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Submission on retirement income to
Tax White Paper Taskforce

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Table of Contents

About Anglicare Australia	3
Taking a comprehensive approach	5
Demographic and budget trends	5
Perceptions of equity	6
Ageing and disadvantage	7
Older People on Newstart	8
Fundamental issues of income	8
Wealth of home	9
The advantages and disadvantage of location	12
A bigger picture	12
Income support	13
Fair taxation	13
Housing.....	14
Health and age care.....	14
Age friendly communities.....	15
Conclusion	15
References	16

About Anglicare Australia

Anglicare Australia is a network of over 40 independent local, state, national and international organisations linked to the Anglican Church and which share values of service, innovation, leadership and the belief that every individual has intrinsic value. Our services are delivered to one in 45 Australians, in partnership with them, the communities in which they live, and other like-minded organisations in those areas. In all, over 13,000 staff and more than 7,000 volunteers work with over 600,000 vulnerable Australians every year delivering diverse services, in every region of Australia.

Anglicare Australia has as its Mission “to engage with all Australians to create communities of resilience, hope and justice”.

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Taking a comprehensive approach

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

Such a holistic review needs to consider matters well beyond the domain of taxation. This Anglicare Australia submission might consequently reflect on other aspects of economic change and government policy. Nonetheless, it is focused on how the tax regime might better support the living standards and the wellbeing of Australians in retirement, especially those most at risk of deprivation, ill health and insecurity.

Demographic and Budget trends

Demographic changes are resulting in the ageing of a growing number and proportion of the population. This means more people living longer with ongoing vitality and capacity; as well as living with some frailty or disability.

It has been much discussed at COAG that Australia's health and aged care costs are growing appreciably (from 9.5 to 12.5% GDP over the next 20 years according to AIHW). Australia's health expenditure is still nonetheless low by OECD standards (Richardson, 2014), so it is important not to get things out of proportion. We note also the key argument raised by state premiers in support of an increase in the GST rate is that health costs overall are rising, and importantly, government revenue needs to rise accordingly. This is a reminder that the goal of this 'better tax' process cannot be to simply lower taxes, but rather to raise adequate revenue efficiently and fairly.

In that context, Anglicare Australia draws your attention to the greater health expenditure made by government on the more affluent, more mobile and better located members of our community, as Meadows et al found in respect to Medicare-funded psychologists and NATSEM's Ben Phillips pointed out at the 2014 Future of Welfare Conference. The issue of access to health services and health outcomes for older Australians is clearly linked strongly to their socio-economic status and their location.

It is particularly important to note in this discussion that age pension expenditure *per se* as a proportion of GDP is NOT growing rapidly, and remains low by OECD standards, currently around 2.5% of GDP (Ingles and Denniss, 2014). Tax expenditure for superannuants however is an area of significant – and seemingly uncontrolled – growth at around 12% pa, possibly reaching 10% GDP by 2050.

Given the regressive nature of the benefits these tax expenditures accrue (Ingles 2009, Denniss, 2013), this raises real issues of both affordability and equity.

As we recommend in our first response to the tax discussion paper ([Common Wealth](#)), government must start the process of reshaping the tax rules that apply to superannuation by looking first at what the existing system has achieved, has cost us, and is likely to cost in the future.

The argument in the public domain, that the ageing population and the cost of old age pensioners is a problem for the whole society, is a dangerous and unfocused one. It is wrong and it avoids the issue. Instead we should be considering how best to encourage those in good circumstances to plan for and fund their own retirement, without inadvertently paying for it all in revenue foregone. Even more importantly we must ensure those who are less affluent and comfortable have somewhere safe to live and the income and resources that would allow them to remain engaged with, and contribute to, our wider society.

Perceptions of equity

The validity for any taxation reform - how much change is acceptable - rests on how it seems to people over all. That is the buy-in that a robust and fair tax system has to earn.

One key problem at present in the public eye is the inordinate tax advantage that accrues to those who already have substantial assets, convenient capital gains concessions and the capacity to make significant concessional superannuation investments. Clearly this comes at a cost to government revenue which could be used to support the most disadvantaged older Australians who lack access to property, superannuation and private income. However, there are also many middle Australians who will see themselves – relative to wealthy high income earners able to organise and minimise their tax and income affairs – as falling behind as these advantages play out.

