



# Australian Council of Social Service

2 April 2020

## **URGENT**

The Hon. Scott Morrison MP  
Prime Minister  
PO Box 6100  
Parliament House  
Canberra ACT 2600

CC: The Hon Josh Frydenberg MP, Treasurer  
E: [josh.frydenberg.mp@aph.gov.au](mailto:josh.frydenberg.mp@aph.gov.au)

The Hon Mathias Cormann MP, Minister for Finance  
E: [Senator.Cormann@aph.gov.au](mailto:Senator.Cormann@aph.gov.au)

The Hon. Ben Morton MP  
E: [Ben.Morton.MP@aph.gov.au](mailto:Ben.Morton.MP@aph.gov.au)

Senator the Hon. Anne Ruston MP, Minister for Families and Social Services  
E: [Anne.Ruston@aph.gov.au](mailto:Anne.Ruston@aph.gov.au)

The Hon. Stuart Robert MP, Minister for Government Services  
E: [Stuart.Robert.MP@aph.gov.au](mailto:Stuart.Robert.MP@aph.gov.au)

The Hon. Greg Hunt MP, Minister for Health  
E: [Greg.Hunt.MP@aph.gov.au](mailto:Greg.Hunt.MP@aph.gov.au)

Senator the Hon. Michaelia Cash, Minister for Employment, Skills, Small and Family Business  
E: [senator.cash@aph.gov.au](mailto:senator.cash@aph.gov.au)

The Hon. Dan Tehan MP, Minister for Education  
E: [dan.tehan.mp@aph.gov.au](mailto:dan.tehan.mp@aph.gov.au)

The Hon. Paul Fletcher MP, Minister for Communications  
E: [minister@communications.gov.au](mailto:minister@communications.gov.au) and [Paul.Fletcher.MP@aph.gov.au](mailto:Paul.Fletcher.MP@aph.gov.au)

The Hon. Angus Taylor MP, Minister for Energy and Emissions Reductions  
E: [angus.taylor.mp@aph.gov.au](mailto:angus.taylor.mp@aph.gov.au)

ACOSS National Member Organisations

Dear Prime Minister,

### **COVID19 Planning and Response**

I refer to my previous letters to you dated Friday 13 March 2019 and Monday 16 March 2020.

ACOSS is continuing to consult regularly with our members, members of the public and other key stakeholders regarding urgent and emerging needs and appropriate actions to effectively respond to the health, social and economic crisis presented by the COVID-19 pandemic.



Thank you for significant announcements made to date, responding to a number of our proposals, including:

- Doubling of JobSeeker Payment and extension to Students
- Extension of Cashflow Assistance to NFPs and Charities
- Inclusion of NFPs and Charities in the JobKeeper wage subsidies
- Evictions Moratorium
- Funding for critical services in a range of areas, including mental health, family and domestic violence, emergency relief, no interest loans, financial counselling and food relief
- Suspension of mutual obligation and CDP and group compliance activities.

We continue to monitor developments and have identified a number of high priority actions, which we will follow up quickly to address with you:

- **Lack of income security** for classes of non-citizens facing destitution
- **Social services in crisis** due to dramatic losses in revenue
- **JobKeeper** legislation, including:
  - Interrelationship with **social security payments**
  - Lack of coverage for **people most at risk of destitution**
  - Eligibility for community sector organisations that have had **dramatic drops in key sources of revenue**, but do not have flexibility with other funding sources due to government or contractual obligations.

In addition, this letter updates you with all our major recommendations, organised by portfolio responsibility.

[Department of Prime Minister and Cabinet](#)

[Department of Finance](#)

[Department of Treasury](#)

[Department of Social Services](#)

[Department of Health](#)

[Department of Education, Skills and Employment](#)

[Services Australia/NDIS](#)

[Department of Communications](#)

[Department of Energy](#)

[Attorney-General's Department](#)



### Department of Prime Minister and Cabinet

1. **Broaden the membership of national advisory bodies** dealing with the Coronavirus response to include the social services sector and community and consumer perspectives, with gender and diverse perspectives.
2. Urgently **designate key social services as “essential services”** by National Cabinet agreement.
3. Authorise government funded human services to have **maximum flexibility in use of funds** to respond and adapt, avoiding job losses and cuts to services. See further below.
4. Write to companies that provide **essential services such as energy, water, finance, rental housing and telecommunications** to ask them to immediately implement three measures to provide vital relief for their customers:
  - a) *No disconnections*: Companies should continue to offer their services without interruption, including energy, telecommunications, banking and insurance.
  - b) *Pause debt collection and legal/bankruptcy proceedings practices*: People shouldn't be evicted or be hassled by debt collectors during this time. Lenders should consider moratoriums on loan repayments.
  - c) *Waive penalty and late fees, including additional interest charges*: No one should need to pay extra if they're struggling to pay bills on time.

