



Women
With
Disabilities
Australia
(WWDA)

Winner, National Human Rights Award 2001
Winner, National Violence Prevention Award 1999
Winner, Tasmanian Women's Safety Award 2008
Certificate of Merit, Australian Crime & Violence Prevention Awards 2008
Nominee, UNESCO Prize for Digital Empowerment of Persons with Disabilities 2020
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Nominee, UN Millennium Peace Prize for Women 2000

Committee Secretary
Senate Standing Committees on Community Affairs

PO Box 6100
Parliament House
Canberra ACT 2600

Sent by email: community.affairs.sen@aph.gov.au

22nd July 2021

To the Senate Standing Committees on Community Affairs.

Thank you for the opportunity to respond to the Senate Standing Committee on Community Affairs inquiry into the *'Purpose, intent and adequacy of the Disability Support Pension'*.¹ While unfortunately, due to capacity limitations, Women With Disabilities Australia was not able to respond to the inquiry at length, we have taken this opportunity to outline some of the concerns of our members in this brief letter.

As you would likely be aware, WWDA is the only national Organisation of People with Disabilities (OPD)² specifically for women, girls, feminine identifying and non-binary people with disability in Australia. WWDA is managed and run by women and non-binary people with disability and has affiliate organisations and networks of women with disability in most States and Territories of Australia. Consistent with our other submissions, this letter uses the term 'women and girls with disability', on the understanding that the term is inclusive and supportive of, women and girls with disability along with feminine identifying and non-binary people with disability in Australia.

As there remains a significant lack of disaggregated data, research and information on the economic situation of women and girls with disability in Australia, WWDA has drawn from the experiences of our members to inform this letter. In addition to external research

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evidence, this letter includes direct quotes from de-identified disabled women; who are either DSP recipients or have applied to access the DSP, but not been successful.

Broadly, while the DSP was introduced to provide financial support to working age Australians who have a permanent physical, intellectual, or psychiatric impairment that prevents or limits their capacity to engage in employment;³ 15 years of reforms to the DSP, by successive Federal Governments, have resulted in a DSP that is out of reach to many people with disability who are unable to financially support themselves to their impairment/s.⁴ In this letter, we outline some of the reasons that the DSP has not been effective in supporting the financial independence and welfare of women, feminine identifying and non-binary people with disability in Australia.

Throughout the letter, we also highlight how the failure of the DSP to adequately support people with disability, undermines Australia's human rights obligations, as a signatory to United Nations instruments such as the Convention on the Rights of Persons with Disabilities (CRPD) and the Covenant on Economic, Social and Cultural Rights (CESCR).

1. Restrictive Eligibility

While WWDA understands that the DSP must be restricted to certain cohorts for sustainability purposes; countless anecdotes from women with disability have told us that the current eligibility criteria for the DSP restricts many individuals from accessing income support they have a right to. Under the CRPD Article 28 for instance, it is emphasised that persons with disability have a right to an adequate standard of living and social protection.

Article 28 2(b) specifically refers to the obligations of state parties "to ensure access by persons with disabilities, in particular women and girls with disabilities and older persons with disabilities, to social protection programmes and poverty reduction programmes."⁵

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In 2019, the *Committee on the Rights of Persons with Disabilities*, in its concluding observations⁶ on the combined second and third periodic report of Australia, expressed concern that a significant proportion of people with disability in Australia live near or below the poverty line. As a means to address this, the Committee recommended a review of the eligibility restrictions for the DSP and stated that the rate of government income support payments was inadequate to ensure an adequate standard of living for people with disability. However, despite these observations, the eligibility for and rate of DSP in relation to indexation, has not yet changed.

a) A condition must be diagnosed, treated and stabilised

Under current DSP eligibility requirements, a person applying for the DSP must have a condition that has been diagnosed and treated by a medical professional; and needs to be 'stabilised.' Like the National Disability Insurance Scheme, this means that individuals accessing the DSP must have a permanent condition that will not improve or with further treatment.⁷

To prove these criteria, women with disability report needing to book multiple appointments with multiple treating specialists; which places significant financial pressures on women with disability who are applying for the DSP due to already facing financial insecurity related to their medical conditions.