The other startling inequity revolves around the interplay of the exemption of the family home from the Age Pension asset test and capital gains tax concessions and exemptions more generally. As the Centre for Independent Studies' Simon Cowan and Matthew Taylor pointed out earlier this year, these provisions work to distribute wealth from poorer to more affluent families, while eroding the living standards for older people who don't own their own home in the process.

All of this is particularly galling for those who are benefitting from the relatively small but valuable Low Income Superannuation Contribution program that is about to terminate, and for those who receive no superannuation payments all – even where they have a number of part-time jobs – because their earnings with any single employer is less than \$450 in a month.

If we are to create a robust tax system that raises adequate revenue in a transparent and efficient manner, the general perception that it is a fair system is vital. The task for government (along with civil society if we can work together civilly and cooperatively) is to build that perception. But there are some hot button issues already in this debate. It is not possible for us to reach an intelligent resolution until we deal with those issues in some manner or another.

As indicated above, Anglicare Australia takes the view that a more comprehensive, partnership approach to creating a retirement income plan is needed. However, on the simple matter of superannuation tax expenditure, we suggest starting the conversation by agreeing to:

- reintroduce the low income superannuation contribution
- remove or reshape the minimum income cut off for the superannuation guarantee
- reintroduce some taxation on high end superannuation earnings, possibly starting with small steps on earnings made within the schemes, or on distributions.

Ageing and disadvantage

Anglicare Australia is a network that includes 40 agencies working with disadvantaged and marginalised people across Australia. We know that the income issues some people face at retirement reflect their lives of work, battles with health, various caring responsibilities, and experience of deep and persistent disadvantage prior to retirement age.

While there seems every reason to ensure everyone has the same basic entitlements, the reality is that opportunities and outcomes are unequal for people through their lives, and even something as apparently universal as the age of retirement itself in reality ought to vary according to people's circumstances.

After all, many people, through the work they do, their health and the health of their families can, and would like to, work well beyond the existing retirement age; while for others even 65 can be an unreachable goal in terms of ongoing employment. As estimated in the recent Productivity Commission paper on [Superannuation Policy for Post-Retirement](#), and highlighted by Carers Australia, around half of all Australians who retire between the ages of 45 to 70 do so involuntarily.

What that means is many people are retiring (in effect) on the grossly inadequate Newstart allowance and are consequently poorer, and more unwell and more isolated when they reach old age. As Anglicare Australia has argued continuously (see [Inequality, hardship and social change](#), Anglicare Australia's submission to the 2014 Senate Inquiry on income inequality) inadequate incomes impact on the ongoing quality of life, and that permanently damages the wellbeing of people reliant on them. More pointedly – and despite continual tabloid media implications to the contrary – it makes it increasingly difficult for those people to find work, remain engaged in education and care for their families.

All of those things of course then impact on people's long term wealth, health and independence. It is for that reason Anglicare Australia is focusing its argument in this submission on retirement incomes on the need to ensure a reasonable standard of living for the poorest and most vulnerable members of our community as they age.

The inflexible approach to retirement age is designed around an expectation of equal life outcomes in mainstream Australia. It reflects the narrow life experience of most policymakers and a failure of the imagination needed to construct social policy, which takes account of the inequities that are a part and parcel of life. Any level headed reflection on the vulnerability of older people with limited attachment to the paid work – through their own or family ill health, poor education and other forms of social exclusion - would also consider the incidence of age discrimination when it comes to finding, retaining and improving the quality of work.

Older people on Newstart

It is salutary, and pertinent, to consider the consequences for someone without work, relying for extended periods of time on the Newstart allowance as they near retirement age.

Newstart for a single adult is \$259 a week and \$234 per week each for a couple. DSS Data from June 2013 showed over 265,000 people over the age of 45 were recipients of this inadequate allowance; close to 70% (185,033) of whom had been receiving the income support payment for one year or more.

That is simply hard evidence reflecting the experience of Anglicare service users. As people get closer to the formal pension or retirement age their chance of finding a good job – if they are out of work – diminishes.

The obvious consequence is that people in that predicament face increasing hardship and poverty at a time when their physical resilience is likely to be falling.

