

Retirement Income Review Secretariat
The Treasury
Langton Crescent PARKES ACT 2600
By email: retirementincomereview@treasury.gov.au
Date: 3 February 2020

Submission on the Retirement income review

Thank you for the opportunity to make a submission on the retirement income review run by the Treasury.

About Australian Women Against Violence Alliance

Australian Women Against Violence Alliance (AWAVA) is one of the six National Women’s Alliances funded by the Australian Government to bring together women’s organisations and individuals across Australia to share information, identify issues and contribute to solutions. AWAVA’s focus is on responding to and preventing violence against women and their children. AWAVA’s role is to ensure that women’s voices and particularly marginalised women’s voices are heard by Government, and to amplify the work of its member organisations and Friends and Supporters. AWAVA’s members include organisations from every State and Territory in Australia, representing domestic and family violence services, sexual assault services, services for women in the sex industry and women’s legal services, as well as organisations representing Aboriginal and Torres Strait Islander women, young women, women educators and other groups. AWAVA’s contract manager is the Women’s Services Network (WESNET).

List of used acronyms

ACOSS	Australian Council for Social Services
ASFA	The Association of Superannuation Funds of Australia Limited
AWAVA	Australian Women Against Violence Alliance
CALD	People from culturally and linguistically diverse backgrounds
LGBTIQ+	People who are lesbian, gay, bisexual, transgender, intersex and queer

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Introduction

Around half of older Australians aged 65 and over are women.¹ 1 in 6 of all homeless people on Census night were aged 55 or over.² The number of older women who are homeless in Australia has increased by 31% since 2011³ due to increasing economic insecurity, gender pay and superannuation gaps and the impacts of domestic and family violence. Increasingly women are retiring with much less savings or superannuation, yet social policy remains gender-blind to these issues.

We are disappointed that the consultation paper itself does not properly address gender disparity in economic security more broadly and retirement income specifically. Omission of the impacts of domestic and family violence is a big gap in the discussion about women's ability to live secure and dignified lives in the retirement. In this submission we wish to draw the attention to the structural barriers that impact diverse groups of women to establish their financial independence and stability, impacts of feminisation of poverty and impacts of domestic and family violence. We argue that without embedding an intersectional gender lens in social policy, equitable outcomes for women in their diversity will not be achieved.

In this submission we are seeking to address questions 13 (What should the Panel consider when assessing the equity of the retirement income system?) and 14 (What factors and information should the Panel consider when examining whether the retirement income system is delivering fair outcomes in retirement? What evidence is available to assess whether the current settings of the retirement income system support fair outcomes in retirement for individuals with different characteristics and/or in different circumstances (e.g. women, renters, etc.)?)

Structural issues impeding women's financial security during the course of life

Feminisation of poverty

Current rates of poverty for people in Australia are \$433 a week for a single adult (calculated as 50% of median income before housing costs and \$909 a week for a couple with two children).⁴ Poverty is a gendered phenomenon whereby women are more likely to live in "households below the poverty line than men (13.4% as against 13.0% for men based on the 50% poverty line)"⁵. At an individual level the disparity is likely to be greater, with women aged 25–44 more than two and a half times more likely than men of the same age to be out of the labour force.⁶

The rates of poverty for people with disability is estimated by various report to be between 17% and 34%⁷ with some reports showing that 45% of people with disability experience poverty.⁸

ACOSS drawing on a study by Markham & Biddle⁹ estimates that the poverty rate for Aboriginal and Torres Strait Islander people is 31%, while poverty is twice as high in very remote communities (54%) as in major

¹ Australian Institute of Health and Welfare 2018. Older Australia at a glance. Cat. no. AGE 87. Canberra: AIHW. Viewed 22 January 2020, <https://www.aihw.gov.au/reports/older-people/older-australia-at-a-glance>

² Ibid.

³ National Older Women's Housing and Homelessness Working Group. 2018. Retiring into Poverty - A National Plan for Change: Increasing housing security for older women. ACT: YWCA Canberra; Australian Human Rights Commission 2019. Older Women's Risk of Homelessness: Background Paper 2019 ISBN: 978-1-925917-01-7 <https://www.humanrights.gov.au/our-work/age-discrimination/publications/older-womens-risk-homelessness-background-paper-2019>

⁴ Good Shepard Australia and New Zealand FACT SHEET How does poverty impact women in Australia? https://www.goodshep.org.au/media/2168/poverty-in-australia-2018-report_fact-sheet_finaldocx.pdf

⁵ Ibid.