In addition, people with disability are required to have reports from treating specialist that are not older than six months; which is very difficult for many women with disability. As widely reported, Australia is currently facing a significant shortage in specialist health professionals in particular areas, leading to long wait times for appointments. Additionally, having the financial capacity to cover the cost of these appointments, in a relatively short period of time, is extremely difficult for women with disability.

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The ability to gather necessary evidence for a DSP application was made significantly more difficult because of a 2016 decision to remove the Medicare item number for DSP application reports.⁸ This decision has resulted in many specialists refusing to see patients for the purpose of completing DSP applications, placing even greater financial burdens on women with disability who are already living with little to no financial security.⁹

"As someone who currently has NDIS funding but doesn't qualify for a health care card I am out of pocket for a lot of necessary medical treatments and scans and in some instances simply just have to do without some medications."

(When) "my partnership ended and I was back to having one income (a disability pension) and no support otherwise...I have large neurological bills to cover, along with my GP bills, tests and treatment that aren't subsidised."

"This is a system so complex that it took me 22 months and thousands of dollars to compile an application I was confident in, then months longer to process it. If this is what applying for the DSP looks like for someone who graduated with a Bachelor of Laws (hons) in 2018 and had parents who could afford to pay for many of those critical medical appointments, what does it look like for the less privileged in our society."

Furthermore, the requirement that a condition must be 'stabilised' restricts individuals who are experiencing long-term and severe health conditions or disabilities from being able to access the DSP if there is any room for their condition to 'improve' at an unknown stage in the future. While many disabilities are life-long; it is also common for people with disability to experience fluctuating conditions that have periods of severity, or to experience health conditions that may get better with years of treatment, but still restrict the individual from financially supporting themselves through employment, and/or meeting the activity requirements of other support payments such as Newstart or JobSeeker. As some women with disability have explained:

"I know in many cases how someone's disability affects them is either stable or may follow a steady downward trajectory. With MS it fluctuates. I can be fine for months and then 'tank' as I call it...Being

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unwell for a number of months or years. Fighting the whole time to try and reduce impairment. This is not unusual with MS."

"The definitions required for the DSP should be looked at. I'm legally blind in one eye can only read the 2nd line of sight chart. My Ophthalmologist tells me I can't work due to my sight, but not blind enough to qualify for DSP. I'm awaiting two new Corneal Grafts."

When considering that individuals in these circumstances are usually also prevented from accessing the NDIS, it is clear that this eligibility criteria should be reconsidered.

b) Participants must be means tested

While WWDA understands that the DSP must be restricted based on income, we are concerned that the current processes for means testing participants do not consider the various factors that impact an individual's financial sustainability. For example, under the current eligibility criteria, an individual whose Disability Support Pension has been suspended due to increased income from employment can restore their payment without needing to lodge a new claim for the Disability Support Pension; but only if the recipient notifies Centrelink of their change in employment circumstances within two weeks.¹⁰ While this may seem like a fair requirement, many women have reported that they were not made aware of their responsibilities to suspend their DSP payment until after gaining employment.¹¹

In the Australian Human Rights Commission paper on the experiences of people with disability in employment: *Willing To Work*, it was reported that these requirements are particularly discouraging for people with disability whose condition/s were episodic.¹² Many women with disability are concerned that if their condition/s worsen and they were unable to work, they would not be able to go back on the DSP.

"I do not think the DSP does a very good job of supporting people with chronic illnesses. Even with some capacity to earn an income. I have periods where I can work full time and then have period where I can barely function. DSP is not flexible enough to allow it as a fall-back position if you are able to work for an extended period of time in a full-time capacity."

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In addition, many members of WWDA have explained that they have been unable to access the DSP due to their partners income, regardless of whether their partner can or will support them.

