will be needed but there’s pressure [from the other parent] being put on her to go and tell Centrelink that he has got 50/50 care of the child.

— Rural South Australia

It is not uncommon for false claims about percentage of care to be made directly to Services Australia,²³ including percentage of care arrangements being weaponised by perpetrators to prolong family and domestic violence post-separation.

The *Family Assistance Guide* states that where there is disagreement about care arrangements, ‘it is important that all carers of a child have the opportunity to provide verification of care’. Where a new carer claims FTB, Centrelink should confirm the situation with the previous carer (section 2.1.1.30). The *Social Security Guide* also states that care should be taken when making a shared care determination, which will result in a change of principal carer (section 1.1.P.416). EJA Member Centres and others report that confirmation is not always carried out.

Even where there’s Family Court orders on the system showing who’s got care of the kids, they’ll take the person ringing up on the phone and their word for it. For a service that requires so much evidence for everything else, it’s just one part I’ve never understood.

— Regional Western Australia

²³ Economic Justice Australia (2021). [Debt, Duress and Dob-ins: Centrelink compliance processes and domestic violence](#).

The unexpected cancellation of a social security payments can be extremely stressful, particularly when it is the consequence of ongoing family and domestic violence. It can then be emotionally taxing and administratively expensive for the person to obtain evidence to get their payment reinstated or their rate corrected.

It's kind of like they're guilty until proven innocent. We cut your payment off and you have to jump through all the hoops again to provide us the evidence that this is the situation ... For so many people, that's their only form of income. They're on the back foot right away. Then, their automatic payments [for other goods and services] don't come out, so the flow on effect of that decision takes 10 times the effort to rectify. It's a really penalising way of dealing with it, particularly for someone who's already in that vulnerable position. They don't ask any questions, they just cut it off 'til they get the information. So, particularly around the parenting side, the person making those reports usually isn't in a place of vulnerability. It is essentially another form of systems abuse.

— Regional Western Australia

Sometimes a person will remove a child from the care of the 'principal carer' without legal authority or consent, then notify Centrelink that they are the principal carer. In such instances, section 1.1.P.414 of the *Social Security Guide* includes provisions to address 'disputed care arrangements' affecting income support. As long as 'the principal carer' takes reasonable steps to recover care of the child, the person remains the child's principal carer during the period of absence, so their income support payments (e.g. Parenting Payment) should continue. These provisions also prevent payment to the person who has removed the child. Separate provisions relate to the continuation of FTB. Under section 2.1.1.90 of the *Family Assistance Guide*, payment of FTB can continue for up to 14 weeks. This system relies on parents knowing it is worth their effort communicating the non-consensual removal of the child and having confidence/capacity to do so, and that information will be appropriately actioned by Services Australia staff.

Loss of social security undermines efforts to reunify child and parent

Where a child is removed from a person's care by a government department over child safety concerns, the parent/guardian immediately stops being the carer/principal carer of a dependent child for social security purposes, resulting in loss of eligibility for parenting related income support payments and FTB,

and often a significant reduction in Rent Assistance. This loss of income can then be exacerbated by the need to cover additional costs, such as travel associated with access visits. Research by Anglicare in 2018 revealed that for parents working towards reunification, the extra costs of paying for their child's needs during access visits could not be met while on JobSeeker.²⁴

Unlike the provisions above addressing the temporary removal of a child without permission by another parent, there are no provisions to continue payment for a child temporarily removed from a parent/guardian by the State. This is a social policy failure, given reunification is the stated goal of government and usually desperately sought by parents.

The parents of children who have been removed have often been living below the poverty line. Poverty is known to have a direct effect on situations of neglect and abuse through material deprivation as 'parents face challenges buying support and development opportunities for themselves and their children, and indirect effects through poverty-related parental stress.'²⁵ Removal of children is a particularly significant issue for First Nations families, noting First Nations children aged zero to 17 years comprise 6.9 per cent of the Australian general population, but 44.5 per cent of children aged zero to 17 years in out-of-home care.²⁶

Service providers report that state child protection agencies do not always communicate or are slow communicating child removal to Services Australia, including in cases where parents have been unable to notify.

Sometimes parents have had their children removed and are still accidentally being paid a full payment because they're in rehab or they're incarcerated. The prisons seem quite good. They're doing that notification ... But when Child Safety supports a young mother into another service, even a mental health support service, nothing happens [to stop her payment]. It's not until Mum gets out that she realises - she's now been cut off or has a debt because she doesn't have her baby anymore. She was supposed to report that but she's been in hospital for 12 weeks or otherwise incarcerated. It's like the Child Safety notification doesn't get acknowledged by Services Australia. They don't action that thing ... She's been cut off and she's got a debt.

— Regional Queensland

24 Fidler, L. (2018). [In Limbo: Exploring income and housing barriers for reunifying Tasmanian families](#).

25 Ibid.

26 Productivity Commission (2025). [Proportion of children in out-of-home care \(0–17 years old\) that are Aboriginal and Torres Strait Islander](#).

The stress of a social security debt then combines with the trauma of child removal as the woman is left with less money to live on while trying to 'prove' the home environment is adequate for reunification.

So I do have a number of women who have had debts raised against them ... such as women who have had children removed from their care for a period of time [although] our work in the legal practice is getting the child reunified. The debt has been raised either because they [haven't notified Centrelink that the child has been removed] as a protective measure to maintain housing, either knowingly or unknowingly receiving the wrong payment. They've thought the reunification would happen a lot quicker than it's happened. Sometimes there's been something that's thrown a spanner in the works, such as there's been a drug screen that's come back positive, which has meant that child protection hasn't agreed to the reunification process until [court] proceedings. And what can happen is Centrelink cut them off and then they have a whole big issue trying to get JobSeeker quickly, and then we find out that there's a debt as well. That has been really a big issue over the last couple of years for my practice.

— Statewide Victoria

Numerous service providers raised the issue of delays in women's payments being reinstated once they regain care of their child. This delay places enormous stress on families as they actively work to demonstrate that they can provide for their children.

We had a situation where a mother had her children removed under an informal parenting agreement with the Department of Child Safety. Her payments were cut immediately. Then the children came home but it was six weeks before [her payment started again]. Now that's not fair. To go six weeks without any form of income is not fair.

— Rural Queensland

I've had cases where I've been contacting child protection saying, 'We need you to let Centrelink know' because [the agencies are] not talking. Even though I've had the lawyer provide Centrelink with a letter saying the child is reunified, they've still said that they need evidence. Then child protection is saying, 'No, we do provide evidence', but they don't do it immediately. That's a reality. Payments were cut off really quickly, but [Centrelink is] not being notified ... and they're not getting that reinstatement of payment.

— Statewide Victoria

We've had two young people that have had quite severe mental health issues and had their babies removed at birth and gone into a mental health facility to deal with the postnatal depression. Baby's gone into foster care. They've come out and they've got no money because no notification happened. They've got less than no money. They've surrendered to the process, but the process hasn't supported them.

— Regional Queensland

Part of the problem lies in the structure of social security law which requires that a person is already a 'principal carer' or already has a 'dependent child' before they can be eligible for Parenting Payment or FTB. This prevents people successfully claiming these payments before the child is in their care; a problem compounded by the lag for claim processing, leaving vulnerable and desperate parents without funds at a time where it is essential they can establish a safe and functioning home.

Review of legal, policy and administrative provisions is required to find a solution to this problem, including the need to re-examine the interface between social security and state-based child welfare systems to better meet the needs of vulnerable children.

System not responsive to informal care arrangements

Problems arising from care arrangements are recurring issues for First Nations women because kinship care is common practice. Often informal carers include relatives and close friends, with costs shared by the community. This model does not fit within social security definitions of principal carer, principal residence, and dependent child.

In the country there may be far fewer childcare options or support options. Sometimes, maybe the only way out is to engage family members in a way you might not have to if you lived in a suburb like mine that's got 15 childcare centres or whatever.

— Statewide New South Wales

What I have come across a few times is payments taken away from women, Parenting Payment and Family Tax Benefit, when the child is in temporary care of another family member. And then when the child is reunified with the Mum, that other family member is very slow or hasn't notified Centrelink, and it can often be a very complicated family relationship that presents. It's really problematic leaving Mum with a kid in her care on JobSeeker Payment or whatever.

— Statewide Victoria

Setting Parenting Payment rules as 'all or nothing' does not reflect the reality for people in a lot of communities. Why can't it be split like FTB?

— Remote Northern Territory

The social security system includes numerous provisions to address short-term absences of children from a parent, and also kinship or family care. Some of these relate specifically to First Nations people, including:

- Specific measures can be applied to Torres Strait Islander people's traditional child rearing practices (*Kupai Omasker*) to inform qualification for Parenting Payment. These recognise that children may remain with an extended family member permanently, and that information about those arrangements would usually be kept confidential between the parties involved; a practice legally recognised by the Federal Circuit and Family Court of Australia. The *Social Security Guide* allows a carer, who is not the natural parent, to qualify for Parenting Payment as long as no person with legal responsibility for the child is also living in the same home or providing care for the child (section 3.5.1.20, *Social Security Guide*).
- Temporary suspension of mutual obligations for a principal carer receiving JobSeeker Payment who is a relative (but not parent) of the child, and cares for the child in accordance with a Federal Circuit or Family Court order, or a document prepared or accepted by the relevant state authority responsible for the welfare of children (section 3.11.5.30, *Social Security Guide*).

While these provisions are useful, they fail to adequately account for parenting and kinship practices within First Nations communities.

I guess the fundamental thing is that a Western understanding of how a child is raised doesn't match with a First Nations understanding of how a child is raised. So, Mum and Dad (or biological Mum and Dad) in a Western world are considered to be the main caregivers for a child. In First Nations communities, that may or may not be the case. Often it's not just Mum and Dad; it's a much broader spectrum of people who will be heavily involved in caring for a child, whether that's aunties, uncles, grandmas; and often there's periods of time where Mum and Dad maybe are less involved and step back and other people are more involved. I think that poses a difficulty for clients because ... they get caught out as not having been caring for the child, even though in their view it's like, "Well, I am still caring for the child. It's just that there's also other people involved." It's not that they've abandoned the child, which is a word thrown around a bit in that kind of space. [Instead], there's a period of time where someone else is taking up the caregiving role. So, from Centrelink's view, that person isn't caring for the child, but from that person's view, they're like, "Well, no, I am".

— Remote Northern Territory

There's a lot of shared care – grandparents care one day, aunties care the next.

— Statewide Queensland

Here, care of children away from their parents is more likely to be with extended family, and those arrangements might be quite fluid. So, this person might be caring at this point in time, but another person might take that on at this point in time. That's really common. Generally, it's more fluid here because people have all sorts of stuff going on that we are not aware of. They've got cultural responsibilities, they've got ceremony, they've got all sorts of things going on. [Their childcare arrangements are] not that black and white but the system's not flexible, and so it really doesn't meet people's needs.

— Remote Northern Territory

The mother might leave the child with family for a few months but she's thinking, 'I'm still 'Mum'. I'm still involved. Just the child's not at my house.'

— Remote Northern Territory

EJA Member Centres also referred to cases where a person has been getting a payment for their child, and passing that on to their relative who is acting as primary carer for their child – a practice the existing system cannot accommodate.

She sought advice about [her relative's] debt, but it turned out her instructions included a reference to the fact that she has a kinship care arrangement for her niece, formed after her brother died, because his partner wasn't coping. But the partner, who's also Aboriginal, is continuing to claim Family Tax Benefit and is giving that money to our client to look after her child, which [is not allowed under social security law]. But that's an arrangement they've made and I think it's partly a lack of understanding of how the system works. They can't see why there's a problem with that.

— Statewide New South Wales

In some cases, it's just families prefer to have the informal arrangement of, 'Well, the parent gets the money'. The parent will just give the money to the new carer straight away.

— Remote Northern Territory

The consequences of such practices can be sizable social security and/or FTB debts. At worst, the debt can constitute the total amount of Parenting Payment paid over a period, the full amount of FTB, and the additional Rent Assistance they have been receiving. Depending on how long the period of the changed care arrangements is, these debts can be significant, at times exceeding \$100,000.

The poor fit of social security provisions to kinship care arrangements poses challenges not only for recipients but also Services Australia staff who are tasked with fitting these arrangements into social security policy and procedural guidelines, including staff who day-to-day rely on the Operational Blueprint. Aboriginal families, particularly women, bear the brunt.

The [Services Australia] staff member is asking, 'How much do you have care of that child?' And the person is saying, 'I have it sometimes, my Auntie has it sometimes, I have it sometimes, my Auntie has it sometimes.' And the staff member then basically started making conclusions, saying something like, 'Oh, so you have her 80 per cent and your Auntie has 20 per cent.' Then the woman says the same thing again. Then, 'Oh, you have it 90 ... And eventually the staff member reaches a conclusion that is wrong. [In my case,] my client didn't actually say that. She didn't report that. I got [a copy of] the call and transcribed it. It's different to what the person wrote down. [The case is now at the Administrative Appeals Tribunal, and] that's going to be the key piece of evidence that informs the decision. It's actually, it's someone's interpretation of conversation.

— Remote Northern Territory

The consequence of Parenting Payment and FTB debts, particularly those raised as a result of clash between cultural concepts of parenting, can lead to a reluctance to engage with Centrelink, with significant consequences

It's not always super-duper clear what the situation [and what evidentiary documents are required] but we definitely don't want to deter families from creating their own family arrangements because families know what's best for their young people in their family.

— Remote Northern Territory

The consequence of Parenting Payment and FTB debts, particularly those raised as a result of clash between cultural concepts of parenting, can lead to a reluctance to engage with Centrelink, with significant consequences.

It has [led to] this quite astronomical debt, and has meant that this person feels uncomfortable dealing with Centrelink in any capacity, whether it's in relation to debt, or whether it's in relation to receiving payments for themselves [or] for their children. It just had a really negative impact on the way that they want to engage with Centrelink ... which is tricky because then it leads to things like other people alleging that they're living in an impoverished state and that they then can't look after their children because they can't afford to (or that kind of thing), which obviously in everyone's view, it shouldn't become a child protection concern.

— Remote Northern Territory

Recommendation 8: That Services Australia review the Operational Blueprint to preclude decisions being made about change of care arrangements without confirmation from both parents/ guardians, including where decisions are made by Centrelink or Child Support.

Recommendation 9: That the Department of Social Services consider avenues to provide a form of transitional parenting-related income for a period following child removal by a government authority to assist parents to maintain housing and undertake other efforts towards reunification.

Recommendation 10: That the Department of Social Services and Services Australia identify means for a person to be paid Parenting Payment or Family Tax Benefit on the day they reunify with/ regain care of a child.

Recommendation 11: That Services Australia work with state government agencies to develop mechanisms to provide timely alerts prior to a person leaving an institutional setting with the expectation that they will regain care of their child, so the person may be paid Parenting Payment or Family Tax Benefit on the day they reunify with/regain care of a child.

Recommendation 12: That the Department of Social Services and Services Australia review provisions relating to kinship care, with the aim of ensuring the social security system is responsive to kinship care practices in First Nations communities.

Impact of child support on social security entitlements

The child support system was introduced in the late 1980s to address poverty in single mother households, providing an administrative mechanism so that parents would not have to go to court to pursue child maintenance. Nearly one million (960,950) Australian children under 18 years were the subject of child support arrangements at the end of March 2025,²⁷ with child support obligations exceeding \$4 billion each year.²⁸ Child support remains highly gendered. Women comprise 84 per cent of 'payees' (485,760 of 581,800) and 12 per cent of payers (69,195 of 584,355).²⁹

The child support system intersects with the social security system in a number of ways.

Maintenance Action Test exemption not accessible enough

People are required to seek child support under the Maintenance Action Test (MAT) if they wish to access their full entitlement to FTB A. Those who do not take action have their FTB A reduced to the base rate, a reduction of up to \$217.56/fortnight.

Exemptions are divided into two categories:

- **A full exemption** from the MAT is available – although the content of policy provisions leaves some ambiguity regarding whether it is available to those using Agency Collect system (administered by Services Australia), or also to those using other systems (see below).
- **A partial exemption** is available to people using Private Collect or where there is no child support assessment in place but the other party has been voluntarily paying child support. The partial exemption allows Services Australia to assess only the child support funds the person has actually received. When a partial exemption applies, the person must notify Services Australia whenever a change is made to the amount of child support received as Services Australia does not have oversight of payments. The partial exemption option does not apply to people going through Agency Collect because Services Australia can see how much child support is being paid.

The *Family Assistance Guide* outlines reasons for exemption at 3.1.5.70. Although similar in approach, the reasons for a general exemption and a partial exemption are worded slightly differently.

27 This is a decrease on first quarter data from the last five years, noting that from 2021 to 2023 the number exceeded one million: Department of Social Services (2025). [Child Support Program Data – March 2025](#).

28 Ibid.

29 Ibid, noting total parents includes those where no gender is recorded.

Table 2: Comparison of general and partial exemptions - Maintenance Action Test³⁰

General Exemptions	Partial Exemption
if they fear that taking action to seek child support will cause the payer to react violently towards them or their family	has a fear of violence
where seeking child support may have a harmful or disruptive effect on them or the payer	there is risk of harmful or disruptive effects
if there are cultural considerations that adversely impact on the individual's capacity to take reasonable maintenance action	there are cultural considerations to take into account
where there are other exceptional circumstances	there are other exceptional circumstances that make it unreasonable for them to pursue the collection of their full entitlement or to transfer collection method to Child Support

Of particular concern is the use of the term 'will cause the payer to react violently' as a reason to provide a general exemption, compared to the more realistic 'fear of violence' for a partial exemption. Given Services Australia cannot know that an action will cause violence, 'fear of violence' is EJA's preferred term. Ideally these sections would use identical language to simplify the Guide and ensure greater consistency of interpretation.

The *Family Assistance Guide* is also unclear as it states that 'Individuals may be granted a full or partial exemption from the MAT in the circumstances described above in column 1 for general exemptions', but then includes the modified list (column 2) under the headings 'Partial exemptions from the MAT – private collect cases' and also 'Partial exemptions from the MAT – no child support assessment in place' (at 3.1.5.70). Simplification of section 3.1.5.70 would provide greater clarity and certainty for both community workers and Services Australia staff.

Numerous service providers report that Services Australia is usually open to granting a MAT exemption in situations of domestic violence, particularly where advocates are involved. However, some report that clients have struggled.

30 A full list of exemptions is available at Department of Social Services (2023). [Family Assistance Guide – 3.1.5.70 Exemptions from the maintenance action test](#).

Some clients, they've left [their home] and have to claim child support or the exemption. That's still a very big process and it's very triggering for women ... They have to have so much evidence to support even the exemption being considered. Copies of domestic violence orders or police incidences. Some women, as we know, don't report. They don't have that paper trail. They're having to ask family and friends to write statements, stat decs; it's not a trauma-informed process at all ... And there's a lot of shame. Where's the dignity for a woman to say this is what I've experienced and I'm rebuilding now with my children, but I've still got to keep reliving that to jump through the hoops. Otherwise, her payments are cut off.

— Regional Queensland

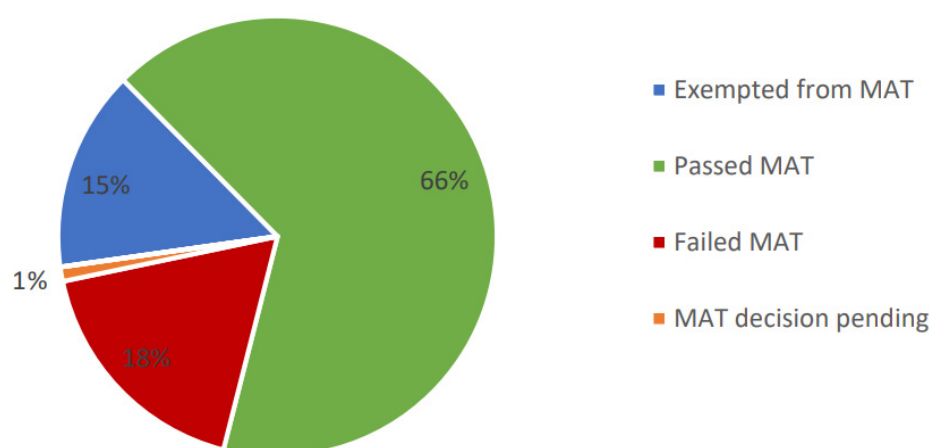
We see problems around getting the full amount of Family Tax Benefit paid. They've got this issue of child support assessments either not being made or Centrelink are not providing maintenance exemptions. Yeah. I had a client last year where they kept insisting, even though the father hadn't been present for a very long time ... and he actually died, and they still weren't paying it. It's just not taking women's word for it and basically, making it really difficult.

— Statewide Victoria

Data on child support applications processed in the March 2025 quarter show 67 per cent of the children of people subject to the MAT had 'passed' the MAT, 15 per cent had parents exempted from the MAT, and 17 per cent had parents who had failed the MAT. That means that approximately one in six parents who claimed child support during that period were eligible for only base rate FTB A until taking further action, which they may or may not have done. It is unclear what circumstances the 17 per cent figure includes, or how effectively Services Australia interacted with parents regarding the MAT to ensure maximum rate FTB could be paid.

The Department of Social Services sets a key activity measure threshold of at least 85 per cent of FTB A children of separated parents meeting the MAT, as a measure of the effectiveness of the Child Support Scheme ensuring that 'children continue to receive support from their parents following separation'.¹³ That measure was not met in 2022-23 or 2023-24.

FTB Part A children – applications processed March 2025 quarter by Maintenance Action Test (MAT) Category³¹



One of the main issues we've had is child support because they apply for Centrelink [payments] when they have a baby, and they're getting their full payments, and then Centrelink say to them, 'Oh, you have to approach the dad to get child support'. And then they never do that. Mostly there's domestic violence and they don't ever tell Centrelink that there's domestic violence and their payments get cut in half.

— Remote Northern Territory

A very typical example is that we would have clients come to us that have left a domestic violence relationship. They're not receiving the correct Family Tax Benefit. They're on the base payment because they don't want to claim child support from the other party for fear of retaliation or fear that he's going to then come and take the children because he [thinks he] may as well be getting the benefit of Centrelink as opposed to her. So, we've got lots of regular experience assisting the client to gain exemptions from that to be able to get back on the right payment.

— Regional New South Wales

What we see is women not knowing you have to apply for child support to get FTB A and you can be exempt from it. This is what you need to do to get that exemption so that you are entitled to the full amount ... The exemption to allow a woman to get that additional Family Tax Benefit is important so that people don't need to put themselves at risk of harm by trying to claim child support from somebody that may respond badly and put them or their children at risk of harm.

— Statewide New South Wales

I've got a case that's just come through overnight of someone who can't get Family Tax Benefit because they're not collecting child support. I think the way that it's set up is very difficult to manage because not all Centrelink staff are properly trained or maybe they don't give Centrelink recipients all the information at the right time.

— Statewide Australian Capital Territory

³¹ Data derived from Department of Social Services (2025). [Child Support Program Data – March 2025](#).

No one seems to know about maintenance action test exemptions.

— Statewide New South Wales

Services Australia staff have a critical role to play identifying and supporting people to claim child support or access a MAT exemption.

I think a lot of women, by the time they come to us, they've been dealing with a family violence situation for a long time and a lot of my clients will minimise the family violence; have a hard time explaining their situation. So that, I've found that's a challenge. They don't necessarily think it's bad enough, even though they could be at the very high end of the high risk, but it's quite hard to advocate for yourself.

— Statewide Victoria

They told them about [the MAT exemption] at the time they first went in, but that was just kind of a form to ... fill out and give it to us in three months' time. They often just don't understand. It wasn't really explained properly that their payments would be cut that much. And they cut by 50 per cent or something like that. It's quite a substantial cut.

— Remote Northern Territory

The Department of Social Services is currently reviewing the interactions between the Child Support Scheme and FTB in response to Recommendation 7 of the Joint Select Committee on Australia's Family Law System's *Third Interim Report* and their own data. The Department has commissioned a Survey of Separated Parents who have 'failed' the MAT and other research surveying parents who have Private Collect child support arrangement or an exemption from the MAT.³² EJA awaits findings from that research and associated recommendations to reduce the number of people on base rate FTB A due to MAT failure.

Assessment of child support does not reflect funds received

It is not uncommon for 'payers' to minimise their income to reduce their child support liabilities by hiding income, paying irregularly or not paying at all. Some weaponise the child support system to perpetuate financial abuse post-separation.³³

I've recently had an example of a lady who wasn't paid maintenance for 10 years. She's been fighting this for 10 years because he's putting in that he's unemployed or owns his own business [and only] earns \$40,000 a year, yet drives around in a Porsche and pays a thousand dollars a week rent.

— Statewide Victoria

For 18 years. He would skip employers after 10 weeks because he knew that at the twelfth week, Centrelink would get onto him for child support. So, he would literally go country and then come back and do that cycle again, over and over.

— Remote Northern Territory

32 Department of Social Services (2024). [Annual Report 2023-24](#).

33 Cook, K., Byrt, A., Burgin, R., Edwards, T., Coen, A., & Dimopoulos, G. (2023). [Financial abuse: The weaponisation of child support in Australia](https://figshare.swinburne.edu.au/articles/report/Debts_and_disappointment_mothers_experiences_of_the_child_support_system/26252723); https://figshare.swinburne.edu.au/articles/report/Debts_and_disappointment_mothers_experiences_of_the_child_support_system/26252723 Cook, K., Goodall, Z., McLaren, J., & Edwards, T. (2019). [Debts and disappointment: mothers' experiences of the child support system](#).

There are two ways in which child support income can be assessed to calculate social security entitlement:

- **Entitlement method:** The amount of child support a person is entitled to receive each financial year based on the child support assessment or a court order, regardless of whether it is actually received.
- **Disbursement method:** The amount of child support the person actually receives each month.

Many community workers and their clients are unaware the disbursement method is available, with EJA Member Centres commonly advising in this area where women have received little or no child support for extended periods

The disbursement method is useful for those who do not know how much child support they are likely to receive or when they are likely to receive it. However, many community workers and their clients are unaware the disbursement method is available, with EJA Member Centres commonly advising in this area where women have received little or no child support for extended periods.

I know there is the alternative way of assessing maintenance income if your child support is erratic, but it doesn't seem to be very well-known or talked about.

— Statewide New South Wales

I think it's prolific that women can't get the appropriate Family Tax Benefit they're entitled to because of continual systems abuse around percentage of care because you've got the perpetrator disputing that, so it continually leaves the mother in a precarious situation ... We always advise, 'Get Child Support to collect'.

— Statewide Victoria

The disbursement method is available to people using Agency Collect who have not been granted a general MAT exemption. A comparable approach is also available to people using Private Collect, or without a child support assessment, who have been granted a partial MAT exemption. EJA Member Centres have previously successfully advocated for application of a partial exemption per section 3.1.5.70 of the *Family Assistance Guide* which states:

The partial exemption enables the individual to collect whatever they can privately without the full deemed amount being applied.

Unfortunately, section 1.1.D.100 suggests otherwise, stating:

The disbursement method ... can only be used for child support liabilities that are registered for collection by Child Support. The disbursement method cannot be used for FTB recipients who collect their child support through private collect arrangements.

Attention is needed to these two contradictory sections (as well as text relating to full and partial exemptions in section 3.1.5.70) to provide clarity and greater certainty for staff seeking to address the impact of non-payment of child support on payees' FTB. In EJA Member Centres' experience, it is particularly common for people using Private Collect to lack knowledge that their FTB assessment can be adjusted.

There is growing willingness in government to address the intentional withholding of child support. The issue is on the radar of the Office for Women, Services Australia, the Department of Social Services, the Australian Tax Office, and others undertaking an audit of the weaponisation of government systems to perpetuate domestic violence. Meanwhile, child support-based abuse remains prevalent.

We see women where, he hasn't done his tax return for five years. He knows it's going to cause a problem. It's like a setup and then when it happens, it's a disaster for her.

— Regional Queensland

I don't think it's a stretch to say that's a form of family violence; the withholding and then using the system to perpetrate family violence.

— Statewide Victoria

EJA continues to advocate in this area, including work to inform the Government's efforts to increase support to victim-survivors of domestic violence, to address systems abuse by perpetrators of domestic violence, and to improve the social security/child support interface.

Recommendation 13: That Services Australia make available findings from their research into Maintenance Action Test 'failure' data, and undertake evidence-based reform to reduce the number of women stuck on base rate Family Tax Benefit A.

Recommendation 14: That Services Australia undertake a review of all cases of people currently receiving only base rate of Family Tax Benefit A as a result of the Maintenance Action Test, and provide assistance to those wanting to take action to receive their maximum social security entitlement, whether by pursuing maintenance or seeking an exemption.

Recommendation 15: That the Department of Social Services amend the *Family Assistance Guide*, particularly sections 1.1.D.100 and 3.1.5.70, to provide clarity around Maintenance Income Test exemptions and the disbursement method of child support assessment.

Recommendation 16: That Services Australia review processes for delivering information to customers about the Maintenance Action Test to ensure the test, exemptions, and the consequences of not pursuing child maintenance are fully understood.

Recommendation 17: That Services Australia review processes for informing customers about the disbursement method of child support assessment (and associated provisions for people subject to Private Collect arrangements) to increase understanding among customers and community service providers, with a goal of increasing uptake where full child support is not being received.

Recommendation 18: That the Federal Government expedite reforms based on the findings of the weaponisation of government systems audit.

Women with disability and chronic illness

If they're not on [Disability Support Pension], they're on JobSeeker, so they're having to continuously provide doctor's certificates to say that they can't actually work because of the disability, while they're also 'not eligible' for the DSP, so just ... they never get a break.

