



**SACOSS**

*South Australian Council  
of Social Service*

# The State of Concessions in South Australia

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**Poverty Premiums &  
Barriers to Access**

2021



*The State of Concessions in South Australia: Poverty Premiums and Barriers to Access*  
First published in October 2021 by the  
South Australian Council of Social Service

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This work can be cited as: Marks, S. and Ogle, G. 2021, *The State of Concessions in South Australia: Poverty Premiums and Barriers to Access*, South Australian Council of Social Service, Adelaide.

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## About SACOSS

The South Australian Council of Social Service is the peak representative body for the non-government health and community service sector in South Australia, and has a vision of justice, opportunity and shared wealth for all South Australians.

SACOSS undertakes policy and advocacy work in areas that specifically affect vulnerable and disadvantaged people in South Australia, and aims to promote fair and just access to the goods and services required to live a decent life – particularly where the cost of basic necessities impacts greatly, and disproportionately, on vulnerable and disadvantaged people.

SACOSS has a membership base of around 200 people and organisations from a broad cross-section of the social services arena. Members of our organisation span both small and large agencies, peak bodies, service providers, and individuals. SACOSS is part of a national network, consisting of Australian Council of Social Service and other State and Territory Councils of Social Service.

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## Executive Summary

The concessions system is meant to provide support for those in our community living on very low incomes and struggling with affordability of essential services. Concessions assist many people on low incomes to get where they need to go, meet their basic needs, and live healthier lives. However, the concession system itself is broken. Despite efforts to reform concessions administration, the system retains the markers of its piecemeal development over time and is an often-incomprehensible patchwork of different payments with varying and sometimes arbitrary or poorly targeted eligibility criteria.

Concessions are directed to low-income groups, but the eligibility criteria and application processes differ across each concession program and provider. This makes concessions complex to navigate and can have unintended consequences for users, including where poor targeting creates poverty premiums and those on lower incomes are denied concessions which are available to those on higher incomes. This is particularly the case where age pensioners, whose weekly income is significantly above that of many other Centrelink recipients, are able to access a range of concessions which are not available to those on lower incomes.

For instance, age pensioners are entitled to driver's licence and motor vehicle registration concessions, ambulance cover discounts, and access to the Switch to Solar program, which those on lower paid Centrelink allowances are not able to access. Further, those on very low incomes who are not receiving Centrelink payments miss out on even more concessions as they are not eligible for public transport concessions or the Glasses SA scheme.

As a matter of principle, **SACOSS believes and recommends that all concessions available to age pensioners should be made available to all those on lower or equivalent incomes.**

These issues are not the only poverty premiums in the system. For instance, the Cost of Living Concession provides a lower concession payment to renters than homeowners. This is despite renters often having lower after-housing income than homeowners receiving the same base income. Renters are also likely to have less wealth and less ability to utilise technology to avoid costs in areas like energy and telecommunications. Similarly, public transport concessions provide greater access to free transport for Seniors than for other concession recipients, and the Energy Bill concession is simply poorly targeted and does not maximise assistance to those who need it most.

Beyond these poverty premiums, many concessions contain a range of, at times, arbitrary bureaucratic requirements for accessing concessions. These in-built barriers to accessing support can leave those facing challenging circumstances out in the cold. Examples include having to apply for separate proof of eligibility for different authorities, or where similar Health Care cards are not both considered valid. Asylum seekers and those living in shared housing also face specific additional barriers where concessions' eligibility criteria are not designed for their circumstances.

These challenges reflect a need for genuine holistic review and reform – where the concessions and the assumptions they communicate are examined as a system to ensure that ultimately, people who need concessions are able to receive them. This report calls for

and begins to make a contribution to that reform process by highlighting where concessions create poverty premiums and where there are significant barriers to access. Based on this analysis, we make a series of recommendations for change in order to make the concessions system more effective and responsive to the people most in need of support.

## Recommendations

This report makes three over-arching recommendations to ensure a more robust and responsive concessions *system*, as well as a series of smaller changes to specific concessions, detailed in Table 1 and Table 2. These changes would address poverty premiums and barriers to access that are inherent within the existing eligibility criteria or payment rates for current concessions.

Firstly, SACOSS recommends that **the state government initiate a broad review of the concession system as a whole to ensure consistency, proper targeting and ease of access across the system.**

Secondly, we recommend **extending all concessions available to age pension recipients to other Centrelink recipients receiving lower payments.** This simply requires adding these other payments into the eligibility criteria, and would apply most obviously to driver’s licence and motor vehicle concessions, and to ambulance cover.

Thirdly, we recommend **implementation for all concessions of an additional low-income eligibility criteria which is not based on receipt of Centrelink benefits.** Such a standard low-income eligibility provision would support those living in waged poverty or otherwise outside the Centrelink system, and eligibility could be based on the income thresholds set for the Commonwealth Low Income Health Care card.

Beyond these over-arching changes, the series of smaller changes that SACOSS recommends are outlined in Table 1 and Table 2 and are aimed at achieving immediate concession reform, in addition to broader systems reform.

**Table 1: Recommendations to remove poverty premiums**

Concession	Recommendation
Public transport	Extend available public transport support for Seniors to all passengers who meet requirements for concession travel.
Public transport	Introduce free public transport for all South Australian children and young people until the end of their secondary education.
Cost of Living	Increase the renter payment rate of the Cost of Living concession to the homeowner level.
Cost of Living	Lift the income threshold for the low-income provision eligibility criteria to match the threshold for the Low Income Health Care card.
Energy Bill	Shift from a fixed rate to percentage-based energy bill concession.

