

Homelessness Australia: submission to the Review of Australia's Welfare System, August 2014

Pillar One: Simpler and sustainable income support system

Simpler architecture

The starting point for any reorganisation of the system should be that all income support payments are subject to the same means-testing, by reference to both income and assets (with appropriate exemptions for principal residence, capped at a level not far above median house price for that location; business assets such as agricultural land; accumulated superannuation below a certain level, eg \$500,000). ***This principle should be encoded in legislation to avoid future deviations from it. Payments not presently means-tested at all (eg most Assistance for Isolated Children (AIC) allowances, Carer Allowance, ABSTUDY), or not assets-tested (Family Tax Benefit, Commonwealth Seniors Health Care Card) should be subject to this discipline before any reductions in the level or indexation of other payments is considered.*** As the Review Team has pointed out, ***inadequate means-testing has an effect beyond the immediate payment:*** eg having assets but an income below \$50,000 entitles a family to receive both FTB A and either the AIC Boarding Allowance (which appears to cover many of the same costs as FTB) or Rent Assistance.

Like the Australian Council of Social Service, ***Homelessness Australia prefers the 2000 McClure Review's recommendation that the gap between pensions and allowances be closed by adopting a common base payment with add-ons***, rather than tiered payments for working age people. Without underlying commonality across the entire system, there remains a risk that the types of allowances paid to very disadvantaged or relatively voiceless people will fall behind again. Once a common base is established, we would support add-on payments to cover the costs of seeking or participating in employment or education, raising children, securing and maintaining housing, living (or caring for someone with) a disability and perhaps even achieving a certain age. ***It is important that similar consideration be given to costly life experiences of vulnerable people, eg:***

- *it is essential that some kind of **Crisis Payment** be retained,*
- *the level of the **Transition to Independent Living Allowance** for young people leaving state care should be increased so as to take account of the true costs of establishing housing against a background of disadvantage, and the payment reinstated for other types of young care leavers;*
- ***payments to assist low-income people with the costs of relocation to study or work** (eg the present **Relocation Scholarship** and **Relocation Assistance to Take Up a Job**) should be paid to everyone (or at least everyone entitled to full payments) at rates based on relocation costs. In particular, eligible recipients who move from the country to the city should not be denied RATUJ at the higher rate if the move allows them to obtain affordable housing;*
- *job-seekers should continue to benefit from participation and employment initiatives such as the **Job Commitment Bonus** or **youth wage subsidies**.*

It is also essential that people dealing with serious and persistent mental illnesses and other vulnerable people retain subsidised access to health care and pharmaceuticals. Removing or restricting that access would potentially undermine the important recent gains in mental health treatment and recovery, which have been of real significance for many people who have experienced lifetimes of homelessness.

In terms of transitioning to the new system, in Homelessness Australia's view, there may be merit in considering an advertising campaign designed to reorient public perceptions of the purposes of the welfare system in the direction of its original or core objectives (ie supporting vulnerable people and those unable to support themselves and guarding against social exclusion, particularly of children), and to improve public understanding of related issues (eg levels of actual as opposed to perceived median wages, costs of living etc).

The base rate of income support must be structured in such a way that it does not increase the burden on specialist homelessness services (SHSs), which already struggle to meet demand on their present funding.

The Review Team has shown that the proportion of people on income support is considerably lower than in the past (Interim Report, Appendix G). Much of the so-called 'unsustainability' of federal welfare spending reflects projected uptake of the (part) Age Pension by people on relatively high incomes; meanwhile, the number of people who rely on the full Age Pension (those who are much less well off) is already in decline (Chart 7.1, 'Age Pension', National Commission of Audit, 2014). A single Age Pensioner may earn almost twice what a single person on Newstart may earn before losing his or her payment. Given this disparity, **it is essential that there be no further erosion of the lowest payments in the system. Homelessness Australia supports ACOSS's recommendations of immediate increases in the rates of single Newstart and Youth Allowance, student payments and FTB B for single parents**, as well as in the level of Rent Assistance, an issue discussed below.

