



Tax White Paper Task Force  
The Treasury  
Langton Crescent  
PARKES ACT 2600

Dear Sir/Madam

Carers Australia welcomes the opportunity to comment on the Tax Discussion Paper as it relates to the treatment of retirement income.

Carers Australia is the national peak body representing the diversity of Australians who provide unpaid care and support to family members and friends with a disability, mental illness, chronic condition, terminal illness, drug or alcohol problem, or those who are frail aged.

There are over 2.7 million carers in Australia, many of whom face protracted periods out of the workforce to care, during which their capacity to save for retirement is significantly reduced. For many carers the notion of 'retirement' simply doesn't exist, their role is lifelong and dominated by financial uncertainty and poverty.

In this submission Carers Australia argues that the current retirement income system disadvantages carers. We support the recommendations of many others in the sector to create a fairer system in which there is equity in superannuation concessions and consideration of those with broken careers and those who face involuntary retirement. Carers Australia also calls for an adequate safety net for people reliant on government support and for improved transitions from income support into mature age employment.

Yours sincerely

A handwritten signature in black ink that reads "A Cresswell".

ARA CRESSWELL  
Chief Executive Officer

24 July 2015



**Carers Australia**  
**Submission to the Government's retirement incomes review**

**July 2015**

# Carers Australia Submission to the Retirement Incomes Review

Carers Australia is the national peak body representing the diversity of Australians who provide unpaid care and support to family members and friends with a disability, mental illness, chronic condition, terminal illness, drug or alcohol problem, or those who are frail aged.

Carers Australia shares the view of a wide range of expert bodies, including the Productivity Commission, ACOSS, COTA and Anglicare Australia that there needs to be a comprehensive and holistic review of retirement incomes in Australia. While many sensible changes can be made at the margins, the Australian Government cannot arrive at fair, efficient and sustainable arrangements without considering tax rules as they apply to income derived from all sources, including superannuation.

## Background on family and friend carers

### Who cares?

#### Women are more likely to take on caring responsibilities

In 2012, 56.1 per cent of all carers were female. When we look at primary carers (those who provide the most substantial amount of care to another individual) the gender disparity is even starker, with 70 per cent of all primary carers being female.<sup>1</sup>

It is not surprising then, that female carers are also over-represented amongst recipients of both the Carer Payment and the Carer Allowance, (70 and 73 per cent respectively)<sup>2</sup>.

#### Caring in the prime working (and saving) years

Nearly 40 per cent of all carers are between the prime working ages of 45-64 years, and the ratio is even higher for female carers at 46.2 per cent.<sup>3</sup> The need to drop out of the workforce to care during a time when many individuals would normally have their greatest earning potential (and capacity to contribute to superannuation), means a lost opportunity for retirement saving.

#### Family members who have the lowest earning potential or who are already out of work are more likely to become carers

When families make choices about who will take on caring responsibilities, it often comes down to an economical decision- who earns less?<sup>4</sup>

#### What we know:

- About half of people receiving Carer Payment have received some form of income support for more than 10 years, with many relying on income support for long periods before receiving Carer Payment.<sup>5</sup>

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<sup>1</sup> Australian Bureau of Statistics, 2012 Survey of Disability, Ageing and Carers

<sup>2</sup> As at March 2015, [www.data.gov.au](http://www.data.gov.au)

<sup>3</sup> Australian Bureau of Statistics 2012 Survey of Disability, Ageing and Carers

<sup>4</sup> Australian Human Rights Commission 2009, p.14

<sup>5</sup> Commonwealth of Australia 2014 (a), p.36

- Only 19.5 per cent of primary carers who aren't in the workforce (or who are unemployed) worked just prior to commencing the caring role.

This illustrates that those who are already out of work are more likely to take on the caring role which further compounds their long-term economic disadvantage into retirement.

### **Caring can be intense and protracted**

Those who provide a significant level of care are often in the caring role for extended periods of time.