**Table 2: Recommendations to remove barriers to access**

<b>Concession</b>	<b>Recommendation</b>
<b>All concessions</b>	Introduce to all concessions an additional eligibility criteria which is purpose-built for asylum seekers to enable asylum seekers on low incomes to qualify for those concessions.
<b>Cost of Living; Energy Bill; Water and sewerage; Emergency Services Levy; Residential parks; Medical heating and cooling</b>	Recognise both the Health Care and Low Income Health Care cards as valid forms of eligibility and allow cardholders to present their existing card as proof of their income status.
<b>Energy Bill</b>	Amend 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.
<b>Energy Bill and Cost of Living</b>	Introduce a partial concession for individuals living on low incomes who share a house with people unrelated to them earning over \$18,000 (capped, if needed at the average wage), with the amount of the concession based on the number of household members.
<b>Public transport</b>	Recognise a range of adult concession cards as proof of eligibility to travel on public transport with a concession ticket.
<b>Public transport</b>	Allow concession holders to waive concession-related transport fines after-issue if they can prove their eligibility.



## Introduction

Like all state governments, the South Australian state government provides concessions to individuals, families, households, or organisations who can demonstrate low income, special needs, or disadvantage. Those who are eligible receive a discount, subsidy, rebate, or exemption from fees or goods or services that the relevant government has jurisdiction over. These discounts and subsidies are important for helping people living on low incomes meet their basic living costs and for enabling social participation.

The provision of concessions arose out of attempts to lower the cost of essential needs for pensioners and people with disabilities and was initially focused on transport and health (SACOSS, 2008). Other concessions aimed at additional low-income groups were added over time – creating a concession ‘system’ that can be piecemeal and resemble an inaccessible and incomprehensible patchwork.

According to their website, the South Australian Government provides the following range of concessions to assist in alleviating costs of living pressures for low-income households, and particularly those associated with health issues, utilities, and transport (Government of South Australia, 2021).

**Table 3: Concessions provided by the South Australian government**

Concession	Benefit
<b>Cost of Living</b>	\$217.20/year for homeowner-occupiers or \$108.60/year for tenants and self-funded retiree owner-occupiers.
<b>Energy Bill</b>	Up to \$231.41/year.
<b>Water and sewerage</b>	\$200.90-\$320.30/year for homeowner-occupiers or \$130.30-\$249.80 for tenants.
<b>Public transport</b>	50% discount on fares, free off-peak travel, or free travel depending on eligibility category.
<b>Driver’s licence and vehicle registration</b>	At least 50% discount on licence and registration and stamp duty exemption on compulsory third party insurance.
<b>Emergency Services Levy remission</b>	Remission on Emergency Services Levy, up to \$46/year.
<b>Ambulance cover</b>	Discount on ambulance cover membership, \$35.50 for singles and \$71 for families.
<b>Switch for Solar</b>	Solar PV system installed in exchange for concession remission.
<b>Residential parks</b>	Either \$554/year for those who own their dwelling or up to \$363.90/year for tenants who pay for water and energy.
<b>Funeral Assistance SA</b>	A basic funeral service provided at no cost.
<b>Glasses SA</b>	Discounted glasses (frames and lenses).
<b>Medical heating and cooling</b>	\$233.60 per year.
<b>Personal alert systems rebate</b>	Assistance with costs of personal alert systems.

All these concessions are directed towards low-income groups, but eligibility criteria and application processes differ across each concession program and provider. This makes concessions complex to navigate and can have unintended consequences for users, including poor targeting and design where concessions are offered to those who need less help - leaving others with lower income or greater need behind.

This report focuses on concessions made by the South Australian Government to individuals and households that create poverty premiums or contain significant barriers to access. The concessions that create poverty premiums are discussed first, followed by those that have significant access barriers. These concessions require immediate attention to rectify instances where people in need of assistance are unable to access support or incur additional costs, deepening the effects of living in poverty. More broadly, 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. A reform process should lead to extending concessions received by age pensioners to other Centrelink recipients on lower payments and to other low-income groups not receiving Centrelink payments.

## Poverty Premiums

The struggle to make ends meet on a low-income, and particularly on a social security payment, is compounded by ‘poverty premiums’ – a range of extra costs which accrue, simply because a person lives on a low income. Examples include:

- incurring extra expenditures when unable to afford money-saving technology;
- fees and charges that are more often applied to those in living in poverty than the rest of the population;
- higher unit costs for smaller expenditures; and,
- flat fees and charges which account for a higher proportion of income for those in poverty than average households.

People who are living in poverty are required to pay these extra costs that others with higher incomes or more resources can buy their way out of, avoid or minimise.

These poverty premiums are important in the context of concessions because as the table below shows, not all South Australian concessions are available to all those on low incomes.

**Table 4: Eligibility for Concessions**

	Age Pension	Working age Centrelink payment	Low Income Health Care Card	Other low-income provision	Asylum seekers
Cost of Living	✓	✓	✓	✓	✓
Energy Bill	✓	✓	✓		✓
Water and sewerage	✓	✓	✓	✓	✓
Public transport	✓	✓			✓
Driver’s licence, vehicle rego	✓				
Emergency Services Levy	✓	✓	✓		
Ambulance cover	✓				
Switch for Solar*	✓				
Residential parks	✓	✓	✓		
Funeral Assistance SA	✓	✓	✓	✓	✓
Glasses SA	✓	✓			
Medical heating and cooling	✓	✓	✓		
Personal alert systems	✓				

\*Recipients of Disability Support Pension and Widow Allowance are also eligible for the scheme.