Anglicare Australia has consistently argued for flexibility in regard the interface between income support – such as Newstart – and work. In addressing Christians for an Ethical Society (ACT) on [Unemployment: causes, consequences and cures](#) in September 2014, Anglicare Australia Executive Director, Kasy Chambers argued for edges of various government benefits to become more porous so those who are least secure are not required to risk what little security they have if they look for and accept casual and part time employment.

Anglicare Australia suggests a similar approach might be pertinent to accessing the age pension, and the proposed extension of the retirement age for healthy and reasonably affluent Australians ought to be balanced by early retirement options becoming available to those with a history of illness, increasing frailty and caring responsibilities.

Government should also consider raising the liquid asset limit above the present \$5,500 for Newstart recipients over 45 years so they have some small chance of moving onto the Age Pension with some resources – and hence financial security – behind them.

Fundamental issues of income

In Anglicare Australia's first submission to this inquiry ([Common Wealth](#)), we argued that any fair taxation system would ensure the collection of revenue that could fund support and services to an appropriate level.

Adequacy of income underpins all the analysis we have in our society on health and wellbeing. Anglicare Australia's 2012 national survey on food insecurity, [When There's Not Enough To Eat](#), explored the predictors and the impacts of inadequate and poor quality food on Anglicare network clients. It offered both quantitative and qualitative evidence of the damaging consequences on people's the health and wellbeing of truly low incomes, such as the inarguably and inexcusably inadequate Newstart and Youth allowances.

Key NATSEM research commissioned by Anglicare Australia, also in 2012, [Going Without: Financial Hardship in Australia](#), makes it explicit that people depending on those allowances are inevitably going backwards.

The same thing is undoubtedly true for those relying on the relatively more generous Age Pension, particularly where they do not own their own house and especially when they confront unexpected financial costs, are dealing with health issues, have unfunded family responsibilities, or are locationally disadvantaged; as discussed below.

Anglicare Australia has, over many years, called for the level of social security benefits – pensions and allowances – to be set by an independent body such as, for example, the Fair Work Commissioner. The government itself has recently floated the notion of seeking independent advice (at the very least) on what a fair or adequate income would be. Any comprehensive review of retirement income arrangements in Australia has to include a consideration of fundamental income support available to citizens during their working years, as well as in their old age.

Wealth of home

One other principal factor in determining the quality of retirement living is housing.

Private home ownership and secure public housing (where it exists) underwrite the capacity older Australians to remain connected, continue to make a contribution to the community around them, maintain their independence and access care and services they need as they age.

Private home ownership has the added and significant benefit of being an asset that can be drawn on in times of illness, stress or unexpected expense. It adds to people's resilience, with – consequently – a lower cost on our society (or the “taxpayer”) as well as the more positive benefit of supporting the home owner to contribute socially and economically to society and the communities they are a part of.

Anglicare Australia conducts a Rental Affordability Snapshot in April each year. The Snapshot is conclusive evidence there is a critical shortage of rental housing that is affordable to people living on low incomes. Key relevant findings from this year's Snapshot can be found below.

The [2015 Rental Affordability Snapshot report](#) also includes a discussion on older Australians and housing stress that warrants quoting at some length:

Older Australians and housing stress

A desire to age at home

Australia has an ageing population. The latest Intergenerational Report¹ shows the number

¹ IGR (2015), *2015 Intergenerational Report: Australia in 2055*, Australian Government, Canberra.

of Australians aged over 65 is projected to more than double by 2055, with one in 1,000 people projected to live over 100. While technological and medical advancement means people could live healthier and longer lives in the future, it doesn't follow that everyone who lives for a long time could have a good quality of life, especially in their final years.

Research by think tank Per Capita² argued that the current housing policies for the ageing population have not been successful due to a predominantly 'rational' and 'financially sound' approach, which does not account for the psychological relationship between ageing and the home. For many older Australians, the home means much more than just a space to live and rest. A home for them may be a repository of history and memories that is worth holding on to. The home can also provide a sense of independence and of managing uncertainty, which has a positive effect on the health of the ageing individual³. It is therefore unhelpful when the public policy is based only on 'the presumption of 'good information, clear preferences and rational decision-making'⁴, and prioritises the effective use of housing stock above other non-financial attributes such as memories and attachment to the home and neighbourhood. To this end, financial incentives and rational arguments alone may not encourage older people to downsize and make more 'efficient use' of existing housing stock.

