

27th September 2019

Committee Secretary
Senate Legal and Constitutional Affairs Committee
PO Box 6100
Parliament House
Canberra ACT 2600

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

Dear Committee Secretary,

NSSRN submission: *Inquiry into Centrelink's compliance program*

1. The National Social Security Rights Network (NSSRN) is a peak community organisation in the area of income support law, policy and administration. Our members are community legal centres across the country that provide free and independent legal assistance to people experiencing issues with social security and family assistance payments. The NSSRN draws on this front line experience in developing this submission and policy positions.
2. We welcome this opportunity to comment on Centrelink's compliance program (otherwise known as 'Robodebt').
3. The NSSRN has opposed Robodebt since its initial inception in 2016.¹ Some minor changes have been made to the administration of the system, largely focusing on improving communication with individuals and the user experience of the online employment income confirmation portal. However, these have not addressed the fundamental flaws. There has been no change to the erroneous method of calculating debts and the reverse burden of proof placed on the recipient to disprove the existence of the debt. These flaws in the process for raising the debts calls into question the legal basis for the resulting debts.
4. We have included case studies from our member community legal centres' clients to illustrate examples of common problems with the Robodebt system. In such cases, names and certain identifying information have been changed to protect the identities of our clients.
5. **We recommend that the system of averaging ATO reported annual income across fortnightly reporting periods immediately ceases.**
6. However, while the Robodebt system continues to operate, we recommend that in relation to debts raised as a result of Robodebt:
 - a. Individuals who receive Centrelink debt notices are given more information about the basis of the debt, including copies of their ADEX debt schedule setting out their alleged overpayments across each fortnightly payment period;
 - b. If there is insufficient evidence to prove the debt, that the Department refrains from raising a debt or taking any debt recovery action until such evidence is obtained by the Department using its power to request information directly from employers and financial institutions;
 - c. The recovery of old debts should not be pursued, especially where these debts allegedly accrued more than 6 years ago, particularly in cases where it is obvious that the person is of old age, suffering from ill health, living with disabilities, or in an obvious state of hardship;
 - d. The Robodebt system should not be used for people Centrelink has flagged as vulnerability indicated;
 - e. Compliance Officers, and external debt collection agencies chasing recovery of social security debts, should be trained in communicating with vulnerable people so they can demonstrate greater understanding and compassion when pursuing debts from vulnerable people;

¹ Please see our submission to the Senate Community Affairs References Committee dated 22 March 2017.

- f. Centrelink be adequately staffed with permanent employees trained in social security policy and procedure, and that any performance targets based on raising debts be abandoned; and
- 9. That the Government provide increased funding for community legal services to help meet the high demand for legal advice and assistance in this area

1 Impact on people receiving income support

- 1.1 Robodebt has ruined lives. The program has been linked to suicides and otherwise higher rates of deaths, with figures showing that approximately 2,030 people lost their lives after receiving a Robodebt letter.²
- 1.2 Most clients affected by these debts are at a loss and in shock — describing distress, anxiety and frustration using the system or receiving a debt notice generated by it.
- 1.3 Many people who are receiving Robodebt letters are members of vulnerable social groups, who are already experiencing complex intersections of disadvantage and risks of abuse. The mental distress and anguish caused by receiving a Robodebt letter, and the financial implications of paying an incorrectly calculated debt, create a real risk that the Robodebt program may further entrench social disadvantage.
- 1.4 In her book *Automating Inequality*, Virginia Eubanks describes how disadvantaged social groups, “bear a much heavier burden of monitoring, tracking, and social sorting than advantaged groups”.³ Her work discusses the level of surveillance and “digital social sorting” experienced by people who rely on social security payments. Eubanks writes of this experience in the USA, which is equally applicable to our current situation in Australia with Robodebt:

“Across the country, poor and working-class people are targeted by new tools of digital poverty management and face life-threatening consequences as a result. Automated eligibility systems discourage them from claiming public resources that they need to survive and thrive. Complex integrated databases collect their most personal information, with few safeguards for privacy or data security, while offering almost nothing in return. Predictive models and algorithms tag them as risky investments and problematic parents. Vast complexes of social service, law enforcement, and neighbourhood surveillance make their every move visible and offer up their behaviour for government, commercial, and public scrutiny.”

- 1.5 In addition to abandoning the automated debt calculation process, we recommend that all DHS officers, and external debt collection agencies chasing recovery of social security debts, are trained in communicating and working with vulnerable people so they can demonstrate greater understanding and compassion when pursuing debts from vulnerable people.
- 1.6 A specific issue is that the Robodebt process reverses the burden of proof. Where Centrelink’s flawed data-matching technique identifies a possible overpayment, a letter is sent to the person requiring them to obtain evidence of payslips or bank statements to prove that the debt calculation is inaccurate.
- 1.7 This unfairly shifts the burden to people who are already experiencing financial hardship and in vulnerable circumstances. The experience of our member centres is consistent with reporting that many such letters have been misunderstood or disregarded by their recipients, either because of confusing wording or because the recipient could not access years-old pay slips or bank statements to prove their income.⁴ It is noteworthy that

² The exact causes of death are not monitored by the Department of Human Services or other government agencies.