The impact of inadequate income support payments on homelessness is apparent from the Australian Institute of Health and Welfare's Specialist Homelessness Collection (SHSC) data. Table S2.8 of the [2012-13 Annual Report](#) shows that, in that year, **more than 80 per cent of clients of homelessness services aged 15 and over were on some kind of government welfare or veterans' payment. A quarter of clients were on Newstart Allowance** (before many single parents were moved to that payment), **more than 18 per cent were on Disability Support Pension and almost 9 per cent were on Youth Allowance.**

Looked at the other way (see Table 1 below), **an estimated 8.4 per cent of all Parenting Payment Single recipients were SHS clients, as were more than 5 per cent of recipients of Newstart Allowance and Parenting Payment Partnered.** The proportions of Youth Allowance recipients assisted by SHSs appears smaller, but in fact about 4500 of those were unemployed non-students – equivalent to **4.2 per cent of the Youth Allowance (Other) recipient population** (then approx 106,000). **All of those proportions and numbers could be expected to increase if income support payments are further reduced in real value or withdrawn.**

These proportions take no account of whether or not clients received homelessness services (many people who seek accommodation cannot be provided with it, although they may receive other assistance), **or of numbers of other people whom SHSs turn away without providing them with any services at all.**

Table 1: Income support clients in SHSs at June 2013[§]

Payment type	Number of recipients at June 2013	Number of SHS client recipients 2012-13	SHS clients as a % of total payment recipients
Newstart	660,673*	34,384	5.2%
Youth Allowance	357,352~	11,818	3.3%
Parenting Payment Single	255,411#	At least 18,000** (est 21440)	At least 7 % (est 8.4%)
Parenting Payment Partnered	103497++	At least 5000** (est 5970)	At least 4.8% (est 5.8%)
Special Benefit	682*	Not enumerated	Unknown
Age Pension	2.3 million x 40% = 920,000	3394	0.4%
Disability Support Pension	821,738+	24,639	3 %
Carer payment	192,000##	1340	0.7%

§ These figures are for the period just before 63,000 PPS recipients were moved to Newstart Allowance (from 1 July 2013)

* Source: Department of Human Services *Annual Report 2012-13*, [ch 4](#).

~ Source: DEEWR [Working Age Payments by Commonwealth Electoral Division as at 27 September 2013](#) (June figures are not publicly available)

Source: National Commission of Audit, *Towards Responsible Government*, Appendix 3, 4.2 'Savings in other government areas'

+ Source: Department of Social Services, [Characteristics of Disability Support Pension Recipients, June 2013](#).

**Source: [AIHW SHS data cube 'other outcomes national'](#): main source of income for clients 15 and over and family type on first presentation, adjusted for non-response.

++ DEEWR [Payments by Commonwealth Electoral Division as at 28 June 2013](#).

Source: [Interim Report of the Reference Group on Welfare Reform to the Minister for Social Services](#) p 35.

Homelessness Australia strongly supports the Review team's proposals to **increase payments to single people to reflect their higher costs of living compared with couples. More than 70 per cent of people seeking assistance from a homelessness service in 2012-13 presented alone** – an increased proportion compared with the preceding year. It is particularly important for single people that the increased financial pressure caused by high housing costs does not cause them to become socially isolated, a circumstance which can exacerbate, or precipitate, mental illness of a kind that is more costly to both the individual and the taxpayer than more realistic levels of income support. For this reason, we support **ACOSS's recommendation that single payments be indexed at 66 per cent of the couple rate.**

Common approach to adjusting payments

While the purchasing power of the base rate of income support payments is the most important thing to keep up-to-date, it is desirable to link payments to parents to cover the costs of raising children, or to young people who cannot live at home, to community living standards to avoid the dangers of social exclusion. Social exclusion is associated with increased costs to the individual and government over the course of recipients' lifetimes. For this reason, Homelessness Australia supports ACOSS's recommendation that **payments be indexed to both wages and CPI. Indexation should be kept under regular review to ensure that it keeps pace with unanticipated developments** such as the 147 per cent increase in house prices over the decade to 2011, during which time median incomes rose by just 57 per cent, or the ensuing 76-92 per cent increase in rents over the decade to 2012 (AIHW, [Housing Assistance in Australia 2013](#) pp 7-8).

