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21 September 2015

Committee Secretary
Senate Standing Committees on Community Affairs
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Parliament House
Canberra ACT 2600

By email to: community.affairs.sen@aph.gov.au

Dear Committee Secretary

Inquiry into the Social Security Legislation Amendment (Debit Card Trial) Bill 2015

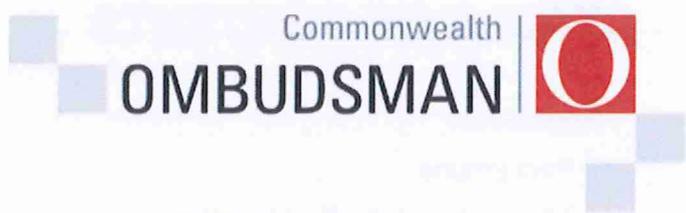
Please find enclosed, our submission to the inquiry into the Social Security Legislation Amendment (Debit Card Trial) Bill 2015.

Any questions about the submission may be directed to Mr George Masri, Senior Assistant Ombudsman on [REDACTED].

If any member of the committee would like to speak to me personally, I can be contacted by telephone on [REDACTED].

Yours sincerely

Richard Glenn,
Acting Commonwealth Ombudsman



Submission by the Commonwealth Ombudsman

PARLIAMENTARY INQUIRY INTO THE SOCIAL SECURITY LEGISLATION AMENDMENT (DEBIT CARD TRIAL) BILL 2015

**CONDUCTED BY
SENATE COMMUNITY AFFAIRS
LEGISLATION COMMITTEE**

Colin Neave
Commonwealth Ombudsman

September 2015

Commonwealth Ombudsman's submission to the Senate Community Affairs Legislation
Committee Inquiry into the Social Security Legislation Amendment (Debit Card Trial) Bill 2015

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INTRODUCTION

Background

The office of the Commonwealth Ombudsman was established by the *Ombudsman Act 1976* (the Ombudsman Act). The Commonwealth Ombudsman safeguards the community in its dealings with Australian Government agencies by:

- correcting administrative deficiencies through independent review of complaints about Australian Government administrative action
- fostering good public administration that is accountable, lawful, fair, transparent and responsive
- assisting people to resolve complaints about government administrative action
- developing policies and principles for accountability
- reviewing statutory compliance by agencies.

The Commonwealth Ombudsman opened for business in 1977 with jurisdiction to investigate complaints about the administrative actions of Australian Government departments and agencies. Since then, the Ombudsman's role has grown and diversified as Parliament has expanded the jurisdiction to address issues in particular areas of administration.

The Commonwealth Ombudsman's unique position in the Australian administrative law landscape provides us with an understanding of many individual experiences of members of the public, who are dissatisfied with the way that government has dealt with their issue. Parliament has given the Ombudsman's office the power to investigate those complaints by obtaining records and information from the agency that would not ordinarily be available to a person acting on their own behalf. Over time, through investigating complaints about the actions of a particular Commonwealth department or agency; the Ombudsman's office is able to build up a detailed picture of an agency's operations. This includes information about new complaint trends and also about the persistent problems that repeatedly crop up, despite changes intended to address them.

Complaints provide an important opportunity to identify and correct mistakes and can be an early warning system for systemic or deeper problems. An accessible complaints process is particularly important for vulnerable or disadvantaged groups as fair and transparent government administration depends on the capacity to identify and address complaints from these groups. In our experience, Indigenous people, and particularly those living in rural and remote regions, do not generally access existing review processes or complaints channels and their awareness of programs, services and decisions affecting them is often low.

The Commonwealth Ombudsman's oversight of income management

The Commonwealth Ombudsman has been involved in the oversight of the income management (IM) scheme since it was first introduced in the Northern Territory (NT) in 2007. In addition to receiving and investigating complaints about the scheme, our staff have observed the rollout of various aspects of the scheme in remote NT communities; conducted dual head setting sessions with Centrelink staff during

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phone calls with IM customers; conducted own motion investigations; and investigated systemic issues associated with the program.

