

## Shaping the Future of Centrepay

### Response to Survey Questions via DSS Engage

21 April 2025

Inclusion Australia is the national peak organisation representing the rights and interests of Australians with an intellectual disability and their families. Founded more than 70 years ago in 1954, our mission is to work with people with an intellectual disability, their families and our members to make positive change. Our strength is in our national representation and our connection to our community. We have a member organisation in every state and territory across Australia:

- ACT Down Syndrome and Intellectual Disability (ACT DSID)
- Council for Intellectual Disability (NSW CID)
- Developmental Disability WA (DDWA)
- Inclusion Northern Territory (Inclusion NT)
- Parent to Parent Queensland (P2P)
- South Australian Council on Intellectual Disability (SACID)
- Speak Out Advocacy (Tasmania)
- Victorian Advocacy League for Individuals with Disability (VALID).

Thank you for the opportunity to take part in this consultation. Many people with an intellectual disability and families in our community use Centrepay, and feedback from our member organisations indicates that it is an important service that assists in easing administrative burdens and promoting pathways for increased financial independence and self-management. We have also heard that Centrepay is important for people in our community who may be experiencing Family and Domestic Violence (FDV), providing the security of knowing vital payments can continue to be safely made and a portion of their income is secure.

We would like to express appreciation for the NSW Council for Intellectual Disability's (CID) Advocacy Group (AG), which is made up of members who are people with intellectual disability who meet monthly at CID to discuss and be consulted on matters pertaining to systemic advocacy. We draw on their feedback and quotes in this submission.

#### **How would the removal of the Service Reason/s affect you, or your business?**

Our community is overwhelmingly against the proposed removal of certain services from Centrepay due to the negative impacts this could have on people with intellectual disability. One person with an intellectual disability in our community summarised his thoughts as such: "Don't change Centrepay during a cost-of-living crisis."

People with an intellectual disability told us they were unaware of many of the functions that Centrepay fulfils beyond rent and utilities payments. Because of this, they felt strongly that the proposal to remove some services from Centrepay's remit due to a low uptake was the wrong solution. Instead, their preference is for Centrepay to instead better advertise these services to potential Centrepay clients.

Our community drew attention to two areas in particular:

Car registration: There is strong disagreement with ceasing the inclusion of car registration in Centrepay's payment services. We are concerned that, despite the apparent low uptake, the people who do use it will be disadvantaged. Moreover, our community felt strongly that the low uptake is a result of people not knowing that they can use Centrepay for car registration. As a result, we encourage Centrepay to ensure that more people know about it.

Savings: Our community strongly disagreed with the proposed removal of savings from Centrepay's services. They said that if it helps some people, Centrepay should keep providing it as an option. They also said that some people use Centrepay's savings option to avoid unexpectedly going into debt – i.e. it builds up a buffer for them in case unexpected costs arise and they need to use their savings.

### **Would the introduction of proposed mandatory conditions (such as target amounts or end dates), set out in Schedule 1 of the draft Centrepay Terms of Use, impact you, or your business?**

We agree with the need to prohibit never-ending deductions, with the exception of accommodation and utilities by introducing an end date and a target amount for each arrangement. Deduction arrangements that will last longer than 12 months need an accessible mechanism for Centrepay users to review and reconfirm them at least once each year.

### **Having reviewed the new Business application form and Centrepay Policy for Business, will the additional requirements proposed by the agency have an impact on you, or your business?**

In their current forms, all new application forms and policy documents (and the consultation papers more generally) are not accessible for people with an intellectual disability.

Our community is clear that lack of accessibility is a barrier across the Centrepay system more broadly, too.

People with an intellectual disability raised concerns about the inaccessibility of the online options, with their overall feedback being that myGov is very difficult for them to navigate without support:

- “My disability support worker helped me [to apply on myGov].”
- “I could not do it online.”
- “I need a support worker to help me [to navigate myGov], and support workers are not always available.”
- “I need help on the myGov website. I can get in, but I need help [navigating it].”
- “I went into Centrelink to get help with myGov, and they said just to come into office.”

Furthermore, we note that there is no easily accessible Easy Read version of relevant Centrepay information or application forms.

While Services Australia has attempted to demystify the online application process by [making a step-by-step guide with screenshots and accompanying text](#), the guide is inaccessible for people with intellectual disability (and potentially others with different disabilities), presenting a visually cluttered and confusing set of instructions.

One of our community members also shared the difficulty he had had when navigating a dispute involving Centrepay, which raises serious concerns about procedural accessibility for people with intellectual disability in Centrelink processes. Having successfully applied to use Centrepay to make a compulsory payment for a service, the member was subsequently sent a bill by that service. The service claimed that Centrepay hadn't paid the bill. When the member attempted to resolve this with Centrepay, staff told him that it had been paid in full for some time. The member experienced significant confusion and distress in attempting to navigate and mediate this dispute. This distress compounded the existing stress he was experiencing at the time. This case study spotlights the potential inaccessibility of existing systems and processes within Centrepay for people with an intellectual disability.

Centrepay needs to make sure that their internal processes regarding payment disputes are examined and optimised for accessibility for people with an intellectual disability.

We also wish to note that while we welcome the ongoing consultation with community to test and refine the proposed reforms to Centrepay, both the previous and current consultations have not included accessible versions of consultation papers, including Easy Read.

This, together with the short consultation period, has significantly limited opportunities for our community to take part in shaping the future of the program. This also prevents people with an intellectual disability who use Centrepay from understanding the proposed reforms and what the changes may mean for them.

We ask that future consultations on any Services Australia programs include accessible mechanisms for consultation, including Easy Read translations of all consultation information and extended timelines for engagement.

In addition, the forthcoming reforms to Centrepay should be communicated in timely and accessible ways, including through Easy Read information, to ensure that people with an intellectual disability are aware of the changes and can make informed decisions about their use of the service.

We warmly invite further conversations or questions about increasing the accessibility of consultation and communications about the reforms.

### **Would the introduction of a mandatory Deduction Authority form, set out at Centrepay Terms of Use at Schedule 3 ‘Form of deduction authority’ impact you, or your business?**

Deduction arrangements that will last longer than 12 months need an accessible mechanism for Centrepay users to review and reconfirm them at least once each year.

### **Having reviewed Clause 9.6 (You must cancel customers’ deduction authorities in some cases) within the Centrepay Terms of Use (with respect to accommodation arrears), will this have an impact on you or your business?**

Feedback from our member organisations highlighted that the payment of arrears is an important safeguard against the poor payment records or blacklisting experienced by some customers due to their inability to pay arrears through Centrepay. However, as an added safeguarding measure, we recommend that arrears payments be made an opt-in, voluntary process for customers. Customers must also be provided with accessible information explaining how they have accumulated arrears and how they can use Centrepay to manage or repay them, including information about advocacy and/or legal support services.

### **Are there any other changes that could help better protect customers?**

Inclusion Australia and our members strongly agree with the need to reform Centrepay to strengthen safeguards against exploitation, increase supports for those using the service, and preserve the voluntary, self-directed nature Centrepay. This is crucial for people with an intellectual disability, who are more likely to experience barriers to financial independence, lack of support for financial decisions, and financial exploitation.

Multiple research studies have found that people with an intellectual disability are more likely to experience financial exploitation compared with other people with disability, and the general population more broadly. This was also a key finding from the Disability Royal Commission. While many businesses use Centrepay fairly, stronger protections are needed to eliminate instances of businesses targeting populations who are more susceptible to exploitation, and stronger supports are needed for this cohort.

For example, the Justice and Equity Centre (JEC) has outlined many examples of poor – and in some cases, abusive – businesses practices through the use of Centrepay. In many of these instances, the people being targeted may not be aware that the business is in breach of Centrepay policy and are unlikely to make a

complaint. This issue is likely to significantly impact people with an intellectual disability, where the lack of accessible information and complaints pathways is a barrier across multiple systems.

The Disability Royal Commission made a number of important recommendations to improve oversight and complaints mechanisms across government systems. We note the recent investment in the Complaints Resolution and Referral Service as part of the Government's initial response to Disability Royal Commission Recommendation 11.4 to create accessible complaint pathways.

We recommend that as part of the Centrepay reforms, the Department of Social Services works with Services Australia to develop accessible information about this service – which does not currently exist – and actively promote the service to the community, including how it can be used to investigate and resolve complaints arising through Centrepay operations.

### **Do you have any suggested improvements you would like to provide about your obligations and rights with respect to incorrect payments?**

People with an intellectual disability who use Centrepay also require accessible information about their rights and what safeguards are in place to protect them from exploitation by poor business practices, which does not currently exist. This gap has not been recognised or addressed by the current proposals set out in the consultation paper. We recommend the Department work with Services Australia to develop accessible information about individual rights and complaints pathways, which must include information about accessing support through Services Australia and externally through individual advocacy and legal support services.

In addition, as part of the intent to strengthen protections for customers of Centrepay, we believe improvements to communication systems are urgently needed to ensure they meet the needs of people with an intellectual disability. We recommend Services Australia implement an alert to Centrepay users if their proposed deduction will exceed a certain percentage of their social security payments, which must include a referral to independent advocacy and/or legal support services.

### **Do you have any further feedback on the proposed reforms?**

Thank you again for the opportunity to take part in this consultation. We warmly invite further conversations with the Department about any of the issues or recommendations we have raised.