- Regional Queensland



Key findings

- Disability Support Pension (DSP) eligibility criteria and claim process are overly complex, creating barriers that impede access to DSP for women living in regional, rural, remote and very remote (4R) areas.
- Access to the medical treatment and evidence required to establish DSP eligibility is in short supply in 4R areas, with specialist evidence sometimes unobtainable.
- Where appropriate medical services exist, prohibitive costs can preclude those in the most vulnerable circumstances from accessing evidence required to establish DSP eligibility.
- The Program of Support (POS) requirement delays access to DSP, sometimes indefinitely, disproportionately affecting women unable to secure timely medical treatment and evidence, and those who are juggling care responsibilities that create obstacles to POS completion.
- Limited face-to-face services and issues with digital connectivity in 4R areas disproportionately affects women with chronic illness or disability, including women with complex care responsibilities and women experiencing family and domestic violence.
- Some community workers and medical professionals in 4R areas lack understanding of DSP eligibility criteria, policy guidelines and claim process, limiting their capacity to assist clients and patients to collate evidence to support DSP new claims and appeals against refusal.

How are women with disability and chronic illness supported by the social security system?

Financial support for those unable to work is a cornerstone of Australia's social security system. EJA recognises that many people with a disability or chronic illness can work, want to work, and do work; however others are unable to work, can work only a few hours a week, or can work only sporadically when their disability or health allows. It is vital that the social security system's legislative framework, policy guidelines and servicing structures are fit for purpose in regional, rural, remote and very remote (4R) areas where there are higher levels of chronic disease¹ – especially within First Nations remote communities – and limited access to chronic disease management services.²

¹ Australian Institute of Health and Welfare. (2024). [Rural and remote health](#).

² Ibid.

Disability Support Pension

The primary income support payment targeting people with chronic illness or disability is Disability Support Pension (DSP). As of March 2025, there were 823,005 DSP recipients.³ More than half of those recipients lived in 4R areas: approximately 48 per cent regional/rural and five per cent remote/very remote.⁴ Women comprised 47 per cent of all recipients (387,080).⁵

DSP eligibility requirements are set out in section 94 of the *Social Security Act*, and in the associated Impairment Tables. Criteria include that the person:

- has one or more conditions that have been 'diagnosed, reasonably treated, and stabilised', with no significant improvement likely within the next two years.
- has conditions that can be assigned 20 points or more from at least one of the 15 Impairment Tables, each of which relates to a specific area of functional impairment – for example, spinal function, brain function, mental health function, and physical exertion and stamina.⁶
- has a 'continuing inability to work', defined as being unable to work 15 or more hours per week.
- meets additional non-medical criteria, including residency and age requirements.

People who meet 'manifest' medical rules regarding severe or terminal conditions⁷ can be granted DSP on the basis of medical evidence alone. They are not required to satisfy the section 94 rules.

Evidence of diagnosis and treatment is established for each impairment by considering medical evidence from the claimant's treating doctor. Specialist evidence is also required for certain conditions. For example, mental health conditions require documentation from a registered psychologist or psychiatrist, including the specifics of diagnosis and treatment, and the extent to which the symptoms have been stabilised. Evidence of hearing impairment may require evidence from an ear, nose and throat (ENT) specialist, neurologist or neurosurgeon. Medical evidence is then reviewed and assessed by a health or allied health professional, known as a Job Capacity Assessor, employed by Services Australia to undertake a Job Capacity Assessment (JCA).

3 Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#). In this data, and other data provided by the Department of Social Services in this report, people who identify as non-binary are grouped with women. For more information, refer to the data classification process described in the Introduction.

4 bid (data derived by applying Modified Monash Model to LGA disaggregated data).

5 Ibid.

6 Impairment tables are not contained in the *Social Security Act* but in a separate determination – the *Social Security (Tables for the Assessment of Work-related Impairment for DSP) Determination 2023* (Cth).

7 That includes people who are permanently blind, who need nursing home-level care, who have a terminal illness with life expectancy of less than two years, an intellectual disability with an IQ of less than 70, category 4 HIV/AIDS or receive a Veteran's Affairs Disability Compensation Payment at the Special Rate (totally and permanently incapacitated).

The Program of Support requirement

People who are assessed as having 20 points or more spread across multiple Impairment Tables, but not 20 points or more on a single table, are required to complete an additional step to establish eligibility – known as a Program of Support (POS). This typically applies to people with multiple conditions or comorbidities, many of whom have impairment ratings that far exceed 20 points in total.

Community sector clients regularly report their experience of the POS as a taxing obligation that is not useful for increasing their employability because they are unable to work

The POS is not a set 'program', instead referring to the requirement that the person has participated in 'mutual obligation' activities intended to help them overcome barriers to workforce participation. These may include:

- training and education
- skills development
- practical support managing disability in a workplace context
- connections to health and other support services.

A person required to undertake a POS is referred to a POS provider through either Workforce Australia, Disability Employment Services (DES), Australian Disability Enterprises (ACE), Community Development Program, or Parent Pathways.⁸ They must then complete mutual obligations while remaining on activity-tested payments such as JobSeeker Payment or Youth Allowance. In theory, the job plan is tailored to include mutual obligation activities to assist them towards employment, but community sector clients regularly report their experience of the POS as a taxing obligation that is not useful for increasing their employability because they are unable to work.

The POS requires that a person has active participation for at least 18 months during the three years prior to the person's DSP claim being granted. If a person on an activity-tested payment, such as JobSeeker Payment or Youth Allowance, is temporarily unable to work at least eight hours a week due to illness or impairment/symptoms associated with their disability, they may provide a medical certificate and seek a temporary incapacity exemption from the POS. Temporary exemptions do not count towards the 18-month requirement. It is possible to be exited from a POS but this appears to happen rarely (see page 68, below).

Supplementary payments

Smaller supplementary payments are available in some instances, including:

Mobility Allowance, a fortnightly payment for people unable to use public transport without a lot of help to support travel for paid work, voluntary work, self-employment, education or other activities associated with preparation for work, independent living or life skills training.

⁸ Active participation in ParentsNext (which ended on 31 October 2024) can be included in a POS until 1 November 2027.

Essential Medical Equipment Payment, an annual payment to help support energy costs resulting from essential medical equipment or cooling used for medical needs. It is paid at \$196 for each item of equipment and/or heating/cooling required.

Pensioner Education Supplement, a fortnightly payment to help with the ongoing costs associated with study (noting many DSP customers are studying, including some who are still at high school). It is paid at \$62.40/fortnight for a study load of 50 per cent full time or more, and \$31.20 for a study load of less than 50 per cent full time.

Continence Aids Payment Scheme, an annual payment to help meet costs associated with continence and continence-related products. It can be paid annually or bi-annually, with the 2025-26 rate set at up to \$717.10 per annum.

Pharmaceutical Allowance, a fortnightly allowance to help with the costs of medication. The fortnightly rate is \$6.80 for a single person or \$3.40 for a person who is a member of a couple.

What is working well?

The 2023 Impairment Tables

Revised Impairment Tables introduced in 2023 include several improvements, and address many of the issues raised by EJA and other advocates regarding the previous iteration of the tables:⁹

- Assessment criteria have been amended from a stringent requirement that a condition be ‘fully diagnosed, fully treated, and fully stabilised’ (emphasis added) to the more meaningful ‘diagnosed, reasonably treated, and stabilised’. This change recognises that a condition may be treatment-resistant, or that for many people treatment may continue to improve their condition but not in any significant way. Also, people may have limited access to optimal treatment options, including for reasons related to where the person lives. Further, some conditions may never be ‘fully stabilised’, but the ongoing impairment and/or intermittent symptom flare-ups may prevent work or severely limit work capacity.
- Evidentiary requirements for psychological conditions have been relaxed, allowing registered psychologists to provide evidence where previously only clinical psychologists or psychiatrists could do so. Given the severe shortage of mental health specialists in 4R Australia, this change is a step towards increasing access to medical evidence.
- A number of practical amendments were made clarifying concepts and adding examples relating to functional impairment (e.g. reference to ‘local facilities’ was expanded to specifically include local shops or workplaces), and modern examples of work-related tasks were added.

The Impairment Tables now better reflect a contemporary understanding of disability and impairment, acknowledging the real-world barriers that people with disability encounter when attempting to participate in the workforce.

⁹ Social Security (Tables for the Assessment of Work-related Impairment for DSP) Determination 2023 (Cth).

Improved DSP rejection letters

Services Australia has recently undertaken a review and improvement of DSP rejection letters. These now provide clearer information about why claims were unsuccessful, helping people understand what evidence they need to provide in appeals or subsequent DSP claims. This may go some way towards addressing a common problem where a person learns about different elements of DSP eligibility criteria only when described in successive rejection letters.

Extension of medical exemptions from mutual obligations

Another recent positive change is the extension of medical exemptions from mutual obligations for people who remain on JobSeeker Payment (or another working-age payment) – an extension from 13 weeks to up to two years. For people with disability who cannot access or are waiting to access DSP, this change significantly reduces the burden and stress of regularly obtaining medical certificates, then submitting and seeking approval for successive 13-week periods, when no improvement is likely. This is particularly relevant to women in 4R areas who face challenges accessing healthcare providers. While welcome, EJA remains concerned that long-term medical certificates may wreak havoc with POS requirements (see pages 62 to 70, below).

What needs to change?

Inaccessible and overly complex DSP eligibility criteria

DSP criteria and claim process too complex

The DSP eligibility criteria and claim process are complex, with the result that DSP is inaccessible for many.

It is not uncommon for our clients to have struggled with the system for many years, sometimes upwards of a decade. They have lodged multiple unsuccessful applications, have limited to no understanding about why they were unsuccessful, have doctors and others telling them they should be on DSP, but it is not until they have had a conversation with a caseworker at our centre that they actually understand what is needed for a successful application, what was missing from their previous applications, and whether there is any hope for them in an appeal or new application. Centrelink has never taken the time to explain what was wrong or missing or needed, or when they do try and explain it, it is in standard Centrelink terms with no reframing and explaining to make sure the client understands.

— Statewide New South Wales

I know of people [who] have been trying for years and just having difficulty with evidence and kind of navigating that process.

— Regional New South Wales

Centrelink officers don't understand it. And when I've had clients who have asked Centrelink officers or [an] Authorised Review Officer to explain why a decision is made, their response has been, "It's not my job. I don't have to explain it to you."

— Statewide New South Wales

As well as regularly advising people on DSP matters, EJA Member Centres also work with community workers who assist their clients to access DSP. As a means of managing demand, some Member Centres have developed systematic approaches to support DSP claims through community legal education and IT-based client support, facilitated through philanthropic or other non-government funding.

Welfare Rights Centre NSW provides an annual DSP training program for community workers. Demand is high, noting registrations have been steadily increasing each year - with 406 workers trained in 2023, and 643 workers trained in 2024. Additionally, the centre has developed a Community of Practice to upskill disability advocates on DSP eligibility criteria, medical evidence requirements, and associated processes. The Community of Practice involves participation in a two-hour introductory course, a four-hour workshop, then monthly 90-minute meetings that include further training and discussion of participants' casework.

That's the level of basic training and commitment needed to assist clients to navigate the DSP process. Participants are always astonished to discover exactly how much they do not know about the DSP system. They walk in desperate for training and desperate for understanding and leave universally being able to assist a larger number of clients than before, and to more effectively ... do so.

— Statewide New South Wales

Community of Practice participants report that after participating in the program, their ability to help clients is 'more savvy', and that they refer colleagues to Welfare Rights Centre NSW resources because there is no available resource developed by Services Australia to teach community workers what is needed for a DSP claim.

Social Security Rights Victoria has taken a different approach, developing an online platform, DSP Help; a resource developed through a two-year human-centered design process. DSP Help provides accessible guidance tailored to people's specific circumstances to assist in navigating the complex DSP eligibility rules, as well as with claim and appeals processes.

The criteria are so complex that many services – including ours – are going to great lengths and expense to develop resources just to communicate what someone actually needs to provide to get onto the DSP. Many of these projects wouldn't be needed if the criteria and messaging were clearer. We're proud of what we've made, but the fact we had to at all speaks volumes about the system.

— Statewide Victoria

The reality that community legal centres, whose primary purpose is casework support, have stretched their resources to provide (third-party) DSP training and support systems to address unmeetable casework demand, points to the urgent need for simplification of claim process and additional capacity within Services Australia to support DSP claimants and appellants.

Lack of assistance to claim and gather documents

Community workers report frustration with Services Australia frontline staff's hands-off approach to DSP claims, noting the DSP claim form includes 144 questions,¹⁰ written in what one provider described as the "language of Centrelink".

In the form they ask the same question every second page: "Are you receiving any Centrelink payment? What is your CRN number?" And it's like ... Didn't I just do that two pages ago? And it's complex. If you're asking people to fill in any of those sorts of forms, they're complex. And the people we [work with] don't understand the terminology or they can't read the terminology or the questions. They don't know. What is that? I mean, what is a CIF or a CRN or REF? What are those things?

— Regional New South Wales

10 Services Australia (2024). [Claim for Disability Support Pension form \(SA466\)](#).

The claim process also requires provision of medical evidence that must address very specific eligibility criteria, depending on the nature of the illness or disability (covered in more detail below). Services Australia's Operational Blueprint outlines the process staff should follow when a person's DSP claim

is rejected, which includes that staff should attempt to contact the claimant by phone and explain the general medical rules and the reasons the claimant did not meet the relevant criteria. Despite this guidance, service providers report that women often come to them with no idea why their DSP claim was rejected.

Service providers report that women often come to them with no idea why their DSP claim was rejected

Many of our clients have never received an explanation of the DSP medical criteria from Centrelink, or anybody else, despite repeatedly making applications over the years, leaving them confused and overwhelmed by the process.

— Statewide Queensland

I don't think I've ever seen Centrelink actively help someone get onto the DSP. When Centrelink are contacting doctors, at least in my experience, it's to find a reason to reject them.

— Statewide Victoria

EJA Member Centres and community partners report that many women in 4R areas struggle to understand DSP eligibility criteria and navigate claim process. Services Australia has some information on its website but does not provide detailed guidance to help claimants work through DSP eligibility criteria and step them through claim process. While Services Australia's frontline staff can provide an assisted claim service, this does not appear to include assistance to understand and submit required documentation beyond the DSP claim form.

Services Australia social workers are able to provide some support to customers navigating the DSP claim process, but community workers report it can be difficult to access specialist Services Australia staff to seek additional support.

There is a significant gap in terms of service for those trying to apply for DSP. They face difficulties finding a service that offers ongoing assistance filling in DSP forms and gathering supporting documents. Clients have told me that Centrelink's social workers provide very limited help in this area. They may need more than one-time support because their disabilities restrict them from gathering documents and completing the forms adequately.

— Statewide Western Australia

We have asked Centrelink to help the client complete the DSP claim form but they help only with the claim form. There is no assistance with more than just the form. There is no assistance with proactively seeking out evidence. And somehow the person still needs to get the form for Consent to Disclose Medical Information (SA472) completed themselves and sent in.

— Statewide New South Wales

Workers from many different types of community organisation report spending time assisting women to complete DSP claim forms because their clients are unable to do so themselves. This often occurs despite social security support not being the service's focus and not being funded for that purpose.

It remains luck of the draw whether a person is able to locate someone who can assist them, with many women relying on family or friends

A lot of our clients, as well as the trauma they're experiencing, a lot of them will have an acquired brain injury, often from domestic violence, or they might be on the autism spectrum or have an intellectual disability, mental health concerns, things like that.

— Regional New South Wales

Even where Services Australia has both legal authority and the consent of the person seeking DSP, staff are unlikely to take efforts to assist the person to gather medical evidence. Certain assessments, such as Job Capacity Assessments or Health Professional Advisory Unit consultations, may involve Services Australia contacting a medical practitioner to verify information but these processes seem to be inconsistently applied.

It remains luck of the draw whether a person is able to locate someone who can assist them, with many women relying on family or friends. In the absence of supports, women are left to attempt claims by themselves, which leaves them at great risk of falling between the cracks.

Slow processing of DSP claims

Services Australia has a key performance indicator set at 80 per cent or more claims being finalised within 84 days of claim lodgement.¹¹ The complexity embedded in DSP eligibility and claim process contributes to long DSP claim processing times, noting that in 2023/24 DSP claims averaged 91 days. Services Australia has worked to reduce processing times, noting that at 31 March 2025, DSP claim processing for 2024/25 had reduced to an average of 58 days.¹²

Clients are waiting for months and months for claims to be finalised. They contact Centrelink, and are told the claim is being processed and that there is nothing more that they need to do. They lodge complaints about the delay and are told it is being prioritised and still a month or more later they have no outcome. By the time they receive the rejection, significant time has passed since the application was lodged. They then appeal the rejection to an ARO [Authorised Review Officer] and will not uncommonly wait up to 12 months before receiving an ARO decision.

— Statewide New South Wales

I went in and spoke to Centrelink with my client [and discovered] her DSP application had been sitting for 12 months with nothing happening to it. It was sitting with a Subject Matter Expert and had just sat there for the last 12 months not doing anything.

— Regional New South Wales

¹¹ Services Australia (2024). [Annual Report 2023-24](#).

¹² Data provided to EJA by Services Australia, June 2025.

[My client] rang and said, "I've just had a phone call from Centrelink and I don't understand ... They rang me and said that all my husband's information was wrong and that they needed another copy of his birth certificate, his passport." Now, her condition has completely declined and we're trying to get updated information to submit because her information is now 18 months old.

The reported DSP claim processing times relate to original claim determinations; they do not include additional wait times where a claim is rejected

— Regional New South Wales

[My client] said, "Look, I'm going to all these appointments and doing all the right things. I'm seeing a clinical psychologist and seeing the dietician, seeing all these people, but it's all the money and I'm not working and my husband's having to do lots of stuff at home."

— Regional New South Wales

The reported DSP claim processing times relate to original claim determinations; they do not include additional wait times where a claim is rejected, then eventually granted after Authorised Review Officer (ARO) or Administrative Review Tribunal (ART) (formerly the Administrative Appeals Tribunal) appeals. They are likely also 'reduced' by the rapid rejection of claims, without adequate scrutiny, as a result of automated triaging processes.

We are seeing "auto rejection" of claims within 24 to 48 hours where they've been lodged without any medical evidence. Clients are no longer afforded any time to submit medical evidence after lodging the claim. We didn't see claims being rejected overnight until the last year or so.

— Statewide New South Wales

Little productive effort to identify women who should be on DSP

Community workers report a general sense of frustration at the lack of assistance from Services Australia to help identify women in 4R areas who should claim DSP, including women who lose entitlement to Parenting Payment and who are then advised to claim JobSeeker Payment when it is known that they have a disability or chronic illness(es).

There's no sort of thing with Centrelink going, "Well okay, I can see here that you're on such and such [payment]... and you have this medical issue so maybe you should be on the DSP." People should be able to access all that information.

— Statewide New South Wales

Why isn't [Centrelink] helping? Why aren't they saying, "Okay, yep, let's look at the bigger picture of what's happening. You're entitled to this, there's this payment, there's this, there's Rent Assistance." They don't make it easy. They don't get information out there ... It's so hard. And if [the woman has] had to travel to come to the big town here to do their grocery shopping, to get all their medicines and do everything and then go back, it can make a massive impact. And yet nobody tells them these things. Centrelink doesn't tell you, it's almost like they just don't want you to know.

— Regional New South Wales

They're so formulaic. You've got these payments and you just get slipped into a box of whatever that might be, but you might not fit neatly into JobSeeker or DSP.

— Statewide New South Wales

It's just "Keep reporting, keep trying to apply for jobs", which they're too unwell for, or "Keep trying to get those medical certificates from your doctor".

— Regional New South Wales

Services Australia has a number of specific measures in place to prompt staff to identify where DSP may be an appropriate payment. When a JobSeeker-trained Services Australia officer codes a medical certificate provided by an employment service provider, they can consider whether an Employment Service Assessment (ESAt) or an invitation to claim DSP is required. If the person's ESAt suggests they may be eligible for DSP, the computer system prompts DSP staff to call the customer to discuss that option. In some circumstances where there is evidence that a customer may be medically eligible for DSP, Services Australia staff can upgrade an ESAt to a Job Capacity Assessment, prompting a letter to be sent to the person about possibly claiming DSP.

Community workers report a general sense of frustration at the lack of assistance from Services Australia to help identify women in 4R areas who should claim DSP

Community workers spoke of clients presenting after receiving a letter from Centrelink or being told by staff that they may be on the wrong payment and should lodge an application for the DSP. In some cases, letters appear to have been auto-generated after a person has had medical exemptions from mutual obligations, for JobSeeker Payment or Youth Allowance, for a number of months or years. Despite being well-intentioned, these efforts can be counterproductive without a process for Centrelink staff to discuss DSP eligibility and claim process with the person.

People then proceed to lodge applications, often with no medical evidence, thinking that Centrelink believes they are eligible so it will be granted as soon as they lodge. They use nothing more than medical certificates as their medical evidence and they do not understand why their applications are rejected. They end up very confused and angry.

— Statewide New South Wales

Women with chronic illness and disability stuck on low-rate payments

It is not uncommon for women in 4R areas who have a chronic illness or disability to struggle to access DSP despite being completely unable to work or unable to work more than a few hours a week. Those who cannot access DSP,

but who require income support, must then claim and demonstrate eligibility for another payment – generally either JobSeeker Payment or Parenting Payment.

This issue is particularly acute for First Nations women, who experience significantly higher rates of chronic conditions than non-Indigenous women – including diabetes, cardiovascular disease, kidney disease, and mental health conditions which tend to commence at a much younger age and occur with greater severity. First Nations women are also more likely to experience multiple chronic conditions simultaneously.¹³ These same women often face substantial barriers to healthcare and specialist services, particularly in 4R areas, resulting in a compounding disadvantage where those most likely to need access to DSP face the greatest obstacles to access, so remain stuck on low-rate payments.

DSP offers people with a chronic illness or disability substantial advantages over other working-age payments. Firstly, DSP is paid at a higher fortnightly rate, has a higher assets test limit, and has a higher income threshold and taper rate, so that regardless of circumstances, a person receiving DSP would be paid more than if they were receiving JobSeeker Payment or Youth Allowance. There is also a considerable difference between the benefits offered by the associated healthcare cards, with the Pensioner Concession Card linked to state and territory government-based reductions to public transport, council rates, utilities and vehicle registration.

Many people with a ‘partial capacity to work’ receive payments other than DSP – including JobSeeker Payment, Parenting Payment Single and Youth Allowance (other). In this context, ‘partial capacity’ refers to a person being unable to work or undertake training for at least 30 hours per week.

Those most likely to need access to DSP face the greatest obstacles to access, so remain stuck on low-rate payments

13 Australian Institute of Health and Welfare (2025). [Closing the Gap targets: key findings and implications](#).

Table 1. Partial capacity to work¹⁴

Payment type	Recipients	Recipients with partial capacity to work	Percentage of total
JobSeeker Payment	75,020	360,570	41
Parenting Payment Single	147,195	23,145	16
Youth Allowance (other)	98,470	10,135	10

Data is not publicly available regarding the degree of 'partial capacity' affecting recipients' reduced work capacity, but the figures above include people with severely reduced capacity – some of whom have had their DSP claim(s) rejected, and/or remain on the payments above while undertaking a POS.

The Government is well-aware there are many people on payments other than DSP, particularly JobSeeker Payment, whose capacity to work undermines the likelihood of them finding full-time employment. For those people, JobSeeker Payment is unlikely to be a short-term option. Payment rates reflect this understanding, noting changes in the 2023–24 Budget extended higher JobSeeker rates to people aged 55 from the previous threshold of age 60. Maximum fortnightly rates for single people aged over 18 are as follows.

Table 2: Comparison of Maximum Fortnightly Rates¹⁵

Payment type & category	Rate
JobSeeker Payment	\$781.10
JobSeeker Payment – Aged 55 years to 67, after 9 months unemployed	\$836.50
JobSeeker Payment – Partial capacity to work (Less than 15 hours/week)	\$836.50
Disability Support Pension	\$1051.30

The social security system has also undergone a series of reforms to specifically address limited work capacity, including reduced mutual obligations for people unable to work 15 to 29 hours a week, and further reduced mutual obligations for those unable to work 0 to 14 hours a week. Critically, DSP – like its predecessor, Invalid Pension – does not include an obligation to look for and undertake paid work.

There have been recent mutual obligations policy reforms affecting older people who have not yet reached Age Pension age, noting the Age Pension qualifying age has increased incrementally. Currently, people aged between 55 and 67 are subject to reduced mutual obligations arrangements,¹⁶ with different conditions applying depending on whether a person is:

¹⁴ Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

¹⁵ Rates correct as at May 2025.

¹⁶ Services Australia (2025). [If you're 55 or older](#).

- Age 55 to 59 years – with less than 12 months on current income support
- Age 55 to 59 years – with 12 months or more on current income support
- Age 60 or above.

The complexity of the system presents significant challenges for individual people trying to understand where they may fit. It is also challenging for Services Australia and employment service providers to implement – each being tasked with distinct but overlapping roles and responsibilities in the assessment of work capacity, development of job plans, and monitoring of mutual obligations. Meanwhile, significant numbers of people are stuck on long-term payments that are inadequate both in terms of rate and associated obligations.

DSP rules not fit for 4R experience

Community workers consistently highlight that DSP assessment criteria fail to accommodate the realities of women in 4R Australia. These criteria inform Services Australia’s decision-making, but also decisions of the Administrative Review Tribunal. EJA’s recent review of Administrative Appeals Tribunal (as it was previously called) decisions about the social security entitlements of women in 4R Australia found consideration of 4R factors was the exception rather than the rule (see pp106-109 [Social Security for Women Outside Our Cities: Service Delivery Barriers](#)).

It is apparent that the Impairment Tables used to assess DSP eligibility were designed with urban contexts in mind, where public transport, healthcare facilities, and community services are more available. In 4R communities, especially in remote communities, these assumed supports are often difficult to access or non-existent, creating a disconnect between assessment criteria and lived reality.

The Impairment Tables generally use ‘lifestyle’ criteria to assess the way impairment would likely impact a person’s capacity to work. For example, the capacity to sit for specific periods of time fails to take into account the strenuous effort some women may have to make just to undertake basic activities or to access basic services – for example, travelling several hours for a medical appointment or to reach a specific service because there is no other option.

Oh yeah, there’s no understanding of what it’s like for people in some of these places, and what people have to do to get by. There really needs to be more nuance when impairments are considered. Maybe the client managed to do some work on his property, but maybe, living out in East Gippsland, it was either push through that or lose one of the few assets he has.

– Statewide Victoria

When you’re looking at the rules to show that you are impaired to a degree that would prevent you from working, some of the questions are, ‘Can you sit for half an hour? Can you drive a car for half an hour?’ And when you’ve got to drive for 20 minutes to get to the end of your driveway ...

– Statewide New South Wales

Asking clients if they are able to use public transport as a way of gauging their impairment against the tables makes for an awkward conversation when there is no public transport available. You are asking them to theorise what their capacity would be if they lived somewhere ... these services existed.

— Statewide New South Wales

We had a client who told us they had appealed their rejected DSP application and needed to drive to attend a meeting in person. They lived in a regional area and the drive took 45 minutes to get somewhere they could attend. At the meeting, the person told them that because they were able to drive 45 minutes to attend, they were not able to get 20 points as the severe impairment level was capped at 30 minutes or less.

— Statewide New South Wales

For First Nations women living in 4R communities, there can be a profound disconnect between DSP assessment criteria and the impact of disability and health conditions on their daily lives, including a failure to account for the intersection of cultural obligations, caring and community responsibilities. Assessment criteria do not address the intersection of reduced capacity and cultural obligations around Sorry Business, ceremony, and extended family caring responsibilities which may further restrict availability and capacity for work. Additionally, the assessment process may not account for historical trauma, experiences of racism in healthcare systems, and cultural concepts of wellness that affect how First Nations women present their symptoms and functional limitations for assessment.

Disclosure of private health information during face-to-face servicing

Health-related information is generally protected by strong privacy provisions, yet people are put in situations where they are forced to disclose private health information in open-plan offices.

It's in a local community and everybody knows everybody, and you're also in the same office as Medicare and other services.

— Statewide Victoria

Patients struggle to talk to their GP about their health issues especially when it impacts their continence or reproductive systems. Having to talk about these issues or present information about these issues in a small community or an open-plan office means that people otherwise eligible for the DSP will never be approved as they will never raise them.

— Statewide New South Wales

The situation also occurs, or can be exacerbated, when Centrelink services are delivered by an Agent working in another organisation's premises.

The privacy and confidentiality around those Agents in small towns just does not exist. So you'd go in to explain the really personal nature of your Disability Support Pension application ... and then it's in your local council where it's your neighbour or your family and friends walking past.

— Statewide New South Wales

It can be extremely uncomfortable for women to disclose, or overhear, personal information communicated in the open space of a Centrelink Service Centre, or even smaller Agent or Access Point. Privacy concerns can be particularly pressing for First Nations women in small community settings where everyone knows everyone. Additional to a reluctance to disclose sensitive information to a government officer, discussion of certain health conditions can have implications for cultural standing, family relationships, and community dynamics that extend far beyond the immediate service interaction, leading to a reluctance to disclose information critical to assessment of social security entitlement.

Services Australia is currently engaged in a redesign process to improve Centrelink offices, including the creation of an environment that enables disclosure and discussion of personal information. This is an area that requires urgent attention, as discomfort in Centrelink offices, including lack of privacy, has consistently been raised during EJA research (Chapter 1, [Social Security for Women Outside Our Cities: Service Delivery Barriers](#)).

Inaccessibility of digital systems

Many women living in 4R Australia struggle to access face-to-face Centrelink services given their geographic location. Further, community workers report that digital systems are inaccessible to many women applying for DSP.

Discomfort in Centrelink offices, including lack of privacy, has consistently been raised during EJA research

I'm thinking about a young person in Doomadgee with rheumatic heart disease, who should've been on DSP but was not even on a payment because she couldn't contact Centrelink.

— Statewide Queensland

People feel left behind with the push for digital processes. More face-to-face assistance is essential to overcome digital barriers for those less literate or experiencing disabilities that prevent them going through the whole claim process and issues with uploading documents.