⁶ 4125.0 - Gender Indicators, Australia, Sep 2017

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

⁸ Price Waterhouse Coopers (PWC) (2011) Disability expectations: Investing in a better life, a stronger Australia

⁹ Markham F & Biddle N (2018): Income, poverty and inequality - Census Paper 2, Centre for Aboriginal Economic Policy Research, Australian National University, Canberra

cities (24%).¹⁰ ACOSS also notes that the complexity of family structures most likely result in the severe under-reporting of poverty rates among Aboriginal and Torres Strait Islander peoples. The ABS Survey of Income and Housing does not disaggregate their data on poverty rates by Indigenous status.

Globally people who identify as LGBTIQ+ are 7% less likely to be employed than those who do not identify as LGBTIQ+. Their earnings are on average 4% lower and they are 11% less likely to hold a managerial position.¹¹ Council of Social Service of NSW in their 2015 report reveals that LGBTIQ+ people are experiencing higher levels of disadvantage than other Australians, putting them at greater risk of falling into poverty. The disadvantage is often marked by spells of unemployment, workplace discrimination and pay gaps, in spite of evidence of higher levels of education. This means they are more likely to experience a reduced asset-base to draw on later in life, lower levels of superannuation, poor self-reported health status, barriers to accessing some forms of healthcare (including primary care) and, in some cases, to experience homelessness during their lives.¹²

Of all Australians living in poverty, 18.6% were born in Australia, and 26.9% of those living in poverty were born outside of Australia from non-English speaking countries.¹³

Women's higher rates of poverty result from poorer employment opportunities, women's over-representation in lower level positions, the gendered pay gap, women's increased likelihood of performing unpaid caring roles and as a result women's lower financial security in retirement.¹⁴

Women more than men are engaged in unpaid domestic work. Mothers spend on average twice as many hours (8 hours and 33 minutes) each week looking after children aged under 15, compared to fathers (3 hours and 55 minutes)¹⁵. Furthermore, Australian women account for 92 per cent of primary carers for children with disabilities, 70 per cent of primary carers for parents and 52 per cent of primary carers for partners.¹⁶ The traditional division of labour means that women and men are more likely to work in certain industries and that female dominated industries generally provide lower salaries than male dominated industries.¹⁷

Employment opportunities and workforce participation are limited for some groups due to structural issues, racism and homophobia, ongoing impacts of colonisation and gender bias. For Aboriginal and Torres Strait Islander people workforce participation sits at 52 per cent, where men are more likely than women to be employed (55% compared with 49%).¹⁸ For Aboriginal and Torres Strait Islander women lower employment rates, casualisation of employment, higher poverty rates and higher child removal rates, ongoing impact of colonisation, lower life expectancy and chronic illnesses and disability impede their economic security. Aboriginal and Torres Strait Islander women are "more likely to be a sole parent, have a higher birth rate, larger families and women generally are more likely to make major changes to their work life to accommodate these responsibilities."¹⁹ This means that they will need to care not only for their

¹⁰ Davidson, P., Saunders, P., Bradbury, B. and Wong, M. (2018), Poverty in Australia, 2018. ACOSS/UNSW Poverty and Inequality Partnership Report No. 2, Sydney: ACOSS.

¹¹ The Organisation for Economic Co-operation and Development <https://www.oecd.org/els/soc/lgbti.htm>

¹² NSW Council of Social Service (2015) Beyond the myth of 'pink privilege': Poverty, disadvantage and LGBTI people in NSW https://www.ncoss.org.au/sites/default/files/public/policy/LGBTIPovertyNCOSSLaunch_FINAL.pdf

¹³ ACOSS, Poverty in Australia (2018) https://www.acoss.org.au/wpcontent/uploads/2018/10/ACOSS_Poverty-in-Australia-Report_Web-Final.pdf

¹⁴ Australian Council of Social Service (2014) *Poverty in Australia: 2014*, p. 17, Available at http://www.acoss.org.au/images/uploads/ACOSS_Poverty_in_Australia_2014.pdf

¹⁵ Australian Bureau of Statistics, 4125.0 - Gender Indicators, Australia, Jan 2012: Caring for Children (February 2012).

