Submission to: Senate Standing Committee on Community Affairs, Legislation Committee, Inquiry into the provisions of the Social Security (Administration) Amendment (Income Management Reform) Bill 2023

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We make this submission as two researchers at the Australian National University who had a leading role in the evaluation of New Income Management in the Northern Territory (Bray et al 2014).

This evaluation concluded:

> The evaluation data does not provide evidence of income management having improved the outcomes that it was intending to have an impact upon. Indeed, rather than promoting independence and the building of skills and capabilities, New Income Management in the Northern Territory appears to have encouraged increasing dependence upon the welfare system, and the tools which were envisaged as providing them with the skills to manage have rather become instruments which relieve them of the burden of management (p. xxii)

Since undertaking the evaluation we have continued to monitor a wide range of social outcomes in the Northern Territory and studied and reviewed the wide range of subsequent studies and reports. This research confirms our earlier findings.

Recommendations

Reflecting this we recommend to the Committee that:

1. The current Bill be substantially revised, in line with recommendations 2 and 3, or rejected, as while providing for the use of an alternative to the BasicsCard, it perpetuates the existing income management regime in the Northern Territory and indeed allows for the Minister to extend this to other locations.

2. The government bring forward revised legislation with a clear deadline for the cessation of the existing compulsory income management regime in the Northern Territory. In such legislation we note that there may be provision for maintaining a voluntary scheme, and for specifically targeted measures in the Northern Territory and elsewhere but with these only being activated on

the basis of individual assessment of the circumstances of an individual who has a demonstrated need for the intervention and who is provided with additional support services, or possibly in discrete communities where such policies are requested by the community as a whole, including those who may be subject to the measure[1].

3. It rejects all elements of the Bill which act to extend the scope of income management including the ability of the Minister to declare an extension of the 'disengaged youth' and 'long-term welfare recipient' measures to other states, and the school enrolment and attendance measures, along with the introduction of a number of default 100 per cent levels of income management.

4. That the government engage in clear and transparent consultations with communities on transitioning off the existing income management arrangements and clearly commit to deliver support services for this process, and that these consultations be Indigenous-led and not be undertaken by the Department of Social Services or Services Australia.

Specifically, in making these recommendations, we emphasise that while we believe that the evidence is clear that compulsory income management as applied to classes of individuals – such as all those on a particular payment – should be abolished, we consider that there may be scope for the use of this policy for some individuals who have been individually and specifically assessed as having problems with financial management. We emphasise however that the evidence supporting this points to this policy being essentially palliative and that it needs to be complemented by effective individualised support to assist these people address the more fundamental problems which they face.

We additionally would record that, despite the avowed role of income management to assist family financial management, including limiting inappropriate levels of expenditure on alcohol and tobacco, application on the basis of triggers such as school attendance places it squarely in a punitive role.

Discussion

In the following sections we:

- Document the failure of income management over a 15 year period to achieve improved outcomes in the Northern Territory.
- Analyse the claims of Human Rights compliance of the policy as documented in the explanatory memorandum
- Review the proposal for the new 'SmartCard'
- Address the proposed scope for expansion of income management into other locations and with additional triggers.

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[1] In recognising that this approach may be preferred in some communities we emphasise that considerable care would need to exercised in the particular model adopted – for example an approach such as the Cape York Family Responsibilities Commission – to ensure it responds to the needs of the community, and in ensuring that decisions reflect whole of community views. Caution is also required to ensure that in such cases the program represents a real response to community needs and does not simply entrench dependence upon the measure

- Discuss how the paternalistic nature of the policy has led to dependency rather than independence.
- Discuss the rationale for our recommendation concerning consultations.

Compulsory Income Management has failed

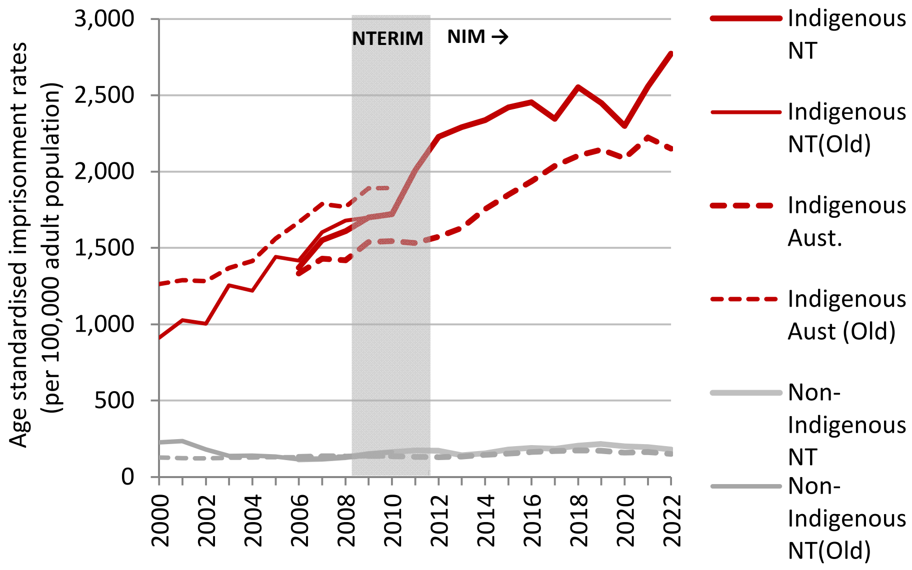
From our research and the review of the research of others we believe there is clear evidence that the imposition of income management on broad classes of income support recipients has failed. This was the fundamental finding of both our research into 'New Income Management' in the Northern Territory and the evaluation of Place Based Income Management undertaken by Deloitte (2015). These two studies are the only ones undertaken with a clear longitudinal component and a control population.

The robustness of this finding can be seen in the failure of compulsory income management to achieve any positive outcomes in the Northern Territory despite having operated since 2007. This failure is perhaps most marked in terms of a failure to achieve improvements in well-being for the Aboriginal population of the Territory. Data on the trends in imprisonment, low birthweight, child vulnerability and school attendance are reported below[2].

Figure 1 reports the age standardised imprisonment rates for the Northern Territory and Australian Indigenous adult populations and the non-Indigenous imprisonment rate for the Northern Territory over the period 2000 to 2020. The rate of imprisonment of Indigenous adults in the Northern Territory is much higher than the rate of imprisonment of non-Indigenous adults and the difference has dramatically widened since 2000. Furthermore since the introduction of the Northern Territory Emergency Response Income Management (NTERIM) in 2007 and subsequently New Income Management imprisonment rates for Indigenous people in the Northern Territory have increased relative to the rate for Indigenous people in Australia as a whole.

[2] Given the relatively short timeline available for preparing this submission we have not been able to comprehensively update the data detailed below, although some additional notes are provided with respect to later data. A more detailed review of these and other indicators is presented in Bray (2020).

Figure 1. Age standardised rates of imprisonment by Indigenous status, Northern Territory and Australia, 2000 to 2022.



Note: 'Old' refers to the previous series.

