

Social Security for
Women Outside Our Cities

Service Delivery Barriers

May 2025



Economic Justice Australia would like to thank the many people and organisations who supported and collaborated on this research report.

The research for this report took place right across Australia, on unceded Aboriginal and Torres Strait Islander lands. Economic Justice Australia acknowledges and pays respects to Elders throughout Australia, past and present. We recognise First Nations peoples have always had a voice and solutions to ensure self-determination, and we affirm First Nations peoples' continuing leadership in creating just and sustainable solutions for their communities.

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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 more than 40 years.

EJA members provide expert social security legal advice to thousands of people all over Australia each year. Through their daily casework, our members see how social security is delivered to people in diverse situations and settings. This evidence-based practice is a foundation of EJA's policy and advocacy work, facilitating the identification of new and/or systemic issues that create barriers to people's access to their social security entitlements.

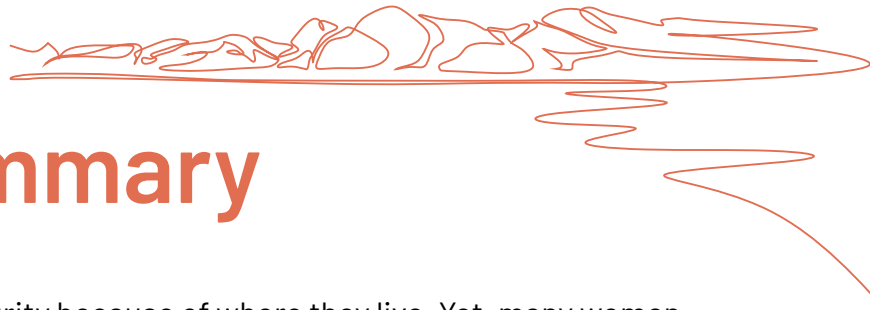
EJA's advocacy aims to make the social security system more effective and accessible. This work:

- Strengthens the effectiveness and integrity of our social security system
- Educates the community
- Improves people's lives by reducing poverty and inequality.

This report would not have been possible without the contribution of EJA members' expertise and vast casework experience.

EJA member centres

Basic Rights Queensland	Mid North Coast Legal Centre
Barwon Community Legal Centre	Monash Law Clinics Victoria
Canberra Community Law	Northern Australian Aboriginal Justice Agency
Central Australian Women's Legal Service	North Australian Aboriginal Family Legal Service
Darwin Community Legal Centre	Social Security Rights Victoria
Fremantle Community Legal Centre	Sussex Street Community Law Service
Hobart Community Legal Service	Top End Women's Legal Service
Illawarra Legal Centre	Townsville Community Law
Katherine Women's Information & Legal Service	Uniting Communities Law Centre
Kimberley Community Legal Services	Welfare Rights Centre (NSW)
Launceston Community Legal Centre	Welfare Rights & Advocacy Service (WA)



Executive Summary

No one should be excluded from social security because of where they live. Yet, many women outside Australia's major cities struggle to navigate systemic issues that prevent them from accessing and maintaining essential social security payments. These women, and the issues they face, are diverse: a mother in the Kimberley unable to verify her identity to Services Australia because she can't afford her birth certificate; a victim-survivor of family violence in Central Queensland who can't access online services due to poor internet connectivity; a woman in rural Tasmania caring for her elderly parent, facing a six-month wait for Services Australia to review an incorrect decision.

Women in regional, rural, remote and very remote (4R) Australia face a host of challenges particular to their locations. Compared to their city counterparts, they are more likely to be primary caregivers, have lower workforce participation rates, and experience higher rates of domestic violence. They also face restricted access to essential support services, arising from various obstacles that are unknown to or misunderstood by policymakers and those living in cities. These and other systemic inequities are amplified when access to social security is restricted, noting some women in 4R Australia are being denied their fundamental right to social security entitlements as the result of physical, digital, social and cultural barriers.

In 2023, EJA commenced research to better understand concerns raised by our member centres about recurring issues undermining access to social security for women in 4R Australia. The research process included desk reviews of relevant data and an extensive consultation process that involved more than 160 community workers from 96 diverse service providers nationwide.

EJA's research shows how social security law, policy and service delivery intersect with the gendered nature of women's experience, including as parents, as carers of people who are ill or have a disability, and as a demographic disproportionately represented in family and domestic violence statistics.

A robust social security system is a foundation of Australian society, and it is a responsibility of government to ensure all people have access to support when they need it. While a functioning social security system relies on appropriately targeted legislation and policy, it cannot be delivered without effective administration, including service provision to ensure people can access their entitlements, ongoing communication to ensure payments remain correct, and access to administrative review wherever a person believes a decision is unfair or incorrect.

This report is the first of a three-part series on 'Social Security for Women Outside Our Cities'. Key findings from this first report include:

1. Face-to-face services remain critical for many women in 4R Australia, yet there are significant barriers to access, including when face-to-face services are not available or where women have complex needs or face multiple obstacles to access.

2. The rapid shift toward digital services has delivered greater convenience for many while creating substantial challenges for others, including women experiencing digital exclusion due to poor connectivity, limited digital literacy, and an inability to afford devices and data. Lack of digital access is leading to payment delays, overpayments, and payment suspensions or cancellations.
3. Phone services are undermined by extensive wait times, call dropouts, and automated systems, which can delay or prevent women from accessing their social security entitlements.
4. Proof of identity requirements, while necessary for system integrity, can effectively lock women out of their entitlements when they cannot access or afford the required documents. Some women are more likely to face obstacles to satisfying proof of identify requirements, for reasons that are explored in-depth in this report. These cohorts include First Nations women, victim-survivors of family and domestic violence, young women, migrant women, transgender women, and women leaving institutions such as prison.
5. Internal review processes are hampered by low awareness of review rights, lengthy delays, and decisions that often fail to account for the realities of 4R living. Internal review systems appear chronically under-resourced given extensive wait times for Authorised Review Officer (ARO) reviews and sometimes poor-quality decisions, leaving many women in limbo and many others with poor outcomes.
6. External review through the Administrative Review Tribunal (ART) is hampered by accessibility challenges due to geographic isolation and limited understanding of regional contexts. Technology limitations and poor digital infrastructure in 4R areas prevent effective servicing, leaving many women unable to meaningfully participate in phone or video hearings. The absence of an ART registry in the Northern Territory makes it particularly difficult for women to access the administrative review system.
7. Social security legal assistance services are generally highly valued by service providers in 4R Australia as trusted experts and advocates. However, social security legal services are chronically underfunded, particularly in 4R areas where service delivery costs are higher, and recruitment is more challenging. The complexity of social security law, the fact that funding arrangements are limited and short-term, and the difficulty in recruiting and retaining experienced social security lawyers culminate in profound resource constraints. Adequate, dedicated baseline funding for social security legal services is desperately needed.

These issues demand urgent attention to ensure that women are not excluded from Australia's social security system due to their geographic location. Throughout this report, EJA makes recommendations for systemic change to better serve 4R Australia. These recommendations align with the first recommendation of the Robodebt Royal Commission, which is that Services Australia design policies and processes with emphasis on the people they are meant to serve.

Recommendations

Chapter 1: Access to face-to-face services

Adequate and accessible face-to-face services

Recommendation 1: That Services Australia allocate additional resourcing to improve access to face-to-face servicing in Service Centres (consistent with Robodebt Royal Commission recommendation 13.3).

Recommendation 2: That Services Australia identify communities with high need for face-to-face services and allocate additional resourcing for face-to-face services to these areas.

Recommendation 3: That Services Australia ensure frontline staff are trained to identify and assist those who struggle with digital access.

Recommendation 4: That Services Australia create private spaces for phone calls when in-person support is not immediately available.

Recommendation 5: That the Federal Government invest in digital inclusion programs to improve digital infrastructure, affordability and literacy, prioritising those who are digitally excluded, particularly in 4R areas.

Recommendation 6: That the Federal Government expand funded positions within community sector organisations to assist people to access and navigate digital interfaces.

Private consultation spaces in Service Centres

Recommendation 7: That Services Australia increase availability of safe, private interview spaces at Service Centres.

Recommendation 8: That Services Australia regularly seek input from service users ('customers') and community organisations on their privacy concerns and experiences, and design Service Centres guided by that input.

Recommendation 9: That Services Australia improve training for frontline staff on the importance of privacy and how to handle sensitive conversations discreetly.

Well-trained and responsive frontline staff

Recommendation 10: That Services Australia implement a 'No Wrong Door' policy, including guiding people to appropriate assistance rather than turning people away, and establish clear pathways for escalating complex cases to more experienced staff or specialised support services.

Recommendation 11: That Services Australia train and support frontline workers and social workers to make proactive referrals to external local support services.

Recommendation 12: That Services Australia support frontline workers and social workers to

attend local interagency network meetings, and provide local support service with direct contact details.

Recommendation 13: That Services Australia support and train frontline workers to provide plain language explanations.

Recommendation 14: That Services Australia improve staff support and training on sensitive and complex situations, including training about family and domestic violence, First Nations cultural competence and LGBTQI competence.

Recommendation 15: That Services Australia integrate basic mental health training for frontline staff to assist distressed clients, and establish partnerships with local mental health services for quick referrals when needed.

Recommendation 16: That Services Australia create protocols for respectful interaction with transgender service users, including using preferred names regardless of legal status.

Safe and inclusive Service Centres

Recommendation 17: That Services Australia ensure customer and community organisation input into future security and security-related reviews, policies and procedures.

Recommendation 18: That Services Australia ensure security guards are trained to interact with customers in a productive and sensitive manner, with the skills to de-escalate situations wherever possible.

Recommendation 19: That Services Australia regularly provide comprehensive training for all staff on de-escalation techniques, cultural sensitivity, and trauma-informed care to reduce reliance on physical security measures.

Readily available social worker support

Recommendation 20: That Services Australia increase face-to-face social worker services within Service Centres, taking into account the importance of their support role.

Community-integrated Service Centre staff

Recommendation 21: That Services Australia increase the capacity of outreach services to provide face-to-face support in 4R areas.

Recommendation 22: That Services Australia participate in local community events to provide face-to-face access in remote areas, for example, Aboriginal Justice Days in Western Australia.

Accessible language interpreter services

Recommendation 23: That Services Australia employ more face-to-face interpreters, especially for commonly spoken languages in regional, rural, remote and very remote areas, including Aboriginal language interpreters.

Recommendation 24: That Services Australia collaborate with local multicultural organisations to provide face-to-face interpreter services, particularly in areas where Services Australia may not have regular access to interpreters.

Recommendation 25: That Services Australia implement high-quality video interpretation services as a step up from phone interpretation, where face-to-face interpreters are not available.

Recommendation 26: That Services Australia expand the employment of bi-cultural and bi-lingual staff at Centrelink offices, to assist people to disclose relevant information and navigate the system.

Recommendation 27: That Services Australia increase awareness of the Community Language Allowance to incentivise recruitment of frontline staff who speak a language other than English including international languages, First Nations languages and Auslan.

Adequately resourced and supported Agents and Access Points

Recommendation 28: That Services Australia and the National Indigenous Australian Agency significantly increase funding for Agents and Access Points to ensure adequate staffing and resources.

Recommendation 29: That Services Australia prioritise the establishment and maintenance of culturally safe Agent services, particularly in First Nations communities.

Recommendation 30: That Services Australia increase training and support to Agent staff to ensure consistent, high-quality service across all locations.

Recommendation 31: That Services Australia implement measures to protect privacy in small communities, such as options for remote consultation with Services Australia staff from other areas.

Recommendation 32: That Services Australia develop and support Agents and Access Points to provide flexible service models adaptable to the specific needs of different communities, rather than a one-size-fits-all approach.

Recommendation 33: That Services Australia provide greater support to Agents and Access Points, including direct contact with subject matter experts within Services Australia.

Effective Remote Servicing Teams and Mobile Service Centres

Recommendation 34: That Services Australia increase resourcing and staffing of Remote Servicing Teams and expand its fleet of Mobile Service Centres to increase the frequency of visits to regional, rural, remote and very remote areas.

Recommendation 35: That Services Australia include Indigenous Customer Service Officers and social workers in Remote Servicing Teams and Mobile Service Centre visits.

Recommendation 36: That Services Australia ensure Remote Servicing Teams and Mobile Service Centres have access to interpreters or include team members who speak local languages.

Recommendation 37: That Services Australia foster stronger partnerships with local services

to better coordinate support during Remote Servicing Teams and Mobile Service Centre visits, providing a mechanism for input on community needs, cultural considerations, and scheduling of visits.

Recommendation 38: That Services Australia coordinate Remote Servicing Team and Mobile Service Centre visits with other government departments and community services to provide a 'one-stop-shop' for customers.

Expanded Community Partnership Specialist Officer program

Recommendation 39: That Services Australia continue to expand the Community Partnership Program, particularly extending reach into regional, rural and remote areas.

Recommendation 40: That Services Australia promote stronger partnerships between Community Partnership Specialist Officers and local legal, health and social services, to provide more comprehensive support.

Chapter 2: Access to digital and telephone services

Inclusive digital access for all

Recommendation 41: That Services Australia provide accessible alternatives to online services, informed by engagement with a cross-section of intended beneficiaries and which provide genuine choice to customers about how they engage.

Recommendation 42: That Services Australia reintroduce readily accessible paper forms for all administrative processes including claims, requests for review, complaints, compulsory income management exemptions/exits and Centrepay administration.

Recommendation 43: That Services Australia undertake outreach and public education campaigns to actively engage with digitally excluded communities and to ensure they are aware of and can access available social security entitlements and relevant support services including legal assistance, financial counsellors and community organisations.

Comprehensive digital literacy and education

Recommendation 44: That Services Australia continue roll-out and evaluation of digital coaching, including showing people how to navigate their digital systems and recognising where elements of digital engagement are beyond the customer who should be referred into non-digital support.

Recommendation 45: That Services Australia redesign online interfaces using principles of universal design, ensuring they are intuitive and accessible for users with varying levels of digital and language proficiency.

Recommendation 46: That the Federal Government ensure all Commonwealth-funded strategies to improve digital access include consideration of the critical role of digital servicing in facilitating social security entitlements and support.

Recommendation 47: That the Federal Government ensure all Commonwealth-funded digital mentorship initiatives are community-led.

Affordable digital access

Recommendation 48: That the Federal Government establish a Digital Allowance to address the cost of online connectivity for people on low income, with this Allowance indexed to keep pace with technology and service cost increases.

Recommendation 49: That the Department of Social Services immediately increase and index the Remote Area Allowance.

Recommendation 50: That the Federal Government review remote area costs to develop a benchmark for the Remote Area Allowance and adjust the payment accordingly.

Reliable and accessible digital platforms

Recommendation 51: That Services Australia undertake detailed mapping and analysis to establish where people have not been able to engage digitally and develop strategies through co-design with stakeholders to ensure their right to social security.

Recommendation 52: That Services Australia implement a more flexible multi-factor authentication system that accommodates users who change phones frequently or have limited access to digital devices.

Recommendation 53: That Services Australia improve the document management system to ensure uploaded documents are immediately flagged and processed, with automatic notifications sent to both Services Australia and the customer.

Recommendation 54: That Services Australia implement a system for customers to track the status of their submitted documents and claims in real time.

Secure and private digital services

Recommendation 55: That Services Australia develop a 'secure mode' for myGov accounts that hides sensitive information and activities from the account overview, designed for users at risk of technology-facilitated abuse.

Recommendation 56: That Services Australia improve their response and handling of cases where technology-facilitated abuse is suspected, with the power to quickly secure and recover compromised accounts.

Recommendation 57: That Services Australia develop and implement a public awareness campaign about the risks of sharing account credentials and the importance of maintaining personal control over government service accounts.

Recommendation 58: That Services Australia collaborate with legal, domestic violence and financial counselling organisations to create and distribute educational materials on digital safety and privacy for Centrelink recipients.

Prompt and accessible call handling

Recommendation 59: That Services Australia significantly increase staffing for phone support services to reduce wait times, with a target maximum wait time of 15 minutes.

Recommendation 60: That Services Australia create a priority queue system for callers from identified remote or low-connectivity areas to ensure they can access services effectively during periods of reception.

Recommendation 61: That Services Australia implement a more flexible callback system that allows callbacks to be scheduled at specific times when they know they will be available and in areas with reliable reception.

Recommendation 62: That Services Australia provide customers a choice about whether calls are received as a 'private number' or 'Services Australia', instead of automatically blocked numbers listed as 'private number'.

Recommendation 63: That Services Australia ensure that, when requested by a customer, all confirmation text messages regarding pre-booked appointments and callbacks are received in advance of the scheduled time.

Inclusive telephone systems

Recommendation 64: That Services Australia conduct regular consultations with diverse community groups to enable ongoing identification of phone service barriers, and develop strategies to address them.

Direct communication channels for advocates

Recommendation 65: That Services Australia develop a mechanism for community workers to engage directly with Services Australia in a timely way to better support their mutual clients.

Recommendation 66: That Services Australia re-establish and strengthen relationships between local Services Australia offices and community-based organisations, facilitating more efficient, context-aware problem-solving.

Recommendation 67: That Services Australia review membership of the Civil Society Advisory Group to ensure inclusion of key community organisations, with a view to addressing systemic issues and improving communication channels.

Chapter 3: Proof of identity requirements

Flexible and responsive proof of identity processes especially for women in vulnerable circumstances

Recommendation 68: That Services Australia improve training and support for frontline staff to identify people struggling with proof of identity requirements, encouraging them to apply Reviewable and Non-Reviewable Alternative Identity Processes, and to seek documents held by other government departments, where appropriate.

Recommendation 69: That Services Australia and Department of Social Services amend the Social Security Guide to extend the Identity Review Period from two pay periods (28 days) to mirror disaster-related identity provisions (eight weeks, with possible extension of up to eight weeks).

Recommendation 70: That Department of Social Services amend the Social Security Guide, mirroring disaster-related provisions, to reflect the diversity of circumstances that undermine people's capacity to establish proof of identity, including escaping family and domestic violence, homelessness, certain medical conditions, living in remote communities, being recently released from incarceration, having an unregistered birth, and other personal crises.

Competent frontline staff trained in alternative identity processes

Recommendation 71: That Services Australia provide summary materials and undertake training of targeted community service providers on how vulnerable clients may access alternative proof of identity provisions.

Recommendation 72: That Services Australia improve training for frontline staff on use of alternative identity processes for First Nations people.

Recommendation 73: That Services Australia refer claimants living in 4R Australia to the Remote Servicing Team if they are having trouble satisfying proof of identity requirements, so the Remote Servicing Team can undertake follow up on the next community visit.

Improved proof of identity processes for First Nations women

Recommendation 74: That Services Australia improve its capacity to confirm proof of identity for First Nations people where documents include traditional and cultural naming conventions.

Recommendation 75: That the Department of Social Services and Services Australia amend the Social Security Guide and related RA010 form to allow a broader range of appropriate community identity verification referees, in consultation with First Nations people and organisations (for example, art, language and cultural centres).

Recommendation 76: That Services Australia promote alternative proof of identity requirements for First Nations people to community organisations, particularly First Nations community-controlled organisations.

Recommendation 77: That the Federal Government and/or state and territory governments fund Pathfinders to assist more First Nations people to register their births and obtain essential proof of identity.

Flexible proof of identity requirements for young women

Recommendation 78: That the Department of Social Services amend the Social Security Guide to create specific and transparent pathways for young people without parent or guardian support struggling to satisfy standard proof of identity requirements, including referral to social workers, extending identity review periods and providing additional support where necessary.

Improved identity verification for women with foreign documents

Recommendation 79: That Services Australia proactively assist people to obtain or substantiate required proof of identity documents from Department of Home Affairs when the Immigration Datalink is inaccessible or documentation inconsistencies impede data matching.

Recommendation 80: That Services Australia implement clearer guidance for frontline staff assessing proof of identity documentation inconsistencies, including differing date of birth or spelling, aiming to expedite claims as quickly as possible.

Gender-affirming identity verification for transgender women

Recommendation 81: That Services Australia ensure proof of identity processes for transgender people who have not completed legal name changes are adequate, including acceptance of documentation from medical practitioners.

Recommendation 82: That Services Australia provide dedicated training for frontline staff on sensitively managing proof of identity requirements for transgender clients, including appropriate use of names and pronouns regardless of documentation status.

Reintegration-focused identity verification for women leaving institutional settings

Recommendation 83: That Services Australia ensure access to Prison Liaison Officers in all jurisdictions to ensure pre-release services are provided to all women held in detention, so they are able to troubleshoot proof of identity issues and access their entitlements without delay upon release.

Recommendation 84: That Services Australia investigate how they may integrate use of prison institutional documentation as a satisfactory form of proof of identity, for example prisoner photo identification, official bail paperwork and medical documents.

Recommendation 85: That Services Australia develop a mechanism for direct contact between prison and hospital staff, related support services and Services Australia's Incarcerated Customer Service Team to ensure women are supported to access their entitlements.

Chapter 4: Access to internal reviews

Clear and accessible pathways to internal review

Recommendation 86: That Services Australia provide more detailed explanations for decisions as a default, increase opportunities for people to clarify and ask questions, with the aim of avoiding need for administrative review.

Recommendation 87: That Services Australia increase frontline staff's capacity to advise people about explanations and Authorised Review Officer reviews.

Recommendation 88: That Services Australia explicitly inform people who request a review that they are not obliged to agree to an explanation and have a legislative right to go directly to an Authorised Review Officer.

Recommendation 89: That Services Australia develop targeted education campaigns to increase understanding of internal review systems, including strategies to reach people with minimal English comprehension (for example, through translation and use of visuals such as flow charts or infographics).

Adequate resource allocation for timely internal reviews

Recommendation 90: That Services Australia allocate resources for additional Authorised Review Officer positions to alleviate delays and significant backlog of requests.

Recommendation 91: That Services Australia implement a tracking system that allows people to monitor their review status.

Recommendation 92: That Services Australia regularly publish data on review (Authorised Review Officer and explanation) timeframes, outcomes, and related demographic data.

High quality internal review decisions

Recommendation 93: That Services Australia ensure Authorised Review Officers' caseloads allow adequate time to deliver clear and detailed decisions.

Recommendation 94: That Services Australia review Authorised Review Officer training and quality control measures, including reintroducing geographic or subject matter specialisations, increasing information flow between Authorised Review Officers and legal branch staff, reviewing KPIs to ensure they are not limiting quality of decisions, and ensuring processes for Authorised Review Officers to raise and escalate systemic issues.

Chapter 5: Access to external reviews

Comprehensive and accessible resources on administrative review rights

Recommendation 95: That the Administrative Review Tribunal publish plain language resources about appeal rights and social security matters in multiple formats on their website and disseminate them to a wide range of community organisations.

Recommendation 96: That Services Australia improve Authorised Review Officer (ARO) decision letters to ensure the explanation about a person's right to external review is obvious to the reader and is accessible.

Recommendation 97: That the Administrative Review Tribunal improve outreach programs including education programs and community engagement forums.

Inclusive and accessible external review mechanisms

Recommendation 98: That the Administrative Review Tribunal establish an independent external Advisory Council to provide advice on matters of accessibility and inclusion including regional, rural, remote and very remote participants, people experiencing family and domestic violence, First Nations people and people with disabilities.

Recommendation 99: That the Administrative Review Tribunal publish practice directions for social security matters, providing guidance on how these matters should be heard; ensuring that first review of Centrelink decisions remains informal, accessible, and non-adversarial.

Recommendation 100: That the Administrative Review Tribunal implement comprehensive data collection on access barriers and conduct regular reviews of geographic access patterns.

Recommendation 101: That the Administrative Review Tribunal implement a comprehensive consultation process with people living in regional, rural, remote and very remote Australia when designing, modifying, or implementing accessibility policies and procedures. This consultation should explicitly include consideration of preferences for in-person versus remote service delivery.

Recommendation 102: That the Administrative Review Tribunal establish a physical registry in the Northern Territory in accordance with recent amendments to the Administrative Review Tribunal Act 2024 (Cth).

Recommendation 103: Pending the establishment of a permanent registry, that the Administrative Review Tribunal deliver registry services through the Supreme Court of Australia registry offices in the Northern Territory in Darwin and Alice Springs, as is currently provided at the Norfolk Island Supreme Court registry office.

Reliable and accessible remote participation options

Recommendation 104: That the Administrative Review Tribunal implement policies and procedures that specifically address accessibility challenges, incorporating realistic assessments of technological capabilities and community needs in regional, rural, remote and very remote areas.

Genuine agency engagement with external review processes

Recommendation 105: That the Department of Social Services and Services Australia develop and publish a formalised protocol to support continuous improvement arising from Tribunal outcomes, including examples of best practice, and share learnings more effectively within the agencies. This statement should be accompanied by a list of concrete steps for how the agencies will give effect to that commitment.

Recommendation 106: That the Department of Social Services and Services Australia improve training for legal officers about core duties and responsibilities including model litigant obligations, specific guidance on early resolution and use of alternative dispute resolution.

Recommendation 107: That the Department of Social Services and Services Australia incorporate the new referral and escalation powers available under the ART reforms (such as the Guidance and Appeals Panel) into their policies and procedures. This should include guidance to staff on the different options available for the treatment of potential test cases in the Tribunal.

Recommendation 108: That the Department of Social Services and Services Australia publish and disseminate its model litigant guidelines, similar to those published by the National Disability Insurance Agency and the Australian Tax Office, including a complaints process.

Tribunal decisions which demonstrate an understanding of regional, rural, remote and very remote living

Recommendation 109: That the Administrative Review Tribunal comprehensively review and update Member training and guidance materials to ensure proper consideration of regional, rural, remote and very remote living in decision-making, including 'bench' books, handbooks and policies in consultation with regional, rural, remote and very remote communities.

Chapter 6: Access to social security legal assistance

Adequately and sustainably funded social security legal services

Recommendation 110: That the Federal Government increase funding to EJA's member centres providing specialist social security legal assistance and programs through a designated social security funding stream under the National Access to Justice Partnership in the amount of an additional \$5 million per year on top of baseline funding over the life of the agreement.

Recommendation 111: That the Federal Government allocate ongoing additional funding through Department of Social Services to support EJA's core functions, with an emphasis on capacity to provide timely and expert analysis to inform Parliament and key departments' considerations of social security law and policy.

Recommendation 112: That the Federal Government fund EJA member centres to provide legal advice to clients pre-Administrative Review Tribunal hearing, and establish a system where unrepresented clients can access a duty lawyer.

Sustainable natural disaster funding for social security legal services

Recommendation 113: That the Federal Government fund permanent core disaster response funding to ensure EJA members are able to undertake crucial resource and relationship development, and have the capacity to address current and pending need for specialist social security legal assistance related to natural disasters.

Adequately funded other legal assistance services in regional, rural, remote and very remote areas

Recommendation 114: That the Federal Government significantly increase funding to community legal centres as detailed in the Community Legal Centres Australia 2025-26 Federal Budget Submission.

Recommendation 115: That the Federal Government significantly increase funding to family violence prevention legal services as detailed in the First Nations Advocates Against Family Violence 2025-26 Pre-Budget Submission.

Recommendation 116: That the Federal Government significantly increase funding to Aboriginal Torres Strait Islander Legal Services as detailed in National Aboriginal and Torres Strait Islander Legal Services' Submission to the Independent Review of the National Legal Assistance Partnership 2020-25.

Strong workforce of experienced social security lawyers in regional, rural, remote and very remote areas

Recommendation 117: That the Federal Government establish a National Regional, Rural, Remote and Very Remote Access to Justice Strategy and Action Plan.

Recommendation 118: That the Federal Government implement standards which address sufficient funding to ensure equitable salaries, not less than Legal Aid Commission levels, for community legal workers' salary levels in regional, rural, remote and very remote Australia.

Recommendation 119: That the Federal Government introduce initiatives to support regional, rural, remote and very remote justice career options, including financial support for law students to undertake clinical and other placement programs; and financial incentives for practicing in non-metropolitan areas, such as a HELP loan forgiveness or reduction.



Introduction

Women make up just over half of all social security recipients in Australia. Some receive full rate payments, relying on social security as their only source of income. Others receive part-payments, often due to income from part-time work.

While some women are unemployed and required to look for work, others receive payments because they are unable to work full-time for reasons include illness or disability, caring responsibilities for children or others, and study. Almost one and a half million women receive Age Pension, having 'aged out' of work.

Women are particularly over-represented as recipients of payments based on care of children, comprising more than 80 per cent of Family Tax Benefit recipients and more than 90 per cent of Parenting Payment recipients.¹ Women are also over-represented as carers of people who are frail or have an illness or disability, comprising more than 70 per cent of both Carer Payment and Carer Allowance recipients.²

While there is no data available on who within a household is accessing and spending those funds, simply by weight of numbers it is apparent that women are shouldering a significant administrative burden – claiming and having to regularly interact with Services Australia to retain these payments. Women are also more likely to be liable for a debt as recipient of these payments, regardless of how much control they had over how the funds were used and whether they or another person used those funds.

Women's relationship with social security is often more complex and long-term than men's, shaped by interrupted work histories due to childrearing, lower rates of full-time work, and lower lifetime earnings. Women are also far more likely to experience violence at the hands of an intimate partner. In rural, regional, remote and very remote (4R) Australia, the effects of these gendered experiences are often amplified. Compared to their city counterparts, women in 4R areas are more likely to be primary caregivers, have lower workforce participation rates, and are more likely to experience domestic violence. They also battle additional obstacles that undermine access to limited but essential support services.

The intersection of gendered and geographic disadvantage creates unique challenges when it comes to accessing and maintaining social security support. Better understanding how this disadvantage operates is critical to ensuring our social security system effectively serves all Australians, regardless of where they live.

Over the last decade, EJA member centres have regularly identified barriers to social security access for many living in 4R areas, particularly women. These issues form a significant portion of casework for members based in 4R areas and are frequently encountered by urban centres with statewide reach.

1 As of 27 September 2024. Data obtained from the Department of Social Services.

2 Department of Social Services. (2024). Expanded DSS Benefit and Payment Recipient Demographics – September 2024.

During 2023 and 2024, EJA undertook research to better identify structural and service delivery barriers that limit the ability of women in 4R Australia to access and maintain full social security entitlements. The research considered four core questions:

1. How do service delivery issues in 4R areas affect women's ability to access and maintain their social security entitlements?
2. What structural barriers prevent women in 4R Australia from accessing and maintaining their social security entitlements?
3. What impacts do these structural and service delivery barriers have on women in 4R communities, particularly those experiencing domestic and family violence?
4. What reforms to policy, service delivery, and legal assistance services would help address these barriers and improve outcomes for women in 4R communities?

This project drew on research findings to develop evidence-based recommendations to overcome these access issues. These recommendations relate to social security law and policy reform, service delivery reform, and reform to specialist legal service delivery.

This research was generously funded by philanthropic grants from the SNOW Foundation and Paul Ramsey Foundation.

Project Methodology

EJA is deeply appreciative of the contribution of many people to this report and the research underpinning it. Contributors are listed at Appendix 1.

Advisory Group

An Advisory Group was appointed to provide advice and support to steer the direction of the research, advise on ethical considerations, and provide input on specific aspects of the research based on members' expertise. The role of the Advisory Group is ongoing.

Research

Research relied on a mixed methodology approach including:

- Qualitative research based on interviews with community service providers
- Quantitative analysis of data obtained from Services Australia and the Administrative Appeals Tribunal
- Desk review of current Australian research on the experiences of women in 4R Australia and social security
- Legal analysis of social security policy, legislation and case law

Definition of terms

Key terms were defined as follows:

• Women

The term 'women' refers to all people who identify as women regardless of their sex assigned at birth. This follows the Australian Government Guidelines on the Recognition of Sex and Gender; guidelines relied upon by both Services Australia and the Department of Social Services.

EJA acknowledges that, while the findings of this report focus on women's experiences, many of the challenges discussed – and subsequent recommendations for social security reform – are applicable across all genders.

• 4R

'4R' is an abbreviation of 'rural, regional, remote and very remote', used here for expediency and ease of reading.

In describing 4R areas, this research relies on geographic classification contained in the Modified Monash (MM) Model, which is based on the Australian Statistical Geography Standard – Remoteness Areas (ASGS-RA) framework.

This project drew from the Department of Health and Aged Care's interactive map to attribute geographic classifications to specific locations.¹ Service providers were classified as follows.

Geographic Locations	
National	Service located in metropolitan areas (MM1) providing services throughout the country.
Statewide	Services located in metropolitan areas (MM1) providing services throughout their state or territory.
Regional	Regional centres: (MM 2) Areas within 20km of a town with a population Large rural towns: (MM 3) Areas not in MM 2 and within 15km of a town with a population between 15,000 and 50,000.
Rural	Medium rural towns: (MM4) Areas not in MM 2 or MM 3 and within 10km of a town with a population between 5,000 and 15,000 Small rural towns: (MM5) All other areas in ASGS-RA 2 and 3.
Remote	Remote communities: (MM6) All areas categorised ASGS-RA 4 and islands that are separated from the mainland and are less than 5km offshore. Also islands with a population of less than 1000 with no bridge to the mainland.
Very remote	Very remote communities: (MM7) All other areas that are categorised ASGS-RA 5 and populated islands separated from the mainland in the ABS geography that are more than 5km offshore.

• **First Nations**

This report uses the term 'First Nations', recognising that Aboriginal and Torres Strait Islander peoples are the first sovereign peoples of Australia, with their own diverse languages, cultures, and connections to Country. While the term is generic, we seek to acknowledge the diversity of Aboriginal and Torres Strait Islander peoples.

EJA is aware that different individuals and communities prefer different terms, and that terminology continues to evolve.

A list of all acronyms is included at Appendix 2.

Scoping

Preliminary interviews and scoping research were undertaken with EJA members to establish the focus and boundaries of the project, identifying key issues requiring consideration in the report.

Charles Darwin University's LWA210 Law, Lawyers, Justice: Regional, Rural, Remote class of 2023 participated in a secondary scoping exercise and discussion of issues to test some of the assumptions from the initial EJA scoping exercise. The students presented and discussed a range of access to justice issues, including social security challenges particular to the Northern Territory, which helped shape the research focus. Our thanks for their unguarded input and nuanced observations.

Interviews

Interviews were conducted with individuals or in small groups with 160 community service workers working in diverse 4R areas, including:

- Staff from all EJA member centres, who drew on their social security specialist legal expertise to describe the experience of their clients, particularly women living in 4R areas.
- Community services providers from a diverse range of organisations, who provided input based on their work in family and domestic violence services, community health organisations, community legal centres, migrant women's services, disability organisations, Aboriginal community-controlled organisations, financial counselling services, community and neighbourhood centres, and more.

Interview subjects were chosen based on the following priorities:

- Geographic spread across state and territory jurisdictions
- Geographic spread across rural, regional, remote and very remote areas
- Diversity of focus and specialisations

An initial list of interviewees was expanded based on suggestions made by interviewees at the conclusion of each interview, i.e. 'Who else would have something important to say about this area? Who else should we interview?'

A list of participating organisations is at Appendix 3, noting a small number wished to remain anonymous.

Figure 1: Location of service providers interviewed



Interviews were based on a series of open-ended questions (Appendix 4) to allow participants to raise their own priorities in terms of experience and asks. This resulted in wide ranging responses that touched on issues across the enormous social security system.

The majority of interviews were conducted by staff from EJA, with additional interviews by staff from Social Security Rights Victoria, Welfare Rights Centre NSW and Wotton Kearney.

Interviews were conducted in a variety of locations according to interviewees' preference, including community legal centres, women's refuges, Aboriginal Land Councils, health centres, coffee shops, local radio stations, community hubs, online video calls, and more.

We extend our sincere thanks to those who made time to participate in an interview amidst their very full casework practices. Their generous participation is taken as an indication of the importance they attribute to social security access for their clients and communities.

Most interviews were recorded. When recording was deemed inappropriate, detailed notes were taken. Recorded interviews were transcribed using Rev transcription software, with transcriptions checked for accuracy by a team of law students, most of whom joined the project through the support of the University of Queensland's Pro Bono Centre. EJA extends our thanks to both students and UQ Law Pro Bono Centre staff who facilitated student participation.



Sally Cameron (EJA) meeting with University of Queensland law students at Basic Rights Queensland



Taylah Bell (EJA) with University of Queensland law students who assisted with data checking and transcription

Interviews were themed using NVivo software and analysed to identify recurring issues. Example quotes from the expansive collection of interviews are included throughout the report.

Analysis of Administrative Appeals Tribunal decisions

Analysis of Administrative Appeals Tribunal (AAT) General Division decisions was undertaken by the University of Melbourne's Executive Branch Research Lab students, to further identify barriers women from 4R areas face accessing and maintaining social security. Our thanks to staff and their supervising academics.

A total of 2087 AAT decisions made between 2019 and 2024 were assessed via the Austlii legal database, using six key search terms against specific payment types; Carer Allowance, Carer Payment, Disability Support Pension, Family Tax Benefit, JobSeeker Payment, Parenting Payment, Special Benefit.

The following six key search terms were used:

- (regional OR remote OR rural) AND "payment type"
- (paddock! OR farm! OR town!) AND "payment type"
- (Travel) AND
- (she OR her) w/5 "payment type"
- (women OR female) AND "payment type"
- Tailored questions for the specific payment type

For each search term, the following settings were applied:

- Reverse chronological order; and
- The first 50 cases.

The Modified Monash Model was used to determine whether the location identified in the AAT decision should be classified as regional, rural, remote or very remote.

As only decisions at AAT2 level are published, results were limited to appellate decisions. Anonymised cases without clear gender or locations were discarded. Fifty cases (2.4 per cent of all AAT cases) were identified as referencing women's 4R location in a decision. Theming and analysis of issues was then undertaken. Findings from this research are used throughout this report, but particularly in Chapter 5: Access to External Review.

Administrative Appeals Tribunal (AAT) General Division decision data was analysed for EJA by a data analyst to identify patterns related to geographic location.

This report

This report has been authored by EJA staff with additional research assistance through Wotton Kearney's Pro Bono program.

Draft chapters were checked for accuracy by practicing solicitors from EJA member centres. The first four chapters, which reference Services Australia's structure and operations, were checked for accuracy by Services Australia, noting that did not include fact checking of general statements or matters of opinion where not supported by a source document.

Case studies are real, provided by EJA member centres, with all but AAT published cases de-identified, including minor changes to specific dates and locations to protect individual client's privacy. Design and layout undertaken by Stuart Horton-Stephens, with initial layout and concept generously provided pro bono from Hall and Willcox.

