

TANGENTYERE
COUNCIL
REPORT
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Tangentyere
Council

Senate Inquiry into the Social Security Amendment Bill 2019

Income Management to Cashless
Debit card Transition

WORKING
TOGETHER
WALKING
TOGETHER

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1.Executive Summary

Tangentyere Council welcomes the opportunity to contribute to the Senate Community Affairs Legislation Committee Inquiry into the *Social Security (Administration) Amendment (Income Management to Cashless Debit Card Transition) Bill 2019*.

Tangentyere Council Aboriginal Corporation (TCAC) presented to the Senate Community Affairs Legislation Committee at the Public Hearing conducted as part of the Inquiry considering the *Social Security (Administration) Amendment (Income Management to Cashless Debit Card Transition) Bill 2019*. This Public Hearing was held in Alice Springs on Thursday, 31st October 2019.

During evidence presented, TCAC outlined the opposition of its Board and Members to the proposed transition from income management to cashless debit card. Additionally, TCAC outlined its opposition to the continuation of all forms of compulsory income management.

The primary issues identified by TCAC included the impact of income management and the proposed Cashless Debit Card (CDC) on a range of areas including: (1) Local Decision Making, Self Determination and Community Control; (2) the lack of evidence that income management and the CDC deliver outcomes for health and well-being; (3) issues related to Proof of Identity (POI) and Financial Exclusion; (4) the delegation provided by the legislation that allows the rate of income management to be increased to 100%; and (5) the lack of measures contained in the legislation to tackle the issue of multidimensional disadvantage and poverty.

TCAC made 3 recommendations during the Public Hearing as follows:

- Repeal compulsory income management in favour of voluntary income management;
- Implement a rigorous and independent evaluation of income management;
- Re-invest CDC transition funds to support increased rates of income support.

Since the Public Hearing, TCAC has further considered several issues related to the relationship between Department of Human Services (Centrelink) and Indue Proof of Identity (POI) processes and the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* and AUSTRAC requirements. TCAC was also curious to note that Indue Pty Ltd is not a member of either the Australian Bankers Association (ABA) or the Customer Owned Banking Association (COBA). TCAC understands that both the ABA and COBA have developed a code of conduct and policy frameworks that their member institutions need to comply with. Presumably this work of policy development has responded to the Royal Commission. Presumably institutions that are not members of the ABA and COBA are not required to comply with standards set by these representative organisations. TCAC is also concerned that the consolidation of income support in an institution without infrastructure and shopfront is an issue for individuals who favour over the counter transactions. Further this consolidation and the potential for increased rates of income support appear to impact upon consumer choice and the market.

TCAC has added 3 additional recommendations since the Public Hearing as follows:

- Compare CDC POI requirements with those outlined by AML/CTF Act and AUSTRAC;
- Compare Indue standards and code of conduct with ABA/COBA standards and code of conduct;
- Undertake an assessment of the impact of the inability of individuals to access in person banking.

TCAC opposes compulsory income management and the CDC. TCAC recommends that the rate of Newstart and Related Payments be increased by a base rate of \$75 per week as a universal first step. Raising the rate of income support will do far more to tackle the social and environmental determinants of health and well-being.

2. Background

Tangentyere Council is an Aboriginal Community Controlled Organisation that delivers human services and operates social enterprises for the benefit of Aboriginal people from Alice Springs, its Town Camps and Central Australia.

2.1. Tangentyere Council Aboriginal Corporation (TCAC)

TCAC is a community controlled Public Benevolent Institution delivering human services and social enterprise activities for the benefit of Aboriginal people from the Town Camps, Urban Alice Springs and Central Australia. TCAC was first incorporated in 1979. Between 1979 and August 2015 TCAC was incorporated under the Associations Act 2008 (NT). To comply with the Commonwealth Government requirement for Indigenous organizations to be incorporated under the Corporations (Aboriginal and Torres Strait Islander) Act 2006 (CATSI) in order to receive Indigenous Advancement Strategy funding in excess of \$500,000, TCAC transferred incorporation to the CATSI Act. TCAC transferred incorporation on the 14th August 2015. The organization was a finalist in the 2016 Reconciliation Australia, Indigenous Governance Awards and is one of the 8 largest Aboriginal Corporations in Australia.