Older non-home owners and housing stress

While ageing is inevitable, it is that inevitability which drives many homeowners to consider asset management in relation to their future capabilities and health levels. That is, many have some idea as to when and how they might be prepared to downsize their home or look to other financing arrangements to support their future care. For older Australians who live on low incomes and who are not homeowners, the outlook can be very different. With the aged care and pensions systems that are in effect designed for homeowners, the poverty rate after housing costs have been deducted is higher for non-house owning households. These are households which are predominantly depending on the private rental market or the social housing system for accommodation. Low incomes limit this cohort's choice of suitable homes irrespective of competing on other grounds in a tight rental market. The lack of income also means a reduced capacity to seek home maintenance and modification services to adapt their homes to their ageing needs. While those who have used these services feel more independent and safer in their homes, and in turn have better health and quality of life⁵, older people living on low incomes have limited options in this regard.

With a scarce supply of housing in the private market, older people may be required to move into residential aged care at an earlier age, which can be as, or more, costly than private rentals. Having little self-determining power over where they live, some may develop feelings of isolation and loss of control in their lives, in turn placing more stress on their mental and physical health, and going against the positive ageing ethos that is promoted in our society.

Policy and reforms for the ageing population

While home ownership is high among present day over 65s, at 82%⁶, greater proportions of the future aged population will hold mortgage debt or be renting. Without a corresponding increase in housing supply to match demand, the result will be an even higher demand of appropriate housing stock. A policy mix that adapts the current housing stock for household makeup, security of tenure for longer lives, while also adding to the supply of new housing, particularly for the most

² Millane, Emily (2015), [The Head, The Heart & The House: Health, Care and Quality of Life](#), Per Capita Australia.

³ Ibid, p.12

⁴ Ibid

vulnerable is therefore of paramount importance. Sustainable and client-centred aged care reform, including a better paid aged care workforce, could also ensure current and future generations of older Australians can live a life with dignity.

⁵ Jones, A.; de Jonge, D. & Phillips, R. (2008), *The role of home maintenance and modification services in achieving health, community care and housing outcomes in later life*, AHURI, Brisbane.

⁶ Australian Bureau of Statistics (2011), *Census of Population and Housing*, cat. no. 2001.0, ABS, Canberra

Older Australians on low incomes face a particularly acute and growing problem. The private rental market simply doesn't cater for people living on pensions or allowances. And it is a growing problem.

The (former) Department of Families, Housing, Community Services and Indigenous Affairs' figures drawn from the 2011 census showed the number of older people renting privately in Australia grew by over 100,000 from 2006. That is an increase of around 40% for men and 48% for women over five years. Evidence from Anglicare services is that these numbers are continuing to grow, and at a greater rate. Next year's census will give us more hard data on the extent.

What the Anglicare Australia's 2015 Snapshot found was that nationally, singles living on an Age Pension would be able to afford 0.9% of the total 65,614 rental properties surveyed on a weekend in April, equating to 593 dwellings across Australia. A couple living on the Age Pension would be able to afford 4% or 2,239 properties of those listed. It almost goes without saying that in a competitive rental environment most aged pensioners would have little chance of winning a room in a group house, even when it was affordable, and that pensioner couples would still be competing with other families and groups for the houses and units which fell into their range.

And while it is not the heart of the matter for those people themselves, Anglicare Australia reminds the Tax White Paper Unit that the cost to Australia's wider community ('the taxpayer') of people living on the street and accessing emergency services and healthcare, or living in residential aged care (as people unable to afford rental private rental will inevitably do) is well above the cost of care and support in the home. According to the DSS report on the Operation of the Aged Care Act for 2013, the average annual cost to government of residential care is \$56,000 per person, while the average cost to government of a Home Care Package is around \$18,600. At a more extreme level, we are aware of instances where emergency medical care and support required by people living rough comes to several hundred thousand dollars a year.

Anglicare Australia is not alone in calling for a comprehensive national strategy to substantially grow the supply of housing that is secure and affordable to people on low incomes. In addition to the five point plan the Anglicare network has championed through the latest Snapshot, we point to [Tackling housing unaffordability: a 10-point national plan](#) developed by the UNSW's Professor Hal Pawson and partners and published in *The Conversation* in June 2015, which offers a more detailed and localised approach.

