

JANUARY 2023



**Suicide Prevention
Australia**

Royal Commission into the Robodebt Scheme

Submission

For general enquiries:

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Imagine a world without suicide

Recommendations

1. Commonwealth Government to introduce a *Suicide Prevention Act* requiring all Commonwealth agencies to consider suicide prevention in their policy and program development.
2. Commonwealth Government to provide additional funding to enable Services Australia to employ additional Centrelink social workers to deliver support to people at risk of suicide.
3. Commonwealth Government to ensure evidence-based suicide prevention training is provided for all frontline Centrelink, employment service and child support service employees.
4. Commonwealth Government to amend the mutual obligations system and its automation via the Targeted Compliance Framework and place decision-making with economic support providers to ensure consideration for people at risk of suicide.

Introduction

Suicide Prevention Australia is the national peak body for the suicide prevention sector. With over 380 members representing more than 140,000 workers, staff and volunteers across Australia, we provide a collective voice for service providers, practitioners, researchers, local collaboratives and people with lived experience.

Over 3,000 people tragically die by suicide and an estimated 65,000 people attempt suicide each year. Over 7.5 million Australians have been impacted by suicide. Our shared vision is a world without suicide and with our members, we work to inform through data and evidence; influence systemic changes that drive down suicide rates and build capability and capacity.

We welcome the opportunity to make a submission to the Royal Commission into the Robodebt Scheme. Links between unemployment, financial insecurity, homelessness and suicidality are, sadly, well established.

Socioeconomic status is strongly associated with deaths by suicide.¹ Over the past 10 years age-standardised suicide rates were highest for those living in the lowest socioeconomic areas.² In 2020, the overall suicide rate for people living in the lowest socioeconomic (most disadvantaged) areas (18.1 deaths per 100,000) was twice that of those living in the highest socioeconomic (least disadvantaged) areas (8.6 deaths per 100,000).³ Risk of suicide in Australia has been found to be associated with lower levels of education,⁴ and with unemployment similarly to other Western countries.^{5,6}

¹ AIHW. (2020). Suicide, by socioeconomic areas, Suicide & Self-Harm Monitoring, available online: <https://www.aihw.gov.au/suicide-self-harm-monitoring/data/behaviours-risk-factors/suicide-by-socioeconomic-areas>.

² Ibid.

³ Ibid.

⁴ AIHW. (2021). Suicide & self-harm monitoring, Social factors and deaths by suicide, available online: <https://www.aihw.gov.au/suicide-self-harm-monitoring/data/behaviours-risk-factors/social-factors-suicide#Educational%20attainment,%20employment%20and%20deaths%20by%20suicide>.

⁵ Ibid.

⁶ Gunnell, D., Platt, S. & Hawton, K. (2009). The economic crisis and suicide, *BMJ*, 338, available online: <https://www.bmj.com/content/338/bmj.b1891.short>.

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Australian households where income support payments are their main source of income, 55% receiving Newstart and 64% receiving Youth Allowance, are living in poverty.⁷ The Senate Community Affairs References Committee reported significant evidence was raised on the inadequacy of income support payments and their current ability to meet basic living needs during their inquiry into poverty and financial hardship.⁸

The Robodebt Scheme has been found to have unfairly targeted people, creating fear, anxiety, and shame among many of whom were already living in precarious situations.⁹ The Robodebt Scheme removed a critical step in our social service system – human interface, compassion, and decision-making – to automate debt notices and place onus on the individual to prove the debt was false.

Two mothers reported to a Senate Committee in 2020 stating their sons died by suicide after receiving debt notices via the Scheme.^{10,11} One mother reported her son had argued with Centrelink the day he died. Another mother reported her son received six debt collector notices in the period of one month before dying by suicide.¹² Greens Senator Rachel Siewert has further reported hearing of five families who lost a family member to suicide due to receiving a debt notice from the Robodebt Scheme.¹³

We know that for every life lost to suicide, up to 135 individuals may be impacted by suicide.^{14,15,16} Bereavement by suicide has been evidenced as a risk factor for subsequent suicide, regardless of whether the relationship to the person who died by suicide is a blood-

⁷ Davidson, P., Saunders, P., Bradbury, B. & Wong, M. (2018). Poverty in Australia. ACROSS/UNSW Poverty and Inequality Partnership Report No. 2, Sydney.