This is the first of three reports based on our research findings, which form part of the Social Security for Women Outside Our Cities series.

The second and third reports are due for publication by mid-2025.

Advocacy

This project was always intended as a means to ensure evidence-based advocacy. EJA recognises that systemic change will not be achieved through publication of this report series alone.

The next stage of this project involves working with communities, Australian governments and key stakeholders as EJA undertakes targeted advocacy activities and capacity-building workshops to progress the recommendations resulting from this research project. Reforming the social security system will require concerted and coordinated efforts from many different sectors and institutional bodies working together to achieve meaningful change.

Within that context it is important to note that EJA has drawn from evidence provided during the interview process since early 2023. That evidence has already proven critical to information exchange and advocacy processes undertaken with the relevant Ministers, the Department of Social Services and Services Australia.



Taylah Bell (EJA) with staff of Welfare Rights and Advocacy Service and Legal Aid WA at Willare on the way to Fitzroy Crossing in the Kimberley, WA.



Sally Cameron (EJA) with EJA Board Member Mitra Khakbaz, preparing interviews, Central Queensland.



Taylah Bell (EJA) with members of the Tangentyere Women's Family Safety Group, Alice Springs, NT.



Mark Morand and Aylin Yigit (Social Security Rights Victoria) preparing to meet with staff at Mallee Community Legal Centre in Mildura, Victoria.



Taylah Bell with members of the Central Australian Womens Legal Service and the Piliyintinji-Ki – Stronger Families team at Anyinginyi Health, Tennant Creek, NT.



Donna Flood and Allientia Weldon-Oti (Welfare Rights Centre NSW) with staff of Western NSW Community Legal Centre in Dubbo, NSW.



Sally Cameron (EJA) with staff of Gladstone Women's Health in Gladstone, Qld.

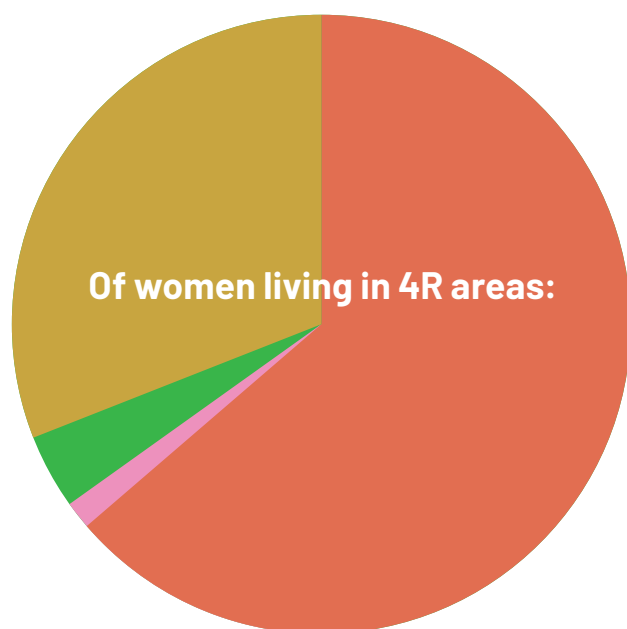


Taylah Bell (EJA) with staff of Central Australian Youth Link Up Service (CAYLUS)

A Snapshot of Women in 4R Australia

28%

**of women in Australia
live in 4R areas.¹**



- **65% live in inner regional areas**
- **29% in outer regional areas**
- **4% in remote areas**
- **2% in very remote areas.²**

78%

**of one parent
families are
headed by
women.³**

36%

**of women
cite caring for
children as the
main reason
they are unable
to work more
compared to
7% of men.⁴**

72%

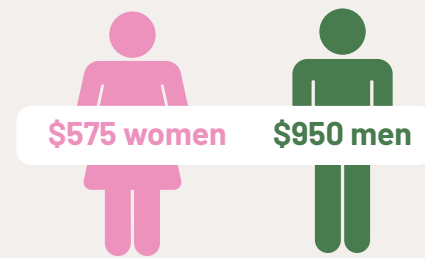
**of primary
carers are
women.⁵**

**Primary
carers are
more likely to
live outside
major cities.⁶**

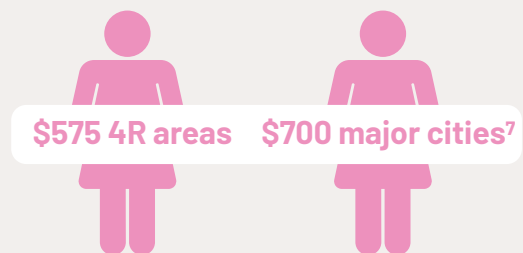
23%

of women living outside major cities have experienced partner violence compared to 15% of women living in major cities.⁶

Weekly income in 4R areas



Weekly income for women



One quarter of women in 4R areas have a personal income under \$400/week.⁸



Levels of economic disadvantage increase with remoteness.⁹



Women make up just over half of all social security recipients.¹⁰

Women are overrepresented as recipients of payments relating to care:

94% of Parenting Payment Single

90% of Parenting Payment Partnered

71% of Carer Payment

88% of Family Tax Benefit A and B (when a single parent)

82% of Family Tax Benefit A (when partnered)¹¹

Solicitors practicing in:

4R areas: **9%**

Cities: **87%**¹²

Access to face-to-face social security services

This idea that it's just easy for everyone to pick up a phone and call Centrelink, or jump on a computer and do it, or drive a car or jump on a bus and get to town and go to an appointment ... it just does not reflect where we live. This is not Sydney. This is not Melbourne. This is a really remote place and doing anything is harder and takes longer and is more expensive here, and there's just no understanding about it whatsoever from a Centrelink systems level.

- Remote Northern Territory

Key findings

8. Face-to-face services can be a lifeline for women in regional, rural, remote and very remote (4R) areas. They are often the preferred or only viable means of engagement.
9. When delivered well, face-to-face servicing is more likely to help women with complex needs or facing multiple obstacles to access social security than digital or phone servicing.
10. Face-to-face services can be difficult to access, resulting in long delays and sometimes complete exclusion from social security entitlements.
11. Agents and Access Points extend servicing but provide limited assistance, with many underfunded and lacking training to meet demand.
12. Remote Servicing Teams and Mobile Service Centres are held in high regard and when women can access their services, they are considered effective.
13. The Community Partnership Project is providing valuable services to women who are particularly vulnerable, for example, because of homelessness.
14. Effective face-to-face service provision remains fundamental to satisfying recommendation 10.1 of the Robodebt Royal Commission which requires that policies and processes are designed with an emphasis on the people they are meant to serve.

How does Services Australia provide face-to-face services?

Services Australia's face-to-face services can be divided into the following categories:

- Service Centres (colloquially known as Centrelink offices)
- Agents and Access Points
- Outreach services, including
 - › Remote Servicing Teams (RSTs)
 - › Mobile Service Centres
 - › Community Partnership Specialist Officers (CPSOs)

As of 4 June 2024, there were 886 physical Services Australia service locations in Australia, comprised of 318 Service Centres, 354 Agents and 214 Access Points.

	Metro	Regional	Rural	Remote	Very remote	Total
Service Centres	155	79	47	13	24	318
Agents	3	72	98	33	148	354
Access Points	1	36	86	42	48	214

Service Centres

Service Centres are what people think of when they think of a Centrelink office.

Of the 318 Service Centres across Australia, all provide Centrelink and Medicare services, six are co-located with the Veterans Information Service, and 107 are co-located with the National Disability Insurance Agency. As of 30 September 2024, 122 Service Centres have undergone a re-design under the 'Modernising our service centres' scheme.

The desire for face-to-face servicing cannot be overstated, noting it was one of the strongest and most consistent findings of this project.

According to Services Australia, staff in Service Centres 'are trained in a variety of tasks including new claims processing, payment eligibility, front of house processes, digital assistance, health eligibility and processing, managing customer aggression, privacy principles and ethics.' Service Centre staff also 'have access to subject matter experts ... program support staff, senior service officers and the Service Delivery Technical Support Model which includes Local Peer Support (LPS) as well as [Authorised Review Officers].'

What is working well?

When service providers were asked the broad question, 'What is Services Australia doing well for women in your community?', the most common answer was that when face-to-face services were provided well, they worked. The desire for face-to-face servicing cannot be overstated, noting it was one of the strongest and most consistent findings of this project.

In short, community service providers told us that access to appropriate and adequate face-to-face social security services is the best way to assist women in 4R areas. Face-to-face services are highly valued and considered more likely to be effective than digital or other modes of services because they can address:

- **Digital exclusion.** Women in 4R areas often lack alternative methods to access Services Australia, including telephone, digital equipment and infrastructure.
- **Language, communication and cultural barriers.** Many women in 4R areas struggle with inaccessible language, cultural, literacy and communication requirements which are exacerbated when services are not face-to-face.
- **Sensitive nature of dealings with Services Australia.** Many women in 4R areas prefer or require face-to-face services when disclosing personal information such as financial material, incidents of family and domestic violence, homelessness, employment status, caring responsibilities for children and adults, and medical conditions.
- **Negative reputation and past experiences with digital services.** Many women in 4R areas resist digital services given previous negative dealings with digital and telephone services, including long wait times, security issues and poor outcomes.
- **Legal and bureaucratic complexity.** Many women in 4R areas experience extreme challenges navigating the complexity of the social security system without face-to-face support.

Services providers reported that face-to-face services were more likely to result in vulnerable women 'being heard', as they were given the opportunity to provide all relevant information and had confidence in their interaction with the Services Australia officer, usually resulting in an effective resolution of the issue.

That's the issue for me - it's that facelessness. People feel more confident when they're actually talking to a person. And I think that as women in regional and remote areas, that's less and less available to them than it would be for someone in a major [city] centre that can actually cross a threshold and have someone on the other side of the desk.

— Rural Western Australia

We have a couple of generations that will want [digital services]. I'm looking at my grandchildren, they'll probably be really happy not to speak to someone face to face. Just to do everything [online]. But we are leaving behind those vulnerable people that just are not engaging with that.

— Very remote South Australia

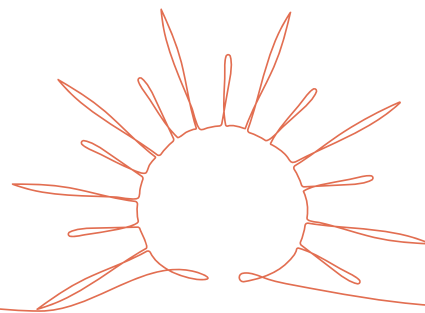
It's the [social security system that's] the issue. It's an enormously cumbersome machine to deal with. The people who are customer-facing within it, at our local branch, they're absolutely 100 per cent amazing. They're just fantastic. I actually tell people who say to me, 'Oh well I'll call into Centrelink in [regional centre] tomorrow.' I say 'don't you dare. You drive the two and a half hours and come to [our rural town].' Because there you'll at least get spoken to by people who have some empathy, some understanding, some knowledge of another human being on the other side of a desk. They're very good at making the system accommodate the people. They're absolutely amazing ... They've got a jolly good attitude of 'I'm here to help that person. ... I'm here to give you a hand'.

— Rural Queensland



When service providers shared positive experiences of women accessing face-to-face services at Service Centres, they valued:

- **Frontline staff demonstrating geographic and cultural awareness.** Women felt better understood and supported to resolve their social security issue when frontline staff applied understanding of local geography, cultural norms, and community networks.
- **Frontline staff's knowledge reflecting adequate training to address the enquiry.** Women's experiences were significantly improved where staff provided accurate information and processed queries promptly and correctly.
- **Access to face-to-face social workers being made available.** Women highly valued the opportunity to meet face-to-face with a social worker, reporting a sense of being listened to, and valuing the opportunity to build rapport while also circumventing the need to explain their circumstances multiple times to new workers.
- **Plain language explanations.** Women better understood their social security entitlements and relevant processes when in-person staff provided explanations in plain language.
- **Proactive referrals to support services.** Women benefited from staff referring them to additional support services.
- **Direct contact for service providers with local staff.** Service providers were better able to provide efficient services to women where they were able to directly contact social workers and Indigenous Support Officers, to both workers' and clients' benefit.
- **Services Australia staff attending local interagency network meetings.** Services Australia staff who attended local interagency network meetings built stronger professional relationships and gained better awareness of community issues.



What needs to change?

We asked service providers about their clients' typical experience when accessing a Service Centre, with a focus on women's experiences. While experiences varied, several common issues were frequently reported:

A default to digital and telephone services

Women seeking face-to-face assistance from Services Australia were frustrated when, after making the effort to visit a Service Centre, they were directed to use a 'self-service' computer terminal or telephone in a public waiting area to provide information or get advice.

Often, they had made considerable effort to get to the Service Centre and arrived with the expectation of human interaction and support. They found being turned away from face-to-face servicing disappointing, frustrating and sometimes distressing, because they felt they needed to interact with a person to explain and resolve their issue.

I think whilst there are a lot of benefits to some stuff being streamlined digitally and online, actually [social security] is one of those more complicated things that you need that person face-to-face.

— Rural Western Australia

On-site phones also raise privacy concerns given phones are usually located in the public waiting area. Discussing personal and often sensitive information in a crowded waiting room was so uncomfortable that it acted as a deterrent for some seeking help at all. It also posed real safety risks, including women being overheard by people that could use that information to harm them.

They have the Centrelink phone but it's such a tiny space. There's no privacy. It doesn't really work. And it's really their business. And [for] First Nations people - barriers, the trauma, intergenerational issues that they live with today and impacts their life - some of the community members, they don't talk [about their issues]. So, to have to walk into that [Service Centre] and get on the phone and then there's someone, a relative or a neighbour, they do not want that business to be known. That is their stuff, or men's business or women's business.

— Remote Queensland

Service providers expressed clear frustration that Service Centre staff would not just sit with them and/or their clients to address their queries.

[Centrelink workers have] told me to use the phone there, but I suppose it's that privacy thing as well too. And [we need] the assistance to say, 'What do I need to say on the phone?' They might say, 'Oh, go and phone them then and ask blah, blah, blah.' But then [they're] gone. They've gone somewhere else ... [My clients] say, 'I don't want to make the phone call there. Why can't they just sit and help me?'

— Very remote South Australia

Referral to self-service computers denies the reality that many women come into Service Centres because they lack the capacity to digitally engage.

[Going to a Service Centre] is definitely not my favourite pastime. Mainly because there's always a somewhat long wait ... The most recent time that I took someone in ... we ended up speaking to someone ... but we were missing some things. She encouraged us to go onto one of the computers there. And I think if I wasn't there, my client would've really struggled with that. She was older and not great with the computer.

— Rural New South Wales

Often, they had made considerable effort to get to the Service Centre and arrived with the expectation of human interaction and support.



When women do not own a computer, Services Australia staff also refer to off-site computers. In many parts of Australia, it is not uncommon to see people attempting to complete interactions with Services Australia, without assistance, at their local library.

They often get told to go to the library ... and do their work there. But, of course, a lot of people don't have ... computer literacy and accessibility skills. They're not able to navigate that kind of thing.

— Rural Western Australia

Pushing people away from face-to-face interactions within a Service Centre is also problematic when women present with literacy issues, with trauma or in mental distress.

A lot of people have got trauma, they've got mental health issues, they've got literacy barriers, all sorts of things that mean that when they meet that interface with Centrelink locally, [which is] all about the assumption that you're going to be able to manage your own pathway through, they can't ... They're usually told to go over and make a phone call at the front on the phones.

— Rural Western Australia

There is enormous diversity of need and capabilities among people trying to access social security. The movement of human resources away from face-to-face servicing, while efficient for some, is creating significant barriers for many who do not have digital or phone options, particularly those in vulnerable situations. It is essential that Services Australia's push towards digital efficiencies does not leave behind women in 4R areas who most need face-to-face support.

Recommendation 1: That Services Australia allocate additional resourcing to improve access to face-to-face servicing in Service Centres (consistent with Robodebt Royal Commission recommendation 13.3).

Recommendation 2: That Services Australia identify communities with high need for face-to-face services, and allocate additional resourcing for face-to-face services to these areas.

Recommendation 3: That Services Australia ensure frontline staff are trained to identify and assist those who struggle with digital access.

Recommendation 4: That Services Australia create private spaces for phone calls when in-person support is not immediately available.

Recommendation 5: That the Federal Government invest in digital inclusion programs to improve digital infrastructure, affordability and literacy, prioritising those who are digitally excluded, particularly outside major cities.

Recommendation 6: That the Federal Government expand funded positions within community sector organisations to assist people to access and navigate digital interfaces.

Lack of private spaces

At times, the design of Services Centres contributes to women having a poor experience, acting as a barrier to social security access.

Designed to accommodate many competing demands, including a need to ensure the safety of Services Australia staff, the prevalence of open-plan layouts has given rise to a host of issues that significantly impact the quality and effectiveness of services.

A lack of private spaces affects women's willingness to disclose critical information to frontline workers, including information about family violence, medical conditions, caring responsibilities, homelessness and other deeply personal matters, which sometimes go unreported due to fear of being overheard. That can have severe consequences, including preventing women receiving correct social security entitlements, or incurring debts.

A big thing is privacy ... It is really awful because when someone is trying to use that Centrelink [Service Centre], they've got someone ... so close to them that it's uncomfortable.

— Remote Queensland

Women seeking help are forced to discuss their most personal matters in public. Some report feeling humiliated and exposed given the potential for other customers to hear their private information.

Where I live, [Centrelink] is in the same office with Medicare ... So, you take a ticket and then you go and sit down with everyone for whatever they're there for and then it's all open. It's not even private. I saw a couple of people I knew, and I could hear what they were saying. None of them were allowed to sit and they had to stand, and the people were behind glass. It was intimidating, it was not private, and the staff were not nice. Whether they're taught ... to be stone cold ... I wouldn't want to be standing there talking about

anything in a situation like that. I mean it doesn't have to be an office, but it should be private. It shouldn't be yelling out your name and your details and ... your private business.

— Australian Capital Territory

People with hearing or language difficulties can be harshly affected by a lack of private spaces. Where the environment is noisy or security screens are used, communication can be challenging if not impossible.

[When you ask for some privacy] they don't care. They see no issue with that. And now with your COVID screens, that's just made it even harder. And I've watched elderly ladies who come in and they're just trying to sort something out about change their address or something like that and they can't hear and the person then just starts yelling through the screen at them and it's like, are you [serious]? Have a little bit of respect for a human being. Yeah, I just think there's a lot to be done.

— Rural New South Wales

A lack of private spaces affects women's willingness to disclose critical information to frontline workers, including information about family violence, medical conditions, caring responsibilities, homelessness and other deeply personal matters

Services Australia is subject to strong privacy protections and has strict internal policies in place, but those protections are at odds with service delivery within Service Centres because people can hear information exchanges. That includes even basic information that is very sensitive.

Trans people won't go in [to a Service Centre] if they haven't changed their name because they're outed continuously. And as I said, it's worse in country towns for that simple reason that five people in the village are all sitting in the same space hearing a name. It's not as bad [in the capital city] because ... everybody in that room doesn't know you and isn't connected with you in a way that country towns are. So, it is a very different space [in a regional area] ... and it literally is just dehumanising to out themselves in that space.

— Rural New South Wales

The open layout also creates an environment where individuals are exposed to the anger and distress of others. That can be uncomfortable or stressful, and can escalate already difficult situations.

Quite often [talking to a Centrelink worker] is challenging because I've been in [the Service Centre] and there's been a young parent with a young child that's really distressed and this parent is trying to make this phone call to Centrelink as well too. Yeah ... so that means that she might not get a payment.

— Very remote South Australia

You still sit and wait and wait and wait and there's no privacy and confidentiality. You stand up at that counter. They want you to tell everything, even when you've last farted and every person is sitting there listening and hearing what you're saying, there is absolutely no privacy.

— Rural New South Wales

EJA is aware that since early 2024, Services Australia has begun significant efforts to improve the layout of Centrelink offices to improve people's comfort and improve services provision. We understand that as of 30 September 2024, 122 service centres have undergone refit/re-design.³

EJA urges Services Australia to continue to roll out improved centre design and to monitor its effectiveness, drawing on input from Services Australia staff and customers, to facilitate ongoing improvement.

Recommendation 7: That Services Australia increase availability of safe, private interview spaces at Service Centres.

Recommendation 8: That Services Australia regularly seek input from service users ('customers') and community organisations on their privacy concerns and experiences, and design Service Centres guided by that input.

Recommendation 9: That Services Australia improve training for frontline staff on the importance of privacy and how to handle sensitive conversations discreetly.

³ This accounts for with 31 in New South Wales, 23 in Victoria, 27 in Queensland, 13 in Western Australia, 13 in South Australia, 10 in Tasmania, 3 in the Australian Capital Territory and 2 in the Northern Territory.

Negative interactions with frontline staff

It is not uncommon for women to experience substantial issues and poor outcomes after interacting with frontline staff, including staff providing unclear information and different staff providing conflicting information.

Women also reported feeling stigmatised and discriminated against, with some women re-traumatised by the process through which they are required to communicate information about difficult experiences to staff.

Many service providers framed engagement with Service Centre staff as tiring and designed to make people give up.

Many service providers framed engagement with Service Centre staff as tiring and designed to make people give up.

It feels like our current Centrelink system is meant for you to give up. So instead of having a window in where you talk to somebody face-to-face, there is a system of barriers where you can't even have that conversation.

— New South Wales

They spent hours, bloody hours queuing at Centrelink, often in the heat, often [to see] people who don't understand them and to be honest, don't want to understand them sometimes.

— Remote Northern Territory

The consequences of negative interactions include people becoming frustrated, which at times has a significant effect on mental health, exacerbating existing vulnerabilities.

We see the heightened impact on people's mental health ... They go to Centrelink, they're just turned back, they come here and then everything falls apart.

— Remote Queensland

It's kind of like the more people go [to the Service Centre], the more they just take a bit more away from the person ... a bit more of themselves ... just every little bit.

— Remote New South Wales

The provision of incorrect or incomplete information by frontline staff was particularly pronounced when staff were required to deal with complex situations or vulnerable and distressed women.

Usually, [women] don't know their partner's income or assets, and they're usually turned away [from the Service Centre] before they even get started because they don't have that information. And usually locally, the social workers don't know the [family violence] exemptions. It's in the [Social Security] Guide. And so [the staff's lack of training is] stopping [women] at the door before they get in.

— Rural Victoria

[For trans women] the first barrier is actually approaching Centrelink because the first thing that Centrelink does is call you by your legal name. And ... if you're impoverished living in outback New South Wales, \$195 is a lot of money to change your name legally ... [It reflects a] lack of training for Centrelink workers in the bush. They say, 'Well why don't you just change your name?' I don't think they really understand ... Yes, a name is important, but so is food, so is shelter. But [they say,] 'If it was that important, you'd forego food.'

— Rural New South Wales

Many service providers referred to Services Australia's service provision undermining a person's dignity, which formed a barrier to social security entitlement.

[The social security system] kind of feels like the opposite to the court system and there is a presumption of guilt. So, the way of putting it is that you are guilty and then you have to come and actually prove to Centrelink that in fact, no, you're innocent and deserving of a payment.

— Remote Northern Territory

Some community workers also reported Services Australia staff engaging in discriminatory behaviour.

I've witnessed Centrelink staff within their Centrelink office ... I've seen the difference in the way that they behave and speak and treat someone who is Aboriginal compared to Western. And I've also witnessed the different way that staff behave and speak when there is someone who has a disability. This very, very

intelligent lady, she had issues with being able to verbalise what she needed to ask ... so she just needed to take time ... but it was taken to assume that she was stupid and couldn't understand anything. The way she was spoken to, was the most derogatory way. It was just absolutely appalling. I've seen it and it happens so many times.

— Remote New South Wales

Some service providers also expressed frustration at Service Centre staff displaying a lack of connection to and understanding of the communities they were there to assist.

I think the first step would be greater cultural input. So, if each regional [Services Australia] office actually engaged with the cultural elders of that region. Just to ensure that any education, information, or consultation that Centrelink do is done right.

— Very remote Northern Territory

Recommendation 10: That Services Australia implement a 'No Wrong Door' policy, including guiding people to appropriate assistance rather than turning people away, and establish clear pathways for escalating complex cases to more experienced staff or specialised support services.

Recommendation 11: That Services Australia train and support frontline workers and social workers to make proactive referrals to external local support services.

Recommendation 12: That Services Australia support frontline workers and social workers to attend local interagency network meetings, and provide local support service with direct contact details.

Recommendation 13: That Services Australia support and train frontline workers to provide plain language explanations.

Recommendation 14: That Services Australia improve staff support and training on sensitive and complex situations, including training about family and domestic violence, First Nations cultural competence and LGBTQI competence.

Recommendation 15: That Services Australia integrate basic mental health training for frontline staff to assist distressed clients, and establish partnerships with local mental health services for quick referrals when needed.

Recommendation 16: That Services Australia create protocols for respectful interaction with transgender service users, including using preferred names regardless of legal status.

Securitisation of Service Centres

In some cases, the amount of security precautions mean that Service Centres resemble places of detention, a development that is at odds with their role as hubs of support and assistance. The routine presence of security guards, security screens separating frontline workers and clients, and locked amenities makes these spaces uncomfortable and intimidating. At worst, some Service Centres have front doors locked, with security giving permission for people to enter after lining up in the weather for extended periods.

The first people you see to walk through the door is the security guard ... It's a horrible place to be. It's really horrible.

— Rural New South Wales

For some women, particularly those who have been the target of violence and other abuse, including family and community violence, the heavily securitised environment of Service Centres creates a barrier to social security access. Women with ongoing trauma after violence or harassment from police or security personnel may stay away from their local Service Centre. If they do attend, they may not disclose personal information such as experiences of family violence, homelessness, and other sensitive issues.

While security measures are necessary to ensure the safety of both staff and clients, current approaches have failed to take a customer-centric approach. Community workers observed that some of this securitisation of Service Centres coincided

with the COVID-19 pandemic, as physical barriers eroded the human element of service provision.

Pre-COVID we used to have [a Service Centre worker] come out and ... go to the queue and just say, 'Hey, what are you here for?' 'Do you think you might want to go to the computer?' Or 'Oh yeah, someone will help you with that' ... After COVID, we came up against a screen and [the worker] just sat behind a desk and no one moved. And all you see now is that security guard. We need to take it back to that human focus rather than that churning-out-a-number situation.

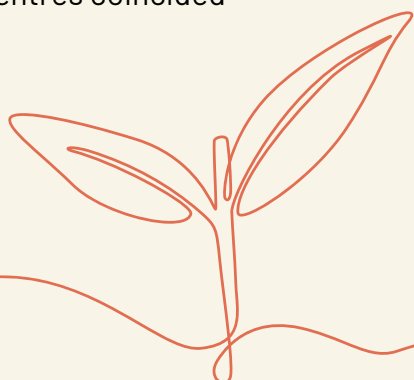
— Rural Queensland

This minimal control clients have over basic amenities reinforces a sense of powerlessness, which some women find degrading.

They even lock the toilets in the Centrelink office. You have to go to that front counter to ask for the key, to then walk back again and go to the bathroom, and then come back and bring them the key, and then go and sit down again over that end and wait your turn again. [You] then go back up there and then come over here and let everyone know all of your business, and then go [up to the counter to find out that] ... you haven't got this form, so you feel like an idiot. You just get more degraded and degraded - degraded until you just think, 'oh my God'. And then the people have got to come back again and it's just a horrible, horrible experience.

— Rural New South Wales

In some cases, the amount of security precautions mean that Service Centres resemble places of detention



Despite the 2023 *Services Australia Security Risk Management Review*'s failure to include input from service users or community organisations, it did recommend that Services Australia take a customer-centric approach to policy development and program design regarding risk management. EJA strongly supports that recommendation, noting a customer-centric approach relies on the direct input of customers from diverse cohorts.

Recommendation 17: That Services Australia ensure customer and community organisation input into future security and security-related reviews, policies and procedures.

Recommendation 18: That Services Australia ensure security guards are trained to interact with customers in a productive and sensitive manner, with the skills to de-escalate situations wherever possible.

Recommendation 19: That Services Australia regularly provide comprehensive training for all staff on de-escalation techniques, cultural sensitivity, and trauma-informed care to reduce reliance on physical security measures.

Difficulty accessing social workers

Centrelink social workers are uniquely equipped to work with clients with complex needs, helping vulnerable people and those in crisis to access correct payments, avoid debts and access appeals processes. EJA's earlier research into the experience of women escaping domestic violence clearly indicates better outcomes for clients when they have timely access to Centrelink social workers.

Face-to-face interviews increase the likelihood of disclosure of difficult or traumatic issues given workers are better able to build rapport than during a telephone call, facilitate social workers picking up non-verbal cues, and provide a strong means of delivering trauma-informed care. Face-to-face interactions with social workers are highly valued because they increase people's confidence that the social worker understands them and the gravity of their circumstances. Centrelink social workers are well-placed to make warm referrals to local community support organisations. Adequate social worker staffing also removes the burden from frontline staff struggling to manage heightened behaviours of people who are angry or in distress.

Service providers reported that vulnerable clients were often not offered access to a social worker, particularly face-to-face support, when that would have been an effective means to meet their clients' needs, including where they had uncertain digital and telephone access.

EJA's earlier research into the experience of women escaping domestic violence clearly indicates better outcomes for clients when they have timely access to Centrelink social workers.

Service providers also reported an observed reduction in the number of social workers available for face-to-face support over the last few years, with this decrease directly reducing women's ability to access timely and effective in-person support.

So just in our local office, we used to have a team of at least three social workers ... And then during COVID they kind of dropped off and it just ended up being maybe two. One of them was a particularly excellent social worker, always accessible. We could phone or email them directly with questions. They were really good about getting crisis payments through. They were just a real ally in that space. And then it stopped.

— Regional New South Wales

Women reported frustration at being redirected to phone-based social work services after making their way to a service centre. At times, those referrals were distressing for women in crisis.

It can be really hard, especially since there are no social workers in [this large] region. They're speaking to someone over the phone, and that person over the phone doesn't really know the cultural factors that may be affecting their situation. As well, a social worker might not be readily available, so they might have to wait around at Centrelink before it gets finalised. That being said, the social workers I've spoken with, they do their best, especially trying to find a safe bank account for that money to be deposited in. They want to ensure that the person they're escaping from doesn't have access to that account.

— Very remote Northern Territory

EJA understands that as of 30 June 2024, Services Australia employed 642 social workers in 211 locations across Australia. That included 371 social workers in 182 Services Centres and 187 social workers in Smart Centres.

Robodebt Royal Commission recommendation 13.4 was that Services Australia provide 'increased social worker support (for both recipients and staff), and better referral processes to enable this support'. EJA welcomed the 2024 announcement that Services Australia would be recruiting 50 additional social workers to add to their staff in the 2024-25 year.

The 2023 *Services Australia Security Risk Management Review* included a recommendation that the allocation of social workers within Service Centres should take into account the importance of their support role within Service Centres. EJA is reassured that this recommendation is being acted upon, noting Services Australia's recent efforts to ensure on-site social workers in locations where their services are in greatest demand, with social workers located in 49 of the top 50 sites (data correct as of September 2024).

EJA urges Services Australia to continue to open up social worker support to recipients and staff, to more fully fulfil Robodebt Royal Commission recommendation 13.4 and ensure social worker support to women in 4R Australia.

Recommendation 20: That Services Australia increase face-to-face social worker services within Service Centres, taking into account the importance of their support role.

Inaccessible locations

For many women, particularly those in 4R areas, traveling to and from the closest Service Centre poses numerous logistical and financial barriers. The fact that women often make considerable effort to get to a Service Centre indicates the high value they place on face-to-face services and/or limitations they face around phone or digital engagement.

In many 4R areas, public transport is either extremely limited or non-existent, creating a significant barrier for those without a personal vehicle.

You've got to be able to afford [to travel into a Service Centre]... You've got to have a vehicle. There is no public transport in any of the places that I know that we service. [Nearby town] doesn't have any.

— Rural Western Australia

In the rural areas, my experience there's real basic stuff like ... if you want to go into the [Service] Centre - you can't navigate or you don't have credit or you are in an area that has really bad service and it keeps cutting you off and you've spent six hours on the phone. You actually want to go into the [Service Centre], but you can't get there because you don't have a car. There is no public transport, and you can't afford a taxi.

— Rural Queensland

A lot of the time [our clients] don't have the means [to access a Service Centre]. They don't have transport, a computer or credit or whatever it might be to [access Centrelink].

— Rural Queensland

The fact that women often make considerable effort to get to a Service Centre indicates the high value they place on face-to-face services

For some women accessing a Service Centre requires a multi-day journey, adding significant time and cost barriers.

Community transport, that's not an option. But coming from [very remote town]... families would need to go down the day before, stay the night, do the [Centrelink task], stay the night, get the bus back.

— Remote New South Wales

Recent relocation of some Service Centres has exacerbated accessibility issues, particularly where the Service Centre has moved further away from town centres or public transport hubs, noting access can be more difficult where a person is struggling to travel with impaired mobility resulting from ill health, injury or disability.

[The Service Centre] is more difficult for people to access now that it's moved than when it was here in the middle of town ... There definitely are still people across the road going into [the old Service Centre location] to ask, 'Where do we go?' Not everybody in the community is aware that it's relocated. If they're on foot, now it's a hike to walk out there.

— Rural Queensland

Now Services Australia is located differently ... in an area that's not very accessible. If people are in crisis, the area is quite dangerous.

— Rural Queensland

Where transport options exist, they are often limited, unreliable, or unsafe, particularly in remote areas.

The train isn't even open to the public. The flights that we have ... they're not super reliable and also incredibly expensive. We do have buses. We've got [bus company 1] and [bus company 2]. They are also expensive. And in particular with [bus company 2], a lot of clients fall into a trap where they put it on [a Centrepay] payment plan ... But the [bus company 2] is probably the safest option because [bus company 1] leaves at one o'clock at night ... It travels through at night. Yeah, it's not so safe and [bus company 1] isn't usually that reliable. It's not a preference for clients.

— Very remote Northern Territory

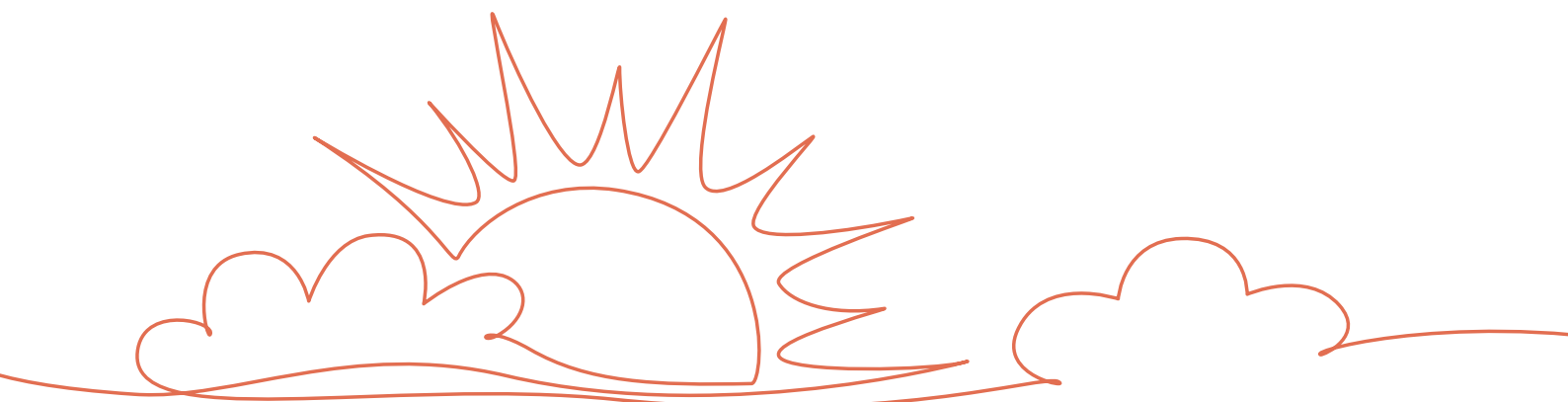


Some women are unable to access their social security entitlement because they simply can't afford the resources required to access it, including the phone/digital technology to access remotely and transport to attend a Service Centre. This points to the critical need for face-to-face servicing through outreach.

Recommendation 21: That Services Australia increase the capacity of outreach services to provide face-to-face support in regional, rural, remote and very remote areas.

Recommendation 22: That Services Australia participate in local community events to provide face-to-face access in remote areas, for example, Aboriginal Justice Days in Western Australia.

Some women are unable to access their social security entitlement because they simply can't afford the resources required to access it



Difficulty accessing interpreters

Limited accessibility to non-English language services, including print resources and face-to-face interpreters at Centrelink offices, creates significant hurdles for non-English-speaking women, often leading to frustration and difficulty accessing social security entitlements. That includes First Nations women in remote and very remote Australia whose first language is not English.

One of the biggest issues that clients face is not having services in their first, second, third language and not having access to an interpreter. So then trying to navigate a system that's in the English language, and if you're talking to someone over the phone as well, that can make things more difficult in terms of understanding because you can't see them. [That] creates such a barrier for people. Rarely English is a person's first language ... and it's not what they would speak at home with their family.

— Very remote Northern Territory

There are no interpreters here. So, you've got all of that [Centrelink paperwork] stuff in front of you. And so, if you don't have someone that's advocating for you, you're doing it all by yourself, which is incredibly difficult, which is why a lot of people just give up.

— Remote Northern Territory

Service providers reported a noticeable reduction in the availability of interpreters and multicultural support staff at service centres in the last few years; services that are critical to address language barriers.

Before COVID ... [the Service Centre] had people that speak all the different languages ... bi-cultural workers. They would have people there that spoke those languages ... Now they can't even keep social workers.

— Rural Victoria

The existing interpreter services, particularly phone-based services, are often difficult to access, leading to frustration and potential miscommunication.

Usually, I BYO an interpreter [because when we call the Services Australia's] interpreter line ... yeah, they're really very, very difficult.

— Rural Victoria

The majority of my CALD clients, often they will rely on their adult children to help them ... when you can't get interpreters, even though it's not ideal.

— Rural Victoria



Language barriers can lead to misunderstandings about social security law and policy, including reporting and other requirements, potentially resulting in incorrect payments, overpayments or compliance issues. Many women become reliant on community organisations or family members to act as interpreters, which can compromise privacy, independence and accuracy. Without access to reliable face-to-face interpreters, some women give up.