The advantages and disadvantages of location

People who live in rural and remote Australia have to travel extensively to access (or perhaps pay more to access) health services - particularly the kind of health support that is most helpful to people with the chronic health conditions, including mental health conditions, that are a feature of ageing in our increasingly long lived society.

It would make sense to consider the way the health safety-net works for people in rural and remote Australia, and whether expenditures should include a travel component, or whether the threshold of Medicare funded costs should be reduced for people in rural and remote locations, or if a tax allowance or rebate might come into play as medical costs increase for people locationally disadvantaged.

There are other more specific areas of regional disadvantage, often on the edge the metropolitan edges. *Dropping off the Edge 2015*, the recent report by Tony Vinson et al for Jesuit Social Services and Catholic Social Services Australia points to the harder edge of locational disadvantage. It eloquently explores the web of disadvantage which has trapped some communities in high rates of ill health, crime, unemployment and poverty. The best strategies to break the pattern revolve around real community development, and that requires the aged as well as the young to be connected and included, as well as adequate funding for the services they need. That might seem irrelevant in the context of a consideration of retirement incomes, but an adequate income and support for that involvement has cost savings and social benefits for older people and their community.

A bigger picture

There are two sides to this review of tax issues relating to retirement income.

- 1 One lies in identifying the goals or targets we should be aiming at: that is, looking for common agreement on what they are.
- 2 The other is on deciding what initiatives or decision we need to take in order to reach those goals, so that where we don't succeed in making progress we can change the policy settings accordingly.

These are both wide ranging exercises that really need buy-in from right across our society. But they need to be addressed separately.

We have seen that there is not an issue with demographic factors in themselves creating a problem for the Budget, and that retirement incomes for many Australians – combined with good access to health services, strong family or community connections, and home ownership – would seem to ensure they can look forward to relatively comfortable and meaningful retirement.

However, there are a number of factors in the configuration of our tax and social services that advantage the most advantaged and compound the hardship faced by others.

Adequate income support, the availability of secure and appropriate housing, access to high quality health and social services, and support that allows people to remain in work or to otherwise participate in society are the outcomes we should be seeking. And we should start by looking to ensure those outcomes for people who truly are doing it the toughest.

In terms of actual initiatives or recommendations, you will note that Anglicare Australia is not limiting its proposals to tax initiatives. As we have made clear above, tax is only one element of the retirement income equation and a broader approach in thinking is essential.

INCOME SUPPORT

The introduction of an arms-length tribunal to set (or at the very least recommend) a fair and adequate level of pensions and allowances (Newstart payments are \$519 a fortnight).

In regard to old Australians who have irregular, inconsistent employment and are living on low incomes, Anglicare Australia calls on the government to look at freeing up the Newstart liquid assets test for people 45 and over.

Furthermore, that it recognises the unequal circumstances for people across the workforce as they approach nominal retirement age, and considers making early retirement an option for people with who have long term unemployment histories, or illness, injury, caring duties and other barriers to full workforce participation in later years.

FAIR TAXATION

Any proposed changes to taxation should be judged against the impact they will have on those who are most vulnerable and living in greatest hardship.

People who are on middle to upper incomes should carry their share of the taxation 'burden' and be seen by all to do so.

In the context of Australia's progressive income tax regime, current superannuation arrangements appreciably advantage people on high incomes, with substantial wealth and the capacity to organise their finances. They allow for substantial concessional contributions to superannuation and - once a person has passed retirement age – tax free earnings within and distributions from superannuation accounts. Anglicare Australia recommends a close appraisal of the impact of these arrangements, the reintroduction of the low income superannuation contribution, the reintroduction of taxation on earnings within superannuation schemes and the removal or lowering of the \$450 minimum income level for superannuation guarantee payments.

Any reform to our taxation system must include the elimination of unfair advantages for the most advantaged at the cost of those the least able to support themselves.

We draw attention to the various recommendations of the Business Council of Australia, Australian Council of Social Services, the Grattan Institute, The Australia Institute, the Centre for Independent Studies and the Financial Systems Inquiry led by David Murray AO on this matter.