#### **What we know:**

- Over a third (34.1 per cent) of primary carers have been caring for 10 years or more.
- Some 38.9 per cent of primary carers care for 40 or more hours per week, and a further 19.5 per cent care for 20-39 hours per week.
- Of the 299,300 primary carers who provided care for more than 40 hours on average per week, 28,400 primary carers (9.5%) had been providing care to their recipient for more than 25 years.<sup>6</sup>

## **Caring and employment**

### **Caring affects workforce participation**

Current workplace structures often evolve around ideas of the 'ideal worker' who is a male breadwinner supported by a wife who cares full time for their children.<sup>7</sup> This has led to a scarcity of adequate flexible working arrangements for employees which will allow them to combine paid work with an unpaid caring role. The result is a high proportion of carers who drop out of the workforce to care.

#### **What we know:**

- The workforce participation rate of primary carers aged 15-64 years is 52.6 per cent compared to 79.7 per cent of non-carers of the same age.
- 8.4 per cent of all carers aged 15-64 years are under-employed, compared to 6.4 per cent of non-carers of the same age.<sup>8</sup>

### **Many carers trade salary for flexibility**

While many primary carers drop out of the workforce to take on caring responsibilities, there are others for whom caring full-time is not financially viable. However finding an employer who is understanding about the caring role and who provides adequate flexible work and leave arrangements can be hard. For working carers, finding a balance between paid work and unpaid caring responsibilities often comes at a price. This can mean taking on roles which don't fully match their skills and experience<sup>9</sup>, and accepting lower-paid jobs in order to secure adequate flexibility that will allow them to combine work and care.

### **Carers can find it difficult to re-enter the workforce**

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<sup>6</sup> Australian Bureau of Statistics 2012 Survey of Disability, Ageing and Carers

<sup>7</sup> Australian Human Rights Commission 2009, p.15

<sup>8</sup> Australian Bureau of Statistics 2012 Survey of Disability, Ageing and Carers

<sup>9</sup> Australian Human Rights Commission 2009, p.16

Those who are unpaid carers for a substantial period of time are often left with little relevant employment experience or education and training to allow them to transition into the workforce when their caring role ceases or is reduced. Many carers are therefore on income support for long periods even after leaving Carer Payment or Carer Allowance.

#### What we know:

- The average duration on Carer Payment is 5.9 years, for Carer Allowance it is 4.8 years (this compares to Newstart Allowance at 2.2 years<sup>10</sup>).
- Just under a quarter (23.8 per cent) of Carer Payment recipients have been on the payment for 5-10 years, a further 11.8 per cent have been on the payment for more than 10 years.<sup>11</sup>
- Around 42 per cent of those who stopped receiving Carer Payment in 2012-13 went on to another working age income support payment. The most common working age payment was Newstart Allowance (61 per cent), followed by the Disability Support Pension (13 per cent).<sup>12</sup>

## Impact of caring on retirement

### Caring across the lifecycle

For those who care for someone with a disability, mental illness, chronic condition, or someone who is frail aged, the caring role generally doesn't have a discrete beginning and end around which financial and work commitments can be planned. Unlike parents of children who can plan ahead to some degree, the onset of caring is often sudden and unexpected and the end is unknown. The nature and intensity of the role can also fluctuate over time as the health and caring needs of the family member or friend change. This can make future planning about financial savings and retirement extremely difficult, if not impossible. Indeed for many carers the notion of 'retirement' simply doesn't exist. Caring can be a lifelong role at the end of which is significant financial uncertainty and often poverty.