— Regional Western Australia

We had a client that we were requiring some medical records for, and we needed them to have My Health Record function as part of the myGov website. For them to be able to do that themselves was next to impossible.

— Statewide New South Wales

I think it's definitely harder for older women who might not quite be at Age Pension age, but they might not have used laptops and phones before. I feel like tech issues are a big thing.

— Regional New South Wales

This issue is addressed in greater detail in [Social Security for Women Outside Our Cities: Service Delivery Barriers](#), noting recommendations to ensure access to digital support, phone or face-to-face services where needed.

Recommendation 19: That the Federal Government undertake legislative reform to simplify Disability Support Pension eligibility criteria.

Recommendation 20: That Services Australia undertake a user-focused review of the complexity of Disability Support Pension claim forms with the aim of making them as simple and intuitive as possible, while prompting people to supply all relevant evidence.

Recommendation 21: That Services Australia staff promote an assisted claim process to assist people requiring support to complete the Disability Support Pension claim form and associated forms, and to provide proactive assistance by suggesting and seeking evidence.

Recommendation 22: That Services Australia identify people with chronic illness or disability receiving other payments, and engage in discussion with them to gauge whether they are likely to be successful if they claim Disability Support Pension before a claim is lodged.

Recommendation 23: That Services Australia ensure administrative processes and forms are available for people who are unable to effectively make use of digital technologies to claim Disability Support Pension.

Access to medical treatment and evidence

Medical services limited and difficult to access

Challenges accessing healthcare outside metropolitan areas are well-documented, described by the National Rural Health Alliance (NRHA) as a 'triple healthcare disadvantage': poorer social determinants of health, limited service availability, and higher costs of access and delivery.¹⁷

Case Study – Colleen

Colleen is a woman in her 60s who has lived her entire life in a very remote Aboriginal community. As a child, she contracted polio which left her with significant permanent physical disabilities that have severely limited her mobility throughout her life.

Despite being visibly and functionally unable to work, and living in a community with extremely limited employment opportunities, Colleen has been unable to access DSP. Colleen's community has no health services, complicating her ability to obtain the required medical documentation.

Colleen remains on JobSeeker Payment, struggling to satisfy fortnightly mutual obligation requirements: applying for jobs, attending telephone appointments with employment services, and reporting any income. She cannot access a telephone signal other than when the local land council outreach service visits her community, making reporting requirements extraordinarily difficult.

Colleen experienced an incidence of family violence and wasn't safe. A women's group from the local land council offered to take Colleen to safety in another remote community, a 12-hour journey on unsealed roads without telephone or internet access. Colleen was reluctant to leave despite the immediate danger because she was due to do her mutual obligations reporting by phone the following day. She feared losing her only source of income if she failed to report on time.

The women's group spent six hours on the phone to Services Australia, who repeatedly told them Colleen had to report the following day, saying 'Just call us from the road'. They kept explaining, 'We can't do that'. Only after she had complied with her mutual obligation requirements did Colleen agree to travel.

Ideally, Colleen would have been offered an exemption from mutual obligations, which would have temporarily halted any need to interact with employment services, to attend an employment services appointment, or look for work – allowing time for her to travel, re-locate and settle into her new location. That option is theoretically available to a person in Colleen's circumstances, but was not offered here.

17 National Rural Health Alliance (2023). [Rural Australians missing out on \\$6.5 billion annually in health care access while coffers fill up with rural contributions](#).

While telehealth services now offer women options to access services outside their local area, these services are geographically limited to those with access to technology, phone coverage, digital data and digital capacity.

Many women have no option but to travel considerable distances at personal expense even for initial medical consultations. These challenges may be so great that women completely disengage from the healthcare system, creating additional barriers when they try to claim DSP.

Many women have no option but to travel considerable distances at personal expense even for initial medical consultations. These challenges may be so great that women completely disengage from the healthcare system

A lot of families, when we see them, have actually had very little contact with medical services up until they start working with [family and domestic violence] services ... So often that evidence [doesn't exist yet] ... Sometimes we're starting from scratch with just getting a family GP.

— Regional New South Wales

Others report that, while they have access to GPs in their local community, there is a critical lack of continuity of care.

It's difficult for our clients to access health services in cities. It's even more difficult for clients in remote areas. Some clients in smaller towns report locum GPs rotating in every few months. Clients can't access continuity of care even if they are able to see a doctor. This then obviously impacts their ability to meet the criteria for DSP.

— Statewide Queensland

Doctors keep getting seconded down there. So, they're seconded for six months and then they leave. So, there's no continuity [which undermines] ability to get your medical documents for your Disability Support Pension.

— Statewide Victoria

They don't have an established health network that knows about their history, and that's really problematic.

— Statewide Victoria

While short-term or locum GPs may provide some medical evidence, the quality of service can fall short of that needed to address DSP eligibility requirements. Particularly, detailed assessments regarding prognosis, impairment and treatment are frequently missing when a GP has seen a patient only once or twice, leading to the rejection of a DSP claim.

Medical professionals in highly specialised fields may be entirely absent from regional areas

Many women with specific medical conditions require assessment and evidence from a specialist before their DSP claim can be assessed, regardless of the severity of the disability. This is problematic considering medical professionals in highly specialised fields may be entirely absent from regional areas.

[Regarding] medical practitioners - the people needed in order to get that evidence ... so they're putting a requirement on rural and regional and remote women that is impossible to attain if they need to get a neuropsych report. There are no neuropsychs in regional areas.

— Statewide New South Wales

We do not have a permanent-based public health psychologist here. It is at least a three-month wait to even have an appointment. We don't have specialist services [and] we don't have specialist treatments in [this town].

— Regional New South Wales

We often have clients telling us their GP refuses to refer them to a specialist because there are none available locally, they are prohibitively expensive for someone on JobSeeker, and the GP knows the patient and knows that there is no treatment the specialist can recommend that will benefit them. In these cases, Centrelink has refused to grant DSP without a specialist opinion on the prospects of further treatment and the client therefore will never get on DSP.

— Statewide New South Wales

In other cases, medical and healthcare practitioners have closed their books to new patients due to their inability to meet demand.

I think it's probably even harder to get into a psychologist or psychiatrist. They're very much in demand. I think we all call them often and try and find a spot, but they've all got their books closed, so there's not many options for that kind of medical support in town either, unfortunately.

— Regional New South Wales

There's those aspects around doctors with their books closed; trying to find places that are going to be able to provide bulk billing to patients. All those kind of factors really affect people in our local community, which is a barrier for them to access DSP and various other entitlements.

— Regional New South Wales

Without accessible local medical services, pathways to DSP are limited. This issue is of particular concern for women with debilitating or terminal illnesses designated 'manifest'. Although Services Australia has specific processes to expedite DSP claims where medical evidence indicates a condition is terminal, EJA members see clients whose initial claims are denied only to be granted upon submission of additional specific evidence. Of course, people need to understand DSP eligibility criteria in order to seek further evidence.

Lack of medical services is also a major issue for women with multiple conditions where none attracts 20 points on a specific Impairment Table, as they are required to see multiple specialists and different allied health professionals to get a condition diagnosed, reasonably treated and stabilised. There are also conditions where evidence from more than one practitioner is required. For example, some skeletal conditions require evidence from both an orthopaedic surgeon and a pain clinic.

If finding one specialist is hard, finding multiple is impossible.

— Statewide New South Wales

Limited access to medical and associated services in 4R Australia requires the design of social security eligibility requirements that are fit for purpose. The *Social Security Guide* includes provisions addressing the limited availability of medical treatment and reports in remote areas. Section 3.6.2.10 states that Services Australia must make decisions based on 'the best available medical evidence', but that some decisions may be made 'on the basis of available evidence':

In the case of people from remote areas who may have limited access to doctors, a community nurse can assist in collating their medical evidence, which should generally be based on clinical notes from a GP (the diagnosis must be made by a qualified medical practitioner). In these cases, it may be possible for the Job Capacity Assessor or [government-contracted doctor] to form an opinion regarding the person's medical qualification on the basis of available evidence. This will only apply if the medical condition has been diagnosed, reasonably treated and stabilised, and is likely to persist for more than 2 years to the extent that it is possible to assign an impairment rating.

The *Social Security Guide* also provides (at section 3.6.2.10) that:

There are a small number of vulnerable people with suspected mental health conditions who are likely to be qualified for DSP or eligible for a significant reduction in their participation requirements but are unable to be effectively assessed through normal DSP assessment procedures. This may be because they are disengaged from the health system, or do not acknowledge the impacts of their condition on their capacity to work or comply with requirements. This may include people who ... are living in remote communities with little or no access to health services.

While these provisions are useful, and are used by EJA Member Centres to support clients' DSP claims, they do not go far enough.

Firstly, medical services may be unavailable in remote areas, but also in regional and rural areas.¹⁸ Secondly, and of particular concern, these provisions were not raised by the majority of community workers interviewed during this research, suggesting they were not aware of these provisions. It is also unclear how well understood these provisions are by Services Australia staff working in 4R areas and whether they are routinely made available where appropriate to women attempting to claim DSP.

Medical services, including reports, inaccessible due to cost

When services are available, the associated cost is often prohibitive. Community workers reported it was not unusual for women to be unable to afford medical appointments, including GP appointments. Where a free or cost-effective service was available, it was usually in the closest major town or city, requiring the expense of travel, accommodation, and other costs.

Some people can't even afford to go to the GP to get these reports. It's happening right across the board, not just Centrelink, but it's hard to access appointments. I know we've got a place here that they can. If they need specialised treatment, they can go and get it paid for, as in the trip to Melbourne, which is six hours.

— Statewide Victoria

Often the payments are so low, people are living week to week and not prioritising other aspects of their life ... like allied health. They're just living in crisis mode week to week.

— Statewide New South Wales

Where a free or cost-effective service was available, it was usually in the closest major town or city, requiring the expense of travel, accommodation, and other costs

¹⁸ Ibid.

Some service providers also reported that medical practices were essentially profiteering from the lack of competition and lack of accessible health providers.

I've heard of GPs [who are] the only GP in town, so they refuse to bulk bill and jack their prices up because they can.

— Statewide New South Wales

EJA is hopeful that the recent policy change, which extends the maximum period allowed for a medical certificate from 13 weeks to up to two years, will go some way towards minimising the cost and inconvenience of managing poor access to medical services. However, it is not a fix. EJA supports the Federal Government's recent commitment to increase bulk billing, and will be seeking reassurance that bulk billing will become more accessible in 4R areas.¹⁹ Unfortunately, that change will not address a critical issue: the lack of a Medicare line item for the preparation of written evidence. Medical professionals can be unwilling to provide a report to support a DSP claim because report preparation, which is often time consuming, cannot be billed to Medicare.

I've heard of one specialist that you have: the traveling specialist. They turn up only once every six weeks or once every three months, and they refuse to provide anything in support of DSP. So the only specialist available will not provide anything that can be used for a DSP claim.

— Statewide New South Wales

Doctors must either try to compile and complete medical evidence within the time allocated for a medical consultation, or complete reports in their own time. Rushed reports are less likely to assist women to access DSP where they have not been drafted to address DSP qualification criteria and relevant Impairment Tables.

19 Department of Health, Disability and Ageing (2025). [Upcoming changes to bulk billing incentives in general practice](#).

Medical evidence not fit-for-purpose as practitioners don't understand DSP criteria

In the past, Centrelink provided a form for doctors to provide evidence, known as a Treating Doctor's Report. The Treating Doctor's Report simplified the medical report process because it included targeted questions that guided the practitioner to address DSP criteria.

Medical professionals can be unwilling to provide a report to support a DSP claim because report preparation, which is often time consuming, cannot be billed to Medicare

The Treating Doctor's Report is no longer available (although it remains available for medical reports generated outside Australia),²⁰ with doctors in Australia left to 'freestyle' the provision of medical evidence. Many lack a detailed understanding of the social security system, including DSP criteria, and are without the time and means to discover what Centrelink needs to accurately assess a DSP claim and then construct records of medical evidence to meet specific criteria. A patient may bring in forms they've obtained from Centrelink but these are of little explanatory assistance.

Doctors don't understand the requirements. They get it really mixed up between say, compensation matters, NDIS and DSP. They don't understand the difference and there's very, very different requirements between them.

— Statewide New South Wales

The questions on DSP claim forms aren't even sufficient to elicit appropriate comments from health professionals who support their patient's claims.

— Statewide Queensland

20 Services Australia (2024). [Treating Doctor's Report - outside Australia form \(AUS109\)](#).

Case study – Shelley

Shelley had been through a terrible incident resulting in significant injuries. She was no longer able to walk and her digestive system had been badly damaged, leaving her with chronic pain and a host of other symptoms which made it near impossible to travel or participate in work or social activities. As a result, she was also experiencing poor mental health, which further undermined her system to cope.

Shelly claimed DSP but her claim was rejected. She was awarded 10 points for her lower limb impairment, and 10 points for reduced digestive function, which got her 20 points on the Impairment Tables. DSP could not be granted because she had not completed (or commenced) a Program of Support (POS).

Shelley was homeless by the time she found an EJA Member Centre to ask for help. Shelly's advocate knew that Shelley would not be able to participate in, or benefit from, a POS, so sought a review from an Authorised Review Officer (ARO). Her advocate argued that Services Australia's analysis of the medical evidence had failed to recognise the severity of Shelly's conditions and their impact on her capacity to look for work.

Shelly was fortunate. Not only did the ARO consider the evidence at hand, they proactively reached out to her GP to check the GP's description of her conditions against the Impairment Table criteria.

The ARO awarded Shelley 20 points on one table, then an additional 20 points on another table, and 10 points on a third table. Shelly's claim for DSP was granted. Shelly's advocate was impressed at the ARO's 'non-standard' approach, noting the efficiency of direct contact to clarify evidence, preventing the need for prolonged deliberation or escalation to external review.

EJA Member Centres spend considerable time and effort asking medical and allied health practitioners to redraft reports so that, while they remain accurate, they refer to issues relevant to DSP assessment criteria. This includes instances of doctors being reluctant to comment on life expectancy, until learning that accurately communicating life expectancy would enable a client to access DSP as a 'manifest' grant for a terminal condition. The issue of ill-fitting medical reports is so chronic that Welfare Rights Centre NSW has begun to offer training to medical services on providing medical evidence for their patients' DSP claims.

Previously the Australian Medical Association (AMA) has raised the issue with Government. Their submission to the 2021 DSP Senate Inquiry argues that the 2015 removal of the Treating Doctors Report has streamlined administrative requirements and reduced workload, but that 'clearer and better funding mechanisms [are needed] to support GPs in compiling and/or summarising medical evidence to support a patient's claim' are needed.²¹ The AMA calls for Continuing Professional Development (CDP) accredited training to medical practitioners to better understand DSP eligibility criteria and associated medical evidence. Notably, the scale of the 'big ask' by Government – that busy private-sector GPs focused on therapeutic care understand DSP medical evidence requirements – is reflected in the AMA's statement that 'doctors prefer that the assessment for DSP is carried out by government employed/contracted practitioners who fully understand the eligibility requirements, the medical evidence required, and the relevant legislation'.²²

More effort is required from the Federal Government, across portfolios, to ensure healthcare providers and associated stakeholders are equipped to provide fitting medical evidence that effectively addresses DSP eligibility criteria. That includes training and, from EJA's perspective, a simplified Treating Doctors Report.

Difficulty accessing Job Capacity Assessments

When a person who does not have 'manifest' DSP eligibility applies for DSP, they are required to have a Job Capacity Assessment by an Assessor employed by Services Australia. The assessor – a health professional – will then assess how the person's condition affects their ability to work and get a job, liaising with treating doctors and other health professionals as required.²³

Job Capacity Assessments can be conducted via a face-to-face appointment, video conference, phone call or file assessment. Operational instructions to staff advise that a face-to-face interview may be most appropriate where the customer/nominee requests it, the customer has communication difficulties that preclude effective phone use, specialist assessment is required, visual confirmation is required, or customer verification of information is needed.

EJA Member Centres agree that communication difficulties can make face-to-face appointments essential but report that face-to-face appointments have become rare, including when recommended, undermining an accurate assessment.

21 Australian Medical Association, Submission No 133 to Senate Community Affairs References Committee, [Inquiry into the purpose, intent and adequacy of the Disability Support Pension](#) (2021).

22 Ibid.

23 Department of Social Services (2025). [Social Security Guide – 1.1.J.10 Job capacity assessment \(JCA\)](#).

Face-to-face JCAs are very rare. I can't recall the last client who had one.

— Regional New South Wales

It can be very difficult to describe your own health, especially to a stranger. With additional barriers such as language, cognitive issues, poor mental health, embarrassment and/or a natural tendency to 'look on the best side of things', a face-to-face appointment can be the only way that an assessor will get an accurate picture of the person's impairments.

— Statewide New South Wales

Services Australia's operational instructions also state that, before recommending face-to-face assessment, staff should consider a person's remote location, whether travel time is significant (e.g. more than 90 minutes each way), the impact of travel on the person, as well as the assessor's availability. This guidance is essential to ensure equitable access for women who lack accessible transport to travel, are without phone and internet reception, have limited digital literacy or cannot afford digital technology.

EJA Member Centres have worked with numerous clients where the results have been overwhelmingly positive after Job Capacity Assessors travelled with Remote Servicing Teams, facilitating access to DSP as described in [Social Security for Women Outside Our Cities: Service Delivery Barriers](#). The case studies of Judy (page 22) and Margaret (page 23) within that report highlight the efficiency of this approach when a person who lives in a remote setting has their claim requirements effectively managed by remote servicing staff.

Recommendation 24: That Services Australia routinely make requests to medical services on behalf of vulnerable Disability Support Pension claimants where the claimant is unable to secure evidence unassisted.

Recommendation 25: That the Department of Social Services and Services Australia review and amend the *Social Security Guide* to increase consideration of alternative medical evidence processes for people in regional, rural, remote and very remote areas.

Recommendation 26: That Centrelink reintroduce a Treating Doctor Report as part of the Disability Support Pension claim package, with introduction of a new Medicare item number to ensure it is billable under Medicare.

Recommendation 27: That Services Australia introduce a phone line for medical professionals to call if they have questions about the Disability Support Pension claim form or associated evidentiary requirements.

Recommendation 28: That Services Australia increase the frequency of Job Capacity Assessors travelling with Remote Servicing Teams to undertake assessments of people in regional, rural, remote and very remote areas, whose access to Job Capacity Assessment is limited by their geographic location.

Program of Support requirement a systemic barrier to DSP

The Program of Support (POS) requirement represents a significant obstacle to DSP for women in 4R areas with chronic illness or disability. Many women find the POS requirement frustrating based on a sense they are being made to 'jump through hoops', despite their limited capacity, to undertake activities that won't help them.

Community workers reported cases of clients, who were clearly unable to work due to their multiple medical conditions, being forced to endure 18 months of POS activities before they could qualify for DSP

Activity requirements are not always realistic or helpful.

— Statewide New South Wales

Challenges experienced in metropolitan areas are amplified in 4R areas where there are fewer support services and training activities, greater distances to travel to services, less or no public transport, and reduced or no digital connectivity for telehealth and remote options.

Community workers reported cases of clients, who were clearly unable to work due to their multiple medical conditions, being forced to endure 18 months of POS activities before they could qualify for DSP.

Program of Support has never made sense to me. It's aimed at people with multiple conditions, as if they are somehow more able to benefit from a program, but the reality is comorbidities mean those people are less able to improve their ability to work. For many of our clients that is so obvious from the very first interaction with them.

— Statewide Victoria

We deal with clients that have a POS requirement they cannot meet. Their options are limited. They may have to start a POS or try alternatives like requesting a review in the hope that they get assessed as having a higher impairment rating on a single Impairment Table. These lengthy processes can be extremely taxing for them.

— Statewide Western Australia

Where necessary to meet Program of Support requirements for DSP, we usually advise clients to try to go through the motions even though they are unlikely to be successful in getting a job based on their impairments.

— Statewide Queensland

We have clients who have been struggling on at work for longer than medically advised as they are scared to rely on government payments or feel they must support their families. They leave ONLY when medically critical that they do and lodge an application for JSP and DSP at the same time. They are refused DSP due to the POS however they have not undertaken one over the previous 18 months due to working beyond medical advice.

— Statewide New South Wales

Case study: Elise

Elise had a workplace accident and had mental health issues and a spinal condition that caused her to stop working. She had undergone treatment through her employer's insurance and had been on Workers Compensation payments for a number of years. When Elise applied for JobSeeker Payment, the Centrelink officer who interviewed her told her to immediately lodge an application for a medical exemption and to talk to her GP about it, although at that point, Elise chose not to.

An appointment with an Employment Services Assessor was arranged and Elise was placed with a Disability Employment Service Provider (DES). At her appointment, a work plan was placed in front of her. She was told to sign it, and that if she did not sign it, she would not get Jobseeker Payment and that she had no choice. When she told her DES Provider she would not be able to manage the requirements in her work plan, that they were too difficult and her health prevented her from complying, she was told again that she needed to sign it and that it could not be amended.

Elise signed the work plan and immediately made an appointment with her GP to request that they provide her with a medical exemption from her mutual obligations.

Services Australia found that Elise had a moderate impact on her mental health and spine and a mild impact on her lower limbs. She was not eligible for 20 points on any table and was not able to comply with her work plan for long enough to establish a relationship with her employment service provider in order to ask them to exit her from the POS. She resigned herself to remaining on JobSeeker until her health deteriorated enough to get 20 points or she qualified for Age Pension.

A major issue for community workers assisting DSP claimants is that their clients become ‘trapped’ by the POS requirement.

Applicants are unable to comply with their POS so they seek a medical exemption, not understanding the impact that medical exemptions can have on their eligibility for the DSP long-term. GPs don't understand the impact either but recognise that it is impossible and unfair that their patients are being forced to seek work when their health is so poor, so they readily complete the forms for an exemption and advise their patients to apply for the DSP. DESI providers refuse to exit their clients or are unable to as the client has never engaged with them and community workers are stuck unable to help their clients to navigate the system.

– Statewide New South Wales

I've spoken to clients who I believe are genuinely unable to actively engage with POS due to their disabilities, but as part of advising them of the requirements for DSP, I have to persuade them to avoid submitting medical certificates and go through the motions even after hearing all their struggles. These clients are basically left to rely on the kindness and generosity of the particular person they engage with at their employment service who have the power to decide what activities need to be met for them to fulfil mutual obligation requirements for Jobseeker Payment or to stop their payments when they fail.

– Statewide Queensland

The POS requirement disproportionately excludes women who are most vulnerable and without the means to secure better medical evidence or advocate for an exit from the program.

Illness and escalation of symptoms delay completion of POS

The 18-month POS period is extended if a person requires time off the program because they are physically unable to participate, demonstrated by a medical certificate. This frequently occurs when a person experiences illness or a flare-up of an underlying condition.

Time spent on a medical exemption does not count toward the 18-month POS requirement, forcing women to choose between participating in mutual obligation activities while unwell, or delaying access to DSP.

EJA Member Centres regularly represent clients who have been stuck on JobSeeker for years, with frequent or ongoing medical exemptions, who have not been exited from their POS despite it being apparent that they cannot participate and will not benefit from engagement.

Clients will do mutual obligations for a month or two, then be granted a medical exemption for three months. They may get more than one exemption in a row so that ultimately, after 18 months they have completed only a few months. They are never healthy enough to complete a full 18 months within three years.

– Statewide New South Wales

Time spent on a medical exemption does not count toward the 18-month POS requirement, forcing women to choose between participating in mutual obligation activities while unwell, or delaying access to DSP

Issues with engagement in the POS are only going to get worse now that Centrelink will be granting exemptions for 12 [to] 24 months at a time. These exemptions are critical and necessary but have significant consequences for women trying to get onto DSP.

– Statewide New South Wales

Underestimation of the impact of multiple conditions

The POS requirement disproportionately affects women with multiple conditions or disabilities where Services Australia considers none is a 'severe' impairment, including where multiple conditions are awarded impairment ratings that far exceed 20 points in total. This system ignores the reality that the impact of multiple conditions and comorbidities is often greater functional limitation than a single severe condition.

Chronically ill women on JobSeeker Payment regularly receive ongoing medical exemptions from participation requirements - a flawed logic loop. Their conditions are severe enough to warrant continuous exemptions from work activities, yet these same exemptions prevent them from completing or being exited from the POS. This keeps them indefinitely on JobSeeker Payment. The multi-staged assessment process is not fit for purpose.

Oftentimes, their most debilitating condition will be the only condition that is not reasonably treated so the one condition that would give them 20 points is not taken into account by Centrelink and all other conditions require them to complete a POS.

– Statewide New South Wales

Case study – Ava

Ava had struggled with multiple conditions for some time, including loss of hearing, difficulty walking and chronic pain. She also had a cognitive impairment which often made it difficult for her to understand things, including how to navigate the DSP system.

Ava's health deteriorated, and she decided to claim DSP. She had been treated by her GP for more than a decade and had a good relationship with them. They had provided a large number of tailored reports and had provided Ava with copies of her medical records without charge. They recommended she apply for DSP as they recognised that it was impossible for her to work and that her health was not going to improve.

Services Australia recognised that her conditions seriously impaired her ability to function, and granted her a total of 45 points from multiple Impairment Tables. However, because she did not have 20 points from a single table, she was told she would have to undertake a POS before she could qualify for DSP.

Ava was so unwell that her doctor provided medical certificates covering successive periods because (effectively) she could not engage in the tasks required to satisfy her mutual obligations. Her conditions were not improving. She struggled to leave her house most days.

When Ava contacted an EJA Member Centre, she was distressed about not being able to access DSP, but particularly about the idea that Services Australia might reject her doctor's next medical certificate. If that happened, she would lose her JobSeeker because she knew she could not undertake a POS.

Ava's advocate agreed to assist her, recommending two concurrent courses of action: contacting her employment service provider to request an exit from the POS, and appealing her DSP decision regarding her impairment rating.

Ava's advocate contacted her employment service provider who agreed it was clear Ava could not undertake a POS. However, they could not exit Ava as, due to her medical certificates, she had engaged in her POS for only one week and the provider had not been able to 'tailor' a set of mutual obligations. They were unable to say if they would have been able to improve her chances of finding and maintaining work. The employment service provider also stated they could not exit her as the only option available on their system for exiting was that 'Jobseeker meeting requirements requests exit', but when that option was chosen it gave an error message, and the Department of Employment and Workplace Relations guidelines stated they could only exit a person after 18-24 months of participation.

The advocate was unable to get Ava exited from the POS. The POS requirement ended only when Ava's appeal was successful and she was granted 20 points on a single table, making the issue of the POS redundant.

There is no justification for the gatekeeping of access to DSP for people with high impairment ratings resulting from multiple impairments that result in minimal or no capacity to work.

No prior warning regarding POS

Many DSP claimants first learn about the POS requirement only after they pass other eligibility hurdles. That is, Services Australia agrees their condition has been 'diagnosed, reasonably treated and stabilised', and they are assessed as having at least 20 points on the Impairment Tables, but their DSP claim is rejected because they failed to score 20 points on any single table. Commonly at that point, claimants have waited months for Services Australia to assess their claim, only to learn they must potentially wait at least another 18 months before qualifying for DSP. Where someone has claimed DSP, claim processing has dragged on, and an initial rejection is the subject of appeal, they may have spent years trying to get DSP before they learn of the POS. That experience can be shattering.

Many clients report their confusion and frustration at being told about the Program of Support requirement for the very first time at the stage of ARO or even Tribunal review. It can be a significant set-back and deterrent for vulnerable people exhausted and burnt out from the DSP application process.

— Statewide Queensland

Applicants can have spent years and a significant amount of money through appeals and multiple applications, seeking additional specialist evidence at significant cost in order to have their conditions recognised as diagnosed, reasonably treated and stabilised. The process can be stressful and can be a contributing factor in them seeking medical exemptions. It is often only later on in the appeals process that they hear the words Program of Support for the first time.

— Statewide New South Wales

It can be really off-putting to have hurdle after hurdle put in front of you. It's not unheard of for clients to give up at this point, even when it's obvious they should be on the pension.

— Statewide Victoria

Case study – Andrea

Andrea has a back condition and also anxiety. She can't work and so applied for DSP. Andrea was notified that her DSP claim had been rejected via a (now defunct template) letter that simply stated she didn't meet the criteria for DSP. The letter did not provide any specific reasons or details about her individual circumstances or conditions.

Andrea sought an internal review by an Authorised Review Officer (ARO). The ARO affirmed the original decision, however, through the ARO's decision she learnt that Services Australia believed her conditions were not 'diagnosed, reasonably treated and stabilised' due to insufficient information included in her medical evidence about her treatment and prognosis.

Andrea obtained additional medical evidence, then lodged a request for an external review of the ARO's decision at the first tier of the Administrative Appeals Tribunal (AAT). The ARO's decision was affirmed, and Andrea's claim was rejected. It was only through the AAT's written decision that Andrea learned her medical conditions had been awarded less than 20 points on the Impairment Tables.

Andrea sought further detailed medical evidence. She lodged a request for review at the second tier of the AAT. Andrea was awarded 20 points across two tables. It was at this point she learned about the Program of Support requirement.

Failure to 'exit' women from the POS

The *Social Security (Active Participation for Disability Support Pension) Determination 2014* provides ways in which a person can meet the POS requirement without completing 18 months of participation, two of which are particularly important. First, where a person's participation in the POS is terminated early because their impairment makes them unable to improve their work capacity, they will be taken to have met the requirement.²⁴ In practice this decision rests with the provider, and is commonly referred to as being 'exited' from the POS. In EJA's experience, this option is not commonly used and some EJA Member Centres have been told by providers that they have policies that expressly prevent them exiting participants.

Second, where the person's impairment makes them unable to improve their work capacity but the POS has not been terminated, the person may still be taken to have met the POS requirement, provided they are actively participating in the POS at the time of their DSP claim.²⁵ In practice, this is demonstrated through medical evidence.

