



The Australian Taxation Office

Via Email: RedefiningConcessionsProject@ato.gov.au

02.10.2025

The ATO's Approach to Taxpayer Relief Provisions

Dear Australian Taxation Office,

Working with Women Alliance (WwWA) is grateful for the opportunity to consult on the ATO's draft principles that will underpin the provisions of taxpayer relief.

WwWA supports the ATO in updating their approach to administering taxpayer relief. Our contribution to this consultation is grounded in our work in the space of domestic and family violence and economic equality. In particular, we offer a lens on how experiences of violence and financial abuse impact a taxpayer's ability to engage with the ATO.

This letter suggests alterations to the ATO's draft principles to ensure they are impactful for all taxpayers experiencing tax hardship, especially those experiencing violence.

Financial Abuse Oversight

The tax system is being used to perpetrate financial abuse, yet the draft principles largely fail to acknowledge financial abuse as a risk factor for vulnerability.

We note earlier reports from the Tax Ombudsman and the Parliamentary Inquiry into *Financial Services Regulatory Framework in Relation to Financial Abuse* that draw attention to the weaponisation of tax obligations. In particular, the Ombudsman's report has recommended the ATO investigate avenues of debt-relief within existing legislation and recommended that the ATO provide advice to consumers at risk regarding how to delay or pause debt burdens that result from financial abuse.

It is vital that these intentions are written into the principles for administering taxpayer relief, and that staff within the ATO are aware of the dynamics of financial abuse and systems weaponisation.



We urge the ATO to consider specific exemptions for women experiencing tax hardship due to experiences of violence which may include physical violence, coercion, or financial abuse that limits their ability to engage with the ATO and comply with tax obligations. For instance,

- An exemption from providing proof of effort to lodge and pay on time (Principle 2).
- Understanding that experiences of violence may lead an individual to need multiple concessions on more than one occasion (Principle 3).
- Understanding that women experiencing violence may be distrusting of government systems.
 - Women may not 'proactively engage,' 'willingly comply' or be able to lodge an application for tax concessions in a timely manner. This should not be a factor in whether they are determined eligible for tax provisions (Principle 4).
- Understanding that a perpetrator of violence may be acting on a taxpayer's behalf, or may force their partner to act under duress. Deliberate non-compliance may result from abuse rather than ulterior motives.

We welcome opportunities to engage with the ATO further on these and other issues relating to financial abuse and tax concessions.

Yours sincerely,

Katherine Berney

Executive Director

Working with Women Alliance