Recommendation 23: That Services Australia employ more face-to-face interpreters, especially for commonly spoken languages in regional, rural, remote and very remote areas, including Aboriginal language interpreters.

Recommendation 24: That Services Australia collaborate with local multicultural organisations to provide face-to-face interpreter services, particularly in areas where Services Australia may not have regular access to interpreters.

Recommendation 25: That Services Australia implement high-quality video interpretation services as a step up from phone interpretation, where face-to-face interpreters are not available.

Recommendation 26: That Services Australia expand the employment of bi-cultural and bi-lingual staff at Centrelink offices, to assist people to disclose relevant information and navigate the system.

Recommendation 27: That Services Australia increase awareness of the Community Language Allowance (CLA) to incentivise recruitment of frontline staff who speak a language other than English including international languages, First Nations languages and Auslan.

Agents and Access Points

Agents and Access Points are hosted by organisations external to Services Australia. Funded through the National Agent & Access Points (NAAP) Program, Agents and Access Points aim to 'enable regional, remote and very remote customers to access government services without needing to travel long distances to visit a service centre'.

Agents and Access Points provide people with self-service equipment including phones, Wi-Fi, computers with internet connection, and scanning equipment to upload documents. Agents are funded to provide supported assistance for people to sign up for digital services, help them to access these digital services, and to make referrals to other support services. Access Points do not have on-site staff providing assistance.

Agents are not Services Australia staff. They cannot make decisions about payments, review or vary claims/payments, help to complete or submit claims on people's behalf. They have no delegation to make updates to customers' records, or to access Authorised Review Officers (AROs) or Subject Matter Experts (SMEs). Instead, Agents and staff at Access Points have access to 'Silver Service', a priority line to the Smart Centre network for Agents only, for help with complex customer enquiries.

Without access to reliable face-to-face interpreters, some women give up.

Agents and Access Points provide critical access for many women in 4R Australia. Some service providers reported positive outcomes, noting that some local Agents were working beyond their allocated hours to meet community demand because they knew how much the community relied on their support. One community worker from an organisation providing a Services Australia Agent service reported:

We don't get that support from Services Australia. We have to Google it ourselves ... Pretty much everything we know, we learn ourselves ... we have the Silver Service line [but we] could be on the phone for 40 minutes, waiting for help there and in complex cases, sometimes it's an hour, two hours ...

We don't even get to have to have a Services Australia officer, we have to just do it ourselves and just say, 'There's a self-service ... help yourself'. But when we got the contract [from Services Australia], we put it to the Board. The Board said we wanted a Service Australia officer to be able to sit in there and help clients and do it ... But they don't cover the cost of that staff member ... We have some days, there [are] two of us in there, one setting up emails for clients, one setting up Medicare. My God.

Service providers expressed some frustration regarding the limitations of Agents and Access Points, including women receiving:

The most common frustration reported by service providers about Agents and staff hosting Access Points was that they were unable to answer questions regarding social security eligibility, income tests and mutual obligations requirements.

Delayed or incomplete assistance

Agents and Access Points are severely constrained in their ability to provide comprehensive assistance. Women were often unable to receive timely or comprehensive support due to the limited capabilities of Agents. In fact, the most common frustration reported by service providers about Agents and staff hosting Access Points was that they were unable to answer questions regarding social security eligibility, income tests and mutual obligations requirements.

The Agent is only housed by a CDP agency. They're not actually a Centrelink employee, so they can't actually give out any Centrelink information. They can turn the computer on, right? And, say, 'Press this button, press that button'.

— Rural Western Australia

Service providers further reported that Agents would often give incorrect advice to women about their eligibility or other social security issues. This often led to extremely negative outcomes, such as missing a statutory limitation date or invalidating a potential legal recourse such as an appeal.

Some Agents are incompetent. Some Agents go above and beyond ... no thanks to Services Australia's training, but others are causing more harm than good. For example, if the Agent is representing Centrelink, they can make incorrect and informal decisions about a person's situation. The issue being that if Centrelink makes a decision or tells a person wrong information, there is greater chance of legal recourse i.e. internal appeals process or Compensation for Detriment caused by Defective Administration. None of this is possible through interaction with a Services Australia agent.

— Queensland

A default to digital options

The emphasis on self-service equipment and digital access in Agents and Access Points fails to address the genuine needs of community members who lack digital literacy or otherwise require more comprehensive support to access their social security entitlement.

There's a real disconnect with the reality of how long things take and the complexities of what walks through the door. It's just not about having a computer sitting in the corner and someone to come in and operate it ... it's about having the options available. [Women] need support. They call for it.

— Remote New South Wales

Privacy issues

In small communities, a lack of alternatives to local Agents can compromise privacy, including people having to disclose highly personal and sensitive information to a neighbour or relative. There are often no private rooms, with phones and computers located in a public space.

A lot of the women in this area, they don't have a smartphone or don't have internet, and they need assistance speaking to Centrelink. They need to go to the Agent, which is a local [organisation], and that means having to talk about their private issues with their relative or neighbours. If not their own relative, then a relative of their partner or their next-door neighbours.

— Rural Victoria

A cultural disconnect

Some communities have experienced the closure of culturally appropriate Agent services, forcing women into mainstream services that do not adequately meet their needs.

[Our organisation] had its own Centrelink Agent but they closed it ... before COVID. [Our organisation] said they didn't have capacity or funding to keep running it. It was a culturally safe service. It was then just shut down because [Services Australia] said everyone needed to be mainstreamed and it all needed to go to [the Service Centre in the nearest remote town].

— Remote Northern Territory

Provision of services by Agents and Access Point staff can also conflict with cultural requirements in other ways. For example, a very remote legal service provided a recent example where a female client had a large debt. This debt had substantially increased over many years, partly as the result of the client having a 'poison cousin' relationship with the local Agent.⁴ According to her cultural code of conduct, the client was prohibited from speaking to a poison cousin and had not worked out an alternative way of contacting Services Australia to discuss the debt.

In small communities, a lack of alternatives to local Agents can compromise privacy, including people having to disclose highly personal and sensitive information to a neighbour or relative.

⁴ In some First Nations families, there are certain relationships which need to be avoided. The relationship is often not a 'cousin' relationship in a standard English sense. Your poison cousin should not be spoken to or even named. According to lore, you should not spend time with this person or be too close physically with them, such as in the same room. Additionally, the term 'poison' can imply to non-Indigenous people that this is a negative relationship, however in Indigenous kinship systems avoidance relationships are a positive relationship that is often accompanied by a sense of deep respect. (citation Indigenous protocols for lawyers, second edition, 2015 Law Society Northern Territory)

The burden on individual staff and community organisations

Given the limited services that Agents are funded to provide, the effectiveness of Agents and Access Points is often dependent on the skills and determination of individual workers, leading to inconsistent experiences across different locations.

[When I compare one Agent] to the [Agent in the other town], it is a different experience based on the worker that's there. She's helpful. She's really, really good. So it depends on [the worker] who helps you.

— Remote New South Wales

I think our Agent's very good. It's like us having our own customer service officer. It has been huge for [our community], especially with complex cases where we will sit down and go through the paperwork with clients. Our end is good. Then when it gets submitted to Centrelink, it takes six to eight weeks for them to have that claim processed.

— Remote New South Wales

Individual workers should not feel pressured to work beyond their paid hours or to go 'above and beyond' just to secure a customer's social security entitlement. Local organisations are also bearing some of the burden, drawing on external funding to fill the gaps that result from inadequate funding from Services Australia.

Unfortunately, we only have [one Agent worker] out here who has to do this whole community. You'd think there would have been services funded ... to be helping her out. She's been doing this for years on her own. I think Centrelink doesn't give her enough credit. They don't give her enough funding either. And she just does it because there is nobody else here. Like that's when she's crook, she can't have a whole week off to recover because [the community] can't afford it, you know, there's nobody else here.

— Very remote Queensland

A lot of our Agents are in neighbourhood centres. They're actually doing the work of Centrelink there, and they're not paid to do that and they haven't got the powers. They're just a person that's there on their [clients'] behalf.

— Rural Queensland

Attention is required to the exploitation and underpayment of Agents and the community services providing Access Points, with an urgent need to ensure funding meets demand.

Recommendation 28: That Services Australia and the National Indigenous Australian Agency significantly increase funding for Agents and Access Points to ensure adequate staffing and resources.

Recommendation 29: That Services Australia prioritise the establishment and maintenance of culturally safe Agent services, particularly in First Nations communities.

Recommendation 30: That Services Australia increase training and support to Agent staff to ensure consistent, high-quality service across all locations.

Recommendation 31: That Services Australia implement measures to protect privacy in small communities, such as options for remote consultation with Services Australia staff from other areas.

Recommendation 32: That Services Australia develop and support Agents and Access Points to provide flexible service models adaptable to the specific needs of different communities, rather than a one-size-fits-all approach.

Recommendation 33: That Services Australia provide greater support to Agents and Access Points, including direct contact with subject matter experts within Services Australia.

Remote Servicing Teams and Mobile Service Centres

Remote Servicing Teams

Remote Servicing Teams (RSTs) represent Services Australia's effort to bridge the vast distances that separate many remote communities from traditional Service Centres. As of April 2024, 27 RSTs with 91 staff members were providing face-to-face and virtual services in 335 remote locations in the Northern Territory, Queensland, Western Australia, South Australia and Tasmania.

RSTs provide a critical service to under-served remote communities and foster positive community relationships.

Remote towns and communities rely on RST visits, with RSTs equipped with modern technology and training to provide a range of services. RSTs have the same authority as service officer in a Service Centre, which can speed up claims processing and changes to entitlements. Centrelink social workers, Financial Information Service (FIS) officers and Indigenous Service Officers (ISO) can also provide valuable services as part of RSTs. Additional to one-on-one assistance, RSTs provide updates to community organisations on social security and service changes.

Case study – Judy

Judy is a young First Nations woman living in remote Australia. She has a chronic illness that is significantly debilitating. Due to her chronic illness, she is unable to work, so has been receiving JobSeeker Payment for many years. Her situation is complicated by having to fulfil mutual obligation requirements, including job applications and appointments with job service providers, despite her significant health challenges.

Judy applied for Disability Support Pension (DSP) but was rejected because Services Australia deemed her condition was not 'reasonably treated', which would require her seeking treatment from a specialist in the nearest city, more than 1000km away.

A year after being denied DSP, Judy visited a drop-in clinic run by Services Australia's Remote Servicing Team (RST) and an EJA member legal service. The RST sat down with Judy, listened while she explained her situation, then considered the reality of Judy's location. They agreed with Judy's Job Capacity Assessor that it was not reasonable for Judy to travel to the city to access further treatment, given local road conditions, lack of public transport and Judy's health. Judy was granted DSP.

RSTs provide a critical service to under-served remote communities and foster positive community relationships. Their work is particularly effective when delivered in conjunction with other service organisations, including government and community organisations.

[We have open days here] where the Department of Transport are out there, to do some licensing stuff ... Centrelink Remote Services Team, [our community legal service], and maybe [other local organisations] will be out there. So, we can do a one-stop-shop type thing for the community. It's great.

– Rural Western Australia



There's a pressing need for on-the-ground officers to be able to make things happen on the spot to ensure timely access to social security entitlements and reduce the likelihood of debts and the quantum of debts. That includes capacity to change a person's record, contact subject matter experts and make decisions.

Remote communities need to be able to access Centrelink officers on the ground who have the authority to log into client records, and with the delegation to make changes to a person's record and liaise with appropriately delegated staff to make those changes.

– Statewide Queensland

Case study – Margaret

Margaret, a middle-aged First Nations woman, lives on a very remote island. She has been receiving JobSeeker payment for many years despite having a significant disability. Margaret struggled to fulfil mutual obligations requirements, including job applications and appointments with job service providers. Access to government services was particularly difficult for Margaret, as the nearest Services Australia Service Centre was located on mainland Australia and required air travel for her to reach it.

A turning point came when a Remote Servicing Team (RST) and EJA member legal service visited Margaret's community through a drop-in clinic. Margaret met with a Services Australia worker who helped her initiate a claim for Disability Support Pension (DSP). The legal service then assisted by requesting copies of Margaret's medical records from healthcare practitioners on her behalf.

Once the legal service received Margaret's medical records, they coordinated with the RST to ensure the documentation was lodged in support of her DSP claim. The RST then planned their next community visit, bringing along a Job Capacity Assessor. During this visit, Margaret completed her Job Capacity Assessment (JCA) with this assessor in her home community. Margaret was granted DSP.

Despite the enormous value of RSTs, community service providers sought attention to the following:

Frequency of visits does not meet demand

Service providers in remote Australia and those who provide outreach to these regions report a significant reduction in the frequency of RST visits to some communities over recent years, particularly after the height of the COVID-19 pandemic.

This has had a significant impact in [our state], which is disappointing given the generally positive relationship that has been built between towns and communities and the Services Australia Remote Servicing Team.

— Remote Queensland

A lot of the people that we work with, English is like their seventh language, so [the value is] just the fact that it's outreach ... They go out once a fortnight to each community centre and they're there for at least two hours, which is good, but there's lots of people that want to speak to them.

— Remote Northern Territory

We been fighting for [Services Australia] to be able to do outreach ... since COVID basically, 'cos since COVID finished ... they've got to go through all sorts of bureaucracy to try to do outreach.

— Rural Western Australia

Lack of relationship with community

In many locations, the current model doesn't allow for adequate community engagement and relationship building, which has the potential to build trust and integrate service provision across community and government sectors.

Remote servicing used to work quite well. They used to go to Agents in two or three communities and see individual people and also usually meet with the elders of community, or if it's a town go to a town meeting or an interagency with different agencies covering a wide area. The Remote Servicing Team would give all the local updates and all changes. People like to know what's happening and like the updates and like to be able to ask questions.

— Rural Western Australia

Better publicising of events and coordination with local organisations has the potential to greatly increase the reach and effectiveness of events. Clear two-way communication channels for RSTs are needed to understand and provide feedback on community needs, cultural considerations, and stakeholder relationships.

I think [that the] more and more remote a location is, there needs to be more face-to-face support. There is an outreach service that Centrelink comes through. I think it happens around once every two months, but they don't make it very known that their presence is there ... Perhaps more people could reach out and get that support had they known that there [are] workers actually close by and they can get that assistance.

— Regional New South Wales



Mobile Service Centres

Mobile Service Centres (MSCs) are Services Australia's 'big blue trucks' that travel throughout regional and rural Australia. These mobile units are designed to operate similarly to a traditional Service Centre, with interview rooms, service desks, waiting areas, self-service computers and free Wi-Fi access, bringing face-to-face services directly to regional and rural Australia.

Services Australia currently operates four MSCs, each staffed with a manager, driver, two service officers, and a social worker. These teams are trained to the same standard and have similar delegation as staff in permanent Service Centres, allowing them to provide a full range of services. Notably, MSCs are also deployed to areas affected by natural disasters and other emergencies, offering critical support during times of crisis.

MSCs have proven popular, particularly following emergency situations, but also in their capacity to provide face-to-face services for women in 4R areas. Service providers are largely supportive of MSCs operating in their regions and wish to see this service expanded.

When the floods came through, [a client] mentioned how good it was when [Services Australia] brought the bus around and they had six staff from Centrelink and they went to the small towns, not just the regional hubs. And that worked really well. The ideal is that happens more.

— Rural Western Australia

I think whilst there are a lot of benefits to some stuff being streamlined digitally and online, actually [social security] is one of those more complicated things that you need that person face to face.

— Rural Western Australia

Despite their popularity, service providers argue that the effectiveness of MSCs is limited by:

Infrequent and limited coverage

The sporadic nature of MSC visits and their limited reach cause frustration for many communities.

They send the bus out to do regional tours and the [local] social work manager tries to go out on that when that goes around, which is great. But of course, it doesn't go around very often and it has set places and set times.

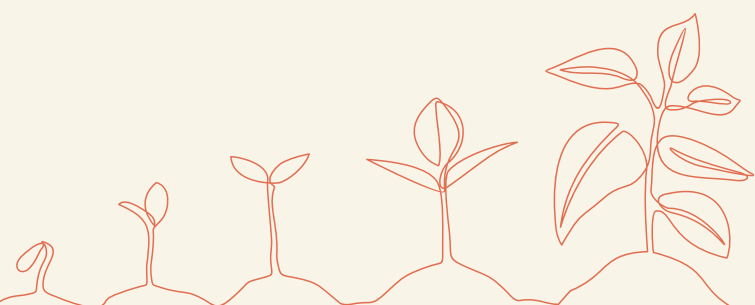
— Rural Western Australia

Limited route flexibility

MSCs often stick to established routes, potentially missing communities in greater need of services.

[The Mobile Service Centre] needs to be more regular and it needs to [go to] some of those places off the beaten path, not just the same ones all the time. They need to swap it up a bit and go to those in-between places.

— Rural Western Australia



Lack of advance notice to communities and support services

Limited communication about MSC visits results in missed opportunities for community members to access services.

We don't get a lot of notice that [the Mobile Service Centre is] going around so we can't even rally people to get there. And we usually find out through the grapevine from someone inconspicuous that it's even coming. They don't have a good Agency network that they share information with.

— Rural Western Australia

Lack of interface with support services

Service providers said they would welcome the opportunity to better coordinate with Services Australia to increase the impact of MSC visits.

[They could] partner with a few more of the agencies in town so that someone can take a bus around and pick people up and take them in, or a bit more can be planned out.

— Rural Western Australia



EJA has identified locations and organisations that would be happy to share their insights on their location and needs.

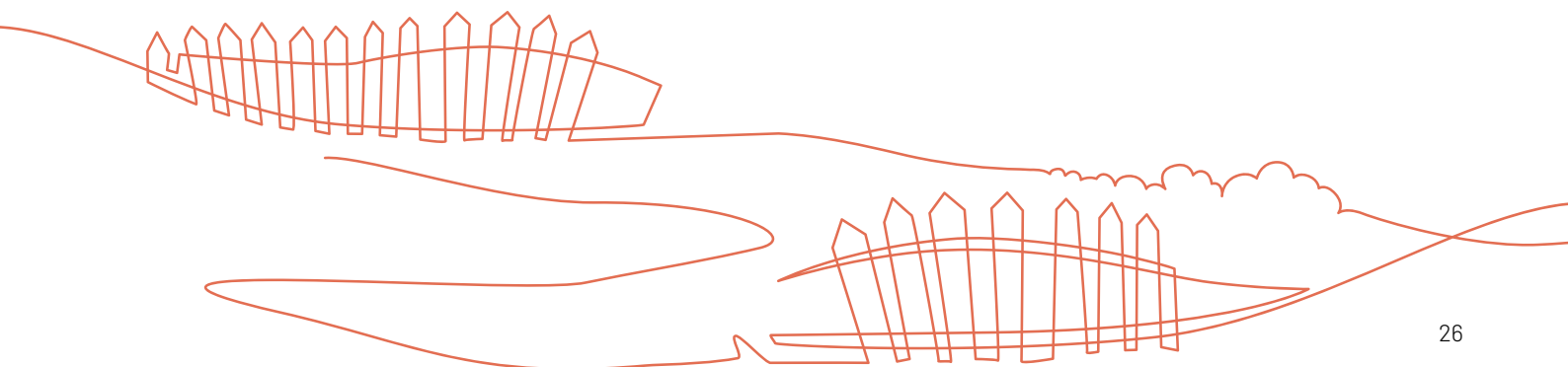
Recommendation 34: That Services Australia increase resourcing and staffing of Remote Servicing Teams and expand its fleet of Mobile Service Centres to increase the frequency of visits to regional, rural, remote and very remote areas.

Recommendation 35: That Services Australia include Indigenous Customer Service Officers and social workers in Remote Servicing Teams and Mobile Service Centre visits.

Recommendation 36: That Services Australia ensure Remote Servicing Teams and Mobile Service Centres have access to interpreters or include team members who speak local languages.

Recommendation 37: That Services Australia foster stronger partnerships with local services to better coordinate support during Remote Servicing Teams and Mobile Service Centre visits, providing a mechanism for input on community needs, cultural considerations, and scheduling of visits.

Recommendation 38: That Services Australia coordinate Remote Servicing Team and Mobile Service Centre visits with other government departments and community services to provide a 'one-stop-shop' for customers.



Community Partnership Specialist Officers

Community Partnership Specialist Officers (CPSOs) are specialist Services Australia staff who are based in community organisations through the Community Partnership Program. There are currently 27 CPSOs located in community services across Australia. While the number is limited, the impact of these officers has been significant, particularly in supporting people experiencing homelessness and those in remote communities.

MSCs often stick to established routes, potentially missing communities in greater need of services.

CPSOs represent a shift in how Services Australia engages with vulnerable people. Unlike traditional outreach programs or mobile services, each CPSO is embedded within a particular community organisation, with the aim of becoming an integral part of the local support ecosystem. This innovative approach decentralises the delivery of social security services and weaves it into the fabric of strong community support structures.

[The program] only started a little while ago and that's been brilliant. It kind of is someone who has a bit more context for understanding. [It seems like] he has more access to a wide range of services instead of when we refer to Centrelink [externally]. He has a broader knowledge so he can deal with a wider range of matters.

[Our CPSO] is kind of like an intermediary for [our Aboriginal language group] and Centrelink. When you are out-bush you, you call Steve and he can help ... He is a dedicated person that helps with [Aboriginal language group]-specific problems and is fairly responsive. He's brilliant. And people can call him directly instead of going through Centrelink long waiting times.*

— Remote Northern Territory

One particular EJA member centre works closely with CPSOs at local homelessness services. This member centre saw an opportunity when the Community Partnerships Pilot (the CPSO program predecessor) commenced in their state in 2023, establishing a face-to-face legal advice clinic at the same location as the CPSO.

The presence of CPSOs within community organisations allows for more integrated and comprehensive support services.

We start where Centrelink stops ... We focus on DSP but specialise in payment issues for people experiencing homelessness and mental health conditions ... Clients can be helped in a holistic way. Working collaboratively with Centrelink means that we can provide wraparound service.



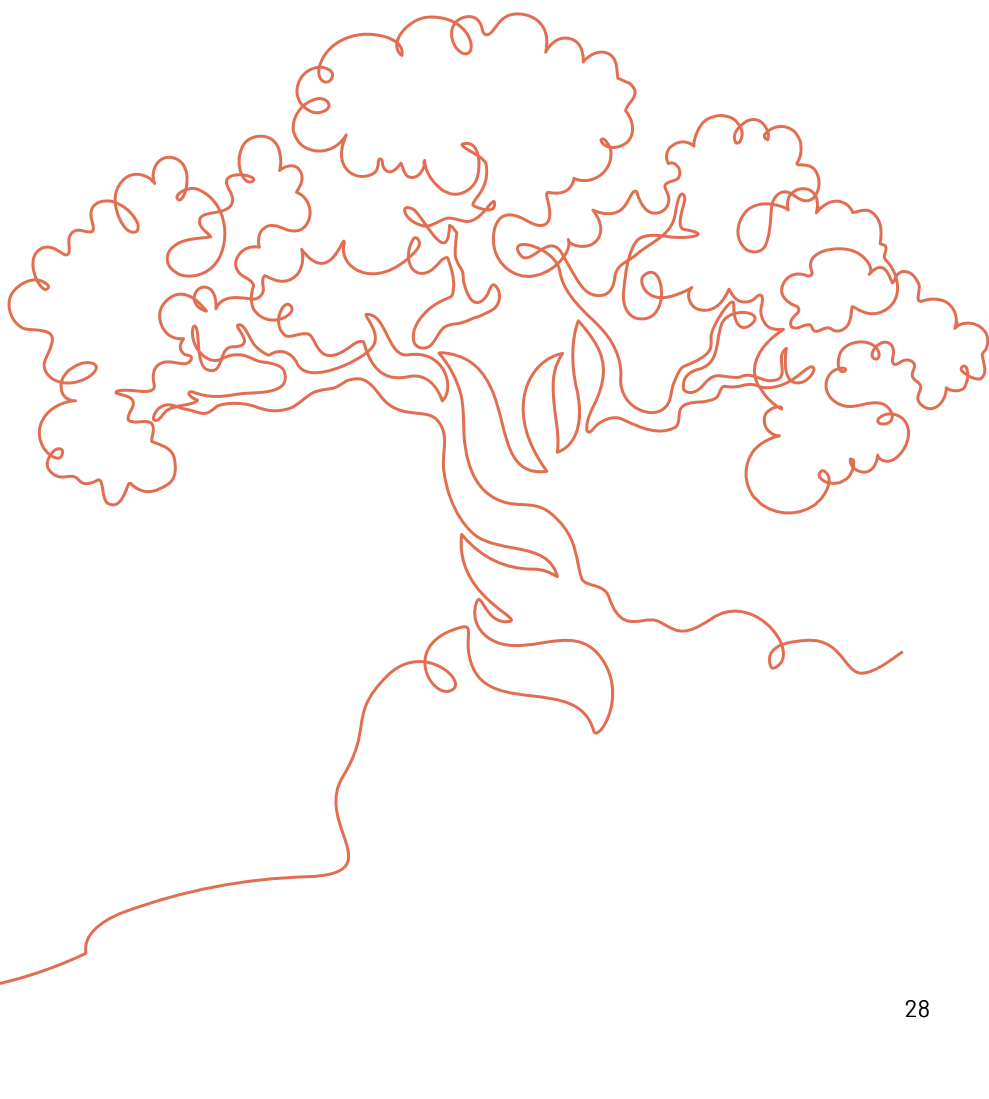
The Community Partnership Program has improved Services Australia's face-to-face service delivery to people in vulnerable circumstances, including:

- improving services to women with complex needs
- improving cultural competence and tailored support
- delivering efficient servicing enabling access to social security entitlements
- providing holistic support and direct referrals.

The benefits of CPSOs are clear, with service providers reporting largely positive experiences and outcomes with CPSOs. The major criticism is that they would like CPSOs, or other SA staff providing a similar service, in more locations.

Recommendation 39: That Services Australia continue to expand the Community Partnership Program, particularly extending reach into regional, rural and remote areas.

Recommendation 40: That Services Australia promote stronger partnerships between Community Partnership Specialist Officers and local legal, health and social services, to provide more comprehensive support.



Access to digital and phone social security services

It's so ironic that a system based on humans and humans needing support ... is becoming increasingly automated and sterile. It is really confronting because it's just not acceptable.

- Remote Northern Territory



Key findings

15. Digital exclusion disproportionately affects women in regional, rural, remote and very remote (4R) areas who cannot access reliable internet, struggle to afford it and find it difficult to understand.
16. Services Australia's rapid shift towards online services has created significant barriers for many women in 4R areas, leading to delays in payments, overpayments, and payment suspensions or cancellations.
17. Lengthy phone wait times, frequent call dropouts, and complex automated systems create frustration and can prevent women from accessing their social security entitlements.
18. Digital systems such as myGov and Centrelink online present functionality issues and navigational challenges, including problems verifying identity – even for those with high digital literacy.
19. Specific demographic groups – including non-English speakers, newly arrived migrants, transgender women, First Nations women and women with disabilities – face unique barriers in navigating digital and phone systems.
20. Technology-facilitated abuse is occurring as abusive partners or actors exploit access to people's myGov accounts for financial abuse or surveillance.
21. While digital services are useful for many, there is a critical need for accessible alternatives, including high-quality face-to-face services and paper-based options, to ensure equitable access to social security entitlements.

How does Services Australia provide digital and phone services?

The scale of Services Australia's online service delivery is vast. In 2024, there were 1.1 billion online transactions across Services Australia's services, including Centrelink, Child Support and Medicare.

Digital systems

Services Australia provides digital services in the following forms:

The Services Australia website (servicesaustralia.gov.au)

The Services Australia website publishes public information about payments and services including eligibility criteria and payment rates, income and asset test information, and a Payment Finder tool to help people identify payments they may be eligible for. The Services Australia website is heavily used, recording 186 million visits and more than 227 million page views in 2023-24.⁵

myGov

myGov provides secure access to government services and links multiple government services under one login. It operates as a central authentication portal, providing a secure means for people to access various government services, including Centrelink online.

myGov is one of the most heavily used digital platforms in Australia, and is considered 'an indispensable piece of Australian national digital infrastructure.'⁶ With approximately 26 million active accounts, including 3.3 million app users and approximately 864,000 myGov logins every day,⁷ the Commonwealth Government has committed to ongoing improvements to myGov to make it the 'go-to' place for people to access Australian Government services online.⁸

myGov also has a Digital Assistant: an embedded chatbot function to help people navigate services, provide automated responses to common queries, and direct users to relevant information and services.

Centrelink online

Through myGov, people can access Centrelink online to undertake 'self-service' for common social security transactions, including making digital claims for various payments and services, and the option to upload documents, report income, and manage payments. Through Centrelink online, people can also update their details and book appointments.

For certain payments (Youth Allowance, Age Pension, Disability Support Pension and Carer Payment), people can also view details about their payments and overpayments claimed by Services Australia through Centrelink online.

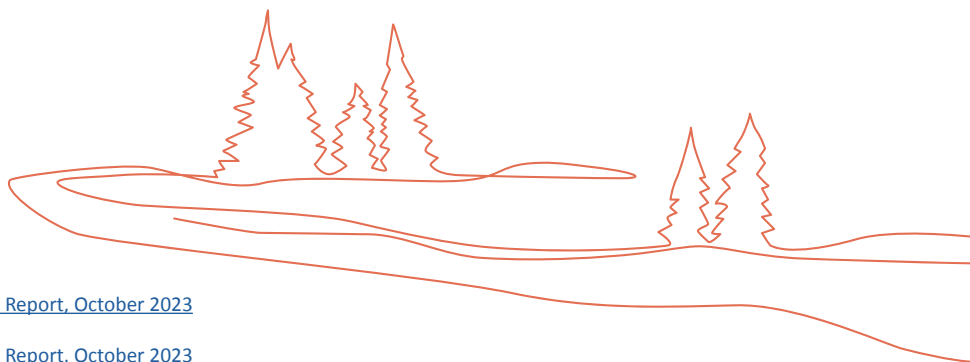
Express Plus mobile applications

Express Plus comprises a suite of mobile applications for different services including the Express Plus Centrelink mobile app. The Express Plus Centrelink mobile app allows users to track Centrelink claims, update details, view payments, upload or request documents, and view digital cards on mobile devices.

Use of the Express Plus Centrelink mobile app requires an Apple device operating iOS 13 or above, or an Android device operating 7.0 or above. It also requires that a person has a Centrelink online account and myGov account, and that the two accounts are linked.

Digital identity verification

myID (previously myGovID) is a mobile application designed to provide secure identity verification including remote identity proofing. More details regarding myID are included in Chapter 3: Proof of Identity Requirements.



⁶ [Government response to the myGov User Audit Report, October 2023](#)

⁷ [Services Australia Annual Report 2023-24](#)

⁸ [Government response to the myGov User Audit Report, October 2023](#)

Phone systems

Services Australia operates an enormous telephone system, to manage the almost 54 million calls received annually. 43 million of these calls are about Centrelink payments.⁹ The system is managed through human monitoring of digital tracking systems, with call loads spread across call centres to minimise wait times.

Services Australia has recently introduced video appointment options for:

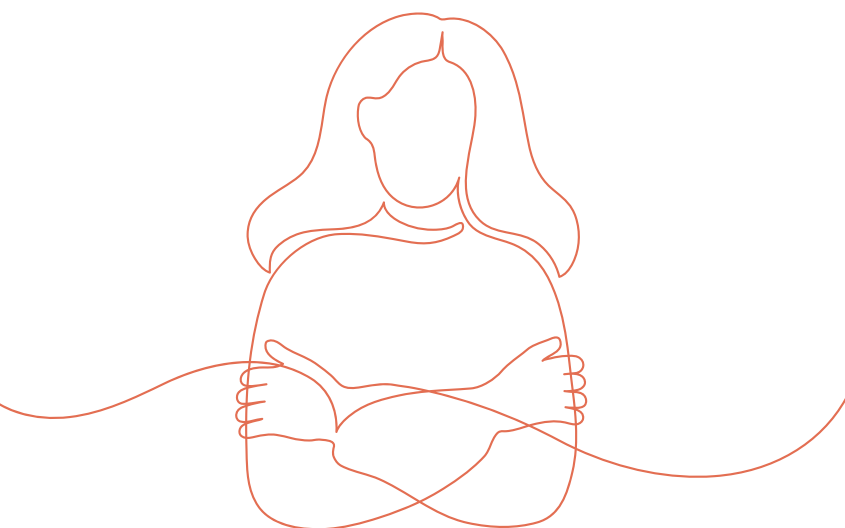
- older people who are a carer or nominee needing assistance from an Aged Care Specialist Officer
- people wanting to speak to a Financial Information Services Officer
- people receiving a Farm Household Allowance (FHA) wanting to speak with their Farm Household Case Officer (FHCO)
- students or job seekers claiming Austudy, JobSeeker Payment or Youth Allowance, to conduct a visual confirmation of identity.

The video communication option is new, so it is not referenced in this report. Notably, evaluation of the strategy is pending and, if successful, further rollout will be considered.

How well is it working?

Digital systems

Services Australia has taken vast strides in streamlining access to social security payments without requiring people to walk into a Centrelink office. When digital and phone services are designed and implemented effectively, they can be convenient and extend critical services to those who might otherwise be excluded. Digital and phone access can also produce efficiencies both for the people using them and for Services Australia, allowing resources to be reallocated where they are most needed.



When digital and phone services are designed and implemented effectively, they can be convenient and extend critical services to those who might otherwise be excluded.

During our interviews, service providers spoke highly about certain aspects of Services Australia's digital and phone servicing:

- Some young women reported a preference for mobile application-based and website servicing.

For the young people who are literate with a phone, it's great having an app where they can see their payments and how much it is. And I used a client's app yesterday just to see how much rent was getting taken out. So yeah, that's been done really well.

— Australian Capital Territory

- Prompt and responsive digital servicing in 4R regions immediately after natural disasters.

When [our town] was hit by the flood and wherever the Centrelink people popped up ... they could look up a [person's details and] as

long as the person had some form of ID and their [customer] reference number ... They were on the ball with getting those Crisis Payments with the minimal information they had. Centrelink [workers] had their laptop, did all their fancy crap, and these payments were getting sorted left, right, and centre with minimal information.

— Rural Victoria

- Positive outcomes were reported from the new phone appointment system.

If you look at where we've come, I mean even I've seen it in the last four years, it's improved significantly. I think people are happier to have phone appointments ... and so, it does make it easier for people, which is good because it takes a bit of load off outreach services as well, because people that need help will get help quite quickly ... through one of those means.

— Remote Tasmania

What needs to change?

The world is becoming increasingly digitised, and Australia's social security system is no exception. This default to digitisation is reflected in the information available about claiming social security entitlements. For instance, relevant pages on the Services Australia website generally state that the 'easiest way to claim is online', followed by instructions on how to do so. However, this is not accompanied by information about alternative ways to make a claim.

This 'digital-first' approach presents unique and significant challenges for women in 4R areas, for whom digital exclusion is more prevalent than those in metropolitan areas.¹⁰

While digital access may suit most people most of the time, it does not always deliver access for women in 4R areas. Women, particularly those in caring roles, can bear a disproportionate burden navigating social security systems. Often as primary caregivers for children, elderly parents, and family members with disabilities, women are responsible for managing not only their own social security interactions but also those of their dependents. This includes maintaining regular contact with Services Australia, updating changes in circumstances, providing documentation, and

¹⁰ Digital Inclusion Index 2023. The persistent divide between capital cities and other parts of the country continues to narrow. However, the Digital Ability gap, in particular, remains considerable. Areas outside capital cities recorded a 2023 Index score of 69.8. This is 3.4 points less than the national average, and 5.0 points less than capital cities. The Affordability gap between capital cities and other parts of the country remains narrow (0.4 points), however the Digital Ability gap remains considerable, and has increased from 7.0 to 7.7 points. [Digital Inclusion Index 2023](#)

ensuring compliance with reporting requirements across multiple payments and programs. The time and emotional effort required to navigate these systems adds significantly to women's already substantial care responsibilities.

The pace of Services Australia's digital transformation is exceeding the speed at which digital connection, capability and affordability has developed in 4R areas.

In 4R areas, this burden is intensified by limited access to reliable digital infrastructure and face-to-face services. Women must often interact with Services Australia while managing unreliable internet connections, limited phone reception, and significant travel distances to access basic services. The expectation that women will adapt to increasingly digital systems fails to acknowledge both the gendered nature of care work and the practical barriers faced by women in 4R areas.

Social security is a human right. It is crucial that Services Australia's digital transformation ensures equitable access to entitlements for everyone, regardless of gender or geographical location. That includes always offering alternatives when digital systems fail and ensuring digital systems are designed with an emphasis on the people they are meant to serve as a first priority.

When asked about the navigability of Services Australia's digital and telephone services, a strong majority of service providers said women were struggling to access their social security entitlements through digital means.

Women's access to social security through digital systems is undermined by:

Digital exclusion

Services Australia's shift towards online services assumes women have access to the internet, an email address they can regularly check, and capacity to set up a myGov account with a smart phone or computer. It also assumes that everyone trusts and knows how to engage with the online world.

These assumptions fail to account for the reality of digital exclusion in 4R Australia. The 2023 Digital Inclusion Index paints a stark picture, with two-thirds of Australians experiencing some level of digital exclusion. Digital exclusion disproportionately impacts:

- people living outside capital cities
- women
- older people
- people with low incomes
- First Nations communities
- newly arrived migrants.

The pace of Services Australia's digital transformation is exceeding the speed at which digital connection, capability and affordability has developed in 4R areas.

Despite significant rates of digital exclusion, Services Australia has been steadily reducing alternatives to online services such as paper forms, client-initiated postal communications and face-to-face servicing.

We have lots and lots [of clients], particularly elderly clients, in our region who can't access a computer. I don't know how many clients [who], when I need them to send me a document, they will have to go to the local library to access that.

— Rural New South Wales

Centrelink's answer is always 'go online, go online'. But for a lot of reasons ... some people don't want to [go] online and also, it's a very white lens to expect that everybody has a phone with credit on it or internet or a laptop and the digital literacy to do all of those things. It's just a wildly inaccessible service and then they just don't seem to be too interested in making it more accessible. It's like it's a punishment to access the payment.