That leaves women with a single option for maintaining income support – repeatedly seeking temporary exemptions from the POS due to illness or symptom flare-ups

²⁴ *Social Security (Active Participation for Disability Support Pension) Determination 2014* (Cth) s 7(4).

²⁵ *Social Security (Active Participation for Disability Support Pension) Determination 2014* (Cth) s 7(5).

Employment service providers are not always fully informed about, or ignore, their authority to exit a person from a POS on the grounds that participation will not improve their work capacity. This can delay access to DSP for women with significant impairments, including complex comorbidities, by months or even years. That leaves women with a single option for maintaining income support: repeatedly seeking temporary exemptions from the POS due to illness or symptom flare-ups.

[Employment Services] providers have told us that they do not exit people from the POS, Centrelink do. They tell us that they can do nothing to help with POS, and it is up to Centrelink only. Even using now-defunct Human Services forms designed to enable JNPs to recommend an exit, they tell us they can do nothing.

– Statewide New South Wales

Maybe one in fifty know they can exit someone, at least based on the clients I speak to. Most have never heard of it. It's certainly not a process that feels built into their workflow.

– Statewide Victoria

Confounding requirement for those previously receiving DSP

Some women have received DSP for many years before having their payment cancelled, for example, as the result of a medical review, partner income assessment, or absence overseas.

In such cases, the POS requirement can create a paradoxical situation. If a woman reclaims DSP and is found to have an impairment rating requiring POS participation, she will have to wait at least another 18 months before she is eligible for DSP because she will not have been undertaking work readiness activities in the previous 18 months ... because she has been on DSP. EJA Member Centres report that clients who have found themselves in this situation have rarely benefited from participation in a POS.

In these circumstances, women may be advised by Centrelink to undertake a convoluted process to address their situation – claim JobSeeker Payment, commence a POS, obtain additional medical evidence showing the POS offers no benefit, apply to exit the program, and once exited, reapply for DSP – all while appealing the decision regarding their impairment rating that landed them on a POS in the first place. This process is unnecessarily complex and does not benefit those affected, their healthcare providers, employment services providers, or Services Australia.

People give up trying to access the DSP after hearing about the POS requirement and that they may need to do their mutual obligations for 18 months. This means they remain on JSP knowing they will never get on the DSP but also knowing they cannot comply with mutual obligations. They risk suspension and cancellation when medical exemptions are no longer granted.

– Statewide New South Wales

Women who lose DSP eligibility due to incarceration also get caught in this loop as their DSP is cancelled at after two years, including when they have been on DSP for many years and there is no indication that their condition may improve. Even where they have completed TAFE, university or Work Ready courses during the previous 18 months, these cannot be considered a component of a POS. Upon release, they must claim DSP and start the process from scratch.

Opportunity for change

The legal basis for the POS system is a determination, the *Social Security (Active Participation for Disability Support Pension) Determination 2014*, made under subsections 94(3C) and (3E) of the *Social Security Act*. Importantly, this determination will ‘sunset’ in April 2026, requiring the introduction of a new instrument. This presents an important opportunity for reform of the problematic POS system.

EJA strongly supports opportunities for all people to access support to increase their employment opportunities, including people with a chronic illness or disability, as described in Chapter 4: ‘Women who are underemployed or unemployed’. Unfortunately, the POS is not fit-for-purpose, routinely trapping people with debilitating symptoms of chronic illness or disability in an 18-month process that does not help their employment prospects. Further, this is a ‘program’ requiring significant expenditure of public funds to the privatised employment service provider system.

EJA calls on the government to remove the POS requirement, instead channelling funding into constructive efforts to assist people wanting to increase their employability to uptake work.

Recommendation 29: That the Federal Government introduce legislation to amend Disability Support Pension qualification criteria outlined in section 94 of the *Social Security Act*, removing the Program of Support requirement; and in the interim, that they include clear criteria for exempting a person from the Program of Support requirement.



Chapter 3

Women who are Carers¹

Women as carers and organisers ... that's just valued as a lesser role, and the Centrelink payments aren't reflective of the actual work that it takes to be a carer.

- Regional Queensland

Key findings

- Women shoulder the majority of caring responsibilities, especially in regional, rural, remote and very remote (4R) Australia, but can face systemic barriers to social security support.
- Recent reforms to eligibility criteria for carer-related payments increased flexibility related to working hours but restrictions continue to limit employment and social engagement, which in turn creates poverty traps for women carers.
- Rigid qualification criteria, including 'constant care' definitions and care location requirements, prevent some carers from accessing social security support despite their caring responsibilities limiting or preventing paid employment.
- Current care assessment tools undervalue supervisory care – including care for a person with a psychiatric condition, cognitive impairment and/or behavioural disorder – excluding some carers providing 24-hour supervisory care from social security support.
- Arbitrary exclusion of psychologists from adult care assessments undermines assessment quality and can disadvantage women caring for people with psychological, behavioural or cognitive impairments.
- Healthcare and social security service delivery failures disproportionately disadvantage women carers in 4R areas.

How are women who care for people with disability or chronic health conditions supported by the social security system?

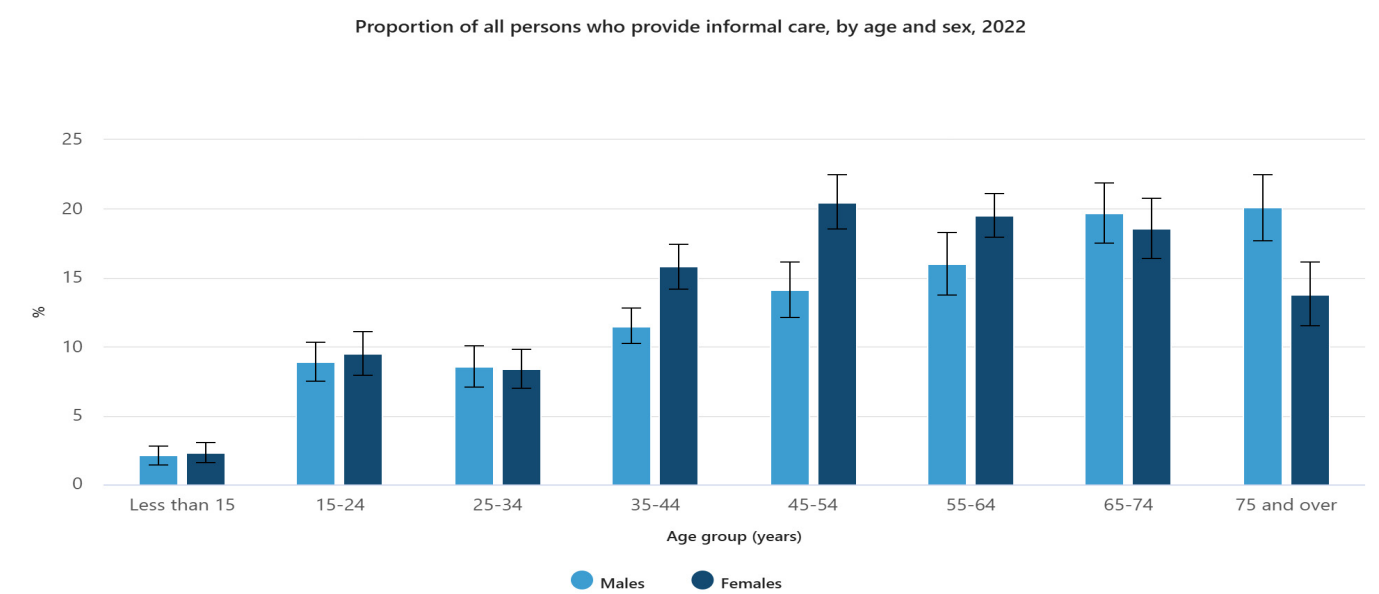
An estimated 11 per cent of the Australian population provide care for a person who is unwell, frail or has a disability.¹ Caring remains highly gendered, noting two-thirds (68 per cent) of primary carers are women.² Women who are primary carers are more likely to live outside major cities.³ Some carers are of school age, many are post-retirement age (and often caring for an elderly spouse), however, the majority of carers are women of working age.

1 Australian Bureau of Statistics (2022). [Disability, Ageing and Carers, Australia: Summary of Findings](#).

2 Ibid.

3 Australian Institute of Health and Welfare (2024). [Rural and remote health](#).

Chart 1: Proportion of primary carers by age and gender (2022)⁴



First Nations people are more likely to engage in caregiving than non-Indigenous Australians and take on caregiving at a younger age.⁵ While likely under-represented in national data collections,⁶ an estimated 15 per cent of First Nations people aged 15 years or older are providing unpaid care. First Nations carers are also more likely than non-Indigenous Australians to be providing multi-generational care, with the 2022 National Carer Survey finding 43 per cent of First Nations respondents caring for more than one person, with 17 per cent caring for three or more people.⁷ In 2022, almost 20 per cent of carers aged 15 to 64 years of age relied on social security as their main source of income.⁸ This reflects the intensive nature of primary caring roles, which often limit work hours or result in complete withdrawal from the paid workforce. Of the 322,415 people receiving Carer Payment as at 28 March 2025, approximately 10 per cent were working part-time and earning more than \$250 per fortnight.⁹

4 Australian Bureau of Statistics (2022). [Disability, Ageing and Carers, Australia: Summary of Findings](#).
5 Australian Institute of Health and Welfare (2024). [Tier 1 – Health and status outcomes 1.14 Disability](#).
6 Federal Government (2024). [National Carer Strategy 2024–2034](#).
7 Carers NSW (2023). [2022 National Carer Survey: Full report](#).
8 Australian Bureau of Statistics (2022). [Disability, Ageing and Carers, Australia: Summary of Findings](#).
9 Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#). In this data, and other data provided by the Department of Social Services in this report, people who identify as non-binary are grouped with women. For more information, refer to the data classification process described in the Introduction.

Payments for carers

This chapter focuses on Carer Payment and Carer Allowance, using the term ‘carer payments’ when referring to both.

Demand for caring payments has increased substantially over the past two decades. Carer Payment recipients grew from 84,100 in 2005¹⁰ to 322,415 in 2025¹¹. The number of people receiving Carer Allowance has also increased during that period, with the number of recipients increasing from 297,600 in 2005¹² to 674,860 in 2025.¹³

Carer Payment

Carer Payment is an income support payment for people who provide ‘constant care’ for one or more persons with a disability or severe medical condition. Eligibility requires that care is needed for a minimum of six months, unless care is provided for a person with a terminal illness. The carer is not required to live with the care receiver but must be providing constant care in the care receiver’s home.

The *Social Security Guide* defines ‘constant care’ as care provided on a daily basis for a ‘significant period’ during each day (section 1.1.C.310). Care may be active, supervisory or monitoring. This is interpreted to mean a level of personal care that extends beyond tasks such as housework or other domestic duties, which are considered tasks common to the management of a household.

Carer Payment is designed to provide income support to carers who are unable to undertake substantial employment because of their caring responsibilities, so a carer is expected to provide at least the equivalent of a normal working day in personal care. Eligibility can extend to circumstances where the carer is away from the care receiver for a limited portion of the day, but care is required during the remainder of a 24-hour period. Carers are permitted respite of up to 63 days per calendar year, with allowed respite extended where there is a ‘special reason’. In both regular and extended circumstances, the carer must inform Centrelink before taking a break.

Although not called a pension, Carer Payment is paid at the pension rate – the same rate as Age Pension and Disability Support Pension (DSP), which is substantially higher than the JobSeeker Payment rate. The maximum rate of Carer Payment is \$1051.30 per fortnight for a single person, and \$792.50 per fortnight for a partnered person. These figures increase to \$1149.00 (single) and \$866.10 (partnered) once the Pension Supplement and Energy Supplement are added.

10 Australian Institute of Health and Welfare (2005). [Australia's welfare 2005](#).

11 Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

12 Australian Institute of Health and Welfare (2005). [Australia's welfare 2005](#).

13 Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

Unlike other pensions, Carer Payment effectively has two income tests and two assets tests, as both the carer and person being cared for are means tested. The carer is subject to the same income and assets testing as for Age Pension and DSP. The care receiver is subject to specific means testing under the 'care receiver income and assets tests' (CRIA), although there are exemptions from care receiver means testing, including where the care receiver is severely incapacitated (*Social Security Guide*, section 3.6.4.120).

As at March 2025, there were 322,415 Carer Payment recipients.¹⁴ Around 47 per cent of recipients lived in regional, rural, remote and very remote (4R) areas: approximately forty three per cent regional/rural and four per cent remote/very remote.¹⁵ Women comprised 71 per cent of all recipients (228,805),¹⁶ again reflecting gendered caring responsibilities.

Carer Allowance

Carer Allowance is considered a supplementary payment for people who provide 'care and support on a daily basis' to a person who has a disability or medical condition or is frail aged. It is not an income support payment but rather a payment that can supplement other income sources including an income support payment (e.g. Carer Payment, JobSeeker Payment or Age Pension) or income from employment. It can also be paid to a person with no income.

Eligibility criteria include that care be required for at least 12 months, unless the person being cared for has a terminal illness. People receiving Carer Payment for a child automatically qualify for Carer Allowance, reflecting the intensive nature of caring for children with a disability.

Carer Allowance is paid at \$159.30 per fortnight for each eligible person receiving care, allowing carers to receive multiple payments if they care for more than one person. The payment structure includes generous eligibility thresholds, with no assets test and a simple income test that allows payments until the combined annual taxable income of the carer and their partner reaches \$250,000.

As of March 2025, there were 674,860 Carer Allowance recipients.¹⁷ Around 48 per cent of recipients lived in 4R areas: approximately five per cent regional/rural and three per cent remote/very remote.¹⁸ Women comprised 75 per cent (504,380) of all Carer Allowance recipients,¹⁹ reflecting the gendered nature of caring responsibilities across Australian households.

14 Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

15 Data derived by applying Modified Monash Model to LGA disaggregated data in Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

16 Ibid.

17 Ibid.

18 Data derived by applying Modified Monash Model to LGA disaggregated data in Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

19 Ibid.

Table 1. Key differences between Carer Payment and Carer Allowance (March 2025)

	Carer Payment	Carer Allowance
Number of recipients	322,415	674,860
Type of payment	Income support payment	'Supplementary payment', can be paid additional to income support payment, income from work or no other income
Amount/type of care	'Constant care', meaning care for a 'significant period' each day	Daily care and attention
Minimum care period	Six months unless for a terminal illness	Twelve months unless for a terminal illness
Location of care	Care provided in care receiver's home	Care provided in care receiver's home <u>or</u> carer's home
Income and assets tests	Carer and care receiver subject to income and assets test	Carer subject to generous income test, with no assets test
Who can provide care	Care provided by one person <u>or</u> more than one person	Care provided by: <ul style="list-style-type: none"> ▫ Parent or guardian (for child) ▫ Family member or approved person (for adult)
Care for multiple people	Payable if caring for one person with high care needs or more than one person with lower care needs	Payable for each person receiving care to a maximum of two adults and any number of children

Other social security payments and support

- **Carer Allowance Health Care Card**, a card that provides access to subsidised healthcare (including medications) where a child requires substantially more care and attention than children of the same age without a disability, but the carer does not achieve a qualifying rating under the Disability Care Load Assessment (see below). This generally applies where the child has additional care needs of at least 14 hours per week, and the Carer Allowance income test requirements are met. Women comprise 91 per cent (6900) of the 7750 people who have an active Child Health Care Card (Carer Allowance).²⁰
- **Carer Supplement**, an annual supplementary payment of \$600 automatically provided to people receiving Carer Payment and/or Carer Allowance. No separate claim is required.
- **Child Disability Assistance Payment**, an annual supplementary payment of \$1000 automatically provided to people receiving Carer Allowance for children under 16 with disability or medical condition. No separate claim is required.
- **Pensioner Education Supplement**, a supplementary fortnightly payment to eligible income support recipients to help with the ongoing costs associated with study. It is paid at \$62.40 per fortnight if a study load of 50 per cent full-time or more, and \$31.20 per fortnight if a study load of less than 50 per cent full-time.

Assessment of care needs

Eligibility for Carer Payment and Carer Allowance depends on the functional impact of the care receiver's health condition or disability on their ability to perform daily tasks. The assessment process uses different tools depending on the care receiver's age, with the design of these tools intended to provide an age-appropriate evaluation of care needs:

- **Adult Disability Assessment Tool (ADAT)**: People aged 16 years and older.
- **Disability Care Load Assessment (DCLA)**: Children aged younger than 16 years.

Both assessment tools follow a dual-questionnaire approach, with the carer and a treating health professional each required to complete one section. They are designed to assess the level of assistance required across basic daily activities including mobility, communication, hygiene, eating, and cognitive or behavioural tasks. For children, the DCLA includes comparative questions that assess the child's capacity against typical developmental expectations for their age, with final scores adjusted accordingly.

²⁰ Ibid.

The assessment process generates numerical scores that correspond to the level of care required. Eligibility requires both a minimum qualifying score from the treating health professional and a minimum total score which is derived by combining the carer and treating health professional scores. While the questionnaires themselves do not display the scoring methodology, the frameworks are detailed in the *Adult Disability Assessment Determination 2018* and the *Disability Care Load Assessment (Child) Determination 2020*.

Special provisions apply for terminal illness, though the timeframes differ by age. For people aged 16 or older, a medical practitioner must certify life expectancy of less than three months, while for children the period extends to 24 months. In such circumstances, medical evidence is required but ADAT/DCLA assessment does not need to be undertaken.

What is working well?

Improved flexibility for carers

The 2023-24 Federal Budget included a number of changes to increase flexibility of Carer Payment work and study provisions given restrictive participation requirements can trap carers in cycles of economic disadvantage. The changes include:

- adjustments to the 25-hour per work week limit, to allow carers to spread their working hours up to a total of 100 hours over a four-week period.
- removal of study, training, volunteering and travel time from participation and time limits.
- suspension of Carer Payment for up to six months when a carer exceeds the participation hours or 'temporary cessation of care' limits, replacing the former system of payment cancellation which required that the person lodge a new claim. This provision also allows people to keep their pension concession card during this six-month period.²¹

The removal of travel time limits is particularly important for women in non-metropolitan areas who may need to undertake considerable travel to undertake study or employment.

These changes align with the Government's efforts to remove barriers to employment, noting the *Carer Recognition Act 2010* states: "Carers should be supported to achieve greater economic wellbeing and sustainability and, where appropriate, should have opportunities to participate in employment and education" (Schedule 1). The translation of legislative intent into practical policy represents the culmination of sustained advocacy by community organisations such as Carers Australia, and aligns with evidence-based recommendations from the 2020 Productivity Commission inquiry into mental health²² and the 2024 Economic Inclusion Advisory Committee.²³

21 [Social Services and Other Legislation Amendment \(More Support in the Safety Net\) Bill 2024 \(Cth\)](#)

22 Productivity Commission (2020). [Mental Health, Report No 95](#).

23 Economic Inclusion Advisory Committee (2024). [2024 Report to Government](#).

Improved child-to-adult transition support

Carer Payment eligibility criteria differ for those providing care for children under 16 years old (child) and those caring for people aged 16 and over (adult), reflecting the differences between actions children and adults might be expected to undertake unassisted if not for their disability or chronic health condition(s). Consequently, carers must transition from Carer Payment (Child) and Carer Allowance (under 16 years) to adult equivalent payments around the time the care receiver child turns 16. If the child has a terminal illness, this process will occur when the child turns 18 years old.

The process requires a new claim, including acquisition and submission of new medical evidence to support a new care needs assessment, additional financial information for a new income and assets assessment, and other supporting evidence. This process has recently been streamlined and framed as a 'transfer' using specific forms: the 'Child to adult transfer for Carer Payment and/or Carer Allowance form', and associated form for medical practitioners.

If the carer submits the completed child-to-adult transition form on or before the child turns 16 years old, they will continue to receive Carer Payment and Carer Allowance until the form is processed. The payment guarantee does not apply to people receiving a Carer Allowance Health Care Card only.

While generally more straightforward than for DSP, the burden of assembling and completing documentation remains challenging for many women carers in 4R Australia (see below).

What needs to change?

Lack of awareness of entitlements

Some women in 4R areas remain unaware of carer payment entitlements, missing critical financial support during periods of caring responsibility. This is an issue that is likely more prevalent among specific cohorts, with community workers noting the lack of awareness of social security entitlements among people who have not previously accessed income support.

I think there's a lot of people that would be in that gap where they've worked all their lives and suddenly, they get into a situation, and they don't know that they could be eligible for these payments ... It's that lack of awareness. Unless you go searching, you don't know. And I'm wondering, if your medical practitioner knows that you are caring for your wife, are they going to actually [tell you about social security payments]?

— Regional Tasmania

Services Australia and Centrelink is literally ... it's a mystery. It's a mystery if you've never had to engage with it and it is behind closed doors and it is so inaccessible. And in those rural areas ...

— Regional Queensland

Lack of awareness of entitlements also becomes an issue at points of transition, including when care needs change and/or people take leave from employment to care for someone.

Her husband was diagnosed with cancer a couple of years ago and while he was sick, they were relying just on her income. Then when he got very sick, and she had to finish work to look after him at home - because he wanted to stay at home - she could get [Carer] Allowance but couldn't get [Carer Payment] because she had taken leave without pay from work and legally, she was still employed. She couldn't access the 'no work' benefits through her super because she wasn't the one who was sick ... She couldn't access anything, so there was that period of time there where it really was a struggle getting only Carer Allowance.

— Regional Queensland

Taking leave without pay to care for a terminally ill partner does not preclude payment of Carer Payment as eligibility requirements do not require that a carer is 'unemployed'. In the above case, the woman had successfully claimed Carer Allowance and Services Australia had medical evidence confirming her husband needed care. Services Australia may have made an error assessing eligibility, but the issue may have arisen because the woman did not update Services Australia when her husband's condition deteriorated. Regardless, something went wrong which left them struggling to survive on only Carer Allowance (currently \$136.50/fortnight) while her husband was dying.

Recommendation 30: That Services Australia improve partnerships with local healthcare providers, community organisations, and local government to disseminate information about payments for carers through trusted local networks in regional, rural, remote and very remote areas.

Navigating the onerous claim process

Many community workers described their experience with Carer Payment and Carer Allowance claims as far more straightforward than claims for DSP, also commenting that Centrelink staff working in this area can be proactive and helpful. Despite that, the process remains an obstacle for some, particularly women with disability and/or chronic health conditions, women who are not well-connected into medical and support services, women who are struggling to manage multiple onerous responsibilities, and women who have previously had difficult engagements with Centrelink and are loathe to re-engage.

Their child is on the spectrum, so that's an extra burden for the mother because [her husband's] not available to help her navigate or to know where to go for help.

— Regional Queensland

I've got a client at the moment who really should be thinking about getting Carer Allowance for her kid that's had this diagnosis, but she's had a year of hell from Centrelink and it's like she just thinks that she'll be rejected basically, and she [can't manage putting] in an application.

— Statewide Victoria

Her child receives NDIS and she's been told she's eligible for Carer Payment, so she went in and started it but she never finished it because the requirements [are too onerous]... She was just like, "The amount of time it's going to take me to do this and I don't even know whether we're actually going to get anything." She'd had glitches in the system before ... where things weren't matching up all the time. That was stressful, so after we said, "Oh, you might be able to get a Carer's Payment," she started going through that process but then said, "I can't do it. I'm not silly by any means, but I do not have the mental capacity to be able to go through that journey."

— Regional Queensland

This issue may be particularly pronounced for First Nations women who distrust mainstream services due to experiences of racism and cultural incompetence, preferring to rely on family and community networks for support rather than engaging with Services Australia.²⁴

Services Australia provides a number of methods to claim carer payments, including access through the disability, sickness and carers phone line, and through service centres, noting servicing has improved as people can now book a 30-minute face-to-face appointment. Unlike claim forms and other forms relating to most payments, the Carer Payment claim form is not available for download as a hard copy, requiring claimants to apply exclusively through Services Australia online services or contact Services Australia to obtain a hard copy form, which then needs to be collected or posted and printed. The inability to access hard copy forms prevents people from completing applications by hand, and also prevents community workers from providing practical support during home visits. This can present an almost insurmountable barrier for women in 4R areas who have limited phone reception and/or live considerable distance from a service centre. (For more see [Social Security for Women Outside Our Cities: Service Delivery Barriers](#), particularly the case study of 'Claire', p37).

24 Klein E, Hunt J, Staines Z, Dinku Y, Brown C, Glynn-Braun K, Yap M (2023). [Caring about Care](#), Centre for Indigenous Policy Research, Australian National University.

Recommendation 31: That Services Australia make Carer Payment forms available on their website.

Healthcare system limitations undermine social security access

Access to healthcare services is essential for carers trying to establish their social security entitlements, as medical reports are required to demonstrate eligibility. Consequently, social security access is limited by the lack of medical services in 4R areas, costs of travel to services, and cost of the services themselves. This is particularly relevant where medical services are not locally available or well subsidised.

Many of the young people that aren't eligible for NDIS but are on JobSeeker probably belong on NDIS but they don't yet have a diagnosis for a disability because we don't have services that will diagnose them ... If that young person can't get an autism diagnosis or a disability diagnosis, [payment of Carer Payment] will never occur despite the fact that carer can't work.

— Regional Queensland

There's a Carer Allowance ... but then you have to get them assessed. She used to go to [the clinic] but they don't have doctors anymore.

— Regional Queensland

Diagnosis of a medical condition is not necessarily required to access carer payments, as the ADAT and DCLA are concerned with caring needs rather than the specific disability or medical condition limiting the person's capacity to care for themselves. The forms do, however, ask claimants to name the care receiver's diagnosis, and it can be challenging to find healthcare professionals prepared to complete assessment forms without it. The cost of diagnostic assessments varies significantly but can represent a substantial portion of household income for families dealing with no or reduced earning capacity due to caring responsibilities. Where diagnosis cost hundreds or even thousands of dollars, diagnosis can represent an impossible financial barrier for families who need the diagnosis to access treatment and support services (including via the NDIS), and to access income support that would help them afford such assessments.

Where diagnosis cost hundreds or even thousands of dollars, diagnosis can represent an impossible financial barrier for families who need the diagnosis to access treatment and support services

Healthcare provision can also present a barrier to carer payments where the treating health professional lacks clarity regarding their role completing an ADAT or DCLA form. The *Social Security Guide* states that the treating health professional should complete the form based on their own clinical assessment and/or information provided by others involved in the person's care (section 3.6.9.70). However, there is no effective mechanism for a treating health professional to access Services Australia directly for expert advice regarding their role or other issues related to completing these forms. Treating health professionals do not always understand their role, leading to confusion regarding the degree to which their description of their patient's care needs should reflect their patient's description of those needs or the practitioner's assessment of their needs, which may be contradictory, including where they suspect their patient requires far more care than they describe. This issue was recently identified in a 2024 Administrative Review Tribunal (ART) decision:²⁵

Mrs A spoke to her doctor, feeling capable but lacking insight into the way her conditions limit her independence. On the treating doctor's medical report, her doctor:

- noted that Mrs A was continent and did not require assistance for toileting, however, Mrs A sometimes lost bladder and bowel function requiring assistance toileting, including during the night or occasionally (as a result of her anxiety) when she would lose control of her bowels or wet the bed. She would also forget to go to the toilet, requiring reminders and encouragement to use the toilet regularly.
- noted that Mrs A was not cognitively impaired, although he identified that Mrs A had an intellectual disability. Her support worker clarified that Mrs A had significant cognitive difficulties due to her mental health conditions, including difficulty remembering or comprehending things.
- did not comment on limitations to Mrs A's mobility which have resulted from psychiatric or cognitive impairment, noting that while she could physically use stairs, she becomes frightened of using stairs and required verbal encouragement and assistance to walk up and down stairs.
- did not comment on Ms A's capacity to physically groom and dress herself, despite Mrs A requiring assistance and encouragement to dress and groom herself appropriately, or otherwise she might dress herself regardless of the weather. For example, on a hot summer's day Mrs A might dress herself in trackpants and three jumpers. She would then complain that she was extremely hot but refuse to remove any of her jumpers.
- did not reference her glaucoma, which affected Mrs A's sight.

Mrs A's doctor gave evidence that he had been aware of greater limitations to Mrs A's capacity but also felt he was only allowed to complete the medical report based on Mrs A's responses.

The Tribunal found that the doctor's questionnaire did not accurately capture Mrs A's functioning level or care needs, set aside Centrelink's rejection, and ordered Centrelink to obtain a fresh professional questionnaire from Mrs A's treating health professional.

²⁵ [Grenville and Secretary, Department of Social Services \(Social security\)\[2024\] ARTA 715](#).

Recommendation 32: That Services Australia modify the Adult Disability Assessment Tool and Disability Care Load Assessment forms to clearly explain the role and responsibility of treating health professionals when providing evidence of care needs.

Recommendation 33: That the Department of Social Services and Services Australia develop clearer guidance and training for treating health professionals about their role and responsibilities completing assessment forms.

Recommendation 34: That Services Australia establish a dedicated hotline for treating health professionals who require assistance to complete Adult Disability Assessment Tool or Disability Care Load Assessment forms or additional information regarding their role in the claim process.

Care assessment tools undervalue supervisory care needs

Eligibility for Carer Payment requires assessment of both active and supervisory care needs. Both the ADAT and DCLA processes focus heavily on active care despite supervisory care being critical in many cases, noting supervisory care can be far more time-consuming than hands-on physical assistance.

Her daughter has a mental illness and is scared to be left alone. He needs to be there to make sure she takes her meds but also help her de-escalate her panic attacks, etc.

— Statewide Queensland

In 2015, the Department of Social Services launched a comprehensive review of Carer Payment and Carer Allowance, specifically addressing a number of factors including the limitations of the ADAT in:

- assessing care needs for non-physical disabilities, such as psychosocial conditions
- capturing episodic or fluctuating conditions that require ongoing care and monitoring, including between periods when most severe
- accounting for the compounding effects of multiple health conditions on care requirements
- recognising the substantial role carers play in coordinating and accessing services.

