

Hello,

In this submission I would like to address five major issues with the digitization of government services: availability of traditional alternatives, user-friendliness, security, general customer inquiries and service reliability.

For your convenience, I have summarized my recommendations regarding these issues, on the final page of this document.

The Importance Of Maintaining Traditional Services

Even though we are in an age where internet access and electronic communication could not be more commonplace, the government needs to remember that internet facilities are **not** an acceptable replacement for traditional government services, for many of its citizens.

Many Australians, particularly of older generations, do not have internet access. Many have strong security concerns about viruses and hackers that make them unwilling to submit personal information through their computers. Many are not sufficiently computer literate to be able to interact with government services through a computer. Many, while somewhat computer literate, view computing more as a 'hobby' and find the idea of personally managing their important affairs over a computer daunting. Many simply cannot afford the internet and/or a computer - particularly with the steep rise in the price of internet services associated with the NBN.

No doubt there will be numerous other reasons why digital government services are inappropriate for certain citizens.

I feel I need to emphasize that, while many of the people who prefer traditional services might technically be capable of accessing and even using a digital substitute, forcing them to do so would cause them immense distress that, I believe, the government should not dismiss lightly. Technophobia is a real and serious condition and the anxiety and distress it can cause is equally serious. By and large, it is not a problem that can be remedied by 'simplifying' interfaces or bolstering security protocols, as the causes of technophobia are often more to do with the nature of computers/the internet and the idea of conducting important business in a manner that is completely foreign to a consumer who is more accustomed to human-to-human interaction. I feel the government needs to be ever considerate of this significant emotional cost that digital services have to many of the citizens it is elected to care for, many of whom will be quite vulnerable.

It is essential that the government maintains a non-digital alternative for every single service that it, or one of its departments, offers. It is also important that these non-digital alternatives are not unreasonably inefficient, slow, or unreliable, compared to their digital versions.

It is also essential that the government continues to maintain real-person assistance for all government departments, who are able to assist consumers with any business they might have. This specifically includes maintaining an adequate presence of walk-in offices (e.g. Centerlink), within reasonable travelling distance from the vast majority of consumers, where consumers can have face-to-face meetings with servicepeople who will be able to help them. Of course, the disabled must also be considered and an adequate supply of house-call servicepeople must also be maintained, for consumers who aren't able to travel to a public office.

The government should not allow the strong shift of Australians moving from traditional interaction with the government, to digital interaction to become an excuse to create a staff and/or resource shortage crisis amongst its traditional service offices. Yes, with more and more people on the internet now, there is less and less need for traditional services. But the traditional services are still needed by many people! Just because those people are quickly dwindling into the minority does not mean they ought to be left with a broken, underfunded system of confused, over-burdened servicepeople who are unable to help them in a timely manner, if indeed they are capable of helping them *at all!* Neither should they be condemned to ride a beaurocratic merry-go-round of having to deal with many differant services, to handle what ought to be a simple matter.

One particular point that I feel I need to emphasize is that government customer servicepeople **must** be given the ability to manage any government business on behalf of a consumer, if that consumer would be able to manage that business themselves over the internet.

I once had a conversation with a customer of a certain bank. This bank offers numerous security features for their credit cards that are not enabled by default. This customer I spoke to had been interested in enabling these security features, but the catch was that these features could only be enabled, by the customer alone, over the bank's internet banking app or website. This was problematic as, for reasons that were their own, this particular customer had never used internet banking and had no desire to start using it.

When this customer spoke to the teller at their local branch about having these security features applied to their card, the teller told them that she did not have the power to enact the features herself and that, if the customer wasn't willing to begin banking over the internet, they would be unable to get the security features applied to their cards, period.

It is wrong that the bank does not offer a non-internet avenue for its customers to be able to control the security features of their credit cards and it would be equally wrong for the government to leave **any** of its public services inaccessible to anyone who is unable/unwilling to access it by internet. The 'front line' customer service team should **always** be able to help, or otherwise be able to direct the consumer directly to someone else who is able to help. The customer should never be left all alone with no lifeline except a government website which, to them, is useless.

With each and every digital service the government offers now, and will offer in the future, the people in charge **must** ask "What's the offline alternative?" I believe that this question must be drummed into the government and all its public service departments to the point of becoming a catchphrase, or company motto that they apply to everything they do. "What's the offline alternative?"

Every service, and every *aspect* of every service must have an offline alternative, and that alternative must be well-tested and reliable. There should not be any gaps for the people who are unwilling or unable to log on to a government website to fall into and be forgotten.

One other, important considderation that must be applied to the offices that manage traditional service, is that they serve not only to tend to the needs of those who prefer or need traditional service, but also as a backup for the newer digital services. In the event of a massive system failure or a website crash, traditional walk-in offices, call centers and pen-and-paper forms become the public's only means of accessing these important services.