"When I was diagnosed with multiple forms of disability and unable to work for many years, I looked into applying for the DSP. I was not eligible because my husband earned just over the income threshold (by approx. \$48). This placed severe financial strain on our family of four. The current eligibility criteria gatekeeps financial autonomy for women in relationships and places them dependent on their partner for survival."

"The linking of partners and subsequent reduction of DSP based on partner's income means that women especially are then put in a position of financial dependence which leaves them vulnerable."

The requirement that a DSP recipients' partner must earn under a certain income also ignores the fact that a significant proportion of DSP applicants are women who are the primarily care-givers of dependents, such as children or elderly family members.

c) Impairment/s must have a rating of 20 points or more

Under the current DSP application process, a standardised test is used to determine an individual's functional capacity. This assessment is undertaken using 'Impairment Tables.'¹³

If a person's impairment measures 20 points or more in a single impairment table, they can then move to the stage of the application process where their ability to work will be assessed. If an individual meets 20 points or more across multiple tables then they must also meet the program of support requirement. If their condition rates less than 20 points across the impairment tables, they are not eligible for the DSP.

The current impairment tables component of the DSP access process is based on the Medical Model of Disability,¹⁴ which contradicts Australia's international human rights

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obligations. While the Medical Model of Disability views disability as a 'deficit' within the individual; the Social or Human Rights Model of Disability used in human rights instruments understands that many people with disability face inequality and discrimination as a result of societal structures that are not accessible to adapted to diverse individuals. Within the parameters of the DSP eligibility, the use of the medical model not only restricts eligibility to those with diagnosis of significant disability, but also ignores inequalities based on other factors such as race, gender, location, ethnicity, first language, LGBTIQ+, or parental status. As some members have stated:

"Capability vs disability is a disastrous system- it's what the government uses now to determine DSP applications. It is unfair and for people with disabilities to have to jump through so many hoops, only to be denied or have to fight for help and funding."

"If cognitive biases occur when industry funds research, then cognitive biases occur when Governments pay Medical Practitioners to review claims for people with disabilities."

"Many girls and women, particularly who have conditions/diseases are treated poorly, belittled dehumanised and misunderstood by misogynistic medical model and outdated medical education. I know this too well through my own journey."

For women and girls with disability who have had difficulty with government personnel or medical professionals; the medical approach to determining eligibility for the DSP can also inadvertently work to further disenfranchise them from seeking help. This is particularly concerning when considering that many of WWDA's members have to apply for the DSP multiple times before they are successful.

d) Participation in a 'Program of Support'

When individuals do not meet the 20-point rating, the only alternative means of applying to the DSP is to demonstrate that they have actively engaged with a Program of Support (POS), such as a JobActive or Disability Employment Services (DES) for a minimum of 18

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months continually;¹⁵ which is an expectation usually only placed on individuals accessing Newstart or JobSeeker.

As these Programs of Support require significant and time-consuming obligations from individuals, such as applying for up to 20 jobs a month and going to appointments with providers; the expectation to participate before meeting DSP eligibility is unrealistic for people who have disabilities, chronic health conditions or caring commitments that limit their capacity to meet ongoing commitments. For many women with disability, the cost and inaccessibility of transport options can also increase the difficulty of attending physical appointments with Centrelink staff or DES providers.

"I was using a walking stick, could not yet drive myself the 40 minutes to the appointment (and) needed my husband/carer's assistance to open the office door to even enter the appointment but was still asked 'do you even want to work?' by the assessor as if my problem wasn't a medical one but an attitude one."

Concerningly, WWDA members have also reported that if they require a pause in the POS, they are marked as a 'success' within the Centrelink system and then have to restart the required 18 months of POS participation. In reports made by Centrelink to the Department of Human Services, a POS participant 'success' implies that the participant has secured employment. While this terminology may be used for the purpose of streamlining information; this reporting does not reflect common reasons that require women with disability to take a break from POS, including flare ups of chronic illness and/or experiences of abuse and violence.