This table shows the patchwork of eligibility referred to in the introduction above, but is important in the context of poverty premiums because the age pension is a significantly higher income than other Centrelink payments. For instance, when supplements are included single JobSeeker recipients with no children receive \$161.95 a week less than single age pensioners (with pension supplement) (Services Australia, 2021). The result is that those on the lowest incomes do not have access to the same concessions or the same level of concessions as those who are on comparatively higher levels of income support – meaning that, all other things being equal, the cost of services to those on the lowest income is higher than those with more income. This is a clear poverty premium paid by those on the lowest incomes.

The following pages provide specific examples of these and other poverty premiums, but this provision of concessions to age pensioners while excluding others on lower incomes is one of the most problematic issues in the concessions system. To fix this systemic problem, SACOSS is making two over-arching systems recommendations. The government should **extend all concessions available to age pension recipients to other Centrelink recipients receiving lower payments**. This simply requires adding these other payments into the eligibility criteria for all concessions in the same way as is done with concessions like Cost of Living, energy, water and public transport.

However, SACOSS’ research on waged poverty showed, 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 (Law, et al., 2019). Accordingly, simply extending eligibility for concessions to all Centrelink recipients will not make those concessions available to all those households on very low income. To address this, SACOSS is recommending the **implementation for all concessions of an additional low-income eligibility criteria 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 (see Table 5 below), with income evidenced by wage slips, tax returns or bank statements. This application process would be similar to existing requirements for Funeral Assistance SA concession, and would circumvent existing barriers in some concessions eligibility that rely on information sharing or cards issued by the Federal Government.

**Table 5: Income caps, Low Income Health Care card**

Status	Weekly income	Annual income
Single, no children	\$636.00	\$33,072
Couple combined, no children	\$1,094.00	\$56,888
Single, 1 dependent child	\$1,094.00	\$56,888
Couple combined, 1 child	\$1,128.00	\$58,656
For each extra child, add	\$34.00	\$1,768

These two over-arching recommendations will make the concessions system fairer, better targeted and easier to navigate. However, these changes do not address all the poverty premiums in the system, and the following sections discuss poverty premiums created by particular concession programs, where poor targeting excludes some groups on lower incomes than those who are eligible for the concessions, thus making services more expensive to access for those on the lowest incomes.

## Transport discounts

Transport is the third largest expenditure for South Australian households (after housing and food), accounting for 14.5% of the average household budget (ABS, 2017). For those on low incomes, transport concessions are crucial to make transport more affordable and help people get where they need to go to participate in our society. The South Australian government makes the following transport available.

**Table 6: SA transport concessions**

Concession	Eligibility and benefits
<b>Licence and registration</b>	At least 50% discount for pensioner concession card holders, incapacitated ex-service personnel who meet specific requirements, people with disabilities whose legs are affected and are unable to use public transport, and primary producers in agricultural fields
<b>Public transport fares</b>	Free travel- children under five, and Companion Card, Mobility Pass and Visual Impairment Pass cardholders Free travel off peak- Seniors cardholders, available to Australian residents aged 60 and over who work 20 hours or less per week Discounted travel- Full time students (excluding distance education), and some Centrelink recipients

Motor vehicle registration, driver's licence fees and public transport fares are all flat fees - where costs are the same for all groups (except vehicle registrations which differ depending on vehicle characteristics). These flat fees are themselves poverty premiums because they impact disproportionately on people living on low incomes as they take up more of their household budget. Concessions can alleviate this impact by introducing a tiered fee system for eligible low-income groups, but if poorly designed the concessions may introduce new poverty premiums when discounts are granted to those on higher incomes and not lower income counterparts.

The following section outlines the poverty premiums that occur in concessions for both private motoring and public transport.

### Licence and registration

The most obvious example of a poverty premium in transport concessions are motor vehicle and licence concessions. At least 50% discounts are offered to age pensioners, primary producers, and some people with disabilities, in addition to an exemption from stamp duty on compulsory third party insurance (Government of South Australia, 2021). These concessions, although welcome, are not extended to others who live on lower incomes – particularly other Centrelink recipients such as those on JobSeeker, Parenting Payment or Youth Allowance who receive lower payments than age pensioners.

**SACOSS recommends extending all concessions available to age pension recipients to other Centrelink recipients receiving lower payments, and the implementation of an additional low-income eligibility criteria all concessions which is not based on receipt of Centrelink benefits.**

Extending licence and registration concessions to other low-income groups would bring these concessions more in line with public transport concessions, although reform is also needed in this area.

## Public transport

Australia is a notoriously car centric society, but public transport plays a vital role for both mass transportation of work commuters and those who cannot afford private transport.

The SA government provides a range of public transport concessions. Free public transport travel is offered to several groups based on mobility concerns or to accompany another passenger, i.e. children under five and Companion cardholders. Seniors cardholders are entitled to free off-peak travel, significantly enabling their mobility during these times - 9.01 am-3pm on weekdays, and all day on weekends and public holidays. Seniors receive a 50% discount on public transport fares at all other times, alongside two other main groups – students and Centrelink recipients.

This eligibility criteria creates poverty premiums as those on the lowest Centrelink incomes and other very low incomes pay more for public transport in some circumstances (e.g. during off-peak travel times). The Anti-Poverty Network SA has argued that free off-peak travel should be extended to include peak times and that these entitlements should also apply to low-income passengers (Anti-Poverty Network, 2018).

