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Homeless young people are entirely dependent on Government income support. The Youth Allowance is designed to support full-time students and unemployed young people. The 'unreasonable to live at home' criteria provides additional support for homeless young people. The bureaucratic requirements of identification and evidence present barriers for homeless young people, demonstrated by the number of young people who enter SAAP services with no income support in place. For young people under the age of 15, the youth protocol sets down who is responsible for the younger homeless. But in practice many 12-15 year olds do not receive priority attention from their state or territory care and protection services and duly turn up in SAAP services. The level of income support available to homeless young people is insufficient for the costs of living independently: this needs review, as does inadequate rental assistance in a market where rents are rising steeply. The administration of benefits using 'breaching' causes many consequential problems. Compliance for homeless and at-risk young people should be approached differently.

Chapter 19 | Income support

Introduction

19.1 The Australian Government has the primary responsibility for providing income support to vulnerable Australians. This is achieved through the provision of pensions and benefits to unemployed people, students, the elderly, sole parents, people with disabilities and other vulnerable groups.

19.2 Payments from the Australian Government, through Centrelink, are a major source of income for homeless young people. Mission Australia, which undertakes an annual survey of young Australians and has included information about homeless young people, found that 27.8 per cent of homeless respondents identified a government allowance as their main source of support:

This is in contrast with respondents living in stable housing, with only 5.2 per cent of this group identifying government allowances as their major source of income, highlighting the importance of adequate income support for homeless young people.¹

19.3 The chapter discusses the main types of income support for homeless young people, and their adequacy and highlights the difficulties homeless young people face in gaining and maintaining income support. A stable, adequate income is a critical element in regaining and maintaining stability in accommodation. Some recommendations have been included for the Australian Government to improve the income support system for homeless young people.

Types of income support payments for homeless young people

Youth Allowance

19.4 Youth Allowance is the main Centrelink payment for young people. It is for full-time students and unemployed young people. To receive Youth Allowance, unemployed young people must be undertaking 'approved activities'. These can be looking for work, voluntary work, or a combination of activities such as part-time study and on-the-job training while working.

19.5 Different rates of Youth Allowance are available depending on whether the young person is living at home or unable to live at home for various reasons. Homeless young people may be able to receive the 'independent' rate of Youth Allowance if they are able to show Centrelink they are unable to live at home with their parents or guardians because of:

- "extreme family breakdown" or other exceptional circumstances; or
- it would be unreasonable to expect them to stay at home because there would be a serious risk to their physical or mental health due to violence, sexual abuse or other unreasonable circumstances; or
- their parents cannot provide a suitable home because they lack stable accommodation.²

19.6 If a young person cannot prove 'independence' then a parental income test applies to their Youth Allowance.

Newstart Allowance

19.7 Newstart Allowance is available to unemployed people from the age of 21 years. To receive Newstart an unemployed person must satisfy an activity test (i.e. be actively seeking work), be prepared to enter into an Activity Agreement, and meet certain residency requirements.

Disability Support Pension

19.8 The Disability Support Pension (DSP) is available to people who are 16 years of age or over and:

- are permanently blind; or
- have a significant physical, intellectual or psychiatric 'impairment' which prevents them from working.

Parenting Payment

19.9 A parenting payment is available for people who have a child or children in their care. For single people, payment can be made until the youngest child is eight years of age, and, for partnered people, payment can be made until the youngest child turns six. People may be eligible for alternative income support payment types once their children are above the maximum ages for the Parenting Payment to be paid.³

Special Benefit

19.10 A homeless young person under 15 years may be paid Special Benefit, although the requirements of the relevant Commonwealth and State and territory Youth Protocol will need to be satisfied.⁴

Rent Assistance

19.11 Commonwealth rent assistance is a non-taxable income supplement payable to eligible recipients of Centrelink benefits and/or support through the Family Assistance Office, who rent accommodation in the private rental market and pay rents above a set threshold based on their circumstances.⁵

Access to income support

19.12 Accessing Centrelink benefits requires negotiating a bureaucratic maze. Shopfront Youth Legal Centre argued to the Inquiry that homeless young people commonly encounter difficulties with the income support system, owing to its immense complexity, and to the cracks that exist in the system.⁶

19.13 A young person applying for a Centrelink benefit needs to be able to provide identification, bank account details and a tax file number. An unemployed young person will have to make an appointment with Centrelink, agree to undertake 'approved activities', and register with a Job Network provider.