"Another result of having a disability and living in impoverished circumstances is it makes you a target. In my case, a stranger attempted to attack me outside of my home in 2015 and then continued to viciously stalk me for six months."

"I left my first job because of domestic violence which brought on a flare up,"

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When combined with the requirement that recipients of the DSP are means tested based on both their own income and that of their partner, these requirements not only put women with disability at increased risk of violence, but also force women to stay in abusive and unsafe relationships.

"He was abusive around that fact that I had disability. We separated a number of times before finally divorcing, on many occasions it was not only because of physical violence but because he refused to support me financially if I was having a relapse. So I could 'stay' versus being homeless, but he would not support me at all and would expect that I should be doing all the household work because I 'wasn't working.'"

"The DSP, while means tested, should not be affected by co-habitation with a partner. My disability and its financial 'repercussions' were a huge part of the psychological, emotional and physical abuse I suffered with my ex-husband - Tying my eligibility and rate of DSP to my partner's income left me in a very vulnerable position financially as well as physically. It also validates the argument of someone with a disability being a burden to their family/partner."

"Many women with disabilities are living in domestic abuse where their carer is also their partner. The current eligibility criteria may prevent the woman accessing a means of income when their ability to access the DSP is dependent on their partner's income threshold. Partners may use financial abuse as a form of violence and control and enabling women to access the DSP in their own right may give them the means to access their own money."

Given that WWDA has, for decades, been calling on successive governments to address the disproportionate rates of violence experienced by disabled women, it is extremely concerning that even government programs fail to provide any kind of concession or understanding of the experiences of survivors of violence.

d) Mutual obligations for people with disabilities under 35

Regardless of other eligibility factors, people with disability under the age of 35 with an assessed work capacity of 8 or more hours per week are also required to participate in compulsory activities to assist them to find employment.

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Like those that do not have a disability that meets the 20-point rating criteria, under 35-year-olds must show evidence of participation in mutual obligation activities, such as submitting job applications, participating in JobActive or Disability Employment Services; which as mentioned previously, is very difficult for many women with disability.

"I'm currently being told I can work 8+ hours, but I think it's ridiculous. I have permanent conditions. I don't want to be pressured into working towards employment and getting off DSP- that's not going to work."

The expectation of finding paid employment is also often unrealistic to expect of many young people with disability, who are much less likely to be employed than their non-disabled counterparts. In a workforce where young people are increasingly competing for a diminishing share of secure employment,¹⁶ and employers are looking for the cheapest and least complex candidates, it goes without saying that young people with disability who require support and workplace accommodations are the least appealing.

2. Inadequacy of Disability Employment Services

Whilst WWDA supports initiatives that enable women with disability to find, secure and maintain meaningful employment, WWDA remains deeply concerned about the expectation that people applying for the DSP should first participate in Disability Employment Services (DES) for several reasons.

Firstly, it must be recognised that there is little evidence that DES increase the likelihood of employment for disabled individuals. A draft version of the *'Mid-term Review of the Disability Employment Services (DES) Program'* commissioned by the Australian Government and drafted by Boston Consulting Group, recently obtained under freedom of information, revealed that job service providers are unsatisfied with DES.¹⁷ The draft report stated: "providers also expressed considerable negativity towards the mutual

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obligations system overall ... considering that it does not on balance, improve the likelihood of employment;" which again, reflects the experiences of people with disability.

"I was registered with a local employment agency while on DSP looking for work, before getting my job at the local council, but ended up being advised by the agency that I would be better off applying for roles on my own."

When people with disability do get 'jobs,' it is too often unregulated, in Australian Disability Enterprises (ADEs) – or sheltered workshops - which do not provide people with disability with standard rights in the workplace, such as award wages or paid leave. When reflecting on working in an ADE, one member stated:

"I worked there for three years. It was good at first as they trained me. But it got to the point where I was supervising and training others and I still wasn't getting paid enough to live on."

