
cover the basics.

**Every South Australian should be
able to access life's basics**



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SACOSS is the South Australian Council of Social Service, the peak body for the non-government health and community services sector in South Australia. We envision a future of justice, opportunity and shared wealth for all South Australians. We believe that developing a fair and just community is possible. We believe that a thriving community sector will help to address poverty and disadvantage. And we will continue to speak with, alongside and for all South Australians – no matter who you are, where you live or what your current circumstances are.

p. (08) 8305 4222
e. sacoss@sacoss.org.au
w. www.sacoss.org.au

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the basics.

We are extremely lucky to live in a great state in a prosperous country – and that most of us can simply take this for granted. But despite our state's strengths and assets, many South Australians are still being denied life's basics. This needs to change.

In politics, and during election times in particular – state or federal – everyone is selling their version of 'the dream'. Rhetoric abounds ... A better, stronger state. A happy, resilient state. A state that bounces back, that grows and succeeds. That's future-focussed, and tech-savvy. A state full of jobs, jobs, jobs. A state that aims for the stars, and beyond.

We should dream big, but no one should be left behind either. For too many South Australians these aspirational visions are a far cry from their day-to-day reality. And generally, big-dollar commitments to new entertainment developments, business enticements, or big tax breaks, won't make their lives better.

SACOSS' call is much more modest – and also, much more fundamental. We are simply asking that our state government and policy makers step up to ensure that people's basic needs are met, through a range of state-level actions that will help reduce inequality, and make a genuine difference for people who are struggling. This call is ever more important as we grapple with the effects of, and recovery from, the COVID pandemic. We now know that COVID-19 has amplified inequality and fed off people's existing vulnerabilities – low incomes, poorer health and insecure work.

SACOSS has identified a range of areas where important life fundamentals are not currently being met, and we have some key recommendations for South Australia's political leaders to act on. We are urging all political parties and candidates to commit to take action which ensures the basic needs of all South Australians are being met, starting with the actions we ourselves have highlighted.

So, to our Government(s) and politicians, both existing and aspiring – let's make sure first and foremost, that we help everyone cover life's basics. And for all those making social policies, or judging policy plans or visions for the future – check that covering the basics is front and centre in any of those plans.



Ross Womersley
SACOSS CEO



David Panter
SACOSS Chair

“Overcoming poverty is not a gesture of charity. It is an act of justice. It is the protection of a fundamental human right, the right to dignity and a decent life.”

– NELSON MANDELA

basic requirements.

1. Rental affordability

The state government needs to act to make renting more affordable.

Key policy proposals:

- 1.1 Make a significant new investment to increase the net stock of public housing (investment to be at least equal to the Victorian package: pro rata = \$1.4bn over 4 years).
- 1.2 Implement minimum energy efficiency standards for private and public rental properties, and mandatory disclosure of energy efficiency ratings for all rental properties in South Australia.
- 1.3 Commit additional funding of \$64 million over four years for Housing SA and other community-based organisations to deliver a targeted energy efficiency program for public and community housing tenants.
- 1.4 Increase the renter payment rate of the Cost of Living concession to the homeowner level.

2. Digital inclusion

We need a plan and sustained investment to ensure no South Australian is left behind in the digital world.

Key policy proposals:

- 2.1 Commit to a set of digital inclusion goals or benchmarks for:
 - Minimum access to internet connections and devices for all South Australians.
 - Access to devices and data at home for all SA children in secondary school.
 - Access to adequate affordable data to enable people living with disability to use assistive technology appropriate to them.
 - Minimum requirements for public access points for internet facilities and secure, non-commercial public wi-fi.
- 2.2 Commit to a significant (\$120m) state government investment to implement a strategy to reach those goals.

3. Concessions

Our system of concessions needs to be fixed, so that everyone in South Australia who needs concessions can access them.

Key policy proposals:

- 3.1 Initiate a broad review of the concession system as a whole to ensure consistency, proper targeting and ease of access across the system.
- 3.2 Extend all concessions available to age pension recipients to other Centrelink recipients receiving lower payments (e.g. driver's licence and motor vehicle concessions, and Ambulance Cover)
- 3.3 Implement for all concessions an additional low-income eligibility criteria which is not based on receipt of Centrelink benefits.
- 3.4 *Ten specific concessions proposals:*
 - 3.4.1 Recognise both the Health Care and Low Income Health Care cards for eligibility.
 - 3.4.2 Recognise a range of concession cards for public transport, and waive fines if the person can show that they were eligible.
 - 3.4.3 Introduce free public transport for all South Australian children and young people until the end of their secondary education.
 - 3.4.4 Extend public transport concessions for seniors to all concessions holders.
 - 3.4.5 Lift the income cap for low-income eligibility for the Cost of Living Concession.
 - 3.4.6 Increase the Cost of Living Concession for renters to the level applying to home owners.
 - 3.4.7 Shift from a flat rate to a percentage-based energy concession.
 - 3.4.8 Increase the shared-householder income limits for the energy concession.
 - 3.4.9 Introduce partial energy and Cost of Living concessions for share-householders.
 - 3.4.10 Introduce an additional concessions eligibility criteria to allow access for asylum seekers.

4. Public health

We need to learn the lessons of COVID and invest in public health and prevention.

Key policy proposals (in association with the SA Public Health Consortium):

- 4.1 Increase public health, disease prevention and health promotion expenditure to 5% of the health budget.
- 4.2 Build the capacity of the public health workforce.
- 4.3 Introduce a floor price for cheap alcohol.
- 4.4 Establish independent state-wide monitoring for health inequalities.
- 4.5 Create healthier environments for children, particularly in relation to healthy diets.

Other SACOSS health policy proposals:

- 4.6 Ensure the continued provision of independent health research and data analysis through an adequately resourced Health Performance Council.
- 4.7 Extend the Ambulance Cover concession for pensioners to all those on equivalent/lower incomes.

5. Water

The government needs to fix drinking water supply to regional and remote South Australia.

