

42. J Willis

Full name: Judith S. Willis

Question 1:

**Q.1 The ALRC has identified as framing principles: participation; independence; self-agency; system stability; system coherence; and fairness. Are there other key principles that should inform the ALRC's deliberations?**

a..Framing principles need to include 'equity' and 'gender equality'.

b.. Framing principles also need to include 'adequacy and security of income'. Lack of adequate or secure income can prevent the inclusion of older persons in training, or 'other productive work'.

c.. Why has the ALRC decided to exclude the 'informal care' - unpaid care provided by family members' from discussion in this Inquiry? Informal care is affected by lack of accommodation in several areas of Commonwealth Law such as lack of employment rights (for example, sick leave, annual leave, superannuation and above all, income). It seems irrational to ignore an economic contribution of \$40 billion annually in a discussion of 'other productive work'. Since informal care is carried out disproportionately by women (Issues Paper para 15), this decision is very discriminatory, particularly in regard to women's participation in Australian society. It is contrary to the Australian Government's 'Social Inclusion Agenda' - a 'vision of a socially inclusive society [that] is one in which all Australians feel valued and have the opportunity to participate fully in the life of our society' (Issues Paper para 26). As the Issues Paper points out in para 28, 'opportunity' includes 'Work by participating in employment, in voluntary work and in family and caring'. This decision appears to be contrary to the Terms of Reference of this Inquiry.

Question 2:

**Q. 2. As there is a five year difference in qualifying age for a Service Pension under the *Veterans' Entitlement Act 1986 (Cth)*, should it be increased incrementally in the same manner as for the Age Pension?**

No. The premise that armed service may lead to premature ageing and earlier susceptibility to diseases which affect the aged, seems plausible. What research evidence is available on this issue? Have veterans been surveyed for their opinions and needs regarding this and other matters?.

Question 3:

**Q.3. In what ways, if any, should the means test for the Age Pension be changed to remove barriers to mature age participation in the workforce or other productive work?**

The means test for the age pension creates barriers to mature age participation in the workforce and other productive work. This is particularly so in the case of women, where incomes may be lower than in the case of men and reliance upon the Age Pension may be greater. One of the main inhibiting factors to workforce participation is the fact that the welfare system is so complicated that one is reluctant to upset the status quo in case one's financial situation is inadvertently made worse. Particularly in a period of economic recession, an Age Pension may be a more secure basis of income than intermittent casual or regular part-time employment.

Although one is required to check one's gross income and assets regularly, Centrelink will not provide a written record of how a part pension is calculated - which makes it very difficult to assess the effect of any changes in income. This is exacerbated when the 'taper rate' is changed. It also seems ridiculous, and costly from the government's point of view, that one actually has to apply for an age pension, and then regularly prove that one is entitled to it. On a cost/benefit basis it would be cheaper and more efficient administratively, if an adequate income were provided by means of the social and economic policy known as Basic Income (BI) or Universal Basic Income. This payment, which is made to all citizens, from birth to death, irrespective of means test, employment or age, would also remove the concern expressed in the Issues Paper para 46 about 'differential treatment between those who are over 45 and those who are not'. Further detail about this policy is given in response to Q6 (and 30).

Question 4:

**Q.4. In what ways, if any, should the *Pension Bonus Scheme* be changed to remove barriers to mature age participation in the workforce?**

Paragraph 48 of the Issues Paper states: 'The Pension Bonus Scheme was designed to act as an incentive for Age Pensioners to undertake or continue some level of workforce participation where they are able to do so.' Paragraph 50 continues: 'Registration in the Pension Bonus Schemes is closed to new entrants other than those who qualified for Age Pension before 20 September 2009, and registration for the scheme must have occurred within 13 weeks of first qualifying for the Age Pension.'

It is pertinent to ask how many pension beneficiaries are registered for the Pension Bonus Scheme? Also, how many beneficiaries did *not* manage to register, even though they were eligible? I would be inclined to leave it as it is, just to save further change and anomaly in regard to the overly complex system of rules and regulations for Commonwealth pensions and allowances.

Question 5:

**Q. 5. How effective has the *Work Bonus* been in removing barriers to work for mature age persons? In what ways, if any, could it be improved?**

Issues Paper, para 51, states: 'Work Bonus was introduced in 2009 to reduce the amount of assessable employment income in an instalment period. Work Bonus was expanded on 1 July 2011 to allow Age Pensioners, especially those with seasonal or intermittent jobs, to keep more of their Age Pension if they choose to work. A person can earn up to \$250 a fortnight, without it being assessed as income under the pension income test.'

