



Scam Reduction
Australian Communications and Media Authority

By email: senderIDregister@acma.gov.au

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Economic Justice Australia submission on the SMS ID register standards

About Economic Justice Australia

Economic Justice Australia (EJA) is the peak organisation for community legal centres providing specialist advice to people on their social security issues and rights. Our members across Australia have provided people with free and independent information, advice, education and representation in the area of social security for over 40 years.

EJA provides expert advice to government on social security reform to make it more effective and accessible. Our law and policy reform work:

- o strengthens the effectiveness and integrity of our social security system
- o educates the community
- o improves people's lives by reducing poverty and inequality.

Introduction

EJA welcomes this consultation by the Australian Communications and Media Authority to elicit views to inform the design, implementation and operation of a new register to ensure compliance of SMS ID providers with appropriate standards.

While EJA does not have technical expertise to comment on the discussion paper in detail, this brief submission addresses the pressing need for systems that provide greater safety and certainty for those engaging with government services. This submission relates specifically to access to social security payments administered by Services Australia through Centrelink.

Notification of pending phone contact

Calls from Services Australia do not have caller ID and are displayed as a 'private number'. Services Australia has provided informal feedback to EJA that this is to minimise the opportunity for scammers to exploit people's trust in caller ID by falsely registering scam phone numbers as 'Services Australia' or 'Centrelink'.

In many instances, Services Australia will notify a person of a pending phone call by SMS to increase the likelihood of them taking the call and disclosing relevant information to the Services Australia officer. These SMSs do not have caller ID, but include text that says: 'A Services Australia Officer will call you today from a private number. Please answer this call.'

Some canny clients have worked out that this number can be saved in their phones as 'Centrelink' (or equivalent), and that this caller ID will then display when they receive subsequent calls. It is EJA's understanding, however, that these numbers are not searchable on their phones using the saved name. Saving the number is currently not an option recommended or promoted by Services Australia.

Ideally, calls from Services Australia would have caller ID (with scam numbers blocked), but in the interim caller ID for SMSs would be useful to increase people's confidence in both the SMS and the call that follows.

Additional issues for people experiencing family and domestic violence

Victim-survivors of family and domestic violence (FADV) may be particularly wary of SMS or phone contact and may screen incoming calls, ignoring those that are not from a trusted contact.

Services Australia has specific measures in place to assist people experiencing FADV but Centrelink workers, including social workers, contact people experiencing FADV from private numbers without exception. EJA member experience, and recent EJA research with a diverse range of community workers throughout Australia, makes clear that this practice undermines victim-survivors' access to social security.

The callback calls from Centrelink are always private numbers. Women in domestic violence situations are terrified and they don't answer, and they are not going to answer private numbers for their own safety.

SMS notifications are not always received or are sometimes received after a call, particularly in areas with poor coverage, including regional and remote areas.

Even when we request that Centrelink send a text before they call the client – they either don't or it's never consistent. We often get women who get the text a day or half a day after the scheduled call.

It is not unusual for a perpetrator of domestic violence to monitor a victim-survivor's use of their devices and associated technology. So conversely Caller ID showing the call is from Centrelink may be useful if a perpetrator is triggered by the person receiving a call from a private number. Conversely, EJA sees merit in having SMSs and phone calls from Centrelink listed as 'private number' when a victim-survivor is trying to conceal their contact with Centrelink from a coercive partner, noting sometimes, that will be a person trying to establish their social security entitlement so they can leave a violent relationship. An opt-out scheme

would likely be fit for purpose. Therefore, there is merit in providing opt-out options for contacts from Services Australia that may be received in sensitive circumstances.

Vulnerability to scams

Services Australia has allocated significant resources to minimise the potential for scammers to use Centrelink or Services Australia as a fake identity to enable their operations. Despite that, such scam attempts are common and present a serious threat, noting approximately 8.5 million people engaged with Centrelink and 27.1 million people engaged with Medicare (also administered by Services Australia) in the 2023-24 financial year.

EJA supports all efforts to minimise risk of social security recipients, who are often in vulnerable circumstances, becoming the subject of scams. Consequently, we are supportive of the proposed register that would minimise the risk of impersonation tactics by identifying SMSs from non-registered providers as 'probable scam', while further consideration takes place around potential powers to block such SMSs.

➤ Contact associated with program integrity

Recently, EJA has engaged with Services Australia and the Department of Social Services regarding efforts to contact a large group of social security recipients to verify the reasons they are not receiving the full rate of Family Tax Benefit possibly available to them. It is EJA's understanding that this process has been undermined by difficulties contacting those targeted, including people not responding to direct contact.

It is essential that the government has a means to contact people regarding their social security entitlement, including when relevant to large-scale projects or programs, with a normalised SMS caller ID likely to improve the current process.

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