Key policy proposals:

- 5.1 Undertake the following steps to ensure everyone in SA has access to safe and affordable water:
 - 5.1.1 Extend the scope of the planned water security stocktake of self-supplied remote communities to *all* remote communities, both inside and outside of SA Water's network.
 - 5.1.2 Develop a policy that outlines a basic level of service that the Government commits to not falling below, and apply it to all remote communities, both inside and outside of SA Water's network.

- 5.1.3 Work with communities to undertake water security planning in regional and remote communities.
- 5.1.4 Extend the application of the Community Service Obligations (CSOs) to all residential drinking water service providers.
- 5.1.5 Commit to interim measures to deliver clean and safe water to communities in need, until such time as sustainable access to safe water is established.

Other SACOSS water policy proposals:

- 5.2 Regulate for or commit to all Ministerial Directions for SA Water expenditure to be either funded directly from Treasury, or at least included in the regulatory review of SA Water's expenditure.
- 5.3 Revise legislation governing water supply charges for renters to align with other states and make landlords responsible for water supply.

6. Protection and support

Beyond covering the basics, SACOSS has highlighted a range of proposals which governments need to implement to protect and support vulnerable and disadvantaged South Australians.

A range of additional proposals are listed in the 'Protection and Support' section on pages 16-19. They encompass:

- 6.1 Policies to protect and support particular vulnerable and disadvantaged groups.
- 6.2 Policies to protect and support people with particular financial hardships.
- 6.3 Policies to protect and support people most at risk from climate change and natural disasters.
- 6.4 Policies to support the non-government health and community services sector in our work.

rental affordability.



The State Government needs to act to make renting more affordable.

Stable and secure housing is the primary platform for connection to economic and social community life, providing a base that enables people to overcome challenges and live a decent life. Increasing rents and house prices mean people struggle to stay housed, are forced to live in sub-standard homes or live far from jobs and services, and have difficulty covering other basic living costs.

Renters are particularly impacted by high housing costs as they are likely to have lower incomes, less wealth, and spend proportionately more of their income on housing costs. For many on particularly low incomes, rental housing is simply unaffordable (and home ownership is out of the question).

In this context, public housing is particularly important. It provides homes for those who are left out of the housing market and adds supply to the market to make housing more affordable for everyone. Its construction provides economic stimulus in the short term and it is a store of public wealth over the long term. However, the stock of public housing in South Australia has declined over recent decades, many of the houses are old and energy-inefficient, and there is a substantial waiting list for homes.

Renting, whether public or private, also creates other additional costs that at least some homeowners can avoid. For instance, solar power and energy efficiency improvements like double-glazing or insulation are at the owner's behest and are often not possible for renters. Tenants often have little choice and may find that once in a home they face crippling energy bills due to the thermal inefficiency of the housing and appliances. Low-income renters also receive a lower Cost of Living Concession than home-owners on similar incomes.

Background

In 2017-18, there were around 204,000 rental households in South Australia, making up 29.5% of the SA housing market. This proportion was slightly below the national average where 32% were renters.

Renters on low incomes struggle

Renters on low incomes particularly struggle with housing affordability. Of the 204,000 South Australian renter households, nearly 60% were in the bottom two income quintiles. Of those low-income renters, 32.4% or 39,556 households were in housing stress, that is, spending more than 30% of their income on housing costs. Almost all of these were in private rentals.

Using data from new rental bonds, SACOSS calculates that the median rental for a 2-bedroom unit in the cheapest Adelaide suburbs in the June Quarter this year was \$293 per week. It was \$385 for a 3-bedroom house. The data shows that these rental prices are unaffordable for people on low incomes looking to rent.

The proportion of private renters in the rental market is also increasing. In 1994-95, 56% of renters had private landlords. By 2017-18, it was 83% as public housing shrank to just 4.9% of the total number of houses.

We have less public housing and long wait lists

The total number of social housing dwellings in SA fell by 2,845 (5.8%) from 2011 to 2019 – the only Australian state to have an absolute decline in social housing numbers. Public housing dwelling numbers fell by 9,491 (22.8%) in the ten years to 2020 – some transferred to community housing, others simply lost to the social housing system. At 30 June 2020, there were 17,051 applicants on the public housing waiting list (excluding applicants for transfers between houses), including 2,721 new “greatest needs” applicants. The SA public housing waiting list equals 53% of total public housing stock: the third highest proportion in the country.

Policy prescriptions

1.1 Make significant new investment to increase the net stock of public housing (investment to be at least equal to the Victorian package: pro rata = \$1.4bn over 4 years).

Public and community housing is a key part of the provision of affordable housing. However, as noted earlier, the stock of public housing in South Australia has declined over recent decades, many of the houses are old and energy-inefficient, and there is a substantial waiting list for homes. As a response to the COVID pandemic, most other states have made significant new investments in public housing, with Victoria's \$5.3bn "Big Housing Build" being the largest investment. While SA still has proportionately more public housing than Victoria, there is great unmet need here and if Victoria can find money for public housing investment after all their lockdowns, South Australia should be able to make a proportionately similar investment in our public housing.

1.2 Implement minimum energy efficiency standards for private and public rental properties, and mandatory disclosure of energy efficiency ratings for all rental properties in South Australia.

Public and private rental properties in South Australia often have poor energy efficiency and may lack insulation, sufficient window coverings, draught proofing and heating and cooling. This can increase electricity costs for people to maintain sufficient temperatures in their homes, to keep cool in summer and warm in winter. There is often limited power for renters to request changes to the property they live in to make their tenancies more energy efficient or comfortable. To protect renters and ensure a base level of thermal comfort, the government should mandate minimum energy efficiency standards for all rental properties. Beyond minimum standards, there also needs to be mandatory disclosure of the energy efficiency rating of all rental properties. To be meaningful, the disclosure framework must apply at the point of lease for all properties – not be an opt-in voluntary system for landlords. There will also need to be protections against unfair rent increases with the implementation of minimum energy efficiency standards.

1.3 Commit additional funding of \$64 million over four years for Housing SA and other community-based organisations to deliver a targeted energy efficiency program for public and community housing tenants.