### Department of Finance

5. Authorise all Line Agencies to take the following actions across **existing government funded organisations and programs**:
  - a) Extend **all existing funding contracts**, especially those currently ending on 30 June 2020, by at least two years to provide stability and risk reduction for existing services and job losses.
  - b) Urgently **pay all outstanding late payments**.
  - c) **Bring forward future payments** due this financial year, and pay all funds payable under contracts to 30 June 2020 now.
  - d) Commit to restore funding for **the Equal Remuneration Order** implementation where relevant.
  - e) **Authorise organisations to use government funds as they see fit** across all their program and cost centre areas, for at least the next three months, with reporting backwards to account for use.
  - f) **Delay or relax reporting** obligations.
  - g) **Freeze government reform and new tendering** processes.
  - h) Unilaterally suspend KPIs and outcomes to allow for adaptation to new conditions.
  - i) **Remove penalties for non-compliance** with contracts arising from the COVID-19 emergency.



## Department of Treasury

6. We strongly welcome the new **JobKeeper Payment** to support employers and workers to keep people employed during this emergency and urge the Government to remove gaps in this wage subsidy scheme while keeping it simple, fair and quick:
  - a) extend the scheme to **new and temporary migrants, and other non-citizens** who are presently excluded
  - b) ensure that **not for profit organisations that experience substantial revenue losses in one area of operations** (such as NDIS services or social enterprises), and which are not able to cross-subsidise from other funding sources due to service or contractual obligations, receive appropriate and timely support from the scheme so that employees are retained and essential services continue.
7. Ensure that **the JobKeeper Payments and income support system** (including Jobseeker Payment) work together as fairly and seamlessly as possible to provide the income support workers and their families need. This includes access to the enhanced income supports proposed below for JobKeeper Payment recipients, subject to the relevant income tests (see: [Social Services](#)).
8. Ensure that where employers receive JobKeeper Payments, they are passed on in full to relevant employees and that these individual recipients are kept in employment.
9. Ensure Treasury works with ASIC to issue clear debt guidelines that require **debt collectors and other creditors to defer external collection action** for at least 6 months and pause any interest or other fees from accruing during this time. This would apply to businesses that provide essential services, such as energy, water, finance, rental housing and telecommunications, as well as State, Territory and Local governments.
10. Ensure Treasury works with general and life insurance industries, ASIC and APRA to implement the following recommendations of the Consumer Action Law Centre (CALC) in relation to insurance companies:
  - a) **Guarantee coverage even when people are temporarily unable to afford premiums.**
  - b) **Freeze premium increases** for the next 12 months and reduce or refund premiums.
  - c) Act reasonably and flexibly. Insurers should not introduce unreasonable COVID-19 exclusions or policy changes, and should waive people's duty to disclose to their insurer changes in circumstances caused by COVID-19, such as working from home or using their car for delivery services.
11. Introduce urgent measures to **prevent payday lenders and consumer lease providers** from exploiting people in financial hardship during this crisis. With Federal reforms to address problems in the industry having stalled, interim measures are urgently needed.

## Department of Social Services

### *Household Assistance*

12. Extend **income support to asylum seekers, temporary visa holders, New Zealand citizens and other non-citizens** who otherwise do not qualify for income support and are without paid work. It is not possible to rely on charitable support at this time for people to get food and essential items.



13. Ensure that income support is sufficient for people without paid work, or with insufficient paid work. This includes ensuring people in private rental receive enough support to keep their homes, as well as First Nations communities, people with disability, people undertaking caring roles and people without paid work.
14. Suspend **mandatory cashless debit and income management**. There are many instances where people cannot use cashless debit cards for online shopping (for example, Woolworths online), which presents a risk to people needing to isolate.
15. At a bare minimum, all one-off payments and the Coronavirus Supplement should not be quarantined under the Cashless Debit Card or Income Management, but paid directly into people's regular bank accounts. People need maximum flexibility about how they can purchase essential items at this time.
16. Cancel and repay all **unlawful Robodebts**.