Support for segregated employment for people with disability through ADEs (often referred to as 'sheltered workshops'), under the Supported Wage System in Australia, allows employers to pay people with disability lower wages than other people.¹⁸ With less than 1% of people employed in ADE's ever moving into mainstream employment;¹⁹ it needs to be considered that the requirement of participation in these mutual obligation systems is forcing people with disability into indefinite impoverishment.

3. Rate of the DSP is not adequate to cover basic living costs

Across the community and economic sector, it is widely agreed that government support pensions in Australia are grossly inadequate to cover rising living costs;²⁰ with all payment rates sitting well below the income required to stay out of poverty, no matter how it is categorised. While this is the case for all government support payments, it is particularly detrimental for women with disability, who are more likely to rely on government pensions as their main source of income²¹ and have higher costs of living.

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Although there is no gender and disability disaggregated data relating to poverty, available data demonstrates that forty-five per cent of people with a disability in Australia live in poverty, more than double the OECD average of 22%.²² 11.2% of people with disability experience deep and persistent disadvantage, more than twice that of the national prevalence.²³ This rate is also significantly higher for Aboriginal and Torres Strait Islander people with disability.

The median gross weekly personal income of people with disability is half that of people without disability.²⁴ Government systems in Australia do not recognise the significant costs of disability that women with disability incur throughout their lifetime. For example, women with disability spend more of their income on accessing accessible housing, medical care and health related expenses than women without disability,²⁵ and 61% of women with disability report that they cannot sustain the cost of their basic needs;²⁶ experiences that are all in line with stories from WWDA members. When providing feedback to WWDA on this inquiry for instance, some members explained:

"I am currently working full-time and experiencing an MS relapse. I am only just 'getting by' on my income now, with no additional funds for 'holidays' or nice 'outings.' I have had number of years of my life on the Disability Support Pension (DSP). I have also been on department of housing list for a property for 10 years after having to seek refuge for domestic violence and was never offered a was never offered a property for housing. I have spent the last 12 months in my own (accessible) home - made possible by financial settlement from divorce and a government guarantee that enabled me to use a 5% deposit. My housing and my ability to keep my dogs will be pulled from under me if I continue to be sick and have to leave work. I cannot afford to pay my mortgage on the DSP and - being a mortgage, I would not receive any additional funds for 'rent assistance.' The DSP does not provide enough money to live on."

"Many of us have the added burden of medical expenses and transport costs. We struggle to make ends meet let alone have any sort of quality of life. Not all pensioners are aged, entitled to NDIS or live-in government housing."

"I do not think that the DSP enables any quality standard of living. Does an acceptable standard of living mean that you have a roof over your head, you can pay your utilities, buy low quality, highly processed food but have few choices in your life or does it mean you actually have autonomy?"

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Throughout the COVID19 pandemic, women with disability in receipt of the DSP have faced even more difficulty meeting the costs of living. While reasons for this are varied, many have cited the decreased availability of essential items and lack of additional government support needing consideration.

"Because the government has bailed out almost all other sections of the community, supermarkets are taking by doubling their prices... but people with disability, carers and the aged are the ones disastrously affected by this. People with disability are facing up to \$60 per fortnight in delivery costs because of the scarcity of items, some unavailable and others restricted. People with disability have been massively marginalised by this government. We are NOT all in this together."

"Online food and grocery services have been cancelled in our area. Cost of food has increased 300% due to cheap brands being unavailable."

"As a single, significantly disabled parent, it is a struggle to make ends meet in normal circumstances. I am unable to leave the house without assistance, and now I am in a position where I'm unable to leave the house whatsoever. This will continue to be the case for many months to come. My expenses have increased astronomically over the last few weeks, both in terms of accessing food and essential household items, as well as receiving medical care. How is it fair that I'm receiving less money per fortnight as a disabled single parent compared to an able-bodied single parent, when my expenses are higher and unable to be reduced?"

Despite significant advocacy from DPOs and DROs, the Australian Government has refused to act on recommendations to include recipients of the DSP in the Coronavirus Supplement of \$550 per fortnight, consistent with the Jobseeker Payment and other payments announced by the Prime Minister on Sunday 22nd March 2020.