The Corporate Members of TCAC are the Town Camp Housing Associations/Aboriginal Corporations and the members of these Associations/Aboriginal Corporations are individual members of TCAC. Today, TCAC has >600 members. The TCAC Board of Directors is composed of the elected Presidents of the Alice Springs Town Camp Housing Associations/Aboriginal Corporations.

TCAC was formed to assist the Town Campers to gain legal tenure and in order to obtain water, electricity and housing. From 1979 until December 2009 TCAC operated as an Indigenous Community Housing Organisation (ICHO) and service provider.

In 2009, 11 Town Camp Housing Associations and 3 Aboriginal Corporations executed Tripartite Alice Springs Living Area Subleases with the Executive Director of Township Leasing (EDTL) on behalf of the Commonwealth and the CEO of Housing on behalf of the Territory. The EDTL then entered a Housing Management Agreement (underlease) with the Northern Territory Government making the Department of Local Government, Housing and Community Development (DLGHCD) the Housing Authority for the Alice Springs Town Camps. TCAC demonstrated its adaptability to this changed circumstance by re-positioning itself as a Human Services Organisation and by developing and founding the Central Australian Affordable Housing Company (CAAHC). CAAHC was the first nationally accredited community housing provider in the NT. TCAC together with its subsidiary Tangentyere Constructions & CAAHC have proposed to the EDTL a collective strategy for the development and implementation a Community Housing Model. Both the EDTL and the DLGHCD through the Town Camp Futures Unit are receptive to this proposal.

Currently TCAC provides a broad range of Human Services including: (1) Community Centers; (2) Youth Development; (3) Tenancy Support; (4) Aged; (5) Municipal and Essential Services; (6) Repairs and Maintenance; (7) Construction; (8) Child Protection and Wellbeing; (9) Alcohol and Other Drug Harm Minimisation; (10) Community Safety and Wellbeing; (11) Violence Prevention; and (12) Employment. TCAC is committed to the employment and capacity development of Aboriginal people. 55% of the TCAC workforce of 273 people is Aboriginal. Inherent within TCAC employment of local Aboriginal people is the concept of Continuing Professional Development (CPD). An emphasis on CPD means that the organisation is well placed to recruit and develop jobseekers.

2.2. Alice Springs Town Camps

The following table provides an overview of the TCAC Town Camp Corporate Members:

Figure 1: Alice Springs Town Camps, Incorporation and Tenure					
Name	Alias	Incorporated	Tenure	Lot	Executed
Akngwertnarre	Morris Soak	14/11/1974	SPL-438	5150	22/12/1977
Anthelk-Ewlpaye	Charles Creek	16/07/1974	SPL-426	3702, 3704, 1733	12/08/1977
Anthepe Housing	Drive In	8/03/1974	SPL-412	5146	8/11/1976
Aper-Alwerrkng	Palmer's Camp	17/04/1977	SPL-459	5180	25/07/1979
Ewyenper-Atwatye	Hidden Valley	11/08/1977	SPL-473	5189	30/01/1980
Ilparpa	Ilparpa	25/10/1979	SPL-493	5713	2/07/1980
Ilperle Tyathe	Warlpiri	17/11/1978	SPL-450	5149	30/01/1979
Ilyperenye	Old Timers	22/08/1977	SPL-550	5708	14/09/1981
Inarleng	Little Sisters	28/02/1978	Crown-1112	3701	11/06/1973
Irrkerlantye	White Gate	28/10/1992	n/a	n/a	n/a
Itwiyethwenge	Basso's Farm	n/a	SPL-554	5123	16/07/1976
Karnte	Karnte	11/07/1983	Crown- 1111	7850	1/02/1988
Lhenpe Artnwe	Hoppy's Camp	6/08/1986	n/a	0	n/a
Mount Nancy	Mount Nancy	16/07/1974	SPL-409	5135	16/07/1976
Mpwetyerre	Abbotts Camp	25/10/1979	SPL-543	2664	4/07/1980
Nyewente	Trucking Yards	6/02/1975	SPL-449	5152	28/12/1978
Yarrenyty Arltere	Larapinta Valley	17/11/1978	SPL-536	5195	23/06/1981

Further details relevant to the detail of this inquiry will be considered under the key impact areas later in the submission.