Support for families with children and young people

It is crucial that any model developed takes account of the fact that some young people, through no fault of their own, either do not have families or are unable to live with them, and that these young people face significant barriers accessing subsidies that might otherwise ameliorate their position such as the Relocation Allowance for students.

In 2012-13 about 500 children or young people (mainly older teenagers and, consistently with the gender split of the SHS client population, 57 per cent of them female) **who sought assistance from SHSs cited as their main reason for doing so either sexual abuse or care-leaving** (see Table 2 below). This is just the tip of the youth homelessness iceberg: in 2011, while acknowledging that it had not developed a robust method for counting youth homelessness, the ABS estimated that a phenomenal 88 persons per 10,000 in this age group were experiencing some kind of homelessness.

Table 2: SHS clients aged under 25 exiting care who cited care leaving or sexual abuse as main reason for seeking assistance, by age and sex, 2012-13

Main Reason	Male		Female		TOTAL
	Exiting foster care/ child safety	Sexual abuse	Exiting foster care/ child safety		
Age group					
0-9	28		39		67
10-14	15		17		31
15-17	80	4	92		176
18-19	81		106		187
20-24	12	2	23		36
	216	6	277		497*

Source: AIHW SHS data cubes 'demographics'. (Slight differences in totals reflect suppression of small cohorts.)

On our calculations (which seem to reflect those of the Review Team) a young person in this position who is not 'earning or learning' is entitled to about \$18,000 a year in Youth Allowance and Rent Assistance (at the maximum rate), plus \$1500 in TILA for expenses such as furniture or driving lessons. But **a young care leaver is likely to need much more investment than this to live independently**. By contrast, someone from an 'isolated' area who leaves a stable family home to pursue boarding school education is entitled to more than \$17,000 a year in AIC allowances without his or her family meeting the Youth Allowance (or any) parental means test, while his or her family remains simultaneously entitled to Family Tax Benefit if it can meet that payment's less stringent income test. **This is an inequitable outcome that needs to be addressed by increased investment in means-tested, affordable housing for young people. There has been recent investment in good housing models (eg Foyers) for young people who might otherwise struggle to access work or study, but there remains an urgent need for tailored housing support for young people at the point of care leaving, whatever their plans.** If Foyer-type developments are required to focus on 'earning or learning' alone, it is likely that hundreds of young care-leavers will remain the responsibility of specialist homelessness services.

Effective rent assistance

Reforms to demand-side measures such as Rent Assistance must take account of the purchasing power of that assistance not simply in terms of market rents, but also of housing quality and stability of tenure. As the Review Team points out - and [Anglicare's Rental Affordability Snapshots](#) consistently show - Rent Assistance is too low to allow income support recipients to secure housing of the kind typically advertised through real estate agents. **Rent Assistance may be enough, however, to secure its recipient a room or a bed in a registered boarding or rooming house – or worse, in a black market (unregistered and often overcrowded) one of the kind now commonly found in [Sydney](#) or [Melbourne](#) (see also [these news articles](#)).** According to the [2013 Independent Review of Centrepay](#), **more than 100 registered boarding or rooming house operators receive \$10 million in Centrepay deductions annually** (p 81). That Review found that 'laissez-faire commercial practices' adopted by Centrepay had 'harm[ed or]... resulted in sub-optimal outcomes for' Centrelink customers (p 3), and recommended that DHS 'establish special approval criteria, and subsequent compliance monitoring criteria, for the boarding and rooming house category of service provision within Centrepay'. **If the landlords of registered boarding houses are able to take advantage of Rent Assistance in this way, there are legitimate grounds for concern about exploitation of tenants who pay rent directly, particularly for accommodation in unregistered boarding houses.** Rent Assistance may not be the only public funds being misdirected in such situations: it is also possible that unregistered landlords benefit from income tax rental property deductions (an issue which [a 2009 Victorian Taskforce](#) recommended be investigated by the ATO). If the Commonwealth is to invest in lifting Rent Assistance, appropriate measures should be taken to ensure that it buys housing of an appropriate standard.