⁸ The Senate Community Affairs References Committee. (2004). A hand up not a hand out: Renewing the fight against poverty, *Commonwealth of Australia*, available online: https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/Completed_inquiries/2002-04/poverty/report/index.

⁹ Redden, J. (2018). The Harm That Data Do, *Cardiff University, Journal of Scientific American*, available online:

<https://orca.cardiff.ac.uk/id/eprint/115973/1/Redden%20The%20Harm%20That%20Data%20Do.pdf>.

¹⁰ McPherson, E. (2020). Mothers who lost sons to suicide after Centrelink debts write heartbreaking letters to Senate, *Nine News*, available online: <https://www.9news.com.au/national/centrelink-robodebt-mothers-who-lost-sons-to-suicide-write-heartbreaking-letters-to-senate/d69bd6fc-2257-4a83-ae77-5c5c6b1384f4>.

¹¹ Community Affairs Reference Committee. (2022). Accountability and justice: Why we need a Royal Commission into Robodebt, *The Senate*, available online:

https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/024846/toc_pdf/AccountabilityandJusticeWhyweneedaRoyalCommissionintoRobodebt.pdf;fileType=application%2Fpdf.

¹² Ibid.

¹³ Henriques-Gomes, L. (2020). 'Not correct' that robodebt caused suicides, former head of Human Services says, *The Guardian*, available online: <https://www.theguardian.com/australia-news/2020/jul/31/not-correct-that-robodebt-caused-suicides-former-head-of-human-services-says>.

¹⁴ Andriessen, K., Krysinska, K., Kolves, K. & Reavley, N. (2019). Suicide postvention services: an Evidence Check rapid review brokered by the Sax Institute, *NSW Ministry of Health, Sax Institute*. Retrieved from https://www.saxinstitute.org.au/wp-content/uploads/2019_Suicide-Postvention-Report.pdf.

¹⁵ National Suicide Prevention Taskforce. (2020). Interim Advice Report: Towards a national whole-of-government approach to suicide prevention in Australia. Canberra.

¹⁶ Cerel, J., Brown, M.M, Maple, M., Singleton, M., Van De Venne, J., Moore, M. & Flaherty, C. (2019). How many people are exposed to suicide? Not six, *The American Association of Suicidology*, 49(2).

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relative or not.¹⁷ Submissions to the previous Senate Inquiry report further experiences of suicidality as a result of the debt notices issued by the Scheme.^{18,19}

The Federal Court concluded that key features of the Robodebt program were unlawful in 2019.²⁰ Had adequate consideration been given to suicide prevention of the Scheme by policy makers, the distress and harm caused by the Scheme to vulnerable Australians could have been prevented in its conception. Legislative requirements to consider suicide prevention in all policy and program development is essential moving forward if we are to protect vulnerable Australians from future risks of suicide.

In December 2022, Scott Morrison MP gave evidence to the Royal Commission stating²¹

“there was nothing to suggest to me in the submission that went to Cabinet that it was unlawful, and no evidence was presented about that submission that it was unlawful at that time... if there were any legal impediment to pursuing a course of action by the government, not only would it be noted in that checklist (New Policy Proposal), but it would be amplified in the document itself. And there was no such reference. And there never was.”²¹

This evidence provided to the Commission illustrates the lack of legislative checks and balances to prevent the harm Robodebt caused to the Australian community and future failures of public administration.

The need for suicide prevention legislation

In 2021, South Australia was the first jurisdiction in Australia to introduce a *Suicide Prevention Act*. The Act legislated a whole of government, cross-agency approach to suicide prevention for the State.²² A key element of which, is the requirement for relevant state government agencies to have their own suicide prevention action plans which set out how the agency or department will prevent suicide by members of the community that engage with the authority. All government agencies are further required to adhere to the State Suicide Prevention Plan.

¹⁷ Pitman, A.L., Osborn, D.P.J, Rantell, K. & King, M.B. (2016). Bereavement by suicide as a risk factor for suicide attempt: a cross-sectional national UK-wide study of 3432 young bereaved adults, *BMJ Open*, 6.