³ Virginia Eubanks, ‘The Digital Poorhouse’, Harper’s Magazine (online), January 2018 <https://harpers.org/archive/2018/01/the-digitalpoorhouse>.

⁴ Christopher Knaus, ‘Centrelink forced to wipe or change one in six robo-debts’, The Guardian (online), 14 February 2018, <https://www.theguardian.com/australia-news/2018/feb/14/centrelink-forced-to-wipe-or-reduce-one-in-six-robo-debts>.

Centrelink requires individuals to access records outside of the statutory record keeping timeframes for tax purposes.

- 1.8 The case study of Phil, our member's client, illustrates the unfairness of reversing the burden of proof:

Centrelink used the Robodebt process to raise a \$2,400 debt against Phil for the period 2010 – 2011. Phil was unable to provide bank statements or payslips from that period, when he had been working for a labour hire company that had gone into administration. Our member assisted Phil to contact the administrator who confirmed that the company had not provided information about the wages of particular employees.

Phil also had to obtain bank statements that would cost him \$45 – a sum he was unable to afford given his financial circumstances. Thankfully our member was able to assist Phil in seeking a waiver of these fees from the bank, and Phil is now waiting for Centrelink to correctly recalculate any debt amount.

- 1.9 This reversal of the burden of proof is particularly problematic given Centrelink's broad powers to recover debts – particularly through the use of garnishee powers that allow Centrelink to recover alleged debts from people's tax returns, wages, or other support payments. It is our view that, given the known inaccuracies of the Robodebt system, individuals should not have to bear the burden of disproving a debt in order to avoid having their payments garnished.
- 1.10 The reality is that most people affected by Robodebt will not have access to the same level of legal assistance that Phil did, will therefore be unable to disprove the alleged debt, and may be forced to pay Centrelink money that they do not actually owe. For someone reliant on income support to get by, any loss of income can have devastating consequences such as an increased risk of homelessness and exacerbated health issues.
- 1.11 As the onus of proving a debt legally remains on the Department of Human Services, we recommend that if there is insufficient evidence to prove the debt, that the Department refrains from raising a debt or taking any debt recovery action until such evidence is obtained by the Department using its power to request information directly from employers or financial institutions.

2 Deeply flawed data-matching techniques

- 2.1 Automated decision-making is only as good as the code that makes it run and the data that goes into it.⁵
- 2.2 The fundamental flaw with Robodebt is that the data matching process it relies on uses two sets of data produced using different calculation methods.
- 2.3 Robodebt compares income declaration data from the Australian Taxation Office (ATO) against income reported by people in receipt of social security payments. Where there are gaps in the information provided by such persons, Robodebt will fill in the gaps by averaging out the ATO reported annual income across the 26 fortnightly Centrelink employment reporting periods, or a shorter period if dates are provided – in other words it will treat income as if it was earned at a consistent rate over the total period rather than applying the precise amounts against the fortnights in which the income was actually earned.
- 2.4 This method of averaging suggests that a person has worked a consistent rate across an entire given period. In many cases, this method will incorrectly assume that a person has

⁵ See, for example, Simon Elvery, 'How algorithms make important government decisions — and how that affects you', ABC News (online), 21 July 2017, <http://www.abc.net.au/news/2017-07-21/algorithms-can-make-decisions-on-behalf-of-federal-ministers/8704858>.

been overpaid a social security entitlement during a payment fortnight as it suggests that a person has failed to report or underreported their income.

- 2.5 The ADEX Debt Schedule Report in *Appendix A*, obtained from Centrelink by one of our member centres on behalf of a client who had a Robodebt raised against them, illustrates this point. The schedule clearly shows that the client's income has been averaged over given periods, without taking into account periods for which they were not receiving Centrelink payments or the fact that they were working multiple jobs with inconsistent and fluctuating hours.
- 2.6 If, after receiving the initial letter from Centrelink, a person does not provide further information for any reason, Centrelink then makes a debt assessment based on this data-matching information alone. This is what happened to Maryanne, who sought assistance from one of our member centres:

Maryanne is 35 years old and currently works full-time, but when she was a student she held a series of casual jobs and over university holidays often found temporary full-time work. Centrelink used the Robodebt process to raise a \$10,700 debt against Maryanne dating from August 2014 to May 2016 — a period during which Maryanne held four different jobs, meaning her income went up and down each fortnight.