Paragraph 52 continues 'Any unused amount of the fortnightly \$250 Work Bonus accumulates in an 'Employment Income Concession Bank', up to a maximum amount of \$6,500. Credit in the income bank can then be carried forward and be used to offset employment income that would otherwise be assessable under the pension income test. Work Bonus is not available to a person who is self-employed.'

These administrative arrangements are difficult to understand. It is also difficult to understand why the 'Work Bonus is not available to a person who is self-employed. One would need to undertake a probability sample survey of persons entitled to the Work Bonus to obtain good evidence about how effective the Work Bonus has been in removing barriers to work for persons aged 45 years and over.

Question 6:

**Q. 6. In what ways, if any, can the complexity of the tax-transfer system be minimised to remove barriers to mature age participation in the workforce?**

The most effective way to minimise the complexity of the tax-transfer system - and so remove barriers to mature age participation in the workforce- would be to introduce a progressive social policy termed Basic Income (BI).

This policy has the potential to solve the fiscal challenges of Australia, UK, US, Canada, and other developed nations where costs of pensions, health and support services will be rising during the next forty years due to increasing numbers of older people, but tax receipts to pay for those costs will be declining due to a proportionally smaller workforce.

The policy of Basic Income is debated in Europe, the United States and elsewhere, but to date there has been little awareness of it in Australia. It would be helpful if the Australian Government were to organise forums in which there could be discussion and evaluation of different models of Basic Income which may be applicable to Australia.

Basic Income is a grant of income to all citizens from birth to death, irrespective of a means test, age or employment. It may be paid annually, as in Alaska, or monthly as in a pilot study in Namibia. It could be argued that to some extent the Australian tax-transfer system has been moving incrementally towards this goal for the past two decades (eg with family payments and paid parental leave).

This policy would redress the relative poverty of women and children. It would remove the need for concerns about age limits regarding life insurance or income protection insurance, or an age limit acting as an incentive to leave the paid workforce. It would provide income security during periods of personal and labour market change. There would be no qualifying periods, eligibility requirements, medical tests or time-consuming administration. Since 1982 Alaska has paid a partial BI or dividend each year to each man, woman and child from a sovereign wealth fund in recognition of their share in the ownership of Alaska's oil reserves (see Karl Widerquist and Michael Howard. eds. *Exporting the Alaska Model - Adapting the Permanent Fund Dividend for Reform around the World*. Palgrave Macmillan forthcoming 2012).

Several models of a Basic Income have been suggested internationally. The links below provide some information.

- a) Basic Income Earth Network (BIEN) <http://www.basicincome.org/bien/aboutbien.html#ec>
- b) Basic Income Guarantee, Australia (BIGA) <http://www.basicincome.qut.edu.au/>
- c) Basic Income Studies journal <http://www.degruyter.com/view/j/bis>
- d) publications by Palgrave-Macmillan <http://binews.org/2012/03/publications-palgrave-macmillan-releases-first-two-books-in-its-series-%E2%80%9Cexploring-the-basic-income-guarantee%E2%80%9D/>
- e) Guy Standing <http://www.guystanding.com/>
- f) a model of BI based upon unpaid volunteer work or 'mutual obligation' for all adults, to create sustainability regarding costs:  
  
[http://public-policy.unimelb.edu.au/\\_data/assets/pdf\\_file/0011/509582/Win3.pdf](http://public-policy.unimelb.edu.au/_data/assets/pdf_file/0011/509582/Win3.pdf)
- g) Also Google 'Basic Income' and 'Universal Basic Income'.

This would be a major change in Australia's Taxation and Social Security Law, but one, I suggest, that would support the well-being of all citizens, in addition to addressing the fiscal challenge of an ageing population.