SACOSS echoes the Anti-Poverty Network's recommendation and similarly **recommends extending all concessions available to age pension recipients to other Centrelink recipients receiving lower payments, and the implementation of an additional low-income eligibility criteria all concessions which is not based on receipt of Centrelink benefits.**

SACOSS has also elsewhere called for **free public transport for all South Australian children and young people until the end of their secondary education** (SACOSS, 2021). These recommendations would support mobility and participation for more people living on low incomes and rectify the existing poverty premium where age pensioners on higher incomes pay less for public transport.

## Ambulance cover

Ambulance attendance and transport is obviously an essential service, but South Australia lags behind other jurisdictions in the ambulance subsidies it provides. Ambulance transport is free in Queensland and Tasmania and free or discounted in all other jurisdictions, except the Northern Territory. In comparison, South Australian ambulance services are based on a user-pays cost-recovery system, making them prohibitively expensive for people without ambulance cover.

The SA Ambulance Service (SAAS) has a statutory requirement to charge a fee for ambulance service provision, under the *South Australian Health Care Act 2008*. The current SAAS incident response priorities and call-out fees for ambulance services are set out in the table below (South Australian Ambulance Service, 2021).

**Table 7: SA Ambulance Services incident response priorities and call-out fees**

Incident Response Priorities	Current Call Out	Current Cost / per KM
Provision of Retrieval Team	\$3704.00	N/A
Emergency (road transport)	\$1064.00	\$6.00
Non-Emergency (road transport)	\$237.00	\$6.00
Treat no Transport (Treat at scene, no transport required)	\$237.00	N/A

These flat rate SAAS call out costs contain a poverty premium as they have a regressive and prohibitive impact on low-income households. For instance, the cost of an emergency call out is 60% more than the entire fortnightly income for a single person on JobSeeker. High costs for calling out an ambulance may deter financially disadvantaged people from accessing potentially lifesaving health care. Avoiding calling an ambulance due to the cost, when in fact one is needed, has obvious health implications for both the person involved, and for the state if the patient then requires more acute medical services. This flow on effect can create longer-term burdens on the health system.

SAAS will invoice and recover the cost of ambulance services relating to the treatment and/or transport of a person, except in instances where:

- The service is for the initial attendance at a motor vehicle accident,
- Payment for the invoice is the responsibility of another party and such party has acknowledged responsibility for payment of the invoice,
- *The person holds a valid and current Ambulance Cover membership.*

Ambulance Cover membership is basically an insurance system against ambulance costs. Discounts on this membership (which are not specifically listed on the South Australian government concessions website) are important for maintaining access to healthcare for eligible groups. However, the current ambulance cover rates listed on the SAAS website (reproduced in Table 8 below) provide a significant concession for age pensioners but create a poverty premium where those on the lowest incomes, such as JobSeeker, Parenting Payment and Youth Allowance recipients are not entitled to the concession and therefore pay more than pensioners who are receiving higher incomes (SA Ambulance Service, 2021).

For instance, single JobSeeker recipients with no children would pay \$35.50 **more** than an age pensioner for Ambulance Cover.

**Table 8: Ambulance Cover membership fees**

<b>Membership type</b>	<b>Standard Cover (Annual)</b>	<b>Standard plus interstate (Annual)</b>
<b>Family</b>	\$179.00	\$211.50
<b>Single</b>	\$90.00	\$106.40
<b>Pensioner Family</b>	\$108.00	\$140.50
<b>Pensioner Single</b>	\$54.50	\$70.90

To remove this poverty premium, and in keeping with SACOSS' generic recommendations in this report, **we recommend extending all concessions available to age pension recipients to other Centrelink recipients receiving lower payments, and the implementation of an additional low-income eligibility criteria all concessions which is not based on receipt of Centrelink benefits.**



## Cost of Living concession

The Cost of Living concession replaced the council rate concession in 2015 “to help those on low or fixed incomes with *all of their cost of living expenses*, e.g. council rates, energy and medical bills” (Government of South Australia, 2021)(emphasis added). The concession helps a significant number of South Australians – 201,000 in 2020-21 (Government of South Australia, 2021). However, the concession’s origins as council rate relief continue to be reflected in the difference between payments for homeowners and renters where homeowners receive higher payments than renters (except self-funded retirees, who receive a lower payment than other homeowners), as detailed in the table below.

**Table 9: Eligibility and payment rates, Cost of Living concession**

Eligibility	Benefits
<p>Hold a Pensioner Concession, Department of Veteran Affairs’ Gold, Low Income Health Care or Commonwealth Seniors card <b>or</b> Centrelink payment <b>or</b> Meet low-income thresholds.</p> <ul style="list-style-type: none"> <li>• Single people- \$17,412.20</li> <li>• Single parent families- \$18,616</li> <li>• Partnered people- \$31,969.60</li> </ul> <p><b>And</b> not living with anyone who earns above the low-income threshold, unless they are a spouse, partner or dependent or are receiving a Centrelink or Department of Veterans’ Affairs Payment.</p>	<p>An annual payment meant to assist with living costs for low-income households:</p> <ul style="list-style-type: none"> <li>• Homeowner-occupiers- \$215.10</li> <li>• Homeowner-occupiers who are self-funded retirees with a Commonwealth Seniors Health Card- \$107.60</li> <li>• Tenants- \$107.60</li> </ul>

Tenants of rental properties who live on low incomes receive less than half the concession amount that home owner-occupiers receive, except for retirees (see Table 9). The different payment amounts infer 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. As a proportion of income, renters spend more than the average household on current housing costs, about the same on energy and food, and slightly less on health and transport due to different demographic profiles (ABS, 2017). In relation to taxes like council rates, there is also a difference between the legal incidence of taxes which are levied on owners, and the economic costs which may be borne by tenants. The latter cost occurs as landlords typically incorporate a significant proportion of any extra costs they may bear, such as council rates, into rent amounts to receive a return on their investment. The exact amount incorporated into rent payments will depend on a variety of market factors. However, the current competitive rental market where renters have fewer choices is indicative of an environment where the majority of costs borne by landlords will be passed on to tenants (Premium Property, 2021).