19.14 To gain the independent rate of Youth Allowance, Centrelink requires a homeless young person, their parents and a third person, in most cases, to complete statements explaining the circumstances at home. The young person will also need to meet with a Centrelink social worker to talk about their circumstances.⁷

19.15 The fact that many homeless young people present to services with no income support shows that negotiating the bureaucratic maze is difficult for them. For example, one service in north-eastern Victoria found that:

... 33 per cent of all our young people presenting as being homeless were not receiving any form of social security or allowance.⁸

19.16 The main difficulty appears to be that young people who have recently left home cannot prove they are homeless or independent for the purpose of receiving benefits.⁹

Income support for under 15s

19.17 The only income support from Centrelink for young people aged under 15 years of age is Special Benefit, which is even more difficult to obtain than Youth Allowance or Newstart. To be paid the Special Benefit, the requirements of the relevant Youth Protocol must be satisfied.

19.18 The Youth Protocols are agreements made between the Australian Government and each state and territory Government. The current protocols assume that state and territory Governments have responsibility for young people under 15 years. An assessment by the relevant state or territory department regarding a source of support for a young homeless person should be made.

19.19 The Youth Protocol approach appears to be a sensible response to ensuring that a young person under 15 years who becomes homeless comes to the attention of the relevant state and territory authority. However, as discussed in Chapter 9 State Care and Protection, many young people who first come to the attention of the Care and Protection systems when aged between 12 and 15 years are not adequately supported by that system.

19.20 The Inquiry understands there are significant problems with the Youth Protocols. The relevant state or territory government department has a specific number of days to respond to a request for assistance; however, Centrelink payments are not made until this time has lapsed and will then only be paid where the young person can meet the requirements for payment, such as proof of identity and proof that they are unable to live at home¹⁰, which is likely to cause further delays.

19.21 The Inquiry was told of instances where the Youth Protocol did not work. In one case the relevant state authority and Centrelink both:

... felt it was the responsibility of the other department, and it was only by protracted negotiations and by instituting an appeal provision within the legal system that we in fact got some sort of resolution of the matter and an agreed outcome for that young person.¹¹

Advocacy from youth workers

19.22 Good advocacy from youth workers can help smooth the way for young people to gain benefits, but this does not always happen quickly and in the meantime a young person is often left with no income. Youth services, such as SAAP, JPET and youth legal centres prioritise and divert resources (e.g. staff time) to assist young people to gain access to Centrelink benefits. Mission Australia told the Inquiry:

We would certainly have young people coming to our services who currently do not access Centrelink, and so one of the first things we would aim to do is connect them to that.¹²

19.23 The Inquiry was told that at times Centrelink could be very helpful in assisting with some of these issues, particularly with the issue of identification. Good working relationships between youth workers and the Centrelink Social Worker can greatly assist the young person negotiate the maze¹³ and shorten the time waiting for benefits to be paid.

19.24 While these youth services usually do their best to assist young people with Centrelink they are not always successful. This could be due to the young person's lack of eligibility or inability to prove homelessness.

19.25 The degree to which young people have no income and little support is of great concern. The extent of this is unknown, but various estimates indicate that it is a significant problem. For example, the Executive Officer of Australian Federation of Homelessness Organisations told the Inquiry that:

*One-third of young people who leave SAAP have no source of income.*¹⁴

19.26 This does not, of course, include those young people who have had no contact with SAAP agencies.

Adequacy of income support

19.27 The maximum level of Youth Allowance payable is \$348.10 per fortnight for single young people under 21 years living away from home with no children. For unemployed single young people aged over 21 with no children, the maximum rate of Newstart is \$424.30 per fortnight. In addition, for those living in private rental accommodation an additional amount of up to \$104.00 per fortnight is available in rent assistance if rent is over \$92.60 per fortnight. The maximum rate of rent assistance is payable if rent is more than \$231.27 per fortnight. Rent Assistance is only up to \$69.33 per fortnight for young people in share rental accommodation.¹⁵

19.28 Therefore, the maximum amount that a young person aged less than 21 years is expected to live on is \$452.10 per fortnight, including rent assistance. For those over 21 years the maximum amount is \$528.30 per fortnight. These both are significantly lower than the Henderson Poverty Line level for a single person with no dependents, which was \$571.10 per fortnight in March 2007.¹⁶

Income support is insufficient to cover living costs

19.29 The level of income support from Youth Allowance was criticised by most service providers and young people in their verbal and written evidence to the Inquiry as being insufficient to cover basic living costs. The Youth Accommodation Association (NSW), told the Inquiry:

*... the basic youth allowance, including rent assistance, is \$208 a week, while the average two bedroom unit in Sydney is \$300 a week even in share accommodation, so if that young person was paying \$150, it would leave \$60 to cover other expenses such as food, clothing, utilities, transport, school or university expenses, any entertainment, all of those basic needs.*¹⁷

19.30 A homeless young person in Brisbane told the Inquiry about her experience of Youth Allowance and renting:

*Being on the independent youth allowance is not a lot. It's exceedingly tough to do. I have had to do it before and I got rent assistance, which worked it up to \$400 a fortnight. When you are paying \$250 rent a fortnight, you don't have a lot left over for food at all.*¹⁸

19.31 The Youth Affairs Council of South Australia told the Inquiry that the low levels of income support payments mean that:

*... when young people are unemployed for a sustained period, they are most likely to be suffering significant material and personal hardship. Income support for young people is well below independent living costs, meaning that those who do not have families on which they can rely economically, are forced into poverty.*¹⁹

19.32 The Inquiry was told that some young people become so desperate that they turn to criminal activity to obtain food and other necessities. UnitingCare Burnside informed the Inquiry of some the impacts of low levels of income support as told to them by their clients:

*Some young people spoke about the desperation and helplessness that results from inadequate income. Unable to find their next meal, some young people resort to shop lifting food on occasion in order to survive.*²⁰

19.33 It is not uncommon for young people to avoid public transport fares and risk fines because they have no income to spare for such necessities. They risk the imposition of significant fines for fare evasion (see Chapter 18 Crime and Legal Issues for details).

19.34 The general consensus among young people, youth workers et al is that income support, Youth Allowance and Newstart in particular, is insufficient to pay for the necessities of life, even without the additional costs associated with job search, or attendance at school, university or TAFE.

Rent Assistance

19.35 Rent Assistance has not been keeping pace with the large increases in rent that have been experienced throughout Australia. In its written submission to the Inquiry, the Western Australian Government's Department of Housing and Works drew the Inquiry's attention to the erosion of the effectiveness of the Rent Assistance. The Department advised that currently the program only delivers affordability to about a third of recipients and pointed out that any increase in the rate had been overtaken by rental costs in Perth:

*The median private rental for Perth houses increased by 67 per cent between the June quarter 2001 and the December quarter 2006, which far outpaced the 18 per cent growth in Commonwealth Rent Assistance. From representing 32 per cent of the median rent in 2001, the value of rent assistance declined to 23 per cent of the median rent by December 2006.*²¹

19.36 In a combined submission the Council of Homeless Persons (Vic) with the Youth Affairs Council of Victoria and Project i questioned the benefits of the Australian Government's \$2.13 billion per annum expenditure on the Rent Assistance program:

Whilst those young people on Youth Allowance or Newstart Allowance qualify for Rent Assistance, 35 per cent of all Rent Assistance recipients across Australia still spend 30 per cent or more of their household income on rent. The National Centre for Social and

*Economic Modelling upholds this portion as a generally accepted indicator of 'housing stress.'*²²

19.37 The combined submission also expressed concern about the lack of support for young people on low wages who do not receive any assistance with rents because:
*... eligibility for Rent Assistance is linked to receipt of other government benefits, which means that young people who are employed at the minimum wage or part-time, do not qualify.*²³

Payments inadequate for educational purposes

19.38 Although, a lack of income was not the primary reason for homeless young people to leave school, the Inquiry was often told that a lack of income inhibits homeless young people from returning to mainstream education and training. For example, UnitingCare Burnside told the Inquiry that:

*Poor income also restricts a young person's options to pursue further education.*²⁴

19.39 The North East Support and Action for Youth was one of a number of organisations which suggested that:

*Greater income support for young people, who live independently for various reasons, to enable young people to continue their education ... is really important.*²⁵

Age Differences

19.40 The level of payment varies due to differences in the age of the recipient despite similar living costs. For young people who are under 21 years old with no dependants, the Youth Allowance is \$76.20 per fortnight less than the amount paid to Newstart Allowance recipients aged 21 years with no dependants. The Council for Homeless Persons combined submission argued that:

*... this disparity is groundless and unjust given that housing and other necessary living costs do not vary with age.*²⁶

Maintaining benefits

Activity Tests

19.41 Students on Youth Allowance must remain in full-time study or face the removal of their Youth Allowance. For those under the school leaving age in their state or territory, participation in education is usually an activity requirement for Youth Allowance. The school leaving age is 16 years in most jurisdictions in Australia.²⁷

19.42 Some states are raising the school leaving age to 17 years unless the young person is attending TAFE or another registered training provider, or is in appropriate employment. For example, in Western Australia from 1 January 2008 the school leaving age will be 17 years, unless permission is granted to attend a TAFE college, undertake an apprenticeship or traineeship, or work in a job that will improve employment

prospects.²⁸ The impact of these changes on eligibility for Youth Allowance is unclear at this stage, but will most likely require young people to remain in education or training to maintain their benefits unless they can find full-time work.