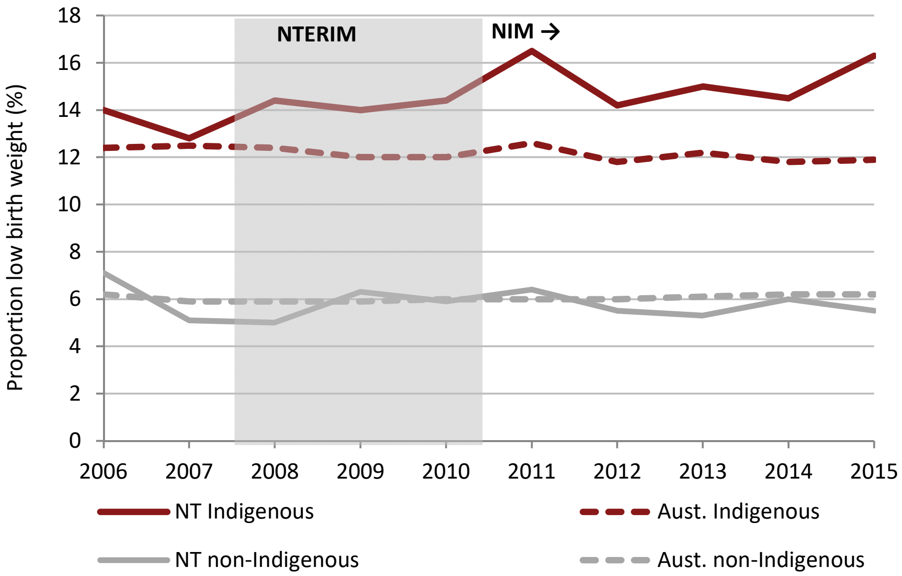
Source: ABS, Prisoners in Australia, Cat. No. 4517, 2008, 2012 & 2022.

In addition data on more specific crime, while volatile over time, shows no consistent positive trends, and indeed in 2021 the Indigenous victimisation rate in the Northern Territory was the highest recorded in the series commencing in 2008 (ABS Recorded Crime Victims 2021, Table 23).

Figure 2 reports the proportion of low birthweight babies for the Indigenous and non-Indigenous populations in the Northern Territory and Australia as a whole over the period 2006 to 2015. There is some evidence of an increasing gap in the proportion of low birthweight Northern Territory Indigenous babies over the period since the NTERIM. For Australia as a whole the proportion of low birthweight Indigenous and non-Indigenous babies has not changed over the period.

The AIHW (2018) explain the importance of this indicator as 'babies who are born with low birthweight are at greater risk of poor health, disability and death than other babies,' and further reports that 'low birthweight is a risk factor for neurological and physical disabilities, with the risk of adverse outcomes increasing with decreasing birthweight… The health effects of low birthweight can continue into adulthood. Research has found an increased risk of Type 2 diabetes, high blood pressure as well as metabolic and cardiovascular diseases'.

Figure 2. Low Birthweight, Indigenous and non-Indigenous, Northern Territory and Australia, 2006-2015

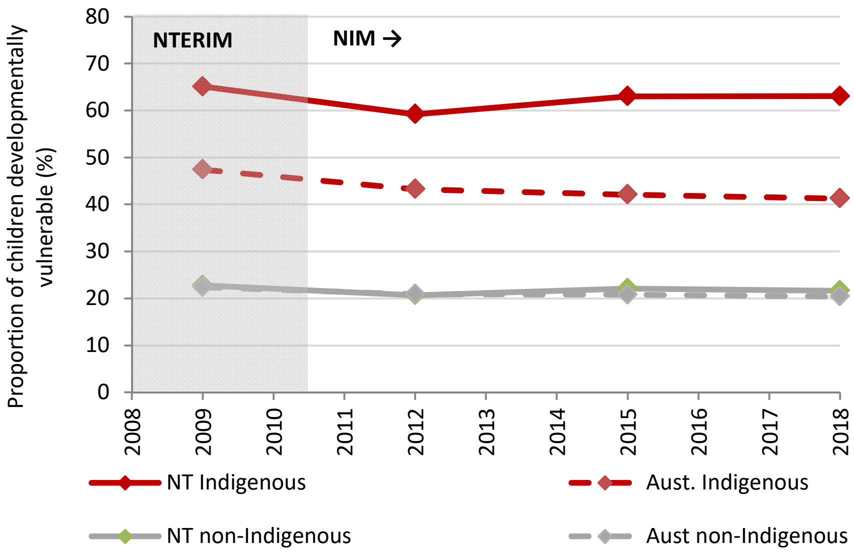


Source: Children's Headline Indicators (AIHW, 2018)

More recent data for 2020 from AIHW analysis of National Perinatal Data Collection indicates that the proportion of low birthweight births for Aboriginal and Torres Strait Islander mothers in the Northern Territory was 16.4 per cent (AIHW 2022, Table 3.1.2). Research (Doyle, Schurer and Silburn 2022) reports, from analysis of the impact of the initial roll-out of income management under the NTER, that "exposure to the income management policy reduced average birthweight robustly by 85 g and increased the risk of low birth weight by 3 percentage points" (p. 1). They further reported that this was not explained by behavioural change such as maternal risk behaviour, but was most likely attributable to "acute income insecurity and stress during the rollout period, exacerbating the existing health inequalities it sought to address" (p. 1).

Figure 3 reports the proportion of Indigenous and non-Indigenous children in the Northern Territory and Australia as a whole that assessed as being developmentally vulnerable at age four. A high proportion of Indigenous children in the Northern Territory are developmentally vulnerable at age four (around 60%). Of particular note is the emergence of an increasing gap between those Indigenous children in the Northern Territory and Indigenous children in Australia as a whole – that is, the trend in the Northern Territory since 2012 runs counter to the ongoing decline in vulnerability experienced by Indigenous children nationally

Figure 3. Proportion of children developmentally vulnerable in one or more domains of the Australian Early Development Census by Indigeneity, Northern Territory and Australia, 2009–18

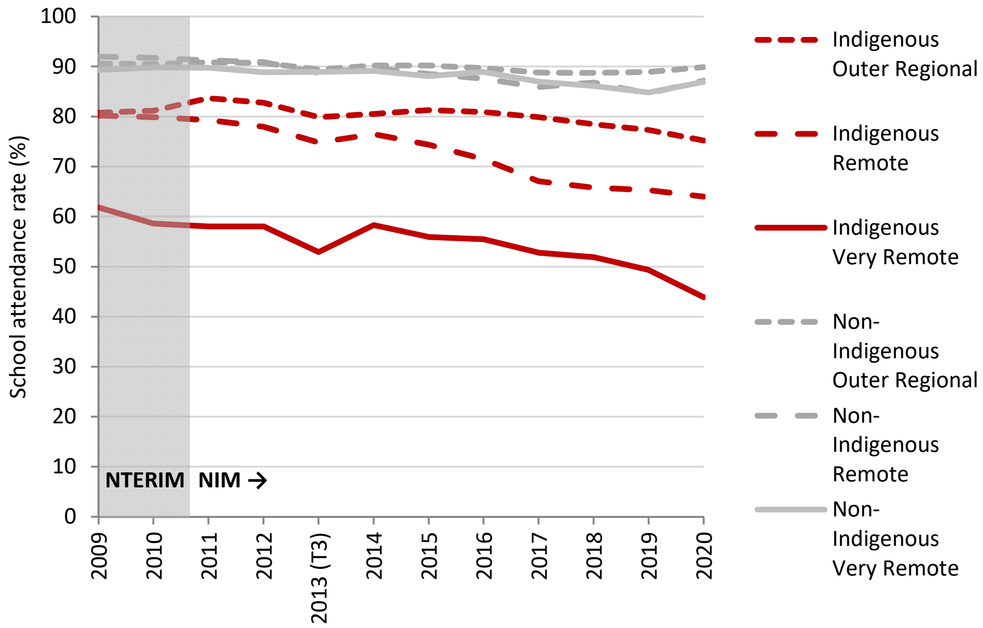


Source: Children's Headline Indicators (AIHW, 2018), updated with 2018 AEDC data.