### Carers are more likely to retire involuntarily

The degree of involuntary retirement in Australia is substantial. In its recent report '*Superannuation Policy for Post-Retirement*', the Productivity Commission estimated that just under one half of all Australians that retired between the ages of 45 and 70 did so involuntarily.<sup>13</sup> The Productivity Commission found that ill health was a dominant factor for individuals who retire involuntarily, either their own ill health or that of a spouse or family member. The data showed that around 28 per cent of men and 25 per cent of women aged 60-64 who retired did so because of caring responsibilities or poor health,<sup>14</sup> as is illustrated in the **Figure** below. Importantly, the data also showed that the involuntarily retired also have lower levels of accumulated assets than voluntary retirees.<sup>15</sup>

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<sup>10</sup> As at March 2015 [www.data.gov.au](http://www.data.gov.au)

<sup>11</sup> Ibid.

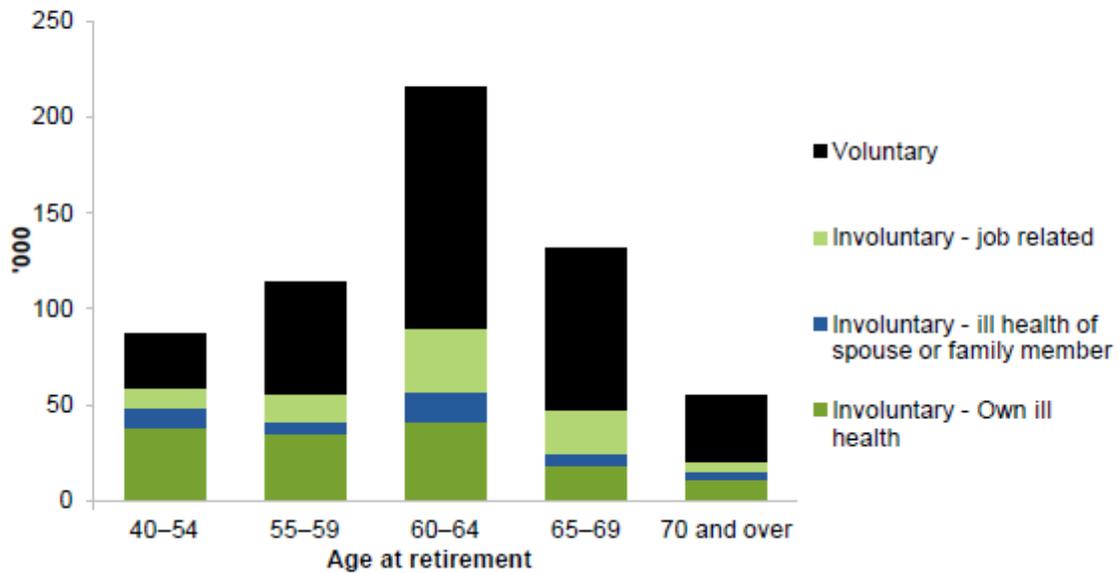
<sup>12</sup> Commonwealth of Australia 2014 (a), p.36

<sup>13</sup> Using the 2011 wave of the HILDA survey, Productivity Commission 2015, p.211 (Vol 2)

<sup>14</sup> Productivity Commission 2015, p.9

<sup>15</sup> Productivity Commission 2015,p.36

Figure 5 Number of people retiring, by age group and reason for retirement, 2011



Source: Productivity Commission 2015, 'Superannuation Policy for Post-Retirement', p.10

### Carers have less savings to fall back on in retirement

The financial impact of caring can be substantial, and not only for those who drop out of the workforce to care. Unpaid carers also face a range of additional costs including out-of-pocket healthcare costs such as for specialists, medications and therapies; home and vehicle modifications; aids and equipment; increased utilities bills; special dietary requirements and respite support.

#### What we know:

- 54.9 per cent of all primary carers have a government pension or allowance as their main source of personal income, compared to 20.4 per cent of non-carers.
- 29.4 per cent of all primary carers aged 35-54 years have had their income decrease as a result of caring.<sup>16</sup>
- 17.5 per cent of primary carers report having extra expenses and difficulty meeting everyday living costs.<sup>17</sup>

### Carers are generally reliant on government support in retirement

Unsurprisingly, after protracted periods out of the workforce during which carers are unable to save, primary carers are generally reliant on government support during retirement.