Our office has made and continues to make suggestions and recommendations to the Department of Human Services, the Department of Social Services and Parliament, about IM's administration, based on insights gleaned through our complaint and own motion investigations. Our public reports and submissions on IM make up only a small proportion of our work in this area. To date, our public reports and submissions focusing exclusively on IM include:

- Department of Families, Housing, Community Services and Indigenous Affairs and Centrelink: Review rights for income managed people in the Northern Territory (Report 10/2010)¹
- Review of Centrelink Income Management Decisions in the Northern Territory: Financial Vulnerability Exemption and Vulnerable Welfare Payment Recipient Decisions (Report 4/2012)²
- Submission to the inquiry into the Social Services Legislation Amendment (No. 2) Bill 2015.³

SUBMISSION IN RELATION TO THE BILL

The Social Security Legislation Amendment (Debit Card Trial) Bill 2015 aims to implement a trial of cashless welfare arrangements in up to three designated locations. Participants in the trial will include all people residing within the trial sites who receive a working age welfare payment, with an option for aged pensioners and other welfare recipients to opt in to the scheme voluntarily. Participants will have 80 per cent of their welfare payments disbursed into a restricted bank account which will restrict access to cash, gambling products, alcohol and illegal drugs. Participants will be able to access the remaining 20 per cent of their income support payment in cash or at their discretion. The trial proposes to incorporate community bodies who will be authorised to approve a reduction in the proportion of an individual's restricted payment, to not less than 50 per cent of their overall payment amount.

The proposed administrative framework for cashless welfare arrangements appears to differ from that of IM. However, key similarities of the schemes are that both aim to reduce the amount of money available to people to spend on alcohol and gambling whilst aiming to encourage socially responsible behaviour. Both also rely on some form of welfare quarantining and the use of a specified debit card to access funds.

For government programs like IM and the proposed debit card trial, the potential impact on the individual autonomy of those affected is significant. It is therefore imperative that the administration of these measures is robust, well considered, and supported by clear guidelines and quality complaint, review and evaluation processes that are accessible to those affected.

The Ombudsman's office has identified issues with the IM scheme's operation and administration and has brought these matters to the attention of government. In successfully working with government agencies, remedies have been found and significant improvements in the operation of income management have been achieved more generally.

¹ www.ombudsman.gov.au/files/FaHCSIA-Centrelink_Review-rights-income-managed-people-NT.pdf

² www.ombudsman.gov.au/files/review_of_centrelink_income_management_decisions_nt.pdf

³ www.ombudsman.gov.au/files/sub05_CO.pdf

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As a result of our work in relation to the IM scheme, we believe our office is well placed to comment on a number of lessons learned which are relevant to the roll out of the proposed new debit card trial.

In line with earlier submissions and reports our office has made in relation to IM, we also urge caution in relation to the targeting of customers for the measure based on their membership of a particular class or group, as opposed to targeting individuals based on their particular circumstances and need. We are concerned that this aspect of the proposed scheme, along with the lack of an exit mechanism leaves open the way for people to be become caught in a system that is not appropriate to their circumstances and may be detrimental to their wellbeing.

Finally, we have some concerns at the lack of detail and structure provided in relation to the community bodies who will play a role in decision-making under the new scheme.

Lessons learned in relation to Income Management

Over the years since IM's commencement in 2007, the Commonwealth Ombudsman has received a large number of complaints relating to the administration of IM and the BasicsCard. Initially complaints arose because people did not understand the workings of IM and the BasicsCard, did not like IM, or they considered the application of IM to be unfair. Over time, the nature of these complaints has changed and they now focus more on Centrelink's decisions, IM allocation issues, problems with Centrelink's approach to assisting people to meet their priority needs, BasicsCard limitations, BasicsCard merchant issues and the quality of communication.

Our involvement in IM has identified two key issues relevant to the debit card trial, which we will address in this submission. These are accessibility issues and the workings of IM and BasicsCard, and communication.

Accessibility issues and the workings of IM and BasicsCard

Complaints and observations have identified a number of problems with the workings of IM and BasicsCard that have had adverse consequences for individuals. Given the similarities between IM and the proposed cashless welfare arrangements, we anticipate that similar problems could arise during the debit card trial, unless measures are taken to address them.

BasicsCard

Some of the BasicsCard issues we have come across include:

- The high cost of checking account balances. Until Telstra's recent move to make calls from mobiles to 1800 numbers free of charge, IM customers sometimes incurred significant costs when calling toll free IM telephone numbers from mobiles in order to check their BasicsCard balance or transfer money to their Basicscard. Many IM customers live in remote communities where people use mobile phones and do not have access to landlines. Yet, most IM customers make calls to these Centrelink numbers so they can check their IM and BasicsCard balances. Consequently, in the early stages of IM, there was a disproportionately high cost imposed on these customers in order for them to manage their funds and meet their day to day needs.