Figure 4 presents data on school attendance in the Northern Territory between 2009 and 2020. While not covering the full time period of income management, based on the analysis of the Northern Territory Department of Education data on school attendance at schools that were in the prescribed areas subject to the NTERIM, the official Australian Government Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) evaluation of the NTER reported that 'there has been no observable improvement in school attendance between 2006, before the NTER was introduced, and 2010, the last full year for which data are available' (FaHCSIA 2011, 292).

As shown in the figure there has been a marked decline in the school attendance rate for Aboriginal and Torres Strait Islander children in the Northern Territory, especially in remote and very remote locations.

Figure 4. Northern Territory School attendance by remoteness and Indigeneity, 2009–20



Note: The Northern Territory Department advises that new enrolment and attendance processes were introduced in 2013. As a consequence 2013 represents a break in series and therefore enrolment and attendance data prior to 2013 cannot be directly compared to 2013 or onwards datasets. This break is not considered to significantly impact the analysis presented here, with the trends before and after this break being consistent.

Data covers Early Years, Primary Years, Middle Years and Senior Years.

ARIA remoteness categories. Outer Regional comprises Darwin and Palmerston.

Source: Enrolment and attendance statistics (Northern Territory Department of Education, various).

2022 data shows an ongoing downwards trend in school attendance for both Indigenous and non-Indigenous children (NT Department of Education 2023), although it is not possible to assess the extent this may have been impacted by COVID-19.

Human Rights

The Explanatory Memorandum for the Bill contains a ‘Statement of Compatibility with Human Rights’ which declares “This Bill is compatible with the human rights and freedoms recognised or declared in the international instruments listed in section 3 of the Human Rights (Parliamentary Scrutiny) Act 2011”. This claim is one which we consider the Committee should review.

Income management and racial discrimination

The “Statement of Compatibility with Human Rights” states:

> As has been observed with the CDC program (under abolition) and the IM regime, individuals who become subject to the enhanced IM regime may include a high proportion of First Nations people. Extensive consultation has been undertaken and continues with First Nations communities and other stakeholders about the enhanced IM regime and the future of income management more broadly so that any direct or indirect limitations on the rights to equality and non-discrimination are avoided or minimised in a way that is reasonable, necessary and proportionate.

> This Bill does not directly limit an individual's right to equality and non-discrimination. It ensures that individuals who choose to transfer to the enhanced IM regime, and those that become subject to it by virtue of their particular circumstances, are not identified based on race, colour, nationality, sex or gender. Rather, all individuals who become subject to the enhanced IM regime do so on the basis of their individual circumstances, including their usual place of residence where relevant. Once an individual is subject to the enhanced IM regime, they will receive the same access to facilities and technology as all other individuals subject to the enhanced IM regime.

We consider that this is pure sophistry and does not address the essential characteristic of income management which is that it has been primarily targeted at Aboriginal and Torres Strait Islander Australians. This is clear in the major geographic areas in which the policies have been implemented and even more so with regard to the composition of participants.

- The latest regularly published statistical data we can locate[3] which provides a breakdown by Indigenous status shows that in November 2018 17,939 out of 21,718 participants in the Northern Territory were Indigenous – that is 82.6 per cent, along with 46.3 per cent in other locations.[4]
  - This is so disproportionate with respect to the population and the population of income support recipients that it renders claims of not being racially targeted patently false.
- We further consider that departmental decisions not to regularly publish such a breakdown in their ongoing data reports, a decision which appears to have continued notwithstanding the change in government, reflects a deliberate strategy of obscuring the impact of the program on Indigenous Australians.

In addition, we consider that the statement "all individuals who become subject to the enhanced IM regime do so on the basis of their individual circumstances, including their usual place of residence where relevant" is highly misleading. The essential nature of the main elements of compulsory income management is that people are not subject to the measure because of their "individual circumstances", but rather the program takes no account of the individual and their circumstances, but places them on the program on the basis of their membership of a particular class of persons related to their pattern of receipt of income support.

Other aspects of Human Rights compliance

A number of other aspects of human rights are addressed in the 'Statement of Compatibility'. Again the material presented appears to be skewed to avoid discussing the extent to which rights are fundamentally restricted, rather than a true accounting of the infringements:

<u>Choice of form of receipt of income support</u>

> "The Bill ensures individuals retain the maximum level of choice around the mechanism for receiving their welfare payments"

[3] We have searched both the Departmental website and data.gov.au. We note that the publications which previously provided this data have now been removed from data.gov.au, and that such a breakdown is not available in the current series of "Income Management Data Summary" reports on the site.

[4] DSS (2022, 8) Indicates that as at 27 May 2022 some 84 per cent of the 23,099 persons subject to income management in the Northern Territory were Aboriginal or Torres Strait Islanders.

This obviously is not the case – Income Management by its very nature reduces the level of choice as to how individuals receive their income support.

Privacy and reputation

> "Article 17(1) of the ICCPR prohibits unlawful or arbitrary interferences with a person's privacy, family, home and correspondence, nor should a person be subjected to unlawful attacks on his or her honour and reputation. … Any limitations pertaining to a person's right to a [sic] privacy and reputation are reasonable, proportionate and appropriate in order to provide choice and thereby promoting positive financial decisions"

Placing a person in compulsory income management is a direct assault on their honour and reputation – implicit in the placement is that the person is not capable of managing their own finances and requires these to be managed. This has a profound impact on many individuals with, as we report in the evaluation of New Income Management, with the majority of participants reporting that sometimes, or more frequently, they feel discriminated against, embarrassed or a sense of being unfairly treated.

While the statement further claims "Updated technology reduces the likelihood that a welfare payment recipient will be subject to undue harassment in relation to their welfare payments or stigma of a BasicsCard", there is no rationale provided for this, and indeed the concept of 'undue harassment' would suggest that there is a concept of 'due harassment' which is acceptable.

Right to social security

> The right to social security is limited only to the extent that individuals subject to the enhanced IM regime may not use a portion of their payment to purchase excluded goods or excluded services. This Bill does not affect the eligibility of a person to receive welfare payments, nor reduce the amount of a person's welfare payments. It simply ensures that individuals subject to the enhanced IM regime have a portion of their welfare payments available to meet their basic needs, such as rent, food, and household bills."

While the 'right to social security' may not be technically limited this statement ignores a number of issues:

- We have noted in the past (Gray and Bray 2018, 3-4) the impact of minimum purchase amounts and the charging of standard EFTPOS fees on card transactions – neither of course which apply to cash.
- In the Evaluation Report we noted a concern that one of the impacts of Income Management was to discourage individuals entitled to income support from applying for it due to a sense of shame (Bray et al 2014, 249). This concern appears to be supported by analysis such as that of Venn, Biddle and Sanders (2020), which reports from analysis of 50-year trends that: "There was also a notable increase in the proportion of Indigenous adults without any source of income" (p.23).

Conclusion

The statement concludes with the claim that "Any limiting measures are reasonable, necessary and proportionate to achieving the objectives of reforming income management in Australia, which offers self-determination for communities, and choice and protection for vulnerable people." This statement appears to be totally at odds with the legislation which does nothing to reform income management and nothing to offer self-determination and choice – the legislation effectively replaces one payment card with another.

Possible follow up

Given the issues identified the Committee may wish to ask for the legal opinions which underpin the statements of compliance.