2.3. Community Development Program Region 23

Tangentyere Employment Service (TES) is the Community Development Program (CDP) provider for CDP Region 23 including the Alice Springs Town Camps, Outstations and Amoonguna.

The caseload in Region 23 is predominately Aboriginal and culturally and linguistically diverse. Aboriginal people living in Town Camps, Outstations and Amoonguna have a shared experience of multidimensional disadvantage.

TCAC recognises the social determinants of health and the relationship between the conditions in which people are born, grow, live, work and age and inequities in health and wellbeing. These determinants relate to social, economic, environmental and cultural conditions. TCAC considers that the current levels of income support are inadequate and that they contribute to poor public health and wellbeing outcomes.

These locations are at best on the outskirts of Alice Springs and in some cases can be considered remote. In the case of the Alice Springs Town Camps these locations are considered part of Alice Springs but unlike the rest of Alice Springs the amenity of the Town Camps is inconsistent with the surrounding suburbs.

Within Region 23 all recipients of Newstart and Youth Allowance are required to participate in the Community Development Program. Given that TCAC is the CDP provider for Region 23 it is well placed to reflect upon the number of individuals residing in this region who receive Newstart and Youth Allowance.

The following table outlines the number of CDP participants across Region 23 by individual location:

Figure 2: CDP Region 23 Participants by Location			
Name	Alias	Location Type	CDP Jobseekers
16 Mile Camp	Bond Springs	Outstation	3
Akngwertnarre	Morris Soak	Town Camp	10
Alatyeye	Turners Camp	Outstation	12
Alkupitja	Gillen Bore	Outstation	13
Amoonguna		CLA	108
Anthelk-Ewlpaye	Charles Creek	Town Camp	21
Anthepe Housing	Drive In	Town Camp	14
Aper-Alwerrkngge	Palmer's	Town Camp	6
Apmere Mwerre		Visitor	3
Artekerre	Harry Creek	Outstation	7
Black Tank Bore	n/a	Outstation	6
Corkwood Bore	Morris Dam	Outstation	17
Ewyenper-Atwatye	Hidden Valley	Town Camp	69
Ilparpa	Ilparpa	Town Camp	17
Ilperle Tyathe	Warlpiri	Town Camp	10
Ilpeye-Ilpeye	Golders	Town Camp	14
Ilperenye	Old Timers	Town Camp	21
Inarlengge	Little Sisters	Town Camp	31
Irrkerlantye	White Gate	Town Camp	5
Itwiyethwenge	Basso's	Town Camp	2
Karnte	Karnte	Town Camp	15
Lhenpe Artnwe	Hoppy's	Town Camp	6
Mount Nancy		Town Camp	7
Mpwetyerre	Abbott	Town Camp	22
Nyewente	Trucking Yards	Town Camp	21
Percy Court		Transitional	4
Rural		Rural Suburbs	17
Undoolya Bore	Mount Undoolya	Outstation	5
Werre-Therre	Hamilton Downs	Outstation	12
Yamba-Mpweringe	Burt Creek	Outstation	12
Yarrenyty Arltere	Larapinta Valley	Town Camp	41
Total			551

NB- Of this caseload 85% of individuals receive Newstart and 9% receive Youth Allowance. The remaining group receive payments including Parenting, Carer and Disability Payments.

The data outlined in Figure 2 can be directly compared with the ABS data for both Amoonguna Indigenous Location (ILO) and Alice Springs Town Camps Indigenous Area (IARE).