In fact for 10 months of the alleged debt period Maryanne was not receiving any Centrelink support payments, as she was able to work enough hours to support herself. Maryanne did not have access to her old pay slips, but it was highly likely the majority of the income Maryanne earned over the debt period was earned during the time she was not in receipt of any Centrelink support payments. However, her ADEX debt schedules obtained by an FOI request showed that Centrelink had averaged Maryanne's income over the entire debt period.

Our member centre assisted Maryanne in filing an appeal to the AAT, which exercised the powers under the Social Security Act to obtain payslips from Maryanne's former employer. These payslips confirmed that a significant amount of her income was in fact earned during the time she was not receiving any income support payments. The AAT has sent the debt back to Centrelink for recalculation.

- 2.7 Due to this flawed calculation method, many of our clients' debts have been revised down — including to \$0. It is reported that, between July 2016 and September 2017, one in six debts were wrongly calculated.⁶ Given the onus is on the individual to prove the debt amount is incorrect, and vulnerable people are less likely to have access to legal assistance services, it is likely that the percentage of wrongly calculated debts is in fact higher. It should not take an appeal to the AAT for Centrelink to use its powers in order to ensure it is calculating a debt correctly.
- 2.8 Centrelink's reliance on such a fundamentally flawed processes, using information known to be inadequate, undermines the legal basis on which it depends to lawfully raise debts. As Terry Carney, an Emeritus Professor of Law at the University of Sydney Law School, writes, there are four fundamental validity issues with the Robodebt system:

"First, s 1222A(a) of the Social Security Act 1991 states that there can only be a debt if another provision creates it. There is no relevant provision 'automatically' creating a debt just because data-matching shows a discrepancy, so Centrelink is obliged to establish that there is a difference between the amount paid and the amount to which a person was entitled (s 1223).

Second, rate entitlements for payments such as YA [Youth Allowance] and NSA [Newstart Allowance] must legally be determined each fortnight, taking into account any 'income bank' or other offsets and adjustments. And, just as rainfall in a given fortnight cannot be calculated by dividing the 'annual' figure by 26, nor can an

⁶ Christopher Knaus, 'Centrelink forced to wipe or change one in six robo-debts', The Guardian (online), 14 February 2018, <https://www.theguardian.com/australia-news/2018/feb/14/centrelink-forced-to-wipe-or-reduce-one-in-six-robo-debts>.

‘average’ from ATO records of earnings over many months or weeks speak to what was earned in particular fortnights. Indeed, correctly ascertained, supposed debts in the thousands of dollars evaporate entirely, or reduce to a few hundred dollars. That is why raising debts against vulnerable people on an average of their often multiple jobs with casual and fluctuating earnings is so morally bankrupt (or even ‘extortionate’).

Third, Centrelink bears the onus of marshalling sufficient material to show that the person was overpaid by reference to inaccuracies in the actual earnings in each of the particular fortnights in question. It must ‘enliven’ or set in motion the relevant debt creation section. It is simply impossible to read this part of the legislation any other way. Consequently, as determined by the Full Federal Court in McDonald v Director-General of Social Security [1984] FCA 59; 1 FCR 354, Centrelink is obliged to show some proofs. But unless it is a constant, an average never speaks to its constituent parts. So, aside from the rare case of a person having held just one job (and most robo-debts involve half a dozen or more) the rate of pay for which remained constant, extrapolation of fortnightly averages from ATO data is no material or relevant evidence at all; it is no more helpful than reciting the words of a football club theme song. But like the midnight TV adverts, legally speaking ‘there is still more’: when the issue to be decided is as grave as an allegation of debt, it attracts the High Court’s ‘Briginshaw’ principle. As Sir Owen Dixon put it in that case, ‘In such matters ‘reasonable satisfaction’ should not be produced in inexact proofs, indefinite testimony, or indirect inferences...’. Yet, at best, that is what Centrelink seeks to do.

Fourth, and finally, failure by Centrelink to marshal any or sufficient material results in there being no debt in law. This too was made plain in the McDonald case.”

- 2.9 We note that the lawfulness of the Robodebt program is currently being challenged in the Federal Court, and that a separate class action is being pursued on the grounds of unjust enrichment.
- 2.10 We recommend that the method of averaging ATO reported annual income data across the fortnightly payment periods, and comparing this with income reported to Centrelink, should immediately cease.