— Remote Northern Territory

Having access to credit, having access to Wi-Fi is an issue. There are all these barriers that end up happening even though they may be able to theoretically access Centrelink [by having an entitlement]. There are barriers because they don't have the money that can support the resources they need to access it. Then having an appropriate [mobile phone] screen to look up [information] or people who have phones with a broken screen and smashed screen and all those kinds of issues.

— Rural Victoria

Services Australia's reliance on online services is having real consequences, including delayed payments, overpayments, payment suspensions and payment cancellations.

If you go up to [rural town], for instance, not everyone's got a computer, not everyone's got Wi-Fi, not everyone's got internet access.

— Rural Western Australia

A default to digital services has become the norm. Even when people attend Services Australia Service Centres, they are regularly directed to computers in the public waiting rooms without staff assistance.

I often get that people say they finally got to speak to a Centrelink worker and then the worker just told them to go onto myGov, which is not very helpful. And it's often just like a way for them to just get rid of them.

— Australian Capital Territory

I think there's a lot of deflection ... like just call the hotline or call this and call that ... or try it online. But for a lot of our clients, it's just not doable, especially in the mental state that they might be in as well. They can barely eat, let alone apply for things online.

— Regional New South Wales

Services Australia's reliance on online services is having real consequences, including delayed payments, overpayments, payment suspensions and payment cancellations. This is because people have been unable to claim a payment, unable to report information when required, or have not understood how to answer questions or to provide Services Australia with the information required to make an accurate assessment.

Case study – Rural Carers

Claire works as a social worker for a government health service in rural Australia. Her position is funded by the state government to assist people to seek social security assistance.

As part of her job, Claire travels to small rural and remote communities to provide social work services. Most of Claire's clients are experiencing ongoing medical conditions. Claire also regularly travels to farm households to meet with her clients.

Claire recently met with John and Susan on their farm property. John is terminally ill and Susan cares for him full-time. John and Susan were struggling financially because neither of them was able to work. The couple had never received social security before and were not aware they had any social security entitlements.

The couple's farm does not have internet connection or a phone signal, so they have to drive into the closest town to make and receive phone calls and use the internet. When Claire visited the farm, she advised the couple that Susan was likely to meet eligibility requirements for Carer Payment, and that they should make a claim. Claire was not able to download or print the relevant Carer Payment forms to bring with her to the farm because they are not available on the Services Australia website. Claire also unsuccessfully requested the forms from her local Centrelink Service Centre. Claire advised the couple to visit their local community resource centre, which has a Centrelink Agent, to complete the claim process.

At the local community resource centre, staff set John and Susan up with email and myGov accounts in order to apply for Carer Payment online. John and Susan did not understand the digital systems and weren't comfortable using a computer or online forms. They also weren't able to use and check their email or myGov accounts. Staff at the community resource centre, who are not employed by Centrelink, were unable to help John and Susan make their claim or provide assistance with their social security issues. John and Susan returned home unable to make a claim.

The next time Claire visited John and Susan, they had still not been able to claim Carer Payment and their financial issues had worsened. They discussed driving to the closest staffed Centrelink office, which is in a regional centre more than four hours away. The couple were reluctant to travel due to John's health and the sizable travel costs.

As a final option, Claire advised John and Susan to make a phone call to Centrelink to try to make a claim over the phone. John and Susan drove into town so they could have phone reception to call Centrelink. They waited on hold for two hours, during which time automated messaging repeatedly directed them to sign up for myGov and make the claim online.

The default to digital services extends to the requirement to provide documents such as completed forms, medical evidence and proof of identity. Many women in 4R areas do not have access to printers, scanners or other hardware, yet they are required to upload documents online in order to access and maintain their social security entitlements.

Some of our clients don't have printers. They don't have the ability to scan documents. That's also a difficulty because we are trying to get information from them as quickly as possible.

— Regional New South Wales

Even just providing to Centrelink bank details or bank statements can be really hard, especially in [this region]. We now only have one bank service, and again, a lot of people don't use internet banking, so they go, 'Well, how can I get this bank statement to Centrelink?'

— Very remote Northern Territory

Many women in 4R areas do not have access to printers, scanners or other hardware, yet they are required to upload documents online in order to access and maintain their social security entitlements.

We understand that Services Australia is currently engaging with state governments as well as private and community stakeholders to improve digital platforms and connectivity. While these efforts will improve access for some, they will not eradicate digital exclusion. For example, the 2023 Digital Inclusion Index shows the extent of the digital gap experienced by First Nations people, and the progressively widening digital gap experienced by First Nations people in 4R areas.¹¹ While addressing digital exclusion is a long-term and complex endeavour, there is a clear and ongoing need for Services Australia to provide high-quality face-to-face and phone services.

Recommendation 41: That Services Australia provide accessible alternatives to online services, informed by engagement with a cross-section of intended beneficiaries and which provide genuine choice to customers about how they engage.

Recommendation 42: That Services Australia reintroduce readily accessible paper forms for all administrative processes including claims, requests for review, complaints, compulsory income management exemptions/exits and Centrelink administration.

Recommendation 43: That Services Australia undertake outreach and public education campaigns to actively engage with digitally excluded communities and to ensure they are aware of and can access available social security entitlements and relevant support services including legal assistance, financial counsellors and community organisations.

Lack of digital skills

The rapid shift to online systems assumes a level of digital proficiency that is not universal, leaving many women in 4R areas struggling to access essential services. Even those with digital skills often find navigating myGov and Centrelink online challenging. A recent myGov review revealed that 37 per cent of Australians struggle with online services, and only 44 per cent can find help when needed.

The complexity of the social security system compounds these challenges. Online questions and prompts can be confusing, particularly for those with limited English proficiency. Even native English speakers often struggle to comprehend automated communications, forms, and reporting requirements, leading to incorrect payment decisions.

In 4R areas, women face additional barriers. Some lack the necessary digital skills, while others distrust the safety of online services. The digital divide is further exacerbated by limited access to devices and internet connectivity in 4R locations.

I've had clients where they don't even have an email address and the only option to resolve their matter has been for me to set them up an email and then log them into myGov.

— Regional Victoria

[Our clients] don't have the tech literacy to be able to complete the significant number of questions [Centrelink] were asking ... And a lot of our clients have significantly less literacy

skills than [others] do. And yet they're expected to complete the same forms when a legally trained [person] had struggles completing those forms.

— Rural New South Wales

I feel like sometimes it's just a lack of understanding of what they're eligible for. They can't find information if they're not computer literate. If you know your way around a computer and you can Google, great. But [not] for the people who don't have a computer or don't know how to do that or have a language barrier or any number of reasons.

— New South Wales

In 2021, Services Australia introduced one-on-one ‘digital coaching’ to help people set up and use online services. Digital coaching can include help setting up an email account, opening a myGov account, and setting up the myGov app. It also provides step-by-step assistance for people to learn how to use Centrelink’s online services.

Coaching is by appointment and can be delivered by phone, face-to face in a Centrelink office, or off-site (on some occasions) by Services Australia staff conducting outreach. Since its commencement, face-to-face digital coaching has been the primary mode of coaching, with between 94 per cent and 99 per cent of digital coaching booked and delivered face-to-face each year.

Services Australia data shows that more than 382 000 people had booked and completed a digital coaching session by the end of November 2024.

2021	58,043
2022	133,462
2023	106,866
2024 (to 30 Nov)	83,849

A recent myGov review revealed that 37 per cent of Australians struggle with online services, and only 44 per cent can find help when needed.

Data suggests that the majority of those who have undertaken a digital coaching session since 2021 were women, noting that in at least one in five cases, gender was not recorded.¹²

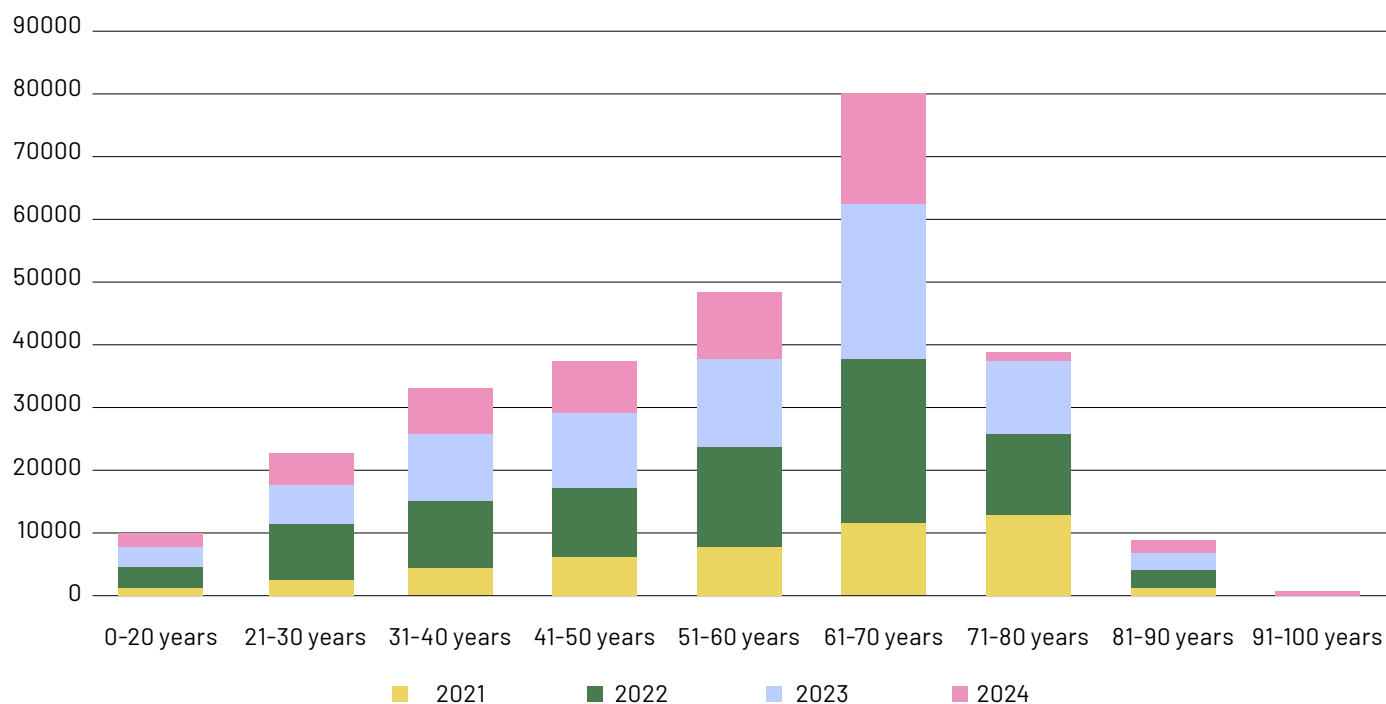
Table 1: Number of people accessing Services Australia’s digital coaching by gender (rounded to nearest ten)

	2021	2022	2023	2024
Female	24,560	53,470	45,027	36,070
Male	21,090	44,330	35,160	28,120
Unstated	12,390	33,670	26,680	19,650

12 From December 2022, Services Australia have implemented a change in Centrelink system to recognise gender other than the sex they were assigned at birth or during infancy, or as a gender which is not exclusively male or female. To protect the privacy of individuals and comply with confidentiality policy, Services Australia groups persons identifying as ‘non-binary’ with ‘females’ in the period following implementation of this change.

There was significantly higher demand for digital coaching from people aged 51 years or older (noting the age of approximately 92,387 people is not known), Demand was highest across all age groups in 2022, although the reason is not known. It may have coincided with Services Australia push to increase digital access, other motivators, or a combination of both.

Chart 1: Number of people accessing Services Australia's digital coaching by age



Other aspects of digital coaching are less well-known, including whether:

- all requests were by individuals or some people agreed to digital coaching because they were not given an option to engage with Services Australia without it.
- it enables people to access digital services effectively, retaining information so they can use digital services whenever necessary
- people found the experience useful, satisfactory, etc.

It is also unclear why more people aren't accessing digital coaching, noting 382,220 is a large number of people but a very small percentage of the enormous number of people who receive Centrelink payments or a health care card (8.5 million in 2023-24¹³), and service providers regularly encounter people whose social security problems stem from their lack of digital capacity.

My elderly clients, who have limited English literacy and no IT skills, had their Age Pension cut off as the result of their failure to respond to letters sent to their myGov account. They were off payment for a long time. This expectation of engaging with myGov is an issue for many elderly clients from CALD backgrounds.

— Regional New South Wales



Digital coaching was not referenced during EJA's fieldwork with service providers, and service providers were not specifically asked about their knowledge and experience of it, so its availability and effectiveness are not referenced in this report. Given it was not referenced, during significant commentary on digital access, it seems likely many service providers and individual people are unaware it is available. EJA seeks stronger promotion of the availability of digital coaching, more nuanced evaluation of its process and outcomes.

While Services Australia is responsible for assisting people to gain digital access to their social security entitlements, digital access remains a barrier for many. It is vital that Services Australia continue to resource frontline face-to-face services for people experiencing barriers to online services.

Recommendation 44: That Services Australia increase promotion, provision and nuanced evaluation of digital coaching, including recognising where elements of digital engagement are beyond the customer who should be referred into non-digital support.

Recommendation 45: That Services Australia redesign online interfaces using principles of universal design, ensuring they are intuitive and accessible for users with varying levels of digital and language proficiency.

Recommendation 46: That the Federal Government ensure all Commonwealth-funded strategies to improve digital access include consideration of the critical role of digital servicing in facilitating social security entitlements and support.

Recommendation 47: That the Federal Government ensure all Commonwealth-funded digital mentorship initiatives are community-led.

Lack of affordability

Social security payments are low, and poverty and remoteness exacerbate the digital divide.

Someone's ability to afford a phone plan, internet plan or pay-as-you go data will affect their online access. The cost of digital access competes with other essential expenses such as rent, food and transportation. However, digital access drastically affects a person's ability to claim their social security entitlement and maintain reporting requirements. This can cause great distress as people genuinely seek to maintain their social security income and pay for essentials.

According to the 2023 Digital Inclusion Index, it is more expensive to access online services for people in 4R areas, and is most expensive for people in very remote areas. People in very remote areas are also more likely to have mobile-only internet access, which reduces affordability as mobile data is often significantly more expensive per gigabyte than fixed broadband. This disadvantage is further compounded by people on lower incomes being more likely to rely on (more expensive) pre-paid services to connect to the internet.

The lack of affordability of digital services is particularly pronounced in remote First Nations communities where the vast majority of people are mobile-only users. In these communities, more than half (51.1 per cent) of people surveyed for the 2023 Digital Inclusion Index 'sometimes', 'often' or 'always' sacrifice essentials (such as food or bills) to afford internet costs. In the Northern Territory, the digital affordability score is trending downward.

People don't have enough money to be paying for rent, inflated food prices, transportation and a digital device with a data plan that is sufficient to always be able to be connected to the sites [like myGov and Centrelink online] to manage their money that way.

— New South Wales

This is what gets me about these systems - people are continually disadvantaged as a result of poverty. You're almost a hostage to a rural property. There's very little that you can do to get out of that situation.

— Rural Western Australia

The cost of digital access competes with other essential expenses such as rent, food and transportation.

70 per cent of the Northern Territory does not have phone network coverage at all ... There [are] so many outstations that have got no connection whatsoever unless they can afford to pay \$200 a month to get Starlink set up and a lot of those don't have access to that either.

— Remote Northern Territory

Some women on low incomes cannot afford to own devices while others resort to sharing devices or using public facilities, which can compromise privacy and convenience.

People share phones around - whoever's phone had enough data on it on the day to do whatever it was that had to be done.

— New South Wales

We hear [about] family members using shared devices a lot.

— Remote Northern Territory

While the social security Telephone Allowance can be paid to people on a few select payments, the current rate of \$2.70/week (paid as \$35.60/quarter) does not meet the cost of even the cheapest mobile phone or internet service plan in metropolitan Australia, let alone account for increased cost of living in 4R areas.

Further, the Remote Area Allowance, a regular payment available if a person lives in a remote area and receives an income support payment, is currently only \$9.10/week (for a single person, paid as \$18.20/fortnight). This was last increased almost 25 years ago and is not indexed despite the estimated cost of living in remote areas being on average almost 40 per cent higher than costs in metropolitan areas.¹⁴

Recommendation 48: That the Federal Government establish a Digital Allowance to address the cost of online connectivity for people on low income, with this Allowance indexed to keep pace with technology and service cost increases.

Recommendation 49: That the Department of Social Services immediately increase and index the Remote Area Allowance.

Recommendation 50: That the Federal Government review remote area costs to develop a benchmark for the Remote Area Allowance and adjust the payment accordingly.

Functionality issues with myGov, Centrelink online and digital services

Services Australia's streamlining of information and processes has misfired, delivering a host of challenges for many attempting to engage with its online systems. These online systems are complex and include functionality issues.

One of the primary issues is the complexity and confusing nature of the online interfaces. Many service providers have difficulty navigating Centrelink online to find basic information or perform simple tasks; the circular nature of some online pathways leave many frustrated and unable to access the services they need.

When you go onto the website, and you just maybe want the contact number for say aged people, and it just goes round. It goes round. You just want [to find a] form and it just keeps going. You seem to be going in circles ... I don't know - why can't you just click on a page and there's the list of all the phone numbers?

— Regional Tasmania

I guess [Services Australia] kind of forces you to be a bit tech savvy and those kinds of things - because either that or [clients] don't get paid.

— Rural Queensland

This automation thing ... as much as governments say that that is all about efficiency, it's not efficient for the person who's the end user of the system often.

— New South Wales

The implementation of multi-factor authentication, while important for security, has created additional hurdles. This is particularly problematic for individuals who frequently change phones or have limited access to digital devices.

myGov, with how it's probably developed in the last few years, and needing multifactor identification and emails and stuff, can be really challenging for people.

— Very remote Northern Territory

Getting logged into [myGov] with all the linking codes is the first hard step, so that's when you call Centrelink for help. So, there's half a day if you can get it sorted and then when you do [get into myGov], I'm no good at it. So, I don't know how people with less education are supposed to do everything online. It's not very user-friendly.

— Rural Victoria

While digitisation has assisted document collection and storage in many ways, it is not reliable and has undermined trust in the system. Service providers reported frequent issues with documents being lost or misplaced by Services Australia, in turn leading to delays and frustration.

What's the go with [Services Australia's] records management system anyway internally? When we put a document in, what happens to it? They lose documents.

— Australian Capital Territory

There's something really bizarre that is happening [with Centrelink online] ... when documents are uploaded. It doesn't alert the system that they're there. So then manually things might be sitting there and it hasn't triggered something on the client's file. And we have to call up to get it processed.

— Australian Capital Territory

Recommendation 51: That Services Australia undertake detailed mapping and analysis to establish where people have not been able to engage digitally and develop strategies through co-design with stakeholders to ensure their right to social security.

Recommendation 52: That Services Australia implement a more flexible multi-factor authentication system that accommodates users who change phones frequently or have limited access to digital devices.

Recommendation 53: That Services Australia improve the document management system to ensure uploaded documents are immediately flagged and processed, with automatic notifications sent to both Services Australia and the customer.

Recommendation 54: That Services Australia implement a system for customers to track the status of their submitted documents and claims in real time.

Identity verification issues

For most people, the first step in the social security payment claim process entails setting up a MyGov account. The second step is to obtain and upload proof of identity documents. This combination of steps can be enough to lock people out of making a claim.

The primary issues relating to the intersection of identity and digital services include challenges in dealing with myGov, passwords and multi-factor authentication. While these processes are necessary to safeguard people's personal information, the flipside is that they regularly exclude people from accessing online services. myGov and Centrelink online do not have accessible or prompt processes for dealing with issues such as lost access to accounts and emails, and general troubleshooting.

I had my phone stolen [overseas]... and they had tried to steal my identity. So I locked everything down, which meant that I couldn't then at that point get into my Google account, which is my email and Google Drive and all of that. And so I couldn't get into the myGov ID.

— Regional Tasmania

If they've fled [domestic violence] they might not have any passwords or have ID ... [Even then] the customer service attendant will say, 'yep, try this online or try that or call this number'. But from there, it's a really long process and I think, older people in particular, [if] they didn't have someone like us around to help them, they would probably end up giving up.

— Regional New South Wales

Service providers reported frequent issues with documents being lost or misplaced by Services Australia, in turn leading to delays and frustration.

The significant issues relating to proof of identity requirements, and associated recommendations, form the basis of Chapter 4:: Proof of Identity Requirements.

Privacy and security concerns and technology-facilitated abuse

While intended to improve accessibility, Services Australia's increasingly digitised systems have inadvertently created new avenues for privacy breaches and technology-facilitated abuse. These issues disproportionately affect vulnerable populations, and particularly women experiencing domestic violence and women in smaller communities.

In some cases, the very systems designed to provide support can become tools of control and abuse in the hands of malicious actors. Perpetrators may gain access to their partner's myGov accounts, monitor their activities and potentially sabotage attempts to seek help or leave dangerous situations. This digital intrusion can pose significant safety risks to victims of domestic violence.

Privacy issues can be compounded in 4R areas, where privacy is already at a premium. Abuse of myGov can inadvertently expose individuals' personal information to their community, potentially compromising their safety and autonomy.

Sometimes safety is an issue [with myGov]. Obviously if women are still on and off with a partner or if he's got access to her myGov and she's applying for a payment, we don't want him to be able to see that in case it's part of her plan to leave.

— Regional New South Wales

Women have [the] ability to manage the money but they're not allowed to ... even though it is her money but she's under control of someone else. That happens a lot [with the husband] having access to myGov and the ATM card. And then the woman cannot pay all the bills and then the man has already spent all the money.

— Rural Queensland

He had full control over her myGov and her email.

— Rural Queensland

Technology-facilitated abuse in the context of Services Australia online systems is alarmingly prevalent. A particularly insidious practice involves abusers exploiting access to family members' or partners' myGov accounts to take out advance payments (colloquially known as 'Centrelink loans') in their name and without their consent. This form of financial abuse not only saddles women with debt but also establishes further financial barriers to leaving abusive relationships. The ease with which accounts can be accessed and manipulated in this way highlights a critical vulnerability in the system. This digital form of coercive control extends the reach of abusers, making it increasingly difficult for victims to seek help or plan their escape without detection.

And we see a lot of people's Centrelink loans being taken out in people's names using myGov. It happens a lot, the financial abuse, it is a huge problem, and the tech-facilitated abuse, and Centrelink seems oblivious to it.

— Remote Northern Territory

Sometimes their myGov is locked out because of the technology abuse. It's a huge issue as well, and it's not safe for them to use technology.

— Rural Victoria

Recommendation 55: That Services Australia develop a 'secure mode' for myGov accounts that hides sensitive information and activities from the account overview, designed for users at risk of technology-facilitated abuse.

Recommendation 56: That Services Australia improve their response and handling of cases where technology-facilitated abuse is suspected, with the power to quickly secure and recover compromised accounts.

Recommendation 57: That Services Australia develop and implement a public awareness campaign about the risks of sharing account credentials and the importance of maintaining personal control over government service accounts.

Recommendation 58: That Services Australia collaborate with legal, domestic violence and financial counselling organisations to create and distribute educational materials on digital safety and privacy for Centrelink recipients.

Technology-facilitated abuse in the context of Services Australia online systems is alarmingly prevalent.

Phone systems

Excessive telephone wait times and dropouts

Women, and the organisations supporting them, report enormous frustration at the lengthy phone wait times experienced when attempting to contact Services Australia. Many people spend hours on hold, often without resolution. Problems with phone access can then result in incomplete claims, and in some cases, complete abandonment of the process. The problem is particularly acute for those in 4R areas, where limited transportation options, lack of face-to-face services and inconsistent phone reception compound the challenges of accessing phone services.

We've got a client that - they don't drive, they don't have a car. And the public [transport] system here is awful. And so, she sits on the phone for three hours before she gets - that's all. They give up and don't give an answer. That's an issue. The actual wait time while you're waiting for Centrelink to answer for a long time.

— Rural Queensland

I spend forever on hold to try and to get through to someone.

— Rural Queensland

Pretty much everyone I speak to is frustrated and overwhelmed and just can't get any clear answers; can't talk to anyone at Centrelink. They just can't get through oftentimes, on hold

for ages, and the call's disconnected. And when they do speak with someone, it's kind of the luck of the draw in terms of if you're going to get someone who's going to give you a clear answer about what you need to do to get back on payment, or why your claim was rejected.

— Australian Capital Territory

I've previously been on the phone with Centrelink for four hours and 47 minutes.

— Rural Victoria

The system's one of those where at the end of the hour you drop out and you've got to call again.

— Rural Queensland

Calls with Services Australia can drop out without clear explanation, and Services Australia's unexplained blocking of incoming calls from the same number causes great frustration. It can also prevent support and advocacy services being able to make calls about more than one client in a day.

If you ring from the same phone ... even if it's for two different clients and you ring from the same phone, [Centrelink] just hang up on you.

— Rural Queensland

If you've actually rung once and you've had to run off and do something, and put the phone down, it recognises that's your phone number and won't let you actually get through again that day.

— Regional Tasmania

The fragmented nature of Services Australia phone systems adds to this frustration. Women often find themselves navigating multiple phone lines, needing to make telephone contact through separate systems for myGov issues, different payments, Workforce Australia issues,

Smart Card questions, income reporting and other demarcated issues, creating a labyrinthine experience they find overwhelming and time-consuming.

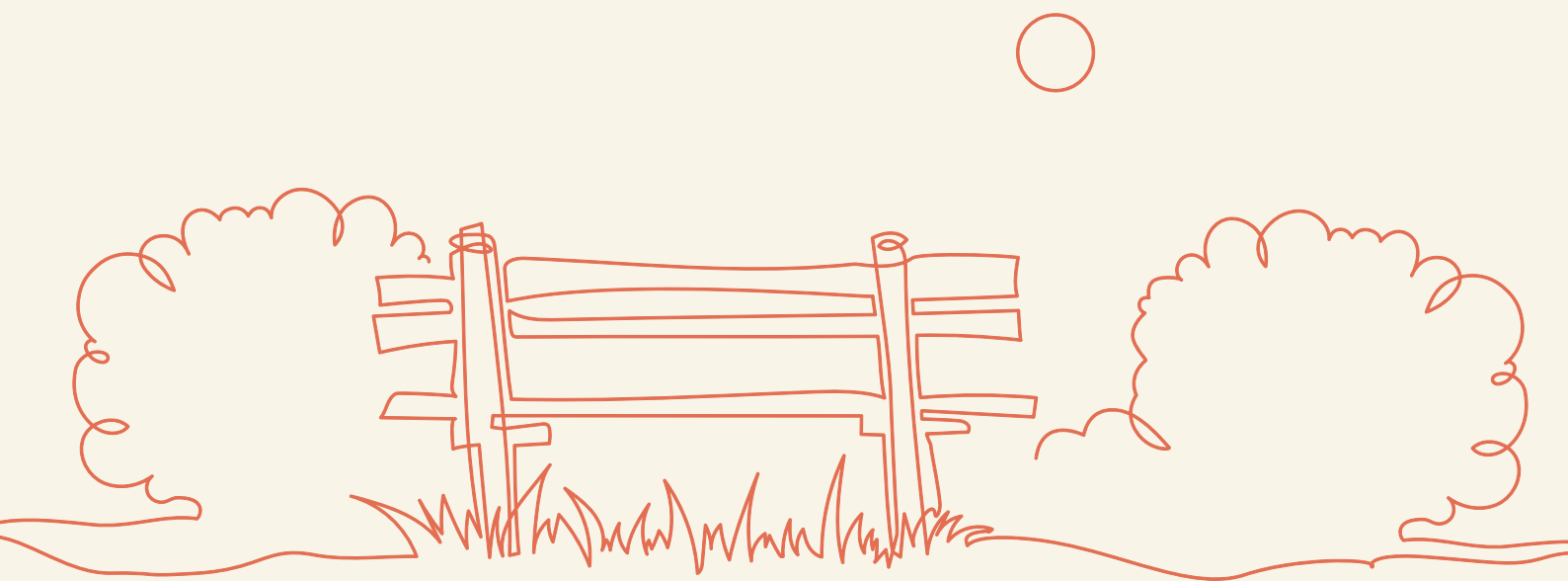
It's now three separate apps for this one claim. And each of them has a different phone line. Centrelink doesn't do myGov ID problems, you have to call the myGov ID line. And then you have to call the Centrelink line. And then you have to call the Workforce line.

— Regional Tasmania

The callback system, while intended to alleviate long wait times, presents its own set of challenges. For those in 4R areas with unreliable phone reception, missed callbacks can mean starting the entire process over again.

The issue with the callback, particularly for a number of our regional clients, is often when they call back, they're not in phone reception range or have other stuff on. And then [Services Australia] try once. That's it. And then they've got to go start the whole process again.

— Rural Western Australia



Women, and the organisations supporting them, report frustration that outgoing calls do not identify the caller as being from Services Australia. People experiencing family violence often refuse or are reluctant to answer phone calls from private or blocked numbers due to a real or perceived risk that the perpetrator or related person is trying to contact and locate them. It is near impossible to verify the identity of a caller using a private number even after the call. The usual solution, to return the call, is unavailable as numbers are blocked, so people can be unaware that Services Australia has been trying to contact them.

Women experiencing family and domestic violence report frustration that:

- if the phone call is missed, and the person then attempts to engage with Services Australia through normal phone channels, they will face an extended wait time, which may result in missing an appointment
- many other agencies and abusers use private numbers. If waiting for a pre-booked appointment or callback, it is impossible to screen calls to ensure this call is from Services Australia and be available for the call.
- perpetrators may be monitoring devices and technology, and a victim-survivor may not be able to come up with a convincing cover story about why they are receiving a call from a private number.

Recommendation 59: That Services Australia significantly increase staffing for phone support services to reduce wait times, with a target maximum wait time of 15 minutes.

Recommendation 60: That Services Australia create a priority queue system for callers from identified remote or low-connectivity areas to ensure they can access services effectively during periods of reception.

Recommendation 61: That Services Australia implement a more flexible callback system that allows callbacks to be scheduled at specific times when they know they will be available and in areas with reliable reception.

Recommendation 62: That Services Australia provide customers a choice about whether calls are received as a 'private number' or 'Services Australia', instead of automatically blocked numbers listed as 'private number'.

Recommendation 63: That Services Australia ensure that, when requested by a customer, all confirmation text messages regarding pre-booked appointments and callbacks are received in advance of the scheduled time.



Perpetrators may be monitoring devices and technology, and a victim-survivor may not be able to come up with a convincing cover story about why they are receiving a call from a private number.

Language and communication barriers

While intended to be universally accessible, Services Australia's phone systems present significant challenges for particular demographic groups of women in 4R areas, as access is affected by language, cultural differences and varying degrees of digital literacy. Key affected groups include:

- women for whom English is not their first language
- migrant women
- transgender women
- older women
- First Nations women
- women with disabilities.

Transgender women face unique challenges accessing Services Australia's phone systems, with staff responding with suspicion when they hear the sound of their voice.

For non-native English speakers and First Nations women, Services Australia's automated systems pose particular difficulties. For example, the voice recognition ('voiceprint') technology cannot always recognise English spoken with a 'non-standard' Australian accent or with other linguistic variations.

We have women in remote locations who speak Aboriginal languages 90 per cent of the time and English 10 per cent of the time ... We see [the voiceprint] as a double up of communication issues.

— Very remote Northern Territory

Transgender women face unique challenges accessing Services Australia's phone systems, with staff responding with suspicion when they hear the sound of their voice. That can prove distressing and can prevent access.

It is very unique for trans women. [They go], 'Hi, my name is Susie and I sound like Ted, the road train truck driving man'. [Centrelink go] 'You can't be, your voice doesn't match the

assumption for a woman on phone calls' ... and the person on the other end would go, 'No, you're not [a] female'.

— Rural New South Wales

For many in 4R or culturally diverse communities, the complexity of the language used in Centrelink communications online and over the phone creates significant barriers as they cannot understand what is being asked and what information is required.

Not a lot of people out here are really fully educated, not a lot you know. Like when we can't help them here or [the Centrelink Agent] can't help them, we put them on the phone and Centrelink uses these big words. They use a lot of big words and things that they're not going to understand and half the time they got them agreeing to things that they don't even know about.

— Very remote Queensland

Recommendation 64: That Services Australia conduct regular consultations with diverse community groups to enable ongoing identification of phone service barriers, and develop strategies to address them.

Challenges for support services and advocates

Community-based organisations and advocates play a crucial role in supporting women in 4R areas, particularly those experiencing domestic violence and financial hardship. Unfortunately, community workers report significant challenges in their efforts to assist clients with social security matters, as lack of access to efficient communication channels with Services Australia undermines service provision and causes great frustration to both workers and clients.

Advocates report spending lengthy periods on hold, often without the resolution of critical issues for their clients.

Sometimes it's not possible to stay on hold [with Centrelink] because you've got other appointments, meetings and stuff ... So many of the numbers that you call, you just get a robot ... and then even if you do get through to a person, they tell you that the wait time is 90 minutes or 120 minutes or something insane. So, you're spending half your day.

— Rural Victoria

The loss of direct communication channels with local Services Australia offices has been particularly detrimental. Many organisations report that previously established relationships, which allowed for more direct communication and problem-solving, have disintegrated.

We could phone or email [our local Centrelink office] directly with questions. They were really good about getting Crisis Payments through. They were just a real ally in that space ... We can't even contact them now. There is no direct phone or email for them ... Now we have to go through the main Centrelink way and it just takes so much longer. It just feels like there's no one that we can reach out to or have as a point of contact.

— Regional New South Wales

The lack of timely communication with Services Australia can have serious consequences for vulnerable women. Issues that could potentially be resolved quickly can drag on for weeks, at times exacerbating the client's vulnerability.

Our clients see us as sort of keys to accessing [the social security] system and often it's like, 'I'm sorry we're all in the same boat. We are just going to have to wait for a really, really long time.'

— Rural Victoria

Frequently, advocates have resorted to contacting local members of Parliament to resolve issues – a strategy that should not be necessary.

If I've had people who've been cut off payments and I've really tried everything and stuff, I have gone through their local member of Parliament [and] that has had better resolution faster and I don't think that should be the solution.

— Rural Victoria

The need for a direct communication channel between community workers and Services Australia is clear. Such a system would benefit both clients and Services Australia, as community workers have often put significant time into establishing relationships with clients and can effectively triage information and manage complex cases.

If only we had that point of contact for our clients who are at highest risk or in crisis. Ideally, that contact would be local so they understand the context.

— Regional Queensland



EJA has been fortunate to be part of the Services Australia Advocates Line pilot, which has proven highly successful. The Advocates Line allows EJA member centre caseworkers to contact Services Australia via email to establish facts and seek assistance regarding cases where otherwise standard processes have failed and there is some urgency in seeking a resolution. This model has relied in part on the social security legal specialisation of members, but certainly demonstrates the efficiency of an effective line of communication between client advocates and Services Australia. EJA members have seen many significant positive outcomes for clients following access to their social security entitlements.

While the Advocates Channel may not be replicable across all community services, EJA seeks development of a scalable and appropriate model to support timely engagement between community workers who support victim-survivors and Services Australia.

Frequently, advocates have resorted to contacting local members of Parliament to resolve issues – a strategy that should not be necessary.

Recommendation 65: That Services Australia develop a mechanism for community workers to engage directly with Services Australia in a timely way to better support their mutual clients.

Recommendation 66: That Services Australia re-establish and strengthen relationships between local Services Australia offices and community-based organisations, facilitating more efficient, context-aware problem-solving.

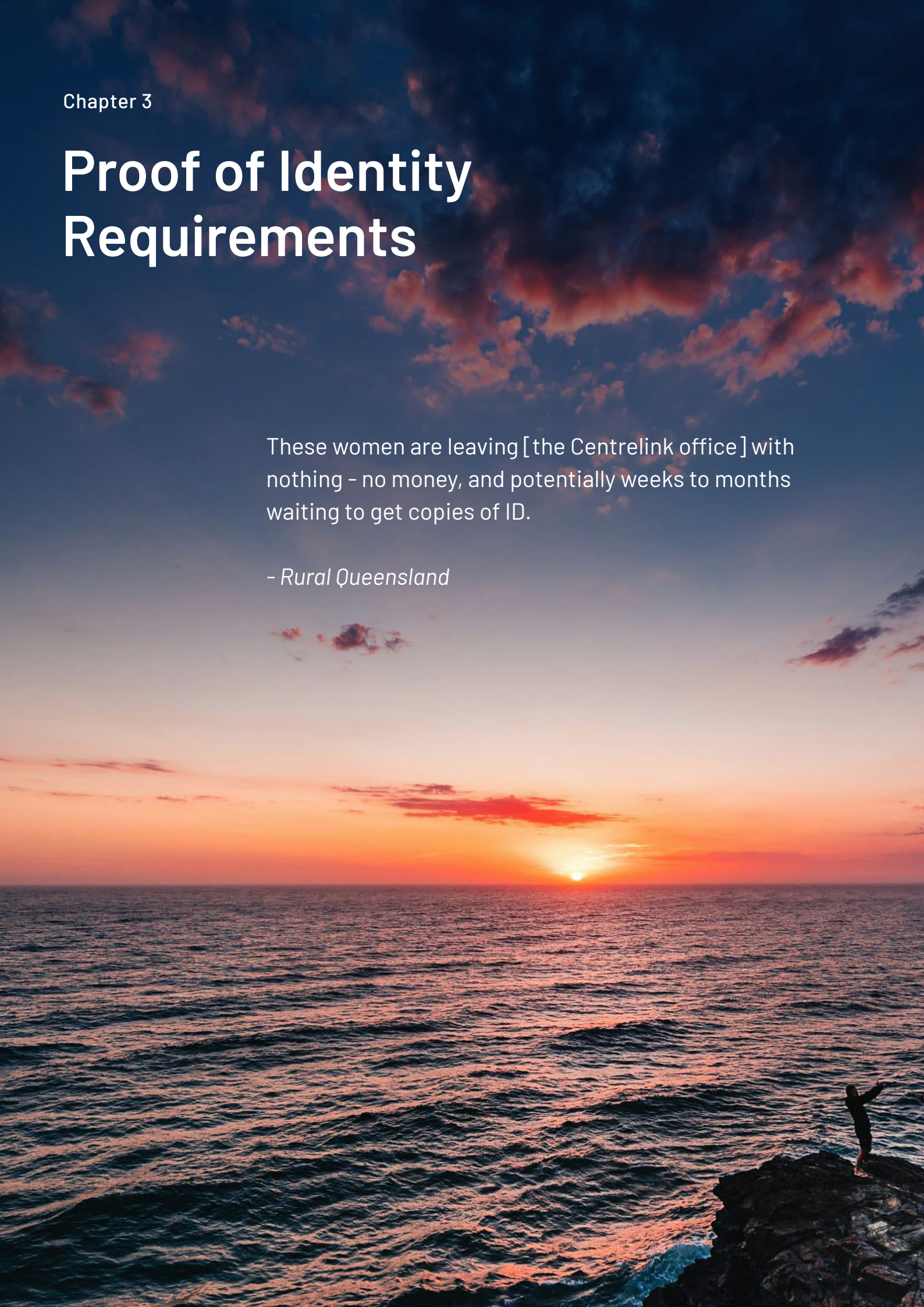
Recommendation 67: That Services Australia review membership of the Civil Society Advisory Group to ensure inclusion of key community organisations, with a view to addressing systemic issues and improving communication channels.