In a paper compiled by the Australian Council of Social Services in 2021, it was recommended that Australian Governments recognise that disability and illness incur additional costs, including healthcare, equipment, transport and housing costs. Referring to a report by NATSEM, ACOSS notes that "a single person with disability receiving the Disability Support Pension needs an extra \$50 per week to achieve the same standard of

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living as someone without a disability receiving a pension;²⁷ which is particularly alarming when considering that the Disability Support Pension is already higher than other support payments.

In order to support people to achieve a basic standard of living, ACOSS recommends that base rates of working age income support payments be raised to at least \$65 a day;²⁸ and that supplementary payments be provided to individuals who are more financially vulnerable, including people with disability or chronic illness and single parents.

4. Recommendations

In line with the ACOSS recommendations and reflecting Australia's obligations to safeguard and promote an adequate standard of living and social protection for people with disability, WWDA urges the Federal Government to increase the rate of each income support payment to meet the average cost of living of their recipients and to ensure that people's rights to a basic standard of living are being fulfilled.

In addition, WWDA recommends that the Australian Government review and amend the eligibility and mutual obligation requirements of the DSP to reflect Australia's Human Rights obligations under the CRPD. In particular WWDA strongly recommends that the Australian Government:

- a) Reframe the definition of disability under the DSP to reflect the Human Rights Model of Disability which recognises the social structures which discriminate against people with disability and create barriers to their full social, economic and cultural participation.
- b) Abolish or revise the eligibility tests used to access the DSP based on the Medical Model of disability, which bases support solely on medical reports from diagnosing professionals, at the exclusion of external factors.

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wwda.org.au

Ph: +61 438 535 123

PO Box 407, Lenah Valley, 7008 TASMANIA

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Nominee, French Republic's Human Rights Prize 2003
Nominee, UN Millennium Peace Prize for Women 2000

- c) Recognise and implement measures to account for compounding factors which impact on the financial vulnerability of people with disability, including, but not limited to race, gender, location, first language, LGBTIQ+, or parental status.
- d) Remove provision that excludes applicants from being eligible for the DSP based on the income of their partner.
- e) Recognise that expectations of people with disability to engage in job ready programs before or whilst accessing the DSP are unrealistic and abolish the Program of Support (POS) and mutual obligations requirements for people with disability, regardless of age or disability status.
- f) Recognise that Australian Disability Enterprises (ADEs) and other segregated models of employment as being in contravention of the CRPD and cease the continuation of any government process that endorses ADE participation.
- g) Reflecting recommendations made to Australia by the Committee on the Rights of Persons with Disabilities; develop and implement a national, time bound strategy and framework for the closure of all ADEs and segregated models of employment and provide services to transition people with disability from ADEs into open inclusive and accessible forms of employment, ensuring equal remuneration for work for equal value.
- h) Recognise the severe lack of disaggregated data and research on women and girls with disability in Australia and implement data collection tools for DSP applicants and recipients that can provide information on the economic situation of women and girls with disability in Australia.

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Additionally, WWDA recommends that any changes to the Disability Support Pension be made in close consultation and co-designed with people with disability and their representative organisations.

Thank you for taking the time to consider our feedback. We look forward to further working with the Australian Government to improve the lives of our members.

Yours sincerely

Carolyn Frohmader
Executive Director
Women With Disabilities Australia

¹ Senate Standing Committee on Community Affairs (2021) [Purpose, intent and adequacy of the Disability Support Pension](#), Parliament of Australia, Canberra.

² OPDs are organisations made up and governed by people with disability for people with disability. Women With Disabilities Australia is an OPD.

³ Australian National Audit Office (2016) [Qualifying for the Disability Support Pension](#)

⁴ Parliamentary Budget Office (2018). [Disability Support Pension: Historical and projected trends](#).

⁵ UN General Assembly (2007) [Convention on the Rights of Persons with Disabilities](#), United Nations General Assembly, A/RES/61/106.