After input from medical and carer organisations, a comprehensive pilot commenced, only to be abruptly discontinued in 2017 without explanation. When the legislative instrument reached its 'sunset' in 2018, the existing ADAT was reintroduced without change. Knowledge gained through the pilot has not been made public.

The most recent official review of the DSP Impairment Tables (2022-23) resulted in notable improvements to this assessment tool, including improved guidance relating to episodic and fluctuating conditions. Given that, and longstanding issues regarding the efficacy of carer payment assessment tools, EJA calls for a review of both the ADAT and DCLA. It would also be useful to align requirements, including conditions relating to the suitability of Aboriginal Health Worker assessments for adults and children.

Two issues requiring immediate attention are the low weighting of supervisory care, and the poor recognition of psychologists' expertise in relation to adult claims

Two issues requiring immediate attention are the low weighting of supervisory care, and the poor recognition of psychologists' expertise in relation to adult claims.

Low weighting of supervisory and other care

The ADAT and DCLA processes consider both active and supervisory care, however, it is not uncommon for EJA Member Centres to advise clients who have had their Carer Payment claim rejected because constant supervisory care has not been considered 'enough' to satisfy eligibility requirements. This issue was recently identified in an ART case involving a father caring for his young adult daughter:²⁶

It is not uncommon for EJA Member Centres to advise clients who have had their Carer Payment claim rejected because constant supervisory care has not been considered 'enough' to satisfy eligibility requirements

Mr Malgham (a pseudonym) was providing care for his daughter who has a serious mental health condition. While not physically ill, she was unable to take care of herself. Ms Malgham:

- would not eat, even when food was placed in front of her, unless her father told her to eat and supervised her while eating. She had lost a lot of weight in a short time and at the time of hearing, weighed 48kg.
- did not get up and take herself to the toilet unless she felt pain, occasionally having accidents, so her father had to prompt her to go to the toilet.
- would not shower or clean her teeth unless her father made her. She had attempted suicide twice, so when she was showering or toileting her father took her to the bathroom, then waited outside the door so she was not left alone. He would remind her of each step she had to take to shower or clean her teeth through the door and kept checking that she was alright.
- had not shown any improvements in the last year, with her condition appearing to be deteriorating.

Her father's claim for Carer Allowance was rejected on the basis that the professional questionnaire score was eight, which is lower than the minimum required professional questionnaire score under the ADAT.

²⁶ Recognising the role of carer payments, including those to male carers, in supporting care of women and girls: [Malgham and Secretary, Department of Social Services \(Social security\) \[2025\] ARTA 648](#).

The case of Mr Malgham suggests that assessment questions should be reworked to increase recognition of supervisory care needs to account for a need for a constant presence, cognitive supervision requirements, safety monitoring, emotional support and de-escalation. It also raises questions regarding the weighting of medical evidence and carer evidence and/or the level at which the medical evidence score threshold is set.

Assessment questions should be reworked to increase recognition of supervisory care needs to account for a need for a constant presence, cognitive supervision requirements, safety monitoring, emotional support and de-escalation

The ADAT and DCLA forms also fail to measure activities directly related to care that may be required while the person receiving care is not present. In general terms, Carer Payment is not payable for basic household chores that cannot be done during caring time, including time spent shopping, cooking, cleaning, or even catching up on lost sleep.

Recommendation 35: That the Department of Social Services make available the evaluation and findings of the 2015–2017 Adult Disability Assessment Tool review and pilot.

Recommendation 36: That the Department of Social Services and Services Australia jointly instigate a review of carer assessment tools, including the Adult Disability Assessment Tool and Disability Care Load Assessment questionnaires, and legislative instrument, with the review process aligning with the recent review of the Disability Support Pension Impairment Tables.

Recommendation 37: That Services Australia and the Department of Social Services develop culturally appropriate assessment processes, in consultation with First Nations communities, that recognise the breadth of First Nations care work, including kinship care arrangements and cultural obligations.

Exclusion of psychologists from adult assessments contradicts evidence-based practice

Section 1.1.T.170 of the *Social Security Guide* describes who can be considered a treating health professional. The list includes a medical practitioner, a registered nurse, an occupational therapist, and a physiotherapist for adults or children. A member of an Australian or state/territory Aged Care

Assessment Team may be included for adult assessments. An Aboriginal health worker may be considered a treating health professional for a child or adult, although the Guide outlines different requirements for each. If for a child, the Aboriginal health worker must be employed in a clinical role by a health service in a remote location. If for an adult, the claimant must live in a remote area such as a remote Aboriginal community, the care receiver's medical condition must have been originally diagnosed by a medical practitioner, and there must be a likely delay obtaining a report from one of the other listed treating health professionals. For children (DCLA assessment), a treating health professional may also include a speech pathologist or psychologist.

The exclusion of psychologists from adult assessments is illogical given that psychologists are often the treating health professionals most familiar with the impacts of mental health and other cognitive conditions and ways in which it affects their patient's functional limitations and behaviour, making them best-placed to provide accurate medical evidence about care needs. This is particularly relevant given growing recognition of psychiatric, intellectual and cognitive impairments as significant contributors to disability and care requirements. The exclusion of a psychologist's expert opinion was an issue in the case of Ms Malgham (outlined above), where her psychologist's opinion could not be used for the purposes of calculating a professional questionnaire ADAT score. It is also an issue seen by EJA Member Centres.

The exclusion of psychologists from adult assessments is illogical given that psychologists are often the treating health professionals most familiar with the impacts of mental health and other cognitive conditions

Case study: Natasha

Natasha's son, Abraham, was diagnosed with autism spectrum disorder (ASD) and attention deficit hyperactivity disorder (ADHD) when he was in primary school. Natasha subsequently claimed Carer Allowance as caring for Abraham allowed her little time to do anything else. Abraham's psychologist, who specialises in ASD, supported her claim by completing the appropriate form: the Disability Care Load Assessment (DCLA). Natasha's claim was granted.

When Abraham was approaching 16 years of age, Services Australia contacted Natasha and told her that, in order to keep Carer Payment, she would have to provide new medical evidence using the Adult Disability Assessment Tool (ADAT). Abraham's long-term psychologist again supported Natasha, completing the ADAT. This time, Natasha's claim was rejected – not because Abraham required less care but because current policy does not allow consideration of a psychologist's evidence for an ADAT.

Services Australia suggested that Natasha take Abraham to his GP, and ask the GP to complete an ADAT.

Natasha was frustrated by the rigmarole, which included getting Abraham to another appointment which she would have to pay for. She could not understand why Centrelink accepted the psychologist's evidence within the first few months of diagnosing and treating Abraham, but not after years of treating her son. She was also at a loss to understand why Abraham's GP's evidence was considered more authoritative when he had limited knowledge and understanding of Abraham's condition affected his need for care.

This inconsistency of allowing psychologist's opinions for child assessments but not adult assessments becomes even more stark when compared to recent improvements in other areas of social security. The 2023 amendments to DSP Impairment Tables extended the list of treating health professionals qualified to provide medical evidence on 'brain function' to include all psychologists (not just clinical psychologists). The failure to apply similar logic to carer payment assessments is without justification; also creating unnecessary complexity in the social security system.

Recommendation 38: That the Federal Government amend the *Adult Disability Assessment Determination 2018* to include psychologists as approved treating health professionals for Adult Disability Assessment Tool assessments, consistent with current child assessment criteria and evidence-based best practice.

Restrictive definition of ‘constant care’

The term ‘constant care’ is not defined in the *Social Security Act*, but is interpreted in policy guidance as requiring that care be provided for a ‘significant period’ that ‘roughly equates to a normal working day’ (Section 1.1.C.3.10, *Social Security Guide*), or around eight hours per day on a daily basis.

The rigid interpretation of ‘constant care’ is problematic, including for separated parents caring for disabled children or adults. A shared care arrangement where one parent provides care most days, with the child spending alternate weekends with the other parent, can represent a full-time caring equivalent. Many separated families operate on fortnightly care cycles that align with custody arrangements and family court orders. The current interpretation also fails to recognise that many parents continue to provide care on days where their child is not technically in their care. This issue was recently considered in an Administrative Appeal Tribunal (the precursor to the ART) case, supported by an EJA Member Centre.²⁷

Ms H (a pseudonym) applied for Carer Payment for her 11-year-old son J who, records showed, lived one week with his mother in a regional town and the alternate week with his father in another regional town under a shared custody arrangement.

J had multiple severe disabilities including dyspraxia, ADHD, speech disorder, anxiety, motor coordination problems, behavioural issues and intellectual disability. J required intensive behavioural management at school and approximately 100 medical appointments each year.

Ms H’s claim for Carer Payment was rejected on the basis she did not provide ‘constant care’, and care was not being provided in the ‘home of the care receiver’; a decision affirmed by the first tier of the AAT.

Despite the shared custody arrangement, Ms H provided continuous care management. Even during the weeks that J was scheduled to stay at his father’s house, Mrs H was called to school three or four times weekly for behavioural emergencies, attended the school two to three days per week, managed virtually all medical appointments, and met the school bus daily to get J to exercise before classes. J’s father confirmed to the AAT that J actually spent four to five nights per week with Ms H even during his designated weeks.

Ms H’s appeal was successful, with the Tribunal finding that Ms H provided constant care “to all intents and purposes” despite shared custody; being constantly available for emergencies, managing all care coordination, and that employment was practically impossible due to caring responsibilities. The location of the care was not determinate.

²⁷ [Hawkins and Secretary, Department of Social Services \(Social services second review\) \[2018\] AATA 108](#).

Assessment of 'constant care' or 'daily care and attention' would be more effective if re-defined to assess care needs and the impact of care on employment capacity. This would better recognise the diverse ways carers provide essential care and support, particularly where parents are separated and in communities where extended family networks and flexible arrangements deliver better outcomes for care recipients.

Problems with the need to demonstrate 'constant care' are also evident in the way carers need to track care and respite from care, which can create an overwhelming administrative burden for carers already managing complex responsibilities

Problems with the need to demonstrate 'constant care' are also evident in the way carers need to track care and respite from care, which can create an overwhelming administrative burden for carers already managing complex responsibilities as demonstrated by a recent ART case:²⁸

Ms Jennings (a pseudonym) was relocating from one region to another, modifying her new home for her elderly mother's accessibility needs. During this time, her mother travelled between Ms Jennings' new home and the homes of other family members, with Ms Jennings sometimes travelling to provide care for her mother at different locations.

When Services Australia assessed the situation, they calculated that Ms Jennings' mother had been away from her home for more than 63 days and had exceeded the 63-day annual limit for temporary cessation of care. Services Australia raised a debt of more than \$11,000.

Ms Jennings demonstrated to the Tribunal that she had provided care for all but 61 days of the calendar year, providing detailed calendars, text messages confirming travel dates, and letters from friends who cared for her dog when she travelled to provide care elsewhere. The Tribunal found Ms Jennings had provided "constant daily care" throughout the period, whether at her own home or when staying with her mother elsewhere, and that she had been entitled to Carer Payment throughout the period.

²⁸ [Jennings v Secretary, Department of Social Services \[2025\] ARTA 646](#).

The limited concept of supervisory care is particularly problematic for First Nations carers. Not only are First Nations carers more likely to be providing multi-generational care, the 2022 National Carer Survey found that 43 per cent of First Nations respondents cared for more than one person, with 17 per cent caring for three or more people.²⁷ First Nations women's care work can involve complex multitasking and supervisory responsibilities that extend to kinship networks and community obligations. Current assessment frameworks fail to capture this breadth of caring, including care coordination across extended family networks and the cultural load of maintaining connections to Country and culture while providing care.²⁸

Problems with the need to demonstrate 'constant care' are also evident in the way carers need to track care and respite from care, which can create an overwhelming administrative burden for carers already managing complex responsibilities

Given the absence of a statutory definition of 'constant care', reform is required to redefine carer payment eligibility requirements to reflect full-time employment equivalence.

Recommendation 39: That the Department of Social Services amend the *Social Security Guide* to include a definition of 'constant care' that reflects full-time employment equivalence.

Restrictive definition limiting location of care

The *Social Security Act* requires that for Carer Payment, 'constant care must be provided in a private residence that is the home of the care receiver' (section 197E). While not required to live in the same home, the constant care requirement in the private residence of the care receiver excludes carers who provide intensive care and support in their own homes. This provision creates particular barriers for families in 4R areas who rely on extended family networks and flexible caring arrangements.

The restrictive nature of the almost-cohabitation requirement particularly disadvantages First Nations women in remote areas, where housing constraints, family structures, and cultural practices often necessitate flexible living arrangements and extended family networks to provide essential support. A carer may be providing care well in excess of full-time equivalent working hours via flexible arrangements across multiple households and locations. That includes caring for children, elderly relatives, and other community members who may not live in the same household and may not always be cared for in their own home, but require ongoing support and supervision.²⁹

29 Klein E, Hunt J, Staines Z, Dinku Y, Brown C, Glynn-Braun K, Yap M (2023). [Caring about Care](#). Centre for Indigenous Policy Research, Australian National University.

Consider this hypothetical example:

- Kath and Margie are both 30-year-old women who are blind.
- Kath lives in Melbourne and has a degree in social work, with support services available to get her to work and a workplace that has installed various modifications and technologies that enable her to work four days a week. Kath's home has a number of modifications, allowing her to do many tasks independently, but she continues to require care at home, which her husband provides.
- Margie lives in a remote First Nations community. She has lived with a number of relatives since becoming an adult but struggles to adapt to new physical environments and carers. She is currently being cared for by two aunties, one whose house she goes to during the day, the other whose house she is at in the early morning, evening and overnight. Margie is unable to perform many key tasks without help and becomes disoriented easily. She requires care during all waking hours and sometimes at night – well over 80 hours of care per week.

The requirement that constant care be provided in a private residence that is the home of the care receiver can also disadvantage parents who have shared care of children, such as separated parents caring for dependent or adult children with disabilities.³⁰

The requirement limiting location of care is a blunt administrative tool that does not measure either the intensity or length of periods of care required. It locks out people who provide equal or greater levels of care who do not live in the carer's home and those caring for a person outside the person's home. These provisions may also operate to restrict the choice of carers available for those requiring care. Instead, questions about why care is not required overnight and whether commuting time suggests not enough care is required are simply questions of fact that should be considered during the claim assessment process.

Recommendation 40: That the Federal Government amend section 197E of the *Social Security Act 1991* (Cth), replacing the 'constant care in home' criteria with criteria that provide a more realistic definition of care requirements as defined by key stakeholders.

Restrictive work limits at odds with school hours

When a child with disability starts school, the dynamics of a caring household change. Most schools operate for approximately six hours daily, totaling 30 hours per week, which is five hours more than the current work allowance. Current work participation limits for Carer Payment recipients prevent carers maximising their income by working while their children are receiving care at school.

What was I supposed to do? Sit at home ... while he's off [at school]?

— Regional Queensland

³⁰ [Hawkins and Secretary, Department of Social Services \(Social services second review\) \[2018\] AATA 108.](#)

Case study: Mara

Mara was granted Carer Payment to provide care for her daughter, Chloe, who has profound medical and behavioural issues. When Chloe started primary school, Mara found some casual work, working her hours around Chloe's school hours. Mara always reported her hours of work and income to Centrelink.

Chloe would often engage in uncontrolled and violent behaviour towards other children, and Mara was frequently called up to the school to deal with disciplinary issues. She subsequently lost her job because of the lengthy periods she was obliged to take off work to attend school and Chloe's medical appointments.

Then Mara received a letter from Centrelink that she was not expecting: a debt for almost \$35,000. Centrelink argued that Mara had lost her eligibility for Carer Payment because she was working more than 20 hours per week (the strict time limit at that time; now 100 hours within a four-week period).

Mara appealed the debt, going through unsuccessful reviews by an Authorised Review Officer and the first tier of the Administrative Appeals Tribunal (AAT) without any help. She'd been struggling, living on a reduced income while repaying the debt, so she was extremely relieved when she found an EJA Member Centre solicitor who said they would help.

Mara's solicitor lodged an appeal with the General Division of the AAT and drafted formal proceedings arguing for the entire debt to be waived given the special circumstances of the case, based on the fact that Mara had kept Centrelink informed of her actions, including Chloe attending school and her income from work. Eventually terms of settlement were negotiated with the Government solicitor under the terms that her remaining debt (\$25,000) would be waived, although she could not recoup the money she had already paid to Centrelink (\$10,000). Despite Mara having good prospects of success if the case went to hearing, she decided she could not refuse the settlement.

The expansion of work-from-home arrangements makes the (average of) 25 hours per week restriction even more burdensome. Many carers could undertake employment that aligns perfectly with school hours, enabling them to increase household income while remaining available for medical appointments and school emergencies. If a woman qualifies for Carer Payment for a school-age child, policy should recognise that working during school hours represent an important opportunity for economic participation without compromising care quality. This change represents a possible budgetary saving, as increased income would reduce the rate of Carer Payment.

If a woman qualifies for Carer Payment for a school-age child, policy should recognise that working during school hours represent an important opportunity for economic participation without compromising care quality

Recommendation 41: That the Department of Social Services amend the *Social Security Guide* at 3.6.4.10 to allow carers with school-aged children to work up to 30 hours per week or, alternatively, during school hours.

Women who are underemployed or unemployed

My client had her Jobseeker Payment cancelled every few months ... for five years! She clearly couldn't engage with the system but it just kept happening. Once we looked at the file it became clear she had a serious undiagnosed mental health issue. It also became clear she'd submitted multiple medical certificates but they kept getting rejected because she was assessed as not having a temporary condition or they were lost by Services Australia. What really got to me was that she told me the stress of those continuous cancellations and suspensions was more stressful than dealing with the domestic violence she'd lived through.

- Statewide Western Australia



Key findings

- The inadequacy of working age income support payments leaves people struggling to afford the basics for themselves and their families, while also undermining their capacity to find work. People in remote and very remote Australia are particularly disadvantaged given substantially higher cost of living than in metropolitan areas.
- Mutual obligation job plans are often not fit-for-purpose, particularly for women in regional, rural, remote and very remote (4R) areas with limited employment opportunities.
- Many women want assistance to find employment but are unable to obtain it through employment service providers that prioritise monitoring of job plan compliance over genuine assistance, partly as a consequence of contractual limitations prioritising tick-box activities.
- The mutual obligation system can be a poor fit for women with significant caring responsibilities, particularly First Nations women balancing traditional caring responsibilities and community obligations.
- The siloing of departmental and program responsibilities between three departments - Department of Employment and Workforce Relations, Department of Social Services and Services Australia - creates administrative burdens for government and undermines access to review of administrative decisions, leaving women in 4R areas unable to establish who to contact to resolve problems or appeal.
- The system lacks the flexibility required to respond to natural disasters, extreme weather and other emergencies that are occurring with increasing frequency in many 4R areas. Limited mutual obligations pauses are inadequate to cover periods during which people cannot reasonably undertake job plan activities or look for work.
- Women in 4R areas are bearing the cost of a mutual obligations framework that causes frustration and distress, while failing to demonstrate employment outcomes. EJA calls for its abolition and redirection of funding to genuine employment support.

How are unemployed or underemployed women supported by the social security system?

Working age payments

There are a range of social security payments targeting people who are unemployed or underemployed. Collectively, these payments are commonly referred to as working age payments.

JobSeeker Payment

JobSeeker Payment (JobSeeker) is the main working age income support payment for people aged 22 to 67 (Age Pension age) who are considered fit for work, including people who are temporarily unable to work due to illness or injury. JobSeeker can also be paid to those who are employed or studying full-time but unable to undertake work or study due to a temporary medical condition, illness or injury, including when people have a job or study to return to (Social Security Guide, 3.2.1.05).

As at March 2025, there were 875,020 JobSeeker recipients.¹ Around 50 per cent of those recipients lived in regional, rural, remote or very remote (4R) areas: approximately 43 per cent regional/rural and seven per cent remote/very remote.² Women comprised 47 per cent of all recipients (387,020).³

JobSeeker is paid at a lower rate than the social security pension rate that applies to Age Pension, Disability Support Pension, Parenting Payment Single and Carer Payment. Harsher income test thresholds and taper rates also mean that payments reduce at a faster rate when a person takes up part-time work.

Youth Allowance (other)

Youth Allowance is the main income payment targeting young people. It is ostensibly divided into two payments which have distinct eligibility and income testing: Youth Allowance (student) and Youth Allowance (other). Youth Allowance (other) is the main income support payment targeting young people who are unemployed or underemployed and not studying full-time. The rate of Youth Allowance (other) is tied to both a person's age and whether they satisfy 'independent' criteria. Even at the highest rate (\$663.30/fortnight), maximum Youth Allowance (other) is \$117.80/fortnight less than JobSeeker (\$781.10/fortnight).

- 16 to 17 years, single, live at home \$410.30/fortnight
- 18 to 21 years, single, live at home \$472.50/fortnight
- 16 to 21 years, single, cannot live at home \$663.30/fortnight

Youth Allowance is addressed in detail in Chapter 5: 'Young women'.

¹ Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#). In this data, and other data provided by the Department of Social Services in this report, people who identify as non-binary are grouped with women. For more information, refer to the data classification process described in the Introduction.

² Ibid (data derived by applying Modified Monash Model to LGA disaggregated data).

³ Ibid.

Parenting Payment

Parenting Payment can be paid to a person who is the principal carer of a child aged under six years (if partnered) or 14 years (if single). Parenting Payment Single is paid at a higher rate than the single rate of JobSeeker (\$982.50/fortnight compared to \$781.10/fortnight), and has a more generous income test.

On 28 March 2025, there were 328,790 Parenting Payment Single recipients, 308,600 of whom were women⁴ (noting Parenting Payment Partnered recipients are not included here as they are not subject to mutual obligations).⁵

Special Benefit

Special Benefit is paid to a relatively small number of people who are not eligible for any other income support payment and cannot earn a sufficient income to support themselves and any dependants, for reasons beyond their control. Special Benefit rules also require that a person is in 'severe financial hardship'; a test which is not applied to other payments. The maximum rate payable is generally the JobSeeker or Youth Allowance rate but Special Benefit has a particularly harsh income test with no income free area or taper rate; it reduces by \$1 for every \$1 of gross income. Centrelink may also reduce Special Benefit if the person receives additional support from elsewhere, including for food, accommodation, utilities and other goods and services.

As at March 2025, there were 6060 Special Benefit recipients.⁶ Around one quarter of recipients lived in 4R areas: approximately 23 per cent regional/rural and two per cent remote/very remote.⁷ Some of these recipients did not have mutual obligation requirements, including children, those caring for a child or someone who is frail, has a disability or is unwell; those of Age Pension age; those with a temporary exemption including expectant mothers close to their delivery date; those who are ill or injured; those who have recently experienced the death of a partner; and those receiving Special Benefit because they do not meet the residency requirement for Age Pension or Disability Support Pension (DSP).

Women comprised just under 50 per cent of all Special Benefit recipients (48,715).⁸

Other social security payments

A number of other income support payments are payable to people looking for work. These include Age Pension, (DSP) and Carer Payment, noting these payments do not have mutual obligations requirements and have more generous income testing than working age payments targeting unemployment. Child Care Subsidy, paid directly to the childcare provider, often provides a lifeline for women with children wanting to enter the workforce or increase their hours of paid work.

4 Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

5 For a further breakdown of Parenting Payment data by region, see Chapter 1: 'Women who are parents and guardians'.

6 Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

7 Ibid (data derived by applying Modified Monash Model to LGA disaggregated data).

8 Ibid.

Supplementary payments

People may also be eligible for the following supplements:

- **Youth Disability Supplement**, a supplementary fortnightly payment to eligible income support recipients to help young people meet the extra costs of living with a disability. Paid to recipients of DSP and also Youth Allowance and ABSTUDY if aged under 22 and assessed as having a partial capacity to work.
- **Pensioner Education Supplement**, a supplementary fortnightly payment of \$62.40 or \$31.20 to assist with some of the ongoing costs associated with study for eligible recipients of some income support payments.

Issues associated with these payments are not addressed in this chapter.

Mutual obligations

The term ‘mutual obligations’ is used to describe the set of activities a person must complete in order to receive their income support payment. These are designed to ensure people receiving payments are actively looking and preparing for work; hence the *Social Security Guide* refers to recipients as ‘jobseekers’. Failure to meet mutual obligations can result in suspension, reduction or cancellation of payment.

Where a person is subject to mutual obligations, they are required to engage with an employment service and enter into a job plan with mutual obligations that should take into account their work capacity, any impairments, their age and whether they have primary responsibility for the care of a child. People with full-time mutual obligation requirements are expected to look for full-time work. Principal carer parents, jobseekers who are aged 55 years or over, and jobseekers who have been assessed as having a partial capacity to work have reduced mutual obligation requirements, including a reduction in the number of hours required to look for work and the capping of work hours they are expected to undertake. A significant portion of people subject to mutual obligations have been assessed as having a partial capacity to work.

Table 1. Partial capacity to work⁹

Payment type	Recipients	Recipients with partial capacity to work	Percentage of total
JobSeeker Payment	875,020	360,570	41
Parenting Payment Single	147,195	23,145	16
Youth Allowance (other)	98,470	10,135	10

9 Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

Reduced mutual obligations for people aged over 55 years

People over 55 years of age have reduced mutual obligations requirements:

- **Age 55 to 59 years with less than 12 months on current income support:** 30 hours per fortnight of work where income is equal to or more than the national minimum wage; 30 hours per fortnight of self-employment where net business income is equal to or more than the national minimum wage; or at least 15 hours paid work combined with approved voluntary work or study.
- **Age 55 to 59 years with 12 months or more on current income support:** 30 hours per fortnight of study, paid work, self-employment or voluntary work; or a combination of voluntary work, paid work and self-employment.
- **Age 60 or above:** 30 hours per fortnight of study, paid work, self-employment or voluntary work; or a combination of study, voluntary work, paid work and study.

Reduced mutual obligations for parents

Once a parent's youngest child turns six, people on Parenting Payment Single are subject to mutual obligations which require they seek work or undertake study. Principal carers of children aged between six years and 15 years can fulfil their mutual obligations by undertaking 30 hours per fortnight of one, or a combination, of the following:

- Study
- Self-employment
- Looking for and taking up an offer of work unless:
 - › childcare isn't available during their work hours
 - › it involves a commute of more than two hours per day
 - › the most cost-effective travel exceeds 10 per cent of their gross wage
 - › they will be less than \$50 per fortnight better off after deducting costs.

Principal carers may also fulfil mutual obligations by volunteering at an approved organisation, with the amount of volunteering allowed increasing after a person turns 55 years old.

Administration of mutual obligation requirements

Most jobseekers are automatically referred to Workforce Australia Online during their participation interview, with referral undertaken by the Department of Employment and Workplace Relations (DEWR). Select jobseekers do not require a referral to a provider but instead manage their obligations through Workforce Australia Online.

The main employment services provider in regional and rural Australia is Workforce Australia. Disability Employment Services provide employment assistance to people with disabilities, chronic illness or injury that prevents them undertaking full-time work. In remote and very remote Australia, employment services are provided through the Community Development Program (CDP), although this system is being replaced by the Remote Jobs and Economic Development (RJED) program (see below). Most people who are subject to CDP/RJED arrangements are First Nations.

The Parents Pathways program supports parents with children aged under six to prepare for future employment through education and training pathways, noting participation in Parents Pathways is voluntary.

Points Based Activation System and Targeted Compliance Framework

Mutual obligations 'activity requirements' are monitored through the Targeted Compliance Framework (TCF). Payments can be temporarily suspended if a person misses an appointment or does not meet a mutual obligation requirement and has not contacted their provider to discuss why they missed the requirement. Before a payment is suspended, the person is warned and informed that they have five days to complete their mutual obligations to prevent suspension. Demerit points accumulate so that after multiple demerits, payments can be reduced or cancelled.

Participants in Workforce Australia employment services are subject to the Points Based Activation System (PBAS), under which different job search and 'job readiness' activities are awarded points. The default is set at 100 points per month. There is an automatic reduction of points target from 100 points to 80 or 60 points for principal carers of children, people with disability or chronic illness, older workers and people who reside in 4R areas where there are limited or no employment opportunities. Under PBAS, people must generally submit a minimum of four job applications per month, which may be combined with other activities such as updating a resume, attending a job expo, participation in employability skills training, attending a job interview, Work for the Dole, accepting a job offer or undertaking paid work.

The amount of activity required can be onerous. For example, people with a 100-point requirement must submit 20 job applications per month. In Disability Employment Services, people with chronic illness or disabilities are generally expected to complete 12 job applications per month.

What is working well?

Abolition of Parents Next

In 2023, the Government abolished the ParentsNext program, a compulsory pre-vocational program for 'vulnerable' parents, intended to provide support into study and employment. At the time of its abolition, ParentsNext applied to almost 100,000 Parenting Payment recipients with children aged nine months to six years, who had not worked for six months. About 96 per cent of those in the program were women.¹⁰

Unfortunately, many women subject to ParentsNext found program requirements onerous and difficult to complete, with approximately 20 per cent of participants breached for failing to fulfil their mutual obligations,¹¹ putting their parenting payment at risk or having it cut off altogether.

The Select Committee on Workforce Australia¹² found that the ParentsNext process did not enable a proper assessment of a person's barriers to employment or their goals, with the process adding to the pressures many parents face caring for young children while not demonstrably improving their employment pathway. In late 2024, a new voluntary program was introduced to support parents and carers of children seeking assistance to enter or re-enter the labour market: Parent Pathways, which does not include mutual obligations requirements.

Improved remote employment servicing

The CDP was developed to be flexible enough to accommodate the local circumstances of remote communities, including provisions for cultural obligations and Sorry Business, allowances for extreme weather events, and special consideration for participants with limited English literacy. Work for the Dole activities were intended to be culturally appropriate and beneficial. Instead, the CDP has been widely criticised for significant shortcomings, including failure to address practical barriers in remote communities, failure to accommodate cultural obligations, and participants being subject to stricter obligations than those outside CDP, with more frequent payment suspensions.