It may also be worth considering whether the secure income stream that Rent Assistance provides could leverage improved security of tenure for the right income support tenants from suitable private landlords by advancing their rent payments. A measure such as this could operate analogously with the Rent Assistance subsidy to community housing providers, and would be particularly suitable for families with children.

The government could seek advice on whether recent High Court decisions on s 99 of the Constitution permit it to pay rent assistance at different rates in different parts of Australia, based on their differential rental markets.

In the present housing market, **Rent Assistance may need to be made available to more low-income people.** Specialist Homelessness Services Collection data show that, in 2012-13, **almost 9500 clients of SHSs (two-thirds of them women) were employed** (AIHW SHSC Table S2.8, cited above), with the proportions of employed clients highest in jurisdictions (like the ACT, with 14.8 per cent – Table ACT 2.8) with above-average housing costs. As Table 3 below shows, more than 3000 extra people nominated either financial difficulty or housing affordability stress as their main reason for seeking assistance from a SHS in 2012-13 compared with the previous year:

Table 3: SHS clients by age and sex citing financial difficulties or housing affordability stress as their main reason for seeking assistance, 2011-12 and 2012-13

		2011-12					Total	2012-13					Total
Age group		0-17	18-24	25-44	45-55	55+		0-17	18-24	25-44	45-54	55+	
Males	Financial difficulties	1,759	1,638	6,169	2,401	1,526	13,614	1,748	1,779	6,490	2,719	1,684	14,567
	Housing affordability stress	828	617	1,200	527	394	3,598	891	613	1,363	570	551	4,019
Females	Financial difficulties	1,850	2,563	8,142	2,435	1,374	16,433	1,915	2,760	8,736	2,659	1,600	17,756
	Housing affordability stress	804	1,300	2,293	560	366	5,341	864	1,290	2,493	701	543	5,923
ALL CLIENTS financial or housing affordability		5,242	6,117	17,805	5,923	3,660	38,987	5,418	6,441	19,083	6,650	4,378	42,264

Source: AIHW SHS data cubes 'demographics'.

Homelessness Australia supports ACOSS's recommendation of an immediate 30% increase in Rent Assistance.

There is an equity case for extending Rent Assistance to low-income working singles as well as to families who receive full FTB A. **However, it would be better, and probably cheaper in the longer term, if governments instead focused on investing in increased supply of well-located affordable housing for low-income people in general**, as part of efforts to close the projected housing supply gap of 370,000-dwellings by 2016 (National Housing Supply Council, [Housing Supply and Affordability: Key Indicators 2012](#), p vi). **Even increased investment in housing for middle-income workers can assist low-income people** to secure private rental housing if it reduces competition from more affluent prospective tenants for lower-cost properties.

Homelessness Australia does not support the opening up of public housing to market rents under present conditions, in which demand exceeds supply by a factor of 200,000. About 10 per cent of the approximately 320,000 households in public housing already pay 'market' rents (see [Productivity Commission ROGS 2014](#), Tables 17A.4, 17A.5 and 17A.41). More importantly, **public housing is increasingly an accommodation option for people in the greatest need – about half of the households accommodated by it contain a person with a disability.** In 2011-12, more than 21,000 households (80 per cent in 'greatest need', including 13,000 because they had been homeless) received new tenancies, while nearly 50,000 more people in 'greatest need' joined waiting lists (ROGS 2014 Tables 17A.5 and 17A.13; AIHW, [Housing Assistance in Australia 2013](#), p viii.). Except perhaps in remote or some rural areas, **exposing these types of tenants to market pressures is likely to re-expose them to homelessness.** Improved allocation of existing public housing should continue to be pursued reducing under-utilisation and untenable stock and improving tenancy turnaround rates.

Rewards for work and targeting assistance to need

*Given the government's interest in the benefits of work, **there is a case for setting the amount that a person may earn before income support begins to taper (the 'free area') at a higher level (say \$5000 more) for income earned from work than for other types of income.***

As indicated above, it is also important to reduce disparities in the cut-off points for income support that favour higher-income earners.