Proof of Identity Requirements

These women are leaving [the Centrelink office] with nothing - no money, and potentially weeks to months waiting to get copies of ID.

- Rural Queensland



Key findings

22. Proof of identity (POI) requirements are designed to ensure payments are made to the correct person, secure individuals' personal information, and protect the integrity of the social security system. However, these requirements at times delay or prevent vulnerable women accessing essential social security entitlements.
23. While alternative POI processes exist, they are not made available or consistently implemented by frontline staff where required. This is a particularly significant issue for women in regional, rural, remote and very remote (4R) Australia.
24. Critical information about alternative POI processes is not publicly available, which limits service providers' capacity to support vulnerable women to claim their social security entitlements.
25. Some First Nations women face particular barriers to social security as a result of POI requirements, including issues linked to birth registration and name variations on official documents.
26. For victim-survivors of family and domestic violence, POI requirements can be a significant barrier to leaving an abusive relationship and can slow or prevent payment at the point of leaving when financial support is critical.
27. Young women, migrants, refugees, and women leaving institutions (for example, prisons and psychiatric facilities) face unique and sometimes insurmountable challenges meeting POI requirements.
28. Services Australia's POI systems require review to ensure vulnerable women are able to claim their social security entitlements.

Current proof of identity rules and processes

Proof of identity (POI) requirements are a fraud prevention measure designed to ensure payments are made to the correct person, secure individuals' personal information, and protect the integrity of the social security system.

The requirement for identity confirmation and verification is derived from section 8 of the *Social Security (Administration) Act 1999* (Cth), which states that abuses of the social security system are to be minimised. In line with this objective, Services Australia aims to achieve a high level of confidence that people are who they say they are, drawing on the [National Identity Proofing Guidelines](#) and *Guides to Social Policy Law*.

The Document Verification Service – a joint Australian, state and territory government initiative that is maintained by the Attorney-General's office – is used to verify the accuracy of details in key identity documents and to establish which documents are verifiable. To that end, people are required to prove their identity when making a claim for a social security entitlement or service for the first time. They are also required to participate in authentication processes when accessing their customer account or interacting with Services Australia.

Standard POI options

People have two standard POI options:

1. To present original POI documents to Services Australia, which the Agency then verifies with the issuing authority through the Document Verification Service. Services Australia also undertakes a facial comparison with a photo identity document.
2. To use digital identity generated by an accredited identity provider under the Trusted Digital Identity Framework. In the social security context, only digital identities created through the myGovID app are currently accepted by Services Australia.

In August 2024, the [Minister for Government Services Bill Shorten announced](#) that a new identity verification technology, Trust Exchange (TEx), was being developed. TEx has been explained as an initiative which allows people to tap their smartphone to a QR code to verify their identity. As of November 2024, it is in the 'proof of concept' stage.

People using the first standard process are required to provide Services Australia with three approved identity documents and to complete an in-person facial recognition check. These documents must include one document from each of the following categories, with one being photo ID:

- **'Commencement of Identity' document.** For example, a birth certificate, ImmiCard or passport.
- **'Primary Use in Community' document.** For example, a driver's licence or marriage certificate.
- **'Secondary Use in Community' document.** For example, a bank card, tenancy agreement or utility account.



Each document must show the same name and identifying details, or Services Australia requires:

- a linkage document, such as a marriage certificate
- a proof of change of name from an Australian Births, Deaths and Marriages Registry
- a verifiable document from the Department of Home affairs regarding name change for people born or whose name changed overseas.

The *Guide to Social Policy Law* (Social Security Guide) states the onus for establishing and confirming POI is always on the person claiming a social security entitlement.¹⁵ The *Social Security Guide* also recognises that some people may be unable to provide identity documentation, including people experiencing domestic violence, victims of a natural disaster, recently released prisoners, people whose birth is not registered and people experiencing homelessness.¹⁶ However, there is no automatic exemption from providing POI documents for people meeting these criteria, except for people affected by natural disasters.¹⁷

Services Australia maintains that staff will never ask a customer to buy identity documents if they are genuinely unable to confirm their identity, noting Services Australia can verify a person's birth in Australia, use the Aboriginal Population Record as an identity document, or obtain assistance from a Nominee, Power of Attorney or State Trustee to assist people to establish their identity.

Alternative POI options

People who cannot meet standard POI requirements can complete an Alternative Identity assessment. These can enable access to a social security payment, but a new POI process must be undertaken if the person claims a new payment, for example, at the point a person becomes ineligible for JobSeeker Payment due to age and submits a claim for Age Pension.

Alternative POI arrangements fall into two broad categories: Reviewable Alternative Identity and Non-Reviewable Alternative Identity.

Reviewable Alternative Identity generally applies when Services Australia determines a customer will be able to provide standard POI but needs more time to gather those documents. This process can be enacted if Services Australia has only 'minor reservations' about a person's identity, allowing payment for two pay periods (28 days) while remaining POI documents are provided.

15 Australian Government Guides to Social Policy Law. [Social Security Guide 'General procedures for confirming & verifying identity' 2.2.1.10](#)

16 Australian Government Guides to Social Policy Law. [Social Security Guide 'Persons experiencing difficulty with identity confirmation & verification' 2.2.1.40](#)

17 Australian Government Guides to Social Policy Law. [Social Security Guide 'General procedures for confirming & verifying identity' 2.2.1.10](#)

The *Social Security Guide* states that the system will automatically cancel payments if the person cannot satisfy POI criteria after 28 days,¹⁸ although EJA understands automated cancellation was disabled in 2000. EJA is also aware that in some instances the 28-day period can be extended, although information on such extensions is not publicly available. Community workers continue to see clients whose payments have been stopped when they have been unable to secure POI within the 28-day period.

Aboriginal and Torres Strait Islander people who are unable to provide standard POI have a specific process available to establish Reviewable Alternative Identity: through use of a 'Confirmation of Identity - Verification for Aboriginal and Torres Strait Islander People' form (RA010 form) signed by an 'authorised referee' who can verify the person's identity. An authorised referee includes a Chairperson, Secretary or CEO of an incorporated Indigenous organisation (including land councils, community councils or housing organisations), Community Development Program provider, school principal or counsellor, minister of religion, doctor or Aboriginal medical service manager, Services Australia staff, or a government employee of at least five years.

The *Social Security Guide* states use of an RA010 form requires the person maintain ongoing efforts to establish a confirmed identity by standard processes, although EJA is aware that Services Australia can provide some flexibility, including to grant an extended period to return a completed RA010 form in some circumstances.

Non-Reviewable Alternative Identity can be applied where a customer does not have any or enough required identity documents and is experiencing vulnerability. This process allows a person to receive payments without the need to provide further identity documents, even at a later date. This process can apply to people in circumstances including:

- those who entered Australia post-World War II without verifiable immigration documents
- profoundly disabled customers who cannot confirm their identity due to their disability
- incapacitated nursing home customers who are without identity documents and can't complete a facial comparison
- young people estranged from family with a genuine reason why they can never provide the required identity documents.



18 Australian Government Guides to Social Policy Law. [Social Security Guide 'General procedures for confirming & verifying identity' 2.2.1.10](#)

What is working well?

Alternative POI processes recognise not everyone has POI

Services Australia has developed alternative identity processes for women who struggle to meet standard POI requirements; a positive step towards a more inclusive social security system. These provisions are widely used, with approximately 490,000 people currently accessing social security payments through Alternative Identity mechanisms. Unfortunately, these processes are not always known by community workers or made available to individuals struggling to provide POI.

The RA010 form is a useful alternative to standard POI for some First Nations women

When made available to First Nations women, the RA010 form provides an accessible alternative to standard POI. Where First Nations women without standard POI are aware of and assisted to lodge an RA010 form, it significantly improves access to social security entitlements.

The Community Partnership Project early-stage identity document trial shows promise

Services Australia has initiated an early-stage trial aimed at assisting vulnerable people to secure POI documents at a Community Partnership Project site in Victoria. This trial demonstrates Services Australia's awareness of and commitment to addressing POI challenges. EJA remains hopeful it will deliver positive results, with the model to be expanded to assist women in 4R areas.

Streamlined post-natural disaster POI processes facilitate access

Services Australia takes a flexible and adaptive approach to POI requirements following a natural disaster. The *Social Security Guide* outlines that normal pre-grant identity confirmation processes do not apply to approval for Emergency Payments made to victims of major or widespread disasters. It also provides for timely payment of social security entitlements without satisfying standard POI requirements (although POI is to be confirmed soon after). This practice demonstrates an understanding of the unique circumstances disaster victims face, balancing the need for system integrity with the imperative to provide immediate assistance.

During interviews, service providers in 4R Australia report that streamlined post-disaster POI processes have been effectively implemented in response to recent flooding events in regional Victoria and northern New South Wales.

There is no automatic exemption from providing POI documents for people meeting these criteria, except for people affected by natural disasters.

What needs to change?

At a policy level, Services Australia maintains that a lack of POI documentation should never prevent a person accessing their social security entitlements. Services Australia has numerous powers to assist with identification where a person is unable to satisfy standard POI requirements, including capacity to request information from relevant state and territory Births, Deaths and Marriages Registries.¹⁹

On the ground, some women find POI requirements unduly onerous or impossible to meet. The scale of the problem is not known, as Services Australia does not collect data on the issue,²⁰ noting it would be difficult to develop a method to collect quantifiable data on claims not lodged. It is known, however, that some women struggle to satisfy POI requirements and are pushed into severe hardship as they are locked out of their social security entitlements.

Many community service providers are either unaware that alternative POI processes exist, or they have had significant trouble understanding them and assisting their clients to satisfy them. EJA member centres' specialist social security solicitors similarly experience issues assisting their clients to access standard and alternative identity processes. They report that alternative processes are not routinely followed by frontline staff, and detailed information about alternative processes contained in Services Australia's Operational Blueprint are not available to them. This information is generally kept out of the public domain to minimise fraudulent action.

POI requirements are locking women out of the social security system

A birth certificate is typically included in POI requirements to access a social security entitlement. While birth registration is free across Australia, obtaining a birth certificate is not. Costs vary from \$50 to \$70 throughout the country. Although fee waivers are offered by some Registries, community awareness of these options is low, and the application process for waivers can be complex.

UNICEF Australia's recent research reveals an average of 12,600 unregistered births each year, although the annual figure has decreased considerably since the 1990s.²¹ Not only are these births unregistered, those people whose births are unregistered cannot access a birth certificate. According to UNICEF Australia, specific cohorts are over-represented, most notably:

- people born in remote areas
- people born in disadvantaged areas
- First Nations people
- children born to mothers under 25 years of age.

19 Information provided to the Senate Community Affairs Legislation Committee by Services Australia in June 2024 (QON SA SQ24-000169)

20 Information provided to the Senate Community Affairs Legislation Committee by Services Australia in June 2024 (QON SA SQ24-000169)

21 [UNICEF \(2024\) Certify Hope - Rights from the Start](#)

Birth certificates are usually needed to access to social security, as well as to obtain secondary POI including drivers' licences, passports, photo identity cards, bank accounts, tenancy agreements, utility accounts and more. Consequently, people who lack birth certificates regularly lack alternative forms of ID and struggle to access necessities.

It is Service Australia's policy that customers should not be required to purchase documents. Services Australia staff may request birth certificate information from relevant state and territory Births, Deaths and Marriages Registries, but many women are unaware and are not being offered this option. It is essential that frontline staff are better supported and trained to use this mechanism.

EJA research uncovered many cases of women locked out of social security entitlements and trapped in poverty due to their inability to satisfy Services Australia's POI requirements. Women were turned away and told to submit documents they didn't have, and which were difficult or impossible to obtain. The suite of alternative arrangements available under social security policy and law are not always made available to women in 4R areas.

*They don't have ID. They go to Centrelink.
They're just turned away.*

— Regional Queensland

*Deciphering the system of ID takes ... months.
To go to Births, Deaths and Marriages and
stuff like that. And then that whole time, that
person doesn't have any payments and/or
community services ... and family are forced to
support them when they're already in poverty
themselves.*

— Statewide South Australia

*People don't have identification. They're
persona non grata. They don't exist. They don't
exist to [the social security system].*

— Rural Queensland

*Quite a number, they don't have a birth
certificate. And how do you get online to order
one? And where do you get it sent to? And do you
have the money that you need in the first place
to get one? And do you have a fixed address for
it to be sent to?*

— Rural Queensland

*Finding ID is so hard ... Even just providing to
Centrelink bank details or bank statements
- that can be really hard, especially in [this
region]. I think it's just seen as 'Well, you're the
keepers of the money. I have to prove that I'm
worthy of that money. And I have to provide
various forms of ID.' Just even finding forms of
ID is such a difficult process, especially here in
[this region].*

— Very remote Northern Territory

The reality for women in 4R areas is that current POI requirements can be a significant barrier to social security access. The inflexibility and unduly onerous nature of 'standard' POI requirements fails to take account of the diverse realities of people's lives.

Currently, Services Australia does not have an accurate picture of the extent of this issue, as the Agency does not collect data on the number of claims rejected or pending provision of POI documents based on insufficient POI.²² More work is needed to develop effective mechanisms to capture this data, including formal claim rejections, claim delays, and people being turned away or dissuaded from submitting a claim.

Recommendation 68: That Services Australia improve training and support for frontline staff to identify people struggling with proof of identity requirements, encouraging them to apply to Reviewable and Non-Reviewable Alternative Identity Processes, and to seek documents held by other government departments, where appropriate.

Recommendation 69: That Services Australia and DSS amend the *Social Security Guide* to extend the Identity Review Period from two pay periods (28 days) to mirror disaster-related identity provisions (eight weeks with possible extension of up to eight weeks).

Recommendation 70: That Department of Social Services amend the *Social Security Guide*, mirroring disaster-related provisions, to reflect the diversity of circumstances that undermine people's capacity to establish POI, including escaping family and domestic violence, homelessness, certain medical conditions, living in remote communities, being recently released from incarceration, having an unregistered birth, and other personal crises.

Alternative identity processes are not consistently applied by frontline staff

Service providers report many women in their communities had been turned away from physical Services Australia service locations because they did not have sufficient POI. When asked about their experiences, most non-legal service providers did not know that Services Australia's alternative POI processes existed. While a small number were aware of the RA010 form and the identity review period, none were aware of Non-Reviewable Alternative Identity processes.

Being turned away from a Service Centre because of a lack of POI was most common for First Nations women in remote areas. Although Services Australia's policy suggests these women should have been able to establish their identity through use of the RA010 form or other alternative arrangements, they were not provided that option.

EJA research uncovered many cases of women locked out of social security entitlements and trapped in poverty due to their inability to satisfy Services Australia's POI requirements.

I think that the responsibility is on the person to somehow find the ID ... which I think should just change. [Services Australia should be] responding to that need and then working around [available] identification. That's a bit back to front, isn't it? People need to bring their ID to be able to get help.

— Rural Queensland

Case study – Amy

Amy is a First Nations woman in her 50s who became homeless after not having enough money to return to her home in another town.

A community worker first encountered Amy by chance when she was living under the stairs of the community organisation's building. Amy would come in the evenings after the organisation closed and pack up and leave before they opened. By the time the community organisation had a chance to talk to Amy, she had been sleeping under the stairs for more than three weeks.

Amy told the community organisation that she had no money. She had tried to talk to staff at the Centrelink office, but they'd sent her away as she didn't have any identity documents. Amy then claimed to have a cheque for thousands of dollars that she'd won through the pokies but had been unable to cash because she had no ID. The community worker thought that seemed unlikely until Amy showed her the cheque.

Amy was clearly unwell, so the community worker organised medical care. Amy was immediately hospitalised with a serious infection from sleeping outdoors in the rain and cold weather. When she was released from hospital, she still had nowhere to go so she returned to sleep under the stairs.

The community worker got in touch with a local First Nations organisation, which provided significant support. They faced multiple hurdles, including Amy being unable to get a copy of her birth certificate because she was required to order it online and did not have a fixed address where it could be posted. The First Nations organisation undertook a series of steps, including asking Elders to provide letters of support to assist Amy to finally cash the cheque.

The community worker described Amy as having 'every Elder in town helping her at the time, but the only thing that they couldn't navigate was getting her a Centrelink payment'. Amy decided to leave the town and travel home, hoping that travelling to a bigger town would assist her to obtain her social security entitlements. Some time later, Amy rang the community worker to thank her and to let her know she'd finally been able to put in a claim and her payment had just come through.

Not enough information about alternative identity processes is available to service providers

Services Australia's processes are governed by legislation and information contained in the *Guides to Social Policy Law*. However, Services Australia staff, especially frontline staff, routinely rely on information and processes provided in the Operational Blueprint.

Much of the Operational Blueprint is not available to the public, including through Freedom of Information request, given Services Australia's concern that doing so may undermine fraud prevention. This means that information about alternative identify provisions are not available to social security legal services (EJA members) or other community workers supporting people who cannot navigate Services Australia's requirements. This severely undermines advocates' effectiveness, to the detriment of the women they assist.

Recommendation 71: That Services Australia provide summary materials and undertake training of targeted community service providers on how vulnerable clients may access alternative proof of identity provisions.

Recommendation 72: That Services Australia improve training for frontline staff on use of alternative identity processes for First Nations people.

Recommendation 73: That Services Australia refer claimants living in 4R Australia to the Remote Servicing Team if they are having trouble satisfying POI requirements, so the Remote Servicing Team can undertake follow-up on the next community visit.

Some First Nations women face disproportionate and systemic barriers to POI requirements

A lot of people aren't in the welfare system who probably need it or could benefit from it ... For example, we know of First Nations people who are not claiming benefits because of all the issues around evidence, [including POI] and that sort of thing.

— Statewide Western Australia

Many First Nations women face significant and distinct challenges meeting POI requirements. A fundamental issue is the disproportionate number of First Nations people who have never had their birth registered. Pathfinders National Aboriginal Birth Certificate Project estimates the number of First Nations people without birth registration at 160,000.²³ The scale and impact of this issue has drawn international attention, with UNICEF now working on this issue in Australia.

A fundamental issue is the disproportionate number of First Nations people who have never had their birth registered. Pathfinders National Aboriginal Birth Certificate Project estimates the number of First Nations people without birth registration at 160,000.

Birth registration is important because it forms a critical first step in securing a birth certificate, which is often essential to secure other forms of POI. Yet some community workers reported the majority of their clients from remote communities do not have birth certificates.

Most of the people here in the community actually don't have a birth certificate ... Then we gotta help them to get that. Now that's hard to get that when they don't have other ID.

— Remote Queensland

Case study – Michelle

Michelle is a transgender First Nations woman in her 40s. She was removed from her parents as an infant and placed in the out-of-home care system, which included spending time in juvenile justice facilities and other institutions named in her state's inquiry into abuse of children.

Despite spending all her childhood and adolescence in government institutions, Michelle's birth was never registered, and she did not have any official identity documents. This lack of documentation persisted into adulthood and caused significant problems for Michelle, including being unable to access any social security payments.

Without access to social security, Michelle experienced long periods of homelessness and engaged in sex work for survival. During this time, she was able to obtain a Tax File Number and paid income tax for income earned through sex work.

Michelle sought assistance from a community organisation which contacted Services Australia numerous times advocating for Michelle to access income support. Their assistance included attending a local Service Centre with Michelle, where she was told to go away and register her birth, then to apply for a birth certificate in order to claim a payment. The community organisation explained to Services Australia that Michelle's complex circumstances, including her non-hospital birth in a remote community, her change of gender in adulthood, and lack of related documentation posed significant obstacles to obtaining a birth certificate.

Michelle and her advocate engaged in extended advocacy with their state Registry of Births, Deaths and Marriages. That included providing detailed information and gathering documents over a 10-year period. Eventually, Michelle was granted a birth certificate by discretion of the Registrar as establishing her identity through standard processes had proven impossible.

After more than a decade of sustained advocacy, aged in her 40s, Michelle was finally able to satisfy Services Australia's identify requirements. The first payment Michelle received was a Carer Payment as she is now caring full-time for her mother.

Service providers report that some First Nations women also struggle with variations of their name on POI documents. This issue is widely recognised. As described by Central Land Council:

Aboriginal people may have a number of names. For example, a person may have a European first name and surname, a bush name, a skin name and maybe even a nickname. Personal names are used less among relatives and community members than when the person is addressed by most non-Aboriginal people. Conversely, in some community organisations such as clinics, skin names have been frequently used like surnames. This can be a source of much confusion, heightened if a range of spellings are used.²⁴

These different names on different documents can pose significant challenges when seeking to satisfy POI requirements with Services Australia.

We have issues with variations of names, for example Brandon vs Brendon, on one ID and then the other. [Services Australia] said birth certificates [aren't] good enough where there is one skin name spelt strangely.

— Remote Northern Territory

With names here too, people often have maternal and paternal names and they're known by both of those names. And one ID ... will be Wilson and one will be Dixon and they'll be totally different. It was the same person, but they got different last names. And the spelling of names too will often change.

— Remote Northern Territory

Service providers reported that many First Nations women have been unable to access alternative identity processes and had not been provided the opportunity to verify their identity using the RA010 or other alternative POI options.

Service providers noted that use of an RA010 can be undermined by lack of recognised referees to complete RA010 in their communities, for example, when a community does not have any schools, land councils or churches. A community may have an art, language or cultural centre with strong connections and leadership, but under Services Australia's alternative POI arrangements, managers of these centres are not able to complete the RA010 for women struggling to satisfy POI requirements.

In [the closest town], they have a service ... that can supplement ID [for Services Australia] that is accepted by a variety of services in [our region]. We don't have that ... We have the language centre that can provide a form of ID, but it's not accepted by [Services Australia] or many services as a valid form of ID.

— Very remote Northern Territory

Service providers also report that some First Nations women face barriers to making a claim for a social security payment online because the system does not allow them to verify their identity using the RA010.

Many community service providers are either unaware that alternative POI processes exist, or they have had significant trouble understanding them and assisting their clients to satisfy them.

Recommendation 74: That Services Australia improve its capacity to confirm proof of identity for First Nations people where documents include traditional and cultural naming conventions.

Recommendation 75: That the Department of Social Services and Services Australia amend the *Social Security Guide* and related RA010 form to allow a broader range of appropriate community identity verification referees, in consultation with First Nations people and organisations (for example, art, language and cultural centres).

Recommendation 76: That Services Australia promote alternative proof of identity requirements for First Nations people to community organisations, particularly First Nations community-controlled organisations.

Recommendation 77: That the Federal Government and/or state and territory governments fund Pathfinders to assist more First Nations people to register their births and obtain essential POI.

Young women can face extra barriers to satisfying POI requirements

We see a lot of kids that haven't got any ID want to start getting their licence and [social security payments but] their ID has been left where they have just come from. And it's just that whole process of [getting their birth certificate] because it has to be the original document.

— Rural New South Wales



Young women regularly face challenges satisfying POI requirements, particularly when they are:

- disconnected from parents or guardians, as obtaining POI often requires parent/guardian consent
- not enrolled in school, as they do not have school-based identification
- unable to access driving-related identity documents, such as a learner's permit or licence, due to prohibitive cost, unattainable supervised driving requirements, lack of identity documents to establish POI for a permit or licence, and/or having a criminal record.

Young women can be particularly vulnerable after leaving home due to family and domestic violence, disengaging from education and finding themselves homeless or living in informal care arrangements.

Case study – Steph

Steph, who is 16 years old, was forced to leave home after being subjected to ongoing family violence from her mother, so she moved in with a family friend. She then tried to claim her social security entitlements so she could pay for board and essentials.

Steph went about gathering the required documents to support her claim, including identity documents. All of Steph's important documents remained at her family home with her mother, who refused to hand over her birth certificate or passport unless she returned home.

Steph was unable to apply for a replacement passport on her own due to her age. The process did not allow anyone but her mother, who was her legal guardian, to apply on Steph's behalf without proving they hold 'parental responsibility', which required proof such as a birth certificate or court order.

Steph had not been attending school or education programs, partly due to her unstable home life, so had no photographic student ID. She couldn't apply for a Proof of Age photo identity card as the minimum age in her state is 18 years of age. She was also unable to obtain a learner's permit as she lacked the required POI and it was prohibitively expensive.

After a protracted and stressful period, Steph was assisted by a youth service to obtain a copy of her birth certificate. The youth service paid the cost of the application.

With her birth certificate and bank card, Steph attended her local Centrelink office and was told she could make a claim for Youth Allowance. Steph was then told that she would need to provide photo identification within two payment periods for her payments to continue. Steph was unable to satisfy this requirement and her payments were cancelled.



In many states and territories, young people cannot apply for their birth certificate if they do not have requisite POI and authorisation of their legal guardian. Young people are also often excluded from applying for photo POI because they are under minimum age requirements.

Jurisdiction	Proof of Age card age requirement
Australian Capital Territory	18 or older ²⁵
Northern Territory	
South Australia	
Victoria	
Tasmania	18 or older or have parental approval
South Australia	17 years & 11 months
New South Wales	16 or older
Western Australia	16 or older
Queensland	15 or older

It is not standard practice for Services Australia staff to assist young people struggling to satisfy POI requirements to gather POI or to access Services Australia’s alternative POI processes. Instead, service providers report that young women are frequently told to go away and return with POI.

Recommendation 78: That the Department of Social Services amend the *Social Security Guide* to create specific and transparent pathways for young people without parent or guardian support struggling to satisfy standard proof of identity requirements, including referral to social workers, extending identity review periods and providing additional support where necessary.

Women experiencing family and domestic violence face substantial challenges satisfying POI requirements, placing them at risk of entrenched harm

POI requirements can be a significant barrier to social security for women leaving abusive relationships and accessing support. In some cases, women with no income are deterred by the POI and other paperwork requirements and remain in unsafe family and domestic violence situations. Sometimes women will consider returning to a violent relationship when the alternative is poverty, without access to social security entitlement.

Some victim-survivors are turned away from Centrelink offices when they do not have required POI. They don't have ID. They go to Centrelink. They're just turned away.

— Rural Queensland

When women do leave, they often leave in a hurry. Some may leave without even basic POI, but far more leave without the full range of documentation required to claim or maintain social security payments.

[POI issues are] predominantly around our women experiencing domestic violence. So, they've had to leave and if they've left quickly, they don't have all their documents. If they're not known to Centrelink previously, it takes weeks for them to get copies of anything. It's such a barrier.

— Rural Queensland

We come across women who we have to start from scratch and help them get their birth certificate and go from there ... quite a lot are missing that fundamental bit of identity.

— Remote South Australia

Centrelink rang me and said that all my husband's information was wrong and that they needed another copy of his birth certificate, his passport, his credit card details. How am I supposed to provide that?

— Regional New South Wales

People may remain in fight-or-flight mode for some time while trying to manage logistics such as finding accommodation, changing children's schools, attending medical appointments and engaging with official systems such as police, courts, and family law processes. In such contexts, obtaining new POI is unlikely to be their most urgent priority.

The cost and time it takes to secure new documents can significantly add to a person's stress and can delay their Centrelink claim, both of which increase a victim-survivor's vulnerability and the likelihood they will return to the violent relationship.

They come to us as someone [experiencing] domestic violence needing safety. They don't have access to money because they don't have ID. They need to go to Centrelink ... Centrelink sends them back. They come back here angrier, heightened. And that's a vicious cycle.

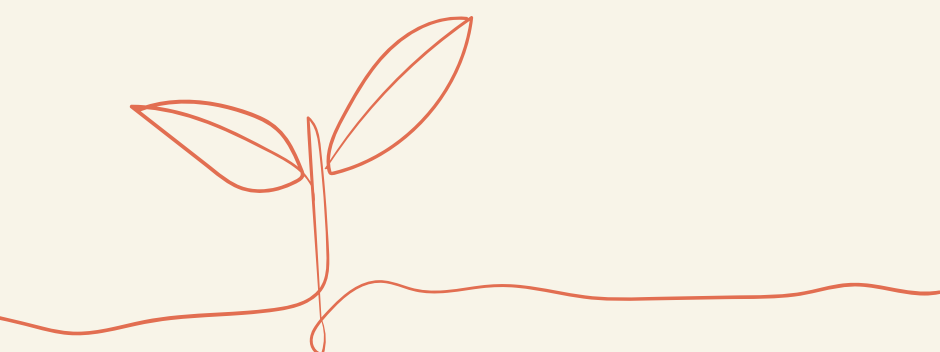
— Rural Queensland

Victim-survivors face challenges where the perpetrator has tightly controlled access to all documents and records, it is not safe to return to a property to collect documents, or an order prevents contact between the parties. Some perpetrators will deliberately hide or destroy documents.

Women's identity and their ability to be able to take their situation further [without ID] is really, really difficult ... And there [have] been ... situations where their partners' have everything, all of her stuff.

— Rural Queensland

Sometimes women will consider returning to a violent relationship when the alternative is poverty, without access to social security entitlement.



Migrant women are struggling with POI systems

When a woman who was not born in Australia makes a claim for a social security payment, Services Australia's system will automatically attempt to match the woman's details with information about their citizenship, visa status and international movements held by the Department of Home Affairs through a procedure called the 'Immigration Datalink'.²⁶ To activate that process, Services Australia must provide significant personal details and documentation including first name, surname, gender, date of birth, country of birth, travel documents and visa number of the claimant. If a woman's information is incomplete or inconsistent, it reduces the likelihood of Services Australia being able to establish a Datalink and receive the immigration information required to process the social security claim.

According to Services Australia's Operational Blueprint, if citizenship or visa status cannot be established through the Datalink, frontline staff should request documentary proof from the claimant. If the claimant cannot provide satisfactory POI documents, frontline staff should search for citizenship records on the National Archives of Australia website. If this search does not establish citizenship, frontline staff are instructed to direct claimants to contact the Department of Home Affairs themselves to apply and pay for documents establishing evidence of their Australian immigration status. Frontline staff are then to put the claim on hold awaiting evidence, without further assistance to the claimant. This instruction runs contrary to assurances Services Australia has provided to EJA that a person should never be forced to pay for POI documents.

During our interviews, service providers reported that women from migrant and refugee backgrounds struggled with standard POI process, largely due to a lack of assistance from frontline staff, system faults with the Immigration Datalink, inconsistencies of spelling and/or date of birth between their documentation, and prohibitive costs of independently obtaining standard POI documents. Migrant and refugee women also had significant difficulty accessing alternative POI processes. Although offered extra time to provide standard POI documents, they were not provided additional assistance or flexible POI arrangements.

We do have a very culturally diverse community here, so we do have some women now in their late seventies ... [and] eighties [who] have really different names. I've found that they might have one document has been written as one word name and the other one where they haven't heard it properly or confirmed, and the spelling of the name is different. And it's quite challenging as their payments will be stopped.

— Very remote South Australia

In my recent client's case, her problem [with claiming her social security entitlement] was partly the cost and delay of getting a copy of her certificate of citizenship by descent from Home Affairs, so some co-operation between government departments in relation to ID documents would be good.

— Statewide New South Wales

Service providers report that young women are frequently told to go away and return with POI.

For example, a service provider reported that some women had experienced difficulties having their citizenship certificates accepted as their 'Commencement of Identity' document. These women were long-term residents of Australia and their only 'Commencement of Identity' document was their citizenship certificate. They reported being advised by Services Australia staff that a citizenship certificate was acceptable POI, but the Agency was having trouble verifying their older citizenship certificates due to issues with the interaction between Services Australia and Department of Home Affairs' computer systems.

Issues with the automation of immigration status checks has also resulted in errors which have cancelled women's payments.

Case study – Rose

Rose fled her home country seeking safety from violence and persecution. When Rose arrived in Australia, she was granted a temporary protection visa. This visa allowed Rose to receive Special Benefit, a small discretionary income support payment.

In 2023, the Australia Government automatically converted Rose's visa into a permanent visa under the Resolution of Status visa process. This conversion resulted in automatic cancellation of Rose's Special Benefit. There was no advance warning or notification provided to Rose about this system-triggered cancellation. The cancellation left Rose without access to essential financial support for many weeks.

Rose sought help from her migration lawyer at a community legal centre. The migration lawyer identified that this issue had affected multiple clients, and they approached an EJA member centre for assistance.

The EJA member centre sought to resolve this issue directly with Services Australia but was not able to, with frontline staff telling them it was a Home Affairs issue. Seeking resolution for Rose and this group became protracted, requiring the EJA member centre to arrange a meeting between themselves and Services Australia, Department of Home Affairs, and the group's immigration lawyer. Only then were Rose and others represented by the migration lawyer able to receive the income support payments they were eligible for on their new permanent visas.

Recommendation 79: That Services Australia proactively assist people to obtain or substantiate required proof of identity documents from Department of Home Affairs when the Immigration Datalink is inaccessible or documentation inconsistencies impede data matching.

Recommendation 80: That Services Australia implement clearer guidance for frontline staff assessing POI documentation inconsistencies, including differing date of birth or spelling, aiming to expedite claims as quickly as possible.

Transgender women face unique difficulties with POI requirements

Transgender women face distinct barriers when attempting to satisfy POI requirements, particularly in 4R areas. These challenges are amplified by the intersections of gender identity, geographic isolation, and financial hardship.

While the *Social Security Guide* recognises that gender information is primarily collected to verify identity and acknowledges that individuals may identify differently from their assigned sex at birth, implementation of these policies remains inconsistent. The *Social Security Guide* states that medical treatment is not a prerequisite for recognition of gender markers, yet many services report that transgender women experience difficulties when their documentation doesn't align with their lived identity.

Many services report that transgender women experience difficulties when their documentation doesn't align with their lived identity.

The Operation Blueprint provides detailed instructions for frontline staff engaging with non-binary customers and customers who have a gender other than that assigned at birth. The Blueprint also outlines processes to enable people to state both legal and preferred names when dealing with Services Australia. Unfortunately, service providers report that these processes are not always followed.

Legal name changes present a primary barrier. The process is prohibitively expensive, with costs varying significantly between jurisdictions. In New South Wales, the fee has recently increased to \$222,²⁷ an unattainable sum for many transgender women experiencing financial hardship.

For us, the first barrier is getting clients to actually approach Centrelink because the first thing that Centrelink consists of is calling you by your legal name. And I'm sorry, if you're impoverished living in outback New South Wales, [\$222] is a lot of money to change your name legally.

— Rural New South Wales

Why can't we do the same thing in Centrelink for a trans person as at the GP - to just say, okay, we understand due to financial or other barriers, you can't change your name?

— Rural New South Wales

The challenges are particularly acute in small communities, where privacy concerns prevent transgender women from accessing services. Using identification documents that don't match lived identity can lead to forced disclosure of gender history.

Trans people won't go in if they haven't changed their name because they're outed continuously. And as I said, it's worse in country towns for that simple reason that five people in the village are all sitting in the same space hearing a name.

— Rural New South Wales

The case of Michelle (detailed above) illustrates how such challenges can compound over decades, particularly for transgender women who are also First Nations people or have experienced institutional care. Michelle's experience demonstrates how POI requirements can perpetuate cycles of poverty and social exclusion for transgender women with complex histories.

Recommendation 81: That Services Australia ensure proof of identity processes for transgender people who have not completed legal name changes are adequate, including acceptance of documentation from medical practitioners.

Recommendation 82: That Services Australia provide dedicated training for frontline staff on sensitively managing proof of identity requirements for transgender clients, including training appropriate use of names and pronouns regardless of documentation status.

Women recently released from prison or psychiatric hospital have significant difficulties with POI requirements

Social security entitlements are not payable while women are in prison or a psychiatric hospital,²⁸ so when a woman is detained, their social security payments cease (with some narrow exceptions). In practice, payments are usually cancelled as soon as a person enters detention, even for those held on remand for a short period or otherwise not yet sentenced. This does not always occur, with EJA member centres reporting instances of women incurring debts due to their payments not ceasing upon entry to prison.

Women released from prison or psychiatric confinement can, in many circumstances, claim Crisis Payment.²⁹ To be eligible they must have spent more than 14 days incarcerated and must lodge their claim up to 21 days before release or within seven days after release. Crisis Payment is equal to a week's pay at the maximum basic rate of the person's normal income support payment, for example approximately \$390 for JobSeeker Payment or \$520 for Disability Support Pension. Crisis Payment is not accessible if a woman does not have requisite POI documentation. Alternative identity arrangements may be available for post-release women who lack POI,³⁰ but specific information is contained in the Operational Blueprint and is not publicly available.

During our interviews, service providers reported that women from migrant and refugee backgrounds struggled with standard POI process, largely due to a lack of assistance from frontline staff, system faults with the Immigration Datalink, inconsistencies of spelling and/or date of birth between their documentation, and prohibitive costs of independently obtaining standard POI documents.

28 Unless you are in hospital and haven't been charged with a criminal offence, for example you are undergoing voluntary drug rehabilitation.

29 Women must meet severe financial hardship rules and be otherwise eligible for an income support payment. This does not apply to women who haven't been charged with a criminal offence.

30 Australian Government Guides to Social Policy Law. [Social Security Guide 'Persons experiencing difficulty with identity confirmation & verification' 2.2.1.40](#)

Services Australia previously employed Prison Liaison Officers to provide face-to-face services to people in prisons and detention centres. These services have now been centralised into a national Incarcerated Customer Service Team which does not attend prisons in-person.

Services Australia has recently moved to a model that allows incarcerated persons to contact the Agency's Incarcerated Customers Team by phone up to three weeks before release to arrange their post-release social security payments, but there is no data currently available on the success of this strategy. For people held short term on remand, or with an unexpected or unconfirmed release date, this model is problematic.