3 Inaccurate debts made without human oversight

- 3.1 Our member centres assist many people like Maryanne and Phil who have received debt notices and believe the debts have been inaccurately raised by the Robodebt system.
- 3.2 These debts would previously have been checked with greater human oversight of the debt calculation process. DHS officers were previously required to obtain any additional information necessary to accurately assess and calculate any possible debt owed, often obtaining it directly from employers or financial institutions by issuing a notice under social security legislation.
- 3.3 In April 2017, the Commonwealth Ombudsman conducted an investigation into Robodebt and made recommendations that there should be increased human intervention in the debt recovery process. Recent media reports have revealed that Centrelink Compliance Officers are tasked with resolving Robodebts, however their productivity is closely monitored and recorded. This raises concerns that the level of human intervention remains inadequate, as compliance officers report undue pressure to resolve as many debts as possible without consideration for the accuracy of these debts or the individuals targeted.
- 3.4 The reduction of human oversight raises questions about the quality of decisions made by the Robodebt system. This is especially important in the case of administrative law, which requires procedural fairness and accountability in respect of government decision-making concerning individuals.
- 3.5 While a review and appeals process that allows for inaccurate debts to be set aside exists, it is poor practice for Centrelink to retrospectively rely on this to correct factual errors made

by the Robodebt system - especially when it reverses the onus of proof and holds the forensic advantage over vulnerable individuals. Many vulnerable people are unable to access such review and appeals processes (which is consistent with the wider research into the responses of disadvantaged people dealing with legal problems).

- 3.6 To make the system fairer, individuals who receive Centrelink debt notices should be provided with more information about the basis of the debt, including copies of their debt schedule setting out their alleged overpayments across each fortnightly payment period.
- 3.7 In particular, notices must explain the process of averaging, and that if the individual does not provide further income information their income will be averaged evenly across the relevant period and any debts based on averaged ATO income may be less accurate — especially if they have intermittent or fluctuating income or were not receiving Centrelink payments for a period of the alleged debt.
- 3.8 Furthermore, the recovery of old debts should not be pursued, especially where these debts are alleged to have accrued more than 5 years ago, and particularly where it is obvious that the person is of old age, suffering from ill health with disabilities or in an obvious state of hardship.

4 Inadequacy of Centrelink staffing levels

- 4.1 We can only comment on the reductions in Centrelink staffing levels which have been publicly reported and the impact this has had on service delivery, specifically the ability of the Department of Human Services to respond to people who receive a debt notice.
- 4.2 In the past financial year, approximately 80 Centrelink staff jobs were removed. A further 3,000 jobs cuts across Commonwealth agencies (including Centrelink) are expected by 2023, as part of the Government's \$1.5 billion planned reduction in public service expenses.⁷
- 4.3 We are concerned about the impact of this reduction in Centrelink staffing levels on the vulnerable people we serve, particularly when combined with the pressure of productivity targets for Centrelink compliance officers to resolve as many debts as possible.
- 4.4 According to whistle-blowers, compliance staff are ranked on their ability to finalise cases. The staff are apparently required to finalise five cases a day and instructed to do everything possible to accelerate the debt raising process. The system of performance targets is designed to publicly shame staff into meeting or exceeding targets and encourages a culture of bending the rules.⁸
- 4.5 If the compliance officer could not contact a customer on two occasions, then the averaging process (discussed above) was triggered. If the process showed a debt, then a notification letter would be sent and the case finalised.⁹
- 4.6 These performance targets have led to issues with triggering the averaging process through corner cutting, such as by calling people for one or two rings and then hanging up.
- 4.7 If a staff member did not meet their targets, they would be on performance review for a month before being dismissed for not meeting finalisation requirements.¹⁰

⁷ Sally Whyte, 'After chasing Centrelink debts, Human Services cuts jobs in focus area', *Sydney Morning Herald* (online, 7 September 2018) <<https://www.theguardian.com/australia-news/2018/feb/14/centrelink-forced-to-wipe-or-reduce-one-in-six-robo-debts>>; Georgia Clark, 'Re-elected Coalition to slash \$1.5b from public service', *Government News* (online, 20 May 2019) <<https://www.governmentnews.com.au/re-elected-coalition-to-slash-1-5b-from-public-service>>.

⁸ Emily McPherson and Jonathan Kearsley, "'Whiteboard of shame': Robo-debt compliance officers "worked to targets"', *The Sydney Morning Herald* (online, 9 August 2019) <<https://www.smh.com.au/politics/federal/whiteboard-of-shame-robo-debt-compliance-officers-worked-to-targets-20190809-p52f0g.html>>.

⁹ Ibid.

¹⁰ Ibid.

- 4.8 Centrelink's use of nearly 3,000 call centre contractors has done little to alleviate these problems.¹¹
- 4.9 Contractors are inadequately trained and often end up providing incorrect information and making errors as they grapple with the complexity of welfare policy and procedures.¹²
- 4.10 The provision of incorrect or inadequate information has a knock on effect of issues taking weeks to resolve, with multiple interactions being required to properly address a person's problem. This can mean people are enduring months of distress before resolving any issues caused by Robodebt's erroneous initial calculations.¹³
- 4.11 We recommend that Centrelink be adequately staffed with permanent employees trained in social security policy and procedure, and that any performance targets based on raising debts be abandoned.