Question 7:

**Q. 7. In what ways, if any, do the tax exemptions for social security payments affect mature age participation in the workforce?**

I agree with the Tax Review that, to improve simplicity, all pensions should be tax exempt (see Issues Paper para 60)

Question 8:

**Q. 8. A number of tax offsets are available to encourage mature age participation in the workforce including the Senior Australians Tax Offset, Pensioner Tax Offset, Low Income Tax Offset and the Mature Age Worker Tax Offset.**

- a. **In what ways, if any, might these offsets be improved to encourage participation?**
- b. **The Australia's Future Tax System Review recommended that these tax offsets be removed. What disincentives would this create for mature age participation in the workforce?**

The offsets are so complex that most people probably do not understand which ones may be relevant to their situation, let alone how they may interact with a welfare allowance or pension. Although the benefits are appreciated when it means less tax, I doubt that the offsets themselves are an incentive or disincentive regarding mature age participation in the workforce (once again, a well-designed national survey is required). I agree with the Tax

Review that, to simplify the income tax system, these tax offsets should be removed as separate components of the system and incorporated into the personal income tax scales.

Question 9:

**Q. 9. What other changes, if any, should be made to income tax laws to remove barriers to mature age participation in the workforce and other productive work?**

In order to remove barriers to mature age participation in the workforce, income tax laws need to be simplified.

Saul Eslake (the Grattan Institute) has also argued that negative gearing tax arrangements can act as a disincentive to workforce participation (The Age 30/3/11, BusinessDay p.16). This issue may be pertinent if most people who buy investment properties are aged 45 years and over.

Question 10:

**Q. 10. What changes, if any, should be made to the Superannuation Guarantee scheme, to remove barriers to work for mature age persons?**

The Issues Paper (para 74) points out that women, overall, 'benefit much less from superannuation'.

Women undertake a disproportionate amount of unpaid work than men, and consequently experience more discontinuity in regard to paid employment. The Superannuation Guarantee scheme will not redress this problem. One approach that will redress inequities between women and men in regard to superannuation, in addition to providing adequate retirement income for 'low-income earners' would be a Basic Income (see response to Q.6).

Question 11:

**Q. 11. The Superannuation Industry (Supervision) Regulations 1994 (Cth) prescribe age-based restrictions on voluntary contributions. Members cannot:**

- a. make voluntary contributions from age 65 until age 75 unless they meet a work test; or
- b. make voluntary contributions from age 75.

**What effect do these restrictions have on mature age participation in the workforce? What changes, if any, should be made to these regulations to remove barriers to work for mature age persons?**

The superannuation age-based restrictions add to the complexity of superannuation arrangements. They possibly inhibit mature age participation, if members understand the regulations, which are constantly subject to change.

Question 12:

Question 13:

**Q. 13. In what ways, if any, does the age restriction on government co-contributions in the Superannuation (Government Co-contribution for Low Income Earners) Act 2003 (Cth) create barriers to work for mature age persons? What changes should be made to the Act to remove such barriers?**

Paragraphs 98 - 102 of the Issues Paper 41 *Grey Areas - Age Barriers to Work in Commonwealth Laws*, give some indication of the complexity of this issue. Members may not understand the regulations well enough to view the age restriction (amongst other restrictions) as a barrier.

Question 14:

**Q. 14. What effect, if any, does the increased concessional contributions cap for persons aged 50 years and over have on mature age participation in the workforce?**

A response to this question (and many others) would be best obtained from a national survey based upon a probability sample.

Question 15:

**Q. 15. What effect, if any, does the 'bring forward rule' (in relation to the non-concessional contributions cap) have on mature age participation in the workforce? What changes should be made to this rule to address barriers to such participation?**

Please see my answer to Q 14 above.

Question 16:

**Q. 16. The age settings for access to superannuation benefits are:**

- a. **55 years increasing to 60 years for 'preservation age'—when persons may access superannuation if retired; and**
- b. **65 years for unrestricted access to superannuation.**

**The Australia's Future Tax System Review recommended that the preservation age be raised to 67 years. In what ways, if any, do existing age settings provide incentives for retirement for mature age persons, rather than continued workforce participation? What changes should be made to address these incentives?**

I am very critical of any rises in the preservation age, particularly for women, who have not usually had the benefit of a continuous pattern of paid work..

Raising the preservation age to reduce pension costs is not the only way in which mature age people may be encouraged to participate 'in the workforce or in other productive work (paid and unpaid)'. It is timely to debate and consider the progressive social policy of Basic Income. The model I propose is based on reciprocity for adults by means of unpaid labour. This would make the costs of a Basic Income sustainable. With a secure and adequate basic income, both men and women would have freedom of choice of activity at different times of life. Each person (including children) would receive an equal grant. With the removal of anxiety about security or adequacy of income, and the removal of hours of bureaucratic processes associated with the welfare system or taxation, people would be free to engage in the activity of their choice (including caring and parenting) at each particular point in their life course. Please see my response to Q. 6 for more information.