¹⁸ Community Affairs Reference Committee. (2017). Design, scope, cost-benefit analysis, contracts awarded and implementation associated with the Better Management of the Social Welfare System initiative, *The Senate*, available online: https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/SocialWelfareSystem/Report.

¹⁹ Ibid.

²⁰ Whiteford, P. (2021). Debt by design: The anatomy of a social policy fiasco – Or was it something worse?, *Australian Journal of Public Administration*, available online: <https://onlinelibrary.wiley.com/doi/full/10.1111/1467-8500.12479>.

²¹ Royal Commission into the Robodebt Scheme. (2022). Transcript of Proceedings, Wednesday 14 December 2022 at 10.01am (AEST), available online: <https://robodebt.royalcommission.gov.au/system/files/2022-12/transcript-hearing-day-20-14-dec-2022.pdf>.

²² Government of South Australia. (2021). Suicide Prevention Act 2021, No. 51.

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If the Commonwealth Government had a Suicide Prevention Act to adhere to at the time of designing the Robodebt Scheme, we believe the harm caused by the Scheme could have been avoided due to policy-makers having to consider the impact of suicide in the community when designing policies and programs.

In practice, officials preparing Cabinet Submissions and New Policy Proposals for the Scheme would have been required to consider whether the arrangement would result in any increased risk of suicide and if so, what steps could be taken to mitigate such a risk. For example, consideration may have been given to additional safeguards, further training, seeking advice from mental health professionals on the wording of correspondence.

A national Suicide Prevention Act is the missing link to whole-of-government suicide prevention. Legislation is key to secure suicide prevention as a lasting cross-agency priority. With half of those who die from suicide not accessing mental health services²³, the only way to meaningfully reduce suicides is through whole-of-government action. An Act is necessary to ensure decision-makers across Government are united in working to prevent suicides. Legislation can ensure clear shared and individual accountability and focus agencies on practical and measurable steps to reduce and prevent suicide.

There is strong sector and community support for an Act. Three out of four sector respondents to the 2022 State of the Nation in Suicide Prevention supported a Suicide Prevention Act and over 40 organisations and sector leaders representing over 40,000 staff and volunteers in the sector urged Members of Parliament to introduce legislation. Almost 4 out of 5 (79%) of Australians surveyed supported a national Suicide Prevention Act.

Suicide prevention legislation as part of a whole of government response to suicide has emerged internationally in Japan, Republic of Korea, Argentina, and Canada. Japan's suicide prevention legislation which was first introduced in 2006 has led national efforts in significantly reducing suicide rates in the country, with a decrease in deaths by suicide of 40% over 15 years which included ten straight years of decline from 2009.²⁴ The Republic of Korea first introduced whole of government suicide prevention legislation in 2011 and experienced a downward trend in suicide rates for the period of 2013-2017.^{25,26}

In order to prevent harm and distress caused by Governments in policy and decision-making, the Commonwealth Government should introduce a *Suicide Prevention Act*

²³ National Suicide Prevention Adviser. Connected and Compassionate: Implementing a national whole of governments approach to suicide prevention (Final Advice). Canberra; December 2020.

²⁴ Reuters. (2020). Japanese suicides decline to lowest in over 40 years, *Suicide Prevention Resource Centre*, available online: <https://www.sprc.org/news/japanese-suicides-decline-lowest-over-40-years>.

²⁵ Paik, J.W. (2021). Suicide prevention action plan and post suicide attempt case management in South Korea, *Journal of Asia-Pacific Psychiatry*, 13(SUPPL 1), available online: <https://pesquisa.bvsalud.org/global-literature-on-novel-coronavirus-2019-ncov/resource/pt/covidwho-1214766>.

²⁶ World Health Organisation. (2019). Suicide mortality rate (per 100,000 population) – Korea, Rep., *Global Health Observatory Data Repository*, available online: <https://data.worldbank.org/indicator/SH.STA.SUIC.P5?end=2019&locations=KR&start=2011>.

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requiring all Commonwealth authorities, including the Departments of Human Services and Social Services, to consider suicide prevention in their policy and program development.

Recommendations

1. Commonwealth Government to introduce a *Suicide Prevention Act* requiring all state authorities to consider suicide prevention in their policy and program development.