⁶ Committee on the Rights of Persons with Disabilities (2019) [Concluding observations on the combined second and third periodic reports of Australia](#), adopted by the Committee at its 511th meeting (20 September 2019) of the 22nd session; UN Doc. CRPD/C/AUS/CO/2-3.

⁷ National Disability Insurance Agency (2019) [Access to the NDIS - The disability requirements](#)

⁸ National Social Security Rights Network (2018). [Disability Support Pension \(DSP\) Project: A snapshot of DSP client experiences of claims and assessments since the 2015 changes](#).

⁹ WWDA employment submission

¹⁰ Department of Social Services, [Guide to Social Security Law](#), [3.6.1.100]. .

¹¹ Australian Human Rights Commission (2016) [Willing to Work: National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability](#).

¹² Ibid.

¹³ Australian National Audit Office (2016) [Qualifying for the Disability Support Pension](#).

¹⁴ Dowse, L., Soldatic, K., Didi, A., Frohmader, C. and van Toorn, G. (2013) [Stop the Violence: Addressing Violence Against Women and Girls with Disabilities in Australia. Background Paper](#). Hobart: Women with Disabilities Australia. See also: Women with Disabilities Australia, People

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with Disability Australia, University of New South Wales (2013) [Report of the Outcomes and Proceedings of the National Symposium on Violence Against Women and Girls with Disabilities](#).

WWDA, Hobart, Tasmania.

¹⁵ National Centre for Social and Economic Modelling (2019). [Inequalities in standards of living: evidence for improved income support for people with disability](#).

¹⁶ National Youth Commission (2019) [Position Vacant? Youth Employment in Australia](#).

¹⁷ Henriques-Gomes, L (2021) ['Australia's welfare mutual obligations do not improve likelihood of employment, job agencies say.'](#) The Guardian Australia, Sydney.

¹⁸ The [Supported Wage System](#) is a process that allows employers to pay a productivity-based wage for people with disability that matches an independently assessed productivity rate.

¹⁹ Women with Disabilities Australia (WWDA) (2020). ['Response to the Employment Issues Paper of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability'](#). August 2020. WWDA: Hobart, Tasmania, p. 22

²⁰ E.g. See: Martin, P (2020) 'Top economists want JobSeeker boosted \$100+ per week, tied to wages,' The Conversation, Australia; Coates, B & Cowgill, M (2021) [The JobSeeker rise isn't enough: Submission to the Senate Standing Committee on Community Affairs](#), The Grattan Institute; Australian Council of Social Services (2021) [Social Services Legislation Amendment \(Strengthening Income Support\) Bill 2021](#)

²¹ Australian Institute of Health and Welfare 2017. Australia's welfare 2017. Australia's welfare series no. 13. AUS 214. Canberra: AIHW.

²² Price Waterhouse Coopers (PWC) (2011) [Disability expectations: Investing in a better life, a stronger Australia](#).

²³ Australian Institute of Health and Welfare 2017. [Australia's welfare 2017](#). Australia's welfare series no. 13. AUS 214. Canberra: AIHW.

²⁴ Australian Government (2016) National Disability Strategy 2010-2020: Progress Report to COAG.

²⁵ Salthouse, S. & Howe, K. (2004) Lack of Data Means Lack of Action - A clinical examination of access to health services for women with disabilities. A paper presented on behalf of Women With Disabilities Australia (WWDA) to the Human Rights and Equal Opportunity Commission (HREOC) National Summit: 'Access to Health Services for People with Disabilities'. Sydney, 28 May 2004.

²⁶ Australian NGO CRPD Shadow Report Coordinating Committee (2019) Findings from the National CRPD Survey.

²⁷ Australian Council of Social Services (2021) [Social Services Legislation Amendment \(Strengthening Income Support\) Bill 2021](#), p. 7

²⁸ Australian Council of Social Services (2021) [Social Services Legislation Amendment \(Strengthening Income Support\) Bill 2021](#), p. 4

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