Service providers report that some women are being released from prison and psychiatric confinement back into their communities without access to their social security entitlements, and no immediate prospect of payment. Frequently, women face difficulty making their way to a service centre without funds and lack enough POI to make a claim when they get there. Alternative POI arrangements are not routinely offered. This is particularly problematic for women in 4R areas where services and support are minimal to non-existent.

She had no ID. She'd been released from prison in [capital city]. She got on the train to [rural town], got off here to get food, couldn't find her ticket, and never got back on ... I'm a JP, so we wrote a Stat Dec, and did all the things that I could possibly do to try and [get Centrelink to accept her claim ... but was not successful].

— Rural Queensland

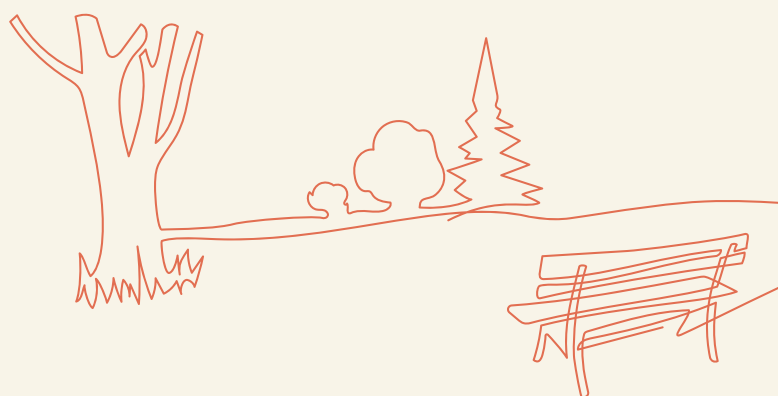
A mental health patient, they're lucky to know what day it is, let alone keeping all their ID together. And especially if they're transient, moving from town to town to town ... So, if you go to [nearby town] it's all self-service [at Centrelink] ... they wouldn't sit down with you and do the application with you and do the one-on-one support.

— Rural New South Wales

Why can't we have our governments going into the prison and just doing ... I mean you've got the people there and say, just do an audit of who hasn't got a birth certificate? And then when they leave, I mean you sending someone off with a better life and have their benefits set up and ready to go.

— Statewide Australian Capital Territory

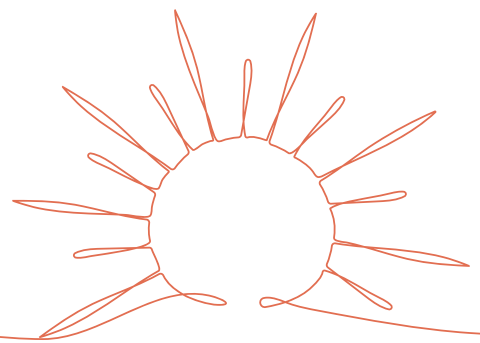
Frequently, women face difficulty making their way to a service centre without funds and lack enough POI to make a claim when they get there.



Recommendation 83: That Services Australia ensure access to Prison Liaison Officers in all jurisdictions to ensure pre-release services are provided to all women held in detention, so they are able to troubleshoot proof of identity issues and access their entitlements without delay upon release.

Recommendation 84: That Services Australia investigate how they may integrate use of prison institutional documentation as a satisfactory form of proof of identity, for example prisoner photo identification, official bail paperwork and medical documents.

Recommendation 85: That Services Australia develop a mechanism for direct contact between prison and hospital staff, related support services and Services Australia's Incarcerated Customer Service Team to ensure women are supported to access their entitlements.



Access to internal reviews

I've had clients [who] are actively getting stalked by the perpetrator ... One ARO said, 'We appreciate you've been getting actively stalked. You're an ongoing victim of domestic violence for the last four years. Your ex shook your baby... leading to him getting significant brain damage, but you didn't lodge your tax return on time, so your debt remains.'

- Rural Queensland



Key findings

29. Access to internal review is undermined by systemic barriers including low awareness of review rights, with many women in regional, rural, remote and very remote (4R) areas unaware they can challenge an unfavourable decision.
30. Frontline staff do not consistently inform women that review is available or adequately explain the review process where women are unhappy with a decision – a missed opportunity to alert women to their right to review.
31. The two-stream review process, comprising explanation and formal review, creates confusion and delays, at times effectively requiring women to request review twice.
32. Internal review systems appear chronically under-resourced given extensive wait times for Authorised Review Officer (ARO) reviews, leaving many women in limbo and with no way to track how or if their review is progressing.
33. The quality of ARO decisions varies, with many not fit for purpose – lacking detail, consideration of the woman's specific circumstances, and understanding of 4R contexts.
34. Mechanisms to feed learnings from reviews back into the system appear deficient, including feedback to original decision-makers, capture of insights from external review decisions, and mechanisms for identifying and addressing systemic issues.

How does Services Australia's internal review system work?

Services Australia makes many millions of decisions each year, from simple decisions about whether a person has reported their income, to complex eligibility assessments based on a person's individual circumstances. Given many women who receive a social security entitlement rely on those payments to make ends meet, it is essential they have access to a reliable and transparent method for review of decisions they believe are incorrect.

The right to appeal a decision made by Services Australia is built into the social security system. These provisions sit within the domain of administrative law – the body of law that regulates government decisions. Under administrative law, the term 'merits review' is used to describe an appeal, although the terms 'appeal' and 'review' are regularly used interchangeably.

The first step to exercise the right to review of a social security decision is Services Australia's internal review system. (External review processes are referenced below in Chart 1, and considered in detail in Chapter 5.) While the internal review process is important to ensure people receive correct and consistent decisions, and consequently their correct entitlements, it also provides a mechanism for Services Australia to identify and remedy systemic decision-making problems, limiting the need for reviews of decisions based on those same issues in the future.

Many decisions regarding social security payments have a time limit. The most common is the 13-week time limit to seek an internal review which enables arrears to be paid from the date of the original decision. For example, if a person claims Age Pension and their claim is rejected, and they appeal within 13 weeks and are successful, they will be paid arrears back to the date of their original

claim – even if the review takes weeks or months. If a person lodges their appeal after more than 13 weeks, they can seek a review but any arrears will only be paid from the date they sought the review.

The Social Security (Administration) Act outlines Services Australia’s legal obligation to provide an internal review process for people who disagree with a Centrelink decision,³¹ and an obligation to provide adequate information about the appeal system and peoples’ right to appeal.³² This process has taken slightly different forms at times, but currently the review process is divided into two distinct options:

- 1. Explanation of a decision.** A Subject Matter Expert (SME), who is an experienced officer, can provide more information and explain why a decision was made. An SME can also change the decision if they find it was incorrect.
- 2. Formal review.** An Authorised Review Officer (ARO), who is a specialist experienced Services Australia officer authorised to conduct internal reviews, can change the decision if they find it is incorrect. They are also required to explain their reasoning for upholding or changing the decision.³³

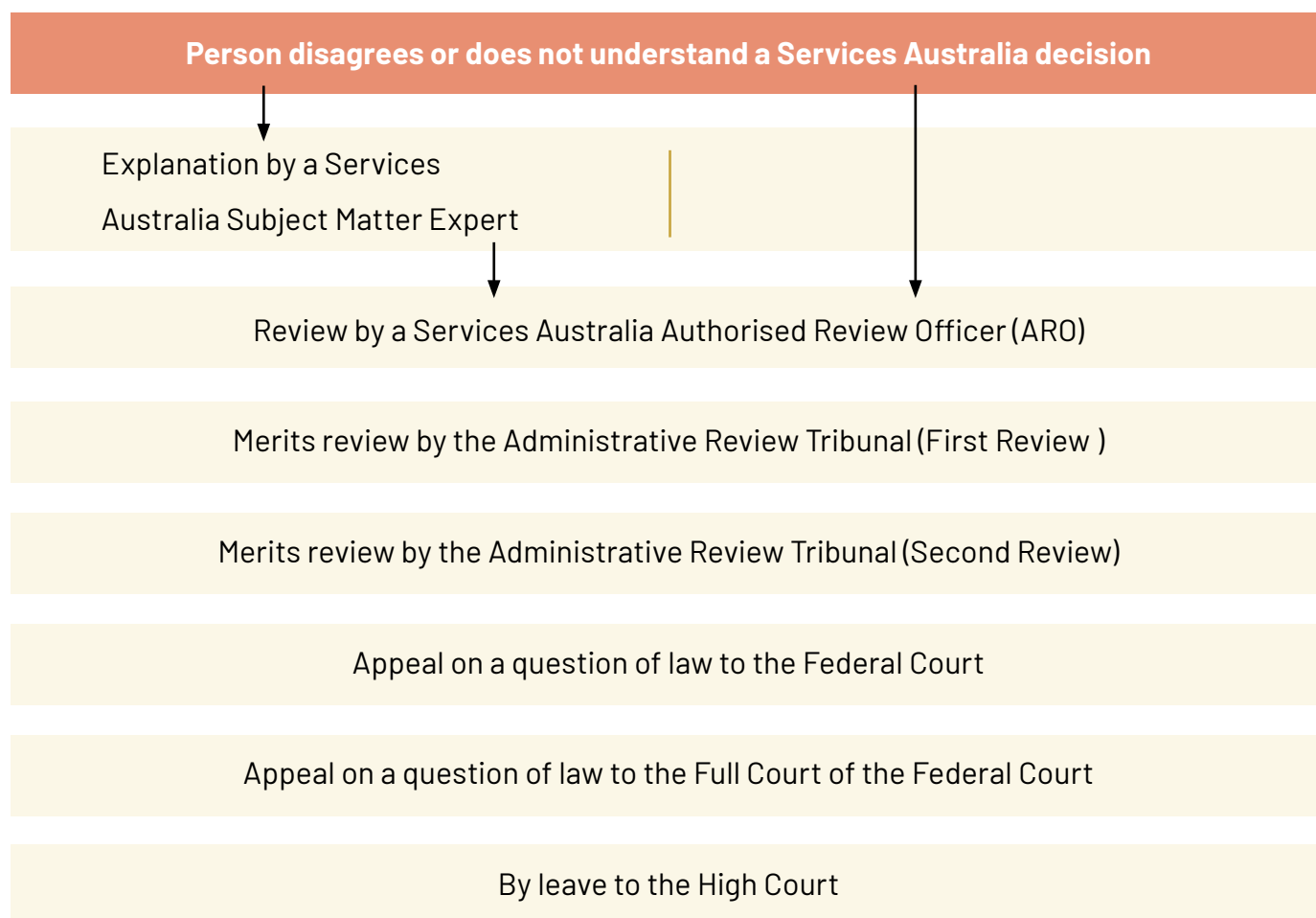
Given many women who receive a social security entitlement rely on those payments to make ends meet, it is essential they have access to a reliable and transparent method for review of decisions they believe are incorrect.

31 Section 135 of the Social Security (Administration) Act 1999 (Cth) prescribes the review of a decision following application by a customer (under Section 129 of the Act)

32 Section 8 and Section 138(1)(a) of the Social Security (Administration) Act 1999 (Cth)

33 <https://operational.servicesaustralia.gov.au/public/Pages/review-of-decision-and-appeals/109-03000000-01.html>

Explanation and review can be understood as fitting within the full administrative law review process as follows:



In theory, people can access internal review simply by asking for it, using any form of words that suggest they disagree with, or don't understand, a decision. People can also lodge a request for formal review or explanation in writing by using the SS351 form (Explanation or formal review of a decision).

When a request for formal review is lodged with Services Australia, by phone or in writing, it is allocated to an ARO. Previously located in Area Support Offices and Service Centres,³⁴ AROs are now located within the Appeals Branch in the Payments and Integrity Group. AROs' geographic focus has also changed. Where once they would undertake reviews within their geographical region, AROs are now allocated reviews through a centralised digital system irrespective of their physical location.

As of 31 May 2024, there were 195 AROs employed by Services Australia.³⁵ Over the last reporting period, there has been a decline in the number of AROs, and an even sharper decline in the number of senior AROs.

³⁴ [ANAO Audit Report No.16 2010-11 Centrelink's Role in the Process of Appeal to the Social Security Appeals Tribunal and to the Administrative Appeals Tribunal](#)

³⁵ Information provided to the Senate Community Affairs Legislation Committee by Services Australia in July 2024 (SA SQ24-000430 2024-25 Budget estimates)

Table 1: Decline in number of AROs³⁶

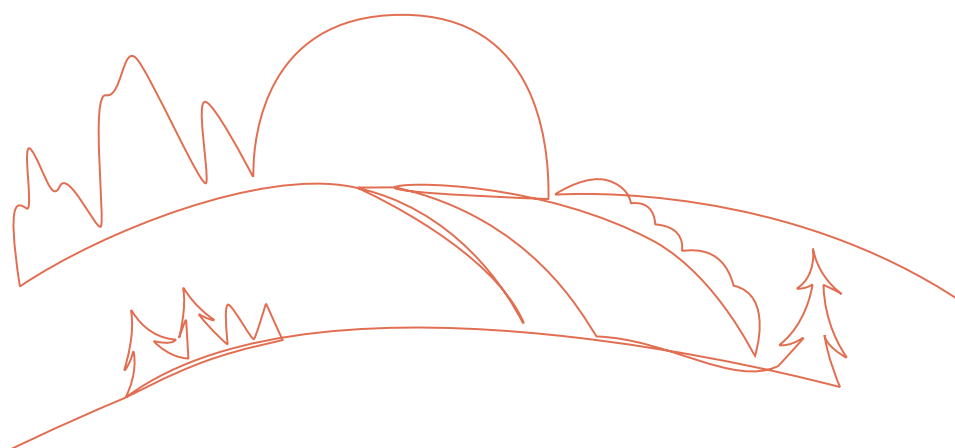
Role	2021-22	2022-23	2023-24 (to 31 May 2024)
APS6 Senior Authorised Review Officers	232	211	153
APS5 Authorised Review Officers	45	51	42
Total	277	262	195

Services Australia is required to meet key performance indicators, with a timeliness standard set at:

- **Explanation of decision:** 70 per cent delivered within 14 days of a request.
- **Formal review (by ARO):** 70 per cent completed within 49 days of a request.³⁷

This timeliness standard is regularly surpassed, with specialist social security legal centres (EJA member centres) reporting ARO decisions frequently take four to six months at a minimum. As of 31 May 2024, there were more than 52,000 formal reviews waiting to be processed by AROs – an increase from each of the previous four financial years.³⁸

There have been multiple audits of Services Australia’s internal review system undertaken over the past 20 years. Notably, Australian National Audit Office audits of the internal review system in 2004/2005, 2006/2007 and 2010/2011 provided substantial insights and feedback. Although Services Australia modified its internal review system to with the goal of improving access in 2021, many of the observations earlier made by the Australian National Audit Office remain strongly relevant.



³⁶ Information provided to the Senate Community Affairs Legislation Committee by Services Australia on 25 July 2024 (SA SQ24-000430 2024-25 Budget estimates)

³⁷ <https://operational.servicesaustralia.gov.au/public/Pages/review-of-decision-and-appeals/109-02000000-01.html>

³⁸ Information provided to the Senate Community Affairs Legislation Committee by Services Australia on 25 July 2024 (SA SQ24-000427 2024-25 Budget estimates)

What is working well?

The internal review process has a critical function, providing a mechanism for people to tell Services Australia when they disagree with a decision, and to provide more information to clarify their circumstances when they don't understand a decision.

In some instances, understanding the decision has enabled women to seek new or more detailed evidence and lodge an external appeal or a new claim.

AROs review a significant number of decisions each year, overturning many in favour of the person seeking review. This gives some confidence in the capacity of the internal review system to provide people access to their correct social security entitlements.

The expertise of AROs is highly valued. The social security system is inordinately complex and people's lives are extremely varied, so a sophisticated understanding of social security law and policy is required for AROs to be able to effectively review decisions.

Service providers report that when ARO decisions are detailed and of high quality, they are appreciated by their clients and provide reassurance that the social security system is operating correctly,

both in terms of process and decisions made. This has included instances where people have been unsuccessful in their appeal but valued understanding why the original decision was made. In some instances, understanding the decision has enabled women to seek new or more detailed evidence and lodge an external appeal or a new claim.

Areas where well-considered internal appeal decisions appeared to be common included:

- Coronavirus Supplement and related debts
- extending time limits for ABSTUDY decisions
- Assistance for Isolated Children-related matters
- some Disability Support Pension decisions.

Service providers also raised the effectiveness of timely ARO decisions, which provide minimal disruption to people's lives and often enable access to correct social security entitlements.

What needs to change?

Access issues

Low community awareness of the right to seek review

Women's awareness of the internal review process remains problematically low. Many women do not know they can request an internal review when they disagree with a Services Australia decision. All community legal service staff interviewed by EJA stated that most of their clients had not known they could 'seek an internal review' of a social security decision before contacting them for advice.

When service providers were asked if their clients generally know they can ask for an ARO review before seeking legal advice, they responded:

No, no, never, almost never... [Our service] almost never encounters a client who is aware of this, despite the high volume of work we do in remote communities ... I've had one person [who] had already done an ARO review, but they didn't know that they'd done it. They'd called up and it had been a verbal conversation that triggered the review, but they didn't know really where they were at in the process.

– Remote Northern Territory

Generally, mostly no. If they do, they don't know how to do it or they don't understand what it is, that it's free or what the risks are, so [they] rarely have taken this step themselves.

– Statewide Victoria

I would generally say half do [know about the internal review process]. However, if they do, they do not know exactly what an ARO is.

– Regional Victoria

Notably, legal services in a cross-section of 4R areas reported that when women are particularly vulnerable because of homelessness, family violence, ill-health, or poverty, they are less likely to be aware of their right to seek an internal review.

We find that people [who] are highly vulnerable do not [know about internal reviews].

– Statewide New South Wales

Understanding of internal review rights is also low amongst women with intellectual impairments and women for whom English is not their first language, First Nations women,

and migrant women. Services Australia's website includes information on appeal rights in numerous languages other than English, including text and audio in Aboriginal and Torres Strait Islander languages. Services Australia's Operational Blueprints also advise staff how to assist customers with limited English, including how to access interpreters. Despite that, service providers report that many First Nations and migrant women struggle to navigate Services Australia's appeals system, with language a critical issue.

We know that language barriers can prevent understanding of internal review processes generally.

– Statewide New South Wales

All community legal service staff interviewed by EJA stated that most of their clients had not known they could 'seek an internal review' of a social security decision before contacting them for advice.

Poor communication about appeal rights

Service providers report that low awareness is partly due to a lack of general promotion – for example, by phone and written communication – of review rights and processes, including the way Services Australia communicates information about the possibility of a review and when a decision has been made.

Since late 2022, Services Australia has been engaged in a co-design process with key advocacy groups, including EJA, to improve Services Australia's Account Payable letters, which are sent when a person learns they have a social security debt. Services Australia has also conducted a number of customer interviews to inform letter design. While these letters have improved, their effectiveness remains limited. Most contain very limited information about the reason for the debt, preventing the recipient from checking whether the information Services Australia has relied upon is correct. It is possible for recipients to contact Services Australia to check details but many don't. Many women are unwilling to spend time going up against 'big government' and a very complex system while having very limited time and material resources.

Most letters contain information about seeking a review, yet service providers consistently report that people do not understand they can seek a review or how to go about doing so.

I think its that the language [Services Australia uses], maybe people might think they have the ability to make a complaint but I've never had anyone say that it was explained to them verbally. I know it's in the letters and it's sort of on the second side of the letter, but if you look at a debt notice letter for example, it's not really prominent.

— Remote Northern Territory

They often think that, when speaking to Centrelink on the phone about appealing an incorrect decision, [an appeal] has been made but it does not actually trigger the process to start. Most clients are not aware that there is a form you can complete. They don't know it's an option. The debt letters to clients are not understood.

— Regional Victoria



Confusion between 'an explanation' and 'a review'

Many women are confused about the distinction between requesting an explanation of a decision and requesting a review of a decision. Service providers report that clients have inadvertently sought an explanation first, then when the decision wasn't changed, they were told they would need to seek an ARO review, so they felt like they'd needed to request a review twice.

This situation is likely arising because Services Australia staff are directed to take a customer's confusion or request for more information as seeking an explanation only. Diversion to an 'explanation' can cause confusion and distress for women as additional information is not routinely sought, so an explanation may fail to consider the situation in detail or to change the decision. Women may also believe that an explanation is an ARO review.

A client can often confuse an explanation of decision with an ARO. They will believe they received an ARO when they only got an explanation. The reasons are not put in writing when an explanation is given so clients can struggle to explain why a decision was made. There can be confusion about time limits when an explanation of a decision is requested, such as when the 13-week limitation commences ... from date of decision or date of explanation? There are issues when clients request an ARO but are given an explanation of a decision instead and told that it is the policy to provide an explanation first even if an ARO is explicitly requested.

— Statewide New South Wales

In our experience, clients always struggle to understand, even when choosing the option to seek an explanation. It confuses the review process as often the explanation is different depending on who you speak to at Centrelink, which leads to increased confusion as to why exactly a decision was made.

— Regional Victoria

Many women are unwilling to spend time going up against 'big government' and a very complex system while having very limited time and material resources.



The case study below highlights difficulties encountered in this two-stream process, and consequent confusion, delays and distress it can cause.

Case study – Mary

Mary is a sole parent with four dependent children. In 2019, Mary received three letters from Services Australia advising she had three Family Tax Benefit (FTB) debts for three separate financial years. Each of these letters stated: 'We have now checked your entitlement for the [...] financial year using your annual family income and your family circumstances and you received more Family Tax Benefit than you were entitled to.'

Mary could not understand why she had these debts as she had been receiving Parenting Payment and no other income throughout the period in question. There had been no changes in child support (collected by the Child Support agency), or any issues with shared care. Services Australia had also paid her the FTB supplements every financial year for each of her FTB children.

As soon as Mary received the debt letters, she contacted Services Australia to ask why she had the debts. Services Australia gave her no information aside from the text of the debt letter, and she was told she had to repay the money. Mary asked for a review by an ARO and was told it was not a priority review, and that they were unable to provide a timeframe for the review. She was given an appeal number.

Mary contacted Services Australia four times over the following 18 months and asked what was happening with her ARO review. Twice she was told the appeal was in progress and there was no timeline for it to be completed.

In 2021, more than two years after Mary had lodged her request for ARO review, she was told by Services Australia that she would be contacted with an explanation of the decision and it would then be possible for her to ask for an appeal.

One year later again, in 2022 and still with no written or verbal explanation received, Mary sought assistance from an EJA member centre stating she was upset that she was having to repay FTB debts which she didn't believe were right, that no one at Services Australia could explain why she had these debts, and that no result had been received from her request for an ARO review.

Mary's lawyer lodged a Freedom of Information (FOI) request in the hope they could discover why Mary had the FTB debts, and to provide Mary with legal advice. Mary's lawyer also contacted Services Australia and was advised the matter had been escalated for an 'explanation of decision' and that if Mary wanted to appeal to the ARO she would have to request this during the 'explanation call'.

In early 2023, Mary's lawyer received the FOI documents. These provided very little information about the debts, as any information that may have related to the debts was deemed by Services Australia to be exempt under s 38 of the Freedom of Information

Act 1982 (Cth). Mary's lawyer again contacted Services Australia and asked what was happening with the ARO review of Mary's debts. Mary's lawyer was advised the debts had been referred to an ARO. Mary's lawyer encouraged Mary to lodge a complaint with Services Australia.

Some months later Mary was contacted and told the debts did not exist and that the money she had repaid would be refunded.

The extensive delay in reviewing these debts caused Mary immense stress and the recovery of these debts has impacted greatly on Mary's ability to pay her day-to-day living expenses. She and her children frequently had to go without necessary items.

Diversion away from seeking review by frontline staff

When women seek assistance from frontline staff about a decision they disagree with, they are sometimes dissuaded from seeking an internal review, told they can't lodge a verbal request for review, or are misdirected to seek an explanation of the decision instead of a review.

Clients are often told the decision is correct and it is a waste of time appealing. Some staff, particularly in small country offices, discourage the lodgement of appeals. While there is a form for the lodgement of an appeal to an ARO, these forms are seldom issued over the counter by staff when people attend their local office seeking an explanation.

— Regional New South Wales

Services Australia's staff discouraging reviews is a serious matter, not only because it denies women their legal right to review, but often it also occurs in a context of women failing to understand the independent nature of reviews.

Clients are told they must fill out a form, and review is not accepted verbally. [There are] huge delays in getting AROs processed. When it is accepted, they are not actioned. Massive delays. Even when a form is completed, or the client is told when lodging verbally that the review is recorded, they are given an explanation of a decision instead of an ARO review.

— Statewide New South Wales

Services Australia's staff discouraging reviews is a serious matter, not only because it denies women their legal right to review, but often it also occurs in a context of women failing to understand the independent nature of reviews. Service providers report that even when women are made aware of their appeal rights, some will balk at requesting a review because they fear negative consequences if they disagree with a staff member, including discrimination. They fear it will be perceived as causing trouble.

Recommendation 86: That Services Australia provide more detailed explanations for decisions as a default, increase opportunities for customers to clarify and ask questions, with the aim of avoiding need for administrative review.

Recommendation 87: That Services Australia increase frontline staff's capacity to advise people about explanations and Authorised Review Officer reviews.

Recommendation 88: That Services Australia explicitly inform people who request a review that they are not obliged to agree to an explanation and have a legislative right to go directly to an Authorised Review Officer.

Recommendation 89: That Services Australia develop targeted education campaigns to increase understanding of internal review systems, including strategies to reach people with minimal English comprehension (for example, through translation and use of visuals such as flow charts or infographics).

Resourcing issues

In addition to difficulties accessing internal review, many women struggle with lengthy delays receiving ARO decisions and being unable to seek updates on the progress of their review.

Throughout our interviews, we regularly heard about women who had experienced delays of 12 to 18 months before receiving the outcome of their ARO review. Despite Services Australia's Operational Blueprint instructing staff to identify when a customer's vulnerability requires a priority explanation or review, community service providers see women who are left without any income. Service providers reported that women were only able to access the 'payment pending review option' with specialist social security legal assistance to advise frontline staff on this option. During these delays, women were not updated on the progress of their review and were dissuaded from contacting Services Australia, causing significant distress.

Long delays are leading to circumstances that service providers describe as 'appeal fatigue'. With current wait times extending well over six months, service providers are seeing women who say they are ready to 'just give up'. That has serious implications regarding not only the ability of individual women to access their rights, but also the integrity of the system.

Long ARO delays impact women's resilience. If women experience long wait times as emotionally taxing, they may be reluctant to appeal in future. Further, they may be unwilling to appeal to the Administrative Review Tribunal (ART). Legal service providers reported instances of women, who had waited many months, receiving an ARO decision that upheld the original decision. These women were then unwilling to appeal to the ART despite the solicitor advising of a high chance of success. The women were reported to have said the process was 'all too hard' and they were exhausted by the 'issues with Centrelink' and couldn't handle more time 'being in limbo'. They'd rather 'go without'. At times, that meant women living in abject poverty.

Social security law is complex. While some decisions are simple, many are not, so require not only specialist knowledge but considerable time and effort. The ARO review process includes reviewing existing documents, considering law and policy, seeking additional clarifying information from the person seeking review and third parties where appropriate, and drafting and delivering a decision.

As of 31 May 2024, Services Australia had only 195 AROs to deal with the approximately 52,000 outstanding requests for ARO review, with more requests for review lodged every day. Urgent resourcing is required to address the backlog of ARO decisions and get the system working

effectively. EJA understands this poses real challenges for Services Australia, as it requires the identification and appointment of experienced and highly trained staff. This in turn relies on candidates being drawn from Services Australia's current staff, noting many have been employed for a relatively short time and are also relatively junior.

Recommendation 90: That Services Australia allocate resources for additional Authorised Review Officer positions to alleviate delays and significant backlog of requests.

Recommendation 91: That Services Australia implement a tracking system that allows people to monitor their review status.

Recommendation 92: That Services Australia regularly publish data on review (Authorised Review Officer and explanation) timeframes, outcomes, and related demographic data.

Output issues

Quality of ARO decisions highly variable

While well-constructed ARO decisions are highly valued, service providers report that ARO decisions frequently fail to meet the standards required for fair and effective merits-based review of social security matters.

Service providers were highly critical when describing poor quality and incorrect ARO decisions.

AROs appear to approach their matters with the view of trying to block favourable decisions rather than trying to assist the client and to ensure that social security and family assistance law is applied in a beneficial way.

— Statewide New South Wales

Service providers identified a number of areas where ARO decisions were more likely to be of poor quality, failing to address specific relevant factors relating to the assessment of:

- member of a couple criteria where coercive control is present
- special circumstances debt waiver specifically relating to family and domestic violence

- compensation preclusion periods
- mutual obligations
- Newly Arrived Resident's Waiting Periods
- dependent child or family member who is a refugee
- mental health and related impacts.

I've got really strong views on AROs. I think most of 'em are very inadequate at what they do. How do I say this nicely? They look at [a review] as more of like a tick-and-flick role. Like last week I had a client, the extent to which the family domestic violence had taken over her life, and the impact that had on her was not even mentioned once in the ARO decision. When they give you the blurb about the reasons for the decision, they just said, "Your income estimation was significantly lower than your actual taxable income". There are no special circumstances considered, there's no admin error considered. 'Good faith' is not going to help you.

— Rural Queensland

Services providers who had been in the sector for many years lamented the slow deterioration in quality of ARO decisions over the past two decades. That included a reduction in the number of detailed decisions that fully addressed criteria, and a seeming unwillingness to apply discretion.

Among some legal service providers, there was a sense that in many instances, seeking ARO review was only a means of getting to the Administrative Appeals Tribunal (AAT)/Administrative Review Tribunal (ART). This was not because of the legal complexity of the case, but because the Tribunal is perceived as more likely to consider the specifics of the person's circumstances against the relevant law and policy, and to apply appropriate discretion where required. That suggests some ARO decisions are not being carefully made or described. After all, the question at ARO and AAT/ART remains the same: whether the individual woman fits within the legal and policy boundaries determining entitlement.

Lack of knowledge of lived reality in 4R areas

Often the quality of decision-making is compromised by Services Australia's poor understanding of the situations of women living in 4R areas and remote servicing limitations.

Service providers report that AROs regularly ignore or reject common aspects of life in 4R areas, even when specific relevant factors are included in review submissions:

- Limited access to medical, health, and psychological services.
- Lack of digital connection, and limited access to devices and digital skills.
- Low literacy, and limited English language and comprehension, including in remote First Nations communities.
- Limited access to support from charitable organisations, social services and other community services.
- The specifics of family relationships and dynamics in 4R and First Nations communities.

With current wait times extending well over six months, service providers are seeing women who say they are ready to 'just give up'.



The application of metropolitan-centric assumptions to the circumstances of women living in 4R locations suggests a lack of rigor undermining the review process.

[The difference between ARO decisions for those outside the cities and those in metro areas] has been demonstrated in DSP rejection decisions where medical evidence is not readily obtainable in regional areas, but applicants are treated the same as urban clients. And reasonable treatment is not adjusted for location ... when job search requirements and mutual obligations are different for people in regional areas.

— Statewide New South Wales

Service providers reported that ARO decisions often failed to address critical accessibility barriers in 4R areas, so it remains unknown whether those issues have been considered, or whether they were considered and discounted.

The misalignment of metropolitan assumptions and 4R realities extends to poor understandings of language challenges and cultural differences inherent in women's experiences that affect their capacity to access those entitlements.

I am not sure AROs always truly grasp the complexities of living in extremely remote places, the linguistic challenges and the cultural differences to our clients' stories. For example, when I have spoken to an ARO regarding the recent FTB debt and 'care' decision, the ARO likened my remote Aboriginal client's situation to 'all grandmothers', which I don't think is quite right, notwithstanding many grandparents do have care under shared arrangements.

The situation in remote communities is so vastly different to that of ARO decision-makers in major centres that they will need proper specific training to fully understand it. Every assumption they may have could be incorrect.

— Remote Northern Territory

Poor documentation of decisions

Broad structural issues impact the quality of ARO decision documentation, particularly the documentation of those decisions in ARO letters. Many review decisions suggest case-specific facts have not been considered, simply citing policy guidelines without describing application of those guidelines to individuals' circumstances. This weakness is particularly evident in special circumstances considerations and debt waiver cases.

ARO decisions do not always reflect knowledge of widespread and systemic issues

Services Australia has a number of systems in place to monitor and improve ARO decisions. Explanations of Decision, Formal Reviews and ART information is recorded in the agency's Appeals System and distributed to relevant business areas to identify improvement opportunities. The Legal Services Division also scrutinises ART decisions and provides feedback to relevant program and business areas, including the Appeals Branch, as they deem appropriate.

Despite that, service providers report ongoing issues, which they attribute to lost opportunities for ARO reviews to improve decision-making across Services Australia. This includes:

- inadequate tracking and analysis of review decisions, limiting identification of patterns, trends and areas requiring improvement
- poor incorporation and application of insights from tribunal decisions that overturn ARO determinations
- weak feedback loops to original decision-makers so they can understand where they have made errors and how they can improve their decision-making
- lack of robust systems for capturing and addressing recurring issues, which allows the same problems to persist without resolution
- inadequate monitoring and evaluation of decision patterns, preventing meaningful improvement in service delivery and review quality.

The current ARO system demonstrates weaknesses in its capacity to learn from experience. Legal service providers argue that Services Australia fails to effectively capture and apply lessons from ART decisions that overturn ARO determinations, noting they continue to get decisions from AROs where similar decisions have previously been overturned at AAT Tier 1 (now ART First Review).

Variable decision quality reflects inadequate quality control processes and limited peer review mechanisms. Documentation standards remain inconsistent, with many decisions lacking the detail necessary for people to understand outcomes. AROs frequently make decisions without demonstrated local knowledge of the communities they affect, and many show limited awareness of systemic issues facing social security recipients in 4R areas.

Notably, the ARO branch operates separately from the Legal division. Analysis of trends and patterns in decision-making is essential for meaningful improvement of service delivery and the internal review system.

Recommendation 93: That Services Australia ensure Authorised Review Officers' caseloads allow adequate time to deliver clear and detailed decisions.

Recommendation 94: That Services Australia review Authorised Review Officer training and quality control measures, including reintroducing geographic or subject matter specialisations, increasing information flow between Authorised Review Officers and legal branch staff, reviewing KPIs to ensure they are not limiting quality of decisions, and ensuring processes for Authorised Review Officers to raise and escalate systemic issues.

Access to external review

Knowledge [of external review processes] is low ... It's such a complex system with so many rules that knowledge across the board is low. People need help. They need information. They can end up in really bad situations sometimes without that.

- *Statewide New South Wales*



Key findings

35. Women in regional, rural, remote and very remote (4R) areas face significant barriers to external review, preventing many from exercising their appeal rights.
36. External review processes and procedures are predominantly designed for city contexts, with limited technology and poor digital infrastructure in 4R areas preventing effective servicing, leaving many women unable to meaningfully participate in phone or video hearings.
37. The absence of an Administrative Review Tribunal (ART) registry in the Northern Territory may be contributing to women's low engagement with external review in that jurisdiction.
38. Services Australia and the Department of Social Services' problematic engagement with external review processes – including lack of early resolution efforts, delay in implementing decisions, failure to systematically learn from Tribunal decisions – can create unnecessary delays and costs while prolonging hardship for women seeking to access external review of social security decisions.
39. Tribunal decisions regularly fail to properly account for the realities of 4R living, including higher costs of living, limited medical and support service availability, the impacts of poverty, and cultural factors that affect women's ability to claim and meet payment requirements.
40. Social security legal services lack adequate resources to provide comprehensive assistance to women in 4R areas, leaving many without access to the support and expertise required to effectively navigate the review process.

How does the external review process work?

Social security decisions, like many administrative law decisions, can be reviewed through an external merit review process. Where a person disagrees with a social security decision made by an Authorised Review Officer (ARO) they can seek an external review by the Administrative Review Tribunal (ART), which replaced the Administrative Appeals Tribunal (AAT) in October 2024.

EJA's research was conducted during this period of significant institutional change, with service provider interviews conducted during the final months of the AAT. Service providers' observations remain relevant to its successor, the ART. Despite the institutional transition, structural issues identified during this research continue to limit access to social security and related rights. The establishment of the ART presents a unique opportunity to address longstanding issues.

The ART retains a two-tier structure for social security matters:

- First review deals with decisions that have been reviewed by an ARO.
- Second review deals with decisions made at the first review stage of the ART.

If someone remains unsatisfied after a second review, they can appeal to the Federal Court of Australia – but only to challenge legal errors, not the merits of the case.

The ART also has a new mechanism called the Guidance and Appeals Panel which can review matters considered of significance to administrative decision making that may contain an error of fact or law.³⁹ This mechanism aims to ensure that important issues are scrutinised by experienced members, with their findings communicated to Services Australia and other interested parties to ensure the point of law is well articulated and understood. Referral of a case to the Guidance and Appeals Panel is only available for social security decisions at the discretion of the President.

The ART's stated intention is to be accessible to all Australians, which includes conducting both in-person and remote proceedings. The *Administrative Review Tribunal Act 2024* (Cth) is the foundation for the ART's operations. Section 9 of the Act establishes that the Tribunal must operate in a fair, just, informal, accessible, and responsive manner. Section 51 specifically requires proceedings to be conducted in a way that accommodates the needs of all parties. Under Section 36, the President of the ART has the authority to issue practice directions regarding accessibility and responsiveness to diverse party needs.

The ART maintains physical registries in all Australian capital cities (and Norfolk Island) except Darwin, with Northern Territory cases managed by the Adelaide registry.⁴⁰ People can attend a hearing either at a registry office or participate remotely through phone or video calls. Similarly, applications and documents can be submitted in person, over the phone, via email, or through the ART's online services.

The ART handles first reviews in a relatively informal, interview-style format, typically without lawyers present. The second review process operates more formally, though less formally than a court, with DSS legal representatives present.



39 Administrative Review Tribunal (Guidance and Appeals Panel) Practice Direction 2024 at 1.9

40 Accessibility Plan: Remote and less mobile users', Administrative Appeals Tribunal, September 2020. Available through the AAT Freedom of Information disclosure log.

As of February 2025, there are minimal guidelines or factsheets available from the ART, and there are no practice directions tailored to social security matters. EJA hopes the findings of this research will inform the development of a comprehensive and inclusive framework for the new Tribunal.

What is working well?