The issue of poverty premiums in these different concession rates is complicated by the fact that some renters in receipt of the Cost of Living Concession would also be eligible for up to \$70.40 per week (for a single person) in Commonwealth Rent Assistance (CRA). This would

raise their overall income to above that of homeowners in receipt of the same social security payment. This income differential could justify the difference in the Cost of Living Concession, especially where homeowners may be paying off mortgages and have high housing and living costs. However, around 85% of homeowners who are on social security are homeowners without mortgages (ABS, 2019). Accordingly, the after-housing income of most homeowners on social security payments is likely to be higher than that of renters on similar payments, even when CRA is taken into account. In this context, there is no justification for the lower concession rates for renters.

The poverty premiums created by the Cost of Living concession amounts can be rectified by **increasing the renter payment rate to the homeowner level**. This change would provide greater support to renters, in a time when and renters have less control over costs associated with their home, such as utility mix or efficiency, and housing is becoming increasingly hard to come by.

Additionally, SACOSS recommend **lifting the rates for the low-income provision for eligibility so that they are in line with the threshold for the Low Income Health Care card** (see Table 10). The Cost of Living Concessions is one of the few existing SA government concessions with a generic low-income provision not tied to Centrelink payments, but the current low-income thresholds are extremely low and are set below the income rates for some other groups who are eligible for concession assistance, i.e age pensioners, as shown in the table below.

**Table 10: Income caps, Low Income Health Care card and Cost of Living concession**

Status	Weekly income threshold, Low Income Health Care Card	Weekly income threshold, Cost of Living low-income provisions
Single, no children	\$636.00	\$385.40
Single with children	\$1,094.00	\$408.75
Couples	\$1,094-1,128	\$640.40

Utilising the Low Income Health Care Card thresholds, is in line with the third over-arching recommendation of this report and would improve consistency within the concessions system.

## Energy bill concession

Energy bills are a significant cost for many households and the South Australian Government pays a flat subsidy, up to \$233.60, to assist with energy costs. Recipients of some social security payments or concession cardholders are eligible to receive the subsidy (see below table). The concession is also extended to residents of residential parks who are billed by park operators.

**Table 11: Eligibility and payment rate, Energy Bill concession**

Eligibility	Benefits
<p>Hold a Pensioner, DVA Gold, Low Income Health Care, or Commonwealth Seniors Health concession card <b>or</b></p> <p>Receive an eligible Centrelink payment (JobSeeker Payment, Widow Allowance, Youth Allowance, Partner Allowance, Parenting Payment, Special Benefit, Community Development Project (CDP), New Enterprise Incentive Scheme (NEIS), ABSTUDY, Austudy, Farm Household Allowance (FHA), War widow pension under legislation of the United Kingdom or New Zealand) <b>or</b></p> <p>Are an asylum seeker receiving Status Resolution Support Service assistance</p> <p><b>And</b> not living with anyone who has an income of more than \$3,000 per year, unless they are a Centrelink or DVA payment recipient <b>or</b> are your spouse, partner or dependent</p>	<p>Up to \$233.60 towards energy costs</p>

This eligibility is based on income and does not take account of very different energy costs arising from usage or technology differences between households. All eligible households receive the same flat rate subsidy. This means that a large family with high usage and dual energy costs, i.e. electricity and gas, could receive the same subsidy to offset their energy costs as a single person with a solar system.

For low consumption households (whether electricity only, electricity/gas, and grid/solar electricity), the energy concession represents a relatively higher value compared to higher consumption households in South Australia. The issues are particularly stark in relation to households with solar power. Initial findings as part of research to be released later in 2021, found that on average, concession recipients with solar receive an effective concession of 62% of their annual bill, compared to around 15% for concession recipients without solar (Mauseth Johnson & Lebaste, 2021) (see below table).

**Table 12: Impact of Energy Bill concessions**

	Pensioner	Healthcare Card	Other*	Average solar
<b>Annual bill without concessions</b>	\$1,549.86	\$1,701.09	\$1,517.13	\$374.32
<b>Annual bill with concessions</b>	\$1,318.45	\$1,469.68	\$1,285.72	\$142.91
<b>Relative value of concession</b>	14.9%	13.6%	15.3%	61.8%

\*The other category includes Department of Veteran Affairs, Immigration Card holders, SA Concession and life support customers

Uptake of solar electricity generation has positive social and environment benefits, but can create an uneven playing field for concession distribution, not least because incentives to increase uptake of solar among homeowners widens the divide between low-income households who rent and those who own their homes. Renters typically have less control over fluctuating energy costs and are unable to make improvements to their homes to lower costs (Law, et al., 2019). These people would benefit most from reduced energy costs but face barriers in accessing incentives to install solar. The result is that those with the right housing tenure and money can utilise solar and energy efficiency incentives, reduce their bills but can (generally) still claim the same concession as those stranded with less efficient technology.<sup>1</sup>

The challenges of climate change make providing incentives for solar installation or energy savings reasonable, but this is not the role of the concessions system. Concessions are designed to assist with affordability and should be targeted at need, not at technology preference. In this context, the flat rate concession is poorly targeted and creates a poverty premium. Those who can buy their way out of high energy bills receive a concession which accounts for a significant part of their total energy expenditure (almost two-thirds of the annual electricity bill in the figures above), while other households with presumably lower wealth and greater affordability struggles receive a proportionately smaller concession.