Energy efficient housing has been shown to reduce living costs and improve comfort levels for residential occupants, particularly in extreme heat and cold. Data from the National Social Housing Survey (2018) indicated that 4 in 10 social housing tenants, incorporating public, Aboriginal and community housing, said that their homes do not meet their needs for thermal comfort. In the national survey, SA had the lowest score for thermal comfort, indicating that social housing tenants are living in conditions that affect the health and wellbeing of tenants. Significant investment is required for Housing SA and other community-based social housing organisations to deliver a targeted energy efficiency program for social housing tenants. This could include retrofits of housing to seal windows and doors, replacing old insulation and upgrading heating, cooling and hot water systems in social housing properties.

1.4 Increase the renter payment rate of the Cost of Living concession to the homeowner level.

The Cost of Living Concession's origins as council rate relief continue to be reflected in the difference between payments for homeowners and renters. Tenants of rental properties who live on low incomes receive less than half the concession amount that home owner-occupiers receive, except for retirees. The different payment amounts imply that home owner-occupiers have higher 'costs of living' than renters, but the national data from the Australian Bureau of Statistics' (ABS) Household Expenditure Survey shows that this is not the case, while most economic analysis suggests that landlords pass on the costs of council rates – so there is no justification for the lower concession rate.



digital inclusion.

We need a plan and sustained investment to ensure no South Australian is left behind in the digital world.

Digital inclusion is about more than simply owning a computer or smartphone. It is about using online and digital technologies to access employment, education, training, commerce and government services – and to enhance quality of life. There is no doubt that digital technologies are now taking a key role in our economic and social life, but there is a “digital divide” where large numbers of people don’t have the online access or capability to take advantage of the technology.

As more people, more businesses and more government services go online, the disadvantages of being digitally excluded increase – the digital divide becomes narrower but deeper. This digital exclusion reflects and compounds other areas of disadvantage, with people on lower incomes, older people, and people living with disability all likely to be less included in the digital world.

The Australian Digital Inclusion Index (ADII) measures three key dimensions of digital inclusion (access, affordability and digital ability) on the basis of a range of survey questions relating to internet products, services and activities. The answers are then benchmarked against a “perfectly digitally included” individual, a hypothetical person who scores in the highest range for every question. In almost every iteration of the Index, South Australia scores poorly by comparison with the rest of country.

The fact that South Australia lags behind in digital inclusion has implications for our community and our future economic performance. We have an opportunity to address digital inclusion now and ensure that all South Australians can participate in our technologically-driven society, or we risk leaving many people behind.

Background

The COVID-19 pandemic has forced more interactions and services online. It has highlighted the potential to reach more people in more ways, but also how far those who are digitally excluded will fall behind.

Nationally, according to the Australian Digital Inclusion Index, digital inclusion is increasing overall – but in 2021, the lowest income households scored 15.5 points below the average digital inclusion score. Similarly, SACOSS’ research on waged poverty highlights exclusion issues, and that digital technology is becoming crucial for a wide range of jobs – including those not traditionally seen as part of the digital economy like retail, nursing, delivery, and social work.

SA’s ‘Digital Restart Fund’ has limited scope

The SA government recognises the importance of digital technology, and its 2020-21 budget included a \$120m investment in a Digital Restart Fund to improve government ICT and the public’s digital service access. This is a significant investment in government’s digital capacity and may improve the government/public interface. However, the scope of the Digital Restart Fund is limited as it does not ensure that citizens have access and skills to use the technologies and take advantage of improved government platforms. There are clear examples from other states where government digital investment goes beyond simply improving ICT and also improves digital inclusion in the community. A strong commitment from the South Australian government can help our state on the path to digital inclusion.

Government work towards a digital inclusion strategy

The SA Department of Premier and Cabinet has been undertaking development of a Digital Inclusion Strategy, co-designed with industry, the community sector and government. SACOSS has been involved in this co-design process and notes the enthusiasm and knowledge being shared by participants. This process presents an opportunity to address the deep-seated digital exclusion that is embedded in poverty and inequality, and to ensure digital readiness for our state.

SACOSS has identified crucial areas for commitment and investment – a set of goals that will help drive the digital inclusion agenda, ensuring people can keep up and stay engaged in our changing world.

Digital inclusion goals

All South Australians

- Have access to internet connections beyond their mobile phone
- Have a base level of digital competency as measured by an agreed framework
- Are able to access South Australian government websites and information without barriers of disability, language, cultural background or data cost.

All South Australian children in secondary school

- All South Australian children in secondary school have their own access to devices and data at home to enable them to do school work, research and assignments, and online schooling where necessary.

All South Australians living with disability

- All South Australians living with disability have access to adequate affordable data to enable the use of assistive technology appropriate to them.

Public access points

- Every suburb and regional town has at least one all-weather public internet access facility with computers, printers and long opening hours.
- All local government areas have at least one secure, non-commercial public wi-fi network accessible from multiple public venues.

Policy prescriptions

2.1 A commitment to a set of digital inclusion goals or benchmarks outlined by SACOSS (see left).

We hope that the goals we have listed here will form part of the state Digital Inclusion Strategy, or at least that the Strategy will take us toward those goals. And if so, we would want to see an investment of a similar size to the Digital Restart Fund (\$120m) to deliver on the goals and strategy.

2.2 A significant (\$120m) state government investment to implement a strategy to reach those goals.

We are hoping that the government's Digital Inclusion Strategy will take us toward the goals we have outlined, but in reality, any strategy is only as good as its implementation. Making progress on digital inclusion will require more than a strategy. It will require sustained investment by government and the community – to provide the public infrastructure and technology, to develop the skills and learnings needed to keep pace with new technologies, and to ensure that affordability, language or regional geography does not exclude anyone in our digital future.

As noted above, the state government has invested \$120m in its Digital Restart Fund aimed at improving its own information technology services (which will also benefit the online public), but it needs to invest a similar amount in supporting the community to get online.

concessions.

Our system of concessions needs to be fixed, so that everyone in SA who needs concessions can access them.