This comparison between Region 23 Community Development Program participants who are jobseekers and individuals defined as being 'unemployed', 'away from work' or employed 'part time' by the ABS highlights a significant discrepancy in population estimates. This is outlined below:

Figure 3: CDP and ABS Comparison		CDP	ABS 2011			
Name	Alias	Jobseekers	Unemployed	Away from Work	PTE	Total
Amoonguna		108	50	4	18	72
Akngwertnarre	Morris Soak	10	42	12	24	78
Anthelk-Ewlpaye	Charles Creek	21				
Anthepe Housing	Drive In	14				
Aper-Alwerrkng	Palmer's	6				
Ewyenper-Atwatye	Hidden Valley	69				
Ilparpa	Ilparpa	17				
Ilperle Tyathe	Warlpiri	10				
Ilpeye-Ilpeye	Golders	14				
Ilpyerenye	Old Timers	21				
Inarleng	Little Sisters	31				
Irrkerlantye	White Gate	5				
Itwiyethwenge	Basso's	2				
Karnte	Karnte	15				
Lhenpe Artnwe	Hoppy's	6				
Mount Nancy		7				
Mpwetyerre	Abbott	22				
Nyewente	Trucking Yards	21				
Yarreny Arltere	Larapinta Valley	41				
Apmere Mwerre		3				
Percy Court		4				
Total		447	92	16	42	150

At the time of writing this submission TES has 551 people on its caseload. On this basis the population of jobseekers as identified by the ABS is 34% of that identified by Centrelink and TCAC through the CDP caseload.

There is significant linguistic diversity in Region 23. The following table outlines the language groups present in Region 23.

Figure 4: CDP Region 23 Town Camps, Outstations, Communities and Language Groups			
Name	Alias	Location Type	Languages
16 Mile Camp	Bond Springs	Outstation	Arrernte
Akngwertnarre	Morris Soak	Town Camp	Warlpiri
Alatyeye	Turners Camp	Outstation	Arrernte
Alkupitja	Gillen Bore	Outstation	Arrernte
Amoonguna		Community	Arrernte
Anthelk-Ewlpaye	Charles Creek	Town Camp	Arrernte, Anmatyerr
Anthepe Housing	Drive In	Town Camp	Arrernte, Warlpiri, Luritja, Pitjantjatjara
Aper-Alwerrkng	Palmer's	Town Camp	Arrernte
Artekerre	Harry Creek	Outstation	Arrernte
Black Tank Bore	n/a	Outstation	Arrernte
Corkwood Bore	Morris Dam	Outstation	Arrernte
Ewyenper-Atwatye	Hidden Valley	Town Camp	Arrernte, Warlpiri
Ilparpa	Ilparpa	Town Camp	Arrernte, Pertame, Luritja
Ilperle Tyathe	Warlpiri	Town Camp	Warlpiri
Ilpeye-Ilpeye	Golders	Town Camp	Arrernte
Ilyperenye	Old Timers	Town Camp	Arrernte, Warlpiri, Luritja, Pitjantjatjara
Inarleng	Little Sisters	Town Camp	Arrernte, Warlpiri, Luritja, Pitjantjatjara
Irrkerlantye	White Gate	Town Camp	Arrernte
Itwiyethwenge	Basso's	Town Camp	Arrernte, Kaytetye, Anmatyerr, Alyawarr
Karnte	Karnte	Town Camp	Luritja, Pitjantjatjara
Lhenpe Artnwe	Hoppy's	Town Camp	Arrernte, Pertame, Luritja, Anmatyerr
Mount Nancy		Town Camp	Arrernte, Kaytetye, Anmatyerr, Alyawarr
Mpwetyerre	Abbott	Town Camp	Arrernte, Warlpiri, Luritja, Pitjantjatjara, Warumungu
Nyewente	Trucking Yards	Town Camp	Arrernte, Luritja
Undoolya Bore	Mount Undoolya	Outstation	Arrernte
Werre-Therre	Hamilton Downs	Outstation	Arrernte
Yamba-Mpweringe	Burt Creek	Outstation	Arrernte
Yarrenyty Arltere	Larapinta Valley	Town Camp	Arrernte, Pertame, Luritja, Pitjantjatjara

Anecdotal evidence suggests that most jobseekers living on the Town Camps, Outstations and Amoonguna are language speakers. This anecdotal evidence is not necessarily consistent with Department of Human Services data on the subject. TCAC will seek to quantify the prevalence of language amongst its stakeholders.