The proposed SmartCard

The introduction of the new "SmartCard" appears to be the primary focus of the Minister's second reading speech and the way in which it was presented would appear to embody the overblown marketing of a very 'thin' product, without any attempt to engage with the more fundamental aspects of the policy, the cost of the change, or its impact on people:

> the enhanced income management regime, which offers improved technology and access to over a million outlets across Australia, as well as tap-and-go transactions, online shopping and BPAY … the same choice to use the contemporary technology … The more modern SmartCard provides banking functions, including, as I said, the tap-to-pay payments, online shopping and BPAY bill payments. Importantly, the SmartCard is delivered by Services Australia and has a PIN for added protection (Rishworth 2023)

The spin in this statement can be seen in the use of language such as 'improved technology' and 'contemporary technology'; 'over a million outlets'; 'tap and go' (twice); and of course 'The more modern SmartCard'. Similarly is the repetitive use, in the speech and the explanatory memorandum, of the language of an 'enhanced income management' regime – with little substance as to what is actually enhanced – as opposed to rebadged.

We are also confused by the Minister spruiking the new arrangement in this statement on the basis that it "has a PIN for added protection". The existence of a PIN has long been a feature of the BasicsCard – as detailed in the BasicsCard Terms and Conditions over a decade ago:

> 2.4 What is your PIN?
>
> A PIN is the 4-digit number that you must enter at a merchant terminal when using your BasicsCard.
>
> You must select a PIN when you first receive your BasicsCard. You also can change your PIN by contacting Centrelink.
>
> You can only use your BasicsCard with a PIN. (Bray et al 2012, 319)

This again, seems to be a case of the approach of the Minister and Department to this Bill as a marketing exercise, rather than a serious explanation of the rationale for maintaining this deeply flawed policy.

Expansion of scope of income management

While the Minister in her second reading speech declared "This bill does not change the eligibility criteria which determine whether an individual is placed on income management. … Any new participants who will be placed on enhanced income management would otherwise have been placed on income management" (Rishworth 2023, 19), this does not appear to be correct. As we understand it the legislation provides for the potential and actual expansion of the eligibility criteria in at least two ways. These are considered below:

Expanded geographic scope of the 'disengaged youth' and 'long-term welfare recipient' measures

The proposed inclusion of section 123SDA extends the application of the 'Disengaged youth' and 'Long-term welfare payment recipient' provisions of income management beyond the Northern Territory to any location within Australia subject to ministerial declaration through a legislative instrument.

There is no rationale for this provision, nor for enabling such an extension of income management by instrument rather than legislation. This provision, at this time, runs totally contrary to commitments to review the future of income management and electoral commitments to "not pursue any expansion of the Cashless Debit card or community wide income management" (Australian Labor Party 2021, 57)

It also appears totally contradictory to the position as stated by the now Minister for Indigenous Australians in 2020:

> Labor is not opposed to income management in all circumstances. We've been clear about that. There are circumstances, such as where there are issues of child protection, domestic violence or dysfunction, where income management is appropriate. There's no argument about that. But the argument is about broad-based compulsory programs that catch and disempower the wrong people. I went to the Bundaberg and Hervey Bay area, and I heard from several non-Aboriginal young women, single mums, who had been put on to the card without their consent. They are finding it so disempowering, so embarrassing, and their discussions with me left a powerful impact. Income management can be justified when targeted, as I said, in some circumstances. But indiscriminate, broad-based income management simply does not work. (Burney 2020)

If this provision is needed for a transitional purpose then it should be more tightly specified with all elements in legislation rather than by instrument, and it should be time limited.

School attendance and enrolment

As we understand it, this provision seeks to generalise and continue the placement of persons on income management due to non-enrolment or attendance by children at school.[5]

As such, this provision appears to be a reinvention of the previous failed School Enrolment and Attendance Measures (SEAM) program which used income support sanctions to address non-enrolment of children in schools and poor attendance. In scrapping the program the then Indigenous Affairs Minister Nigel Scullion was reported as saying that the program had been "a total failure" (Cunningham 2017).

This verdict is also reflected in the range of evaluative material available which led the Parliamentary Joint Committee on Human Rights in their "2016 Review of Stronger Futures measures" to conclude:

> On the basis of the ANAO and PM&C reports, SEAM does not appear to be an effective approach to addressing issues of low school enrolment and attendance. While SEAM may have led parents to reflect on the importance of schooling, it did not adequately address unauthorised absences in NT government schools, and had no lasting impact on attendance rates across private and public schools in the NT. (para 5.63)

Subsequently Goldstein and Hiscox (2018) report on a randomised Control Trial of the program conducted in 2016 and concluded:

> This study has found that, although the SEAM intervention was being implemented roughly according to expectations, there were no statistically significant differences in attendance before and after SEAM intervention for students in the seven NT schools included in this study. (p. 11)

Additionally, Cobb-Clark et al (2021), looking at the initial introduction of income management in the Northern Territory, report "that attendance fell by 3 percentage points, or 4.7 percent, on average in the first five months after the introduction of income management" (p. 34).

The proposed extension of this trigger, along with the 100 per cent default level of income management has not been justified in any documentation we have seen. In addition there is no analysis of why it is considered this would be effective given the failure of SEAM, nor is there any commitment to its evaluation.

While we recognise that school attendance can trigger referral to the Family Responsibilities Commission in the Cape York initiative, in these cases income management is only one of the tools available to the Commission, and is only imposed where it is seen to be an appropriate response to the circumstances. In 2021-2022 for example of the 346 people placed on a conditional case plan only 63 were placed on income management, with a further 26 placed on income management without a conditional case plan (FRC 2022, 25).

More fundamentally the use of income management in this way has nothing to do with the stated objective of the policy being a "tool that helps people budget their welfare payments" (DSS 2023), but rather the application of income management is a punitive instrument to achieve outcomes

[5] We cannot find any statistics on the actual use of this provision in existing arrangements.

which are unrelated to the way in which families may use their entitlement to income support. While some may consider this to be an appropriate role, it is important that it is presented as such, and not as a program to help manage spending.

Paternalism

At its heart Income Management is a paternalistic policy based on the presumption that those who are subject to the measure are not capable of effectively and responsibly spending their income support payments. This is highlighted in the DSS website which describes the program as:

> Income Management is a tool that helps people budget their welfare payments and ensures they are getting the basic essentials of life, such as food, housing, electricity and education. Improved control of their finances helps people to stabilise their lives so they can better care for themselves and their children. (DSS 2023)

This statement ignores the fact that many people subject to the measure do not require this ‘help’ and have effectively managed their finances over an extended period. Similarly, the implication that their lives require ‘stabilisation’ so that they can ‘better care for themselves and their children’ – simply on the basis that they have been on a particular income support payment in a certain location for a certain period is patronising and paternalistic.

As we and others have pointed out, the targeting of this program at Indigenous Australians and its underlying paternalistic rationale reflects a very long strand of Australian history. From the payment of Indigenous workers in rations, through to the role of state governments and others in the history of stolen wages.