Like all state governments, the South Australian state government provides concessions for people living on very low incomes and struggling with affordability of essential services. Those who are eligible receive a discount, subsidy, rebate, or exemption from fees for goods or services, to assist people to get where they need to go, meet their basic needs, and live healthier lives.

Concessions are extremely important, and can make a huge difference in people's lives when they are struggling financially, or trying to get by on very little. But our concessions system in SA presents a complex patchwork of different payments with varying eligibility criteria. The system is complex to navigate, and worse, creates poverty premiums and barriers to accessing support.

“the analysis and resultant recommendations outlined in this report highlight the need to review and reform the concessions system as a whole to ensure it is as robust and responsive as possible.”

- *The State of Concessions in SA, 2021*

Concessions are meant to provide vital support for people living on very low incomes. This is an issue that affects people young and old – it doesn't discriminate. So just as it makes sense to have concessions available for age pensioners, it also makes sense to extend these concessions to other people when they are living on similar or lower incomes.

If we want a robust and responsive concession system, we must ensure that we do not leave any low-income groups behind. The bottom line is – you should be able to get concessions if you need them.

Background

Concessions are directed to low-income groups, but the eligibility criteria and application processes differ across each concession program and provider. This can make concessions difficult to navigate, and can have unintended consequences for users, or create barriers to accessing support.

In 2021 SACOSS published a major report, *The State of Concessions in South Australia*. The report examined 13 different state concessions and identified a range of instances of poverty premiums, where those on lower incomes (e.g. working age Centrelink payments) are denied concessions available to people on higher incomes such as the age pension.

The report also found that most concessions are not extended to people living on low incomes who are not receiving support from Centrelink – for instance, asylum seekers, or those in waged poverty whose main source of income is wages, but who are still living below the poverty line.

The report also detailed a range of unfair or, at times, arbitrary bureaucratic barriers to accessing concessions, while some people are locked out entirely by poorly targeted, or poorly designed eligibility criteria. For instance, having the wrong form of identification may lead to people missing out on concessions or paying fines on public transport, while people living in share households may be excluded from energy or Cost of Living Concessions by a housemate's income that they have no access to.



Policy prescriptions

3.1 Initiate a broad review of the concession system as a whole to ensure consistency, proper targeting and ease of access across the system.

The concessions system is broken: that was the conclusion of SACOSS' *The State of Concessions in South Australia* report. The system has grown through piecemeal reform, and so the report concluded that given the flaws that are now evident there is a need to review and reform the concessions systems as a whole. At the most basic level, the review would need to aim to remove poverty premiums and barriers to access. This would require a commitment to adopting the overarching recommendations below (extending all concessions available to age pensioners to other Centrelink recipients, and implementing an addition generic low income eligibility criteria). The review would also need to systematically address the range of other issues identified in the SACOSS report – as well as reviewing other barriers, gaps or inadequacies in support.

3.2 Extend all concessions available to age pension recipients to other Centrelink recipients receiving lower payments (most notably in relation to driver's licence and motor vehicle concessions, and to Ambulance Cover).

Concessions should be available on the basis of need, not based on particular income sources or types of payments. While most concessions are available to age pensioners, many are not available to Centrelink recipients whose incomes are lower than the age pension (e.g. those relying on JobSeeker, Youth Allowance, or a Parenting Payment). Concessions like Cost of Living, energy, water and public transport are available to a range of Centrelink recipients, but the eligibility requirements for all other concessions needs to be expanded to include other Centrelink recipients.

3.3 Implement an additional low-income eligibility criteria for all concessions which is not based on receipt of Centrelink benefits.

SACOSS' research on waged poverty showed that around one-quarter of South Australian households living below the poverty line have wages as their main source of income, and around half of these receive no Centrelink payments. Despite the number of people experiencing poverty who do not receive Centrelink payments, there are very few concessions available for those outside the Centrelink system.

We need an additional low-income eligibility criteria for all concessions, which is not based on receipt of Centrelink benefits. Eligibility could be based on the income thresholds set for the Commonwealth Low Income Health Care Card, with income evidenced by wage slips, tax returns or bank statements.

Ten specific concessions proposals to be addressed:

3.4.1 Recognise both the Health Care *and* Low Income Health Care Cards as valid forms of eligibility for a range of concessions, and allow cardholders to present their existing card as proof of their income status.

3.4.2 Recognise a range of concession cards for public transport, and waive concession-related transport fines after issue if the person can show that they were eligible (but just did not have documents).

3.4.3 Introduce free public transport for all South Australian children and young people until the end of their secondary education.

3.4.4 Extend public transport concessions for seniors to all concessions holders.

3.4.5 Lift the income cap for low-income eligibility for the Cost of Living Concession.

3.4.6 Increase the Cost of Living Concession for renters to the level applying to home owners.

3.4.7 Shift from a flat rate to a percentage-based energy bill concession.

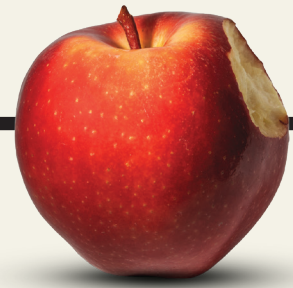
3.4.8 Increase the shared-householder income limit for the energy bill concession to at least the \$18,000 limit set for the Cost of Living concession, but preferably to the Low Income Health Care Card thresholds.

3.4.9 Introduce a partial energy bill and Cost of Living concession for people on low incomes sharing a house with people unrelated to them earning over \$18,000 (capped, if needed, at the average wage), with the amount based on the number of household members.

3.4.10 Introduce an additional concessions eligibility criteria to allow access for asylum seekers.

The rationales and details for these specific proposals is set out in the SACOSS *State of Concessions* report.

public health.



We must learn the lessons of COVID and invest in public health and prevention.

