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Enabling Digital by Default
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Digital by Default

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 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's consultations have revealed community concern about the push to move government services online and the speed of reforms, particularly given the barriers facing CALD communities in accessing information and services in this way. FECCA highlights the need for the consideration of accessibility issues regarding the online provision of information and service delivery.

The use of online platforms

FECCA acknowledges the benefits of online service delivery, including utility and efficiency. However, reform in this area should be carried out progressively and to ensure that vulnerable groups are catered for. We thank the ATO for acknowledging that there are different needs and concerns with regard to the transition to digital services.

Reforms in digital service delivery need to have a component aimed at empowering consumers. Many users of digital platforms make use of this technology on behalf of others, for example older people or people without computer literacy. This phenomenon must be acknowledged, as there are significant policy considerations such as privacy and confidentiality.

FECCA has received some feedback from community members who positively regard the shift towards online service delivery, however these views were qualified by an acknowledgement of previous technological experience and equipment. Those who gave

positive feedback also emphasised the importance of having alternative means of accessing services and information.

The development of online platforms and policies should be done in coordination with other Government agencies under the Digital Transformation Agenda. Coordination will allow agencies to share learnings from other platforms which can inform future processes.

Barriers to accessing online services

There are many barriers for people from CALD backgrounds in accessing the online space. Language is a major barrier, with self-service options for many online government services unavailable in languages other than English. Providing clearly identified information online in community languages, utilising interactive technologies to improve the experience for non-English speakers such as the ability to hover over text and access a translation can be ways to make information and services available to people who are not literate in English. However, agencies should take into account that many individuals are also not literate in their own language.

Accessing services online is particularly difficult for many newly settled migrants and refugees, who may not have any experience using computers. Additionally, they do not have ready access to the required equipment. Some new arrivals need a significant amount of training and support before developing computer literacy and functional knowledge of government systems.

The complexity of online services is a barrier for many who seek to access information and services online. Some participants in FECCA's consultations have highlighted that navigating government websites can be difficult, even for those who speak English as their first language.

Privacy concerns with regards to accessing government services online have been raised with FECCA, particularly with *myGov* where access to a number of services is available through one portal. Migrants and refugees may have lived in a country where the government is not trustworthy and thus are wary of anything which puts all of their personal information in one place. While *myGov* does not centralise the storage of an individual's information on one service, this information is not communicated well to the public.

Penalties

The consultation paper says that penalties may apply "if you are required to use digital services and have the ability to do so, however continue to deal in paper". The meaning of "ability" in this context needs to be clarified. Access to technology does not mean that an individual has the capacity to use online platforms. If there are penalties for not using digital services, there must be specific safeguards to ensure that people are not wrongly penalised

Tailored support and assistance

The consultation paper states that the ATO will provide tailored support and assistance to those who have difficulty in moving to digital services.

FECCA's consultations with multicultural service providers have revealed an interest in training for consumers on the use of digital services in places where these consumers feel comfortable (for example, a community centre that they visit regularly). Service providers have also expressed an interest in detailed training materials about the use of digital services which they could utilise to provide training sessions to the communities that they work with.

The roll-out of *myGov* shopfronts and annual ATO Tax Help program are positive developments, however FECCA believes that more targeted assistance for CALD communities is required.

Exemptions

We are pleased to see that the consultation paper recognises that some members of the Australian community will never be able to transition to digital services, and thus exemptions are important. “Cultural or religious reasons” are identified as a common reason that people may find it difficult to move to digital services. This description does not cover important barriers such as language proficiency and literacy.

According to the paper, those who are unable to transition to digital services will be granted an exemption. Exemptions must be easy to access for those who need them. The process for being granted an exemption outlined in the consultation paper (relying on the individual contacting the ATO to let the agency know that they cannot use digital services and the reasons why) is problematic for many members of the CALD community. This will need to be communicated effectively with vulnerable communities.

FECCA recommends that the ATO analyse and understand patterns in the granting of exemptions to improve the system based on reported barriers.

As identified above, many new migrants struggle with using digital services in their first few years of settlement. FECCA suggests that the ATO consider implementing a transition process for new migrants and refugees, in consultation with settlement service providers.