To remove the poverty premium and better target the concession to those with the greatest energy affordability challenges, **SACOSS recommends shifting to a percentage-based concession**. The Victorian state government uses a percentage-based approach for their energy bill concession, paying 17.5% of the energy bill (after retailer discounts and solar credits) for bill amounts over \$171.60 but not more than \$2,973 in a year (Department of Families, Fairness and Housing, 2021). The Australian Competition and Consumer Commission has also recommended a hybrid scheme combining both flat-rate and percentage-based components (ACCC, 2018). SACOSS will release a report later this year modelling these various approaches, but it is clear that the current South Australian flat-rate scheme is flawed and requires change.

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<sup>1</sup> One exception is the Switch for Solar scheme offered by the State Government, where participants forgo their energy bill and cost of living concessions for 10 years in exchange for solar panel installation (Government of South Australia, 2021). This addresses the concession inequality, but does not address the high energy bills of renters who cannot take part in the scheme.

Further, as per our over-arching recommendations, SACOSS recommends **implementing of an additional low-income eligibility criteria for all concessions which is not based on receipt of Centrelink benefits.**

## Barriers to Access

Appropriately targeting concessions eligibility criteria is crucial to ensure that the concessions system continues to enable greater social participation, health and wellbeing for people facing challenging living circumstances. The following section analyses concessions that contain an inherent barrier to access, simply because the eligibility criteria are poorly targeted or includes arbitrary requirements. Similar to the previous section where poverty premiums were discussed, barriers to access often adversely affect those most in need of support.

These eligibility barriers occur through a range of assumptions - that people living on low incomes receive Centrelink support and are the population most in need of concession support and that those in shared housing financially support each other. There are also often barriers arising from requirements for additional external proof before support is granted. These theoretical leaps and additional hurdles leave behind many who cannot access Centrelink support or who do not know about additional application requirements.

## Health Care cards

South Australians are eligible for Cost of Living, Emergency Services Levy, Energy bill, Medical Heating and Cooling, and Water and Sewerage Rate concessions if they are receiving one of a list of Centrelink payments, or hold a Pensioner Concession, DVA Gold, Low Income Health Care, or Commonwealth Seniors Health Care card.

Significantly, the current eligibility criteria does not include parents living on low incomes who hold a Health Care card which is distributed automatically to recipients of the maximum Family Tax Benefit Part A. Parents who receive the maximum rate of Family Tax Benefit A are subject to a similar income test to Low Income Health Care card recipients (see Table 13) (Services Australia, 2020). Despite similar income requirements, the Health Care is not considered an adequate form of proof for most South Australian concessions. Family Tax Benefit A recipients then have to apply separately for the Low Income Health Care card to become eligible for concession support.

**Table 13: Income caps, Low Income Health Care card and Family Tax Benefit A**

Status	Annual income cap, Low Income Health Care Card	Annual income cap, maximum rate of Family Tax Benefit Part A
Single, 1 child	\$57,564	\$56,137
Couples, 1 child	\$59,332	\$56,137
Additional children	\$1,768	-

The extra application process in applying for the Low Income Health Care card when they already have a different Health Care card creates an extra administrative hurdle and can be a barrier to accessing concessions that may be vital for ensuring access to essential utilities. The similar low-income requirements for Family Tax Benefit Part A Health Care card makes applying for an additional health care card arbitrary and unnecessarily onerous. **SACOSS recommends that both the Health Care card and Low Income Health Care card should be recognised as valid forms of eligibility, allowing cardholders to present their existing card as proof of their income status.**

## House sharing and Energy Bill and Cost of Living concessions

In 2018 there were around 18,000 “non-family households” in South Australia, representing about 2.6% of all households (ABS, 2019). Many of these households are likely to contain people on low incomes - stereotypically, but not only, students. The eligibility criteria for the Energy Bill and Cost of Living concessions do not handle such households fairly or well, as they specify an income limit for the recipient *and anyone they may be sharing a house with*. People who would otherwise qualify for an energy concession are excluded if anyone they share a house with earns over \$3,000 per annum. The Cost of Living Concession excludes people where anyone in the household earns more than \$18,000 per year. These income thresholds represent a barrier to accessing support for people who may be living on very low incomes, simply because of their housing arrangements.

The \$3,000 energy concession threshold excludes those sharing with virtually anyone with an income, while the \$18,000 threshold limits concessions to where share-householders are on youth, study or JobSeeker payments, or have very limited employment. Those sharing houses outside of this limited scope are effectively excluded from the concession payments, yet people on very low incomes may share houses with people beyond these income levels, but still pay an equal share of households bills, without access to a share of their housemates’ higher incomes.