#### What we know:

- The main source of personal income for 76 per cent of primary carers aged 60-69 years is a government pension or allowance, compared to 45 per cent of non-carers of the same age.

<sup>16</sup> Australian Bureau of Statistics 2012 Survey of Disability, Ageing and Carers

<sup>17</sup> Australian Bureau of Statistics 2012 'Caring in the Community'

- Only 22 per cent of primary carers aged 70-79 receive their main source of income from superannuation compared to 30 per cent of non-carers of the same age.<sup>18</sup>

### **Many carers don't have income or savings of a partner to fall back on in retirement**

For those who have had broken careers due to unpaid caring responsibilities and who have had less capacity to save for retirement, having a partner (with an unbroken career) can make all the difference in achieving financial security in retirement.

However, the physical, emotional, social and financial effects of the caring role often take a toll on relationships and primary carers have a higher separation rate than non-carers.

#### **What we know:**

- 13.6 per cent of primary carers are either separated or divorced compared to 9.7 per cent of non-carers. There is also a gendered dimension to this with 17.8 per cent of female primary carers either separated, divorced or widowed compared to 11.9 per cent of male primary carers.<sup>19</sup>
- 42 per cent of Carer Payment recipients aren't partnered.<sup>20</sup>

## **Why change is necessary- a comprehensive and holistic review of retirement incomes**

As highlighted by the Productivity Commission, the three pillars which make up the retirement system (the Age Pension, Superannuation Guarantee and voluntary savings) are “inextricably linked [and] changes in each can, and often do, affect the others”.<sup>21</sup> Carers Australia shares the view of COTA that the review must look “in an integrated way at taxation, transfer payments, superannuation, mature employment, later life housing and financing aged care”.<sup>22</sup>

### **Demographic changes mean retirement incomes are increasingly important**

Australia's population is projected to change and grow over the next 40 years, with the proportion of the population aged 65 and over expected to increase while there will be fewer people of traditional working age compared to the very young and the elderly.<sup>23</sup>

These demographic changes will increase demands on the retirement system<sup>24</sup>. As the Re:think Tax Discussion Paper points out, more individuals will enter the retirement phase where no tax is paid on earnings in superannuation funds, which puts pressure on the long-term sustainability of the superannuation tax arrangements.<sup>25</sup>

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<sup>18</sup> Australian Bureau of Statistics 2012 Survey of Disability, Ageing and Carers, using ABS TableBuilder

<sup>19</sup> Ibid.

<sup>20</sup> As at March 2015, [www.data.gov.au](http://www.data.gov.au)

<sup>21</sup> Productivity Commission 2015, p.22

<sup>22</sup> COTA Australia 2015, p.3

<sup>23</sup> Commonwealth of Australia 2015, pp. vii-viii

<sup>24</sup> Productivity Commission 2015, p.3

<sup>25</sup> Australian Government 2015, p.69

## **The current system is inefficient**

While at least two thirds of Australia's budget deterioration is on the revenue side,<sup>26</sup> only 20 per cent of retirees over 65 pay income tax<sup>27</sup>, despite steady growth in superannuation fund earnings and benefits, and increasing participation in paid employment.<sup>28</sup>

According to The Australia Institute;

"The age pension currently costs \$39 billion and superannuation tax concessions will cost the budget around \$35 billion in 2013-14. These concessions are projected to rise to \$50.7 billion in 2016-17, an increase of around 12 per cent per annum. By this time superannuation tax concessions will be the single largest area of government expenditure."<sup>29</sup>

The government's own projections are that the cost of super tax concessions as a share of GDP will exceed that of the age pension by 2016-17<sup>30</sup>.

## **The current system is inequitable**

The current retirement system provides the most benefits to those with the greatest capacity to save, and disadvantages those who have had broken careers and/or lower paid jobs.