2.4. Other Income Support Related Stressors

TCAC provided a submission to the Senate Finance and Public Administration Committee for the inquiry into the appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program. In this submission we identified that research undertaken by the Centre for Aboriginal Economic Policy Research (CAEPR) at the Australian National University (ANU) demonstrated that Aboriginal people living in remote and very remote areas are breached from income support payments at ~56 times the rate of income support recipients in urban areas. During this submission we identified that the primary reason for this level of breaching was related to the significant level of participation required from remote income support recipients in 'Work for the Dole' and other mutual obligation activities. Activity requirements for remote income support recipients are far higher than that of urban job seekers.

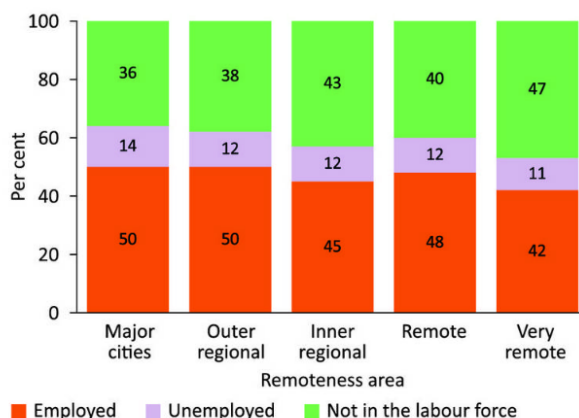
The rates of breaching and the number of people not receiving income support contributes to the low rates of income support and means that the income support safety net is failing. The failure of this safety net impacts significantly upon children, families and other areas such as tenancy sustainability. When a recipient's income support payments stop (even temporarily) all Income Management/Centrelink deductions stop. Stopped deductions result in debt including housing debts as rent deductions stop. This system can lead to significant additional financial stress on families who are already struggling financially, compounding other significant stressors they are often facing.

According to the following table only 42% of Aboriginal people aged 15-64 from very remote areas are employed, 11% are unemployed and the remainder are not in the labour force. Tangentyere is concerned that many people designated as 'not in labour force' simply don't receive any income. Once again, these figures and the following table have been outlined in our submission to the Senate Finance and Public Administration Committee for the inquiry into the appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program. It is felt that there are multiple determinants impacting upon these figures.

■ Aboriginal and Torres Strait Islander peoples
■ Non-Indigenous Australians

Source: ABS and AIHW analysis of 2012-13
AATSIHS and 2012 SEW

Figure 2.07-3 Labour force status of Indigenous persons aged 15-64 years, by remoteness, 2012-13



3.Key Areas

Aboriginal people from Alice Springs, its Town Camps and Central Australia are being impacted by the consequences of multidimensional disadvantage. TCAC opposes compulsory income management and the Cashless Debit Card (CDC).

3.1. Local Decision Making

Tangentyere values the concepts of self-determination and community control. On this basis the organisation entered into a Local Decision-Making (LDM) Commitment Agreement with the Territory in July. Tangentyere considers LDM to be one mechanism for the support of self-determination and community control. Tangentyere recognises that the strongest pathway for the achievement of these goals is one that is Tripartite and that includes Tangentyere and its Members together with the Territory and the Commonwealth.

Our Board and Members do not consider Compulsory Income Management as something that supports the aspiration for Self Determination and Community Control. TCAC is working to promote engagement, participation, community development and leadership in decision making. The lack of agency afforded by income management for individuals and households to make decisions about their income and expenditure undermines the concepts of self-determination and community control.