5 Review and appeals process for debt notices

- 5.1 Recent reports have revealed that more than 77,500 Robodebts have been reduced, waived or written off by the Department of Human Services.¹⁴
- 5.2 However our member centres express concern that many disadvantaged and vulnerable people will simply accept their alleged Robodebt as accurate and pay it because they are fearful of what may happen if they do not pay. Many of these people are unaware or do not have access to legal assistance to help them navigate the appeals process. Moreover, some people may not realise that the debt may have been incorrectly calculated by the Robodebt system and therefore may not take action to correct it.
- 5.3 Our member centres have assisted many people to resolve their debt notices with Centrelink, however we remain aware of considerable unmet legal need in this area. Many people, especially those in vulnerable social groups, have not been afforded the opportunity to obtain legal advice about their right to reassessment or review. Many of our clients are referred to our member centres from community workers, however not all vulnerable people have access to these support networks.
- 5.4 This was the experience of a member centre client named Hailey:

Hailey had developed a serious and persistent mental health problem, including anxiety, and took leave from work while accessing support from a community service for people with mental health conditions. When her leave ran out, she claimed sickness allowance.

Late last year she received Robodebt notices from Centrelink, but was unable to respond to them due to her anxiety. Centrelink then raised a debt against Hailey and began to recover it at its standard 15% rate of withholdings from her sickness allowance.

Hailey was in hardship but felt unable to ask Centrelink to reduce her repayments, even though she thought the debt was wrong because it related to income she earned before she began receiving sickness allowance. She eventually told her support worker about this, who got in touch with our member centre who began the process of helping her have the debt set aside.

- 5.5 Unfortunately, many vulnerable people do not have the legal or casework support that enabled Hailey to resolve her debt with Centrelink. This is exacerbated by the sheer scale

¹¹ Doug Dingwall, 'Contractors are giving wrong information: Centrelink staff', *The Sydney Morning Herald* (online, 12 March 2019) <<https://www.smh.com.au/politics/federal/contractors-are-giving-wrong-information-centrelink-staff-20190307-p512c0.html>>.

¹² Ibid; Community and Public Sector Union, 'Our social security system under attack: Centrelink & Medicare privatisation report' (Report, November 2018).

¹³ Community and Public Sector Union, 'Our social security system under attack: Centrelink & Medicare privatisation report' (Report, November 2018).

¹⁴ <https://www.abc.net.au/triplej/programs/hack/more-than-77500-centrelink-robodebts-waived-or-reduced/10948942>

of the Robodebt program coupled with inadequate resourcing of specialist legal services, which means that services like those of our member centres are unable to meet the demand for legal assistance. Simply stated, this means more and more people do not have the support they require to challenge inaccurate debts.

- 5.6 We recommend Centrelink refrain from raising a debt or taking any debt recovery action until they have obtained sufficient and accurate evidence of actual income earned over individual fortnightly reporting periods, and should refrain from shifting the burden of proof onto individuals to disprove estimated debts.
- 5.7 We further recommend that the Government provide increased funding for community legal services to help meet the high demand for legal advice and assistance in this area.

Contact for this submission

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APPENDIX A

①

Name: [REDACTED]
 CRN: [REDACTED]
 Debt ID: [REDACTED]
 Pay Type YST

Paid \$ 31,625.05
 Entitled \$ 17,247.27
 Overpaid \$ 14,377.78

Employer A: [REDACTED]
 Employer B: [REDACTED]
 Employer C: [REDACTED]
 Employer D: [REDACTED]
 Employer E: [REDACTED]
 Employer F: [REDACTED]
 Employer G: [REDACTED]
 Employer H: [REDACTED]