Question 17:

Question 18:

**Q. 18. In practice, do persons of preservation age have sufficient access to the 'transition to retirement' rules? If not, what measures could improve such access?**

A national survey is required in order to provide information about this subject.

Question 19:

**Q. 19. What changes, if any, should be made to the taxation of superannuation benefits to remove barriers to work for mature age persons?**

I am not familiar with the latest research findings for this issue. Neither is it clear whether this question refers to the contribution stage, earnings stage or benefits stage of Superannuation - or all three (see Issues Paper para 72).

Gong and McNamara (2011, p. 8) suggest that 'Some factors which may possibly influence workforce participation for older workers in Australia include physical and mental health; educational attainment; the possible impact of the tax-transfer and retirement income systems; cultural attitudes; workplace flexibility and access to retraining and support services (DOHA 1999; Treasury Intergenerational Report 2010; Cai and Gong 2009; Leigh 2010).'

I suspect that changes to taxation of superannuation benefits are of less importance than these other factors in regard to removing barriers to employment for mature age persons.

Question 20:

**Q. 20. What other changes, if any, should be made to superannuation laws, including tax laws, to remove barriers to mature age participation in the workforce?**

The ALRC has adopted the age cut-off of 45 years and over to define 'mature-aged persons' in this inquiry. It is inappropriate to view 'mature age persons' as a homogeneous group. Amongst persons aged 45 years and over, there is a great diversity of education, skill, life and employment experience, disability and ill-health, wealth and unpaid support at home. Patterns of employment and 'other productive work ... paid or unpaid' (see Inquiry Terms of Reference), may differ between women and men. Some are retired from paid work, some are not. Some have not actively looked for a job, are available, but would prefer to be employed. Some are sole parents who are denied the choice of caring for their children in order to receive social security assistance.

These differences need to be taken into account. Moreover, personal and employment changes can occur in a person's life or within a family or household in an instant. A social policy such as Basic Income, which provides adequate and secure income for each child, woman and man will provide a secure environment in which each person can give priority to the utilisation of their talents at a particular time of life.

A Basic Income would mean there would be no need for Workers Compensation, Transport Accident Compensation, child-support arrangements, insurance protection, life assurance (dependents will have access to income in their own right). It solves problems associated with tax laws, age limits, effective marginal tax rates, lack of employee entitlements when firms go bankrupt, non-payment of child support, domestic violence (adults and children have the financial independence to leave). It provides a secure and adequate income to each child, woman and man during personal transitions (such as pregnancy, birth, accident) and labour market transitions such as those from employment to unemployment or retirement.

If such a policy were developed on the principle of 'mutual obligation' for all adults, not just those 45 years and older, many services required for an ageing population would be available on a free (volunteer) basis as far as costs were concerned. This is more likely to solve the fiscal challenge (due to increased pension, health and service costs, but lower taxation receipts due to an ageing population) that is forecast for Australia and other developed, post-industrial economies during the next 40 years, than changes to superannuation or tax laws.

Question 21:

**Q. 21. A number of social security payments and entitlements may affect mature age persons' participation in the workforce or other productive work. In practice, how accessible to mature age persons is information about eligibility for such social security payments and entitlements?**

A national survey is required for a response to this question

Question 22:

**Q. 22 Several tools and processes are in place to determine a person's capacity to work and to recommend the content of a person's activity test or participation requirements. In what ways, if any, should these tools and processes be changed to assist mature age participation in the workforce?**

I would like to see the tools and processes abandoned and workshops and conferences organised in order to explore different models of a Basic Income that would provide security of income for children as well as men and women, without the stigma, lack of dignity and poverty involved with many of the current processes related to Social Security law. On a cost-benefit basis, a social policy of Basic Income would be cheaper than maintaining the anomalies and maladministration of Australia's current welfare system.

Question 23:

Question 24:

Question 25:

Question 26:

Question 27:

Question 28:

Question 29:

**Q. 29. In what ways, if any, should the eligibility requirements for Austudy, ABSTUDY and Pensioner Education Supplement be changed to address barriers to mature age participation in the workforce or other productive work?**



The taper rates should be discarded, in order to encourage education and in recognition that we need a skilled 'knowledge' society.