19.43 For unemployed young people, to maintain their Newstart Allowance or Youth Allowance, recipients must be actively seeking and willing to undertake paid employment. In addition, a young person may be required to satisfy an activity test in one or more of the following ways:

- undertake specific job search requirements;
- enter into an Activity Agreement;
- undertake “mutual obligation” activities or other activities such as community or voluntary work, “Work for the Dole”, JPET, or part-time study (see Chapter 20).

Breaching

19.44 Youth Allowance (unemployed), Newstart Allowance, and some Special Benefit recipients are required to enter into an Activity Agreement. For most young people passing this activity test may not appear to be too onerous.

19.45 Homeless young people can be granted an exemption from the activity test because of their homelessness but this exemption lasts only for the time it takes to address the immediate crisis or 13 weeks, whichever is the shorter period. An extension may be granted at the end of the period but an application needs to be made.

19.46 In practice it appears that many homeless young people or young people at risk of homelessness are required to satisfy the activity test. For homeless young people, however, fulfilling these requirements may be a difficult task. Homelessness itself is an impediment to fulfilling the test. Not having a fixed address means that correspondence from Centrelink is often missed or received too late. The Queensland Public Interest Law Clearing House in a combined submission with a number of key Queensland services, commented that:

The system is not overtly discriminatory towards homeless young people, but rather there are systemic problems preventing homeless young people from accessing entitlements under the scheme. A requirement for the receipt of benefits is that people respond to letters promptly, regularly apply for jobs and attend interviews. Because of their homelessness, many young people simply do not have the capacity to undertake the activities required to ensure they receive regular benefits.²⁹

19.47 If a young person does not apply for the required number of jobs, misses a job interview, does not comply with the Work for the Dole program, does not undertake a required labour market program, and/or misses a Centrelink appointment without an acceptable excuse, they will fail the activity test. If a young person does not meet the requirements of the activity test without a reasonable excuse, often referred to as ‘breaching’, they may incur a penalty. Penalties for ‘breaching’ can be severe, and include the suspension of payments for the number of days it takes for a person to comply with

a rescheduled participation requirement or for a repeated or more serious breach the penalty will be an eight week no payment period.³⁰

19.48 The Welfare Rights Network reported a dramatic increase in the incidence of social security penalties imposed on unemployed young people receiving benefits between 1998 and 2001.³¹ This same report highlighted that young homeless people on Youth Allowance or Newstart are disproportionately affected by indiscriminately applied penalties. This is shown by the fact that 35 per cent of penalties applied by Centrelink in that period were subsequently revoked.

19.49 The suspension of benefits payment for up to eight weeks is generally regarded as extremely harsh by most youth workers and results in young people facing "... extreme hardship and poverty".³²

Debts with Centrelink

19.50 Many homeless young people end up owing Centrelink for 'over payments'. When a young person's circumstances change and Centrelink is not informed immediately, overpayments can occur that need to be repaid. For example, homeless young people often have difficulty in staying in education or training full-time, a requirement of Youth Allowance for students. As a result, if they drop out of education and fail to inform Centrelink immediately their payment continues as though they had remained in education. This results in a debt to Centrelink that needs to be repaid out of future payments. The Youth Allowance, created through the merging of Austudy and unemployment benefits for young people, was meant to overcome problems encountered by young people moving in and out of education:

*However, young people switching between education and job-seeking continue to experience problems with Centrelink overpayments and debts.*³³

Pregnant young women

19.51 Unemployed pregnant young women on Youth Allowance or Newstart must meet the activity test until six weeks before the expected date of birth of their child. Several services pointed out the unreasonableness of expecting pregnant homeless young women to look for work:

*Centrelink [parenting payment] support does not start until after the birth, and the young women are expected to still be job hunting whilst pregnant.*³⁴

19.52 Job hunting, Work for the Dole or other required activity for Youth Allowance or Newstart would seem to be a highly inappropriate priority for these young women at a time when a focus on stable housing, antenatal care, parenting education and re-connection to community is urgently needed.