3.2. Lack of Evidence

The Tangentyere Research Hub participated in the Evaluation of New Income Management in the Northern Territory in 2014. This Evaluation was led by the University of NSW and ANU. The final report stated that there is no evidence for significant changes to outcomes for people except for a limited improvement for people on voluntary income management. The report said that there was little improvement for: (1) Food Security; (2) AOD Harm Minimisation; (3) Gambling Harm Minimisation; (4) Financial Management Skills; and (5) Children and Schooling.

The Department of Social Services commissioned the evaluation of CDC in trial sites. The evaluation produced 3 reports presumably to compare conditions before, during and after the trial period. Analysis from various parties has questioned the evaluation process. Most notably the Australian National Audit Office (ANAO) has questioned the process and findings of the report. The ANAO found that the evaluation did not constitute a robust longitudinal study, that it did not properly consider baseline data and that no control group was used to make comparison. The ANAO also identified project governance and management as potential issues.

3.3. Proof of Identity and Banking

Tangentyere has operated a Photo ID Service since 2008. This service was commenced in response to the impact of the Anti-Money Laundering and Counter-Terrorism Act. This legislation changed the way that banks conduct their business and required our stakeholders to produce Photo ID for over the counter bank transactions. Over 12,000 people have accessed this service on thousands of occasions for new cards, renewals and replacement cards. Most individuals have continued to renew cards demonstrating that they have not transitioned to NT Government issued Photo ID. Unfortunately, drivers licencing sits at approximately 25%. The issue here is that people are predominately using Photo ID for over the counter/in person transactions. This related to issues of internet accessibility; language; and literacy. With the introduction of the CDC and its management by Indue, Tangentyere is concerned about the lack of a shopfront, the introduction of a new financial institution; and the lack of digital accessibility. This is poor public policy and will create further challenges.

TCAC has a range of concerns but a significant point is the relationship between Department of Human Services (Centrelink) Proof of Identity (POI) processes and the issuing of the Cashless Debit Card (CDC) by Indue. This point extends beyond the issuing of the CDC to include deposits and transactions.

From the TCAC perspective Centrelink POI processes are not necessarily consistent with the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*. This has not been a challenge for Centrelink (prior to CDC), but the issuing of the CDC by Indue and all other services delivered by Indue as a financial institution/bank should be governed by the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*.

The Integrated Case Management Service (ICMS) was inaugurated at Tangentyere Council in 2007/2008. One key function of the ICMS between 2008 and the end of the 2012/2013 financial year was the provision of the Tangentyere Proof of Identity (POI) Card. At the conclusion of the ICMS (30/06/2013), TCAC continued to operate the Tangentyere POI Card. This is a high demand service reflecting the challenges that many Aboriginal people have with obtaining Photo ID. Between 2008 and today this service has issued POI to >10,000 individuals from Alice Springs, its Town Camps, MacDonnell, Central Desert and Barkly Regional Councils; the APY Lands (SA) and Ngaanyatjarra Council (WA). ~66% of those individuals who have been issued the Tangentyere POI Card have continued to renew these cards (i.e. have maintained unexpired cards suggesting that they are continuing to use this form of POI). The primary use of the Tangentyere Card is to support over the counter transactions at banks including Westpac, Commonwealth and smaller institutions including Credit Unions. The strong bias in favour of over the counter transactions was noted at the CDC Public Hearing (by TCAC). Operating this service provided insights into the issue of variations in nomenclature (i.e. variation between birth name and preferred names); variations in DOB; and variations in the confirmation processes for POI and Proof of Address (between institutions etc.). TCAC needed to navigate such processes as those used by the Motor Vehicle Registry (MVR), Centrelink and the Banks in order that the Tangentyere POI Card be recognized (and of value).

Centrelink POI confirmation for many Aboriginal people has relied heavily on the 'Confirmation of Identity-Verification for Aboriginal and Torres Strait Islander people form (RA010)¹. The RA010 is flexible and allows individuals with little or no POI to receive income support. One unintended consequence is that the RA010 form (and process) exacerbates the prevalence of variations in nomenclature and DOB for individuals, i.e. the name an individual uses daily is frequently different from their birth name and DOB information is frequently an estimate with the form 1st January or 1st July etc.