Similarly, Social Security law (ie Centrelink) should not penalise a part or full-time student who wins an educational scholarship with the 50% taper rate and treat it as 'earnings'. There are high costs involved with study, and this Commonwealth regulation detracts from the practical value of the scholarship. It becomes a disincentive to apply.

In regard to education, there is also a need for it to be made unlawful to discriminate against part-time students eg by advertising reduced conference registration rates for full-time students only (not part-time students). Persons who study part-time usually do so for reasons of family responsibilities or ill-health or disability. Austudy also needs to be available for part-time study - otherwise it is discriminating against people who may be limited in time by caring responsibilities, household duties or their own ill-health or disability. These matters may affect mature age women more than men.

There may be other areas where discrimination against part-timers creates barriers to persons aged 45 years or over from participating or continuing to actively participate in productive work (paid or unpaid) or in the workforce, The laws to protect part-timers from discrimination need to apply to all age groups - not just those who are 45 years and older.

Question 30:

**Q. 30. What other changes, if any, should be made to social security laws and the *Guide to Social Security Law* to remove barriers to mature age participation in the workforce and other productive work?**

My response to Q. 6 is relevant and is repeated here.

The most effective way to minimise the complexity of the tax-transfer system - and so remove barriers to mature age participation in the workforce - would be to introduce a progressive social policy termed Basic Income (BI).

This policy has the potential to solve the fiscal challenges of Australia, UK, US, Canada, and other developed nations where costs of pensions, health and support services will be rising during the next forty years due to increasing numbers of older people, but tax receipts to pay for those costs will be declining due to a proportionally smaller workforce.

The policy of Basic Income is debated in Europe, the United States and elsewhere, but to date there has been little awareness of it in Australia. It would be helpful if the Australian Government were to organise forums in which there could be discussion and evaluation of different models of Basic Income which may be applicable to Australia.

Basic Income is a grant of income to all citizens from birth to death, irrespective of a means test, age or employment. It may be paid annually, as in Alaska, or monthly as in a pilot study in Namibia. It could be argued that to some extent the Australian tax-transfer system has been

moving incrementally towards this goal for the past two decades (eg with family payments and paid parental leave).

This policy would redress the relative poverty of women and children. It would remove the need for concerns about age limits regarding life insurance or income protection insurance, or an age limit acting as an incentive to leave the paid workforce. It would provide income security during periods of personal and labour market change. There would be no qualifying periods, eligibility requirements, medical tests or time-consuming administration. Since 1982 Alaska has paid a partial BI or dividend each year to each man, woman and child from a sovereign wealth fund in recognition of their share in the ownership of Alaska's oil reserves (see Karl Widerquist and Michael Howard. eds. *Exporting the Alaska Model - Adapting the Permanent Fund Dividend for Reform around the World*. Palgrave Macmillan forthcoming 2012).

Several models of a Basic Income have been suggested internationally. The links below provide some information.

- a) Basic Income Earth Network (BIEN) <http://www.basicincome.org/bien/aboutbien.html#ec>
- b) Basic Income Guarantee, Australia (BIGA) <http://www.basicincome.qut.edu.au/>
- c) Basic Income Studies journal <http://www.degruyter.com/view/j/bis>
- d) publications by Palgrave-Macmillan <http://binews.org/2012/03/publications-palgrave-macmillan-releases-first-two-books-in-its-series-%E2%80%9Cexploring-the-basic-income-guarantee%E2%80%9D/>
- e) Guy Standing <http://www.guystanding.com/>
- f) a model of BI based upon unpaid volunteer work or 'mutual obligation' for all adults, to create sustainability regarding costs:  
[http://public-policy.unimelb.edu.au/\\_data/assets/pdf\\_file/0011/509582/Win3.pdf](http://public-policy.unimelb.edu.au/_data/assets/pdf_file/0011/509582/Win3.pdf)
- g) Also Google 'Basic Income' and 'Universal Basic Income'.

This would be a major change in Australia's Taxation and Social Security Law, but one, I suggest, that would support the well-being of all citizens, in addition to addressing the fiscal challenge of an ageing population.

.