The *Re:think Tax discussion paper* acknowledges the inherent inequities in the current system, highlighting that mechanisms to reduce assessable income (such as through superannuation contributions and maximising deductions by applying losses from other activities) are more commonly used by people on high assessable incomes.<sup>31</sup> The discussion paper also points out that the way the concessions are applied means that those with high incomes receive the greatest tax discount relative to their marginal rates, and generally save a higher proportion of their income.<sup>32</sup>

There are many who argue that the current system of superannuation taxes is regressive. The 15 per cent tax on all contributions and investment income (with investment income in the drawdown phase being tax free) benefits high income earners who would otherwise pay marginal rates up to 47 per cent tax on their income. Conversely, it disadvantages low income earners who would normally be free of tax up to approximately \$18,000.<sup>33</sup>

Indeed the overwhelming majority of assistance provided through superannuation concessions flows to high income earners. Low income earners receive virtually no benefit.<sup>34</sup>

The recent Financial System Inquiry found that tax concessions in the superannuation system "are not well targeted at improving retirement incomes, which has a number of consequences. It increases the cost of the superannuation system to taxpayers; it increases distortions due to higher levels of taxation elsewhere in the economy and due to the differences in the way other savings vehicles are taxed; and it contributes to the broader problem of policy instability, which imposes

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<sup>26</sup> Australian Council of Social Services 2015 (b), p.3

<sup>27</sup> National Welfare Rights Network 2015, p.5

<sup>28</sup> Australian Council of Social Services 2015 (a), p.27

<sup>29</sup> The Australia Institute 2014, p.1

<sup>30</sup> Ibid.

<sup>31</sup> Australian Government 2015, p.49

<sup>32</sup> Australian Government 2015, p.67

<sup>33</sup> The Australia Institute 2014, p.5

<sup>34</sup> The Australia Institute 2014, p.1

unnecessary costs on superannuation funds and their members and undermines long-term confidence in the system”.<sup>35</sup>

#### What we know:

- The bottom 60 per cent of income earners receive 27.2 per cent of superannuation tax concessions.<sup>36</sup>
- The top 10 per cent of income earners receive 31.8 per cent.<sup>37</sup>
- On the latest Treasury figures the jump in assistance at the top income decile is quite marked. While total average assistance for all other income groups is around \$265,000, at the 90<sup>th</sup> percentile of male earners it jumps to \$350,000; for the 95<sup>th</sup> percentile to \$425,000 and for the 99<sup>th</sup> percentile to \$515,000<sup>38</sup>
- Analysis by the Association of Superannuation Funds of Australia found that 24,000 people with self-managed funds with balances of \$2 million received around \$5.2 billion in tax-free income- which equates to an average of around \$216,000 each.<sup>39</sup>

### The current system lacks clear policy direction

The Financial System Inquiry conducted in 2014 reported that “The absence of agreed objectives [within the superannuation system] contributes to the short-term ad hoc policy making. It adds complexity, imposes unnecessary costs on superannuation funds and their members, and undermines long-term confidence in the system”.<sup>40</sup>

In their 2015 report *Superannuation Policy for Post-Retirement*, the Productivity Commission argued “It is unclear whether the current concessional tax rates applied to superannuation are designed and targeted as effectively as they could be, and whether they provide an incentive to make additional savings for retirement, or merely distort the way that people store their wealth”.<sup>41</sup>

## The current retirement system disadvantages carers

### There is an imbalance in superannuation savings

Current variations in superannuation balances are due to several factors; linking compulsory contributions to an individual’s earnings; absences from the workforce; and disparities in voluntary superannuation contributions’.<sup>42</sup> Each of these factors disadvantages carers.

As discussed earlier, the need to undertake unpaid caring responsibilities can have a considerable effect on workforce attachment. Many carers are forced to leave the workforce for extended periods of time while others who are able to combine work and care often take on lower paid positions in order to secure adequate flexibility. The result is an imbalance in superannuation savings, particularly for women, who are more likely to take on caring responsibilities.