With respect to names there are many reasons for variation including: (1) cultural mourning practices; (2) the incorrect assessment by some systems that skin names are surnames; and (3) intercultural administration errors. Historically Centrelink would assist people to establish bank accounts with letters of introduction. Since the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* was implemented the practice of providing letters of introduction stopped.

In short, the RA010 is very useful for Aboriginal people without POI documents but it tends to favour variations in nomenclature and variations in DOB. Additionally, Centrelink doesn't have rigorous processes around confirmation of address. Financial institutions generally only accept POI that shows legal name, confirmed DOB and address. Centrelink cannot confirm details of legal name and DOB to Indue for many clients where their identity has been confirmed with the RA010. Confirmation of POI using the RA010 is a reality for many Aboriginal people from remote and regional parts of the NT (and other parts of Australia). On this basis confirmation of identity by the banks should be separate from processes used by Centrelink as this arguably mitigates risk.

¹ <https://www.humanservices.gov.au/individuals/forms/ra010>

From 2008 the banks (at least locally) required photo ID for establishing accounts, replacement cards and over the counter transactions. The banks collaborated with TCAC and other organisations including Larakia (in Darwin) to ensure that individuals were not financially excluded due to not having photo ID. This work was all referenced back to compliance with the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*. It needs to be acknowledged that rates of drivers licensing among many Aboriginal populations in the NT are quite low. Baker Heart and Diabetes Institute and TCAC found that the rate sat at ~25% for Town Camp residents of an age where drivers licensing could be expected (this is due to a combination of factors including POI, outstanding fines and some classes of offence). This reality is likely to be consistent throughout Central Australia (and the NT).

Our recommendation is that someone who is suitably qualified could investigate Centrelink/Indue POI processes and their compliance with the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*. Indue is delivering services aligned with banking regarding the CDC and the administration of income support funds. If compliance cannot be demonstrated, then the CDC should not be expanded and should be discontinued in trial sites.

During the development and implementation of the Tangentyere POI Card, TCAC had contact with several external parties including the Australian Bankers Association (ABA). The ABA is “an association of 23 member banks in Australia”, the ABA “provides analysis, advice and advocacy for the banking industry and contributes to the development of public policy on banking and other financial services”. TCAC is aware that the ABA has developed an industry code and has developed accessibility principles for vulnerable customers. Similarly, the Customer Owned Banking Association COBA has 64 member institutions and fulfils a similar function to the ABA on behalf of the Customer Owned Banking sector. Indue does not appear to be a member of the ABA or the COBA.

TCAC understands that both the ABA and COBA have developed a code of conduct and policy frameworks that their member institutions need to comply with. Presumably this work of policy development has responded to the Royal Commission. Institutions that are not members of the ABA and COBA are not required to comply with standards set by these representative organisations. TCAC is also concerned that the consolidation of income support in an institution without infrastructure and shopfront is an issue for individuals who favour over the counter transactions. Further this consolidation and the potential for increased rates of income support appear to impact upon consumer choice and the market.

Another organisation actor in this space is AUSTRAC. It appears that AUSTRAC has implemented some changes for ‘identifying customers who don’t have conventional forms of ID’. This represents another area to be considered. “AUSTRAC recommends a flexible approach to identifying and verifying customers who don’t have conventional ID”, it also outlines the consideration of processes for risk management.

The activation process is problematic as it requires: (1) Cashless Debit Card ID and Activation Number (therefore access to postal services); (2) Centrelink Customer Reference Number; (3) DOB; (4) Email; (5) Bank Account Number; and (6) Income Support Payment Type.

The options for activation are limited. Access to NBN (Fixed Line and/or Satellite) is another issue. Historically the banks discouraged internet banking for individuals with poor literacy and numeracy on the basis that this creates vulnerability. This is where the input of the ABA could be valuable. It should be noted that postal services are limited and inconsistent in regional and remote Central Australia. Several Town Camps which are in Alice Springs don’t have postal services, several Town Camps have insecure cluster box services and remote communities have centralized and informal post services.