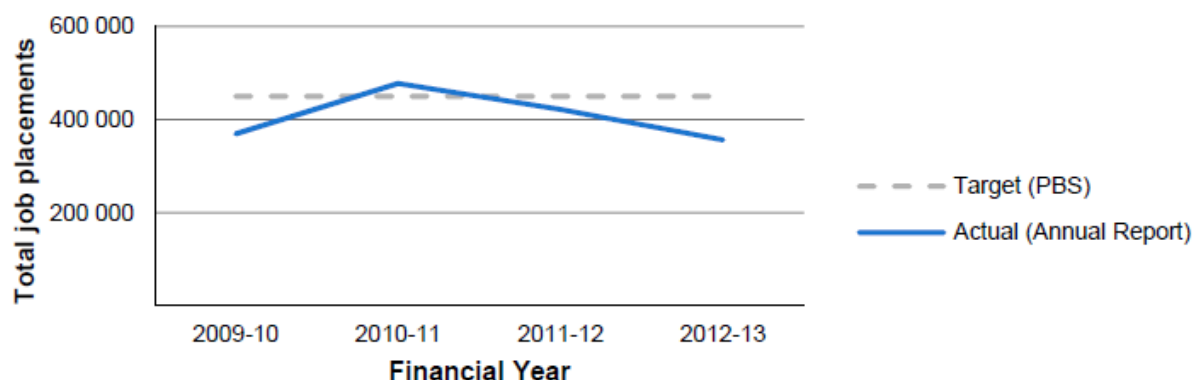
Pillar Two: Strengthening individual and family capability

Mutual obligation

Homelessness Australia supports the Review Team's suggestion of individually-tailored participation requirements covering a wide range of beneficial activities to 'up-skill' income support recipients, particularly hard-to-reach ones. There are many disadvantaged people for whom parenting, financial or other foundation skills training or engagement in longer-term planning will be far more beneficial than looking for jobs that do not exist in the present labour market. As the figure below from the recent Auditor-General's report on Job Services Australia (JSA) shows, JSA providers' ability to place income support recipients in work has been declining:

Figure 1: JSA total job placements achieved 2009-13 to 2012-13

(from ANAO, [Management of Services Delivered by Job Services Australia](#), Audit Report no 37, 2013-14, p 81)



Source: DEEWR, Portfolio Budget Statements and Annual Reports for 2009-10, 2010-11, 2011-12, 2012-13.

Every year, SHSs provide thousands of clients with assistance to develop living skills, parenting education, family and financial counselling and similar services, and refer thousands more to other providers for similar support (see AIHW, Table S2.15 Clients, by need for services and assistance and service provision status, [Specialist Homelessness Services Annual Report 2012-13](#)). **Our sector is interested in exploring ways in which that work could intersect with more flexible income support participation requirements for the benefit of clients, without placing additional strain on already overburdened SHSs.**

Homelessness Australia supports voluntary income management. A number of our member services are aware of its benefits for their clients' immediate financial stability, and therefore their housing security. Services with Aboriginal clients also appreciate its potential longer-term effectiveness in allowing clients (particularly women and older people) to fend off demands from relatives and associates to share resources which are otherwise difficult to resist for cultural reasons. The participation and matched savings incentives that come with income management could be of particular value for some of our sector's clients. However, **income management is not a substitute for the sort of education and empowerment of clients to manage their own finances that many SHSs, or services to which they refer clients, provide** (see AIHW's SHSC Table 2.15 referred to above). Indeed, as the Review Team's Interim Report seems to recognise, longer-term income management may risk disempowering clients financially (DSS, DCIPWA and DHS, [A Review of Child Protection Income Management in Western Australia, Final Report](#), February 2014), at least unless combined with other support measures.