### ***Assistance for social services***

We welcomed the announcement over the weekend for additional funding to meet demand in domestic violence, mental health and emergency and food relief. However, there is further demand that has grown and will continue to increase in a number of areas as a result of the health and economic crisis, and which cannot be funded by donations or met with volunteers. It is vital that the Federal Government provide an urgent Community Sector Rescue Package with these components:

17. Extend **all business related measures** to community sector and not for profit organisations. Thank you for those included to date.
18. Create a major **Community Sector Continuity of Service Enabling Fund** to ensure continuity of service delivery, secure jobs, prevent loss of jobs or income, guarantee paid special leave for all workers, enable ramp up of services for people in need, and ensure that services can adapt and remain viable to assist with recovery from the pandemic. Many services have experienced significant losses in the areas of donations and volunteers, as well as in other major sources of revenue and personnel.
19. Urgently **provide program level funding to all DSS funded community services** that rely on individual funding arrangements to stabilise workforces and enable adaptation.
20. Provide **additional funding to housing, homelessness**, accommodation and residential services to secure suitable and safe self-contained accommodation for people who are living in overcrowded housing, sleeping rough or residing in boarding houses or residential or group home services.
21. Guarantee access to **Personal Protective Equipment** and other essential supplies, including Food Supplies to ensure basic needs are met, as set out above.
22. Urgently designate community services that are "essential services" as advised above.

### ***Disability Employment Services***

23. Pause mutual obligation requirements relating to Disability Employment Services that place people at risk until the virus is contained and emergency restrictions are lifted. Subject to risk assessments, participants may continue to engage in safe employment and training-related activities (not requiring face-to-face contact) on a voluntary basis, but this should not be compulsory. This includes requirements to apply for jobs until such time as employment and vacancies improve substantially. Participants in programs should be clearly informed of



this change. Administrative arrangements should urgently be updated (including removal of automated appointments and payment suspensions) to reflect this policy change.

### Department of Health

24. Immediately **expand access to Medicare for all temporary migrants** (including asylum seekers) to protect their health and the health of the community.
25. Immediately expand Medicare funded telehealth services so that all patients can access the general, specialist, mental and allied health services they need, including those provided by **community health services**.
26. Cover the subsidy of residential care residents who spend in excess of 52 days away from the facility.

### Department of Education, Skills and Employment

27. Pause **mutual obligation requirements** that place people at risk until the virus is contained, including in jobactive, ParentsNext and Transition to Work. Work for the Dole, and Youth Jobs Path employability training and internships should be suspended. Subject to risk assessments, participants in jobactive, ParentsNext and Transition to Work and similar programs may continue to engage in safe employment and training-related activities (not requiring face-to-face contact) on a voluntary basis, but this would not be compulsory. This includes requirements to apply for jobs until employment and vacancies improve substantially. Participants in these programs should be clearly informed of this change. Administrative arrangements should urgently be updated (including removal of automated appointments and payment suspensions) to reflect this policy change.
28. Ensure **continuity of funding in education and employment services** with individualised funding models (including jobactive) that are experiencing reductions in client numbers for a variety of COVID19 related reasons, through program/block funding or other approaches. Services should receive sufficient support from governments to ensure they do not have to reduce staff numbers, hours or pay.
29. Measures should be put in place now to ensure that as many people as possible have access to paid employment during the emergency period, and that unemployment, and especially long-term unemployment, is reduced as the labour market recovers. These measures include:
  - a) **Real-time labour market intelligence** and coordination at national and regional levels, so that people are quickly matched to opportunities as they arise.
  - b) **Support for additional paid employment opportunities at the local level** to assist at-risk households (such as older people and people with disabilities, people with chronic illness and homeless people) to adjust to COVID restrictions (including, for example, care and support services and logistics).
  - c) **Sustaining employment services and adapting their roles to changed circumstances**, including a greater role in connecting participants with other services locally and keeping in touch with shifts in local employment opportunities as they occur.
30. Urgently consider **bringing forward and adjusting reforms to employment services**, consistent with the Employment Service Expert Panel's proposals, as may be required to take account of the new circumstances. This should be done in consultation with



organisations representing program participants, as well as relevant peak bodies and experts.

31. Ensure **continuity of funding for early childhood education and care services** by continuing to pay Child Care Subsidy payments to child care services whether they remain open or close due to COVID 19, either because of infection, a significant reduction in enrolments or inability to staff the service.
32. Waive the **gap fee for parents who remove their children from child care** for COVID19 related reasons.