Question 31:

**Q. 31 What changes, if any, should be made to family assistance laws and the Family Assistance Guide to remove barriers to mature age participation in the workforce and other productive work?**

Please see my response to Q. 30 above.

Question 32:

Question 33:

**Q. 33. What changes, if any, should be made to child support laws and *The Guide—CSA's Online Guide to the Administration of the New Child Support Scheme* to remove barriers to mature age participation in the workforce and other productive work?**

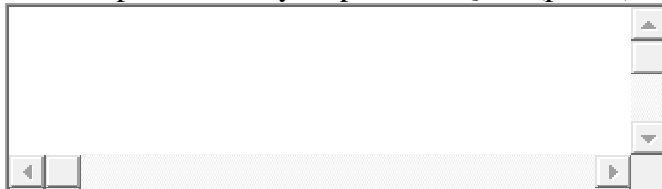
Please see my responses to Questions 30 and 22 above.

Question 34:

Question 35:

**Q. 35. Should s 65 of the *Fair Work Act 2009* (Cth) be amended to include age as a basis upon which an employee may request flexible working arrangements?**

I would prefer the amendment to include 'ill-health and disability' rather than 'age'. For reasons, please see my response to Q. 20 (para 1).



Question 36:

**Q. 36. In practice, do mature age employees negotiate individual flexibility arrangements made under s 202 of the *Fair Work Act 2009* (Cth)? Are such arrangements a useful and appropriate flexibility mechanism for mature age employees?**

A national survey is required for this question and Questions 37-39.

Question 37:

Question 38:

Question 39:

Question 40:

**Q. 40. In what ways, if any, can strategic plans developed under the Australian Work Health and Safety Strategy 2012-2022 take account of occupational health and safety issues of particular relevance to mature age workers?**

It may be desirable to survey mature age persons who have experienced an accident at work in the past five years.

Question 41:

**Q. 41 Where is it best to include information about occupational health and safety issues relevant to mature age workers?**

Such information should refer to all workers - not just mature age workers who are 45 years and over,

It could be mandatory to have an A4 sheet of information in each room of a workplace.

Information about case studies, policies, contact phone numbers and websites in local newspapers would be helpful.

TV advertisements can raise awareness about policies and unsafe work practices.

Question 42:

**Q. 42. In what ways, if any, do occupational health and safety duties and responsibilities act as a barrier to volunteering for mature age persons?**

This question requires a survey of employers.

Question 43:

**Q. 43. What measures involving regulation and monitoring, if any, should be introduced to ensure:**

- a. **employers are responsive to the needs of mature age employees; and**
- b. **mature age employees are actively involved in developing and implementing such measures?**

Make it mandatory for managers to provide evidence of such (eg outcome of meetings with mature age workers) in annual performance reviews

Question 44:

**Q. 44. What are some examples of employment management best practice aimed at attracting or retaining mature age employees?**

Whatever is 'best practice' for all employees should apply to those aged 45 years and over.

Question 45:

**Q. 45. What are the most effective ways of raising awareness and providing education and training to remove barriers to mature age participation in the workforce and other productive work?**

Evidence of attending interactive workshops, workplace videos and successful policy implementation of equal opportunity and disability legislation, plus accommodation of caring responsibilities, could be required of managers in annual performance reviews.

Question 46:

**Q. 46. What other changes, if any, should be made to the employment law framework to remove barriers to mature age participation in the workforce or other productive work?**

In 2007, in Australia, there were a little over one million self-identified casuals, aged 20 years and over, who were employed part-time (less than 35 hours per week). Approximately two thirds were women.

It would be helpful if Australia's national statistical agency, the Australian Bureau of Statistics (ABS) asked the following questions of persons who work part-time in its next survey of *Employment Arrangements, Retirement and Superannuation, Australia* (SEARS):

a) Why do these persons work 'casually' - meaning irregularly - in a situation where the labour contract is insecure and earnings may vary? They are asked why they work *part-time*, but not why they work *casually or irregularly* (this definition is not based on the absence of paid leave). This question is of particular importance to women's patterns of employment because women predominate in numbers in casual, part-time employment.

b) Do they prefer a pattern of 'regular' work; a pattern that is 'casual for a few weeks or months, with periods of no work in between'; a pattern that is 'relief or on call at short notice' or a pattern that is 'varied'? If they prefer a casual, discontinuous or intermittent pattern of employment, it would be helpful to know the reason why e.g. the increased pay loading, time off for school holidays, or some other factor.

c) Do part-time employees who work on a regular or irregular basis prefer the employment benefits of paid annual leave or paid sick leave or a casual loading, and does their employer offer them a choice? It would be helpful to know the percentage and dollar amount of a casual loading.

d) Currently, only a small percentage of casual (irregular) part-time employees are employed at home. It would be helpful if qualitative interviews investigated the reasons why – in case there was scope for increasing the hours of employment of people who are casual part-time employees.