While our sector is also interested in discussing how it can best support clients who choose to have their income managed by DHS, SHSs (particularly those that provide accommodation in exchange for rent) are not in a position to manage their clients' money for them, and need to take care to avoid conflicts of interest in influencing decisions to participate in income management. We are also aware that compulsory income management is effective than the voluntary form because unmotivated clients can always find ways around its constraints, eg by borrowing or lending Basics Cards, or pooling them with other financial resources and taking a

strategic approach to paying pooled bills. We also think that any wider roll-out of income management needs to take a realistic approach to the costs of living in new locations – there’s no point in trying to manage an income that simply won’t stretch to cover the full costs of living (particularly housing) in some Australian cities.

Early intervention

Homelessness Australia does not have a full understanding of the 2012 NZ welfare reforms. However, **we welcome any effort to reduce the lifetime costs of disadvantage to individuals, society and the taxpayer by investing ‘up front’ in ‘at risk’ children.** Recent cost-benefit research on homelessness has shown that considerable savings can result from intervening earlier to support even vulnerable adults (see Micah Projects, [Cost-Effective Housing First Interventions](#) and [Street to Home Nurses Lead the Way in Healthcare Cost Savings](#) Australian Housing and Urban Research Institute, [Homelessness support services bring benefits](#), 2014). We would like to see a global evaluation of the effectiveness of the NZ reforms before forming a view about the appropriateness of some of the sanctions that these impose.

The [2013 Marmot Report](#) on the EU reiterates something well-known in the Australian homelessness sector: that **the effectiveness of services targeted at vulnerable people is limited by the capacity of universal services to pay the same attention to their needs** as to those of other members of the population. In Australia, universal service providers still fail vulnerable children by designing services based on the presumption that they have a home – a place of shelter, safety, spaciousness, sanctuary, stability and supervision - in/to which services may be delivered, or which can provide a suitable springboard for children’s encounter with those services. It is of paramount importance that **early intervention strategies to maximise child development outcomes and promote positive parenting are flexible enough to be delivered to homeless children in places other than ‘homes’,** including SHSs if appropriate, or by other means.

According to Catholic Health Australia and NATSEM, 110,000 more low-income people could participate in the workforce if they enjoyed better health (The costs of inaction on the social determinants of health, 2012, available on www.socialdeterminants.org.au.) This may be an example of an area in which greater early attention by universal service providers can improve economic participation.

Homelessness Australia members have been extremely disappointed by termination of a federal program with strong credentials in supporting disadvantaged young people at risk of disengaging with school or training with targeted, flexible and individualised support: Youth Connections. A [January 2014 evaluation of the National Partnership on Youth Attainment and Transitions](#), which funded this Youth Connections, found:

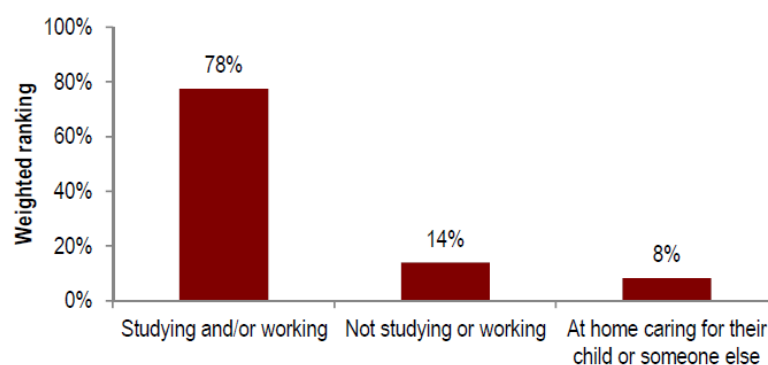
The Youth Connections program has consistently delivered positive outcomes for young people and is strongly supported by education and training, community and youth sector stakeholders. A strong feature of the program has been robust performance measurement and continuous refinement in response to assessments and feedback...

A study by the Brotherhood of St Laurence of [Youth Connections] services in Victoria provides an indication of the sustainability of the outcomes achieved through the program... Almost three-quarters (72.5 per cent) of young people in this region remained engaged with education at least three months after exiting the program...