While the threat of COVID-19 remains an ongoing concern in South Australia and nationally, the health priorities of pre-COVID times continue to impact the health and wellbeing of our community. Chronic conditions such as cardiovascular disease, arthritis and diabetes remain priorities. Social inequity continues to contribute to significant preventable illness, and is a key driver of ill-health. Increased funding is required for preventative health approaches and policies that support education, employment and housing, as well as workforce capacity, to prevent and reduce the burden of illness and support the wellbeing of all South Australians.

The pandemic has provided global lessons on the importance of public health and prevention strategies, and the importance of health research, data analysis, and public access to health information. While Australia is rightly proud of its public health system, there are key areas that require improvement. Access and affordability of health services are a challenge for many people – examples include gap payments and ambulance fees. We need to assess what is working, and what is not, to learn, plan and invest appropriately to optimise the health of all South Australians

Background

On a range of health indicators, the most disadvantaged South Australians have poorer health outcomes than the most affluent. SACOSS' health advocacy utilises a "social determinants of health" approach in linking poverty with health and wellbeing outcomes. We focus on the importance of prevention, early intervention, access and equity. With this in mind, our report with the Southgate Institute for Health, Society and Equity at Flinders University, *The Heaps Unfair State*, provided a major stocktake of health issues in South Australia, examining why health inequities have increased and how this trend can be reversed.

South Australians need our government to create healthy public policies and initiatives that support people to live healthy and productive lives. This requires our government to invest in early intervention and prevention, to stem the tide of chronic disease, with wide-reaching and long-term positive impacts for both public health and the economy.

Policy prescriptions

In association with the SA Public Health Consortium we call for the following:

4.1 Increase public health, disease prevention and health promotion expenditure to 5% of the health budget.

South Australia is facing significant challenges with increasing demands on the health system, rising health care costs and a need to reprioritise the system to focus on prevention and improving the health of the whole population. We call on the government to increase investment in public health, disease prevention and health promotion, with an ongoing commitment of at least 5% of health expenditure directed towards disease prevention and health promotion. Such a benchmark is in line with targets in *Australia's National Preventive Health Strategy 2021-2030* and would see an increase from current levels of around 2.3% of total health expenditure. A commitment is also required to report annually on public health preventative expenditure.

4.2 Build the capacity of the public health workforce.

The response to COVID-19 has demonstrated the importance of public health workers, and the SA Public Health Consortium calls for a commitment to build the capacity of the public health workforce into the future and beyond COVID-19. This should include conducting a comprehensive review of the preventative health workforce in South Australia so as to provide a greater understanding of sector characteristics, core activities, and needs. Informed by the review, a dedicated employment, training and development program should be established to provide career pathways in health promotion and disease prevention.

4.3 Introduce a floor price for cheap alcohol.

The SA Public Health Consortium is calling for the introduction of a floor price for cheap alcohol products in order to reduce the harms caused by alcohol. There is strong evidence that setting a floor price for alcohol is one of the most efficient and cost-effective strategies to reduce consumption and harm. This would involve setting a minimum price per standard drink of alcohol that can be sold, thus increasing the price of cheap alcohol beverages (e.g. cask wine). The floor price should be regularly adjusted for inflation. This measure is expected to primarily impact off-licence sales (e.g. bottle shops) and have little impact on on-licence sales (such as bars, pubs or nightclubs), and is in line with directions in the *National Alcohol Strategy 2019-28* and the *National Drug Strategy 2017-2026*.

4.4 Establish independent state-wide monitoring for health inequalities.

The SA Public Health Consortium is calling for the establishment of an independent state-wide monitoring system to track health inequities and provide data in accessible formats (e.g. an online portal) to all sectors of government and the public. Such a system is needed to shine a light on where health inequities exist in South Australia, and to provide both an evidence-base to inform interventions, and a means of tracking progress over time. It would need to be led by an independent body, such as the Health Performance Council, and would utilise existing datasets and ongoing surveys within SA Health, as well as the collection and analysis of additional data (e.g. housing, employment, education, income and health care). The data and findings of this monitoring system will need to be reported on publicly in annual reports.

4.5 Create healthier environments for children.

The SA Public Health Consortium calls for a commitment to create healthier public environments for all children, particularly in relation to food marketing and the promotion of healthy diets. This includes phasing out all advertising of unhealthy food and drinks on government-owned property by 2025, as well as revising the *Right Bite Healthy Food and Drink Supply Strategy* for South Australian schools and preschools. This Strategy outlined criteria for school food supply, but was not mandated or monitored. It is now time to mandate a minimum of 60% high-nutrient category foods on school menus, with no low-nutrient excessive energy foods or

beverages. These initiatives must ensure that equity variations are addressed so that every child has access to healthy food and drink options.

Other SACOSS health policy proposals:

4.6 Ensure the continued provision of independent health research and data analysis through an adequately resourced Health Performance Council.

Given the persistent inequities across the health care system and the lack of inclusion of consumer perspectives about their health experiences and outcomes, it is essential that appropriate independent mechanisms are in place to enable people's voices to be heard, for public data to be collected, and for active and responsive independent health research and advocacy to be undertaken. In order to design and implement sound health policy and implementation strategies, informed by public engagement and input, it will be essential that adequate resourcing is provided to ensure the establishment of a reliable evidence base, in the form of high-quality information and data analytics, as provided by the Health Performance Council. The Council must be adequately resourced to continue to deliver independent health research and data analysis, and provide reliable information to the public, the community health sector, policy-makers and clinicians.

4.7 Extend the Ambulance Cover concession for pensioners to all those on equivalent/lower incomes.

Ambulance fees are set by regulation and are flat rate fees depending on the type of service. At over \$1,000 for an emergency response with transport to hospital, such flat rate fees are regressive (accounting for a higher proportion of income for low-income households) and cause financial hardship at a time of household stress. SACOSS has previously called for free emergency ambulance services in South Australia, and this remains our preferred policy position. However, at a minimum, the poverty premium in the Ambulance Cover scheme should be removed. Ambulance Cover provides for free ambulance services, but the concession of \$35 on the annual fee for a single person is only available for age pensioners and veterans. The concession should be extended to those on lower incomes such as JobSeeker, Parenting Payment or Youth Allowance.

water.