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<sup>35</sup> Commonwealth of Australia 2014 (b), p.90

<sup>36</sup> The Australia Institute 2014, p.5

<sup>37</sup> Ibid.

<sup>38</sup> The Australia Institute 2014, p.6

<sup>39</sup> National Welfare Rights Network 2015, p.5

<sup>40</sup> Commonwealth of Australia (b),pp.96-97

<sup>41</sup> Productivity Commission 2015, p.20

<sup>42</sup> Productivity Commission 2015, p.7

### What we know:

- Of all retired households, single women are most likely to be reliant on the full Age Pension as their main source of retirement income<sup>43</sup>.
- Between 2000-2005, single elderly female households had not only experienced the highest incidence of poverty compared to other household types, but also have been at the greatest risk of persistent poverty<sup>44</sup>.
- In 2006, the average superannuation account balance for women was \$35,520 compared to \$69,050 for men<sup>45</sup> and the average retirement payout for women 60-64 years was \$63,000 compared to \$136,000 for men of the same age.<sup>46</sup>
- In 2012, the average household net worth for single retired women over 65 was \$160,000, compared to \$238,000 for single retired men.<sup>47</sup>

### **Carers generally don't benefit from the current transition to retirement arrangements**

The current transition to retirement arrangements which allow salary sacrificing into superannuation accounts are used by many to reduce tax paid on income<sup>48</sup>.

As previously discussed, the benefits of these arrangements flow mainly to those with higher incomes, while those with lower incomes are not able to take advantage of the same concessions.

Indeed the Productivity Commission argues that “the tax concessions embodied in transition to retirement pensions – designed to ease workers to part-time work prior to retirement- appear to be used almost exclusively by people working full-time and as a means to reduce tax liabilities among wealthier Australians.”<sup>49</sup>

The abolition of the Low Income Superannuation Contribution (LISC)<sup>50</sup> is a further blow to already disadvantaged carers. The removal of LISC “means that low-income earners will pay more tax on their compulsory super contributions than they do on their ordinary wages”<sup>51</sup>.

There are also inconsistencies in the taxation on investment which favour those with the financial capacity to save through vehicles which have lower associated tax (e.g. capital gains), compared to those mainly used by low and middle income earners (e.g. bank interest).<sup>52</sup>

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<sup>43</sup> Australian Human Rights Commission 2009, p.3

<sup>44</sup> Ibid.

<sup>45</sup> Australian Human Rights Commission 2009, p.5

<sup>46</sup> Australian Human Rights Commission 2009, p.6

<sup>47</sup> Australian Human Rights Commission 2009, p.7

<sup>48</sup> Productivity Commission 2015, p.39

<sup>49</sup> Productivity Commission 2015, p.20

<sup>50</sup> Australian Taxation Office <https://www.ato.gov.au/general/new-legislation/in-detail/other-topics/repeal-of-mrrt-and-related-measures/low-income-super-contribution/>

<sup>51</sup> Denniss 2015

<sup>52</sup> Australian Council of Social Service 2015 (b), p.10

## Recommendation 1: A fairer retirement incomes system

Carers Australia shares the view of many in our sector that fairness and equity should be the main principles which underpin the tax system<sup>53</sup>, and that the objective of the retirement system should be “to alleviate poverty and facilitate people saving enough to enable them to have a decent standard of living in their post-working life”.<sup>54</sup>

### 1.1 Equity in superannuation concessions

- There should be equity in superannuation tax concessions to ensure the benefits are provided equitably between low, middle and high income earners.<sup>55</sup>

### 1.2 Consideration of broken careers due to caring responsibilities

- Consideration of caps on additional contributions for people with unbroken careers, should include a degree of flexibility to allow those with broken careers (such as carers) to ‘make up’ ground in superannuation savings.<sup>56</sup>
- The Government consider the previous recommendations of the Australian Human Rights Commission to specifically recognise and reward unpaid caring work in the retirement income system by providing superannuation payments for those on Carer Payments.<sup>57</sup> This should be considered in the context that Access Economics estimated the replacement cost of informal care was \$40.9 billion in 2010<sup>58</sup>, and is likely to be even higher today.