ADEX Debt Schedule Report

Version 20160218.1304

						Customer			
Benefit Fortnight Start	Benefit Fortnight End	Amount Paid	Amount Entitled	Amount Overpaid	Method of Reporting	Declared Income	Apportioned Actual Income	Actual Income as per Payslips	Employer
26 Aug 2013	30 Aug 2013	\$ 150.61	\$ 31.96	\$ 118.64		\$ 531.48	\$ 1,085.14		AB
31 Aug 2013	13 Sep 2013	\$ 169.54	\$ 89.50	\$ 80.05		\$ 951.73	\$ 1,085.14		AB
14 Sep 2013	27 Sep 2013	\$ 480.37	\$ 89.88	\$ 390.49		\$ 424.00	\$ 1,085.14		AB
28 Sep 2013	11 Oct 2013	\$ 429.34	\$ 90.17	\$ 339.17		\$ 519.86	\$ 1,085.14		AB
12 Oct 2013	25 Oct 2013	\$ 346.44	\$ 90.17	\$ 256.27		\$ 658.02	\$ 1,085.14		AB
26 Oct 2013	08 Nov 2013	\$ 173.79	\$ 90.17	\$ 83.62		\$ 945.77	\$ 1,085.14		AB
09 Nov 2013	22 Nov 2013	\$ 328.59	\$ 90.17	\$ 238.42		\$ 687.78	\$ 1,085.14		AB
23 Nov 2013	06 Dec 2013	\$ 301.40	\$ 90.17	\$ 211.22		\$ 733.10	\$ 1,085.14		AB
07 Dec 2013	20 Dec 2013	\$ 357.44	\$ 90.17	\$ 267.27		\$ 639.69	\$ 1,085.14		AB
21 Dec 2013	03 Jan 2014	\$ 173.52	\$ 94.48	\$ 79.04		\$ 953.41	\$ 1,085.14		AB
04 Jan 2014	17 Jan 2014	\$ -	\$ 110.28	\$ (110.28)		\$ 1,493.00	\$ 1,085.14		AB
18 Jan 2014	31 Jan 2014	\$ 64.16	\$ 110.28	\$ (46.12)		\$ 1,162.00	\$ 1,085.14		AB
01 Feb 2014	14 Feb 2014	\$ 64.16	\$ 110.28	\$ (46.12)		\$ 515.52	\$ 1,085.14		AB
15 Feb 2014	28 Feb 2014	\$ 223.25	\$ 110.28	\$ 112.97		\$ 896.85	\$ 1,085.14		AB
01 Mar 2014	14 Mar 2014	\$ 213.54	\$ 110.28	\$ 103.26		\$ 913.04	\$ 1,085.14		AB
15 Mar 2014	28 Mar 2014	\$ 100.59	\$ 111.30	\$ (10.72)		\$ 1,103.00	\$ 1,085.14		AB
29 Mar 2014	11 Apr 2014	\$ 367.60	\$ 111.87	\$ 255.73		\$ 658.93	\$ 1,085.14		AB
12 Apr 2014	25 Apr 2014	\$ -	\$ 111.87	\$ (111.87)		\$ 1,478.00	\$ 1,085.14		AB
26 Apr 2014	09 May 2014	\$ 289.61	\$ 111.87	\$ 177.74		\$ 788.91	\$ 1,085.14		AB
10 May 2014	23 May 2014	\$ 458.22	\$ 111.87	\$ 346.35		\$ 507.89	\$ 1,085.14		AB
24 May 2014	06 Jun 2014	\$ 240.26	\$ 111.87	\$ 128.39		\$ 871.16	\$ 1,085.14		AB
07 Jun 2014	20 Jun 2014	\$ 437.51	\$ 111.87	\$ 325.63		\$ 542.42	\$ 1,085.14		AB
21 Jun 2014	04 Jul 2014	\$ 183.61	\$ 183.61	\$ -					