HOUSING

Anglicare Australia reiterates its call for a national affordable housing plan, and points again to the more detailed work of Professor Pawson et al [Tackling housing unaffordability: a 10-point national plan](#) which illustrates breadth of this understanding.

In the context of this retirement income submission, we point to the particular needs and concerns for people as they age; which revolve around security of tenure, universal and adaptable design, links to transport and access community services.

Anglicare Australia reminds readers that it is both closed minded and destructive to rule out any sensible analysis of the impact current negative gearing and capital gains tax rules might have on the supply of appropriate *affordable* rental housing. It is easy enough for political leaders of any persuasion to put a gloss on an idea in order to make it sound either essential or completely unacceptable. There is no doubt however that informed non-partisan experts have been calling for such an analysis, and the subsequent re-shaping of those tax rules, should it be found to make a difference.

HEALTH AND AGED CARE

It has been a welcome change in the tone of tax debate that the possible rise of the GST has been linked to the provision of health care rather than a cut in taxes. Anglicare does not support an increase in the rate of GST but would welcome the opportunity to explore the impact of broadening its base, to ensure that any additional revenue come from those most, rather than least, able to afford it.

There are other sources of revenue which are intrinsically fairer and would also drive positive social or environmental outcomes (ranging from a volumetric alcohol duty to the reintroduction of a carbon price), which also should be considered.

More specifically, in terms of the quality of life of people as they age, an increased investment in health and aged care services in rural, remote and disadvantaged areas in Australia is necessary.

It was surprising to see the *Re:think* Tax Discussion Paper makes reference to income tax exemption and mutuality, but fail to consider the social (and economic) benefits that mutuals can deliver to the wider community. Anglicare notes the success of community owned models of primary health services, such as the National Health Cooperative. While there have been issues perhaps in the past in winding down mutuals once they reach their use by date, there is a strong case to argue they are invaluable in innovation and building capacity, as the National Health Cooperative has shown.

It would be an expensive and retrograde step to take away that important opportunity for communities of interest to build the health, housing and care resources that they need.

AGE FRIENDLY CITIES

People are living in retirement for longer than in the past; and accessibility, independence and community connection have become more important to them, and to us all.

A move towards age friendly communities, with a focus on designing buildings, infrastructure and services to enhance the quality of life people enjoy as they age - whatever their wealth and income - is in essence the social wage which will keep down the future cost to tax payers.

We need a tax system that supports an approach to government with the vision of a society where older people's presence and contribution is valued. We know that long term investment can be influenced by taxation policy. In this domain, it would require governments at all levels agreeing to national directions for such development, and an appropriate response in term of tax and other economic policy to support.

Conclusion

Anglicare Australia appreciates the opportunity to contribute to the retirement income debate through this submission to the Tax White Paper process.

We open this paper with the argument that it makes no sense to look at a narrow cluster of issues on taxation and retirement when we need a much broader review of all retirement income, and retirement living, arrangements in Australia.

Our key concern regarding retirement incomes is that those people who are the most disadvantaged and vulnerable face the hardest transition into retirement, and the most insecure and difficult old age.

Australia's superannuation system rewards those who can afford to put money aside; and the more they have when they reach retirement, the more they can earn tax free.

The tax system rewards those who own their own homes, and especially rewards those with houses worth millions.

Australia has a rental housing crisis which is fed, in part, by tax rules that advantage the most advantaged. Anyone approaching retirement age without a well-paying job, and without their own home, is likely to be left behind.

It is often said that retirement income has three pillars: savings, superannuation and the pension. We suggest there should be a fourth pillar: safe and secure housing.

Over the past year we have seen a wealth of sophisticated analysis and discussion on the inequities and inefficiencies of our taxation, pensions, income and housing systems. But far too little of that sophisticated discussion has been apparent in Parliament.

We all know there are demographic changes coming upon us. The most recent Intergenerational Report and indeed this element of the Tax White Paper process reflect that.

We urgently need to put in place a robust system that looks after those without wealth or income, before the number of older Australians with a vested interest in the status quo makes necessary level of change impossible.

But the lack of political will to take an inclusive and wide ranging approach to retirement income threatens to hold us back.

Anglicare Australia, among many others expert and representative organisations, has taken every opportunity to inform this debate. But it will be a waste of time – or worse – for us all if it doesn't lead to the adoption of a more integrated approach.

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