The State Government needs to fix drinking water supply to regional and remote areas.

Water is essential for life and health. It is a basic human right and is essential for social, economic and cultural wellbeing. Yet not all South Australians have reliable access to safe and affordable drinking water. This is particularly an issue for some regional and remote communities. These communities face specific issues and challenges when it comes to the provision of water services, including small economies of scale, poor quality water sources, ageing infrastructure, and high operating costs. Fragmented arrangements for service delivery in remote and regional water services contribute to policy inconsistencies, leaving some under-served communities with poor (sometimes unsafe), unreliable and high-cost water services.

“Reforms over the last 20-30 years have improved the security, reliability and relative affordability of water for most South Australians. However the challenges faced by regional and remote communities have not been adequately addressed, and many still do not have secure and reliable access to the most basic of water services.”

- *Falling through the gaps, Aither 2021*

Some residential customers who are not part of the SA Water network are paying up to 5 times the price of water compared to SA Water customers. Others are dealing with substandard or unreliable water. The true scope of the problem is an unknown. We need a comprehensive stocktake of water arrangements across the state to identify what is needed where, and the level of funding required to fix the problem and meet this fundamental need.

Background

In South Australia, there are some under-served communities, particularly in regional and remote areas, without reliable access to safe and affordable drinking water.

Fragmented water service arrangements

While SA Water provides drinking water for a large majority of the state, approximately 4000 people are serviced by a mix of local councils, private providers or have developed a self-sufficient supply structure ('self-supplied communities'). Significantly, this includes Aboriginal people living in remote communities who already have poor health outcomes, exacerbated by a lack of access to safe and secure water.

Statewide pricing excludes small providers

The SA Government's state-wide pricing policy means that most customers pay the same price per kilolitre of water in all metropolitan and regional areas in the SA Water network. However, while the provision exists for the State Government to extend this policy to small providers, it currently does not – meaning that communities reliant on other providers are often either paying more than the state-wide price for water or are receiving substandard services.

Current state government policy response

The State Government has committed to undertaking a water security audit for 'self-supplied' remote communities. This is a welcome starting point to better understand existing water supply arrangements, short and long-term risks, and potential investment options to secure water into the future. However, not all communities are included in this audit and a comprehensive state-wide stocktake of regional and remote communities' water services is needed to gain a holistic understanding of the state of play, systemic challenges, and the level of investment required to address the issues in a co-ordinated and strategic way.

Recent commitment to a basic level of service

SACOSS welcomes the State Government's commitment to developing a standard for a basic level of safe and reliable drinking water for self-supplied remote communities by 2022, as part of the state's Implementation Plan for the National Agreement on Closing the Gap. This would enable conversations between communities, government and service providers about how basic water needs can be met under all circumstances (drought and 'normal' times). However, such a basic level of service needs to be applied across all regional and remote SA communities, not just those which are self-supplied. Without a state-wide approach, there is the risk of further fragmenting decision-making and deepening inequities.

State Government must commit to interim measures

Upgrading water infrastructure, and the associated planning, takes time. The State Government needs to commit to interim measures to deliver clean and safe water to communities in need (e.g. subsidising bottled water, water carting, and other non-network solutions). This will ensure that no further negative health impacts occur from poor quality water.

Policy prescriptions

5.1 Fix the drinking water supply to regional and remote South Australia.

The State Government must commit to a range of actions to ensure that no South Australian is left behind when it comes to access to safe, affordable drinking water. SACOSS is calling for the State Government to:

5.1.1 Extend the scope of the planned water security stocktake of self-supplied remote communities to all remote communities, both inside and outside of SA Water's network

5.1.2 Develop a policy that outlines a basic level of service that the Government commits to not falling below, and apply it to all remote communities, both inside and outside of SA Water's network.

5.1.3 Work with communities to undertake water security planning in regional and remote communities.

5.1.4 Extend the application of the Community Service Obligations (CSOs) to all residential drinking water service providers.

5.1.5 Commit to interim measures to deliver clean and safe water to communities in need, until such time as sustainable access to safe water is established.

Other SACOSS water policy proposals:

5.2 Regulate for or commit to all Ministerial Directions for SA Water expenditure to be either funded directly from Treasury, or at least included in the regulatory review of SA Water's expenditure.

Funding the costs of Ministerial Directions through Regulatory Determinations is not in the long-term interests of consumers – it results in costs that are not publicly scrutinised and are hidden in customers' bills. SA Water's Regulatory Determination for 2020-2024 included over \$461 million in unscrutinised SA Water expenditure directed by the Minister for Environment and Water, which will be recovered from SA Water customers through their water bills in the next four years. Best practice regulation depends on certainty, transparency and community benefit. Consumers should pay no more for water than is allowed by the Essential Services Commission of South Australia, exercising its independent, statutory decision-making powers. Expenditure directed by the Minister should not be recovered from water consumers, but rather should be funded from treasury, or at a minimum, scrutinised by the Commission.

5.3 Revise legislation governing water supply charges for renters to align with other states and make landlords responsible for water supply.

Water is an essential service and, as a regressive expenditure, it is a particular impost on the budgets of low-income households. One simple way to reduce this cost for tenants, who tend to have lower incomes, would be to make landlords responsible for water supply charges. In a modern country, a house without water supply is not habitable, so the water supply should be the landlord's responsibility. This was the case prior to March 2014 when legislation was changed (without much discussion or explanation) to make tenants responsible for the supply charges by default (as well as usage). SA is the only state in Australia where the costs of water supply are charged to the tenant.

protection & support

protection & support.

Beyond the covering the basics, SACOSS has highlighted a range of proposals which need to be adopted and implemented to protect and support vulnerable and disadvantaged South Australians.

Social protections

Policies to protect and support particular vulnerable and disadvantaged groups:

6.1.1 Commit to passing legislation to raise the age of criminal responsibility from 10 to at least 14 years of age, without exception.