The exclusion of many house-sharing residents relies on assumptions about the nature of share houses and the relationship between these residents which simply may not be true. House sharing is often an effective way of reducing housing and other living costs, such as utilities, but this may be little more than a commercial agreement and does not necessarily imply income sharing or financial reciprocity. The *a priori* assumption that people in shared housing support each other financially risks inadvertently increasing these residents’ vulnerability by lowering their overall access to support.

**SACOSS proposes two changes to remove the barriers to accessing concessions for low-income share-householders:**

- **Amend the shared-householder income limit for the Energy Bill concession should be increased to, at least, the \$18,000 limit set for the Cost of Living concession, but preferably to the Low Income Health Care card thresholds;**
- **Introduce a partial concession for individuals living on low incomes who share a house with people unrelated to them earning over \$18,000 (capped, if needed at the average wage), with the amount of the concession based on the number of household members.**

The first proposal is a straight-forward change that could be instituted swiftly. The second would mean that someone who would otherwise qualify for a concession but was sharing with one other person (earning more than \$18,000) would be entitled to one-half of the applicable energy or cost of living concession. Similarly, an otherwise eligible person sharing with two unrelated people (either of who earned more than \$18,000) would be entitled to one-third of the applicable concession – and so on. This system would avoid the assumption of shared income or financial reciprocity and provide support to those on very low incomes, while taking into account that living costs are reduced when sharing a house.



## Asylum seekers

Asylum seekers are people seeking protection as refugees whose claim is waiting assessment (Refugee Council of Australia, 2019). People seeking asylum in Australia often wait years for their application to be processed and receive limited government support, depending on their visa category and conditions, and report extreme difficulty accessing employment, housing and education due to their precarious residency status and limited working rights. Asylum seekers should be able to receive the support offered to others in our community who live on very low incomes, but current concession eligibility criteria mean that many asylum seekers are ineligible for most concessions.

Asylum seekers are excluded from concessions that do not use a generic low-income eligibility criterion or specifically extend concession support to asylum seekers. The majority of state concession schemes require receipt of Commonwealth social security payments as a basis of eligibility. Asylum seekers are not eligible for Centrelink payments because they contain residency requirements that exclude those seeking asylum until they are granted protection visas, and legally are no longer considered to be seeking asylum (Asylum Seeker Resource Centre, 2020).

Other concessions require the recipient to be a permanent resident, which precludes asylum seekers. Even where state concessions, i.e. Cost of Living and Water and Sewerage concessions, are available based on a generic low-income criteria and are not subject to residency requirements, they may require recent payslips or a tax return as proof of low income. Asylum seekers cannot produce this evidence if they do not receive an income from wages.

Beyond those two concessions, asylum seekers may also access energy and public transport concessions, but only if they have been accepted into the Department of Home Affairs' Status Resolution Support Service (SRSS) program (Government of South Australia, 2021). The recent inclusion of this eligibility criteria is a step in the right direction, or at least an acknowledgement of the need for concessions support for asylum seekers, but unfortunately it only includes a small number of people. Policy changes introduced in June 2018 dramatically restricted eligibility criteria and reduced support available for those in the SRSS program (St Vincent de Paul Society National Council, 2018). In February 2018, prior to these policy changes there were 828 SRSS recipients in South Australia and 13,299 nationally (Home Affairs Portfolio, 2018). As of March 2021, there were just 129 SRSS recipients in South Australia and a total 3159 nationally (Home Affairs Portfolio, 2021). SRSS is not accessible to many other asylum seekers living in the South Australian community who would benefit from concession support.

The table below outlines each South Australian government concession, whether asylum seekers are eligible to receive them, and the barriers that asylum seekers face in accessing each concession.

**Table 14: Eligibility criteria and barriers to access for asylum seekers by concession**

Concession	Eligibility criteria	Potential Eligibility?	Barrier
<b>Cost of Living</b>	Low-income provisions	Yes	Requires payslips or tax return as proof of income
<b>Energy Bill</b>	Status Resolution Support Service	Yes	Only small numbers of asylum seekers are eligible for SRSS
<b>Water and sewerage</b>	Low-income provisions	Yes	Requires payslips or tax return as proof of income
<b>Public transport</b>	Status Resolution Support Service	Yes	Only small numbers of asylum seekers are eligible for SRSS
<b>Motor vehicle licence and registration</b>	Age pension or DVA cardholders and primary producers	No	Centrelink payments contain residency requirements
<b>Ambulance cover</b>	Age pension	No	Residency requirements/ineligible for Centrelink payments
<b>Emergency Services Levy</b>	Receiving Centrelink payment and some cardholders	No	Residency requirements/ineligible for Centrelink payments
<b>Switch for Solar</b>	Centrelink payment requirements	No	Residency requirements/ineligible for Centrelink payments
<b>Residential parks</b>	Centrelink payment requirements	No	Residency requirements/ineligible for Centrelink payments
<b>Funeral Assistance SA</b>	Low-income provisions	Yes	No barriers unless unable to source identification to open bank account
<b>Glasses SA</b>	Centrelink payment requirements	No	Residency requirements/ineligible for Centrelink payments
<b>Medical heating and cooling</b>	Centrelink payment requirements	No	Residency requirements/ineligible for Centrelink payments
<b>Personal alert systems</b>	Residency, Centrelink reciprocity, and My Aged Care assessment	No	Permanent residency requirements, excludes asylum seekers

SACOSS proposes that **an additional eligibility criteria which is purpose-built for asylum seekers is added to all concessions to enable asylum seekers on low incomes to qualify for those concessions.**

The eligibility criteria could be built around registration on the Department of Home Affairs' Visa Entitlement Verification Online (VEVO) system which state government departments can access to verify the immigration and visa status of asylum seeker applicants. Other jurisdictions<sup>2</sup> use a similar process where asylum seekers present a current ImmiCard, issued

<sup>2</sup> See, for example, Queensland Government [electricity and gas rebates](#) and [public transport discounts](#).

by the Department of Home Affairs, to verify visa status. However, ImmiCards do not reflect when visas have been extended and are not issued to all asylum seekers - those who arrive by plane and people in community detention (Refugee Council of Australia, 2020). Accordingly, VEVO registration is a much more reliable way to check immigration status.