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- People were not initially able to transfer money to their BasicsCards on weekends or after hours. Further, some elderly Indigenous people in remote locations reported finding it difficult using phone services and have had limited other options to access IM information. We note that Centrelink has now extended the operating hours of its IM phone service, including over weekends.

In light of these issues, we consider that the Debit Card Trial should ensure that all participants have simple, quick and free access to information about their account balances, including on weekends and after hours, taking into account the fact that many participants may not have easy access to reliable phone or internet services. Any banks involved in the trial should have 1800 numbers available to trial participants for this purpose, and consideration should be given to providing other free mechanisms for participants to access information about their accounts.

- Complaints that some BasicsCard merchants have discriminated against BasicsCard customers and treated them poorly. In response to one complaint investigated by the Ombudsman, Centrelink approached the store owner involved to explain that it expects BasicsCard merchants to treat customers with courtesy and respect and that the merchant would need to comply with these expectations in order to remain a BasicsCard merchant. Centrelink subsequently expanded its merchant terms and conditions to allow it to address merchant behaviour towards customers in its compliance and approval work.

While we understand the cashless welfare card is intended to be less conspicuous than the BasicsCard, if the card is nevertheless able to be distinguished from a normal debit card, including if or when purchases may be blocked at point of sale, then problems with discrimination by merchants may still arise. This issue will be more difficult to monitor and address under the new scheme as there will not be an approval process for merchants.

We understand that the debit card trial will seek to ensure the card works at all existing terminals and shops in trial sites (except those that are restricted), and we expect that government agencies will therefore have some level of interaction with local businesses prior to and during the trial. We suggest that during these interactions, the government make clear that discrimination is impermissible, and that this message also be promulgated to trial participants, together with clear information about how and to whom they can complain should they be treated poorly as a result of their participation in the debit card trial.

Income Management

Making IM more flexible

The Ombudsman's office has received positive feedback from some IM customers, indicating they like the BasicsCard and IM. A number of IM customers, people not eligible for IM and community organisations have also approached our office with suggestions for improving IM. A common theme amongst these suggestions is that people would appreciate a greater level of flexibility to increase their sense of personal control and responsibility for their money.

We have also received general feedback from people and representative organisations that many people would like to utilise voluntary IM, but they would like

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more control over the percentage of their payments that are managed and easier processes for opting-in and out at their own discretion.⁴

With this in mind, we suggest that consideration be given to increasing the flexibility available to voluntary participants in the debit card trial to adjust the percentage of their restricted payments.

Communication

Since IM's inception, this office has received a large number of complaints highlighting communication problems and confusion amongst customers about a range of IM issues, including:

- insufficient information provided to customers about IM processes and options, including exemptions, reviews, accessing balances, transferring funds and changing IM allocations
- confusing or inadequate information provided in Centrelink letters
- difficulty in understanding IM account statements
- the need for greater use of interpreters when explaining and discussing IM with customers.

Although the proposed debit card trial appears less complex than the administration of IM, it is important that communication strategies are developed to inform and explain all aspects of the scheme to potential participants before it is rolled out. Our observations from complaints and investigations highlight some simple but important lessons in this area.

Inadequate information and communication

Of the IM-related complaints we have investigated, a common remedy that we have obtained for complainants is a better explanation of IM processes and decisions affecting them. We have regularly reported to agencies the need to improve communication surrounding IM and test customers' understanding of key concepts.

When the new model of IM was rolled out in the NT from August 2010, this office took the opportunity to observe various aspects of this process, including Centrelink's one-on-one interactions with new and existing IM customers.

Our observations culminated in feedback to Centrelink and Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) in November 2010, focussing on the importance of:

- Centrelink staff providing complete and accurate information relevant to each individual customer
- agencies seeking feedback from communities about the effectiveness of information delivered at community information sessions
- providing consistent and quality information to customers.

This office considers it likely that the government will face many of the same challenges in rolling out the debit card trial. Centrelink commissioned a research

⁴ We understand that under the current measure of voluntary income management, participants are required to remain on the measure for at least 13 weeks from the date of commencement. See the Guide to Social Security Law at: <http://guides.dss.gov.au/guide-social-security-law/11/7/8/10>

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project in 2010, 'Research to support communication for Income Management,' with the objective of evaluating the effectiveness of communication activities and tools used to support income management, which it expected would identify opportunities for improvement.