External review is a vital independent mechanism allowing people to have decisions made by Services Australia changed if found to be incorrect. A significant number of people access external social security review, with about 9,000 cases reviewed last year.⁴¹

Establishment of the ART has included several promising developments aiming to improve access to justice for women in 4R Australia.

The ART's Commitment to Accessibility and Inclusion explicitly recognises the needs of people living in 4R locations. This formal acknowledgment of accessibility challenges, and commitment to address them, marks an important shift in institutional awareness and sets a foundation for future improvements.

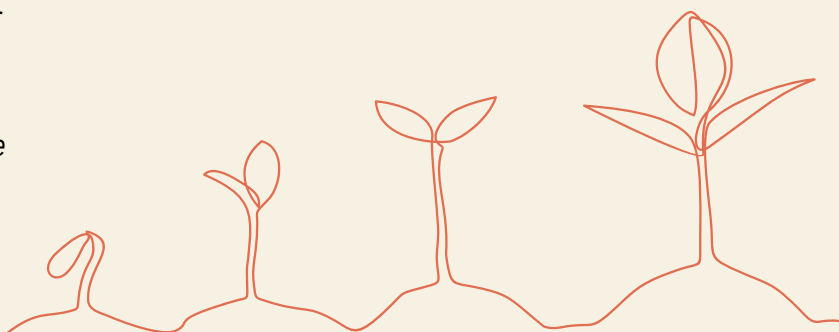
Several of the channels available for engaging with the ART benefit women living in 4R Australia, including:

- online lodgement of applications
- telephone applications
- in-person lodgement where available
- remote hearing participation through telephone or video conferencing

This flexibility in service delivery can reduce the travel burden for women who do not live close to an ART registry.

When my client heard she could appear [at her hearing] remotely, she said "Oh well, in that case, I'm not going to make the effort to come all the way into Adelaide when I can be over the phone or over Teams."

— Statewide South Australia



41 AAT Caseload Report, 1 July 2023–31 May 2024.

Another significant development is the ART's planned First Nations Liaison Officer Program. This initiative aims to employ First Nations Liaison Officers to develop partnerships with First Nations communities and their representatives, and to raise awareness among these communities about ART services.

While these developments are promising, they are in the very early stages of development. Their effectiveness in addressing the substantial barriers identified in our research will need to be monitored and evaluated over time. The success of these initiatives will largely depend on their practical implementation and the resources allocated to support them.

What needs to change?

Complex and interconnected barriers uniquely affect women in 4R Australia. These can include highly gendered roles and responsibilities, cultural factors, physical isolation and distance from services, significant technological limitations, and fundamental knowledge gaps regarding social security and appeal rights; each compounding the next.

For many women in 4R Australia, external review of social security decisions is inaccessible as the system fails to adequately account for the realities of 4R living, resulting in barriers that can effectively deny women their legal rights.

Many women in 4R areas don't know they can appeal

Women living in 4R communities often lack awareness of their right to appeal social security decisions. The complexity of government decision-making processes can be confusing and intimidating, with the review system adding another layer of complexity. To effectively appeal a decision to the ART, women must first recognise their issue as a legal matter, understand their right to review, know the appropriate channels for appeal, and be aware of critical procedural requirements such as time limits.

Where there is no physical Tribunal registry, women can struggle to understand and trust the appeals process. The ART is physically located only in capital cities, except in the Northern Territory there is no ART registry at all. Service providers state their belief that the lack of a physical presence of the ART in the Northern Territory contributes to low appeal rates in that jurisdiction. People don't see the Tribunal or know people who have been to the Tribunal. Service providers report that this issue may be particularly significant for First Nations women.

First Nations people predominantly are visual ... So, you are telling us to do something that's got no 3D approach to it, and it's not tangible. It lacks a level of understanding. So, you want to me to appeal. What does appeal mean? I peel the banana. What does that mean? What does appeal mean? And how do I know when this time is gone because I don't have a phone or a watch? And how do I know when the time's up and what do you mean I didn't do this document? What does that document mean? What does that look like?

— National New South Wales

Notably, when asked about their experience of the external review process, most non-legal service providers had not heard of it or of the AAT; the exception being EJA member centres who are specialist social security legal service providers. That means that community workers, who support women with social security problems, have been unable to assist their clients to access external review – because they did not know it was an option.

Similarly, none of the service providers interviewed had knowledge of or had engaged with any outreach officers from the AAT. These findings have significant implications for the new ART if it is to deliver on its Commitment to Accessibility and Inclusion.

Recommendation 95: That the Administrative Review Tribunal publish plain language resources about appeal rights and social security matters in multiple formats on their website and disseminate them to a wide range of community organisations.

Recommendation 96: That Services Australia improve Authorised Review Officer (ARO) decision letters to ensure the explanation about a person's right to external review is obvious to the reader and is accessible.

Recommendation 97: That the Administrative Review Tribunal improve outreach programs including education programs and community engagement forums.

Some women in 4R areas are fearful of seeking external review

Social security legal service providers working in 4R communities report that women avoid pursuing external appeals because they fear negative repercussions, even if those are unfounded, for example, losing their only source of income. The stakes are particularly high where social security income is their primary or sole source of income given the high cost of living and limited employment options in 4R areas. Financial vulnerability creates a situation where women feel they must choose between accepting an incorrect decision and risking their income security.

I think people are reluctant to [appeal] because they worry it will impact their payment ...

We've done a couple of [appeals] on behalf of Centrelink clients, but that's not necessarily an easy process either. Clients are generally quite reluctant to [appeal]. And some people have good knowledge of their rights, but knowing and standing up for them are two separate things.

– Very remote Northern Territory

Given higher rates of poverty and lack of community service supports, women in 4R communities may prioritise protecting what they have over seeking a hypothetical and seemingly unattainable legal right.



Women are also failing to appeal because they have a "don't rock the boat" mentality, accepting incorrect unfavourable decisions based on fear of repercussions if they "cause trouble" at Centrelink. That includes fear of:

- being labelled "difficult" by Services Australia staff
- an appeal negatively affecting future Services Australia decisions about them
- potential negative impressions being communicated to other government services
- the emotional toll of challenging authority figures

Further, pre-conceived notions about the formal nature of external appeal hearings can be a barrier to seeking review. Specialist social security legal centres are well-placed to provide legal advice about the external review process and support women through external review but lack adequate funding to publicise this free support and to provide advice and representation to all those who may need it.

Recommendations about the need for increased funding for social security legal services can be found in Chapter 6.

Geographic isolation and technology barriers prevent access to external review

Geographic distance presents a formidable barrier for women in 4R communities seeking access to external review mechanisms.

ART registries are often too far away to access in person, with travel inconvenient, time-consuming and expensive. More needs to be done to assure women that they do not have to travel to an in person hearing where that is not convenient.

They're almost always very surprised that the reviews are done by phone. They think they're in person as they know the AAT is located in the city ... Why would you appeal if you had to come eight hours to Sydney to do it? I think that needs to be made much more clear to people for accessibility reasons.

— Statewide New South Wales

Service providers see clients who have made the journey into a capital city to lodge documents in person and appear in subsequent hearings. Due to the distance, those women often need

to make logistical arrangements to ensure care for their families at home while they stay overnight, paying for travel and accommodation from personal budgets already under immense pressure. People living in capital cities do not have to grapple with comparable disruption and costs to exercise their rights to external review of a social security decision.

It might be like a five- or six-hour bus ride in. That means they have to get a hotel ... to attend the hearing.

— Statewide South Australia

Some women also struggle against limiting weather conditions. Northern Australia, including the Top End, Far North Queensland and the Kimberley, is particularly impacted by geographical isolation and monsoonal weather patterns. These areas have a unique climate and environment, specifically the wet and dry seasons, which impact access.

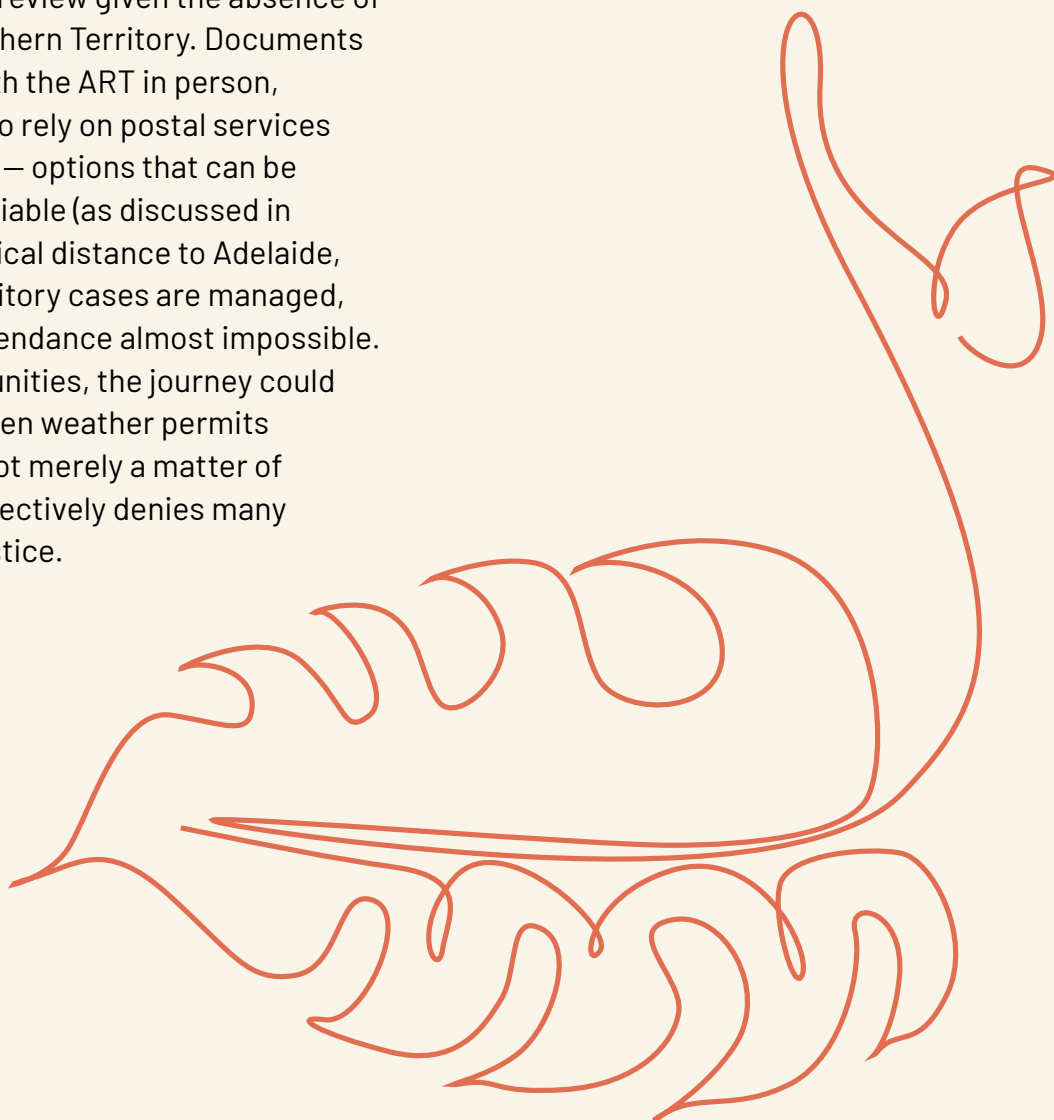
During the dry season it is four to six hours' drive. During wet season it's maybe unapproachable. We went in [to the capital city] in April, which is just at the end of wet season, and we drove through floodwaters. If we'd gone [earlier], we wouldn't have gotten through. So then [the trip requires] a plane ride.

— Very remote Northern Territory

Most clients we meet are unaware of their rights to review Centrelink decisions or apply to the ART to ensure their perspective is heard. The Northern Territory has by far the largest percentage of Aboriginal and Torres Strait Islander recipients of social security benefits and of those subject to compulsory income management. In many remote communities and homelands there is limited access to technology to facilitate people utilising their rights. Increased access to services of all kinds, including the ART, will assist people in their access to justice.

— Remote Northern Territory

Northern Territory women face an additional obstacle to external review given the absence of a registry in the Northern Territory. Documents cannot be lodged with the ART in person, with women forced to rely on postal services or digital technology — options that can be inaccessible or unreliable (as discussed in Chapter 3). The physical distance to Adelaide, where Northern Territory cases are managed, makes in-person attendance almost impossible. From remote communities, the journey could take several days when weather permits travel at all. This is not merely a matter of inconvenience; it effectively denies many women access to justice.



The need for an ART registry in the Northern Territory is pressing. EJA welcomes recent amendments to the *Administrative Review Tribunal Act 2024* (Cth), which require an ART registry and appointment of at least one registrar in each state and territory including the Northern Territory. The Federal Government has followed that commitment with an announcement to provide funding of \$3.6 million over four years to open an ART Registry in the Northern Territory. As of publication, these commitments are pending.

To establish a baseline understanding of external appeal uptake by women in 4R areas, EJA considered AAT case finalisation data from 2019-2023, obtained through a Freedom of Information request. Using postcode data, a pro-bono social data analyst calculated the percentage of all people whose AAT case was finalised by geographic remoteness indicator. The majority, 66 per cent, were living in a major city, while 32 per cent were living in a 4R area (with the geographic location of 1.5 per cent of cases unknown). That data shows that a sizable portion, approximately one third, of Tribunal finalisations involve people living in 4R areas.

Table 1: AAT appeals by geographic region 2019-20235

Remoteness	Count	Percentage
Major city	36,030	66.4
Inner regional	11,094	20.4
Outer regional	5,280	9.7
Remove	697	1.3
Very remote	328	0.6
Uncoded	835	1.5
Total	54,264	100%

Unfortunately, AAT case finalisation data is not disaggregated by gender. Other data limitations include that data:

- is not disaggregated by remoteness, cultural background, disability or age, preventing identification of issues and intersectional analysis.
- does not indicate mode of hearing (in person or remote), accommodations made for 4R participants, support services accessed, or barriers encountered during the process, offering limited insight into process.
- does not distinguish unique applicants, noting a single social security recipient may have multiple finalisations of appeals about different payment types, sequential appeals over time, or appeals of different decisions about the same payment.
- captures only cases that reached finalisation, excluding matters that were withdrawn, discontinued, or in progress at the time of data collection.
- reflects an atypical timeframe (2019-2023) which includes the COVID-19 pandemic period that likely influenced appeal patterns.

These data limitations highlight the need for more comprehensive data collection about appeals and access barriers, better tracking of application attempts against finalisations, improved demographic data collection, and research into barriers preventing people from initiating appeals.

Recommendation 98: That the Administrative Review Tribunal establish an independent external Advisory Council to provide advice on matters of accessibility and inclusion including regional, rural, remote and very remote participants, people experiencing family and domestic violence, First Nations people and people with disabilities.

Recommendation 99: That the Administrative Review Tribunal publish practice directions for social security matters, providing guidance on how these matters should be heard; ensuring that first review of Centrelink decisions remains informal, accessible, and non-adversarial.

Recommendation 100: That the Administrative Review Tribunal implement comprehensive data collection on access barriers and conduct regular reviews of geographic access patterns.

Recommendation 101: That the Administrative Review Tribunal implement a comprehensive consultation process with people living in regional, rural, remote and very remote Australia when designing, modifying, or implementing accessibility policies and procedures. This consultation should explicitly include consideration of preferences for in-person versus remote service delivery.

Recommendation 102: That the Administrative Review Tribunal establish a physical registry in the Northern Territory in accordance with recent amendments to the *Administrative Review Tribunal Act 2024* (Cth).

Recommendation 103: Pending the establishment of a permanent registry, that the Administrative Review Tribunal deliver registry services through the Supreme Court of Australia registry offices in the Northern Territory in Darwin and Alice Springs, as is currently provided at the Norfolk Island Supreme Court registry office.



Remote service options such as phone and video conferencing are not always accessible or preferred

Although some women prefer remote service delivery through phone or video conferencing, others report a strong preference for in-person tribunal services, especially those who view their social security matters as extremely personal or emotional. Women who are particularly vulnerable can struggle to engage with remote options which prove an inadequate substitute for in-person tribunal registries and services.

She said, "I want to be in the AAT, I want to sit in that room."

— Statewide South Australia

The limitations of remote services are particularly acute in 4R areas, where technological infrastructure is often inadequate or non-existent. As outlined in Chapter 3, large portions of 4R Australia are without reliable digital network coverage, infrastructure and literacy.

When remote servicing is the only option, women may go to extraordinary lengths to participate, such as driving hours to find adequate phone reception or conducting sensitive conversations from vehicles. Legal assistance and community services attempt to bridge these gaps by providing in-home services where possible, but resource constraints limit their reach.

Social security legal services firmly maintain that in-person servicing is an important aspect of assisting women in 4R communities to access external review mechanisms.

We have gone out to be with people in their homes to conduct conferences and the hearings and things like that. If it was somebody regional or rural, that would take a lot of planning, but it might be something that somebody needs.

— Statewide South Australia

I know [social security legal services], they can only handle representing people with AAT on a handful of cases every year... it's all stretched. That's always going to be problematic. So, people are going to be left fending for themselves and if they can get help through financial counsellors, great. So, getting your hands on whatever info you can is really important.

— Rural Victoria

Accessibility requires service design based on user needs and preferences. Both remote and in-person options should be genuinely available and practically accessible. Social security legal services report accessibility issues when women in 4R areas seek to lodge applications and documents, communicate with the Tribunal, and seek legal assistance with their matters. Remote servicing options are flawed – they do not account for women who have multiple accessibility needs such as living in a 4R location and experiencing a physical disability.

Case study – Rumi

Rumi is a young woman living with multiple disabilities in regional Australia. She has a significant physical disability that confines her to her home, and she also manages an ongoing mental health condition.

In late 2023, Rumi applied for Disability Support Pension (DSP). After her application was rejected, she spoke to Services Australia staff who referred the decision for review by an Authorised Review Officer (ARO). When Rumi got her decision, she saw that she had been unsuccessful but could seek another review through the Administrative Appeals Tribunal (AAT), which she did. Rumi then didn't hear anything and wasn't sure what to do.

Almost a year after lodging her AAT application, a community service told Rumi that she could get free advice over the phone from a community legal centre (an EJA member centre) located more than 100 kilometres away. After contacting the centre, it became apparent that Rumi was unable to understand the AAT process and was extremely confused about the status of her case.

Rumi said she had lots of paperwork but she couldn't send it to the lawyer. Rumi couldn't work out how to do so because she didn't have a computer and her physical disability prevented her leaving her home.

The EJA member centre advised her that the AAT was now known as the Administrative Review Tribunal (ART). The EJA member centre asked Rumi to contact the ART to tell them that she was seeking legal advice and to authorise the ART to provide all relevant documents to her lawyer. Rumi did that and told her lawyer the appeal number the ART had given her so the lawyer could request the documents.

The EJA member centre contacted the ART but Tribunal staff refused to provide any information unless Rumi physically signed and provided to the tribunal an ART form appointing a legal representative. Rumi was unable to do so for the same reasons she couldn't send her paperwork to the EJA member centre. The Tribunal did not offer an alternative disability access arrangement.

The EJA member centre spent more than a week going back and forth with Tribunal registry staff attempting to obtain basic information about Rumi's matter. Documents were finally provided, in stages over several days, only after the EJA member centre escalated the matter to a Registry manager.

Rumi's documents revealed two things. Firstly, her matter had progressed without her knowledge. Secondly, the reason for Rumi's DSP rejection was that she had not completed a Program of Support (POS) requiring her to undertake activities to prepare and look for work for at least 18 months. Ironically, if that had been explained to Rumi clearly when her DSP claim was initially rejected, she would have either completed a POS by this point or been exited from her POS if it could not assist her to gain employment. Either way, she would now be receiving DSP. As it stands, Rumi must now spend an additional 18 months before qualifying for DSP.

Recommendation 104: That the Administrative Review Tribunal implement policies and procedures that specifically address accessibility challenges, incorporating realistic assessments of technological capabilities and community needs in regional, rural, remote and very remote areas.

Services Australia and the Department of Social Services' engagement with external review processes prevent access to effective review

Access to effective and meaningful external review processes is a cornerstone of administrative justice in the social security system. Some social security legal services report that the effectiveness of external review mechanisms is undermined by Services Australia's and the Department of Social Services' (DSS) conduct and resource allocation, particularly lack of effort to settle cases before they go to hearing and agencies not learning from Tribunal outcomes.

We get so many matters going to AAT unnecessarily because there is no way to intervene earlier [before the hearing] and provide that information and resolve it. It wastes everyone's time and money, and the client is suffering more, and they have to go through that whole process, pay for evidence and other things.

— Rural Queensland

Other legal services report their experiences of disproportionate allocation of resources by DSS and Services Australia in external review matters. This becomes particularly apparent in debt matters where services estimate DSS's spending on the external review process far outweighs the value of alleged debts at issue. Services reported this was also perceived in the consistent outsourcing of legal representation to large corporate law firms.

The thing that astonishes me is the amount of money Centrelink spends on say, recovering a debt – compared to the amount of money the debt is worth. I remember one [hearing] where [Services Australia] had Junior Counsel and Senior Counsel in the AAT and I'm thinking, why are they spending all this money on Counsel and a hearing and everything else? What if you just guaranteed people a minimum sort of liveable wage, just some minimum level of payment income that they don't have to fight for? Then I think it would be a fairer system.

— Remote Queensland

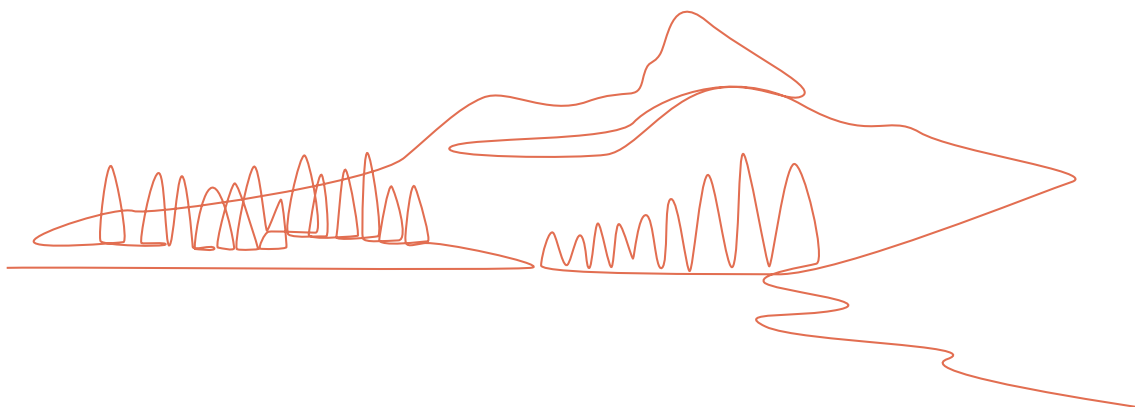


A Tribunal decision is independent feedback for Services Australia and DSS on how it had applied its legislation to a factual situation, when the agencies made their original decision. This means that the agencies should be learning from the outcomes of this external review process. Instead, social security legal services regularly deal with matters which have been escalated to the Tribunal despite external appeal decisions in similar cases having been made in clients' favour. Such matters should have been resolved at the internal review level if the agencies had learned from previous Tribunal decisions.

Recent developments demonstrate the agency's ongoing resistance to implement earlier Tribunal decisions in ongoing internal decision making. In October 2024, DSS announced that it would be progressing reviews of debts affected by income apportionment in accordance with its interpretation of the law, which was not in accordance with the Tribunal's recent decision on this issue, known as the FTXB decision.⁴² In consideration of that course of action, the Commonwealth Ombudsman expressed doubt on the legal certainty of DSS' current debt recalculation method.⁴³ This signals room for improvement in the way Services Australia and DSS engage with external review mechanisms.

The Robodebt Royal Commission (RRC) revealed that systemic failures in the way Services Australia and DSS engaged with external merits review was one of the reasons that the Robodebt scheme was able to continue for so long, causing distress and hardship to hundreds of thousands of people. As explained in the RRC's final report at pages 555-556,

... there was no system or policy in place to allow DHS or DSS to systematically review AAT decisions; monitor statements of legal principle emerging from AAT decisions; consider how any guidance the AAT gave could improve decision making; raise significant cases with senior officers in DHS or DSS; or generally exchange information about AAT decisions with each other. Such a system would have been valuable. It would have enabled an approach to appeals which could have resolved the issues of law and policy which the Robodebt decisions raised and, at the least, had the beneficial effect of improving the quality and consistency of decisions made by DHS officers.



42 [FTXB; Secretary, Department of Social Services and \(Social services second review\)\[2024\] AATA 3021\(28 August 2024\)](#)

43 See the Commonwealth Ombudsman's 2024 report [Learning from merits review: Best practice principles for agency engagement with merits review](#).

Despite the RRC providing clear recommendations about how Services Australia and DSS should engage with the Tribunal and its decisions, services providers report ongoing issues.

Services Australia and DSS' problematic engagement with external review processes is a missed opportunity to facilitate early resolution. Their current engagement with external review can create unnecessary costs for all parties including persons affected, support services, legal representatives, the Tribunal, and government agencies. Critically, it also prolongs hardship and distress for vulnerable people who must wait longer for resolution while gathering additional evidence and attending Tribunal hearings, which is especially challenging for many women in 4R areas.

As Commonwealth government agencies, Services Australia and DSS must comply with legal and professional obligations when they are party to external review proceedings. This includes the Commonwealth's duty to act as a model litigant. This duty requires them to deal with claims and litigation promptly, act in accordance with legal principle and practice, not pursue appeals without reasonable prospect of success, avoid litigation where possible through use of alternative dispute resolution, and – where litigation is unavoidable – minimise cost and disadvantage to the other party.⁴⁴ This obligation extends to Services Australia and DSS making decisions in consideration of the beneficial nature of social security law against the broadened principles of social security administration.

According to the Commonwealth Ombudsman, Services Australia has recently updated its internal training packages for legal staff on core duties and obligations for government lawyers and provides continuing legal education to its staff on similar topics.⁴⁵ These procedures for participating in Tribunal appeals include consideration of alternative dispute resolution processes. These are promising developments.



⁴⁴ Explained in detail at Legal Services Directions 2017(Cth) at Appendix B.

⁴⁵ See the Commonwealth Ombudsman's 2024 report [Learning from merits review: Best practice principles for agency engagement with merits review](#).

Unlike other government agencies which regularly engage with external review processes in the ART, Services Australia and DSS do not publish their model litigant guidelines. The National Disability Insurance Agency and the Australian Tax Office have accessible, plain English model litigant guidelines on their websites, including important information about lodging a complaint if the agency fails to adhere to their guidelines.⁴⁶

Recommendation 105: That the Department of Social Services and Services Australia develop and publish a formalised protocol to support continuous improvement arising from Tribunal outcomes, including examples of best practice, and share learnings more effectively within the agencies. This statement should be accompanied by a list of concrete steps for how the agencies will give effect to that commitment.

Recommendation 106: That the Department of Social Services and Services Australia improve training for legal officers about core duties and responsibilities including model litigant obligations, specific guidance on early resolution and use of alternative dispute resolution.

Recommendation 107: That the Department of Social Services and Services Australia incorporate the new referral and escalation powers available under the ART reforms (such as the Guidance and Appeals Panel) into their policies and procedures. This should include guidance to staff on the different options available for the treatment of potential test cases in the Tribunal.

Recommendation 108: That the Department of Social Services and Services Australia publish and disseminate its model litigant guidelines, similar to those published by the National Disability Insurance Agency and the Australian Tax Office, including a complaints process.

Tribunal decisions often fail to account for the realities of 4R living

Even when women successfully navigate barriers to external review, the Tribunal's decision-making process often fails to adequately consider the unique challenges of living in 4R Australia.

[The AAT makes] poor decisions in relation to understanding poverty, disadvantage, financial hardship and cost of living in regional and remote areas of Australia, and for Aboriginal clients. [It makes] poor decisions in relation to understanding that the concept of care in our clients' understanding does not accord with the Anglo-Western definition of care and parenting in the legislation.

— Remote Northern Territory

⁴⁶ See the [NDIA model litigant guidelines](#) and the [ATO model litigant guidelines](#).

Service providers maintain that AAT members did not sufficiently understand key factors of living in non-metropolitan areas, including:

- Higher costs of living
- Limited availability of services and treatment options
- Transportation challenges and distance barriers
- Cultural factors, particularly for First Nations women
- Compounding impact of multiple disadvantages

Social security legal service providers also report that when considering evidence, AAT members dismissed challenges the women had experienced resulting from their location in a 4R area. That includes AAT members finding that such issues are "too common to be considered special" against "special circumstances" debt waiver provisions, despite their significant impact on the events that led to the debt.

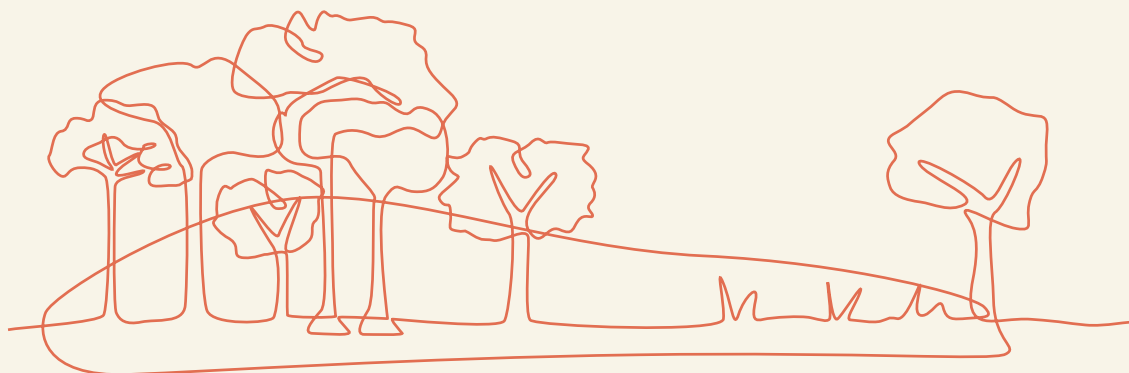
While merit review is case-by-case and needs to respond to the specific facts of the case, service providers reported concerning variations in decision-making.

AAT decisions [vary] from case to case and perhaps from Tribunal member to Tribunal member. Decisions may appear to be consistent on paper but it is fair to say there are some inconsistencies. Some decisions focus largely on applying the law strictly speaking, and focus less on the client's plight and special circumstances than they should.

— Metropolitan Western Australia

Tribunal decisions do not take a consistent approach to relevant 4R issues

To better understand the treatment of 4R issues within AAT decisions, EJA partnered with the University of Melbourne's Executive Government Research Lab to undertake a review of AAT General Division decisions. That review considered decisions made between 2002 and 2024 involving women living in 4R areas. The review identified 2,087 AAT decisions relating to income support payments, where terms associated with living in 4R area were mentioned



Notable trends included:

- Consideration of 4R factors was the exception, not the rule
- The challenges of living in 4R areas were not considered unique when determining whether there were special circumstances for debt waiver
- Most decisions ignored accessibility issues, including the need to travel long distances for treatment, the need to travel long distances to obtain medical evidence, lack of employment opportunities, social isolation, challenging work conditions and requirements, and the absence of any post office to post hardcopy evidence
- Difficulties understanding and hearing evidence and proceedings during telephone hearings was not considered relevant

Case study - Onody and Secretary, Department of Social Services [2018] AATA 4990⁴⁷

The Applicant, Ms Onody, and her partner managed a motel in Robe, a small town of 1,300 people located more than 300 kilometres from Adelaide. Their business required them to work around the clock managing a 17-room motel with no days off. Ms Onody received Family Tax Benefit (FTB) Part A and B. In order to receive the FTB supplement payments, Ms Onody was required to lodge her tax returns by a deadline. The Respondent, which at the time was the Department of Human Services, decided her tax returns were not lodged by the deadline and decided not to grant her an extension of time for lodging her tax returns. Ms Onody appealed to an Authorised Review Officer and then to the AAT.

Ms Onody had only recently transitioned to self-employment and found her tax affairs too complicated to do herself. They required professional accounting services that weren't available in Robe. Given the absence of qualified local accountants, Ms Onody engaged an Adelaide-based accountant. This arrangement required Ms Onody to make a seven-hour round trip to Adelaide to submit financial paperwork for tax returns. Despite timely submission of her documents, the tax returns weren't completed by the deadline.

When Ms Onody contacted Centrelink two days before the deadline, she was advised to change accountants immediately and claimed she was told 'that the only valid excuse for late lodgement would be if her house burnt down along with all her tax records'. Ms Onody stated in evidence that even if she had been able to get away from the motel immediately following the phone call to make the seven-hour round trip to Adelaide to collect the returns, she would not have been able to find an accountant able to complete the returns within two days.

The Tribunal, while acknowledging these challenges, determined they didn't constitute "special circumstances" under the legislation. The Tribunal reasoned that distance from professional services is a common reality of 4R living. The complexity of business tax returns was also considered a normal aspect of self-employment rather than an exceptional circumstance.

Notably, the Tribunal distinguished this case from previous "perfect storm" scenarios considered in Willersdorf that involved multiple unexpected events such as family deaths or staff terminations. The Tribunal concluded that while Ms Onody's circumstances were challenging, they represented the ordinary difficulties faced by rural business operators rather than the exceptional circumstances required to justify late lodgement.

As the ART develops its practice directions, policies and procedures, it is important to reflect on weaknesses in previous AAT frameworks. AAT documents obtained through Freedom of Information request reveal room for improvement in the development of ART guidelines. For example:

- The AAT Social Services and Child Support Division Member Handbook lacked specific guidance for handling cases with participants in 4R locations.
- AAT policy on listing and giving notice of hearings mentioned participants living in remote communities, but only to acknowledge that mail may take longer to get to them.
- AAT policy on adjournment of hearings did not include considerations for people living in 4R areas, notably around the exercise of the discretion to reschedule, dismiss, or review based on documents alone.

Recommendation 109: That the Administrative Review Tribunal comprehensively review and update Member training and guidance materials to ensure proper consideration of regional, rural, remote and very remote living in decision-making, including 'bench' books, handbooks and policies in consultation with regional, rural, remote and very remote communities.

Access to social security legal assistance

People are literally crying on the phone to us for help ... There are whole families in western New South Wales surviving on just one Centrelink payment because carers have given up trying to get Carers Payment, young people have given up trying to get Youth Allowance, people with disability have given up trying to get Disability Support Pension.

These people are entitled to Centrelink payments, but they have given up because the social security system is too difficult to navigate ... It's just so disappointing that the Federal Government has not invested more in social security advocacy services that are seeking to make a difference to the levels of poverty experienced by people in New South Wales.

- *Statewide New South Wales*



Key findings

41. There is a critical lack of funding for social security legal assistance across rural, regional, remote and very remote (4R) areas, with services unable to meet demand for help.
42. The higher cost of service delivery in 4R areas is not adequately recognised and addressed in funding models, often forcing services to prioritise crisis support over baseline and preventative legal assistance.
43. Insufficient outreach capacity significantly impacts the accessibility of social security legal assistance in 4R areas, with many communities unable to access legal assistance at all due to insufficient funding to services for travel and remote service delivery.
44. Current disaster response funding models are reactive, with no ongoing funding to undertake capacity-building and proactive work. This lack of permanent core disaster response funding undermines services' ability to develop and maintain essential expertise and community relationships, leaving them under-resourced to handle increasing frequency and intensity of natural disasters.
45. Community legal centres, family violence prevention legal services, and Aboriginal and Torres Strait Islander legal services all face critical funding shortfalls that limit their capacity to provide services, particularly in 4R areas.
46. The complexity of social security law combined with inadequate remuneration, housing shortages, and lack of professional support networks creates substantial barriers to building workforce capacity in 4R areas, while clients increasingly present with multiple, interconnected legal issues requiring significant expertise.

How does social security legal assistance work?

Social security legal assistance in Australia primarily operates through community legal centres and other community organisations, particularly in rural, regional, remote and very remote (4R) areas. Aboriginal community-controlled organisations additionally provide culturally appropriate services, while Legal Aid commissions offer widely varied levels of service between states and territories.

A small number of legal services specialise in social security advice and representation, either working only in the area of social security or running a social security practice consisting of specialist staff within their generalist or multidisciplinary centre. They are all Economic Justice Australia (EJA) member centres.

The funding structure for social security legal assistance has changed significantly over time. Historically, social security legal assistance received dedicated funding through a specialist sub-program within the Commonwealth Legal Services Program. Today, social security funding has merged into general community legal centre funding without specific designation, which makes it difficult to track and evaluate its adequacy. This effectively obfuscates the lack of funding and its consequences.

The higher costs of service delivery in 4R areas are not reflected in funding arrangements. This produces large discrepancies in the accessibility of legal assistance across geographic areas. Gaps in other support services in 4R areas place additional pressure on legal services to fill both legal and non-legal roles. This has created a system where social security legal services struggle to meet demand in those exact areas where need can be greater, more complex and service delivery most challenging. Many community service workers support clients to troubleshoot social security issues but as soon as it becomes complex or obviously a legal issue (for example, requiring engagement with a Tribunal), they refer to social security legal services.

There is no comprehensive measurement of unmet legal need in 4R areas. The most recent attempts at measurement, referenced in the *Independent Review of the National Legal Assistance Partnership Final Report* (Recommendation 1), noted that best attempts resulted in an incomplete record given the enormous complexity of the task.⁴⁸ However, it is widely understood that the impact of unmet legal need is greatest in areas of the Australian population experiencing high levels of disadvantage.

What is working well?

EJA's research process included lengthy interviews with many social security lawyers and advocates. A significant majority of these service providers show dedication to their clients by providing assistance beyond their funded scope when no alternative services are available. Particular efforts to assist clients with complex needs and multiple legal issues are evident where other support services are limited or non-existent, especially in 4R areas. Strong relationships with other community organisations, particularly women's services, are vital for extending social security legal assistance to women in vulnerable circumstances.



This has created a system where social security legal services struggle to meet demand in those exact areas where need can be greater, more complex and service delivery most challenging.

48 Some reports that attempt to measure unmet legal need across Australia. [Attorney-General's Department \(2024\) Independent review of the National Legal Assistance Partnership 2020-25 Final Report](#); [Productivity Commission \(2014\) Access to justice arrangements – Inquiry report](#); [Law Council of Australia \(2018\) The Justice Project – Final report](#).