A key concern we have with the paternalistic nature of the program is that of ‘learned dependence’. This is something which we identified in our evaluation findings:

> Indeed, rather than promoting independence and the building of skills and capabilities, New Income Management in the Northern Territory appears to have encouraged increasing dependence upon the welfare system, and the tools which were envisaged as providing people with the skills to manage have rather become instruments that relieve them of the burden of management. While at one level, and for some groups, this may be still seen as a positive outcome and one which they report as having improved their quality of life – and it is possible that some may be able to lift themselves out of their situation – more broadly it also comes at a cost of greater dependence. (Bray et al 2014, 320)

We report on the processes of this, in terms of the ‘unintended consequences’:

> income management has not built independence and individual capability, but has rather acted, through making some people’s lives easier and relieving them of having to manage aspects of their finances. This in turn has led many to aspire to remain on income management, and hence income support. …. The effect of the program having made life easier and of relieving people of the burden of financial management was most strongly seen … in the case of Voluntary Income Management, with over 70 per cent of the overwhelming majority of respondents who indicated that they wanted to remain on

> income management saying that a reason for this was that it was easier being income managed. A substantial proportion of the Indigenous population on compulsory income management measures also expressed a desire to stay on income management. Amongst this group over half responded in the survey that one of the reasons for this was that it was easier to manage their money and 40 per cent saying a reason was that they were used to it and it was easier to stay on. (p. 329)

While we reported this as an 'unintended consequence' – it was however not an 'unexpected' consequence and as indicated in the evaluation it had "been raised by both the Australian National Audit Office which noted that 'there is an inherent risk that instead of developing budgeting skills, customers may come to rely on DHS' and the Forrest Review which considered that income management 'can make transitions off welfare and into work more difficult'" (p. 306).

Consultations and Departmental role

In our recommendations we suggest that the consultations "be Indigenous-led and not be undertaken by the Department of Social Services or Services Australia". This reflects our concerns about the way in which consultations have occurred in the past, and the capacity of these two departments to openly address the issues.

Departmental approach

The significant weakness of policy making within these two departments has been clearly seen in the hearings of the Royal Commission into the Robodebt Scheme. We consider that this weakness has extended more widely, including with respect to Income Management. A culture of defence and promotion of the program has become deeply embedded, along with a failure to critically assess its actual impact or consider alternatives.

The approach of the departments can be seen in a few examples:

- The way in which they continue to portray and promote income management on their websites, including the example cited earlier.
- Their continued policy of not publishing data such as the Indigenous composition of program participants.
- The way in which they continue to selectively present the evaluation findings on their website https://www.dss.gov.au/families-and-children-programmes-services-welfare-conditionality-income-management/income-management-evaluations to spin any 'positive' findings, without qualification, and neglect those which identify substantive issues. Furthermore:
  - There is no mention of, or links to, the Auditor-Generals' reports on the inadequacies of a number of the evaluations, or to the broader body of work on the assessment of these evaluations (see Bray 2016).
  - There is no reference to the Centre for International Economics cost-benefit study of the CDC which was commissioned by DSS following the Auditor-General Report No 1 2018–19, notwithstanding that the Auditor-General refers extensively to "the final report dated 20 September 2021" in Auditor-General Report No. 29 2021–22. It would appear likely that the non-publication of the report and the department's view that the findings were 'of very limited value' (Auditor-General 2022, 65) is related to the finding: "Despite uncertainty

around benefit estimates, the core conclusion that the benefits of the CDC are outweighed by the costs appears to be robust" (p. 65).

- The unbalanced and distorted summary of the evidence on Income Management in the 2022 publication "Reforming the Cashless Debit Card and Income Management". (This is briefly addressed in Attachment A.)

The limited perspective of the department is also seen in the 'Impact Analysis Executive Summary' part of the Explanatory Memorandum:

> The Government made an election commitment to abolish the CDC program and consult with communities about alternative options to support individuals and communities including options for voluntary IM.
>
> In supporting the Government's implementation of this commitment, the Department of Social Services (the Department) has considered 2 options regarding the future of welfare quarantining.
>
> The first option, for purpose of comparison, maintains the status quo, and continues a CDC program that has not demonstrated an ability to achieve its policy outcomes and places a regulatory burden on participants, businesses and communities due to geographical location and places barriers in relation to undertaking simple financial transactions. The CDC program assumes all people in a particular geography, in receipt of working age income support payments, need restrictions on the types of goods and services that can be purchased with their money.
>
> The preferred option is Option 2 where the CDC program is abolished and reforms are made to IM to enable a greater level of community decision-making. Transitional arrangements including support services would assist those who choose to leave the programs. Option 2 complements the Government's strategic priority to give people on these programs more choice on how they spend their income support payments. It will also provide greater value for money given the lack of evidence that the programs are meeting their objectives.

We find it incredible that the first option considered by the department to an election commitment to abolish a program is to continue it, leaving the only other option the introduction of this 'enhanced IM regime". There are clearly a much wider range of options available which do not involve this initiative which seeks to prolong income management in its current compulsory form.

Consultations

The Centre for Excellence in Child and Family Welfare (2017) in their "Income Management Discussion Paper" summarise the state of consultations with regard to income management as:

> Consultation is often a technocratic exercise that does not meaningfully engage members of the community for their opinion and insight. Consultations have often been lacking transparency and opportunities for the general public to participate (p. 6)

This is a perspective which we have heard repeatedly in our work and with which we would not argue. In particular it has been put to us that rather than being consultations about what the community wanted and how policies could be implemented these 'consultations' were rather presentations about what the government intended to do. In addition to this past performance of the departments in 'consultations', reflecting the above discussion, we have concerns that their longstanding commitment to these policies has gone well beyond the role of serving governments and has become a very clear pursuit of a particular agenda[6].

We would also suggest that the consultations be underpinned by the provision of an accurate summary of the findings from evaluations and other research with regard to the impact of income management. We would propose that an independent reviewer be engaged to undertake a systematic review of this material, working with an expert reference panel, to produce both a detailed assessment of the impact, and a short easy to read summary appropriate for wider dissemination.

Most importantly as a policy which predominantly impacts Indigenous Australians, the consultations should be led by Indigenous people to ensure the participants and communities have their voice listened to, and not filtered through the perspective of non-Indigenous bureaucrats.

[6] The Auditor-General reported in 2018 on a number of quite inadequate approaches by the Department in their provision of briefing to the Minister – clearly with a twist to make the program performance look better than it was (Auditor-General 2018, 44-45).

Attachment A: Reviewing the Department of Social Services summarisation of the evidence on income management.

Background

The Department produced a document "Reforming the Cashless Debit Card and Income Management" in October 2022 (DSS 2022)[7]. In addition to a discussion of policy options the document provides the department's summaries of the evidence base derived from evaluation studies. These are considered below. In each case the italicised text is taken from the document.

Income Management

Income Management evidence

Between 2010 and 2019, seven evaluations of IM have been undertaken or commissioned by the Department. Evaluations for the most part, have been region based and considered compulsory and voluntary income management models. Findings across evaluations have been relatively consistent and included both positive and negative findings….

The New Income Management in the Northern Territory: First Evaluation Report, by the University of New South Wales Social Policy and Research Centre, was released in 2012. The evaluation found few indicators of strong or consistent impacts of IM, rather, they found there have been diverse outcomes that affect a wide range of people and inconsistent range of views and experiences. First Nations people subject to IM reported strong perceptions to improvements in the wellbeing of children in their community and ability to afford food. Amongst First Nations people, 59 per cent on voluntary IM felt that IM had made things better, compared to 36 per cent on compulsory IM. Consistent with the First Evaluation Report the other evaluations found perceived improvements to access to children's clothing and education, decreased crime rates, reduced opportunities for humbugging and reduced access to alcohol and tobacco. (DSS 2022, 18)

This reporting can only be considered to be a deliberate attempt to mislead.