Responding to distress in the community and suicide prevention in human services

Research has found levels of personal debt are also associated with suicidal ideation even after adjusting for socioeconomic factors, lifestyle behaviours and other risk factors.²⁷ The Productivity Commission identified those experiencing financial distress or unemployment are at higher risk of developing mental illness, and those on income support payments are more likely to experience poverty.²⁸ The Productivity Commission reported that improving people's overall quality of life, in particular in areas of mental health, employment, and income have significant long term economic benefits.²⁹

Many Australians who receive income support payments may be in distress. The automation of systems to replace human decision-making and compassion can elevate distress levels further among already vulnerable Australians.

For example, the Targeted Compliance Framework has negative impacts on Australians struggling to meet basic needs, and failure to meet mutual obligations results in financial penalties. The automation of demerit points removes the ability for discretion to be utilised based on a person's circumstances.³⁰

People who rely on social security payments to meet basic living needs such as food and housing live in ongoing fear of payments being cut off abruptly over failure to meet compliance obligations for payments. Suspension of payments is automatically made by the system, creating a gap in decision-making processes.³¹ The system further fails to consider an individual's capacity for access to technology and level of education to record compliance obligations prior to income support being stopped.

We also know that some population groups at risk of suicide are over-represented among income support recipients. For example, Aboriginal and Torres Strait Islander peoples represent 53% of income support recipients compared to 26% of the general population aged 16 and over.³² The age-standardised suicide rate of Aboriginal and Torres Strait

²⁷ Meltzer H, Bebbington P, Brugha T, Jenkins R, McManus S, Dennis MS. (2011). 'Personal debt and suicidal ideation', *Psychological Medicine*, 41(4):771-8, available online: <https://pubmed.ncbi.nlm.nih.gov/20550757/>.

²⁸ Ibid.

²⁹ Ibid.

³⁰ Casey, S. (2019). The Targeted Compliance Framework – Implications for job seekers, *Economic Justice Australia*, available online: <https://www.ejaustralia.org.au/wp/social-security-rights-review/the-targeted-compliance-framework-implications-for-job-seekers/>.

³¹ Ibid.

³² AIHW. (2021). Income and income support, *Australian Institute of Health and Welfare, Australian Government*, available online: <https://www.aihw.gov.au/reports/australias-welfare/income-support>.

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Islander peoples is 27.1 deaths per 100,000 population compared to the general Australian population of 12.0 per 100,000 population.³³

Given people engaging with Services Australia are likely to be experiencing distress, the Commonwealth Government should appropriately resource Services Australia to provide additional Centrelink social workers to deliver support to people at risk of suicide who present to Centrelink.

Additional measures should be taken to mediate distress experienced in the community by ensuring suicide prevention training is provided for all frontline Centrelink, employment service and child service employees, and abolish the automation of mutual obligation systems to return decision-making back to support providers who can ensure consideration for people at risk of suicide.

Recommendations

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2. Commonwealth Government to provide additional funding to enable Services Australia to employ additional Centrelink social workers to deliver support to people at risk of suicide.

 3. Commonwealth Government to ensure evidence-based suicide prevention training is provided for all frontline Centrelink, employment service and child support service employees.

 4. Commonwealth Government to amend the mutual obligations system and its automation via the Targeted Compliance Framework and place decision-making with economic support providers to ensure consideration for people at risk of suicide.
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³³ ABS. (2021). Causes of death, Australia, available online:
<https://www.abs.gov.au/statistics/health/causes-death/causes-death-australia/latest-release#intentional-self-harm-deaths-suicide-in-australia>.

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Acknowledgements Statement

Suicide Prevention Australia acknowledges the unique and important understanding provided by people with lived and living experience. This knowledge and insight is critical in all aspects of suicide prevention policy, practice and research. We drew from existing policy positions which were developed with our members and people with lived experience to prepare this submission.

As the national peak body for suicide prevention, our members are central to all that we do. Advice from our members, including the largest and many of the smallest organisations working in suicide prevention, as well as practitioners, researchers and community leaders is key to the development of our policy positions. Suicide Prevention Australia thanks all involved in the development of this policy position.

There are crisis services available 24/7 if you or someone you know is in distress

Lifeline: 13 11 14 Standby Support After Suicide: 1300 727 247
www.lifeline.org.au www.standbysupport.com.au

Suicide Call Back Service: _____
1300 659 467 www.suicidecallbackservice.org.au

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