The right to a childhood is a basic one. Criminalising any child, and especially children who are under the age of 14, should have no place in our society. Yet, under the South Australian *Young Offenders Act 1993*, children as young as ten can be detained. This has long-term harmful and accumulative effects that can compound past trauma and detrimentally impact the rest of children's lives. It also places them at risk of becoming chronic, long-term offenders. We know that Aboriginal young people are disproportionately affected by the youth justice system, and are 21 times as likely to be under supervision as non-Aboriginal young people. We call on the State Government to adhere to international conventions and the principle of the best interests of the child; change the age of criminal responsibility from 10 to at least 14; and ensure that alternatives to detention are made available, in the form of therapeutic services, and diversionary programs that invest in child-centred and community-focused solutions.

6.1.2 Provide more detail and regular public reporting about meeting Closing the Gap commitments to reduce the incarceration of young and adult Aboriginal people by 30% and 15% by 2031.

A key theme of the Royal Commission into Aboriginal Deaths in Custody was that imprisonment should be a sanction of last resort, yet Aboriginal people remain hugely over-represented in the prison population.

The National Agreement on Closing the Gap has targets for reducing the incarceration rate of young and adult Aboriginal people by 30% and 15% respectively, by 2031. While there is a South Australian implementation plan for the agreement, the government needs to provide more detail, timelines and identified resource allocations to meet the Closing the Gap commitments.

6.1.3 Provide the option of extended care from 18 to at least 21 years for all young people leaving care, including those in residential care.

When a young person in residential care turns 18 years of age, the departmental authority and support payments currently cease. However, the vulnerability of young people in out-of-home care does not end at the age of 18 when formal care is discontinued. The importance of extended care has been recognised by the South Australian government, as reflected in the Stability in Family-Based Care program, enabling family-based carers to access fortnightly carer payments to support the young person until they turn 21. However, similar arrangements are not available to young people leaving residential care once they turn 18. Aligned with the Home Stretch Campaign, SACOSS is calling for the SA Government to provide the option of extended care from 18 to at least 21 years for *all* young people leaving care, including residential care, in line with *Children and Young People (Safety) Act 2017*.

6.1.4 Review the impact of the introduction of the “fee for service” model on access to (and use of) the Communication Partner Service in police interviews and court hearings.

The Communication Partner Service assists people with complex communication needs to provide an accurate and coherent account of their experiences in police interviews and court proceedings. In March 2020 a new service model was introduced, with the professionals providing the service being engaged on a fee-for-service basis. Some disability advocates have raised concerns with SACOSS that the new model provides barriers to accessing the service. Given it is a new model, it is also good practice to review the changes after two years. SACOSS is calling for a review of the service model changes to ensure there has been no loss of access and that the service is providing the support needed.

Financial assistance

Policies to protect and support people with particular financial hardships:

6.2.1 Remove the \$20.90 charge imposed on payment plans for state government fines.

If someone can't pay an SA state government fine when it is due, they are able to apply to go on to a payment plan. However, the Fines Unit imposes a charge of \$20.90 on the application for a payment plan. This is an impost on people who were unable to pay a fine and a potential barrier to paying the fine, thus risking further enforcement action. It is also a poverty premium, as people with higher incomes are more likely to be able to pay fines when they are due, and would cause outrage if adopted by energy or telecommunications companies.

6.2.2 Remove the Victims of Crime Levy on expiation notices for those in receipt of Centrelink payments or an SA government concession.

SACOSS has long called for income-based fines because, unlike the current system of flat-rate fines, they provide an equal disincentive to wrong-doing and do not impose a poverty premium and hardship for those on low incomes, for whom fines are often a massive proportion of income. While this remains our preferred approach, we recognise the practical difficulties of identifying income (particularly for a state government when the Commonwealth controls income tax). However, the proposal to remove the Victims of Crime levy on expiation notices for people receiving Centrelink payments (or with an SA government concession) overcomes these barriers, and would be a step toward a fairer fines system. The fine could be issued with the levy, but with a notice to apply for a waiver for those on income support or concessions. It is only proposed that this be applied to expiation notices, not to the levy attached to more serious offences.

6.2.3 Review eligibility criteria for the Emergency Electricity Payment Scheme (EEPS), with a view to raising the debt cap and ensuring those on hardship programs are not prevented from eligibility or referral.

The EEPS provides assistance to households in a financial crisis who are unable to pay their electricity debt. Currently, the assistance is a \$400 payment, once every three years – on application from a financial counsellor. However, to be eligible, customers must

be the account holder, must not have an energy debt greater than \$2,000, and must be disconnected or at risk of disconnection. This can exclude customers of embedded networks (e.g. in caravan parks or apartment blocks), most customers with long-term energy debt, and customers on payment plans or hardship programs. These barriers need to be removed. The Victorian Utility Relief Grants Scheme provides a good benchmark, with much broader eligibility criteria and greater support: \$650 for each utility (water, electricity, gas) every two years, or \$1300 every two years if the customer only has one form of energy.

6.2.4 Require all retailers to participate in pre-disconnection for non-payment site visit programs for all customers, irrespective of meter type.

Disconnection of a household's energy supply for non-payment is nearly always the outcome of a customer not being able to meet their energy costs, and should be viewed as a last resort – occurring (if at all) only after retailers have offered payment plans, hardship programs and followed all other regulatory requirements. The number and type of disconnections in SA points to a failure on behalf of retailers to help customers manage their debt, and maintain a connection to their energy supply. SACOSS seeks that, ultimately, there be no disconnections for non-payment, but in the interim is calling for the SA government to mandate a "knock before you disconnect" program to ensure there is active personal engagement with all customers faced with potential disconnection, including customers with smart meters. The two 'knock before you disconnect' pilot programs from SA Power Networks and Essential Energy prove that personal contact prior to disconnection links customers with supports, and avoids disconnection and reconnection fees, as well as the significant distress caused by living without an energy supply.

6.2.5 Legislate to void any requirement for mandatory gas connections in new residential developments.

There is now clear evidence that for new houses, all-electric households are cheaper to run in the medium term-long term. The Grattan Institute suggests that running a new Adelaide house on all-electric would save up to \$2,183 over 10 years (with electric cooking and hot water), and up to \$5,556 over 10 years (with electric cooking, hot water and space heating). But developers of new residential estates are often including terms in sales contracts mandating gas connection. This deprives new owners of choice and locks in more expensive energy provision for those households.