...Services providers believe that one of the successes of Youth Connections is that it has created a focal point for interactions among [them] as a result of its networked and collaborative work practices, and reportedly galvanised the sector in a way that had not been anticipated... [T]he Youth Connections model encourages providers to work together. (see pp 66-77)

Youth Connections’ results for young people are apparent in the following figure from that evaluation:

FIGURE 3.14: MAJOR ACTIVITY OF MOST YOUNG PEOPLE SIX MONTHS AFTER LEAVING THE YOUTH CONNECTIONS PROGRAM



Source: dandolopartners survey of YC service providers (2012).

Pillar Three: Engaging with employers

Employment focus – making jobs available

*Improve access to finance for smaller developers to foster increased housing construction, and consider ways in which governments can assist such developers to manage risk (eg through joint ventures: see generally Rowley et al, *The financing of residential development in Australia*, AHURI February 2014). Subsidise high front-end costs of social enterprises in which people at risk of homelessness might easily participate (eg grease traps for cafes, insurance for pet-minding centres or schemes).*

It may also be useful to investigate the relationship between young people's casual or part-time employment and employers' obligation to make superannuation contributions on their behalf.

Improving pathways to employment

Two projects that might offer models of how to integrate employment support and housing assistance are:

[Project New Dawn](#), established in 2007 as a grass roots project. With the support of Mission Australia, Project New Dawn has helped homeless people around Australia get back on their feet and re-engage with mainstream society. Project New Dawn provides employment and housing assistance to people who are homeless or at risk of being homeless, regardless of race, gender or religious background. Suitable candidates must be job ready, without a track record of major or violent crimes and free from any drug or alcohol abuse.

Project New Dawn works in conjunction with employment partners (currently Bunnings and BP) to prepare participants for ongoing employment and provide a minimum of 30 hours employment per week. The employment partners provide training and a supportive work environment, and are involved in maintaining stable living arrangements.

Participants are enrolled in the program for between 12 and 18 months, during which time they pay their rent, utilities and living expenses. Participants live in a shared house with two other program participants and a lead tenant who provides ongoing emotional, social and financial guidance and advice over the course of the program. Further support is provided by a Mission Australia caseworker who meets with the lead tenant and the three participants weekly to monitor the living and work arrangements and the well-being of participants. The houses they live in are furnished by Radio Rentals who provide beds and whitegoods, everything that makes a home more liveable.

Along with ongoing stable employment, this commitment helps participants to establish a savings and rental history, and establish good habits for after the program. After 12 to 18 months or when the participants are ready, they graduate from the program.

Home Options and Pathways to Employment Project – a project initiated by Homelessness Australia and the National Employment Services Association (NESA)

The aim of the HOPE project was to facilitate effective linkages between Job Services Australia providers and homelessness support services which has strengthened their capacity to collaboratively ensure that homeless people receive appropriate and targeted services which will enable them to progress to employment and offer pathways from poverty and homelessness.

In 2009, NESA and Homelessness Australia worked together to develop the HOPE project, which developed materials to support better interaction between employment and homelessness services.

Among other outcomes, the project:

- Increased knowledge and understanding levels in both sectors with regard to improving employment assistance for people who are homeless and created linkages which enabled a more integrated approach to supporting those experiencing, or at risk of homelessness to progress towards employment
- Developed best practise guidelines which included essential principles for effective collaboration
- Developed a service associated learning package for specialist homelessness service providers.

HA and NESA have jointly applied for DSS grant funding to facilitate a Phase 2 of the HOPE project which aims to build on and expand this work by identifying and promulgating current best practice models of employment and homelessness services working together to enhance existing policies and programmes. It will also expand the scope of the original previous project to include Disability Employment Services and particular cohorts such as young people, and bring the resources up to date given that a new model of employment services is expected after current Job Services Australia contracts end on 30 June 2015.

Pillar Four: Building community capacity

Access to technology

- How can disadvantaged job seekers' access to information and communication technology be improved?

BY IMPROVING THEIR CONTINUITY OF CONNECTION – SEE THE STUDY BY DR JUSTINE HUMPHRY RELEASED IN AUGUST 2014.