05 Jul 2014	18 Jul 2014	\$ 65.16	\$ 65.16	\$ -					
19 Jul 2014	01 Aug 2014	\$ 318.78	\$ 318.78	\$ -					
02 Aug 2014	15 Aug 2014	\$ 104.76	\$ 104.76	\$ -					
16 Aug 2014	29 Aug 2014	\$ 133.83	\$ 133.83	\$ -					
30 Aug 2014	12 Sep 2014	\$ 213.74	\$ 213.74	\$ -					
13 Sep 2014	26 Sep 2014	\$ 181.96	\$ 181.96	\$ -					
27 Sep 2014	10 Oct 2014	\$ 506.47	\$ 506.47	\$ -					
11 Oct 2014	24 Oct 2014	\$ 506.47	\$ 506.47	\$ -					
25 Oct 2014	07 Nov 2014	\$ 506.47	\$ 506.47	\$ -					
08 Nov 2014	21 Nov 2014	\$ 506.47	\$ 506.47	\$ -					
22 Nov 2014	05 Dec 2014	\$ 506.47	\$ 506.47	\$ -					
06 Dec 2014	19 Dec 2014	\$ 506.47	\$ 506.47	\$ -					
20 Dec 2014	02 Jan 2015	\$ 508.24	\$ 508.24	\$ -					
03 Jan 2015	16 Jan 2015	\$ 238.65	\$ 238.65	\$ -					
17 Jan 2015	30 Jan 2015	\$ 497.17	\$ 497.17	\$ -					
31 Jan 2015	13 Feb 2015	\$ 518.87	\$ 518.87	\$ -					
14 Feb 2015	27 Feb 2015	\$ 518.87	\$ 518.87	\$ -					
28 Feb 2015	13 Mar 2015	\$ 483.10	\$ 483.10	\$ -					
14 Mar 2015	27 Mar 2015	\$ 467.70	\$ 467.70	\$ -					
28 Mar 2015	10 Apr 2015	\$ -	\$ -	\$ -					
11 Apr 2015	24 Apr 2015	\$ 453.34	\$ 453.34	\$ -					
25 Apr 2015	08 May 2015	\$ 277.84	\$ 277.84	\$ -					
09 May 2015	22 May 2015	\$ 519.40	\$ 519.40	\$ -					
23 May 2015	05 Jun 2015	\$ 519.40	\$ 519.40	\$ -					
06 Jun 2015	19 Jun 2015	\$ 519.40	\$ 519.40	\$ -					
20 Jun 2015	03 Jul 2015	\$ -	\$ -	\$ -					
04 Jul 2015	17 Jul 2015	\$ 33.49	\$ 155.49	\$ (122.00)		\$ 1,251.00	\$ 1,047.67		CD
18 Jul 2015	31 Jul 2015	\$ -	\$ 155.49	\$ (155.49)		\$ 2,465.98	\$ 1,047.67		CD
01 Aug 2015	14 Aug 2015	\$ 159.24	\$ 155.49	\$ 3.76		\$ 1,041.41	\$ 1,047.67		CD
15 Aug 2015	28 Aug 2015	\$ -	\$ 155.49	\$ (155.49)		\$ 2,550.00	\$ 1,047.67		CD
29 Aug 2015	11 Sep 2015	\$ -	\$ 155.49	\$ (155.49)		\$ 2,067.00	\$ 1,047.67		CD
12 Sep 2015	25 Sep 2015	\$ 144.77	\$ 155.77	\$ (11.00)		\$ 1,066.00	\$ 1,047.67		CD
26 Sep 2015	09 Oct 2015	\$ 280.32	\$ 156.16	\$ 124.16		\$ 840.73	\$ 1,047.67		CD
10 Oct 2015	23 Oct 2015	\$ 513.01	\$ 156.16	\$ 356.86		\$ 441.09	\$ 1,047.67		CD
24 Oct 2015	06 Nov 2015	\$ 520.07	\$ 156.16	\$ 363.91		\$ 253.85	\$ 1,047.67		CD