In the first instance it only cites the first of the SPRC-led consortium reports in New Income Management in the Northern Territory (NIM), that is the initial interim report (Bray et al 2012), and fails to make mention or cite the final report based upon the completed evaluation which concluded:

> The evaluation data does not provide evidence of income management having improved the outcomes that it was intending to have an impact upon. Indeed, rather than promoting independence and the building of skills and capabilities, New Income Management in the Northern Territory appears to have encouraged increasing dependence upon the welfare system (Bray et al 2014, xxii)

More specifically the cited findings misrepresent what was reported. Specifically the evaluation in the first report, while noting the perceptions of some gains, went on to provide more detailed

[7] Available at https://oia.pmc.gov.au/sites/default/files/posts/2022/10/Regulation%20Impact%20Statement_1.pdf

analysis of these perceptions relative to actual changes in outcomes. From this it concluded: “For Indigenous people on income management there is a clear tendency for the perceived change to be substantially larger than their actual change in outcome” (Bray et al 2012, 195). The evaluation then cited other research which found that this was the case. This included the 2011 evaluation of the NTER which had been commissioned by the Department: “the NTER evaluation found that participants in NTER communities had much more positive views about the effects of the NTER in relation to factors such as school attendance than were actually reflected in the rates of school attendance” (p 196).

- For the department to cite only the perceptions without any reference to the fact that this was presented as part of a discussion which compared these with other results and where the evaluation found that these did not accurately reflect actual outcomes, is highly selective leaves the reader with an erroneous understanding of the evaluation findings.[8]
- More generally the finding reported about the divergence of perceived change and actual change raises very significant doubts about the value of a number of other studies (including the CDC as discussed below) which have heavily relied upon this methodology and failed to use objective data.

The question of outcomes was examined much more comprehensively in the second evaluation report, which as noted above is completely omitted from the departmental summary. For example:

- Using detailed longitudinal analysis with a control population, the evaluation found that amongst those on compulsory income management there was no statistically significant change, over the two year period of income management studied, in the incidence of problems for families with regard to alcohol, drugs and gambling, when these were analysed individually, and that although there was a statistically significant improvement in the extent to which any one of these was a “problem”, that this was not sustained for the analysis of whether the family had a “very big” problem, and indeed the sign of this was negative (Bray et al 2014, 185). Again within this group statistically significant negative movements – that is an increase in problems – were identified in terms of children in the community attending school, being looked after properly, and at the community level of “hassling for money” (p. 186). Looking at the incidence of financial problems in the past four weeks the evaluation found that while there were gains reported in terms of running out of money for food, paying bills and problems because of giving money to others, only the last of these was statistically significant, and in policy terms needs to be balanced against the other item in the scale which was not having to ask others for money for essentials. Here the evaluation found a statistically significant increasing incidence of the

[8] The department’s approach here can only be considered to be a deliberate attempt to misrepresent the findings.

The preceding text to the table from which the data is drawn states: “While questions about perceptions of change can provide a valuable insight into what has occurred, it also needs to be recognised that reported perceptions can at times be fallible and may reflect more general issues of outlook or other changes in the environment in which people live. In this study this can be tested by comparing the responses to the questions on change in the incidence of running out of money to purchase food with the extent people felt it had become easier or harder to have enough money for food. This is demonstrated in Figure 10-1 which shows, for a range of population subgroups, the rate of reported net improvement with respect to whether they ran out of money for food (Table 10-5) with the net change in their perception of whether it was easier to have enough money for food (Table 10-7)” (Bray et al 2012 194-195) This was then followed on by further discussion of the limitations of perceived change, including reference to earlier findings from other studies.

problem. That is while these compulsory participants reported being humbugged less, they themselves actually humbugged more.

- The evaluation also (pages 209-235) examined a wide range of indicators relating to education, child health and well-being, crime and alcohol and concluded: "When the data are taken as a whole, not only does it suggest that there has been very little progress in addressing many of the substantial disadvantages faced by many people in the Northern Territory, but it also suggests that there is no evidence of changes in aggregate outcomes that can plausibly be linked to income management" (p. 235).[9]
- The evaluation reported from a detailed analysis of spending across a network of remote stores, that relative to levels of income management in these communities over time "the evaluation could not identify any change in the tobacco sales which can be attributed to income management" (p. 147). In looking at community wide data, it cited ABS data which showed no decrease in the self-reported rate of smoking or risky drinking by Indigenous adults in the Northern Territory between 2004-05 and 2012-13[10].

This summary also neglects to mention the evaluation of Place Based Income Management (PBIM) which was conducted by Deloitte. This was the only other evaluation which utilised a robust longitudinal approach. Key findings (Deloitte 2015) included:

> … for VIM [Voluntary Income Management], participation in PBIM had a significant and positive impact on financial management capability. For example, over time, VIM customers were significantly less likely to run out of money before payday or have enough money to pay rent or mortgages. Further, VIM participants improved their confidence in both saving and spending over time. Such improvements were not noted for surveyed VULN [Vulnerable Income Management] customers over time …
>
> The longitudinal survey did not find sustained, significant impacts on self-reports of smoking, drinking or gambling habits across any of the measures. (p. 56)
>
> the longitudinal survey did not find evidence of any direct improvements in the care or education of children for participants on any measure' (p. iv)

So returning to the claims in the Departmental summary:

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9 This and related and updated data was again reviewed in Bray (2020) which concluded:
"if the program has achieved its objectives it would be expected that there would be a range of improved outcomes across a number of domains including with respect to child health and wellbeing and education, in terms of risky alcohol consumption and in anti-social activity including criminality.
As has been presented in the preceding sections there is an absence of evidence of any such gains. In fact there been negative trends in a number of key outcomes for Indigenous people living in the Northern Territory including infant mortality, low birthweight children, injury deaths, substantiated child abuse and neglect notifications, and school attendance. Furthermore where there have been some gains, for example educational achievement as measured by NAPLAN results, these have been well below those recorded by Indigenous children living in other locations which have not been subject to income management" (p.39)

10 Bray (2020, 32) notes that there is some debate about the quality of the ABS NATSISS data from which this is derived.

- *improvements to access to children's clothing and education*: Evidence: (NIM) No improvements in actual levels of school attendance. (PBIM) No evidence of improvement in care or education of children.
- *decreased crime rates*. Evidence: (NIM) No change in crime rates and increasing rates of imprisonment of Indigenous persons in the Northern Territory.
- *reduced opportunities for humbugging*: Evidence: (NIM) Evidence of worsening at community level reported by those on compulsory income management, while at the individual level this group reported a decrease in being subject to humbugging, but an increase in their own humbugging.
- *reduced access to alcohol and tobacco*. Evidence: (NIM) No association between level of income management and tobacco spending in remote stores, no statistically significant decrease in alcohol as a problem for families for those on compulsory income management, trend sales of alcohol declined consistent with trends established before introduction of any income management. (PBIM) No improvements in self-reported smoking, drinking or gambling.

The DSS "Reforming the Cashless Debit Card and Income Management" summarises the findings of evaluation of the Cashless Debit Card as follows:

Cashless Debit Card evidence

Evaluations of the CDC program have reported both positive and negative findings. Reviewing previous evaluation activities, the ANAO audit report found that while the Department's administrative oversight of the CDC program is largely effective, the Department was not able to demonstrate that the CDC program is meeting its intended objectives.