In 2019, nine Aboriginal communities in the Shire of Ngaanyatjaataku took legal action against the Federal Government, arguing the CDP violated the *Racial Discrimination Act*. Data supporting their case were striking, including CDP participants receiving more than half of all Work for the Dole penalties despite comprising only four per cent of participants nationwide. By June 2018, almost 560,000 penalties had been issued in remote areas, with 80 per cent of penalised participants being First Nations.¹³

10 Australian Human Rights Commission (2019). [ParentsNext, including its trial and subsequent broader rollout: Submission to the Senate Community Affairs References Committee](#).

11 Federal Government Senate Standing Committee on Community Affairs (2019). [ParentsNext, including its trial and subsequent broader rollout](#).

12 The Select Committee on Workforce Australia Employment Services (November 2023). [Rebuilding Employment Services](#).

13 The Australia Institute (2018). [Remote control: The Community Development Program, remote Australia's Work for the Dole scheme](#).

A two-stage process is underway to transform remote employment services, replacing the CDP with systems designed to emphasise community-led activities, local decision-making and economic opportunities. The first is the introduction of the Remote Jobs and Economic Development (RJED) program, which aims to create 3000 new jobs in remote Australia in the three years from 2025 to 2027. That includes funding for community organisations to assist with the identification of beneficial jobs and projects. The second stage will provide a flexible employment service through the Remote Australia Employment Service (RAES), commencing 1 November 2025.

The shift from CDP to RJED/RAES reflects increased investment in training and resources which aim to deliver higher quality, culturally safe services specifically tailored to remote jobseekers' needs. Mutual obligation activity requirements will remain voluntary until 2027, providing a transition period for service improvements. While it is very early days in the roll-out of RJED and RAES, EJA hopes the resetting of approach, including prioritising community knowledge, will prove more effective than the CDP.

Reduced points targets for regional areas

Reduction of PBAS points targets for Workforce Australia participants in 4R areas recognises unique barriers to employment – including fewer available positions, limited transport options, and greater distances to travel to training, interviews or potential employment. These reduced targets can be essential to ensure participation requirements remain achievable for women in 4R areas.

Reforms to compliance measures

Until 28 October 2024, people who intermittently failed to meet their requirements had only two business days after being notified of an imminent suspension for failure to fulfil their mutual obligations during the preceding period or to supply a valid reason for not doing so, or a suspension would be applied. That period has been extended to five business days.

These changes have delivered significant improvements, reducing the number of payment suspensions by 20 per cent within 12 months. EJA analysis shows that from January to March 2024, only 34 per cent of warnings helped to avoid payment suspension, while for the same period in 2025, 54 per cent of warnings helped avoid payment suspension.¹⁴

¹⁴ Department of Social Services (2024). [TCF Public Data – 1 January 2024 to 31 March 2024](#). Department of Social Services (2025). [TCF Public Data – 1 January 2025 to 31 March 2025](#)

Reforms to Disability Employment Services

The 2024-25 Federal Budget announced that the current Disability Employment Services (DES) program will be replaced by a new program, Inclusive Employment Australia, to be launched in November 2025. These reforms form part of broader disability sector changes, including responses to recommendations made by the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability and the National Disability Insurance Scheme Review.

The Inclusive Employment Australia program will aim to better assist the one in five Australians, about 5.5 million people, who live with disability and experience higher levels of disadvantage preparing for and finding employment. It aims to “put participants at the centre of the service”,¹⁵ and to improve and simplify services for employers, service providers and people looking for work. Participants should receive customised and tailored support that reflects the range of ways people find and keep a job, including a range of pre-employment, job search and in-employment supports.

A Centre for Inclusive Employment is being established to develop best practice, evidence-based information to improve disability employment outcomes, and to help providers deliver high-quality and effective employment services.

Reforms to complaints processes

In 2024, the Federal Government strengthened the complaints process for people who experience a problem engaging with employment services. These changes aim to make the system more accessible and effective, particularly for people in vulnerable circumstances, and to enable compliance with the Ombudsman’s *Better Practice for Complaints Handling Guide*.¹⁶

Changes include:

- Replacement of the system whereby complaints were automatically referred back to the employment service provider who had made the decision, allowing first-step, independent consideration of a provider’s decision by DEWR staff
- Triaging of telephone calls to be more sensitive to complaints
- A commitment to publish reports every six months to allow independent scrutiny of both the employment services system and the complaints process.

Close review of the system, with clear recommendations for reform

In 2024, EJA welcomed the scrutiny applied to the employment services system and the 75 recommendations of the Select Committee on Workforce Australia (the Committee) in [Rebuilding Employment Services – Final report on Workforce Australia](#). The Committee found the system “can’t be fixed by tweaks” and recommended a comprehensive rebuilding of the system, including a much stronger role for government.

¹⁵ Department of Social Services (2025). [Inclusive Employment Australia](#).

¹⁶ Commonwealth Ombudsman (2023). [Better Practice Complaint Handling Guide](#).

The Federal Government released its response to the Committee's findings in July 2024, agreeing with the Committee that reform is necessary, while acknowledging that large-scale reform will take time to design and implement. Unfortunately, 12 months later, reform has been modest. While EJA understands that reform of employment services is a complex public policy operation, action is urgently required. More than 900,000 people are currently required to engage with an employment services system that is not fit-for-purpose.

What needs to change?

This report is being prepared at a specific point in time at which the legality, utility and fairness of the mutual obligations system is the subject of considerable scrutiny. EJA is awaiting the release of a Federal Government commissioned report by Deloitte and another by the Commonwealth Ombudsman regarding the operation of the Targeted Compliance Framework, with more detailed analysis and recommendations by EJA pending.

Working age payment rates are too low and people cannot afford the basics

Social security remains a vital safety net for women who are unemployed or underemployed but its effectiveness has decreased as working-age payments have declined against poverty measures over the last two decades. Payment rates have failed to keep up with the cost of living in 4R areas, particularly in remote and very remote areas where the cost of essentials is significantly higher than the same products in urban centres.¹⁷

Payment rates have failed to keep up with the cost of living in 4R areas, particularly in remote and very remote areas where the cost of essentials is significantly higher than the same products in urban centres.

The 2023-24 Federal Budget increased the base rate of working age payments such as JobSeeker and Youth Allowance by \$40 per fortnight but payments remain inadequate, leaving some women in 4R areas unable to afford rent, utilities, food, medicine, transport and digital connectivity. The single JobSeeker rate currently sits at around \$56 per day, well below the pension rate of \$82 per day.

You're working full-time applying for jobs and then you still can't afford to rent a house.

— Very remote Northern Territory

Rate of payments are not sufficient for people to live in remote communities.

— Statewide Queensland

17 Office of Impact Analysis (14 February 2025). [Supporting Remote Cost-of-Living and Food Security](#).

I think Jobseeker needs to be doubled ... with payments [adapted] to recognise where women have children or elderly people in their care so they can care for those people adequately.

— Very remote Northern Territory

We regularly speak to clients seeking advice on eligibility for payments such as Disability Support Pension or Carer Payment simply because Jobseeker Payment is not enough to live on. We've noticed an increase in these complaints with the rising cost of living. The clients we speak to spend [the] majority of their payment on rent, leaving them with very little to spend on other basic necessities.

— Statewide Queensland

Caseworker experience

Providing social security advice to clients in rural and regional Tasmania, I've seen person after person, particularly women, making choices they should not have to make as they struggle to survive on JobSeeker Payment. Time and time again they are:

- being forced to choose between essential utilities or food, noting those in rural areas are routinely paying more for groceries
- limiting showers to every second day due to electricity and water costs
- enduring cold, damp housing during the Tasmanian winter due to unaffordable heating/ electricity or the cost of firewood as a lot of clients still use wood heaters
- rationing water to avoid the significant cost of refilling water tanks as they don't have 'town water'
- struggling with extremely limited housing options, often in poorly insulated weatherboard houses, with rental costs far exceeding what they get from Centrelink. That's getting worse as people leave metro areas looking for cheaper housing options pushing regional housing prices up.
- being unable to replace broken or worn-out household items and clothing
- reducing or rationing prescribed medications as they are unable to afford the full dosage
- delaying or forgoing medical treatment because of the cost of medical appointments and travel costs, resulting in prolonged suffering and declining health
- restricting social participation because they cannot afford petrol or public transport. Many people are now really isolated with very limited support or transport – cut off from community, healthcare and social connection.

People who need to rely on working age payments over an extended period are particularly disadvantaged as the impact of low rates of income support compound, undermining the intention of payments to support people to re-enter the workforce

People who need to rely on working age payments over an extended period are particularly disadvantaged as the impact of low rates of income support compound, undermining the intention of payments to support people to re-enter the workforce. Put plainly, people without secure housing, telecommunications and transport are going to struggle to meet mutual obligation requirements.

The payments are punitive. It's the way we treat people who are the most vulnerable in society, expecting these payments will lift people out of poverty when they can't afford the basic necessities of life. How are they supposed to make purposeful change?

– Statewide Queensland

Housing and Centrelink - they're all wrapped up together. If they haven't got those things ... everything else fails. So, you know, a young girl's been homeless for two years, can't wash her clothes, can't go to job interviews - so I'm linking her in with Orange Sky to get her laundry done, getting the free Pets in the Park once a month for her cat, those sorts of things.

– Statewide Australian Capital Territory

Clients living in overcrowded houses often have phones go missing. Stuff goes missing. Some clients lose their phone, or it gets stolen ... so they aren't able to report, or let the job providers know, or even know when the appointment is.

– Remote Northern Territory

I think this is what gets me about these systems is that people are continually disadvantaged as a result of poverty.

– Rural Western Australia

People can't afford to go to the dentist. You're not going to get the good customer service job if people flinch when you smile.

– Statewide Queensland

As government and business have shifted to an increasing reliance on technology, people with very low incomes are pushed to incur technology-related expenses, including purchasing phone and internet credit, phones and computers that can access myGov, and/or traveling to locations to access IT. People in 4R areas also bear the brunt of digital exclusion (discussed below) which, in areas where digital systems are available, comes with significant financial costs.

People in 4R areas may also be stung by higher costs for food and transport. Remote Area Allowance (RAA) provides supplementary support for those in designated remote areas, providing modest additional payments to help offset higher cost, but it remains at a low \$18.20/fortnight for a single person or \$15.60/fortnight for each member of a couple. RAA has lost significant value since its introduction as it is not indexed and has not been increased in 25 years. EJA continues to advocate for an increase and indexation of RAA – as recommended by the Senate Standing Committee Inquiry into the Extent and Nature of Poverty in Australia (see recommendation 49 [Social Security for Women Outside Our Cities: Service Delivery Barriers](#), p42).

Recommendation 42: That the Federal Government increase working age payment rates to provide parity with pensions, with indexation linked to both inflation and wages.

Mutual obligations are punishing individuals for low employment opportunities

Women on working age payments in 4R areas are required to seek work but often in very limited labour markets. The lack of industry and industry diversity restricts employment options, with many positions following seasonal patterns. Job vacancies are scarce. Labour market efficiency, the matching of jobseekers to available jobs, is also lower than in metropolitan areas.¹⁸

Regional employment rates mask even starker contrasts. For example, economic activity in a region that has mining can overinflate employment rates by disguising large areas where unemployment rates are very high. In this scenario, many of the financial benefits of employment leave the region with fly-in fly-out (FIFO) workers.

The *Social Security Guide* allows employment service providers to reduce the number of required job searches in response to “the state of the labour market and the transport options available to the person in accessing that market (e.g. taking into account travel time)” (section 3.11.1.10), but many women in 4R areas feel like they’re being pushed to find jobs that do not exist.

She’s like, “We want to work, but we can’t find work. We can’t. It’s just not going to happen because the actual job market needs to keep up with the need and that’s not happening in any way, shape or form”.

— Regional Victoria

I think there’s very few people who collect Jobseeker because they don’t want to work. I mean it’s not much money and it’s a lot of effort to go to. I continually have people say to me, “This is so hard to get” ... And what’s the go with the records management system? When we put a document in, what happens to it? How do they lose documents?

— Statewide Australian Capital Territory

The limited jobs ... it ignores the reality of lack of jobs. There’s a lot of pressure on people.

— Very remote Northern Territory

I talked to a lot of people who are over 50 and unfit for work but can’t get DSP, and there are no jobs. It’s a dead zone – just waiting for Age Pension age.

— Statewide Queensland

First Nations people are disproportionately affected by poor labour market opportunities in 4R areas, noting 52 per cent of the working-age Indigenous population reside in regional or remote regions, compared to 22 per cent of the general population.¹⁹ For women with specific barriers to employment, the challenges are even greater.

We’re having 17-year-olds graduate Year 12 for what? They can’t even read and write half of them ... How are they supposed to get a job if they can’t even read and write?

— Very remote Northern Territory

The recruitment structures are just very difficult ... Then jobs that are going won’t accept them because they either have a criminal record or they can’t get a car or they don’t have a driver’s licence or all of the above.

— Very remote Northern Territory

¹⁸ Jobs and Skills Australia (2024). [Better Together: The Jobs and Skills Report 2024](#).

¹⁹ Ibid.

Data shows a disproportionate incidence of penalties for people in areas where there are fewer jobs, with penalties for not meeting employment services requirements hitting women in 4R areas hard. The information provided by community workers during EJA's research confirms the observations and findings of the Select Committee on Workforce Australia, including significant concerns regarding the poor operation of the TCF and harm it causes many of those subject to it. Despite changes to the PBAS points system to reduce point targets for people living in areas with higher unemployment, points targets remain too high. The system is punitive, particularly for women in vulnerable situations.

Systems issues undermine individual 'compliance'

Mutual obligation requirements not fit-for-purpose

The *Social Security Guide* states: "Job seekers' mutual obligations should be tailored to job seekers' individual circumstances" (section 3.1.1), yet many women find mutual obligations requirements onerous and unhelpful. That includes the process of claiming JobSeeker and requirement to establish initial contact with an employment service - a prerequisite to payment of JobSeeker or Youth Allowance (other).

She had to wait a week to get an appointment, then spend half a day waiting on that appointment and job plan. She was then asked for information that was already on her form. Why does this process exist? Maybe it should be if you haven't filled out that Workforce survey or whatever, but when you have, and that's the information they need ... why? The job plan that she got was just a stock standard basic job plan - no modifications.

— Regional Tasmania

The PBAS system was introduced in 2022 to provide people with greater flexibility and choice about which activities will help them towards employment. Despite that, complaints about job plans not being useful or fit-for-purpose are common.

It is quite an issue in terms of the number of complaints we deal with where people want advice because they're not meeting their obligations or payments are being cut off. And the whole reason for that is because someone's asking them to sign a job plan above and beyond their assessed capacity.

— Regional Victoria

Clients aged 55+ seem to struggle more with their mutual obligation requirements due to age-related health conditions and women in particular are often caring for elderly parents and/or looking after grandchildren.

— Regional Tasmania

Her sister is [on Jobseeker because she's] having trouble trying to get onto Disability Support Pension. She's just been diagnosed with Parkinson's so she can't move, can't walk or anything and they want her to still attend looking for jobs and things but she can't physically do it.

— Regional Queensland

Clients say they cannot work and have medical advice encouraging them not to work, so it's hard for them to understand why they are required to look for work as part of their Jobseeker Payment obligations – especially where they've had a medical certificate rejection.

– Statewide Queensland

A sense of 'jumping through hoops' leaves many women frustrated, eroding self-esteem and self-efficacy

Some people were on ParentsNext and had Work for the Dole obligations at various points and had either a Cashless Debit Card or a Basics Card. So, they had this very complex array of conditionality, and for some people engaging with that, it was just too much. So sometimes people would be on it for a while like social security and they'd drop off [because] the obligations weren't realistic for them to be meeting.

– National

Plenty of people with partial capacity can't meet their requirements.

– Statewide Queensland

A sense of 'jumping through hoops' leaves many women frustrated, eroding self-esteem and self-efficacy. The 'pointless' nature of many mutual obligation activities can also undermine willingness to comply with the system in good faith. That includes people applying for poor-fit jobs they do not want, which creates unnecessary work for employers who receive large numbers of nonsense job applications.²⁰

Getting five points for a job application is kind of the problem with a one-size-fits-all approach, right? Because if she's putting her resume into a Woolworths site and clicking through it and doing it – fine, but a professional job application takes hours. She said, "What I'm going to have to do is apply for maybe three jobs a week that are jobs that I want, and then I'm going to flood Coles and Woolworth and McDonalds ... to just get my points up".

– Regional Tasmania

Clients have reported that they knowingly apply for unsuitable roles simply to meet monthly targets.

– Regional Tasmania

²⁰ The Select Committee on Workforce Australia Employment Services (November 2023). [Rebuilding Employment Services – Parliament of Australia](#)

Social security legislation prohibits the inclusion of some forms of activity as unsuitable for job plans and prohibits the requirement to take-up “unsuitable” employment (*Social Security Administration Act*, section 40X), yet women continue to be subject to mutual obligations requirements that are not fit-for-purpose. Cookie-cutter mutual obligation requirements with attached penalties for compliance failure are proving counterproductive to genuine employment seeking.

Cookie-cutter mutual obligation requirements with attached penalties for compliance failure are proving counterproductive to genuine employment seeking

There are some employment providers that get people jobs. Not sure of the retention rate but overwhelmingly we see people placed into jobs they can't stay in.

– Statewide Queensland

Clients often report a 'tick-the-box' approach and have told me that providers have claimed credit for job placements they did not facilitate or have put them forward for totally unsuitable roles.

– Regional Tasmania

Job service providers track activities and appointment attendance, with default systems requiring that participants regularly report job search efforts through their myGov account, including uploading evidence of job applications. The default to digital systems compounds other difficulties people experience engaging with Centrelink and reporting PBAS compliance.

Our client reported a mutual obligation breach but denied ever receiving notice of the tasks they needed to complete, however, when we looked at the notice letter online the client did not understand that she had to scroll down to see page #2 of the correspondence so had missed that important information.

– Regional Tasmania

She has no idea what she's got to do even if she explains it to them step by step. They don't know how to use computers [but] if they don't report on time, they're cut off.

– Remote New South Wales

Engagement can be obstructed by poor internet connectivity.

A client in rural area reported that they must climb a small hill in the paddock next door to access mobile coverage, resulting in missed calls and breaches of obligations.

– Regional Tasmania

Women are forced to travel long distances to reach service providers or to complete other activities using limited public transport options or at considerable personal expense.

We've got a metro regional bus service that runs around the relevant regional centre but there's currently a shortage of drivers so they're often cutting bus services. It's up to the passenger to check the timetable for cancellations, which relies on the person having a smart device, data and reception or you can miss your appointment with the job service provider. Similarly, you can't meet your job seeking requirements or get to a job interview. You may have to wait four hours for the next bus.

– Regional Tasmania

Digital, phone and face-to-face servicing issues are covered in greater detail in [Social Security for Women Outside Our Cities: Service Delivery Barriers](#).

Lack of training opportunities

Women in 4R areas often have limited or no access to training to increase their employment prospects.

Often it's, "Could you help me find training?"

— Regional Queensland

Where people do undertake training as part of their mutual obligations, travel can be onerous. Some, particularly those in remote areas, are unable to travel.

A lot of them can't go away for training. A lot have big families or there's nowhere to put your kids if you need to go away for a week's training. They don't have Registered Training Officers out here.

— Very remote Northern Territory

We can't find jobs for people in remote communities, but these people work remotely. Why don't we go out there and train people? ... Trades and customer service and how to do maintenance and carpentry and repairs or refrigerator mechanics but teach them in the community.

— National

The scarcity of training options reinforces a skills mismatch between those seeking work and those looking for work that compounds the problem of unemployment in 4R communities.

Failure to recognise family, social and cultural responsibilities

Childcare infrastructure poses a particular challenge for many women with children in their care who want to increase their paid employment but retain primary child-raising responsibility. Many communities lack formal childcare centres or have childcare centres operating with reduced hours and long waitlists.²¹ That restricts women's capacity to actively look for work and to start working.

Many communities lack formal childcare centres or have childcare centres operating with reduced hours and long waitlists. That restricts women's capacity to actively look for work and to start working

Clients without family support often report that it is a struggle to coordinate appointments around school hours or to schedule telephone appointments where they don't need to have alternative care arranged for the children.

— Regional Tasmania

²¹ Mitchell Institute and Victoria University (2022). [Childcare deserts & oases: How accessible is childcare in Australia](#).

In many households, women bear the administrative burden for themselves and their family members, including claiming and having to regularly interact with Services Australia to retain payments.

Predominantly it's the woman in the Aboriginal family who rings up and identifies the problem and predominantly the woman seems to be the money manager ... Anything that sort of revolves around keeping the roof over their head is more likely to be something that's fallen into the woman's purview.

— National

I find that women come in and try and do [things] for their husbands. They'll come in and say, "Can I report for my husband?", because [of] their husband's shame. Or they'll come in and do the claims for them.

— Remote New South Wales

Perhaps women are a bit more comfortable to present because they're usually responsible for a broader family group. Maybe they're presenting for help because they're actually trying to assist other people as well. So, it's not just necessarily an individual issue. So improved finances for them is probably meaning that children are eating better or someone they're caring for is being better cared for, that sort of thing.

— Very remote Northern Territory

Most of the time these women are paying the rent. None of these men that [have] all these children pay for any rent.

— National

The mutual obligations system can be a poor fit for First Nations women who have traditional caring responsibilities and community obligations, which are often viewed as barriers to employment rather than valuable social contributions. This disconnect creates significant tensions for women trying to balance cultural responsibilities with mutual obligation requirements.

There's nothing that counts to their cultural obligation. They might be looking after an aunt or an uncle that's disabled and lives at home ... They're very, like, "You're that old generation so I care for you because you're my grandmother or whatever. You don't need to pay me."

— Very remote Northern Territory

Mum is receiving [Family Tax Benefit] and Jobseeker, but looking after all these other people, like aunty who is eligible for Age Pension but isn't receiving it ... In [some communities], one person is cooking for the whole neighbourhood.

— Statewide Queensland

The mutual obligations system can be a poor fit for First Nations women who have traditional caring responsibilities and community obligations, which are often viewed as barriers to employment rather than valuable social contributions

This issue is outlined further in Chapter 1: ‘Women who are parents and guardians’, including EJA’s recommendation that the Federal Government undertake legislative and policy reform to remove compulsory mutual obligation requirements from primary carers, replacing them with supportive measures to help find employment, modelled on the rationale that underpins the new voluntary Parents Pathways program.

Recommendation 43: That the Department of Employment and Workplace Relations abolish the Targeted Compliance Framework, including payment suspensions.

Systemic flaws in the mutual obligation system fail to support women into employment

Siloing of administrative responsibility

The siloing of responsibility to three Federal Government departments – Services Australia, the Department of Social Services, and DEWR – creates administrative burdens for Government but also for the more than 900,000 people who are subject to mutual obligations.

For some women, this division of responsibility amongst government departments undermines their capacity to claim and retain their payments. Many find themselves unsure about which agency they should talk to and cannot understand why the person they are talking cannot answer their question or resolve their problem. For example, why can’t a Services Australia worker hear and resolve their complaint about the mutual obligation requirements contained in their job plan? The system creates specific problems, including payment delays, when information does not transfer between systems, contradictory advice is provided by different agencies, people fall through administrative gaps with no clear pathway to resolution, or people are required to repeat themselves to multiple agencies.

This issue is exacerbated by outsourcing of decision-making to third parties, employment service providers, which undertake the day-to-day administration of job plans and associated compliance decisions.

One Aboriginal older fella came here, and he was like, “Do you mob know where this office is or where this place is?” And it was like, he just come out of Centrelink and they couldn’t even tell him where that job service provider was.

— Remote Northern Territory

It’s like Centrelink doesn’t talk to the job service providers. I wasted a whole day pretty much going into Centrelink with my client and then they’re telling us, “We know. We got the payments cut,” and the lady is saying to us, “Oh, you need to go to [the employment service provider],” but we just come from [the employment service provider] who told us to go to Centrelink. And I was telling that lady and I said, “We’ve already been there.” And then she just repeats herself again. She’s like, “Oh, but you missed your appointment, so you need to go back to [the employment service provider].” And I’m like, “No, they told us it’s you – and we’re here.”

— Remote Northern Territory

Centrelink didn't provide any information about whether I would need anything for the job plan appointment [with the job search provider], which in the end I didn't because the appointment was a waste of everybody's time. But if I had needed something, I couldn't have gone and gotten anything. Even if you don't require that information, it's probably best to tell people that they're not going to need it.

— Regional Tasmania

They are doing their job in the sense that this is what they're told to do, and at the other end the other provider is told to do that. So, they're actually both doing what they're told to do, and you just get in this loop.

— Remote Northern Territory

The poor interaction between systems appears to be influenced by IT constraints that were designed to create efficiencies and safeguard entitlements but instead create barriers for those seeking help.

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Case study: Carrie

By the time Carrie's claim for JobSeeker Payment was processed, she had already found employment. Eager to do the right thing, she called Services Australia to report her new job and check whether she would still receive JobSeeker for the previous fortnight, knowing her new employer wouldn't pay her for several weeks.

The Services Australia officer's response caught her off guard, explaining that anything related to mutual obligations or reporting employment fell under Workforce Australia's remit, so she would need to contact Workforce Australia instead.

Confused but compliant, Carrie contacted Workforce Australia and explained her situation. She had already accumulated 80 of her required 100 points for the reporting period and had secured a job. The Workforce Australia worker acknowledged her circumstances and noted that while she needed a minimum of four job applications for the period, he could see she had already earned 80 points. He offered to put through an exemption so she wouldn't need to complete additional applications but emphasised that she would still need to report at the end of the period.

When Carrie explained that her job would start within a week and requested a general exemption from ongoing reporting requirements, the officer said he could not do that. Instead, Carrie would need to call at the end of each reporting period to have exemptions applied each time.

Growing frustrated, Carrie asked whether she could simply be removed from the system entirely, knowing she would no longer be entitled to JobSeeker once employed. The officer redirected her back to Services Australia, using language that sounded rehearsed, which she found frustrating as she believed she was trying to have a reasonable and logical conversation. When Carrie pressed on about being manually removed from the system, he explained that payments automatically cease after six weeks of employment and that he could not provide the immediate solution she sought. Carrie expressed her frustration at having to continue reporting twice after starting a new job while ineligible for JobSeeker. There was no solution, so Carrie did as instructed while she waited for her JobSeeker to be cancelled.

Suspension and penalty systems
require reform

The extension of the payment suspension warning period from two to five days has delivered improvements but too many suspensions continue to occur. The table below shows the incidence of payment suspension notifications and payment suspensions for the period January to March 2025, with suspensions applied in almost half of all instances of a warning being issued.

There is no evidence that inflicting financial hardship motivates employment-seeking or boosts employment outcomes.

Table 1: Incidence of payment suspension warnings and actual suspensions - January to March 2025²²

	Workforce Australia Online		Workforce Australia Services	
	Incidents	Clients	Incidents	Clients
Payment suspension avoided	30,005	24,095	142,275	108,860
Payment suspension occurred	25,670	23,800	123,910	100,185
Total	55,675	43,395	266,190	166,335

Payment reductions and cancellations make life very tough for women in 4R areas by undermining financial stability, which then undermines their capacity to maintain employment-seeking activities and find employment. Suspensions affect whole households, as a single family member losing payment means household resources are strained. Notably, there is no evidence that inflicting financial hardship motivates employment-seeking or boosts employment outcomes.

Penalties leading to payment reductions are all too common. Almost 1000 people experienced payment reductions in the first quarter of 2024.²³

22 Department of Social Services (2025). [TCF Public Data – 1 January 2025 to 31 March 2025](#).
23 Significant concerns about the integrity of the Targeted Compliance Framework have resulted in the recent pausing of the entire system. Consequently, the data provided is from the corresponding quarter for 2024. Department of Social Services (2024). [TCF Public Data – 1 January 2024 to 31 March 2024](#).

Table 2: Payment reductions and cancellations, January – March 2024²⁴

Financial Penalties	Number of cases
1st Mutual Obligation Failure – 50 per cent reduction for one fortnight	700
2nd Mutual Obligation Failure – Loss of payment for one fortnight	245
3rd Mutual Obligation Failure – Loss of payment for two fortnights	45
Total Financial Penalties	990

The system can be confounding, and when things go wrong, women are often left with responsibility to identify and resolve the issue, which can be onerous.

We don't have a lot of job providers that are sitting locally to do the phone appointments. They send them an email out saying, "You've got to call us on a particular date" but

then they actually call you. So, clients are confused. Then, there are [issues with] dates and the addresses for where they're meeting. It's usually [particular address] but then sometimes it's here and then sometimes it's down at the old JobLink office and then it [can be] at the youth centre. So clients aren't sure exactly where they're going. They just come to us and say, "When do I report? What do we do?"

– Remote New South Wales

They don't have the money to come and go back. They don't have the energy to come and go back. They don't have the emotional resilience to come and go back.

– National

If the person is unable to resolve the issue, the affects of payment cancellation can be devastating given many people have no savings.

So yeah, people really aren't [coping]. The financial literacy is a problem certainly here. It's a problem everywhere really. But certainly, here it is and people are not planning for a rainy day and that creates a lot of issues.

– Regional Tasmania

Why are we using cutting someone's livelihood as a penalty. We're better than that.

– Statewide Queensland

²⁴ Ibid.

Limited knowledge and skills of many employment service workers

Despite policy allowing for reduced PBAS point targets and the availability of exemptions in certain circumstances, the 'flexibility' of the system is not always felt on the ground. Some

community workers reported their clients had engaged in supportive and productive conversations with their employment service provider, but many had not. Often employment service providers lacked awareness of issues effecting key populations or were rigid in their approach, including being unwilling to apply discretions when doing so would assist the person to manage their commitments, which would in turn maximise their capacity to find and retain employment.