¹⁶ Australian Bureau of Statistics, 4153.0-How Australians Use Their Time, 2006 (February 2008).

¹⁷ Workplace Gender Equality Agency (2015) *Gender Pay Gap Statistics*, Available at https://www.wgea.gov.au/sites/default/files/Gender_Pay_Gap_Factsheet.pdf

¹⁸ <https://www.abs.gov.au/AUSSTATS/Abs@.Nsf/7d12b0f6763c78caca257061001cc588/5f17e6c26744e1d1ca25823800728282!OpenDocument>

¹⁹ National Aboriginal and Torres Strait Islander Women's Alliance (2015) submission to the Senate Standing Committee on Economics enquiry on economic security for women in retirement. Aboriginal and Torres Strait Islander Women and Superannuation.

children but elders too. In the long-term they will accrue much less superannuation. It is worth noting in addition that there is no data available on superannuation balances for Aboriginal and Torres Strait Islander people as it is not being collected.

Women from culturally and linguistically diverse backgrounds also retire with less superannuation. Women from culturally and linguistically diverse backgrounds may not have access to the full benefits of superannuation because they are mostly in casual and precarious work, and are often in and out of work due to family responsibilities and/or lack of available jobs. Overall, people from culturally and linguistically diverse background face additional barriers in securing employment compared to people with local work experience. There are also barriers with the recognition of qualifications and previous employment. An inquiry by the Federation of Ethnic Communities Council into insecure employment has found that women from culturally and linguistically diverse backgrounds are over-represented in insecure employment fields leaving them more likely to experience job loss and hardship.²⁰ Women who are on temporary visas and are experiencing violence may not have any superannuation savings at all given the restrictions on work rights, the nature of their visas or simply their lack of employment.

Limited available data shows that people with disability in Australia are twice likely to be unemployed (10.0%) than those without disability and face longer periods.²¹ Women with disability in Australia experiences much disadvantage “in employment in relation to access to jobs, in regard to remuneration for the work they perform, and in the types of jobs they gain”.²² In employment women with disability are subjected to higher rates of sexual harassment, violence, abuse and discrimination in the workplace than women without disability.²³

Gender pay and superannuation gaps

All of these structural issues result in a gender pay gap that later in life will also result in a superannuation gap and less savings in retirement. The current full-time gender pay gap is 14%, meaning that women on average are earning \$241.50 less a week than men.²⁴ Gender pay gap is a result of bias and discriminatory practices in employment (that is often compounded by bias related to people’s race, sexual orientation, migration status etc), women’s disproportionate share of domestic and unpaid care work (as discussed above), lack of opportunities for flexible workplace arrangements especially in senior roles, and longer time out of the workforce, which impacts on career progression and opportunities.

The gender pay gap leads to women in Australia retiring today with 47 per cent less superannuation than men²⁵ As a result, women are more likely to experience poverty in their retirement years and be far more

²⁰ Submission to Independent Inquiry into Insecure Work’, (ACT: FECCA). Available at http://fecca.org.au/wp-content/uploads/2017/07/Independent-Inquiry-into-Insecure-Worksubmissionv_02.pdf

²¹ See: Australian Bureau of Statistics, Disability, Ageing and Carers, Australia: First Results, 2015 (Cat. No. 4430.0.10.001); People with disability were significantly more likely to still be looking for a job 13 weeks or longer after they first started (65.5%) compared with those without disability (56.1%), Australian Bureau of Statistics, Disability and Labour Force Participation, 2012 (2015); See also: Price Waterhouse Coopers (2011) Disability Expectations: Investing in a better life, a stronger Australia. See also: Australian Institute of Health and Welfare 2017. Australia’s welfare 2017. Australia’s welfare series no. 13. AUS 214. Canberra: AIHW. See: Australian Human Rights Commission (2016) Willing to Work: National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability, AHRC, Sydney.

²² Joint Position Paper from Disabled People’s Organisations Australia (DPO Australia) and the National Women’s Alliances (2019) The Status of Women and Girls with Disability in Australia. Position paper to the Commission on the Status of Women (CSW) Twenty Fifth Anniversary of the Fourth World’s Conference on Women and the Beijing Declaration and Platform for Action (1995).