The second impact evaluation of the CDC in Ceduna, East Kimberley and the Goldfields Region was undertaken by the University of Adelaide. It commenced in November 2018 and was released in February 2021. The evaluation found evidence of reductions in alcohol consumption and gambling, and suggestions of a reduction in the use of illicit drugs.

Twenty five per cent of surveyed CDC participants who reported they drink alcohol reported reducing the amount they drink at any one time, and 22 per cent reported reducing the number of times they drink. Twenty one per cent of survey respondents reported a positive change in gambling behaviours for either themselves, family, friends or the community where they live. The report did not find any clear effect on child welfare. Forty six per cent of CDC participants reported they did not drink at all, either before or after they were put on the card. The evaluation also found that CDC participants reported experiences of stigma and discrimination. Of those surveyed 74 per cent of CDC participants wanted to opt out, although the majority of survey respondents (made up of stakeholders and participants) supported the continuation of the CDC in some form.

The evaluators noted that analysis had been constrained by limitations of available data. The evaluators noted that a range of programs and policies impact on outcomes in CDC regions, making it more complicated to attribute impacts to the CDC.

These findings of the second impact evaluation, including data limitations, were consistent with those of the first impact evaluation undertaken by ORIMA Research on the CDC in the Ceduna and East Kimberley regions.

Feedback from consultations are that some people are finding ways around the card's restrictions to continue purchasing drugs or alcohol or to gamble. Examples include people finding a merchant who is prepared to overcharge for a product and provide cash back to the CDC participant. There are also anecdotal reports of people bartering with the card, by purchasing unrestricted goods such as groceries for a person who then pays them cash in return. These activities are hard to identify, and reports of people successfully applying workarounds to access cash have continued over the life of the programs.

With regard to the CDC and the initial ORIMA evaluation, the Auditor-General reported that "The Department of Social Services largely established appropriate arrangements to implement the Cashless Debit Card Trial, however, its approach to monitoring and evaluation was inadequate" (Auditor-General 2018, 8). This was further detailed as:

> Arrangements to monitor and evaluate the trial were in place although key activities were not undertaken or fully effective, and the level of unrestricted cash available in the community was not effectively monitored. Social Services established relevant and mostly reliable key performance indicators, but they did not cover some operational aspects of the trial such as efficiency, including cost. There was a lack of robustness in data collection and the department's evaluation did not make use of all available administrative data to measure the impact of the trial including any change in social harm. (p. 32)

We detailed in our submission of 21 September 2017 to the Senate Standing Committee on Community Affairs: Inquiry – Social Services Legislation Amendment (Cashless Debit Card) Bill 2017 (Gray and Bray 2017), a number of specific criticisms of this project. These included: the lack of baseline data and a proper control population; the interviewing approach including the demand to see government identification papers; the confounding of several waves of population data which effectively rendered change in time data unusable; non-analysis of the apparent out-migration of some income support recipients; and the highly limited use of independent administrative data. In this latter regard we reported that while ORIMA had cited in some detail in a preliminary report SA police data indicating a decline in crime, in the final report when more comprehensive data was available, the evaluators simply sought to summarise this as: "the administrative data available in relation to the levels of criminal activity across the two Trial sites generally did not show evidence of a reduction in crime" (ORIMA 2017, 61) and sought to attribute this result to limitations with the crime data. We also cited the work of other researchers who have critiqued the evaluation. More generally we note that this study relied heavily on the type of perceived change questions which had been identified as highly problematic in the NIM evaluation.

The Auditor-General (2018), in addition to identifying faults in the evaluation approach, also provided the results of their own analysis drawing upon independent administrative data from a number of sources. This indicated that a number of the claims from this evaluation and in departmental advice were not robust. The Auditor-General specifically found that

- falls in alcohol related pickups were part of a longer term trend and not a program-specific outcome;
- ambulance pick-ups had actually increased rather than decreased; and

- school attendance by Indigenous children had fallen rather than increased (p.45)

The second study of the CDC, undertaken by the University of Adelaide, has also been reviewed by the Auditor-General. The result of this was a recommendation that the "Department of Social Services undertakes an external review of the second impact evaluation of the CDC" (Auditor-General 2022, 62). The Department disagreed with this indicating: "The author of the second impact evaluation, the University of Adelaide, the department and the ANAO have acknowledged the significant limitations of the evaluation due to availability of robust data, including data held by the state and territory governments" (p.62). This departmental response however avoided commenting on the more important role of such an external review which is to allow for the review of the techniques used in the analysis and the extent to which the conclusions reported can be effectively sustained from the analysis. Given the methodological critiques of the report this is a major omission, in particular as the department continues to cite particular findings as indicative of the policy's impacts.

More specifically the Auditor-General reported:

> 4.25 The University of Adelaide made reference in its evaluation report to methodological limitations affecting the ability to draw conclusions about impact. These included: behaviours subject to strong social acceptability reporting biases; lack of experimental design in the trials; no quantitative survey of stakeholders and the broader non-CDC population; longer-term outcomes being assessed in a short study timeframe; community data limitations; concurrent CDC policies and initiatives making it difficult to identify whether it was the CDC that drove any observed changes; and lack of generalisability of the findings due to extensive use of qualitative methodologies. The evaluation report also stated that a challenge of the second evaluation was to gain the trust of CDC participants and stakeholders.
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> 4.26 The ANAO also notes that in addition to social acceptability bias identified by the evaluators, participants were asked to recall their behaviours and attitudes prior to the introduction of the CDC, as well as reporting their current behaviours. This reliance on memory is subject to recall bias. A range of data sources including alcohol sales, emergency hospital presentations and wastewater monitoring were not used in the second evaluation at an aggregated level. (p. 59)

The Auditor-General in this report also made reference to the unpublished cost benefit analysis undertaken by The Centre for International Economics which it reported " concluded that 'Despite uncertainty around benefit estimates, the core conclusion that the benefits of the CDC are outweighed by the costs appears to be robust'" (p.65). The Department has to date failed to publish this report.

We also would strongly critique the University of Adelaide study.[11] A core issue is the heavy reliance on retrospective change questions to draw its conclusions. As we detail above these are not robust

[11] Here we only document a few of the issues we identify. In general, we consider that the evaluation failed to utilise the full range of data available to it, and while ostensibly mixed methods, did not well integrate the qualitative and quantitative data and indeed often appeared to overly favour the qualitative where this could not be sustained on the basis of the quantitative. In this regard we would note specifically that the usual

and this had been well established and documented prior to this evaluation. This is a particular problem for a number of their major conclusions on the incidence of social harm – including the claim that they had "consistent and clear evidence that alcohol consumption had reduced" (Mavromaras et al 2021, 65), in particular in the light of the conclusion that "The qualitative research uncovered little consensus as to whether the CDC is fulfilling its intended aim of reducing the social harm caused by alcohol misuse" (p. 62).[12]

We also note that, while the chapter this is reported in was headed "Perceived Impacts of the Cashless Debit Card", in the wording of the report these perceptions had become evidentiary facts. Similarly while the researchers qualify this data early in their report as, "The accuracy of statements made by respondents has not been independently verified because the in depth interviews sought to gain an understanding of respondents' perceptions" (p. 19), they fail to do so when drawing conclusions.

The evaluation only made use of very limited independent data, with the report only including crime statistics for the Goldfields and East Kimberly. This showed marked, statistically significant, increases in crime, especially domestic violence in East Kimberly over the period of the operation of the CDC, and a statistically significant increase in domestic violence in the Goldfields (p. 120). In this section the evaluation went on to say "Notably, the present report does not include figures for Police outcomes in Ceduna and surrounds because no significant impacts were detected for any of the offence types" (p120). This we contend is a fundamental failure of the evaluation and breaches accepted academic practice – a null finding is just as meaningful as a finding of change – even more so when the policy which is being evaluated is designed to achieve change.