The system can only ever be as effective as those who administer it

Just with the reporting obligations ... there's a lot of reasons you can get exemptions for those, and I've got a few for some of my clients because of homelessness or violence and stuff, but it's not very widely known. There's lots of homeless people out there that don't access the exemptions. They're still trying to go to the job network provider every week.

— Remote Northern Territory

They will have to come to report monthly. That client doesn't even speak English. How do you require them to have a job? They need to be exempted for six months or 12 months or a certain time. If you have a person who doesn't speak English and you put them to work, that is dangerous for the client. Even if a 'safe' job, if they don't understand the contract, don't understand about work rights, don't understand about work safety, it's dangerous.

— Regional Queensland

My client had a referral to a job service provider. She's worked as a jackaroo for 20 years before transitioning to female. She's got this amazing work history ... but it's not a field that's safe or appropriate for her anymore. And you've got this expectation of applying for those sorts of jobs from the job network providers out in the bush.

— Statewide New South Wales

Further investment in recruitment, training and professional development of employment service provider staff is required to improve administration of the employment services system, as the system can only ever be as effective as those who administer it. That includes the need for a shift of focus from compliance to assistance, and greater use of available discretions to assist people where required, noting women in 4R areas often lack a choice of employment service providers.

If they're not meeting their job provider, they're cut off. If they miss the phone appointment, they're cut off.

— Remote New South Wales

I don't think it's women wanting to not engage. It's more women having issues with their service providers, and a lack of options per se, of who they can choose to engage with ... I think it tends to be the job service provider being a for-profit organisation and having their own things that they need to meet versus actually listening.

— Regional Victoria

You get job providers who go, "Well, it's not my job", so you do wonder. And I feel a bit for some of the staff because they get the same questions and they get hassled by people ... who give staff a hard time. But is that through lack of knowledge, lack of understanding, frustration? All of the above probably. And the people behind the desk, I'm sure get really tired of it, but they just make it hard for people.

— Remote Northern Territory

People feel like they don't have the array of different services so that they can choose one they're comfortable with. They kind of have to go with the only one. And the further out you go, those services might not even exist. They have less choice.

— Regional Victoria

Many women in 4R areas report receiving confusing, contradictory and/or inflexible guidance from employment service providers, which undermines their capacity to meet obligations and secure employment.

Poor communication of mutual obligation requirements

In order to comply with mutual obligation requirements, women need clear and complete information outlining exactly what their mutual obligations are. Many women in 4R areas report receiving confusing, contradictory and/or inflexible guidance from employment service providers, which undermines their capacity to meet obligations and secure employment. That includes forcing women to choose between compliance and genuine job opportunities. Employment service providers also fail to explain the flexibility that exists within the system or communicate requirements in ways that accommodate individual circumstances.

We had one lady at the refuge who would have to present to the local art place and she had to be there till one o'clock every day. She was adamant she had to go there between 8:30 and one o'clock every day.

She was also applying for part-time jobs but if they said, "You have an interview for the job you applied for at 10am", she would think she couldn't attend because she was told by her employment service provider that she needed to be at the art centre from 8.30am to 1pm each day. No leniency.

She told us, "I'm not going to my interview because there's a good chance I might get the job but I'll get my payment cut for eight weeks so will have no money while I wait for my pay."

— Very remote Northern Territory

Further improvements required to provide access to administrative justice

While improvements to complaints processes have been made (see page 68, above). More needs to be done to ensure those subject to mutual obligations are aware of, and have access to, mechanisms to resolve grievances about employment services.²⁵ Many women

in 4R areas are unaware of their right to review employment service decisions or face practical barriers to exercising these rights.

The division of responsibilities between DEWR, Services Australia, and employment service providers creates uncertainty for jobseekers about how to address an unfair or incorrect employment service provider decision. That includes knowing if and where to lodge a complaint, which is often the primary mechanism through which people access information about their rights and then seek remedy for an unfair or incorrect decision. The current complaints framework falls short of genuine protections required under administrative law, which requires transparency regarding reasons for a decision and provision of those reasons in writing. For women with compounding accessibility needs – including those with disabilities, First Nations women, women with limited English proficiency, and those experiencing family violence – the barriers to administrative justice can be insurmountable. The result is a system where harsh and incorrect decisions affecting people's livelihoods are not challenged.

Recent changes have improved the employment services complaints process so that a complaint is no longer referred back to the employment service provider employee who made the original decision. Instead, queried decisions are considered by a DEWR officer. Unfortunately, the new process is not widely known or understood and participants continue to feel vulnerable to retaliation from employment services providers who control their ongoing obligations and make recommendations that trigger payment suspensions.

Responsibility for monitoring the efficacy and fairness of employment service providers' decisions should not rest with individuals. Notably, the TCF's complaints system has failed to provide a window to government to allow monitoring of the (fair) operation of service delivery. Given minimal monitoring and reporting of data, the current system lacks accountability.²⁶

The division of responsibilities between DEWR, Services Australia, and employment service providers creates uncertainty for jobseekers about how to address an unfair or incorrect employment service provider decision

Recommendation 44: That the Department of Employment and Workforce Relations build on recent reforms to embed an adequate administrative review system and ensure employment services participants receive protections under social security law.

25 Economic Justice Australia (2025). [EJA response to DEWR discussion paper on employment services complaints service](#).

26 Economic Justice Australia (2024). [EJA briefing: Merits review of mutual obligation decisions](#).

Poor responsiveness during natural disasters and extreme heat

The inflexibility of the mutual obligation system in response to natural disasters and extreme weather events is problematic as the standard four-week mutual obligations pause for designated Local Government Areas following an event is often inadequate. During and after natural disasters, entire communities lose essential infrastructure including roads, telecommunications, public transport, and employment services offices. Housing may be damaged or destroyed, families displaced, and local economies disrupted for months. The burden to manage mutual obligations falls on (sometimes traumatised) people who are required to request temporary exemption extensions, often while still lacking access to phones, internet, or transport to contact the relevant agency. This places additional stress on people dealing with loss, displacement and community-wide disruption.

Climate change is increasing the frequency and intensity of extreme heat and other weather events, particularly in many 4R regions where undertaking job plan activities can become genuinely dangerous. Expecting people to travel long distances for appointments, attend outdoor activities, or conduct job searches during extreme heat events reflects a lag in the system's capacity to respond to climate realities.

Current discretion to extend a mutual obligations pause is constrained by rigid definitions of 'reasonable excuse' that do not reflect the lived experience of natural disasters or the practicalities of extreme weather. Decision-makers require broader authority to respond appropriately to climate and disaster impacts including extreme heat.

Expecting people to travel long distances for appointments, attend outdoor activities, or conduct job searches during extreme heat events reflects a lag in the system's capacity to respond to climate realities

Recommendation 45: That the Department of Employment and Workplace Relations amend the *Social Security (Administration) (Reasonable Excuse Participation Payments) Determination 2018* to specify that extreme weather events or the lasting effects of natural disasters can be a 'reasonable excuse' for failing mutual obligations requirements.

Recommendation 46: That the Department of Employment and Workplace Relations apply mutual obligation pauses during heatwaves and other extreme weather events.

The case for comprehensive system reform

Despite enormous administrative costs, compulsory mutual obligations requirements deliver minimal if any employment outcomes.²⁷

For many, they operate as a barrier to training and genuine job seeking, as people spend time doing tick-box tasks (e.g. 20 job applications – of whatever quality – a month) that do not increase the likelihood of employment. The system is fundamentally unsuited to 4R realities, failing to effectively account for limited job markets, geographic challenges, and community circumstances. Administrative complexity creates confusion and gaps in service delivery across multiple agencies. Penalties applied to those who are unable to fulfil their mutual obligations undermine income security with significant flow-on effects.

The substantial public resources spent administering the mutual obligations framework, particularly the TCF, would be more effectively spent if redirected toward evidence-based employment services that support women into jobs. Genuine support would provide personalised assistance based on participants' circumstances and goals, respect for participants' dignity and understanding of their specific situation, and measurement of success through sustainable employment outcomes.

EJA supports abolition of the TCF and a shift towards evidence-based policy on employment services that genuinely assist people into employment.²⁸

The system is fundamentally unsuited to 4R realities, failing to effectively account for limited job markets, geographic challenges, and community circumstances

Genuine support would provide personalised assistance based on participants' circumstances and goals, respect for participants' dignity and understanding of their specific situation

Recommendation 47: That the Federal Government increase efforts to guarantee:

- A rights-based approach to social security
- Evidence-based interventions that provide real pathways to employment
- Genuine, supportive employment services that are sufficiently resourced to help people find work
- Policies that respect people's dignity.

Recommendation 48: That the Federal Government prioritise development of a non-punitive approach to employment services participation in consultation with people directly affected by the system, peak bodies and experts, allowing decision-makers to consider the full set of circumstances informing a person's capacity to comply.

27. The Select Committee on Workforce Australia Employment Services (November 2023). [Rebuilding Employment Services](#).

28. Economic Justice Australia (2025). [Economic Justice Australia Policy Statement on Mutual Obligations](#).

Young women

I can confidently say everybody that's in [our youth homelessness] shelter right now, their parents earn too much for them to gain Centrelink to be in their own accommodation. So, they're homeless ... but we can't house them in [transitional accommodation] because they can't go on the Department of Housing list because their parents earn too much to be on Centrelink, so they're going to remain homeless.

- Regional Queensland



Key findings

- Youth payment rates are inadequate to cover basic living costs, particularly in regional, rural, remote and very remote (4R) areas where young women face higher expenses.
- The age of 'independence', currently set at 22, is too high and does not reflect contemporary social realities, locking young women out of payments or leaving them on lower 'dependent' payment rates despite living independently.
- Independence pathways, such as the 'Unreasonable to Live at Home' assessment, are vital – but complex policy guidelines and assessment processes create barriers, including for young women experiencing family or domestic violence.
- The binary nature of Youth Allowance (student) and Youth Allowance (other) creates a disincentive to tertiary study for young women who cannot earn enough to meet expenses while maintaining a full-time study load.
- Young women leaving out-of-home care can fall through jurisdictional gaps between Commonwealth and state systems, resulting in delays, confusion, and inappropriate debt recovery during critical periods of transition.
- Parental means test thresholds have been outpaced by living costs, creating genuine financial hardship for middle-income families, at times resulting in young women giving up on study, living in unsafe situations or experiencing homelessness.

How does the system work?

Australia's social security system operates on the assumption that young people under 22 years of age are financially supported by their families, with most payments ostensibly providing supplementary assistance rather than primary income support. This framework shapes eligibility criteria, payment rates, income testing, and independence assessments across youth payments, creating a complex web of means testing and age-based thresholds that directly impact young women's ability to secure basic financial security and wellbeing, and complete secondary and further education.

Youth Allowance

Youth Allowance forms the backbone of youth-targeted income support. As at March 2025, 241,235 people were receiving Youth Allowance, 133,850 of whom were women or girls.¹

Youth Allowance is best described as two distinct payments: Youth Allowance (student) and Youth Allowance (other). Each has specific eligibility criteria, claim requirements, income testing and rates. A person can only be eligible for one or the other.

¹ Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

- **Youth Allowance (student)** provides income support to young people aged 16 to 24 years who are undertaking full-time study, doing an “Australian apprenticeship”, or temporarily unable to study due to illness or other circumstances. Students must maintain at least 75 per cent of the equivalent full-time study load for an approved course to remain eligible. Youth Allowance (student) means testing includes a parental income test if the applicant is under 22 years of age or deemed ‘dependent’.

As at March 2025, there were 142,765 Youth Allowance (student) recipients.² Around one quarter of those recipients lived in regional, rural, remote or very remote (4R) areas: approximately 26 per cent regional/rural and 1 per cent remote/very remote.³ Women comprised 60 per cent of all recipients (85,135).⁴

The number of people receiving Youth Allowance (student) has declined steeply, from approximately 220,000 Youth Allowance recipients in 2015⁵ and 275,000 in 2005.⁶ The decline coincides with increasing university participation rates, but also more onerous Higher Education Contribution Scheme (HECS) obligations and rising cost-of-living pressures.

- **Youth Allowance (other)** provides income support for young people aged 16 to 21 years who are seeking employment, preparing for work, or temporarily unable to work due to illness or injury, and those employed or studying full-time who are unable to undertake work or study due to a medical condition, illness or injury who have a job or study to return to. Similar to JobSeeker Payment, recipients must complete mutual obligations requirements intended to support them into employment. Failure to satisfy mutual obligations can result in payment suspension, reduction or cancellation. (For more on mutual obligations see chapter 4, Working-Age Payments).

As at March 2025, there were 98,470 Youth Allowance (other) recipients.⁷ Almost 60 per cent of those lived in 4R areas: approximately 48 per cent regional/rural and 10 per cent remote/very remote.⁸ Women comprised just under 50 per cent of all recipients (48,718).⁹

² Ibid.

³ Data derived by applying Modified Monash Model to LGA disaggregated data in Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

⁴ Ibid.

⁵ Department of Social Services (2015). [DSS Demographics March 2015](#).

⁶ Australian Bureau of Statistics (2006). [Year Book Australia, 2006](#); Medhora, S. (2025, 1 July). [Number of students on Youth Allowance drops significantly in 20 years](#). ABC News.

⁷ Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

⁸ Data derived by applying Modified Monash Model to LGA disaggregated data in Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

⁹ Ibid.

The importance of dependence and independence

The system's core assumption of family support relies on a two-tiered structure.

• Dependent

The rate of Youth Allowance for a person considered 'dependent' is lower than for a person considered 'independent', with the rate of payment also linked to whether a person lives at home with their parents or not. There is also a parental means test, unless their parent is in receipt of an income support payment, applying even when the young person is living independently and receiving no family financial support.¹⁰ Payment rates are based on the assumption that parents with annual income exceeding the parental income threshold can and will contribute to the young person's support. Annual parental income in excess of \$65,189 reduces Youth Allowance by 20 cents for every dollar. A complex system of 'pooling' applies when Youth Allowance or Family Tax Benefit (FTB) eligibility applies to more than one dependent child/person.

• Independent

Those assessed as 'independent' are eligible for higher rates of Youth Allowance, and the parental income test does not apply. There are several pathways to independence. The *Social Security Act* prescribes that a young person may be considered 'permanently independent' if they:

- are, or have been, married or in a registered relationship
- are, or have been, in a de facto relationship for a continuous period of 12 months (or in special circumstances, six months)
- have, or have had, a dependent child
- have previously worked an average of 30 hours a week for at least 18 months within any two-year period
- are aged 22 years or older.

A young person may also satisfy 'reviewable independence' criteria if:

- their parents cannot exercise their parental responsibilities
- they are a refugee or orphan
- they are in State care, including foster care (*explained further below*)
- it is unreasonable for them to live at home (*explained further below*)
- they have a partial capacity to work (*jobseekers only*)
- they are disadvantaged.¹¹

¹⁰ Note the parental income test does not apply to people receiving DSP.

¹¹ Young people aged 15 years of age who meet one of the above reasons for independence can be paid Youth Allowance if they are also over the minimum school leaving age in their state or territory in which they live or have formal exemption from attending school if they are under the minimum age.

If reviewable independence criteria apply, the young person is required to notify Services Australia if their circumstances change, and they may be reassessed as 'dependent'.

A young person whose parent/guardian's home is in a regional, rural, remote or very remote (4R) area may also be considered independent under 'concessional workforce independence criteria'¹² if they needed to move away to study, and they have worked and been paid at least 75 per cent of the National Training Wage (approximately \$30,000) in any 14-month period since leaving school, or at least 15 hours per week for two years since completing secondary education. Under this system, family income remains relevant, rendering young people ineligible when family income exceeds \$160,000, with an additional \$10,000 added per dependent child.

Other social security payments

ABSTUDY is available to First Nations students studying at secondary, tertiary or master's level (regardless of age). Components include both a fortnightly living allowance payment and supplementary payments supporting travel, accommodation, tuition fees, incidentals and more. ABSTUDY is designed to address practical barriers such as geographic isolation and the need to maintain cultural connections while studying. As at March 2025, there were 4820 ABSTUDY Living Allowance recipients aged 16 to 24 years, and 2875 people aged 16 to 24 years receiving supplementary ABSTUDY payments.¹³

Disability Support Pension (DSP) is the primary income support payment targeting people with disability or chronic health conditions. A person must generally have a medical condition that attracts 20 points or more under legislatively prescribed Impairment Tables, and a 'continuing inability to work' 15 or more hours per week, with the condition likely to last at least two years, unless terminal. Specific rates and criteria to determine independence apply. As at March 2025, there were 62,095 DSP recipients aged 16 to 24 years.¹⁴

¹² *Social Security Guide*, section 3.2.5.85

¹³ Department of Social Services (2025). [Expanded DSS Benefit and Payment Recipient Demographics – March 2025](#).

¹⁴ Ibid.

Special Benefit can be paid to some young people who fall outside standard payment categories, often due to complex issues relating to migration status, age restrictions, or sometimes jurisdictional gaps between Commonwealth and state/territory responsibilities for unsupported children younger than 18 years old. Special Benefit is paid to a small number of young people who are not eligible for any other income support payment, are in severe financial hardship, and cannot earn a sufficient income for reasons “beyond [their] control” (*Social Security Guide*, section 3.7.2.20). It has a particularly harsh income test, with recipients losing \$1 of Special Benefit for every \$1 gross income they earn, and additional reductions if the person is receiving other support – including food, accommodation, utilities and other goods and services. In March 2025, there were 280 Special Benefit recipients aged 16 to 24 years.¹⁵

Supplementary payments

Smaller supplementary payments are available in some instances, including:

- **Tertiary Access Payment**, a one-off payment of \$3000 or \$5000 to assist eligible students from 4R areas with the cost of moving for tertiary study after finishing Year 12 or equivalent. Students do not need to be eligible for income support, although a parental income test applies.
- **Relocation Scholarship**, an annual scholarship for higher education students who are full-time students receiving Youth Allowance or ABSTUDY Living Allowance and need to move from or to a regional or remote area to study. The Relocation Scholarship is paid at \$5590 for the first year and between \$1396 – \$2795 for following years.
- **Pensioner Education Supplement**, a supplementary fortnightly payment to eligible income support recipients to help with the ongoing costs associated with study (noting many people with a disability or chronic illness are studying, including some who are still at high school). It is paid at \$62.40 per fortnight if a study load of 50 per cent full time or more, and \$31.20 per fortnight if a study load of less than 50 per cent full-time.
- **Education Entry Payment**, an annual payment of \$208 to some eligible support recipients to assist with upfront costs of tertiary education and training.
- **Youth Disability Supplement**, a supplementary fortnightly payment to eligible income support recipients to help young people meet the extra costs of living with a disability. Paid to recipients of DSP and also Youth Allowance and ABSTUDY if aged under 22 and assessed as having a partial capacity to work.
- **Approved Program of Work Supplement**, a supplementary payment of \$20.80 per fortnight to eligible income support recipients to assist with the costs of participating in an approved program of work (for example, Work for the Dole).

¹⁵ Ibid.

- **Language, Literacy and Numeracy Supplement**, a supplementary payment to eligible income support recipients to assist with the costs of participating in the Skills for Education and Employment program for at least one day per fortnight. Young people may also be supported indirectly through Family Tax Benefit paid to parents or guardians. This chapter focuses on young women as claimants and recipients of Youth Allowance (student) and Youth Allowance (other).

What is working well?

Young people's preference for digital engagement

Service providers report that digital platforms have become an increasingly important means for young people to interact with the social security system, with many showing a strong preference for digital engagement over in-person and phone interactions. Digital services allow young people to engage on their own terms and schedule, which can be particularly important for young people juggling study, work and other commitments. When these systems work well, they provide efficient and accessible pathways for young people to manage their payments.

Introduction of payment for students doing 'prac' placements

The July 2025 introduction of the Commonwealth Prac Payment is a significant change, providing much-needed support to students during mandatory work placements. The payment acknowledges the financial strain unpaid placements can place on students, particularly those with limited or no family financial support, given many students cannot work in their regular jobs during intensive placement periods. The \$319.50 per week means-tested payment is available to teaching, nursing, and social work students doing unpaid work placements.

Outreach to schools

The presence of Centrelink outreach officers in targeted locations (such as secondary schools) has proven an effective measure to help young women navigate the social security system.

We've experienced and heard about outreach officers going out to schools from Centrelink to help those young women fill out their Youth Allowance forms ... That's amazing.

If [only] that was resourced ... I think there's a lot to be said for social workers and their scope within Centrelink. But now we only have one social worker across both offices [in our area] ... because of funding.

— Regional Victoria

Centrelink outreach workers, social workers I think, used to go to schools, meet with young people, do the forms do the form filling, know exactly what they needed from the young person to get over some of those hindrances better than I would because they know how to process it on the system. I think that lack of resourcing now is massive.

— Regional Victoria

The provision of direct assistance with social security matters - including completing forms, communicating eligibility requirements, and navigating the often-complicated claim process - circumvents the need for young people to navigate complex systems alone. Unfortunately, Services Australia's resource constraints limit the coverage and consistency of outreach services across different regions, particularly in remote and very remote Australia.

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What needs to change?

Youth payment rates inadequate and many young women cannot afford necessities

Young women in 4R Australia are financially struggling – disadvantaged by the combined impact of low Youth Allowance rates, low youth wages, limited study and employment opportunities, and the heightened cost of living in 4R areas.

The maximum rate of Youth Allowance payable to an ‘independent’ single person who is younger than 22 years old, without dependent children, and living separately from their parents is \$663.30 per fortnight. That is \$47 per day: less than the JobSeeker rate of \$56 per day, and well below the pension rate of \$75 per day (or \$82 per day once pension-eligible supplements are added). Many young people receive less after being assessed as dependent. As of July 2025, the payment rates for Youth Allowance are as follows:¹⁶

Table 1: Youth Allowance rates (single, no children)¹⁷

Age	Circumstances	Basic rate per fortnight
Younger than 18 years old	Living at parent’s home	\$410.30
	Living away from parent’s home to study, train or look for work, and assessed as independent	\$663.30
18 to 22 years old	Living at parent’s home	\$472.50
	Living away from parent’s home and assessed as independent	\$663.30

16 Different rates apply to DSP. The maximum rate of payment for a single person considered dependent who is younger than 18 years of age is \$569.60 per fortnight, while the maximum rate for a dependent single person aged 18 to 20 years is \$631.80 per fortnight. The maximum rate for a young person considered independent until they reach 21 years is \$822.60 per fortnight, with the maximum rate increasing to \$1051.30 at age 21 (or \$1149.00 once Pension Supplement and Energy Supplement are added).

17 Services Australia (2025). [How much you can get](#). Note, these rates do not include the Energy Supplement which is paid fortnightly and ranges from \$3.90 to \$12.00 per fortnight.

Service providers across 4R Australia describe financial hardship impacting the health and wellbeing of young women receiving youth payments, often while juggling heavy study and work commitments.

The discrepancy between Youth Allowance and JobSeeker rates makes no sense. What magically changes when a person turns 22?

– Statewide Queensland

Everyone knows that the Centrelink amount isn't even at the poverty line ... And the cost in rural and remote areas, things are more expensive. How do you get access to the same things ... or transport really long distance for petrol and cars?

– Very remote Northern Territory

I have a client who can't take their dog to the vet because she can't afford vet bills and she's just living in crisis mode week to week and not being able to plan ahead for anything ... You're under financial stress every day. It's a really horrific way to live.

– Statewide New South Wales

While the 2023-24 Federal Budget increased the base rate of Youth Allowance by \$40 per fortnight, the increase was not sufficient to ensure young women in 4R areas can afford rent, utilities, food, medicine, transport and digital connectivity. According to Anglicare's 2025 *Rental Snapshot*, there are no affordable rentals nationwide for a person receiving Youth Allowance, even when combined with Rent Assistance.¹⁸ The housing affordability crisis particularly affects young women in 4R communities given they have fewer housing options and face higher costs for basic necessities.

There are no affordable rentals nationwide for a person receiving Youth Allowance, even when combined with Rent Assistance

¹⁸ Anglicare Australia (2025). [Rental Affordability Snapshot: National Report 2025](#).

Case study – Cassie

Cassie grew up on her parents' farm in rural Australia, three hours from the nearest city. While Cassie was at school she loved acting, starring in her small town's community productions throughout her teenage years. Her talent and academic excellence earned her acceptance into a prestigious university arts program in her state's capital city; a course that required not only top marks but success in a rigorous and competitive audition process.

Moving to the city meant leaving behind all her support systems. Cassie found accommodation in a sharehouse near the university but quickly discovered that her course demanded far more than traditional study. Beyond exams and assignments, she had time-intensive practical training and rehearsals, demanding assessments, and the expectation that she would intern and volunteer with theatre and arts organisations while maintaining her full-time study load.

Cassie had taken a break between high school and uni to work at the local café in her rural town. This allowed her to meet the self-sufficiency criteria for regional students and receive the independent rate of Youth Allowance. Even with this higher rate, Youth Allowance covered only a fraction of her living expenses. To make ends meet, Cassie took casual shifts at a fast-food restaurant.

Cassie's weekly routine became a relentless cycle of full-time university classes, unpaid internship hours at a theatre company, and casual work shifts that stretched into weekends, often surpassing 60 hours per week. The physical and emotional toll mounted, and Cassie found herself unable to visit her family, as she needed every weekend shift to cover her rent. Struggling with anxiety and exhaustion, Cassie collapsed during a shift at the fast-food restaurant.

Cassie felt trapped. Her parents, struggling financially on the farm, had no savings or spare money to send her. They wanted to help but were barely making ends meet. The isolation from family support, combined with the impossible juggling act of study, work, and unpaid placements, pushed Cassie into a mental health crisis that culminated in an attempt on her own life.

Unable to continue her studies, Cassie's parents brought her home to the family farm to recover. In the chaos of her mental health crisis, administrative requirements fell by the wayside. She failed to notify Centrelink that she had stopped studying, creating a substantial debt. She also missed the university's census date for course withdrawal, leaving her with a significant HECS debt and no qualification to show for her efforts.

Service providers pointed to the urgent need to increase youth payment rates.

We know that our social security system is failing young people when there is no rental property in Australia which a Youth Allowance recipient could afford to live in without additional income. There are a set of assumptions about young people which appear to be 'baked into' the legislation and policy: that young people are supported financially by their parents; that a young person who moves in with their employed partner will receive financial support from that partner – never mind how long they have been together; that young people have the capacity to manage paid work on top of full-time studies to fully financially support themselves. Our clients' experiences are devastating evidence of the harm that result from a system that operates on the basis of such assumptions.

– Statewide Queensland

We saw from COVID, when JobSeeker was doubled, we can relieve financial distress – significantly, straight away, just by that measure. And it's really frustrating working in this space and knowing that we could do that. And we don't do that. It's just incredibly soul destroying when you do see every day the poverty that people live in.

– Very remote Northern Territory

Workers also noted the need to increase Remote Area Allowance, which has not increased for over 20 years.

Significantly raise the rate for people, and maybe that should be not only raised, but [also] considered where we acknowledge that food and petrol and general living is a lot more expensive in these places, so as a result of that, we're going to give you a percentage more money.

– Remote Northern Territory

For more on Remote Area Allowance, see [Social Security for Women Outside Our Cities: Service Delivery Barriers](#), p42.

System difficult to navigate

Many young women are not used to dealing with government systems, their only prior exposure being the very scaffolded experience of primary and secondary schooling. The social security system is complex and can be overwhelming.

At worst, young women find social security requirements so formidable that, despite being eligible for income support, they abandon the system altogether

Centrelink forms and processes can be challenging for any person unfamiliar with the system, particularly a teenager who has never applied for anything before who is applying for Youth Allowance because they have no other options. The complexity involved in the process of accessing and maintaining a payment can be a significant deterrent and stressor for young women.

– Statewide Queensland

At worst, young women find social security requirements so formidable that, despite being eligible for income support, they abandon the system altogether.

We have a lot of young women tell us, "It's just a too hard basket". You hit a hurdle then no one can tell you what you need to do or why a decision was made. Amongst everything else happening in their lives, it becomes easier to go entirely without and make do without a payment as that's easier than trying to navigate the system. The impact on them is monumental.

— Regional Victoria

So, she's not getting [payments], because she's got a debt and she's been cut off ... We've had two young people that have had quite severe mental health issues. They've got no money.

— Regional Queensland

Once young women obtain payment, they may struggle with ongoing reporting requirements.

Most young women need explanations and answers in a way that they understand. Mostly they seek someone to take the time and listen and work with them to resolve issues.

— Regional Victoria

I've literally sat with this young person because once she got her Youth Payment, she had to report her income and the period of time that she has to report is different to what a pay period is ... I literally sat with her on a Saturday and we made a spreadsheet [so she could understand].

— Regional Queensland

Income reporting has been simplified by Single Touch Payroll (STP) which enables the pre-filling of employment income by Services Australia, although community workers report that many young women still find their income reporting obligations confusing, including confirming that STP pre-filled information is correct. This is particularly the case where casual work hours fluctuate and/or reporting periods don't align with pay periods. This issue is significant because if a young woman 'accepts' or 'approves' erroneous information provided through STP, a social security debt may result; a debt recovered via withholdings from income support payments that are already stretched to the limit. Although debt recovery can be paused or relaxed, many young people are not familiar or confident with internal review processes so won't pursue an appeal.

While young women often prefer digital systems, face-to-face support options remain critical, including for young women in 4R areas where digital access is not an option. Patient, empathetic and understanding engagement with Centrelink staff can be the difference between accessing correct entitlements and not.

‘Independence’ criteria creates genuine hardship

The assumption that a young person will remain financially dependent on their parents until age 22 fails to reflect the reality that many young people stop being dependent, or are unable to depend, on their parents/guardians much earlier. This disconnect between policy assumptions and lived experience creates hardship for young women locked out of Youth Allowance by parents/guardian’s income or reliant on low payment rates designed for those receiving family support.

The independence framework can be even more complex for First Nations young people from non-Anglo/European nuclear families. While those who are studying or undertaking an apprenticeship may be eligible for ABSTUDY, others remain subject to Youth Allowance rates and dependent/independent criteria.