²³ Women with Disabilities Australia (WWDA), (2014) ‘Gender Blind, Gender Neutral’: The effectiveness of the National Disability Strategy in improving the lives of women and girls with disabilities. WWDA, Hobart, Tasmania, ISBN: 978-0-9585268-2-1.

²⁴ Workplace Gender Equality Agency <https://www.wgea.gov.au/data/fact-sheets/australias-gender-pay-gap-statistics>

²⁵ Australian Institute of Superannuation Trustees, Women in Super (2016) Women’s Super Summit 2016

reliant on the Age Pension.²⁶ In 2012, 38.7% of elderly single women compared to 33.8% of elderly single men were living in poverty²⁷.

ASFA reports that in 2015-16 there were 32.7 per cent of women with no superannuation.²⁸ They also report that the percentage of men with more than \$100,000 in superannuation increased from 21.5 per cent two years earlier to 25.8 per cent, while for women the percentage increased from 12.8 per cent to 16.4 per cent.²⁹

Impact of domestic and family violence and cost of leaving partners who are use violence

It is widely recognised that family, domestic and sexual violence is an endemic problem in Australian society.³⁰ Australian Institute of Health and Welfare reports that:

- One in 6 (17%, or 1.6 million) women have experienced physical and/or sexual violence by a current or previous cohabiting partner since the age of 15;
- Almost 1 in 4 (23%, or 2.2 million) women have experienced emotional abuse by a current or previous partner since the age of 15;
- Almost 1 in 5 (18%, or 1.7 million) women have experienced sexual violence since the age of 15.³¹

Australian police deal with 5,000 family violence matters on average every week, which averages to one matter every two minutes.³² It has been recognised that family violence is a gendered crime with the vast majority of family violence perpetrated against women, usually by a man.³³

Almost eight women were hospitalised each day after being assaulted by their spouse or partner in 2014-2015 which amounts to 2800 women in total. 72,000 women, 34,000 children and 9,000 men sought homelessness services in 2016-17 due to family/domestic violence.³⁴

The impact of domestic and family violence is severe, long-lasting and impacting on economic security for women. This includes, but not limited to the following:

1. Worsened health outcomes:

- Intimate partner violence is the leading contributor to death, disability illness and injury among women aged 18 to 44.³⁵

²⁶ R Tanton, Y Vidyattama, J McNamara, Q Ngu Vu & A Harding, *Old Single and Poor: Using Microsimulation and Microdata to Analyse Poverty and the Impact of Policy Change Among Older Australians* (2008) p 15.

²⁷ Wilkins, R (2015), *The Household, Income and Labour Dynamics in Australia Survey: Selected findings from Waves 1-12*.

Melbourne Institute of Applied Economic and Social Research, viewed 21 September 2016, available:

https://www.melbourneinstitute.com/downloads/hilda/Stat_Report/statreport_2015.pdf

²⁸ The Association of Superannuation Funds of Australia Limited (2017) *Superannuation accounts balances by age and gender*.

²⁹ Ibid.

³⁰ Australian Institute of Health and Welfare 2018. *Family, domestic and sexual violence in Australia 2018*. Cat. no. FDV 2.

Canberra: AIHW; ABS 2017b. *Personal Safety Survey 2016*. ABS cat. no. 4906.0. Canberra: ABS; Bryant & Bricknell 2017. *Homicide in Australia 2012-13 to 2013-14: National Homicide Monitoring Program Report*. Canberra: AIC;

<https://anrows.org.au/resources/media/media-releases/intimate-partner-violence-contributes-highest-health-risk-women-aged>;

<https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-2016-17/contents/clients-services-and-outcomes>

³¹ Australian Institute of Health and Welfare 2018. *Family, domestic and sexual violence in Australia 2018*.

Cat. no. FDV 2. Canberra: AIHW.

³² Clare Blumer, 'Australian police deal with domestic violence every two minutes' ABC News 21 April 2016

<http://www.abc.net.au/news/2016-04-21/domestic-violence/7341716>

³³ See eg ABS, *Crime victimisation, Australia, 2012-13* cat no 4530.0 December 2014

<http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/4530.0main+features100022012-13>

³⁴ Australian Institute of Health and Welfare 2018. *Family, domestic and sexual violence in Australia 2018*.