VEVO registration itself does not record income levels, so asylum seeker applicants would need to prove their low-income status separately. A mechanism to assess income levels could not rely on Centrelink reciprocity or payslips, given that asylum seekers cannot access Centrelink payments and often do not have working rights. Instead, applicants could prove their low-income status by providing 8 weeks of bank statements and any other evidence required for other eligibility criteria, and sign a statutory declaration. This application process is similar to existing requirements for some concessions, i.e. Funeral Assistance SA, and in keeping with our over-arching recommendation the low-income threshold should be aligned to the Low Income Health Care Card thresholds.

Introducing an additional eligibility criteria for concessions based on VEVO registration combined with a generic low-income provision is administratively possible and would be an important extension of support to asylum seekers who are struggling financially.

## Transport Concession card

This report has already identified poverty premiums in public transport concessions, but there are also barriers to *utilising* available concessions. Full time tertiary students, not including those studying via correspondence, and pensioners receive cards issued by the State Government and can use these to receive concession travel rates. However, Centrelink recipients who are eligible for concession public transport rates are required to apply for a separate Transport Concession card to access concession fares. When Centrelink recipients are not carrying a Transport Concession card while using public transport but have another form of identification, they risk being fined up to \$220 by Transit Police - 70% of the weekly income received by JobSeeker recipients (Commissioner for Children and Young People SA, 2019; Services Australia, 2021).

Centrelink recipients wanting to access concession public transport pricing must apply for a separate Travel Concession Card to allow information held by the Federal Department of Social Services to share up-to-date eligibility proof with the State Department for Human Services. However, all other states and territories accept Health Care cards, issued to most Centrelink recipients and available to others living on very low incomes, as proof of concession eligibility, making South Australia unique in requiring this additional identification.

The requirement to apply for a second transport-specific concession card, when a Health Care card is ordinarily an adequate form of proof, has reportedly caused significant confusion and is a potential factor in the high rate of fines received by people using incorrect concession identification (Commissioner for Children and Young People SA, 2019; Richards, 2018). The Commissioner for Children and Young People found that the second most common expiation notice issued is to people travelling on concession fares without the requisite Transport Concession card (Commissioner for Children and Young People SA, 2019). It is likely that in some of these instances, users were unaware that they needed to apply for a separate concession card.

SACOSS calls for **a range of adult concession cards, e.g. Family Tax Benefit Health Care Card and Low Income Health Care Card, to be recognised as proof of eligibility to travel with a concession ticket.** This would remove the need to apply for and carry a separate Transport Concession card. Further, **there should be an ability to waive concession-related transport fines after-issue** if a person can show that they were eligible for a concession but were not in possession of proof of eligibility at the time they were issued with a fine.

## Conclusion

Concessions are important for enabling social participation and supporting wellbeing. It is vital that such concessions are delivered in a robust, consistent manner targeted to those most in need. In recognition of this, over the last few years the South Australian government, and the Department of Human Services in particular, have made a range of changes to the administration of concessions to improve the management, and speed and ease of access to many concessions. These changes are welcome and no doubt will have helped some concession recipients. However, while there continues to be people who need concessions and cannot get them, fundamental issues of system design remain.

The system remains a product its history as reforms and initiatives have been added over time creating a patchwork concession 'system' marked by gaps, poverty premiums, arbitrary requirements and barriers to access. As a system and as a holistic response to poverty, it is inconsistent, poorly targeted and at least partially broken. The issues raised in this report highlight areas where eligibility criteria and application processes are unfairly burdening or leaving behind people in need of concession support.

This report has outlined a series of problems with the logic and assumptions, or the eligibility and availability of concessions provided by the South Australian government. In response to these problems within the concession system, SACOSS has developed **three over-arching recommendations** for system reform and **a series of smaller recommendations** aimed at more immediate action to remove inherent poverty premiums and barriers to access.

Firstly, while this report has canvassed a range of issues with the concessions system, particularly focusing on poverty premiums and barriers to access, SACOSS of course has limited resources and does not have access to a range of government data on concessions. Accordingly, the issues highlighted here may not be the only ones that need to be addressed and so SACOSS recommends that **the state government initiate a broad review of the concession system as a whole to ensure that concessions are logically targeted to those most in need and do not put up barriers to access.**

Secondly, as argued in the body of the report in relation to poverty premiums, we recommend **extending all concessions available to age pension recipients to other Centrelink recipients receiving lower payments.**

Third, we are calling for **implementation of an additional low-income eligibility criteria for all concessions which is not based on receipt of Centrelink benefits.**

Finally, beyond those three systemic-level reforms, the report has made a series of smaller targeted recommendations for reforms of specific recommendations. These have been highlighted in bold throughout the text and are summarised in the front of the report.

Taken together, these reforms, if enacted, would improve the targeting, rationality and impact of the South Australian concessions and provide greater assistance to those most in need in our community.

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