### 1.3 Consideration of those who face involuntary retirement

- Carers Australia supports the following recommendations by the Productivity Commission:
  - Involuntary retirement needs to be better understood and taken into consideration when contemplating changes to retirement income policy. Those who retire involuntarily have less scope to change their behaviour in response to policy changes such as increases in the preservation age or the Age Pension age.
  - The superannuation system needs to better account for diversity; the way people hold their savings; the amount of savings; expectations for retirement; and levels of financial literacy.<sup>59</sup>

## Recommendation 2: An adequate social security safety net

Carers who have previously received the Carer Payment will often transition onto Newstart Allowance when the person they care for dies or moves into residential care, or when the carer is no longer able to keep providing care due to the stress and physical effort involved. This transition can leave carers considerably worse off financially.

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<sup>53</sup> St Vincent de Paul Society 2015, Australian Council of Social Services 2015 (b)

<sup>54</sup> Australian Council of Social Services 2015 (a), p.8

<sup>55</sup> Australian Human Rights Commission 2009, p.11

<sup>56</sup> COTA Australia 2015, p.8

<sup>57</sup> Australian Human Rights Commission 2009, p.26

<sup>58</sup> Access Economics 2010

<sup>59</sup> Productivity Commission 2015, pp.20-26.

## 2.1 Address the gap between pensions and allowances

- Carers Australia supports the recommendations of ACOSS to:
  - Raise allowance payments by \$51 per week for single people.
  - Index pensions and allowances in a consistent way.
  - Keep the pension age at 67 years until allowance payments are raised to pension levels and reasonable employment opportunities and supports are available to older people.

## 2.2 Provide adequate housing support

- Carers Australia supports the recommendations of ACOSS and others in the sector to:
  - Increase maximum rates of Rent Assistance by 30 per cent.
  - Adopt a national affordable housing strategy which includes substantial new capital investment in social housing and the replacement of tax deductions relating to negatively-geared rental property investment with more efficient tax incentives for the construction of affordable new housing.

## Recommendation 3: Opportunities for mature-age employment

Long-term carers have particular difficulties entering or re-entering the workforce once their caring role ceases, as they are often left with little relevant employment experience or education and training to allow them to transition from income support to employment.

### 3.1 Allow for smooth transitions on and off income support

- Carers Australia supports the recommendations of Uniting Care Australia and Anglicare Australia to:
  - Identify how tax taper rates can better address issues of underemployment and participation of older people in the workforce<sup>60</sup>.
  - Address the interface between the tax and transfer systems so there is more encouragement (and fewer penalties) for people who find themselves moving on and off allowances and in and out of work<sup>61</sup>

### 3.2 Support carers in the post-caring period to re-train and find employment

- Long-term carers who are transitioning from Carer Payment to employment need comprehensive support and assistance to enter or re-enter the workforce. This support must include opportunities to re-train and update skills.
- The Government consider the previous recommendations of the Senate Education, Employment and Workplace References Committee to develop targeted and tailored programs to help former carers transition into employment.<sup>62</sup>

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<sup>60</sup> Uniting Care Australia 2015, p.4

<sup>61</sup> Anglicare Australia 2015, p.5

<sup>62</sup> Senate Education, Employment and Workplace Relations References Committee 2012

### **3.3 Strengthen the legal framework which supports working carers**

- Limitations to the 'right to request' flexible working conditions under the Fair Work Act should be addressed so that employees who have been working less than 12 months can also negotiate the flexible conditions they need to combine work and care.
- The description of caring situations which qualify an employee for paid carer's leave under the Fair Work Act should be expanded to include those who care for someone with a long-term or permanent disability or someone who is frail aged.

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