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Small Business and Consumer Division
The Treasury
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Submission to the Regulatory Impact Assessment of Fees for Paper Billing

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing Australia's culturally and linguistically diverse (CALD) communities and their organisations. FECCA provides advocacy, develops policy and promotes issues on behalf of its constituency to Government and the broader community. FECCA strives to ensure that the needs and aspirations of Australians from diverse cultural and linguistic backgrounds are given proper recognition in public policy.

FECCA supports multiculturalism, community harmony, social justice and the rejection of all forms of discrimination and racism so as to build a productive and culturally rich Australian society. FECCA's policies are developed around the concepts of empowerment and inclusion and are formulated with the common good of all Australians in mind.

FECCA welcomes the invitation to provide views on options to improve outcomes and protections for consumers who pay paper billing fees.

Recommendations

FECCA recommends that Government and businesses:

1. Undertake the following policy option, as outlined in the Consultation Regulation Impact Statement: Option 2: prohibition (ban) on paper billing fees.
2. Recognise the linguistic diversity of Australian consumers and the diversity of digital literacy and barriers to digital bill access.
3. Take into account the recommendations made by organisations who represent CALD Australians, such as FECCA, and appropriately accommodate the needs and preferences of these communities with regard to receiving bills.
4. Communicate clearly and strategically with ethnic communities via trusted networks, such as SBS Radio, or advocacy and support groups such as FECCA, and ensure that important information relating to bills is available in community languages or accessible through a free translating service

5. Implement a comprehensive strategy that improves awareness of digital bills, and makes it easy to transition from paper to digital, if an individual decides to do so. This strategy should be equitable and accessible to all Australians, regardless of their cultural or linguistic background.

Key Message

The move towards the provision of bills in a digital format is of interest and concern to FECCA because it will have an impact on how CALD communities engage with businesses and service providers. Some consumers are forced to pay paper billing fees out of necessity, because they do not have the ability or means to access digital bills. Consumers may also pay for paper bills because a physical document allows them greater ability to receive in-language support. For example, a bilingual worker, translator, or family member could help with understanding the bill and the information contained within. It is important that any reforms adequately consider, and tailor responses accordingly, access and equity issues so that vulnerable consumers are not punished, financially or otherwise, for their preferred mode of bill receipt. Multicultural access and equity embodies the notion that everyone can access programs and services, regardless of their background, and in their preferred mode and language.

Overview

FECCA recognises that the provision of bills in a digital format is a simpler, more convenient, and environmentally friendly option that is of a lower cost to businesses. However, many CALD individuals, such as older migrants, are excluded from digital initiatives and services. A range of options must be provided to prevent vulnerable consumers from being detrimentally affected by business practises that exploit their vulnerability.

In 2016, FECCA published a report entitled '[Digital Access and Equity for Multicultural Communities](#)'. This discussed the Australian Government's move towards digital service delivery and its impact on CALD communities. It found that while many individuals of CALD backgrounds such as skilled migrants, young migrants, and those with good English language skills, were able to adapt to digital programs and services, some migrant cohorts struggled to access online services and processes because these did not cater to a range of digital literacies or English language proficiencies. This latter group often depends on family or community members for internet access, or are totally excluded from digital contact and service delivery due lack the confidence, technical skills, or financial ability to easily access the internet.

Where webpages are only available in English or are particularly text dense, Australians with low written English language proficiency can struggle to interact. Websites should utilise simple, clear, plain English instructions together with symbols or images that facilitate effective and swift communication. Translated webpages can be of use when they are easy to locate and the translation is accurate and culturally appropriate. However, some migrants may have low reading proficiency in their preferred language so it is important that links to alternative interpreter or bilingual support services are also provided.

Conclusion

FECCA recognises that there is an increasing need for businesses and service providers to be utilise digital bills. However, the diverse needs of CALD consumers must be taken into consideration, and possible gaps in digital literacy and access be managed carefully. Of the policy options analysed in the Consultation Regulation Impact Statement, FECCA recommends a ban on paper billing fees as these can have a negative impact on CALD

communities that already experience barriers to access. Individuals who are unable to transition to digital bills should not be punished financially as a result.

FECCA would be glad to contribute in more detail on this matter as we are interested in improving the experiences and outcomes for CALD community members. For further information please contact FECCA Director, Dr Emma Campbell, on emma@fecca.org.au or 02 6282 5755.