Cat. no. FDV 2. Canberra: AIHW.

³⁵ <http://media.aomx.com/anrows.org.au/s3fs-public/28%2010%2016%20BOD%20Compass.pdf>

- Mental health conditions were the largest contributor to the burden due to physical/sexual intimate partner violence, with anxiety disorders making up the greatest proportion (35%), followed by depressive disorders (32%).³⁶
- Other diseases linked to physical/sexual intimate partner violence are early pregnancy loss, homicide and violence, suicide and self-inflicted injuries, pre-term and low birth weight, and alcohol use disorders.
- A consequent need to attend a range of medical and counselling appointments increases the costs.

2. A need to **navigate multiple legal systems** that not only result in loss of time but also incur high fees:

- A victim/survivor may be simultaneously navigating seven different legal processes. This includes: “(1) Children and property matters in the Federal Circuit Court, as well as, urgent interim applications in relation to the same proceedings; (2) Divorce proceedings in the Federal Circuit Court or Family Court; (3) Intervention order proceedings in the Magistrates Court; (4) Criminal proceedings; (5) Victim of Crime assistance proceedings; and (6) Debt issues that require resolution through the relevant agencies;”³⁷ and (7) Migration matters, for example applying for family violence provisions to secure permanent residency after relationships breakdown.

3. Homelessness

- Domestic and family violence is the single largest reason for people to seek homelessness services.³⁸
- More female people than male people presented to agencies homeless in 2017–18; the number of female people presenting homeless in 2017–18 (57,000) has overtaken the number of male people (52,100), up from 41,900 for female people and 41,100 for male people in 2013–14.³⁹
- Homelessness may also increase risk of gender-based violence in particular sexual violence. In addition, when intertwined with poverty and lack of social security support, many women are forced to engage in survival sex to obtain any accommodation or general ‘protection’.
- A general lack of affordable housing and social and public housing may push women to stay with a violent partner. In addition, in most states of Australia only Australian citizens and permanent residents are able to access social and public housing, further excluding women who are on temporary visas and are experiencing domestic and family violence.
- Available government programs designed to support women to stay in their homes post separation are not able to support all women in this need. For example, in NSW there are capped amounts of places that can be supported given the requirement of case management.⁴⁰

4. Economic cost

³⁶ Julie Ayre, Miriam Lum On, Kim Webster, Michelle Gourley and Lynelle Moon (2016) Examination of the burden of disease of intimate partner violence against women in 2011: Final report, Sydney: ANROWS <https://dh2wpaq0gtxwe.cloudfront.net/s3fs-public/BoD%20Horizons.pdf>

³⁷ Australian Council of Trade Unions submission on the Family and Domestic Violence Leave to the Fair Work Commission. <https://www.actu.org.au/media/886617/actu-submission-to-fwc-family-and-domestic-violence-leave.pdf>

³⁸ Australian Institute of Health and Welfare 2015, Specialist Homelessness Services 2014-15: Clients, Services and Outcomes, Australian Government, Canberra <http://www.aihw.gov.au/homelessness/specialist-homelessness-services-2014-15/clients-services-outcomes/>

³⁹ Australian Institute of Health and Welfare (2018) Specialist Homelessness Services Annual Report 2017-2018 <https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-2017-18/contents/clients-services-and-outcomes>

⁴⁰ NSW Government, Program Guidelines for Staying Home Leaving Violence Program.

- Price Waterhouse Coopers has estimated that violence against women in Australia imposes a financial cost of \$21.7 billion a year, with victims/survivors bearing the main burden of this cost.⁴¹ If appropriate action is not taken, this toll could rise to \$323.4 billion by 2045.
- It costs around \$18000 for a victim/survivor to leave violent relationship and establish safety. This would include costs associated with reallocation, safety upgrades, legal costs and medical costs.⁴²
- It takes an average of six years for women to recover financially from a divorce.⁴³
- Separation for victim/survivors of domestic and family violence results in significantly reduced assets.⁴⁴
- Perpetrators of domestic and family violence leave victim/survivors responsible for repaying jointly accumulated debts.⁴⁵
- Economic abuse is often used among other tactics of control and coercion by perpetrators of domestic and family violence.⁴⁶

