



Submission to the ATO Vulnerability  
Framework Consultation |

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## **Preamble**

### **The National Rural Women's Coalition**

The National Rural Women's Coalition (the NRWC) is a grass roots organisation, established in 2002, that works to support and grow vibrant rural, remote, and regional communities through women's participation and leadership throughout Australia. The NRWC works to influence policy makers and stakeholders to make RRR Australia ensure a gendered rural lens is applied to create a more equitable society that benefits all. We are a coalition of five peak rural alliances - the Australian Local Government Women's Association, Australian Women in Agriculture, National Rural Health Alliance, Women in Seafood Australasia and Transport Women Australia Limited.

For over twenty years, we have worked to ensure better social, economic, and environmental outcomes for women in rural townships, in rural communities and in primary production throughout Australia.

The NRWC provides a collaborative, powerful national voice for women living in Rural, remote, and regional Australia through:

- Representing the diverse views and voices of women in rural, remote, and regional Australia;
- Providing advice to the Australian Government on policy issues relevant to the views, circumstances and needs of rural women; and
- Contributing to building a positive profile of rural women, their achievements, and

their issues.

We believe it is important that the unique views of rural women in all their diversity who reside in the numerous rural, remote, and regional communities throughout Australia as farmers, businesswomen, community leaders and volunteers, have substantial input into consultations about their communities, industries, needs and issues, including any matters relating to women's rights, gender equality and discrimination.

## **Background**

The Australian Taxation office is undertaking a consultation on its ATO Vulnerability Framework with the following goals

- understand different experiences and perspectives, including lived experience
- identify any gaps or unclear areas
- build trust by ensuring transparency and community input
- strengthen the clarity, relevance and accessibility of the Framework

The Framework is part of the ATO charter <https://www.ato.gov.au/about-ato/commitments-and-reporting/ato-charter> and outlines six guiding principles and four core areas on their approach on how to engage with community. Within this is the definition of vulnerability and it is to this definition the National Rural Women's Coalition has targeted its response to the consultation request.

We welcome the opportunity to comment on the draft ATO Vulnerability Framework and commend the ATO's efforts to articulate its role in supporting Australians experiencing vulnerability.

We strongly support the Framework's intent and principles, particularly the focus on empathy, inclusion, and fairness. However, we urge the ATO to strengthen recognition of the unique circumstances that contribute to vulnerability in rural and regional Australia, particularly for people and businesses engaged in agriculture.

### **Consultation Questions and Response**

**Q3:** How well does the Framework explain what vulnerability means and how it may affect people's experience with the ATO? Do you think the definition of vulnerability is clear and inclusive? What, if anything, should be added or clarified?

Response:

#### **Definition of vulnerability**

The Framework currently outlines several factors that may cause or compound vulnerability, such as financial distress, or mental health. We recommend the definition of vulnerability be expanded to explicitly include environmental conditions and the impacts of adverse climatic events, such as bushfires, floods, and prolonged drought, as a root cause of vulnerability; especially to citizens located in rural and regional areas of Australia. These events are not just isolated emergencies but increasingly frequent, compounding shocks that create persistent hardship in farming communities.

The Australian Government has acknowledged the intensifying impacts of climate change and has committed to supporting communities to adapt and build resilience through the

National Climate Resilience & Adaptation Strategy. It is vital that this recognition be integrated into the ATO's Framework, aligning with broader government policy and responding to the increasing exposure and risk faced by rural people due to environmental volatility now and into the future.

It is important to understand the extended period of time recovery may take after an environmental disaster or prolonged drought, that vulnerability may last well after the event has passed.

Further, we wish to see the Framework and the definition recognise that rural and regional people and their communities are at higher risk of vulnerability in comparison to their city counterparts.

**Q6:** Is there anything missing that would make the Framework more useful or complete?

**Response:**

**Supporting people with vulnerability**

We also recommend that the ATO enhance its customer care model by ensuring that vulnerable agricultural customers are supported by staff who have knowledge and understanding of the agricultural sector. This capability is critical to delivering respectful, empathetic, and context-aware support; especially when engaging with individuals and businesses affected by trauma or long-term hardship as caused by drought and natural disasters.

Staff who can recognise seasonal cashflow cycles, the impacts of livestock loss, or the recovery timelines after drought or bushfire are better equipped to support customers with

dignity and fairness. This approach would demonstrate the ATO's commitment to truly understanding and responding to the circumstances of all Australians.

We support the Framework's guiding principles and see the potential for it to positively influence how the ATO supports people in need. Strengthening its relevance to rural, regional and agricultural communities and explicitly addressing climate-related vulnerability will enhance its impact and alignment with broader government priorities. We would welcome the opportunity to work with the ATO in continuing to build fair, inclusive systems for rural Australians and the agricultural sector.