

Are you an individual or responding on behalf of an organisation?

Individual

Where are you located?

QLD

Are you urban (major city) / regional (city or town) / rural / remote?

Regional

Are you a person with disability?

No

Are you an Aboriginal or Torres Strait Islander Australian?

No

Are you from a Culturally and Linguistically Diverse (CALD) background?

No

Are you a Centrepay customer?

No

POLICY INTENT

Do the critical areas for reform outlined above reflect the evolving needs of customers and stakeholders?

yes

APPROVED GOODS AND SERVICES

Does the current list of authorised goods and services include what should be available through Centrepay?

Yes however work should be done to expand the availability of accommodation as an option. Currently many rental agencies do not allow Centrepay due to high fees difficulty with compliance. Increasing this uptake should be a priority to support housing stability for Cedntrelink customers.

Are there any specific goods and services, including those already approved on the program as per the listing above, that should be excluded from Centrepay?

Social and recreational as well as life, funeral and income protection insurance should be excluded

What criteria should be used to consider whether to include or exclude any goods or services?

Necessary for vulnerable customers

Industry history of using Centrepay as a marketing strategy to increase profits / increased prices for Centrepay

EG Crisco / Christmas layby products, life, funeral and income protection insurance are bad

DEDUCTION ARRANGEMENTS

Should there be restrictions on the types of deductions (i.e. ongoing, amounts) that can be established for specific goods and services?

Recreation and social should also be scrapped (or at least capped)

Should there be a maximum percentage limit on the amount customers can allocate from their Centrelink payment to their Centrepay deductions? Should this percentage apply to all Centrepay service reasons or to a selection of service reasons?

Cap of maximum 20% (combined) for Centrepay other than accommodation

Social worker approval should be required for all Centrepay over 50% to protect vulnerable customer. Social worker to confirm that this may be for accommodation with utilities and food for example.

Should businesses retain the ability to establish Centrepay deduction arrangements on behalf of customers?

Accommodation, utility and not for profit / low interest loan providers should maintain this to support vulnerable customers.

Insurance, consumer goods, recreational providers should lose this as they are using it as a marketing strategy to sign up vulnerable customers.

Should certain businesses have conditions imposed limiting the access they have to manage deductions on behalf of customers?

Yes. Insurance, consumer goods, recreational providers should lose this as they are using it as a marketing strategy to sign up vulnerable customers.

What are the further conditions that should be applied to deduction arrangements to further strengthen customer protections?

Require (and cap) target amounts. Only for specific products.

Does the agency's existing Centrepay resources and information available to customers clearly outline the customer authority process and customer's ongoing requirements to manage their deductions?

yes

CUSTOMER EXPERIENCE

How can the agency, and registered Centrepay businesses, better support customers when things go wrong?

Agency to refund vulnerable customers and take on the burden of seeking recompense from Centrepay business

What improvements could be made to the complaints management process for Centrepay customers?

Explicitly email or write to customers providing this information whenever a deduction is setup and, for ongoing deductions, at least annually

How can we better advertise and communicate the channels and avenues through which complaints can be made?

In the media

BUSINESS

What community expectations could be incorporated into assessing Centrepay registered businesses?

Value for money
Consumer protection

What risk factors should the agency consider in assessing a business for Centrepay registration?

History
Amounts likely to be deducted
That it may promote non essential goods and services and limit clients funds available for essentials
That it may create perceived endorsement of a business or product as necessary, good value or as endorsed by government

What, if any, additional conditions should be placed on businesses to ensure increased flexibility and protections for customers when considering the use of Centrepay as a payment method?

Ensure that fees and additional charges for alternative viable payment methods do not exceed Centrepay charges
Ensure a fee free refund option where goods have not yet been received
Ensure that layby, bookup and credit banking are covered by consumer protection

What flags would you expect the agency to be monitoring to trigger engagement with businesses in relation to their compliance with Centrepay policies?

Large numbers of remote, indigenous or disabled clients

Are there any business models that should be excluded from Centrepay and if so, what criteria should be used to consider their inclusion or exclusion?

Life, income and funeral insurance

Gym, health club memberships

COMPLIANCE

What information should be made available, to Centrepay customers and the public, regarding any compliance action taken by Services Australia against a Centrepay registered business?

Company name, type of offence, number of affected customers, targetting of vulnerable customers

OVERPAYMENTS

What information and further assistance would be useful to customers when an overpayment has occurred?

Allow immediate repayment via Centrelink to stop the delays

What factors are contributing to customers accumulating credit with businesses? And how can the agency better support customers to avoid overpayments with businesses?

Government energy cost of living rebates at the same time a Centrepay smoothpay payments