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collective presentation of 'stakeholder' views did not reflect the varying interests of the stakeholders, their actual knowledge of what had occurred, and the impact this had on their responses.

[12] While the evaluation also collected information on levels of reported alcohol consumption before and after the introduction of the CDC they do not report this on the basis of "It is widely recognised that any observed change over time that is measured this way will contain the individual impact of the CDC policy, but it will also contain the individual (and possibly independent of the CDC) impacts of other concurrent policies, as well as their possible interactions with the CDC policy" (p. 55). This rationale appears to be odd since this equally applies to reported change. Furthermore with regard to social desirability bias responses, while the two question approach is likely to net out much of the effect, the single question (which only itemised positive responses) will contain the full effect.

Some data is provided on this type of before and after basis from other questions. This indicated, for example, an increase in the use of illicit drugs from 6 per cent to 11 per cent (p. 70), and a balance of 15.6 percentage points to 8.5 percentage points in the proportion of people on the measure with worsening financial circumstances (p. 86). We further note that in the analysis presented in the report some of the major conclusions appear to be drawn from analysis which uses these questions to categorise people into those with poorer or better circumstances before and then looks at change. Caution needs to exercised with such an asymmetrical approach as with 'noisy' data this can capture regression toward the mean.

References

AIHW (Australian Institute of Health and Welfare). 2018. *Children's Headline Indicators.* (cat no CWS64). Viewed 16 April 2020, https://www.aihw.gov.au/reports/childrenyouth/ childrens-headline-indicators

Auditor-General. 2018. *The Implementation and Performance of the Cashless Debit Card Trial Auditor-General Report No.1 2018–19*. Canberra: Australian National Audit Office.

Auditor-General. 2022. *The Implementation and Performance of the Cashless Debit Card Trial – Follow-on. Auditor-General Report No.29 2021–22.* Canberra: Australian National Audit Office.

Australian Labor Party.2021. *ALP National Platform: As adopted at the 2021 Special Platform Conference*. https://alp.org.au/media/2594/2021-alp-national-platform-final-endorsed-platform.pdf

Bray, J. Rob, Matthew Gray, Kelly Hand and Ilan Katz. 2014*. Evaluating New Income Management in the Northern Territory: Final Evaluation Report* (SPRC Report 25/2014). Sydney: Social Policy Research Centre, UNSW Australia.

Bray, J. Rob, Matthew Gray, Kelly Hand, Bruce Bradbury, Christine Eastman and Ilan Katz. 2012. *Evaluating New Income Management in the Northern Territory: First Evaluation Report*. Sydney: Social Policy Research Centre, UNSW Australia.

Bray, J. Rob. 2016. *Income Management Evaluations -- What do we know? Placing the findings of the Evaluation of New Income Management in the Northern Territory in context*. CAEPR Working Paper 11/2016). Canberra: Centre for Aboriginal Economic Policy Research, Australian National University. http://caepr.anu.edu.au/Publications/WP/2016WP111.php

Bray, J. Rob. 2020. *Measuring the social impact of income management in the Northern Territory*. CAEPR Working Paper 136/2020). Canberra: Centre for Aboriginal Economic Policy Research, Australian National University https://caepr.cass.anu.edu.au/sites/default/files/docs/2020/7/CAEPR_WP_no_136_2020_Bray_0.pdf

Burney, Linda. 2020. *Speech re: Social Security (Administration) Amendment (Continuation of Cashless Welfare) Bill 2020, 12 November 2020*. Hansard: House of Representatives.

Centre for Excellence in Child and Family Welfare. 2017. *Income Management Discussion Paper, July 2017*. Melbourne: Centre for Excellence in Child and Family Welfare.

Cobb-Clark, Deborah A. Nathan Kettlewell, Stefanie Schurer, Sven Silburn. 2021. "The Effect of Quarantining Welfare on School Attendance in Indigenous Communities". *Journal of Human Resources,* Sep. 2021, 1218-9909R2; DOI: 10.3368/jhr.1218-9909R2

Delloite. 2015b. *Consolidated place based income management evaluation report 2012–2015*. Barton (ACT): Deloitte Access Economics

Doyle, Mary-Alice, Stefanie Schurer and Sven Silburn. 2022."Unintended consequences of welfare reform: Evidence from birthweight of Aboriginal children in Australia." *Journal of Health Economics*, Volume 84.

DSS (Department of Social Services). 2022. *Reforming the Cashless Debit Card and Income Management*. Canberra: Department of Social Services.

DSS (Department of Social Services). 2023. *Income Management* (webpage). https://www.dss.gov.au/our-responsibilities/families-and-children/programmes-services/family-finance/income-management

FRC (Family Responsibilities Commission). 2022. *Annual Report 2021-22*. Cairns: Family Responsibilities Commission.

Goldstein, Rebecca and Michael J. Hiscox. 2018. *School Enrolment and Attendance Measure Randomized Controlled Trial: Full Report April 2018*. https://www.niaa.gov.au/sites/default/files/publications/seam-report-2018.pdf

Gray, Matthew and J Rob Bray.2017. *Senate Standing Committee on Community Affairs: Inquiry – Social Services Legislation Amendment (Cashless Debit Card) Bill 2017: Submission*.

https://www.aph.gov.au/DocumentStore.ashx?id=98805b4c-9f2f-44ef-973a-63ba4979e6b3&subId=561479

Gray, Matthew and J Rob Bray. 2018. *Senate Standing Committee on Community Affairs: Inquiry: Social Services Legislation Amendment (Cashless Debit Card Trial Expansion) Bill 2018 Submission*. https://www.aph.gov.au/DocumentStore.ashx?id=8b4f5134-0c5b-4910-98ee-0a4e1f5efa95&subId=658059

Mavromaras, Kostas, Megan Moskos, Stéphane Mahuteau and Linda Isherwood. 2021. *Evaluation of the Cashless Debit Card in Ceduna, East Kimberley and the Goldfields Region – Consolidated Report*. Adelaide: Future of Employment and Skills Research Centre, University of Adelaide.

NT Department of Education. 2023. *2022 enrolment and attendance statistics*. https://education.nt.gov.au/__data/assets/pdf_file/0008/1214792/e-and-a-web-2022-table-3.pdf

ORIMA. 2017. *Cashless Debit Card Trial Evaluation – Final Evaluation Report, August 2017*.

Parliamentary Joint Committee on Human Rights. 2016. *Review of Stronger Futures Measures, 16 March 2016*. https://www.aph.gov.au/-/media/Committees/Senate/committee/humanrights_ctte/inquiries/stronger_futures_2/Final_report/2016_Review_of_Stronger_Futures_measures.pdf?la=en&hash=35F698B74D855DD56FCB5F2710C74679A4D06AD3

Rishworth, Amanda. 2023. *Second Reading Speech: Social Security (Administration) Amendment (Income Management Reform) Bill 2023, 9 March 2023*. Hansard: House of Representatives.

Venn, Danielle, Nicholas Biddle and Will Sanders. 2020. *Trends in social security receipt among Indigenous Australians: Evidence from household surveys 1994–2015*. CAEPR Working Paper no. 135. Canberra: Centre for Aboriginal Economic Policy Research, ANU.