It is disappointing that the current review did not engage with the impacts of domestic and family violence on retirement savings and superannuation given the prevalence of violence against women. We also note that AWAVA opposed proposals⁴⁷ (now passed and finalised) for an early release of superannuation benefits in situations of domestic and family violence. Such proposals appeared to shift the onus of rebuilding one's life after family violence onto the victim/survivor. This reinforces outdated stereotypes about family violence being a private issue rather than being a government responsibility to ensure the safety of all women in Australia. Instead, victims/survivors should have access to publicly-funded payments specifically targeted to assisting with recovery from domestic and family violence, as in the model of the Victorian Flexible Support Packages.

We wish to stress that alongside measures to improve women's economic security, especially after having experienced family violence, a better investment in specialist women's services is required to ensure their capacity to meet increasing service demand.

Embed an intersectional gender lens into social policy

In the section above we have highlighted the importance to embed an intersectional gender lens to social policy as it indicates how multiple and intersecting factors may place diverse women into disadvantaged conditions.

Applying gender and intersectional lenses to social security policy makes it clear how an intersection of gender with other identities (such as race, sexual orientation, disability, migration status etc) and other systemic forms of oppression (such as racism, homophobia, ableism etc) exacerbates economic disempowerment, excludes people from and limits their employment opportunities. Having elucidated

⁴¹ PWC (2015) Economic case for preventing violence against women. A high price to pay. <https://www.pwc.com.au/pdf/a-high-price-to-pay.pdf>

⁴² Australian Council of Trade Unions submission on the Family and Domestic Violence Leave to the Fair Work Commission. <https://www.actu.org.au/media/886617/actu-submission-to-fwc-family-and-domestic-violence-leave.pdf>

⁴³ De Vaus, D., Gray, M., & Stanton, D. (2014). The Economic Consequences of Divorce in Australia. *International Journal of Law, Policy and Family* 28(1), 26-47.

⁴⁴ Braff, R. & Myering, I. B. (2011). Seeking security: Promoting women's economic wellbeing following domestic violence. Department of Families, housing, Community services and Indigenous Affairs, University of New South Wales. Australian Domestic and Family Violence Clearinghouse.

⁴⁵ Corrie, T. & McGuire, M. (2013). Economic abuse: Searching for solutions. A Spotlight on Economic Abuse research report. Collingwood: Good Shepherd Youth & Family Service. Retrieved from https://www.goodshep.org.au/media/1223/economic-abuse_final-report.pdf

⁴⁶ Good Shepherd Australia and New Zealand (2016) Economic Security for Survivors of Domestic and Family Violence.

⁴⁷ The Treasury, Australian Government (2018) Review of Early Release of Superannuation Benefits. Further consultations and draft proposals.

those connections, government will be better enabled to take active steps to ensure just and fair outcomes for all.⁴⁸

Recommendations

We recommend that the Australian Government take the following steps:

1. Apply an intersectional gender lens to this review of retirement income to ensure equitable outcomes for women in all their diversity.
2. Take active steps to eliminate gender pay gap.
3. Pursue agreement through COAG that all States and Territories will implement flexible financial support programs for victims/survivors along the lines of the Victorian model.
4. Ensure access to affordable and accessible childcare.
5. Incentivise employers to pay the superannuation guarantee on parental leave.
6. Abolish the \$450-a-month threshold for superannuation guarantee.⁴⁹
7. Increase the superannuation guarantee from 9.5 percent to 12 percent.

We thank you for the opportunity to provide input to this consultation. If you would like to discuss the contents of the submission further, please contact Dr Merrindahl Andrew, AWAVA Program Manager, using the details below.

Dr Merrindahl Andrew

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⁴⁸ Equality Rights Alliance, Australian Women Against Violence Alliance, 'Unpacking the Women's Economic Security Statement', 21 January 2019, available at <http://www.equalityrightsalliance.org.au/unpacking-the-womens-economic-security-statement/> (Accessed 8 August 2019).

⁴⁹ ASFA estimates that around 365,000 individuals (220,000 women and 145,000 men) would benefit from the removal of the threshold through higher retirement savings.