Climate change and disaster resilience

Policies to protect and support people most at risk from climate change and natural disasters:

6.3.1 Implement a percentage-based concession scheme for home, contents, and vehicle insurance for people on low incomes, and resource non-government organisations to facilitate access to the concessions for communities that would benefit.

Affordability of home, contents, and vehicle insurance premiums is a major barrier to insurance take-up for people on low incomes. We know that natural disasters are increasing due to climate change – and that people on low incomes are more likely to live in areas with higher risk of natural disasters because the housing tends to be cheaper. They are also less likely to have the power or resources to engage in mitigation. Meanwhile, financial strain on households has increased during the COVID-19 pandemic, and insurance premiums have been rising (in Adelaide, they have doubled since 2000). There is a real risk of a large number of people falling into poverty, or having their poverty entrenched, in future natural disaster seasons. SACOSS is calling on the SA government to implement a percentage-based concession scheme for home, contents, and vehicle insurance for people on low incomes, modelled on the existing cost of living concessions. If concessions are introduced, the government should resource partner non-government organisations to facilitate access to the concessions for communities that would benefit from the support, as Victoria has done with the Power Saving Bonus.

6.3.2 Establish and fund a disaster resilience and risk reduction fund to be managed by the People at Risk in Emergencies Action Group.

Climate change is increasing the intensity and frequency of bushfires and extreme weather events, but the impacts are not felt by all people equally. People experiencing poverty, poor health, frailty and disability bear the greatest burden and are most at risk. SACOSS is proposing an investment of \$5m over 4 years to identify and address risks for people who may be more vulnerable to the impacts of climate change and to improve the environmental sustainability of the health and social service sector that supports them.

This fund would be managed by the People at Risk in Emergencies Action Group and administered through a member organisation.

6.3.3 Amend the *Climate Change and Greenhouse Emissions Reduction Act 2007* to include a representative of the non-government health and community services sector on the Premier's Climate Change Council, with the appointment to be made after consultation with SACOSS.

The Premier's Climate Change Council provides independent advice to the Minister about matters associated with reducing greenhouse gas emissions and adapting to climate change. While business, local government and environmental sectors are represented on the Council, there is currently no voice on the Council for the interests of South Australians living with poverty and disadvantage, who will be most impacted by climate change and natural disasters, nor a voice for our sector, which supports them. As significant stakeholders in our state's response to climate change and building disaster resilience, the non-government health and community services sector should be represented on the Council. As the peak body for our sector, SACOSS should be consulted about the appointment of a person from our sector, as is the case where other peak bodies are consulted about appointees from the local government and environment sectors.

Sector support

Policies to support the non-government health and community services sector in our work:

6.4.1 Legislate and provide seed-funding for a portable long service leave scheme for all SCHADS workers in SA.

The not-for-profit health and community services sector employs over 35,000 people in South Australia, but many are employed as casuals or on fixed-term contracts. This reflects the government funding models with fixed-term contracts, but the result is that employees change jobs regularly and lose entitlements. Their time of “continuous service” starts over with each new job, and some never get the respite of long service leave despite years of service to the South Australian community. Victoria, Queensland and the ACT have now introduced portable long service leave schemes where entitlements accumulate with continuous employment across the sector (even if you change employers). There are different models to examine, but most are largely self-funding over time. We need a commitment in principle to implementing a portable long service leave scheme for workers employed under the SCHADS (Social, Community, Home Care and Disability Services) Award, and then a study and a collaborative process to work out the details of the system to be legislated.

6.4.2 Fix the definition of electoral matters and political expenditure in the *Electoral Act*, and/or exempt ACNC-regulated charities from SA election expenditure disclosure

Transparency in election campaign funding and expenditure is an important part of the democratic process, but the current SA electoral law is unclear about what activities the disclosure laws applies to, and it conflates activities aimed at influencing the electoral process with policy advocacy around issues. The result is that many charities and peak bodies who want to raise concerns about issues impacting on vulnerable and disadvantaged South Australians may be forced into time-consuming, invasive and often irrelevant reporting. Charities are already transparently regulated at the national level by the Australian Charities and Not-for-Profit Commission and can't have a purpose to gain or prevent people's election, so the application of the *Electoral Act* here is burdensome and unnecessary.

SACOSS worked with the Conservation Council of SA to propose solutions when an electoral amendment bill was being developed in 2021, but that bill has now lapsed. Accordingly, we call for the next parliament to amend the *Electoral Act* to properly define electoral matters and political expenditure (separate from policy advocacy) and exempt charities policy advocacy from the disclosure provisions.

6.4.3 Implement a broad-based, collaborative review of the *Associations Incorporation Act*.

The *Associations Incorporation Act* is the legal instrument which enables incorporation of many charities and community organisations under South Australian law and it sets the rules for what is possible and not possible for associations. The Act had not been reviewed from 1997 until 2021, when a wholly inadequate review was undertaken *within* the Attorney-General's department. The result was an amendment bill which was fundamentally flawed, although rescued somewhat by subsequent consultation. However, that bill has now lapsed and there remains a need for a broad-based collaborative review to strengthen and modernize the scope and operation of the Act, and to address problems identified with existing provisions.

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6. Protection and support

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If any material in this document may be considered electoral content, it is authorised by Ross Womersley, 47 King William Road Unley, SA 5061, on behalf of the South Australian Council of Social Service.

**Basic needs
are a basic
requirement.**



South Australian Council of Social Service

**47 King William Road
Unley, SA, 5061 Australia**

p (08) 8305 4222

f (08) 8272 9500

e: sacoss@sacoss.org.au

w. sacoss.org.au

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 **linkedin.com/company/SACOSS**

SACOSS acknowledges traditional owners of country throughout South Australia, and recognises the continuing connection to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures, and to elders past, present and future.