The debit card trial should carefully consider observations from this office and other stakeholders and agencies' lessons arising out of the IM measures implemented to date, together with any research or commentary that considers the particular needs of the trial sites, including the need, in some regions, to communicate messaging into language, through a variety of media.

Given the involvement of banks, as well as government in the proposed scheme, it is also important to consider who will deliver the messaging around the scheme, and to ensure that messages communicated by different bodies (for example, Centrelink, banks and community boards) is clear and consistent. This is likely to require the provision of staff training, directions, scripts and guidelines about providing information to scheme participants and merchants.

Quality of letters

The new IM model that was rolled out in the NT in 2010 offered a good opportunity for Centrelink to improve its letters about the program, yet our office found a number of Centrelink's IM letters to be of poor quality, not properly informing customers of decisions that affect them or their options.

In the course of our investigations, our office has identified the following problems with Centrelink's letters:

- Lack of reasons and other relevant information in decision letters - decision letters should provide sufficient information to understand the decision that has been made and the program under which it has been made, why it has been made, what it means for the customer and what they can do if they disagree.
- Lack of review rights information - Centrelink's customers can request reviews of most Centrelink decisions. While we commonly receive a range of complaints about review processes, it is usually the case that Centrelink's letters provide information to people about their review rights. We have observed, and reported on, a number of IM decision letters where no such review right information has been provided.
- Inaccurate or unclear information – the Ombudsman has identified problems with the information contained in IM letters and has received complaints resulting from confusion. Issues include confusing terminology, multiple letters being sent to a customer in one day and lack of detail to assist a customer to take further action.

It is imperative that all letters associated with the debit card trial are reviewed against these and other best practice principles, and relevant legislation before the scheme commences.

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Use of interpreters

In 2010, this office released a report about the lack of awareness of the need for, and skills in working with, Indigenous language interpreters.⁵ The report acknowledged that Centrelink's policies for the use of interpreting services generally aligned with best practice principles. We also noted that Centrelink Remote Servicing Teams booked interpreters for every period of service delivery to communities, occasionally requiring them to transport interpreters to assignment locations.

However, through our complaint investigation and own motion work, this office has identified a number of occasions in which government agencies did not use interpreters when they should have.

It is likely that the debit card trial will affect a proportion of people from culturally and linguistically diverse backgrounds. This will require consideration of whether interpreters are required. The bodies administering the scheme, be they government, banks or community bodies, will need to engage interpreters where appropriate.

In summary, complaints to this office continue to highlight that culturally appropriate communication and the provision of clear information are paramount in ensuring that people understand government schemes that affect them, how they will be affected, and what process they should undertake if they wish to challenge a decision or exercise their rights to apply to opt out, or in the case of the debit card trial, have the percentage of their restricted payment reduced. Information needs to be accessible, available in appropriate languages and available through a variety of methods. It is also important that when something changes, people are advised of the changes and provided with the opportunity to ask questions and seek further information.

The government needs to be upfront in approaching affected individuals to seek feedback about the operation and efficacy of the scheme and needs to develop and implement clearly defined evaluation measures before the scheme rolls out.

The use of class-based targeting

While the administrative 'management' of a person's welfare payments by government is less involved under the new scheme, allowing individuals to manage their own money for the most part, the mandatory 80% initial payment restriction⁶ still imposes a significant constraint on affected individuals. This has the capacity to result in financial detriment and social exclusion for those affected by restricting their options to spend their money how they wish.

For people living on income support, needing to stretch their income as far as possible, purchasing flexibility is important. People will be restricted in their capacity to:

- buy second hand items
- access public transport and parking
- purchase goods or services from private sellers
- shop at garage sales or markets
- take advantage of 'cash only' discounts

⁵ *Talking in language: Indigenous language interpreters and government communication report 5/2011* – available at http://www.ombudsman.gov.au/files/Talking_in_Language-Indigenous_Interpreters_REPORT-05-2011.pdf

⁶ Unless or until reduced to a minimum of 50% by an authorised community body

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- participants may be forced to spend more than intended where minimum purchase limits apply.

Participants will also be limited in the extent to which they can contribute to, and engage in, social events. For example, there will be less cash available for attending school fetes, charity events and children's outings, and participants will face difficulties participating in functions such as weddings and funerals held at local hotels or other restricted venues.