Service providers in the Northern Territory highlight the unique circumstances of young people living in collectivist communities with multi-generational housing arrangements, where the concept of ‘moving out’ to establish independence simply does not exist. Young women in these communities may never move out of the family home, continuing to live in overcrowded conditions. Low payment rates result in an inability to contribute to the household, which adds stress on already financially strained extended family networks.

The assumption that a young person will remain financially dependent on their parents until age 22 fails to reflect the reality that many young people stop being dependent, or are unable to depend, on their parents/guardians much earlier

Most of our clients are living multi-generationally - maybe forever. So, people are not actually moving out and becoming ‘independent’. It’s grandma and five cousins and everything else. In effect, what it’s doing is reducing the household’s income. There’s so much money transfer and sharing of responsibility around. Like food - if there’s money in the household, it’s just sort of expected that you’ll buy something for this person, and they might buy you something later on. There’s just sort of a pool, so it’s almost like it’s communal money. It’s household money.

— Remote Northern Territory

Most of our clients live in a state of dire poverty because a majority of them are on Centrelink payments and it’s just simply not enough to live on. People are just constantly looking for money.

— Very remote Northern Territory

Youth Allowance criteria and rates can mean that young women in remote areas face a double disadvantage where they cannot access independent payment rates through pathways like moving out of home, yet their family is unable to provide financial support given the economic realities of the household, which may be the family living in poverty. The result is a system that fails to provide adequate support, imposing unrealistic expectations based on metro-normative, nuclear family models that do not reflect the diversity of 4R communities.

Lack of awareness of reviewable independence pathways

Many young women and frontline service providers lack knowledge of independence provisions that may allow a young person to be considered independent before age 22. Community workers report that a lack of awareness about, or resistance to apply, independent pathways criteria is also apparent among some Services Australia staff. In fact, advocates reported that it is not unusual for Centrelink customer service officers to lack

knowledge of specific legal and policy provisions underpinning Youth Allowance, leading to the dissemination of incorrect information. This misinformation can cause individuals to mistakenly believe they are ineligible for certain benefits.

Advocates reported that it is not unusual for Centrelink customer service officers to lack knowledge of specific legal and policy provisions underpinning Youth Allowance, leading to the dissemination of incorrect information

The independence provisions only work if vulnerable young people know they exist. A young woman approaching Centrelink for the first time is likely to be highly reliant on Services Australia staff to let her know about all of the options available to her. Is it really reasonable to expect she'll have the knowledge, resources and experience to persist if told she is told she is ineligible simply because she is under 22? It's vital that frontline Services Australia staff are well equipped to identify where a young person may be 'independent' despite being under 22.

— Statewide Queensland

Well, some of the workers [at Centrelink] ... don't understand about that stuff and that can be a bit frustrating. I've got a young person, she got on Youth Allowance, and we chased up the paperwork from [child protection government agency] to prove that she was a 'child in care' and it turns out she's entitled to ... independence rate.

— Remote Northern Territory

We rely heavily on community workers to refer clients into our service for legal help with their social security problem, so unless they are aware that the review of a Centrelink decision is a legal matter, clients that need us most may never reach us. Youth Allowance and independence is such a niche area, that many, including both community workers and Centrelink phone operators, don't understand the nuances or options available for accessing these payments.

— Regional Victoria

One of my young clients only learned that their particular circumstances meant they should ask to be treated as 'independent' by Centrelink when she sought legal advice from us.

— Statewide Queensland

Parental means test does not reflect cost-of-living increases

As outlined above, a young person younger than 22 years old may be considered independent for Youth Allowance (student) purposes under concessional workforce independence criteria if they have moved from a 4R area to study full-time, and since leaving school they have earned 75 per cent of the National Training Wage in any 14-month period, or worked at least 15 hours per week for at least two consecutive years. Unlike other independence provisions – including those based on work history – a parental income test applies where these criteria are met, including where the young person demonstrably receives no financial support from their parents.¹⁹ The young person will be deemed ineligible for Youth Allowance if their parents' combined income is over the threshold of \$160,000 per annum, with an additional \$10,000 added to the 'Family Unit Regional parental income threshold' for each dependent child (with parents able to use income from the most recent three financial years most beneficial to their assessment).

Some young people decide not to pursue tertiary education, while others commence study, then return home because they find it too difficult to survive

Service providers described the effect of these provisions on young people, observing that some young people decide not to pursue tertiary education, while others commence study, then return home because they find it too difficult to survive. Others leave home, only to find themselves unable to secure safe accommodation.

For the first time, we are seeing an increase in requests for services from areas that would not ordinarily access our services due to being socio-economically higher up the chain. Increased mortgage rates, rental rates, cost of food, etc., in an area where options are limited, is meaning more of the community that would previously not have experienced financial hardship are now experiencing it. This significantly affects parents' ability to support their children.

— Regional Victoria

Parental income tests operate without regard to household costs, including whether parents are paying substantial rent or mortgage repayments on the family home, supporting other adult children and/or facing increased costs associated with 4R living, including higher fuel, groceries, and utility expenses. Even when some families may be able to afford to provide some financial support, many will choose not to, including when the cost to the family as a whole is too great.

The Family Unit Regional parental income threshold is a disincentive for young people to pursue education which could lead to employment and a higher standard of living.²⁰ The threshold should be increased, with regard to rising cost-of-living pressures generally, and for young people in 4R areas in particular.

19 If a young person's parent/s receive an income support payment, Farm Household Support Payment, or ABSTUDY they are exempt from the parental income test.

20 Note the parental income test threshold does not apply to a young person on Disability Support Pension in any circumstances.

The concessional workforce independence criteria for regional students is also problematic because it sets the work period for earnings at 75 per cent of the National Training Wage over a 14-month period. The period of 14 months requires that students find a job within a heavily casualised workforce that provides enough hours while completing Year 12 assessment, commence work almost immediately, and complete work just before moving to a new location to commence study. While theoretically feasible it is unworkable for many, including knowing about the provisions and then a confluence of factors that would allow the young person to be able to start employment in time to complete 14 months before relocating. This period would be more realistically set at 12 months.

Unreasonable to live at home provisions

The 'unreasonable to live at home' (UTLAH) provisions are outlined in the *Social Security Act* at section 1067A(9). A young person is considered independent if they are not receiving continuous support from a government agency or parent/guardian and it would be unreasonable to expect them to live at home because of:

1. extreme family breakdown or other similar exceptional circumstances
2. serious risk to their physical or mental well-being due to violence, sexual abuse or other similar unreasonable circumstances, or
3. parents being unable to provide a suitable home owing to a lack of stable accommodation.

These criteria are restrictive and involve complex assessment processes – especially given that the qualifiers for 'family breakdown', 'similar circumstances' and 'risk', are that they need to be 'extreme', 'exceptional', and 'serious' (respectively).

The *Social Security Guide* states that indicators of serious risk to the young person's physical or mental well-being include sexual, physical or psychological abuse. The young person need not be the subject of the abuse, but it must result in circumstances where it is unreasonable for the young person to live in the home. Evidence is required demonstrating 'serious risk' (section 3.2.5.50).

UTLAH provisions provide a pathway to independence, but the assessment process is complex and intrusive, and can exclude young people who may well meet the criteria but are unable to complete the claim and assessment process, or appeal, for reasons directly related to family violence or extreme family breakdown. Services Australia staff have a vital, proactive role to play.

Young people not adequately supported to escape family violence

The *Social Security Guide* makes it mandatory for UTLAH assessments relating to young people under 18 years of age to be carried out by a Services Australia social worker (section 3.2.5.70). Social workers may also refer a young person to a state or territory child welfare agency if they are at risk of abuse, serious harm or violence. Some discretion is applied, for example, referral of a young person under 15 years of age is likely but they may not refer a 17-year-old who is not at immediate risk and does not provide consent for referral.

In all cases, independent third-party verification of relevant circumstances is required unless a social worker considers there is enough evidence to apply UTLAH provisions without it. Third-party verification may include contacting grandparents, school counsellors, or religious leaders. Contact with parents is mandatory unless specific exceptions apply.

Services Australia provides guidance and training to social workers to prevent disclosure of sensitive information about a young person to their parents. Where a social worker is considering not contacting parents due to safety concerns, they are required to seek verification about contacting parents from their Social Work Manager.

Assessments for young people aged 18 years or older do not necessarily require social worker involvement,²¹ but a statement by an independent third party may be required if information from the young person and parent/guardian don't match (*Social Security Guide*, section 3.2.5.40).

If the Social Work Manager considers there is not enough information to confirm it is unreasonable for the young woman to live at home, they must reject the claim. For the young person, the stakes are high.

*This young person wanted to put in [an] application for Youth Allowance and would have qualified for independent rate under 'unreasonable to live at home' due to Dad's mental health and ... family violence. But there is a huge risk around the parents getting ordinarily notified if someone is lodging an 'unreasonable to live at home' request. Centrelink social workers have said, "No, no, no. As long as there's a notification of some type of family violence, we won't notify the parents." But, you know, where's the guarantee in that? There is significant risk. And even with a [restraining order] in place, Dad would have reacted really badly. Dad was paranoid that his daughter getting Youth Allowance was going to impact his DSP.*²²

— Regional Victoria

21 Department of Social Services (2023). [Social Security Guide – 3.2.5.70 Assessment & mandatory procedures for YA, DSP & SpB – unreasonable to live at home](#).

22 Note there is no payment rule wherein a person's DSP is affected by their child getting an income support payment (including Youth Allowance) in their own right.

Even with a young woman's permission, discussion of their situation may involve sharing information with an abusive parent that reveals details about their current circumstances, providing a mechanism for further abuse. The process remains fraught as a young woman desperate to leave an abusive household may not fully understand the implications of information sharing or may feel pressured to consent to disclosure of their information to gain access to social security support.

Even with a young woman's permission, discussion of their situation may involve sharing information with an abusive parent that reveals details about their current circumstances, providing a mechanism for further abuse

It only takes one small slip up, for a young woman to be exposed to higher risk due to the disclosure of information that would likely result in retaliation from the person using violence. Without a comprehensive understanding of the person's situation, with significant weight given to risk mitigation and safety, young women's lives can be at risk. We know that often many different individuals may work on one person's Centrelink matter or access their records. All it would take would be a flag on a young women's file being missed, that could lead to the next Centrelink worker who looks at it disclosing information that puts that woman at considerable risk.

— Regional Victoria

While delegation of UTLAH assessments to social workers is commendable, the process can place an unrealistic burden on a vulnerable young person to provide verification of abuse to avoid contact with their abuser. It requires a young person to navigate and satisfy complex processes while at risk, noting specific power dynamics are at play between the young person who does not understand the system, the large government agency, and abusive parents.

While sensitive information recorded by a social worker is kept in the Social Work Information System, which is only accessible to other social workers, that process is not well understood by young people and (usually) the community worker supporting them. In fact, many have only limited knowledge of Youth Payment (both eligibility criteria and the claim process).

She was living out of home but she was still considered to be dependent on the parents. I think that when things have been tough your whole life, everything can feel incredibly overwhelming. So she was like, "I don't even know how to do this". And I asked her Mum and she told me, "You can pay me for my time and then I'll show you how to do [the forms]". This is the beautiful environment that she was in. So, I sat her down and did the bits and pieces from that 'unreasonable to live at home' process. She then had to prove that it was unsafe for her to be there. So, we got the affidavits written up on the documents - how they need to be - and submitted [them] and she got a message back from Centrelink saying that they could not be used because they weren't from someone that she had lived with.

— Rural Queensland

Reluctance to take any action that could increase the risk to a young person was palpable from many community workers, based on a lack of trust in Services Australia's processes. Many expressed frustration that they could not easily provide direct support and feed into the UTLAH process, also lacking knowledge of specific eligibility and evidence provisions, as well as the process required to confirm UTLAH provisions.

Community workers report that many young women remain in an abusive family home or leave, without social security support, because they are unaware of, or fail to navigate, the UTLAH process.

Young women that are in a DV situation and their parents earn too much for them to gain Centrelink ... they're staying in their DV situation or their manipulative situation. We definitely see a lot of that.

— Rural Queensland

We have young people who are coming out from families where they're still considered to be able to be supported by [that] family except they've lived their whole life in this household where it's awful, and they've learned that that's not okay now, and they want to take that next step but they're still considered to be [dependent], and they're still under control of those people. The hardest thing is there are really well-paid people in this town where there's really severe DV going on in the household. To me, well, they've simply just cut their children off to be doing it on their own [when] they don't have the capacity to be doing it on their own. The parents say, "I'm not signing the form for you ... Screw you. Do it yourself."

— Rural Queensland

Parents' and others' representation of gender identity as a choice that can be pursued or abandoned fundamentally misunderstands gender identity and denies the harms that suppressing gender identity can do to a young person's mental and physical health

'Cultural or religious beliefs' exception failing young people

The *Social Security Guide* outlines assessment criteria related to family breakdown and other exception circumstances, including extreme and abnormal demands being placed on the young person, for example, arranged marriage (at 3.2.5.40). However, it also states that situations where it is not unreasonable to live at home include where the family considers the young person to be independent, including when this arises from their deeply held cultural or religious beliefs (at 3.2.5.60). These restrictions, and confusion around what is and isn't unreasonable on the basis of cultural and religious beliefs, create particular difficulties for young women in 4R areas whose circumstances do not meet the narrow definitions of family breakdown or serious risk.

We've had young women from CALD backgrounds who are at real risk of being forced into arranged marriages. I've often wondered how Centrelink would deal with this scenario if one of those young women fled the family home given, in our opinion, that constitutes both family violence and extreme risk. What would Centrelink do given the cultural basis for the risk and the family hasn't actually broken down? What are the chances of that young woman finding the pathway to support at Centrelink?

— Regional Victoria

The 'unreasonable to live at home' issue. We see a lot of young people that don't fit that criteria to the tee. Particularly young women in that category of 'extreme family breakdown'. Well, it's extreme for them, but that's subjective. Outside of their experience, Centrelink say, "That's not actually extreme".

— Regional Victoria

Service providers report that gender diverse young people face unique and compounding difficulties when attempting to satisfy UTLAH criteria. Frontline Services Australia officers triaging inquiries or claims can fail to recognise parents' actions as meeting the 'serious risk' threshold. Services Australia social workers are provided support, training and guidance to support gender diverse young people, including purpose-designed LGBTIQ+ Gender and Sexuality training, yet community workers continue to see cases of gender diverse young people unable to gain access to Youth Allowance.

That age range where they're adults theoretically in their own right, they are forced to live in a gender that's not theirs or we're looking at family violence where Mum and Dad are hiding their medication because they've accessed hormones for themselves [through] the sexual health clinics and the good outreach teams in the bush. So you can get under Medicare through the clinics and the [state government] health program. Then, Mum and Dad hide their medication or any number of things; deny it, which constitutes abuse, and they leave and [try to claim social security]. We still have to deal with Centrelink officers going, "Oh, but the parents say, 'It's not abuse, it's a choice. And if they stop doing it, they can live at home, and we'll continue to support them'". And children are then left not entitled to what is a reasonable right and [experiencing] child abuse because the person interpreting policy doesn't see trans as a need and a real issue. [Instead], "It's a choice".

— Statewide New South Wales

Parents' and others' representation of gender identity as a choice that can be pursued or abandoned fundamentally misunderstands gender identity and denies the harms that suppressing gender identity can do to a young person's mental and physical health.

This current system presents a frustrating Services Australia anomaly where young people can access healthcare support independently through Medicare but cannot always access income support through Centrelink to allow them to live safely.

Recommendation 49: That the Federal Government amend section 1067A(4) of the *Social Security Act* to lower the permanent independence age from 22 to 18 years for all Youth Allowance recipients.

Recommendation 50: That until the age of permanent independence is lowered to 18 years, the Federal Government amend section 1067A(4) of the *Social Security Act* to establish independence for young people who have been self-supporting for 12 months or more, regardless of parental income.

Recommendation 51: That until the age of permanent independence is lowered to 18 years, the Federal Government remove section 1067A(10E)(d) and (e), thereby removing the parental income threshold from concessional workforce independence criteria for young people from regional, rural, remote and very remote Australia.

Recommendation 52: That until the age of permanent independence is lowered to 18 years, the Federal Government amend section 1067A(10E)(d) of the *Social Security Act*, reducing the required period of employment since a person left secondary school from 14 months to 12 months for concessional workforce independence criteria for young people from regional, rural, remote and very remote Australia.

Recommendation 53: That the Federal Government amend section 1067G of the *Social Security Act* to immediately review and increase parental income thresholds for young people from regional, rural, remote and very remote areas who are seeking to access Youth Allowance.

Recommendation 54: That the Federal Government amend section 1067(9) of the *Social Security Act* to expand the Unreasonable to Live at Home criteria to include young people with documented history of family violence (including those who have applied for violence prevention orders), without requiring additional evidence of serious risk to physical or mental wellbeing.

Recommendation 55: That the Federal Government amend section 1067A of the *Social Security Act* to establish specific independence provisions for LGBTIQ+ young people where family relationships have broken down due to rejection or non-acceptance of their gender identity or sexual orientation.

Recommendation 56: That Services Australia develop specialised assessment protocols for LGBTIQ+ young people who are unable to live at home for reasons including issues of gender identity or sexual orientation.

Recommendation 57: That Services Australia improve Unreasonable to Live at Home assessment procedures to better recognise coercive control, psychological abuse, and family rejection as valid reasons to avoid parental contact.

Recommendation 58: That the Department of Social Services review and expand the definition of ‘continuous support’ to include situations where parents refuse to provide financial support regardless of their income level.

Recommendation 59: That Services Australia develop specialised training for staff assessing independence applications from young people in regional, rural, remote and very remote areas, with a particular focus on the unique challenges, safety risks, and economic realities faced by this cohort.

Binary nature of Youth Allowance (student) and Youth Allowance (other) creates gaps

Youth Allowance is available to young people who are studying full-time (at least 75 per cent of a full-time study load), undertaking an apprenticeship, or complying with strict job search requirements to prove they are looking for work. This rigid framework is a poor fit

for many young women who are unable to work enough hours to survive while studying. This is particularly the case for young women who have moved from 4R Australia to study at an urban tertiary institution given, by default, they cannot live at home.

In many instances, tertiary ‘study’ cannot be considered a mutual obligation activity. That leaves people unsure whether or not they will be able to complete their course while required to look for work

Risk of not completing course while studying with mutual obligations

The Youth Allowance system considers a person ‘a student’ or ‘unemployed’. If a person needs to reduce study hours below 75 per cent to take up more hours of work, they will no longer be eligible for Youth Allowance (student). Claiming Youth Allowance (other), which is routinely the only alternative income support payment, means they will be subject to mutual obligations. In many instances, tertiary ‘study’ cannot be considered a mutual obligation activity. That leaves people unsure whether or not they will be able to complete their course while required to look for work and, importantly, requires them to take up any offer of work when it is made. That is, if they are offered a full-time job, they are required to take it, regardless of where they are up to in their course. The system can also be unworkable for young people who are unable to study because of chronic and/or severe but sporadic illness.

Case study – Ella

Ella is from rural Australia and moved to the city to undertake university study. Ella lives with an autoimmune condition that manifests in a complex pattern of unpredictable flare-ups alternating between periods of relative wellness and debilitating fatigue and pain.

During her good periods, Ella thrived academically and could manage a full-time study load without difficulty. She was an engaged student who actively participated in classes and consistently produced high-quality assignments. However, when flare-ups struck, Ella was unable to get out of bed.

When Ella applied for Disability Support Pension (DSP), hoping for stable support for her health condition, she discovered that her illness fell into a frustrating grey area. While her symptoms were genuine and significantly impacted her capacity to study, they were deemed not severe enough to qualify for DSP. The episodic nature of her condition worked against her in the assessment process, as her good days were seen as evidence that she could maintain regular work or study commitments.

Left with Youth Allowance as her only option, Ella found herself trapped by the system's rigid requirements. Her specialist recommended reducing to part-time study to better manage her condition and prevent the stress-induced flare-ups that full-time study often triggered. The doctor explained that pushing through during flare-ups could worsen her long-term prognosis and potentially lead to more severe complications of her autoimmune condition.

Implementing this medical advice would immediately disqualify Ella from Youth Allowance, as the payment required maintaining at least 75 per cent of a full-time study load. The accommodation she needed to successfully complete her education would eliminate her ability to afford that education. Part-time work was equally impossible during flare-ups, and even during well periods, her doctor advised against the stress and physical demands of substantial work.

Ella found herself forced to choose between following medical advice that could protect her long-term health and maintaining the financial support she needed to survive as a student. The decision felt impossible. Continuing full-time study meant risking her health and potentially triggering more frequent and severe flares. Reducing her study load meant losing her only source of income and being forced to abandon her education goals entirely.

While in certain circumstances, a young person can be paid Youth Allowance (student) if they are undertaking less than a 75 per cent load and temporarily incapacitated due to a medical condition or illness, that relies on the young person being aware of, and navigating the pathway to, that option – which may be particularly challenging if they are unwell.

Youth Allowance income test a Catch-22 for students

The structure of Youth Allowance (student) and Youth Allowance (other) can lead to difficult decisions for a young person who is unable to work enough hours to generate income to survive while completing at least 75 per cent of a full course load. Dropping a subject will often mean a person is no longer eligible for Youth Allowance (student), and so required to claim Youth Allowance (other) to continue receiving income support. However, Youth Allowance (other) has a substantially lower income threshold and taper rate. That places young people in the unenviable position of needing to reduce study hours so they can increase working hours, but unless they substantially reduce study hours and substantially increase working hours, they will not be financially better off.

Table 2: Youth Allowance Income test – 18 to 22 years old (single, no children), lives at parents' home

Youth Allowance	Reduces by 50 cents for every \$1 of income between ...	Then, reduces by 60 cents for every \$1 of income over ...	Youth Allowance reduces to \$0
Student	\$528 and \$633	\$633	\$1340.67
Other	\$150 and \$250	\$250	\$961.84

The grossly inequitable assessment of income between Youth Allowance (student) and Youth Allowance (other) can leave young people who are working while studying – for the purposes of securing long-term secure employment – in dire straits. Community service providers reported students dropping out because they cannot financially survive. To add insult to injury, some of these young women have accumulated a sizable HECS/HELP debt that will continue to increase per indexation, despite never completing the studies which would have opened up employment options.

Recommendation 60: That the Department of Social Services review youth payment study requirements with a view to creating flexible study load options that allow a recipient to undertake part-time study without losing payment eligibility, particularly for young women experiencing health challenges or caring responsibilities.

Patchwork out-of-home care systems inadequate

Young women leaving out-of-home care in 4R Australia face a complex web of jurisdictional and accessibility challenges that create barriers to social security support. Each state and territory government operates under a specific legislative and policy framework governing its child protection systems, including support for young people in, and transitioning from, out-of-home care. Service providers reported that vulnerable children and young people are falling through Commonwealth-State jurisdictional gaps.

The Commonwealth social security system operates on the assumption that young people in state or territory care should be supported by those jurisdictions. However, state and territory governments often provide insufficient support, particularly once young people reach 18 years of age

At its core, different levels of government have conflicting expectations. The Commonwealth social security system operates on the assumption that young people in state or territory care should be supported by those jurisdictions. However, state and territory governments often provide insufficient support, particularly once young people reach 18 years of age. Marginalised and traumatised young women then experience delays accessing social security support or miss out entirely during their critical transition to independence.

There is wide variation in support across jurisdictions, including different planning timelines, age limits, and financial assistance arrangements. These intersect in complex ways with social security eligibility and payment rates. For example, some young women who are living in voluntary out-of-home placements without a court order may not meet 'independent' criteria on the basis of being in state care.²³ This can occur when a young woman is informally placed with extended family by a child protection agency. The young woman would need to know about and request a UTLAH assessment, then satisfy UTLAH criteria before she could be deemed independent.

Some state/territory support, such as the NSW Independent Living Allowance, is deemed 'upkeep' and a young person receiving this payment is regarded by Services Australia as being in supported State care. As a result, the young person would be deemed independent but eligible for only the (low) 'at home' rate of Youth Allowance.²⁴

Other state/territory care is considered 'unsupported' State care, so a young person in this situation would be deemed independent and eligible for the 'away from home' rate. This may occur when a young person is paying for their own accommodation, food, and other expenses, irrespective of whether the accommodation is offered at a reduced or subsidised rate or the care organisation is in receipt of government funding.

²³ Services Australia. [Rate of Youth Allowance \(YA\) when customer is in State care 010-06040020](#).

²⁴ Services Australia. [Assessing independence when a customer is in State care 001-04060070](#).

Often young women will not know whether they are receiving the correct rate of social security payment, noting they may have limited understanding of the conditions attached to their care.

In so many instances, it's hard to ascertain even the type of child protection order a young person is under, whose care they are legally under, and to get a copy of the order to determine the varying conditions. Young people subject to the child protection system often lack understanding of orders pertaining to them, let alone having the skills to navigate the accessing of a social security benefit that directly depends on whether or not they are in, and the kind of, 'State care'.

— Regional Victoria

As well as providing payments while a young person is in State care, Services Australia facilitates payment of the Transition to Independent Living Allowance, which can be paid to young people leaving care. This is a one-off payment of up to \$1500, which can be used towards the costs of leaving care including residential tenancy bonds, furniture, and study costs. The young person must work with their state/territory case worker to decide how this is best spent. Receipt of the Transition to Independent Living Allowance can preclude payment of some state-territory financial support, whether or not it is sufficient to cover transition costs. The Transition to Independent Living Allowance is not indexed and has not increased in more than 15 years. Urgent attention is required to bring the payment in line with its original intended purpose by increase and indexing the payment.

Service providers reported a lack of systematic communication protocols between state/territory child protection agencies and Services Australia. Information about a placement arrangement changing, schooling coming to an end or young women transitioning out of state/territory care can fail to reach Services Australia in a timely manner. This can leave a dangerous gap for young women, particularly in 4R areas where support services are limited to non-existent and geographic isolation can exacerbate risk.

Often young women will not know whether they are receiving the correct rate of social security payment, noting they may have limited understanding of the conditions attached to their care

Services Australia requires written confirmation from a state/territory child protection agency to confirm that a young person has left care and is no longer being financially supported.²⁵ Confirmation delays can lead to delays in social security payments, which can be particularly problematic given the time-sensitive nature of housing acquisition and lack of financial security for young people transitioning from care.

My feedback on behalf of young people applying for Centrelink is just the amount of time that it takes. You're talking months from when you apply until when you actually get your first payment. It's a really anxiety-provoking thing for a 17-year-old who's about to leave care and there's nothing that they can do to influence that.

— Regional Queensland

²⁵ Ibid.

Young women leaving care may lack the administrative knowledge and emotional capacity to navigate reporting requirements of different government systems, particularly when contending with a history of the state/territory government making decisions on their behalf. The expectation that they will understand and manage the intersection between State care support and Commonwealth payments places an unreasonable burden on young women who are dealing with the trauma of their care experience and the stress of transition to independence.

Case study – Monique

Monique grew up in a regional town where, at age seven, the state child protection authority removed her from her biological parents and placed her in a residential group home. This institutional setting became her home for the next 11 years until she ‘aged out’ of the group home, which shaped her childhood and adolescence.

Shortly before Monique’s sixteenth birthday, a child protection worker accompanied her to the local Centrelink office. In the public waiting area, the worker used the computer terminal to lodge a Youth Allowance (student) application on Monique’s behalf. The application was linked to Monique’s enrolment at an alternative school designed for at-risk young people. Monique had no understanding that she had been signed up for Youth Allowance or that the payment was conditional on maintaining her school enrolment.

The trauma of her early experiences had left Monique deeply mistrustful of authority figures, making the school environment particularly challenging. Her complicated and traumatic childhood, fear and anxiety around institutional settings, and a number of medical conditions made regular school attendance extremely difficult, eventually leading her to stop attending school altogether. Unable to cope with the group home environment and the pressures of mandatory schooling, Monique made the desperate decision to run away from the group home.

A year later, Services Australia contacted Monique demanding repayment of Youth Allowance payments she had received during periods of non-attendance at school. The debt notice came as a shock as she had never understood the conditions attached to her payments. More troubling was Services Australia’s failure to consider that Monique may have been entitled to Youth Allowance under a different category. Given her circumstances and medical conditions, she could have qualified for Youth Allowance (other) with a medical exemption, meaning the debt would not have existed.

For a young woman struggling with post-traumatic stress disorder and the legacy of childhood trauma, the debt notice became another traumatic encounter with government authority. Having no means to repay the money and no understanding of her rights to challenge the decision, Monique withdrew further from society. The stress of the debt, combined with her existing mental health challenges, led to such severe anxiety that she became unable to leave her accommodation, effectively trapping her in isolation.

It wasn’t until she was referred to a service supporting people leaving care that she was linked into an EJA Member Centre who was able to assist her to seek a waiver of the debt.

Create Foundation²⁶ has called for a guaranteed independent living allowance of \$16,000 per annum for those up to the age of 25 who are leaving care, recognising that young people with a care experience are more vulnerable to financial hardship and risk of homelessness because they do not always have the safety net of extended family to support them through times of need.²⁷ EJA supports the rationale of this recommendation, seeking the support of the Department of Social Services to establish how a guaranteed independent living allowance or comparable measure may be embedded in the social security system.

Recommendation 61: That the Department of Social Services and Services Australia consider informal and voluntary out-of-home arrangements (supported by local child protection agencies) for the purpose of assessing independence.

Recommendation 62: The Federal Government increase the rate of, and index, Transition to Independent Living Allowance.

Recommendation 63: That the Federal Government amend section 1067G of the *Social Security Act* regarding classification of state and territory support payments to allow all young people leaving care to receive the higher 'away from home' rate of Youth Allowance, regardless of the type of state support they receive; or establish a guaranteed independent living allowance or comparable measure.

26 The national consumer body representing the voices of children and young people with an out-of-home care experience.

27 Create Foundation (2024). [Create Foundation election priorities 2024](#).

Appendix 1 – Contributors to this report

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