Name [REDACTED]
 CRN [REDACTED]
 Debt ID [REDACTED]
 Pay Type YST

Paid \$ 31,825.05
 Entitled \$ 17,247.27
 Overpaid \$ 14,377.78

Employer A [REDACTED]
 Employer B [REDACTED]
 Employer C [REDACTED]
 Employer D [REDACTED]
 Employer E [REDACTED]
 Employer F [REDACTED]
 Employer G [REDACTED]
 Employer H [REDACTED]

ADEX Debt Schedule Report

Version 20160218.1304

Benefit Fortnight Start	Benefit Fortnight End	Amount Paid	Amount Entitled	Amount Overpaid	Method of Reporting	Customer			Employer
						Declared Income	Apportioned Actual Income	Actual Income as per Payslips	
07 Nov 2015	20 Nov 2015	\$ 520.07	\$ 156.16	\$ 363.91		\$ 375.19	\$ 1,047.67		CD
21 Nov 2015	04 Dec 2015	\$ 520.07	\$ 156.16	\$ 363.91		\$ 457.46	\$ 1,047.67		CD
05 Dec 2015	18 Dec 2015	\$ 520.07	\$ 156.16	\$ 363.91		\$ 415.43	\$ 1,047.67		CD
19 Dec 2015	01 Jan 2016	\$ 483.53	\$ 156.88	\$ 326.65		\$ 707.39	\$ 1,047.67		CD
02 Jan 2016	15 Jan 2016	\$ 291.36	\$ 166.26	\$ 125.10		\$ 839.17	\$ 1,047.67		CD
16 Jan 2016	29 Jan 2016	\$ 442.32	\$ 166.26	\$ 276.07		\$ 587.56	\$ 1,047.67		CD
30 Jan 2016	12 Feb 2016	\$ 526.47	\$ 52.86	\$ 473.61		\$ 427.50	\$ 1,236.67		CDE
13 Feb 2016	26 Feb 2016	\$ 1,551.47	\$ -	\$ 1,551.47		\$ 237.40	\$ 1,388.67		CDE
27 Feb 2016	11 Mar 2016	\$ 526.47	\$ -	\$ 526.47		\$ 279.16	\$ 2,226.30		CDF
12 Mar 2016	25 Mar 2016	\$ 526.75	\$ -	\$ 526.75		\$ 369.72	\$ 2,422.74		CDF
26 Mar 2016	08 Apr 2016	\$ 527.13	\$ -	\$ 527.13		\$ 138.00	\$ 2,560.74		CDFG
09 Apr 2016	22 Apr 2016	\$ 527.13	\$ -	\$ 527.13		\$ 614.70	\$ 2,422.74		CDF
23 Apr 2016	06 May 2016	\$ -	\$ -	\$ -		\$ 2,259.32	\$ 2,468.17		CDFG
07 May 2016	20 May 2016	\$ -	\$ -	\$ -		\$ 2,805.00	\$ 2,422.74		CDF
21 May 2016	03 Jun 2016	\$ -	\$ -	\$ -		\$ 2,366.46	\$ 2,422.74		CDF
04 Jun 2016	17 Jun 2016	\$ -	\$ -	\$ -		\$ 2,054.00	\$ 2,632.74		CDFG
18 Jun 2016	01 Jul 2016	\$ -	\$ -	\$ -		\$ 2,024.00	\$ 1,747.84		CFG
02 Jul 2016	15 Jul 2016	\$ -	\$ 241.92	\$ (241.92)		\$ 1,804.40	\$ 922.66		CFG
16 Jul 2016	27 Jul 2016	\$ -	\$ -	\$ -		\$ -	\$ 922.66		CFG
28 Jul 2016	10 Aug 2016	\$ -	\$ -	\$ -		\$ -	\$ 922.66		CFG
11 Aug 2016	24 Aug 2016	\$ -	\$ -	\$ -		\$ -	\$ 922.66		CFG
25 Aug 2016	07 Sep 2016	\$ -	\$ -	\$ -		\$ -	\$ 922.66		CFG
08 Sep 2016	21 Sep 2016	\$ -	\$ -	\$ -		\$ -	\$ 922.66		CFG
22 Sep 2016	05 Oct 2016	\$ -	\$ -	\$ -		\$ -	\$ 922.66		CFG
06 Oct 2016	19 Oct 2016	\$ 188.31	\$ 86.45	\$ 101.86		\$ -	\$ 922.66		CFG
20 Oct 2016	02 Nov 2016	\$ 527.27	\$ 242.07	\$ 285.20		\$ -	\$ 922.66		CFG
03 Nov 2016	16 Nov 2016	\$ 446.42	\$ 161.22	\$ 285.20		\$ 452.92	\$ 922.66		CFG
17 Nov 2016	30 Nov 2016	\$ 440.20	\$ 155.00	\$ 285.20		\$ 855.00	\$ 922.66		CFG
01 Dec 2016	14 Dec 2016	\$ 345.22	\$ 155.00	\$ 190.21		\$ 605.64	\$ 922.66		CFG
15 Dec 2016	28 Dec 2016	\$ 345.22	\$ 155.00	\$ 190.21		\$ 345.00	\$ 922.66		CFG
29 Dec 2016	11 Jan 2017	\$ 423.22	\$ 160.35	\$ 262.88		\$ 360.00	\$ 922.66		CFG
12 Jan 2017	25 Jan 2017	\$ 305.07	\$ 161.81	\$ 143.27		\$ 848.02	\$ 922.66		CFG
26 Jan 2017	08 Feb 2017	\$ 444.50	\$ 161.81	\$ 282.70		\$ 243.40	\$ 922.66		CFG
09 Feb 2017	22 Feb 2017	\$ 444.50	\$ 161.81	\$ 282.70		\$ -	\$ 922.66		CFG
23 Feb 2017	08 Mar 2017	\$ 444.50	\$ 161.81	\$ 282.70		\$ 659.00	\$ 922.66		CFG
09 Mar 2017	22 Mar 2017	\$ 444.50	\$ 161.81	\$ 282.70		\$ 587.41	\$ 922.66		CFG
23 Mar 2017	05 Apr 2017	\$ 444.50	\$ 161.81	\$ 282.70		\$ 571.50	\$ 922.66		CFG
06 Apr 2017	19 Apr 2017	\$ 444.50	\$ 161.81	\$ 282.70		\$ 552.00	\$ 922.66		CFG
20 Apr 2017	03 May 2017	\$ 444.50	\$ 194.76	\$ 249.74		\$ 414.00	\$ 867.74		CFG
04 May 2017	17 May 2017	\$ 425.85	\$ 207.07	\$ 218.77		\$ 506.00	\$ 847.21		FGH
18 May 2017	31 May 2017	\$ 431.50	\$ -	\$ 431.50		\$ 463.00	\$ 1,532.16		FGH
01 Jun 2017	14 Jun 2017	\$ 444.50	\$ -	\$ 444.50		\$ 419.18	\$ 1,532.16		FGH
15 Jun 2017	28 Jun 2017	\$ 444.50	\$ -	\$ 444.50		\$ 403.00	\$ 1,532.16		FGH
26 Aug 2013	28 Jun 2017	\$ 31,825.05	\$ 17,247.27	\$ 14,377.78		\$ 56,999.55	\$ 89,237.51		