Income needed to stabilise accommodation

19.53 Having no income because Centrelink benefits are refused or withdrawn can lead to continued homelessness. The Salvation Army (Tasmania) told the Inquiry that:

*The lack of income forces some young people to sleep on the streets and increases the chances of offending behaviour to obtain food and clothing.*³⁵

19.54 Having income support payments cut, even if temporarily, means that young people trying to stabilise their accommodation end up back in the homelessness system. Southern Youth and Family Services (NSW) told the Inquiry:

*... how can a young homeless person maintain their accommodation when they are taken off their benefits? There is a serious cost to this, not just to the young person, but for instance, if they're evicted, then there is a cost to the system in re-locating the young person or the young person entering emergency accommodation. The punishment regime is huge and we remain unconvinced it assists young people at all.*³⁶

19.55 This is a common view held by most organisations represented at the Inquiry's hearings and in numerous submissions from services working with young people. For example, the combined submission from the Homeless Persons' Legal Clinic, Queensland Public Interest Law Clearing House (QPILCH) and a number of other key Queensland services stated that having income support paid intermittently is a:

*... major impediment to young people moving out of homelessness... Without access to the regular income from this agency [Centrelink], they are much more likely to remain in a situation of homelessness as they are not able to afford rent payments for adequate housing.*³⁷

19.56 QPILCH quoted a recent survey by the Salvation Army, which found that '... if young people are 'breached' by Centrelink and have their payments suspended, up to 16.5 per cent may end up in a situation of homelessness'.³⁸ This is a vicious circle because:

*The exigencies of their circumstances then prevent them from meeting their Centrelink requirements as they have to apply themselves to more pressing matters such as seeking alternative funds and securing temporary accommodation.*³⁹

Financial penalty in returning home

19.57 One parent suggested that a young person on the independent rate of Youth Allowance or special benefits is financially penalised if they return to the family home. She wrote that Centrelink:

*... by providing 'special benefits' which is the equivalent to the youth allowance - approximately \$348.00 per fortnight plus rent assistance ... if that young person does decide to return to the family home, they have to return to the parents' pensions as beneficiaries and forgo up to \$200.00 per fortnight in payments from Centrelink, making the transition back to family a 'non-viable' option for young people based on financial decisions alone.*⁴⁰

She considered that:

*This was like driving a wedge between that parent and the young person.*⁴¹

However, this was not a widely held view.

Findings and Recommendations

19.58 The maximum level of Youth Allowance should be raised to, at least, the level of Newstart. Independent young people aged 17 years face the same costs in renting properties etc as young people aged over 21 years.

Recommendation 19.1

The NYC Inquiry recommends that the total benefit for a young person who is homeless be equivalent to the adult Newstart allowance.

19.59 It is too difficult for some young people to 'prove' to Centrelink they are homeless. New systems should be considered and the views of service providers from SAAP, Reconnect and other services need to be taken into account by Centrelink when making a determination on eligibility.

Recommendation 19.2

The NYC Inquiry recommends that more weight be accorded to the professional assessment of service providers as to whether a young person is eligible for the 'unable to live at home' level of benefit.

19.60 Income support for young people under the age of 15 years needs to be clarified. The delays the Inquiry heard about are not helpful and actually hinder the ability of young people to stay in education and accommodation. Consideration should be given to paying a young person special benefit until the relevant child protection authority can make an assessment.

Recommendation 19.3

The NYC Inquiry recommends that the emergency special benefit be payable to young people under the age of 15 years and their carers until a determination of child protection issues and placement can be made and as well as decisions about the most appropriate place for that young person.

19.61 The 'breaching' of young people, leaving them without an income is a punitive and unjust way of applying consequences for young people on benefits who fail to keep appointments or do not respond to letters from Centrelink. The change in terminology from 'breach' to 'failure' under the Compliance Framework from 1 July 2006 is one indication of the sensitivity of this area of Centrelink practices. Homeless young people, in particular, need to be given support and encouragement to find employment and maintain themselves in education or training. Punishing them for missing an interview or Centrelink appointment is unlikely to engender a positive attitude to Centrelink and its staff, let alone encourage job-seeking or study. Indigenous young people who move around frequently often do not receive letters sent to certain addresses. One measure might be to withhold payments but restore them once a response has been received. This might achieve the same result but carry an incentive to comply rather than an applied punishment. Another measure might be to quarantine rental payments, or another might be to not withhold but transfer the receiving of the income support from the young person to an agency or an adult carer. Allowing more professional discretion

and flexible decision-making options for Centrelink staff would also help to reduce the number of disrupted payments to needy young people. The Department of Education, Employment and Workplace Relations (DEEWR) is the policy contractor of what is now called 'participation compliance'. A more compassionate and relevant approach to policy development by DEEWR would considerably improve the income support situation for homeless young people.