5) It would be helpful to know how many employees would prefer to work in two hour shifts, or other short hours if there is agreement and a signed contract between the employer and employee.

Answers to these research questions are required if Commonwealth employment policies and regulations are to be designed that will optimise the labour force participation of mature aged people, and particularly women..

Question 47:

**Q. 47. Should volunteers be eligible for workers' compensation at a Commonwealth level or is current state and territory coverage sufficient?**

Yes, as long as there is no disadvantage compared with that of the state or territory jurisdiction.

Question 48:

**Q. 48. In what ways, if any, should retirement provisions in Commonwealth workers' compensation legislation be amended? For example, are any of the following approaches appropriate:**

- a. removing all age based restrictions;
- b. removing all age based restrictions, but imposing benefit period or amount restrictions; or
- c. increasing the age at which compensation is no longer payable to age 67, except in certain circumstances?

A policy of Basic Income would be a vast improvement on any Workers' Compensation scheme.

In the meantime, removing all age-based restrictions would minimise cost-shifting from WC scheme to Social Security and minimise stress for a claimant. I am strongly opposed to imposing a restriction on the benefit period or amount of compensation. The stress caused by such arbitrary rules can severely exacerbate a claimant's ill-health and slow the recovery.

It would be preferable for the age restriction for payment of compensation were lifted from 65 to 67, but no age restriction at all would be preferable.

Question 49:

**Q. 49. What other changes, if any, should be made to the Commonwealth workers' compensation scheme to remove barriers to mature age participation in the workforce or other productive work?**

Adversarial practices should be removed. This is probably impossible with current systems. A policy of Basic Income would have that outcome..

Question 50:

**Q. 50. In what ways, if any, do age-based limitations and higher premiums for insurance policies for mature age persons act as a barrier to participation in the workforce or other productive work?**

Are claimants aware of higher premiums? A national probability sample of employers may provide the required information.

Question 51:

**Q. 51. In what ways, if any, should the insurance industry be regulated to address barriers to mature age participation in the workforce or other productive work? For example:**

- a. Should insurance industry Codes of Practice be amended to encourage or mandate the removal or extension of age-based limitations on insurance policies?
- b. Should a regulatory framework be introduced to ensure that age-based limitations on insurance policies are appropriate?

My answers are 'Yes' - and 'no' to a regulatory framework. A Basic Income policy would remove the need for these considerations.

Question 52:

**Q. 52. What other changes, if any, should be made to insurance laws to remove barriers to mature age participation in the workforce or other productive work?**

A Basic Income policy would remove the need for these considerations.

Question 53:

**Q. 53. A skilled migration visa under the *Migration Regulations 1994* (Cth) may only be obtained if the applicant is under 50 years of age. Should the age limit be increased?**

Yes, the age limit should be increased to 60 years.

Question 54:

**Q. 54. In order to obtain a range of visas under the General Skilled Migration category, applicants must obtain a pass mark in a 'points test' where points are allocated according to age, with no points for those aged 45 and over. Should this be amended, and if so, how?**

A screenshot of a text input field with a light gray background and a thin border. The text inside the field is "<p> Yes - no age restriction.</p>". To the right of the text area are two small, vertically stacked arrow buttons (up and down). Below the text area are two larger, horizontally spaced arrow buttons (left and right).

Yes, this age limit should be increased to 65 years..

Question 55:

**Q. 55. An applicant over 50 years of age may not apply for a permanent employer-sponsored visa under the *Migration Regulations 1994* (Cth) from 1 July 2012 unless they are an 'exempt person'.**

- a. **Should the age limit be increased?**
- b. **What considerations should be taken into account in determining whether a person should be eligible for an age exemption?**

Yes, the age limit should be increased to 65 years.

Considerations could include education, skill, character, previous employment and family ties.

File: