

26 August 2019

Senator the Hon. Amanda Stoke
Chair
Senate Standing Committees on Legal and Constitutional Affairs
Australian Parliament House
Canberra ACT 2600

By email: legcon.sen@aph.gov.au

Dear Senator

Re: *The impact of changes to service delivery models on the administration and running of Government programs*

We welcome the opportunity to provide comment on the Senate Inquiry into the impact of changes to service delivery models on the administration and running of Government programs.

People with Disability Australia (PWDA) is a leading disability rights, advocacy and representative organisation of and for all people with disability. We are the only national, cross-disability organisation. We represent the interests of the 1 in 5 Australians with a disability.

We are a non-profit, non-government organisation with a primary membership made up of people with all types of disability, and organisations primarily constituted by people with disability.

We are also a founding member of Disabled People's Organisations Australia (DPO Australia) along with Women With Disabilities Australia, First Peoples Disability Network Australia, and National Ethnic Disability Alliance. Disabled Peoples Organisations (DPOs) are led by, and constituted of, people with disability.

We have a vision of a socially just, accessible and inclusive community, in which the human rights, belonging, contribution, potential and diversity of all people with disability are recognised, respected and celebrated with pride. PWDA was founded in

Postal address:

PO Box 666
Strawberry Hills NSW 2012

Street address:

Level 8
418a Elizabeth Street
Surry Hills NSW 2010

Phone: 02 9370 3100

Fax: 02 9318 1372

Toll Free: 1800 422 015

NRS: 1800 555 677

TTY: 02 9318 2138

TTY Toll Free: 1800 422 016

TIS: 13 14 50

Email: pwd@pwd.org.au

ACN: 621 720 143



1981, the International Year of Disabled Persons, to provide people with disability with a voice of our own.

Introductory comments

PWDA has significant concerns about several aspects of recent service delivery models, especially those that relate to the National Disability Insurance Scheme (NDIS) and Agency (NDIA) and to Centrelink in the Human Services portfolio.

As part of our work with DPO Australia, we recently conducted a survey of nearly 900 people with disability for the Civil Society Convention on the Rights of Persons with Disabilities Shadow Report. Our survey found most of us had difficulty accessing government services and agencies (67%). Many survey respondents had experienced discrimination and disrespect from government agencies including Centrelink and the NDIA.

People with disability also told us that language used by government negatively impacts people with disability. The language used perpetuate the stigma that people with disability are a “burden”, and are not entitled to the benefits they receive. Having to constantly prove one’s disability also strongly contributed to the overall inaccessibility of human services.

Our overarching concerns include:

- direct impact on our right to access to essential supports
- quality of service delivery, particularly the impact on accessibility and inclusive delivery for people with disability
- fairness of programs
- development of capacity of staff.

Considering the above, this submission will only focus on: (b) Centrelink’s Robodebt compliance and outsourced debt collection program, and; (c) the broader outsourcing of functions in the Human Services portfolio and at the NDIA.

Centrelink’s Robodebt compliance and outsourced debt collection program

(i) The integrity and impact of the automated debt collection processes

PWDA, with our colleagues in DPO Australia, have been calling for an end to the Centrelink automated debt program since 2017, because of the impact this is having on people with disability, and our organisations.



The impact of automated debt collection processes undermine the integrity of the program. For those that work in casual or contract work, this compliance system is particularly problematic as it doesn't take into account the often sporadic nature of income for people with disability who also rely on income support.

(ii) The integrity and impact of the automated debt collection processes

There are significant limitations to Robodebt collection methods, and we raised these limitations when the program was introduced. We raised concerns that people with disability may need more time and support to understand the information provided about these debts and compliance measures.

This information also needs to be available in different, accessible formats and there should have been increased advocacy available to support people with disability engage with the Centrelink system and manage such a stressful situation.

However, these measures were not put in place, and disability advocacy and representative organisations, such as PWDA, have been responding to increased numbers of calls from people with disability for assistance in managing these often distressing debt notices.

(iii) the identification of inaccurate debts – made without human oversight

People with disability have reported to us that they have found the whole debt recovery system extremely stressful and distressing, as well as confusing and time consuming to understand. They are often asked to provide information in ways that aren't accessible, and with limited time to respond. Information is not provided about why the debt came about, or how the amount was arrived at.

(iv) the impact to public sector employment – especially on the capacity and adequacy of staffing level

Staffing cuts, and outsourcing to often untrained staff, alongside automation, has made it much harder for people with disability to get information or explanations about what was happening to them.

This lack of well-trained staff means people with disability do not have someone they can go to and ask questions about a debt notice. The online compliance also is often inaccessible and difficult to use for many people with disability.

(v) the review and appeals process for debt notices

We asked people with disability about their experiences with Centrelink debt, and this is what they told us. People with disability's debts ranged from \$2,000 to \$45,000. While



some knew they could challenge or ask for a review of that debt, most hadn't done so. People with disability described how the debt had made them feel, telling us they felt worthless and angry, devastated, depressed and suicidal.

Many people with disability also had contact from debt collectors, and hadn't been able to access any help in dealing with the debt. For those that had asked for a review of the debt, several had had the debt reduced or waived, while others had not had their disability taken into account when dealing with Centrelink.

Broader outsourcing of functions in the Human Services portfolio and at the NDIA

(ii) the impact of capped staffing numbers and the efficiency dividend at government departments/agencies

PWDA has expressed strong concerns over many years about the impact of the staffing cap on the NDIA, which in turn affects the way the NDIS has been delivered to people with disability.

The NDIS was meant to transform the way that we received our essential supports, introducing a national, universal system to replace the old, broken, unfair one. But the NDIS is not currently helping all of us.

Since 2015, the NDIA has been subject to a staffing cap of 3,000. As a result, \$600 million has been spent on [consultants](#) and people have experienced huge delays in access, plans and reviews.

While the cap was raised slightly on 24 August 2018, this has not addressed the crisis in access and reviews. The staffing cap needs to be removed entirely, and the NDIA needs to significantly increase the number of staff, particularly staff with disability.

The NDIA was meant to develop considerable expertise and experience with people with disability, through employing significant numbers of people with disability and building that capacity as the Scheme rolled out across Australia. This expertise would flow into all areas of Commonwealth Government service delivery, ensuring that we have equal access to services as other Australians.

Instead, the staffing cap has made developing this expertise very difficult, with outsourced staff delivering the day-to-day interaction with people with disability via the call centre, and planning staff unable to deliver timely services.

(iv) the impact outsourcing has on service provision

People with disability have told us they often find that they are waiting months for plans, and then even longer for any reviews. People with disability report to us every week that



they are frustrated with their interactions with staff at the NDIA who do not have a basic understanding about disability, or disability rights and the social model of disability.

The NDIA has to be able to grow to deliver the NDIS as envisioned by people with disability, so that all people with disability can benefit from these supports. Currently, the NDIS is becoming a two-tiered system, with many people with disability missing out on a plan that truly meets their needs.

We know that many people with disability who live in group homes, boarding houses and other institutions, as well as culturally and linguistically diverse communities, and Aboriginal and Torres Strait Islander communities are finding the NDIS difficult to access. The lack of staff, and the lack of expertise and capacity among those staff are key factors that impact on making this harder.

PWDA recommends that the staffing cap at the NDIA is removed, and that contracted positions are brought back into the NDIA. We believe this will start to rebuild trust with the Agency and will deliver significantly improved services.

People with disability rely on the NDIA to provide the essential supports we need to have an equal and good life. Without those supports, people with disability will continue to have to fight to be fully included.

We thank you again for the opportunity to comment on the impact of changes to service delivery models on the administration and running of Government programs.

If you require further information, please contact me on 0431 998 273 or by email at romolah@pwd.org.au.

Yours sincerely

A handwritten signature in blue ink that reads 'Romola Hollywood'.

Romola Hollywood
Director, Policy and Advocacy