Case study – Sharon

Services Australia claimed that Sharon, who lives in a remote community, owed more than \$10,000 in Family Tax Benefit (FTB) debt. A local women's centre, recognising the severity of her situation, connected Sharon with an EJA member centre.

Services Australia told Sharon her debts had arisen because of her income and her child being out of her care. When Sharon spoke to a lawyer at the EJA member centre, they advised that neither of these reasons could have resulted in her debts, because Sharon was single, her child had been in her care during the entire period, she had lodged tax returns where required, and had advised Centrelink when she wasn't required to lodge her tax returns.

Sharon's lawyer contacted Services Australia on Sharon's behalf to request an explanation of the debt, but was told there was no information on the system about why the debts had been raised and that it had occurred as part of the annual FTB balancing process which was automatic and therefore correct.

Sharon's lawyer requested a formal Authorised Review Officer (ARO) review of the debts. Based on Sharon's instructions, none of the usual reasons a person may have a debt applied. Her lawyer assessed that she had been entitled to the maximum rate of FTB during the entire period of the debts.

Months passed, with Sharon's lawyer persistently following up on the review's progress. 18 months after Sharon's lawyer's initial contact, the Services Australia ARO who had been allocated the matter contacted Sharon's lawyer and stated they thought the debts might relate to child support issues. Sharon's lawyer advised that Sharon had not been required to take child support action as her child's father was incarcerated during the debt period for family and domestic violence perpetrated against Sharon, which meant Sharon should have been exempt from the requirement to seek child support.

The next time Sharon's lawyer spoke with Services Australia, the ARO said they thought there was incorrect information recorded in the system and that there may be no debts but that they were trying to get a technical expert to fix the glitch. In early June 2023, the ARO informed Sharon that the amount she had paid towards the 'debt' would be repaid to her. The ARO was not able to explain how the incorrect information ended up in the system and was used by the automatic balancing process to raise debts.

Sharon's lawyer spent a significant amount of time over a significant period advocating for Sharon's incorrectly raised debts to be set aside. If not for their dedication and expertise, it is likely that Sharon would have been forced to repay more than \$10,000 which she did not owe.

Importantly, the referral was made based on the relationship the EJA member centre had developed with the women's centre during recent outreach to Sharon's remote community. Since Sharon's matter, the centre has assisted a number of women with incorrect FTB balance debts and engaged in systematic advocacy with Services Australia on this matter.

Throughout this research, it was apparent that most legal services are leading the way in client-centric approaches to lawyering, with many implementing a 'no wrong door' policy to ensure clients receive some form of assistance when they have no one else to turn to. These services show flexibility and innovation in their service delivery, adapting to meet local community needs despite resource constraints.

Overwhelmingly, the advocates interviewed for this project demonstrated professionalism and a commitment to justice which has resulted in strong community relationships. They are often considered stalwarts in their organisations and trusted figures in their communities. Whether developing local partnerships, creating online education resources, maintaining innovative outreach programs, running dedicated hotlines, or securing innovative funding, they consistently put their communities first.

Social security legal services are held in overall high regard and operate as hubs for community workers seeking answers to social security legal questions. For example, Social Security Rights Victoria's (SSRV) dedicated phone line for community workers, and Welfare Rights Centre NSW's 'community of practice' for disability workers. When adequately resourced, community workers directly support vulnerable people with wraparound support while their legal issue is remedied by social security expert assistance.

Case study – Putri

Putri, a woman living with a disability in regional Australia, had gone through a protracted process trying to get onto Disability Support Pension (DSP). After three years, Putri was finally successful, but not from the date of her original claim despite being eligible all along.

Putri's disability advocate contacted an EJA member centre through their Worker Help Line. The advocate explained that Putri wanted to pursue the three years of back payments she believed she was entitled to. Supported by her advocate, Putri had lodged an appeal with the Administrative Appeals Tribunal (AAT).

The EJA member centre provided advice to Putri's disability advocate about the prospects of challenging the initial DSP rejection and the time limits applicable to backpay claims, the latter relating to a technical legal issue in Putri's case. The EJA member centre did not have sufficient resources to represent Putri at her AAT hearing. Using the EJA member centre's submissions, Putri and her advocate made their argument to the AAT. The AAT sent Putri's matter back to Services Australia for reassessment. Putri and her disability advocate then sought further advice from the EJA member centre regarding the decision and merit in seeking further review.

The EJA member centre advised Putri and her advocate about Putri's legal options and recommended that she provide medical evidence to Services Australia showing she was eligible for DSP three years ago. Putri was able to do so, providing the historical medical reports to support her claim.

Based on these documents, Services Australia decided Putri was eligible for DSP from her initial claim, and agreed with the EJA member centre's advice that Putri was not out of time in her request for backpay. Putri was paid \$20,000 in back payments.

The EJA member centre worked closely with Putri's disability advocate throughout her appeal, providing support and assistance to the advocate and legal advice to Putri. The disability advocate supported Putri by accompanying her to the hearing, communicating with Services Australia, and assisting her to locate and provide supporting documents. The consistent, wraparound support was fundamental to Putri's success.

Independent research commissioned by EJA (previously the National Social Security Rights Network) in 2014 found that legal services provided by EJA member centres made a significant, and in some cases vital, difference to their clients' lives.⁴⁹ Once clients were able to obtain their social security entitlements, most were able to reconnect with family and friends. In some cases, people who had been cut off from their children were able to see them again. Many clients returned to work, study, or volunteering. These findings are reiterated in the ongoing evaluation of specialist social security legal assistance provided by EJA member centres, which shows that their legal advice and assistance to thousands of people each year routinely results in social security issues being resolved, often to life-changing effect.



49 Susan Bell research, How does the National Welfare Rights Network add value to clients?, Independent research with clients, December 2014

What needs to change?

Chronic underfunding of social security legal services in 4R areas

Social security legal assistance faces chronic underfunding. Legal services spend significant time and resources juggling multiple funding sources just to maintain basic operations. Many services piece together their budgets from a combination of state and federal grants, one-off project funding, philanthropic grants and disaster response allocations. This creates a complex administrative burden as staff must track and acquit multiple grants with different reporting requirements and timelines. The constant need to identify and apply for new funding sources diverts time and resources, which are already scarce, away from essential social security legal assistance.

The situation has worsened since social security legal assistance lost its quarantined funding status within the Commonwealth Legal Services Program. Robodebt⁵⁰ and a second round of unlawful income apportionment leading to debts⁵¹ have impacted hundreds of thousands of social security recipients.

Social security legal services routinely assist their clients in accessing their legal entitlements, yet the 2024 National Access to Justice Partnership failed to allocate a specialist funding stream for stable, adequate baseline funding for social security legal assistance. That lands heavily on women in 4R areas.

The constant need to identify and apply for new funding sources diverts time and resources, which are already scarce, away from essential social security legal assistance.

We know that there is a huge unmet need for social security legal assistance in rural and remote regions of Western Australia and that many people living in those regions are not comfortable talking to services unless they are face-to-face. Our funding does not include any money to travel to remote locations to provide a service.

We address this where we can by applying for ad hoc grants, but this takes time away from service delivery and we can't plan service delivery into the future. When we do travel to remote areas, we often meet with women who have experienced family and domestic violence. We help them to get onto appropriate payments [and] apply for exemptions from having to claim child support due to family and domestic violence ... We have also been able to help women get large debts reassessed or set aside. We are well-aware of how many communities we cannot visit at all.

— Statewide Western Australia

50 For more information about the Robodebt Scheme, see the [Royal Commission into the Robodebt Scheme final report](#).

51 For more information of recent unlawful income apportionment schemes, see the [Commonwealth Ombudsman December 2023 report](#).

Social security legal services report that the impacts of chronic underfunding have been exacerbated by increasing demand for legal assistance, as the effectiveness of Services Australia has been undermined by budget cuts, reduced staffing and training, problematic IT systems, and the impacts of COVID-19 and the Robodebt scheme. People typically present to social security legal services with multiple, interconnected legal issues requiring significant time and expertise. Their legal issues are often complicated by difficult personal circumstances such as mental health issues, family violence, and disabilities that require wraparound support.

It's increasing significantly, in terms of the complexities of [social security legal issues] ... Everyone that's coming through the door ... Everything's more difficult. People are coming in with more problems ... You start off with one problem ... but you also get more complexities. We're also seeing increased mental health [issues], which makes it difficult as well.

— Remote Tasmania

While social security legal services strive to provide support, many people cannot get through on their advice lines or are turned away due to resource constraints. For example, EJA member centre Welfare Rights Centre NSW was unable to answer approximately 59 per cent of incoming calls to their service between July 2023 and September 2024. This problem increased in the October–December quarter of 2024, when the percentage of unanswered calls rose to 66 per cent. Unique caller data shows that during that quarter, 423 people could not get through, including those who made multiple attempts.

This situation is particularly concerning given there are no private sector alternatives for legal advice or assistance. Further, access to social security legal assistance from Legal Aid is limited and varies widely around the country. Where possible, Legal Aid commissions provide a valuable service, also noting the significant casework and public interest contribution of Victoria Legal Aid on Robodebt and both Victoria Legal Aid and Legal Aid NSW on recent income apportionment matters. It is, however, rare for Legal Aid to assist with an internal review by an Authorised Review Officer (ARO) and, while available for some Administrative Review Tribunal (ART) appeals in some jurisdictions, Legal Aid is completely unavailable in others.

Social security legal services often work beyond their funded capacity and “plug gaps” to meet client needs, working with allied community workers to support clients. This is especially apparent in 4R areas where face-to-face government services such as Services Australia are limited.

When people come through the door, they might say, “I need help with a family violence situation”. So, then the social security payment issue has to fall down [the list of priorities] ... So then again, people are stuck in the same cycle of poverty and unable to access things ... It's always dealing with the crisis first. The problem is that it's crisis after crisis.

— Remote Northern Territory

The 4Rs Community Legal Network, a network of legal services based across 4R Australia, noted in their submission to the Independent Review of the National Legal Assistance Partnership that the consequences of unmet legal need on an individual can be dire. As the 4Rs Community Legal Network explains:

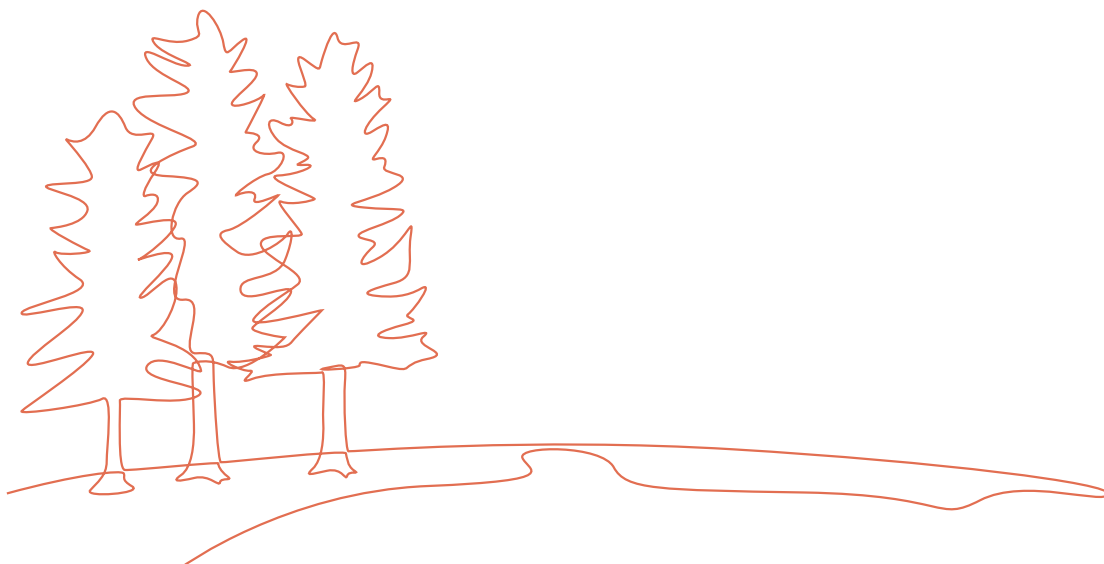
In many locations ... the nature and effect of unmet legal needs in the 4Rs are at a humanitarian level and are deepening hardship and poverty. Unmet legal needs contribute to women, children and older people being unsafe ... homelessness, child protection interventions, social security problems, disengagement, increased anxiety and poorer health profiles.

The Robodebt Royal Commission recommended the Government consider funding for Legal Aid commissions and community legal centres in recognition of the importance of the public interest role they play, as exemplified in their work during the Robodebt Scheme. This includes EJA member centres.

Recommendation 110: That the Federal Government increase funding to EJA member centres, which provide specialist social security legal assistance and programs, through a designated social security funding stream under the National Access to Justice Partnership in the amount of an additional \$5 million per year on top of baseline funding over the life of the agreement.

Recommendation 111: That the Federal Government allocate ongoing additional funding through the Department of Social Services to support EJA's core functions, with an emphasis on capacity to provide timely and expert analysis to inform Parliament and key departments' considerations of social security law and policy.

Recommendation 112: That the Federal Government fund EJA member centres to provide legal advice to clients pre-Administrative Review Tribunal hearing, and establish a system where unrepresented clients can access a duty lawyer.



Lack of sustainable natural disaster funding for social security legal services

The increasing frequency and intensity of natural disasters has exposed critical gaps in social security legal assistance funding.

The relationship between disasters and social security legal issues extends far beyond emergency payments. During and immediately after disasters, social security systems face intense pressure to rapidly process claims, sometimes operating with reduced capacity and damaged infrastructure. These events create long-term increased demand across multiple locations, compounded by issues arising from dislocation, trauma, and mental and physical health challenges. Disasters also create new cohorts of vulnerable people who have never previously interacted with the social security system, leading to ongoing legal needs that persist months and sometimes years after the disaster.

Social security legal services have demonstrated their crucial disaster response role through their work supporting people affected by the 2019/20 Victorian 'Black Summer' bushfires, the 2022 NSW Northern Rivers floods, and the 2022/23 Ex-Tropical Cyclone Ellie in the Kimberley region of Western Australia. Post-disaster funding enables social security legal services to provide essential outreach legal assistance to affected communities, often presenting a rare opportunity for metropolitan-based centres to provide face-to-face services for 4R communities. This engagement builds community resilience and establishes meaningful relationships that continue well beyond disaster-related matters.

It's always there [the risk of a natural disaster]. And I reckon the [disaster-impacted] communities that we've worked heavily in [providing legal education], they're going to be just so ready.

— Statewide South Australia

Importantly, social security legal services' efforts have extended beyond casework to deliver long-term social security policy changes, which have improved the social security systems' natural disaster response. For example, advocacy by EJA and SSRV, drawing from SSRV's casework following Victoria's catastrophic 'Black Summer' bushfires, has resulted in significant changes. This includes 'member of a couple' rules that now account for the lack of available housing post-natural disaster, and consideration of a natural disaster as a 'special circumstance' in debt waiver matters. EJA is also working with Welfare Rights Centre NSW to ensure their learnings from the Northern Rivers floods are reflected in social security policy. That includes our ask to ensure long rebuild and government buy-back scheme timelines can be taken into account when assessing 'principal place of residence' asset limits, so that people are not cut off payment while they still have nowhere permanent to live.

Case study – Nadine

In the aftermath of severe flooding, Nadine faced significant property damage. Her home sustained substantial damage, and she lost several outbuildings including sheds, extensive fencing, and a chicken coop with her entire flock. Despite the severity of the damage, Nadine's property fell outside the officially declared disaster zones used by Services Australia for disaster-related payments and exemptions.

Nadine's mutual obligation requirements to look for work continued uninterrupted despite the flooding crisis posing significant challenges. Rather than receiving an automatic exemption, she had to repeatedly contact her employment service provider to explain how the disaster impacted her ability to participate in programs or seek employment.

Nadine's insurance covered alternative accommodation, and she opted for a caravan placed in her backyard to oversee the extensive repair process. The reconstruction faced numerous delays due to material shortages and limited contractor availability. The repair process required Nadine's constant presence to coordinate with a succession of tradespeople: electricians, plasterers, floorboard installation crews, cabinet makers, and painters who all needed access and supervision at different stages of the restoration.

This constant need to be available for contractors meant Nadine frequently had to contact her employment service provider to request exemptions from her mutual obligations. Each request required her to provide evidence justifying the exemption to maintain her payments.

Nadine sought assistance from an EJA member centre. She wanted a longer exemption from her mutual obligations so she could rebuild her home. Unfortunately, current legislation and policy do not allow for a longer exemption.

Based on their on-the-ground experience, the EJA member centre developed a package of recommendations for comprehensive disaster-related reforms. These include implementing automatic 13-week suspensions of mutual obligations for disaster-affected recipients, developing more effective systems for identifying and assisting affected individuals, and ensuring that impacted regions and postcodes are properly included in disaster zone declarations.

While 'pre-agreed off-the-shelf recovery packages' have proven vital immediately post-disaster, they do not support sustainable, community-led responses that guarantee appropriate access to social security support. Permanent core disaster response funding for social security legal assistance should support comprehensive disaster preparedness programs, sustained service delivery capacity in disaster-affected areas, and immediate post-disaster outreach capabilities. Critically, it must ensure specialist social security advocates and lawyers are available when disasters occur, instead of trying to build capacity after the fact.

Recommendation 113: That the Federal Government fund permanent core disaster response funding to ensure EJA members are able to undertake crucial resource and relationship development, and have the capacity to address current and pending need for specialist social security legal assistance related to natural disasters.

Poor funding of other legal assistance services in 4R areas

Community legal centres (CLCs), family violence prevention legal services (FVPLS) and Aboriginal and Torres Strait Islander legal services (ATSILS) help hundreds of thousands of people each year with their legal problems. These services have long been underfunded, with numerous independent reviews confirming substantial unmet legal need across Australia.⁵²

This project highlighted the commitment of community workers in 4R areas who were overwhelmingly doing their best to support the needs of their clients.

We get a bit creative and cover what we can when probably we shouldn't be. But ultimately, it's [because of our] client-centric approach that we have to do that.

— Rural Western Australia

Current funding structures under the National Legal Assistance Partnership 2020-25 are not based on needs assessments or the cost of ensuring full geographic access to assistance. The funding has also failed to keep pace with inflation, particularly in 4R areas. The 2024 National Access to Justice Partnership Agreement (NAJP) announcement of an uplift in funding, funding security beyond 30 June 2024 until 30 June 2030, and provided a brief reprieve, but it is not enough. For organisations servicing 4R Australia, geographic isolation significantly increases operational costs through additional travel, technology infrastructure, and specialised training needs.

Once clients were able to obtain their social security entitlements, most were able to reconnect with family and friends. In some cases, people who had been cut off from their children were able to see them again. Many clients returned to work, study, or volunteering.

⁵² [Attorney-General's Department \(2024\) Independent review of the National Legal Assistance Partnership 2020-25 Final Report; Productivity Commission \(2014\) Access to justice arrangements – Inquiry report; Law Council of Australia \(2018\) The Justice Project – Final report.](#)

According to Community Legal Centres Australia (CLCA), the peak organisation representing CLCs, addressing these challenges requires additional baseline funding to CLCs of \$230 million per year, including \$20.8 million specifically for 4R areas.⁵³ This modest recommendation is based on existing workforce, noting an increased workforce in 4R areas is required as detailed extensively by the 4Rs Community Legal Network.

First Nations Advocates Against Family Violence, the peak for FVPLS, maintains FVPLS need an additional \$12.3 million annually to deliver early intervention and prevention programs in remote locations.⁵⁴ National Aboriginal and Torres Strait Islander Legal Services, the peak for ATSILS, has identified critical funding shortfalls preventing ATSILS from providing adequate services, and seek long-term, needs-based funding arrangements shared by all levels of government, informed by self-determination.⁵⁵

Recommendation 114: That the Federal Government significantly increase funding to community legal centres as detailed in Community Legal Centres Australia's 2025-26 Federal Budget Submission.

Recommendation 115: That the Federal Government significantly increase funding to family violence prevention legal services as detailed in First Nations Advocates Against Family Violence 2025-26 Pre-Budget Submission.

Recommendation 116: That the Federal Government significantly increase funding to Aboriginal Torres Strait Islander Legal Services as detailed in National Aboriginal and Torres Strait Islander Legal Services Submission to the Independent Review of the National Legal Assistance Partnership 2020-25.

Difficulty recruiting and retaining experienced social security lawyers

The community legal sector faces difficulties recruiting and retaining staff, as they compete with government agencies and Legal Aid Commissions which routinely offer both higher salaries and more secure employment opportunities.

Staff retention has been an issue. I had a fantastic 'partner in crime', but she was headhunted to work for [government agency]. The money's way better and there's surety, because our programs are always based on this finite funding.

— Regional South Australia

The complexity of social security law demands significant investment in professional development. Minimal social security law is taught in Australian law schools, with most law students completing their degrees without studying any social security law.⁹ Lawyers new to the area require substantial training before they can provide advice. In 4R areas, these pressures are intensified by geographic isolation as lawyers often work with limited professional support networks and fewer resources.

⁵³ [Community Legal Centres Australia's 2025-26 Federal Budget Submission](#)

⁵⁴ [First Nations Advocates Against Family Violence 2025-26 Pre-Budget Submission](#)

⁵⁵ [National Aboriginal and Torres Strait Islander Legal Services Submission to the Independent Review of the National Legal Assistance Partnership 2020-25](#)

[Starting in social security law] was just a very confusing process, even for a lawyer like myself, because Centrelink [wasn't] clear and had their own parameters that needed to be met, [which we didn't learn about at law school].

— Remote Northern Territory

The system's reliance on short-term funding models creates inherently precarious employment conditions, contributing to high turnover rates as staff leave to pursue more stable opportunities. Services frequently find themselves dedicating substantial resources to recruiting and training junior staff, only to lose this investment when newly trained professionals depart. High turnover rates mean services must constantly allocate limited resources to recruitment, onboarding, and training rather than direct service delivery.

This creates a constant pressure to do more with less, stretching extremely limited resources and staff capacity to their limits.

The complexity of social security law and high turnover of staff, combined with the emotional toll of social security legal work, create uniquely demanding working conditions. The associated pressures are exacerbated by services regularly operating with limited funding and insufficient staff numbers to meet demand. This creates a constant pressure to do more with less, stretching extremely limited resources and staff capacity to their limits.

We try to be adaptable and we try to adjust to what clients need, but at the same time we have to be aware of our limitations in terms of the amount of funding we have and the number of solicitors. And we're sort of careful not to burn people out because that's increasingly an issue that comes up in CLCs, and particularly where you've got people who are traumatised and needing help right now. And so that can put a drain on [staff's] emotional resources.

— Remote Queensland



The housing crisis in 4R Australia has severely impacted staff recruitment and retention, undermining the delivery of essential legal services. For example, EJA member centre Kimberley Community Legal Service (KCLS) is the sole generalist community legal service in Western Australia's Kimberley region. KCLS's small legal team are responsible for an area almost twice the size of Victoria, serving communities across the Kimberley with one office in Kununurra and one in Broome. Despite being the only generalist legal service in this area, KCLS has been forced to close its books to new clients as of February 2024 due to severe staffing shortages. Numerous suitable candidates have declined offers of employment because there was no available housing in the Kimberley region. In a conversation with the Australian Broadcasting Corporation (ABC) in February 2024, KCLS's CEO explained:

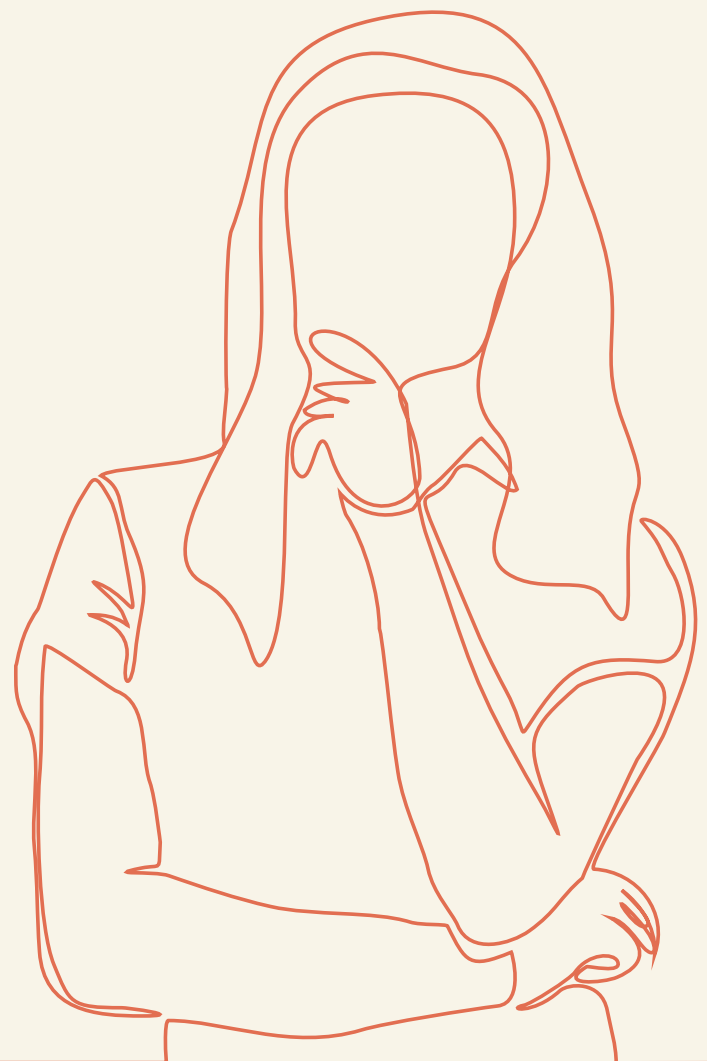
All we can do is be a bandaid. We can respond to the emergencies, we can deal with critical matters, but ... we don't have the resources to get to the heart of some of the problems.

We recently put out a recruitment round, and I spoke to one potential applicant, and they would have been highly suitable. He wanted \$30,000 on top of the wage that we could offer him to come to this region because that's what he placed the value ... for working remotely.

KCLS had a staff member living in a caravan park and previously lost eight applicants for a job due to lack of housing.

We need increased staffing, and to have increased staffing, we need increased funding. But without access to adequate housing, nothing matters.⁵⁶

For organisations servicing 4R Australia, geographic isolation significantly increases operational costs through additional travel, technology infrastructure, and specialised training needs.



⁵⁶ Read more about KCLS' experience [here](#).

Unlike their counterparts at Legal Aid commissions, CLCs do not receive funding or government housing allocations for staff, meaning they cannot offer housing support, remote allowances, airfares, or electricity subsidies. When legal services cannot maintain adequate staffing, their capacity to serve vulnerable communities is reduced. The result is a widening justice gap, where communities most in need of legal support find themselves with increasingly limited access to essential services.

The difficulty attracting and retaining expert staff to deliver legal advice in 4R communities has been extensively documented, including by the 4Rs Community Legal Network in their submission to the Independent Review of the National Legal Assistance Partnership,⁵⁷ which calls for:

- adequate tertiary training programs
- workforce strategy that addresses both attraction and retention
- more stable, long-term funding to enable secure employment
- sufficient remuneration and housing support

When legal services cannot maintain adequate staffing, their capacity to serve vulnerable communities is reduced. The result is a widening justice gap, where communities most in need of legal support find themselves with increasingly limited access to essential services.

Recommendation 117: That the Federal Government establish a National Regional, Rural, Remote and Very Remote Access to Justice Strategy and Action Plan.

Recommendation 118: That the Federal Government implement standards which enable sufficient funding to provide equitable salaries for community legal workers, not less than those paid by Legal Aid Commissions, in regional, rural, remote and very remote areas.

Recommendation 119: That the Federal Government introduce initiatives to support regional, rural, remote and very remote justice career options, including financial support for law students to undertake clinical and other placement programs, and financial incentives for practicing in non-metropolitan areas, such as a HELP loan forgiveness or reduction.

Appendix 1 – Contributors to this report

Advisory Group members

Bettina Cooper, Financial Counsellor and Strategy Lead, Mob Strong Debt Help, Financial Rights Legal Centre

Scarlet Wilcock, Senior Lecture, School of Law, Society & Criminology, UNSW Sydney

Faiza El-Higzi, Social Change Specialist, Multicultural Queensland Advisory Council, Square Circle, University of Queensland

Lisa Fowkes, Director, Employment Initiatives, Social Change Ventures

Judy Harrison, Lecturer, Charles Darwin University and Australian National University Law Schools

Lisa McClure, Acting CEO, Women's Legal Service South Australia

Cathy Pereira, Principal Solicitor, First Nations Women's Legal Service Queensland

Participant Interviewers

Taylah Bell, Sally Cameron, and Amy Schneider (EJA), Mark Morand and Aylin Yigit (Social Security Rights Victoria), Donna Flood and Allienttia Weldon-Oti (Welfare Rights Centre NSW), Olivia Tan (Wotton Kearney)

University of Queensland

Law Students – Myles Bowes McKee, Vicki Jaques, Aditi Kataria, Ingrid Meiklejohn, Kate Moulds, Macy Quinn, Claire Reid, Hayley Tolano, Zoe Fraser, Zoe Zhang and Abigail Ludjio, supported by Brigid Burto and Chloe Ryan, UQ Pro Bono Centre.

Melbourne University

Law Students – Kaitlin Jempson, Sabrina Berardinelli, Amelia Liu, Angela Stevens and Ruirui Tian, under the supervision of Professor Kristen Rundle and John Maloney, University of Melbourne's Executive Branch Research Lab. (Chapter 5)

Data analysis

Data analyst, Liss Ralston (Table 1, Chapter 5)

Report authors

This report is authored by EJA. The majority of drafting was undertaken by Taylah Bell (Project Lead) and Sally Cameron (Senior Law Reform Officer), with input by EJA staff and EJA member staff.

Research support

Olivia Tan and Joshua Williams (Wotton Kearney)

Appendix 2 – Acronyms

4R	Regional, rural, remote and very remote
AAT	Administrative Appeals Tribunal
ABSTUDY	Aboriginal Study Assistance Scheme
ANAO	Australian National Audit Office
ARO	Authorised Review Officer
ART	Administrative Review Tribunal
ATSILS	Aboriginal and Torres Strait Islander Legal Services
CALD	Culturally and Linguistically Diverse
CLC	Community Legal Centre
CLCA	Community Legal Centres Australia
CPSO	Community Partnership Specialist Officer
DSP	Disability Support Pension
DSS	Department of Social Services
EJA	Economic Justice Australia
FHA	Farm Household Allowance
FHCO	Farm Household Case Officer
FIS	Financial Information Service
FOI	Freedom of Information
FTB	Family Tax Benefit
FVPLS	Family Violence Prevention Legal Services
ISO	Indigenous Service Officers
KCLS	Kimberley Community Legal Service
MSC	Mobile Service Centre
myID	Digital identity verification system (previously myGovID)
NAAP	National Agent & Access Points Program
NAJP	National Access to Justice Partnership
NLAP	National Legal Assistance Partnership
POI	Proof of Identity
POS	Program of Support
RRC	Robodebt Royal Commission
RST	Remote Servicing Team
SME	Subject Matter Expert
SSRV	Social Security Rights Victoria
TE _x	Trust Exchange

Appendix 3 – Interview Participants

EJA members

Basic Rights Queensland Inc.

Canberra Community Law

Social Security Rights Victoria

Welfare Rights & Advocacy Service

Welfare Rights Centre (NSW)

Barwon Community Legal Service

Central Australian Women's Legal Service

Darwin Community Legal Service

Fremantle Community Legal Centre

Hobart Community Legal Service Inc.

Illawarra Legal Centre

Katherine Women's Information & Legal Service

Kimberley Community Legal Service

Launceston Community Legal Centre

Mid North Coast Legal Centre

Monash Law Clinics

North Australian Aboriginal Family Legal Service

Northern Australian Aboriginal Justice Agency

Sussex Street Community Law Service

Top End Women's Legal Service

Townsville Community Law

Uniting Communities Law Centre

Other organisations

Aboriginal and Torres Strait Islander Women's Legal Service

Albany Community Legal Centre

Anglicare NT – Alice Springs

Anglicare NT – East Arnhem Land

Anglicare Victoria

Anyinginyi Health Aboriginal Corporation

Barnardos Nyngan

Barwon Community Legal Service

Biloela Interagency
Care Goondiwindi Association Inc
Catholic Care NSW Nyngan
Centacare Catholic Community Services South Australia
Central Australian Aboriginal Family Legal Unit
Central Australian Youth Link Up Service
Central Land Council
Central Queensland Financial Counselling Service
Charles Darwin University
Community Legal Centres South Australia
Consumer Action Law Centre
Consumer Protection WA
Department of Justice and Attorney General Rockhampton
Disability Advocacy NSW Dubbo
Disability Advocacy NSW Newcastle
Dubbo Neighbourhood Centre
EACH Financial Counselling
Family Violence Legal Service Aboriginal Corporation South Australia
Financial Counselling Victoria
Fremantle Community Legal Centre
GAPDL Communities for Children Gladstone
Gippsland Community Legal Service
Gladstone Mindcare
Gladstone Women's Health Centre
Good Sheppard – Victoria
Legal Aid WA Broome
Liberty Domestic & Family Violence Service NSW
Mallee Community Legal Centre
Mallee Family Care Financial Counselling
Marninwarntikura Women's Resource Centre
Marra Worra Worra Aboriginal Corporation
Mission Australia Nyngan
Mob Strong Debt Help

Monash Law Clinics
Multicultural Australia Rockhampton
MyPathway Doomadgee
Navigator Pilot Program, Catholic Care Central Queensland
Northern Territory Legal Aid
North West Community Legal Centre
NPY Women's Council
Nyngan Land Council
Parents to Children Association Qld Gladstone
Regional Alliance West
Roseberry Queensland Gladstone
Rural Financial Counselling Service
Stronger Communities Gladstone
Tangentyere Council Aboriginal Corporation
Tennant Creek Women's Refuge Inc
The Gender Centre
Townsville Multicultural Support Group
Western NSW Community Legal Centre
Western Womens Domestic Violence Service
Womens Legal Service NSW
Womens Legal Service Victoria

Appendix 4 – Interview Questions

1. How many years of experience do you have in community/social/financial counsellor work?
2. Of that, how long have you practiced in regional, rural, remote or very remote Australia?
3. In your best estimate, what percentage of your caseload involves people experiencing social security issues?
4. What percentage of your clients are women?
5. Can you provide an overview of the communities and geographic areas that your service covers?
6. In your experience, what barriers do clients typically face when seeking legal assistance?
7. Have you observed any unmet legal needs within the communities you serve?
8. From the clients you see, can you give me an overview of the typical client experience when attempting to access and maintain social security payments?
9. What level of knowledge do your clients typically possess regarding social security payments?
10. Of women seeking your assistance, what are common social security issues that you see?
11. Have you observed community perceptions regarding women as Centrelink recipients?
12. Aside from social security issues, what other issues do women seeking your assistance commonly experience?
13. How would you describe the financial security and literacy of your clients?
14. What insights can you share about the health, wellbeing, and family life of your clients?
15. Are legal and social issues consistent across communities, or do unique factors influence them? If so, what are those factors?
16. Can you share success stories or positive experiences of women accessing social security in your practice?
17. Do your clients encounter barriers when communicating with Centrelink?
18. What would you change about our social security system?
19. In an ideal world, what would our social security system look like? (e.g. face to face service, valuable employment, local community working with Centrelink)
20. Who else should we interview?

Appendix 5 – Snapshot of Women in 4R Australia References

1. National Rural Women's Coalition (2022) The RRR Woman in 2023 Position Paper. <https://www.nrwc.com.au/resources/position-papers/114-the-rrr-women-in-2023/file> [referring to Australian Bureau of Statistics 2021 Census QuickStats: Australia (abs.gov.au)]
2. Ibid.
3. Australian Bureau of Statistics. (2023). Labour force status of families, June 2023. <https://www.abs.gov.au/statistics/labour/employment-and-unemployment/labour-force-status-families/latest-release>
4. Australian Bureau of Statistics. (2023). Labour force status of families, June 2023. <https://www.abs.gov.au/statistics/labour/employment-and-unemployment/labour-force-status-families/latest-release>
5. Australian Institute of Health and Welfare. (2023). Informal carers. <https://www.aihw.gov.au/reports/australias-welfare/informal-carers>
6. Australian Institute of Health and Welfare. (2024). Rural and remote health. <https://www.aihw.gov.au/reports/rural-remote-australians/rural-and-remote-health> [Note: This data is derived from the 2016 Personal Safety Survey]
7. National Rural Women's Coalition (2022) The RRR Woman in 2023 Position Paper. <https://www.nrwc.com.au/resources/position-papers/114-the-rrr-women-in-2023/file>
8. YWCA National Housing. (2020). Women's Housing Needs in Regional Australia. <https://apo.org.au/node/305158> [Citing: ABS Census 2016; SEXP Sex, AGEP Age and INCP Total Personal Income (weekly) by GCCSA (UR)]
9. The Law Council. (2018). The Justice Project Rural, Regional and Remote (RRR) Australians. https://lawcouncil.au/files/web-pdf/Justice%20Project/Final%20Report/Justice%20Project%20_%20Final%20Report%20in%20full.pdf
10. Department of Social Services. (2024). Expanded DSS Benefit and Payment Recipient Demographics – September 2024. <https://data.gov.au/dataset/ds-dga-cff2ae8a-55e4-47db-a66d-e177fe0ac6a0/distribution/dist-dga-fdbaedf6-70e9-4751-bb43-613bbc47e2c7/details?q=payment%20demographic%20data>
11. Data obtained from the Department of Social Services. From December 2022, Services Australia have implemented a change in the Centrelink payment system to recognise gender other than the sex assigned at birth or during infancy, or as a gender which is not exclusively male or female. To protect the privacy of individuals and comply with confidential policy, persons identifying as 'non binary' will initially be grouped with 'females' in the period immediately following implementation of this change. The Department of Social Services will monitor the implications of this change and will publish the 'non-binary' gender category as soon as privacy and confidential considerations allow.
12. Urbis. (2023). 2022 National profile of solicitors. Prepared for the Law Society of NSW Retrieved from <https://www.lawsociety.com.au/sites/default/files/2023-05/2022%20National%20Profile%20of%20Solicitors%20-%20Final.pdf> ; Independent Review of the National Legal Assistance Partnership (2024) <https://www.ag.gov.au/sites/default/files/2024-06/NLAP-review-report.PDF>



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