Recommendation 19.4

The NYC Inquiry recommends that Department of Education, Employment and Workplace Relations (DEEWR) 'participation compliance' policy be reviewed to achieve more appropriate responses to the income support needs of homeless young people.

Recommendation 19.5

The NYC Inquiry recommends that financial circumstances and homelessness be considered salient factors in discretionary decisions about any sanctions applying to the administration of Centrelink benefits.

19.62 Consideration needs to be given to the usefulness of Rent Assistance in the private rental market. It is currently too low to be of sufficient assistance for many and either should be raised in line with market rents or alternatives need to be considered. The vulnerability of the current policy balance has been revealed as rents have steeply risen in recent years.

Recommendations 19.6

The NYC recommends that national policy on youth homelessness establishes a different balance between rent assistance, supported accommodation and public and community housing to effect a lower reliance on rental assistance and greater access to affordable public and community housing stock.

Recommendation 19.7

The NYC Inquiry recommends a review of the level of rental assistance available to homeless young people be undertaken, with consideration given to a higher level of payment adjusted to state and regional rental variation.

19.63 In the past, Centrelink and its predecessor the Department of Social Security have been innovative in exploring appropriate ways of reaching hard to access groups such as homeless young people. In 1991, after the Burdekin Report, the Youth Pilot Projects (YPP) trialled new models of delivering services to homeless young people. In 1993, 10 permanent Youth Service Units were opened to follow up the outcomes of the Youth Pilot Projects. A similar approach to testing new and effective support models may need to be re-instituted.

ENDNOTES

- 1 Submission 44, Mission Australia.
- 2 National Welfare Rights Centre 2007 The independent social security handbook Online Edition, Welfare Rights Centre Ltd, Sydney, <www.welfarerights.org.au>, accessed 21-08-2007.
- 3 Note that those receiving Parenting Payment before 01-07-2006 are able to receive the payment if their child is less than 16 years of age.
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- 13 K. Holliday, Connect, Anglicare NT, Darwin Day 4, 04-04-2007.
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- 17 D. Curtis, Youth Accommodation Association of NSW, Sydney Day 8, 16-04-2007.
- 18 Young Person, Brisbane Day 6, 11-04-2007.
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- 21 Submission 56, Department of Housing and Works, Western Australian Government.
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- 23 Ibid.
- 24 Submission 78, UnitingCare Burnside.
- 25 G. James, North East Support and Action for Youth, Melbourne Day 14, 24-04-2007.
- 26 Submission 85, Council to Homeless Persons with Youth Affairs Council of Victoria and Project i (Key Centre for Women's Health in Society).
- 27 The exceptions are NSW, the ACT and the NT where it is 15 years.
- 28 See <www.det.wa.edu.au/schoolleavingage>, accessed 24-08-2007.
- 29 Submission 66, Homeless Persons' Legal Clinic, Queensland Public Interest Law Clearing House with Brisbane Youth Service, Salvation Army Youth Outreach Service, Australian Red Cross.
- 30 National Welfare Rights Centre 2007 The independent social security handbook Online Edition, Welfare Rights Centre Ltd, Sydney, <www.welfarerights.org.au>, accessed 21-08-2007.
- 31 Welfare Rights Centre Sydney (2002), Kicking them while they're down... Youth Allowance and youth poverty, National Welfare Rights Network, available at <www.welfarerights.org.au/policy/breachesfinal.pdf>, accessed 22-08-2007.
- 32 K. Day, Southern Youth and Family Services, Wollongong, Sydney Day 8, 16-04-2007.
- 33 Submission 67, Shopfront Youth Legal Centre.
- 34 Submission 13, Oenghus Youth Services and Alted Elizabeth College.
- 35 Submission 52, The Salvation Army (Tasmania).
- 36 K. Day, Southern Youth and Family Services, Wollongong, Sydney Day 8, 16-04-2007.
- 37 Submission 66, Homeless Persons' Legal Clinic, Queensland Public Interest Law Clearing House with

Brisbane Youth Service, Salvation Army Youth Outreach Service, Australian Red Cross.

38 Ibid.

39 Ibid.

40 Submission 89, Sonia James.

41 Ibid.