It would be ideal to compare processes followed by Indue and the standards set by the ABA and COBA for their members.

3.4. Digital and Postal Delivery of CDC Activation Services

The activation process is problematic as it requires: (1) Cashless Debit Card ID and Activation Number (therefore access to postal services); (2) Centrelink Customer Reference Number; (3) DOB; (4) Email; (5) Bank Account Number; and (6) Income Support Payment Type.

Access to the internet and reliable postal services on the Town Camps presents challenges. The following table outlines the state of communications on the Town Camps:

Figure 12: Communications on the Alice Springs Town Camps					
Name	Post Provider	Post Service	Post Frequency	Proposed NBN	Status
Akngwertnarre	Australia Post	Premises	Daily	FTTN	Pending
Anthelk-Ewlpaye	Subcontractor	Premises	Weekly	FTTN	Pending
Anthepe Housing	Subcontractor	Cluster Box	Weekly	Satellite	Available
Aper-Alwerrkngge	Subcontractor	Cluster Box	Weekly	FTTN	Pending
Ewyenper-Atwatye	Subcontractor	Premises	Weekly	Satellite	Available
Ilparpa	n/a	n/a	n/a	FTTN	Pending
Ilperle Tyathe	n/a	n/a	n/a	FTTN	Pending
Ilyperenye	n/a	n/a	n/a	FTTN	Pending
Inarlenge	Subcontractor	Cluster Box	Weekly	Satellite	Available
Irrkerlantye	n/a	n/a	n/a	Satellite	Available
Itwiyethwenge	Subcontractor	Cluster Box	Weekly	Satellite	Available
Karnte	Subcontractor	Cluster Box	Weekly	Satellite	Available
Lhenpe Artuwe	Subcontractor	Premises	Weekly	Satellite	Available
Mount Nancy	Subcontractor	Cluster Box	Weekly	FTTN	Pending
Mpwetyerre	Subcontractor	Premises	Weekly	FTTN	Pending
Nyewente	Subcontractor	Premises	Weekly	FTTN	Pending
Yarrenyty Arltete	Subcontractor	Premises	Weekly	FTTN	Pending

These challenges are not unique to the Town Camps but are relevant to regional and remote Australia.

3.5. Ability to Increase Rates of Income Management

TCAC is concerned that the current bill allows the Minister to increase the rate of quarantining to 100% without the requirement of new legislation. Similarly, TCAC is concerned that there is no clarity about the process whereby collectives of local stakeholders can increase the rate of quarantining. These aspects of the Bill are in opposition to our aspiration for Self Determination and Community Control. The current proposal to maintain rates of income management has created a false sense of security.

3.6. Poverty and Rates of Income Support

Many Aboriginal people in the NT experience the impacts of multidimensional disadvantage including poverty. TCAC present evidence through the Newstart Inquiry that tackles a range of social and environmental determinants of health and wellbeing directly impacted by poverty. TCAC addressed housing, environmental health, transport, energy security, and heat mitigation. These are real issues that need to be addressed through raising the rate. Income Management and the Cashless Debit Card will not address these issues.

4. Conclusion

TCAC opposes compulsory income management and the CDC.

Raising the rate of income support will do far more to tackle the social and environmental determinants of health and well-being. TCAC recommends that the rate of Newstart and Related Payments be increased by a base rate of \$75 per week as a universal first step.

TCAC offers the following recommendations:

- Repeal compulsory income management in favour of voluntary income management;
- Implement a rigorous and independent evaluation of income management;
- Re-invest CDC transition funds to support increased rates of income support;
- Compare CDC POI requirements with those outlined by AML/CTF Act and AUSTRAC;
- Compare Indue standards and code of conduct with ABA/COBA standards and code of conduct;
- Undertake an assessment of the impact of the inability of individuals to access in person banking.



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