Finally, payment of rent and board is often required in cash. Our office has recently investigated a case in which a participant on the vulnerable youth measure of IM obtained an exclusion from the measure because a Centrelink social worker determined that the 50% quarantining of the person's welfare payment under IM was detrimental to their wellbeing. This decision was made on the basis that the restrictions imposed by IM made it difficult for the person to pay his rent and placed him at risk of homelessness. Under the debit card trial, this person would have had even less cash available to pay his rent but there would be no option for him to exit the measure.

Targeting based on individual circumstances

In light of this information, it seems that the burden imposed on trial participants could be significant. When IM or welfare quarantining is applied to people based on their membership of a particular class or group, rather than based on their individual circumstances and need, there is an increased risk that it may be applied to people for whom it is not appropriate and in fact could be detrimental.

While imposing some level of inconvenience on participants may not be unreasonable if circumstances warrant this, it is unclear why the current Bill proposes to impose restrictions so broadly, rather than targeting the measure towards individuals based on their specific circumstances and need.

In September 2014, the largest and most in-depth evaluation of income management to date was completed by Rob Bray et al – *Evaluating New Income Management in the Northern Territory: Final Evaluation Report*. The report found that overall, IM was not achieving its objectives. However, there was some evidence to show that IM may be a successful intervention when used as part of an individually tailored program for individuals who had been specifically targeted as a result of their identified individual vulnerability or problem.⁷

The local district council of Ceduna, which supports and has called for IM to be introduced, has noted in its submission to the Inquiry that mandatory IM must be a fundamental intervention strategy in situations where a person or their family's welfare is at risk as a result of alcohol or drug consumption. The Council seeks support for the implementation of targeted IM for people who are at serious risk as a result of alcohol misuse.

The Ceduna council has identified triggers or indicators which it considers would help to identify people at risk, such as repeated use of sobering up services or the issuing of a barring order.

⁷ *Evaluating New Income Management in the Northern Territory: Final Evaluation Report*, J Rob Bray, Matthew Gray, Kelly Hand and Ian Katz, p320

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Rather than applying the measure to large groups of people across the trial regions, the majority of whom do not abuse alcohol or drugs, the trial could be more cost effective and have a better chance of success, based on current evidence, if triggers were used to identify people who are in need of intervention.

Currently, under the Cape York and social worker initiated measures of income management, individual triggers prompt further assessment of the person's circumstances and consideration of whether IM or welfare quarantining would assist the person, and of what other support mechanisms might be needed.

Application of welfare quarantining as part of a holistic response

Restricting the amount of money a person has available to spend on alcohol is only one of a number of interventions required to address underlying problems faced by individuals. Without investment in other support services, it is difficult to see how the measure will succeed in addressing the long term, underlying causes of the social problems it proposes to address. This is particularly in light of existing evidence that, apart from those measures which take a holistic approach, earlier forms of income management have not achieved their objectives.

In our view, the imposition of any form of IM or welfare quarantining should be considered in the context of the person's individual circumstances and be applied in conjunction with other measures designed to support the person in addressing their underlying problem.

As we have observed in relation to IM, and as numerous commentators have highlighted, without other support mechanisms designed to address a person's underlying issues, desperate people who are deprived of cash are likely to find ways to get around the limits imposed by welfare quarantining. This can result in adverse outcomes for other members of their communities. In addition, the cultural economy and sharing practices of many Aboriginal people mean that attempts to restrict expenditure on prohibited items can be easily circumvented. For example, the Cape York Welfare Reform Evaluation, conducted by the department of FaHCSIA in 2012 found that some community members had found ways around income management, producing unintended consequences:

...such as clients on income management harassing relatives for access to alcohol or drugs. It appears that for this group income management has little effect.⁸

Similarly, the Queensland Parliament Health and Community Services Committee reported in 2014, that:

in their consultations 'stakeholders stated that family members often share cards and that the goods purchased with BasicsCards can be readily traded in "culturally sanctioned reciprocal sharing of alcohol and tobacco".⁹

Conversely, there is a body of evidence which suggests that individual case management (in the context of applying IM along with other supports) can contribute to positive outcomes. The Cape York Institute's paper *From hand out to hand up*,

⁸ Cape York Welfare Reform Evaluation, Department of Social Services, 2012, p212

⁹ *Oversight of the Family Responsibilities Commission*, Report No. 49, Health and Community Services Committee May 2014, p 8.

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cites international research from school attendance programs in the United States which found that programs that relied primarily on financial sanctions (or threat thereof) had a negligible effect on school attendance, whereas those that combined sanctions with case management, supportive services, and positive financial incentives... showed more positive results.¹⁰

Need for an exit strategy

In light of the potential for welfare quarantining under the proposed scheme to detrimentally affect participants, the Bill should (but does not) provide any means for individuals to seek to be excluded or exited from the measure, and nor does it provide an exit pathway for participants who can show they have improved their situation under the scheme.

As indicated in our office's recent submission to Parliament in relation to the Inquiry into the Social Services Legislation Amendment (No. 2) Bill 2015 (which proposed changes to income management), limiting exemption options for individuals may mean that some people will be stuck in a system that could potentially exacerbate their disadvantage. Using the case example cited above of a complainant to this office who was struggling to pay his rent, had this person not had the option to seek and obtain an exclusion from IM, then it is possible that the very scheme designed to help him might have caused him to become homeless.

Under the proposed debit card trial, there will undoubtedly be people who are disadvantaged by the scheme, including vulnerable people, who may experience unintended consequences. In some such circumstances the scheme may prove counterproductive. On this basis, this office recommends that safety net provisions be factored into the scheme to ensure that vulnerable people impacted by the scheme are able to be exited from the measure, where appropriate, to ensure they are not further disadvantaged.

More broadly, by failing to include an exit strategy for customers who meet their social obligations, the incentives to encourage socially responsible behaviour are limited. The Australian National Audit Office (ANAO) commented on this issue in the context of its 2013 review of Administration of New Income Management in the Northern Territory. Specifically, the ANAO pointed out that

(Exiting customers) is not an explicit objective of the scheme, and as a result, there were no specific strategies in place to achieve this outcome. While some customers are likely to remain on income management indefinitely due to their personal circumstances, there are others who would benefit from a defined pathway to exit the scheme. This would be consistent with the overall aims of income management – to promote and support positive behavioural change and personal responsibility – and would contribute to lowering the relatively high costs of administering the scheme.

The ANAO suggested there would be merit in the relevant departments developing strategies to assist customers to exit income management where appropriate. This office supports the ANAO's position and suggests that, given the proposed debit card scheme has a similar objective of encouraging socially responsible behaviour, this recommendation should be considered in the context of the Bill.

¹⁰ From Hand Out to Hand Up, Cape York Welfare reform Project Design Recommendations, May 2007.

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Community Bodies

While this office supports, in principle, the incorporation of community bodies in decision-making processes for programs that are geared towards effecting behavioural change in communities, we are concerned at the lack of detail provided regarding this aspect of the scheme.

Unlike similar models for local community authorities, such as the Family Responsibilities Commission (FRC) operating in Cape York, the Bill does not include any details as to associated support programs, statutory frameworks, funding, contracting and remuneration arrangements, professional development or protection for members.

Careful consideration will need to be given as to how community bodies and members are selected, and how government will satisfy itself that members are appropriate. Quality control and compliance frameworks will need to be developed to ensure community bodies act within their ambit and comply with the rules.

Our office is also concerned at the lack of information concerning decision-making processes, reviews, appeals or complaints mechanisms for individuals who disagree with decisions made by community bodies. Some of the issues to consider include the following:

- Within what timeframe must community bodies issue a direction following a request?
- What factors must community bodies consider when making decisions?
- How will community bodies be supported in their decision-making?
- How will the government ensure decision-making is consistent across and between trial-sites?
- How will decision records and evidence be kept and maintained?
- How, and within what timeframe will participants be notified of decisions?
- How will the role and ambit of community bodies be explained to participants?
- What means of recourse or review are available to participants who are dissatisfied with a decision by a community body?
- Who will be responsible for undertaking reviews?
- Who will be responsible for handling complaints?

These are some of the questions that should be addressed before the scheme is rolled out.

Further, in our view the Bill could provide greater clarity regarding community bodies' true authority and decision making responsibilities. This would assist in providing government with a true measure of the impact the involvement of community bodies in the trial will have on effecting behavioural change. In similar programs, evidence indicates the positive impact of community bodies on fostering behavioural change, is linked closely to the individual case management and monitoring conducted by these bodies.¹¹

¹¹ *Cape York Welfare Reform Evaluation*, FaHCSIA, 2012, p212:
https://www.dss.gov.au/sites/default/files/documents/03_2013/cywr_evaluation_report_v1.2_0.pdf