### Services Australia/NDIS

33. Urgently establish a **DSS/Services Australia Advisory Group** including ACOSS and other expert stakeholders to deal with what will be ongoing issues, and properly fund these organisations (including ACOSS) to respond to this crisis.
34. **Immediately boost Centrelink staff by 15,000** to respond to telephone calls to ensure people can access information about their payments during this time.
35. Establish a single hotline to access income support.
36. Implement a **broad communication campaign** to advise people what they need to do to access income support, ensuring it is appropriate for Culturally and Linguistically Diverse and Aboriginal and Torres Strait Islander communities. This should be done in partnership with community organisations. Our consultation to date confirms that few community organisations, including ACOSS, have been approached to support a large scale communications strategy.
37. Allow **people to confirm their identification online** instead of via phone.
38. Remove all requirements for people to **provide documents or attend Centrelink offices** in person.
39. Following suspension of **Community Development Program** requirements in remote communities, clearly inform participants about the suspension. Move quickly to revise Centrelink IT and administrative arrangements to prevent anxiety and confusion among participants that their payments may be at risk.
40. Ensure continuity of support for people with disability and people accessing home care packages. This will include:
  - a) **Provisions for replacement of support workers with no financial penalty.**
  - b) Access to **NDIS plan variations** if new or additional supports are required.
  - c) Plans to manage support provision if the person with disability or older person contracts COVID-19.
  - d) Plans to manage support provision if support workers contract COVID-19.
41. Ensure that there is **Personal Protective Equipment** available for support workers who provide support to older people and people with disability, including NDIS workers, aged care workers and Homecare workers, and their clients.
42. Provide funding for **improved infection control training** for workers.



## Department of Communications

43. Work with NBN Co and the Minister of Finance to enable NBN to **offer targeted low-cost broadband for households eligible for income support payments**, including Jobseeker Payment, pensions, Parenting Payment and student payments, as well as Special Benefit recipients of the Commonwealth Health Care Card and low-income families eligible for Family Tax Benefit Part A. This proposal is fully outlined in ACCAN's [No Australian Left Offline](#) policy proposal.
44. Fund and work with State and Territory governments and the telecommunications industry to offer a **relief package of basic telecommunications equipment** for households without functional equipment, or who require additional equipment to meet the needs of school age children.
45. Establish a **free telephone service for people with low digital literacy** to receive direct technical and skills support.
46. Ensure that **people can connect by phone with Services Australia and employment services** without charge.
47. Provide **support for community service providers** facing difficulties transferring to or scaling up virtual services. Many providers have limited capacity and are having difficulties offering telehealth or other virtual services to vulnerable clients.
48. Work with the telecommunications industry to add to their positive initiatives so far by:
  - a) Ensuring all customers, including pre-paid customers with expired credit, have ongoing data, free access to important telehealth services and government health information, My Gov and Centrelink websites, education platforms and services, and employment services, particularly for people with only pre-paid mobile services as a way of staying connected.
  - b) Implementing measures to address telecommunications drop-outs in remote and very remote communities, in consultation with affected communities. This could include upgrades to software, providing more satellite phones as a back- up, or prioritising voice over data.
  - c) Assisting Telstra to make **their WiFi enabled payphones free during this time**, targeting the needs of homeless people.
  - d) Imposing a moratorium on disconnects, late fees and penalties and on debt collection referrals and collections, for all consumers.

## Department of Energy

49. Work with retailers and the social sector to develop a plan to **deliver temporary, targeted energy hardship support to minimise the accumulation of energy debt**. This package should:
  - a) Be delivered in conjunction with and funded by the Commonwealth Government.
  - b) Be delivered through the most simple and effective avenues. This may require energy retailers to be intermediaries and potentially involve the assistance of state governments. Energy retailers are well-placed to help administer targeted bill relief because they have knowledge of and access to their customers, they already administer government support to customers who need it, and they will benefit through prevention of unsustainable debt accumulation and customer retention.





- c) Be targeted to support an expansion of payment assistance and hardship support.
  - d) Be triggered by stages in government responses to the COVID-19 pandemic.
  - e) Be contingent on participating energy businesses committing to a minimum set of requirements for hardship support, debt recovery and disconnections.
  - f) Be accompanied by accountability measures to ensure government funds are delivered as intended.
  - g) Be accessible for those served through embedded networks and by exempt retailers.
50. Support **energy businesses to increase or recover capacity for customer support**, while at the same time creating local jobs, through subsidising the immediate increase of Australian-based call centre capacity, system expansion and retraining. As with hardship support measures, government funds to support this would be contingent on energy businesses committing to minimum requirements and accountability measures.
51. Support immediate measures **to improve energy efficiency** for those who are required to stay home during the crisis, such as more efficient space heaters, draft sealing kits, and support for advice services to help people adopt energy efficient decisions and behaviours.

#### **Attorney-General's Department**

52. Urgently finalise the new **National Partnership Agreement on Legal Assistance Services**, noting that the current agreement expires on 30 June 2020.

May I again offer ACOSS support for the Federal Government's efforts to respond to this pandemic, including for coordination and communication purposes in response to this unprecedented crisis.

We will be writing separately to responsible Ministers with our proposals and engaging with Departmental officials.

Yours sincerely,

Dr Cassandra Goldie  
CEO, ACOSS