Such breakdowns, while rare, are unfortunately inevitable and thus the government needs to make sure that traditional services maintain the capacity to handle the elevated workloads they will experience, when these breakdowns occur.

User-Friendliness

One of the considerations very noticeably (and very inappropriately) missing from this inquiry's terms of reference is "user-friendliness". User-friendliness is an **essential** requirement for the success of any digital operation. This is especially true for government services, where the operations at play behind the scenes are often convoluted and confusing and where complicated by-laws, ect. often effect the user's experience. These hassles are bad enough, but they shouldn't be compounded by a difficult-to-understand or difficult-to-navigate user interface.

Following on from my previous segment on people's preference for traditional services; many people who would be willing to 'have a go' at a digital service will quickly be turned off by a non-user-friendly interface and will revert back to handling their government business in the traditional manner.

Familiarity is an important aspect of user-friendliness, and this is of the utmost importance for consumers who are new to computing, or newly transitioning to a digital service from a more traditional one. It is important that digital services be designed to resemble the traditional versions that the consumers are used to, both in terms of style and format, and in terms of procedure. If "Page 1" of a paper government form began by asking the consumer their name, address, DOB, ect., and "Page 2" began by asking the consumer their medical history, the digital equivalent of the form shouldn't muddle the order of these lines of inquiry, else it might disorient or confuse people more used to the traditional procedure.

Similarly, there should not be a significant change to the content of a form, when transitioning from traditional to digital. e.g. a digital equivalent of a certain paper form should **not** ask a bunch of questions that were never on the original paper form, or that are significantly different from questions on the paper form. Making major changes while digitizing forms will have a tendency to confuse consumers and make them wonder if they've somehow logged on to the wrong form by mistake.

As I've previously mentioned, the government must be ever mindful of those who are only barely computer-literate, or not very confident about using their computers to manage their government affairs.

Maintaining familiarity is extremely important for both input (forms which the consumer has to fill in for the government) and output (letters/receipts the government sends to the consumer). Many computer users are familiar with the concept of phishing and may well be suspicious and concerned about receiving an email receipt which bears no resemblance to the paper receipts they have thus-far been used to. Others may simply be confused if the format deviates from what they are used to. We are not all geniuses; particularly when it comes to deciphering messages sent by the government beurocracy.

I feel I should note that maintaining familiarity is not just important when transitioning from traditional-to-digital, it is equally important when transitioning from an old version of a digital service to a new one. One notable example of a failure in this regard is the ATO's transition from it's old "e-Tax" program for filling out NSW tax forms online, to it's new

“myTax” website which is supposedly meant to perform the same service, yet looks and functions in a completely different manner. Sadly, the ATO eliminated the e-Tax system just one year after it’s confusing alternative came into operation.

I am fairly computer savvy, but I am not so savvy at navigating the workings of the ATO. Because e-Tax was sufficiently similar in layout to the traditional paper form, it was easy to use it to replicate the process of filling out the paper form. myTax’s radically different format, on the other hand, left me lost and confused. myTax locked me in to a procedure I didn’t understand by asking me questions about my financial situation and, based on those answers, built a customized ‘tax form’ that bore no resemblance to the paper form I used for reference. I could not make sense of this new ‘form’, and hence I was unable to fill it out.

Subsequently, I have since reverted back to filling out and snail-mailing paper tax forms, after numerous years of filling out my tax forms digitally via the e-Tax system. If the government wishes to encourage a digital relationship with it’s citizens, then developing the myTax system and abolishing the e-Tax system was most certainly a step in the wrong direction, from this citizen’s point of view.

I feel I also ought to address a major concern I had about myTax, even before my failed attempt to use it:

myTax **forces** it’s users to adopt a “prefilling” service, in which numerous boxes on the form are automatically filled out with data the ATO believes they ought to contain. This service was present in the e-Tax system as well, but in e-Tax, it was always **optional!**

I tried this service out once during my years of using e-Tax, and found it to be woefully inaccurate. However, at least then, I had the ability to discard the e-Tax form that had been contaminated with inaccurate (“prefilled”) numbers and start a brand new form that I could be sure contained only reliable numbers that I had typed in myself.

Thus, I’m sure you can appreciate my apprehension in approaching the myTax system for the first time, knowing that it was likely to be contaminated from the get-go with unreliable figures and therefore not being able to trust that I was sending the ATO a reliably accurate form, based on my own accurate figures.

This example demonstrates just a few of the user-friendliness issues that will discourage a citizen like myself from choosing a digital government service over it’s traditional, non-digital alternative.

One other aspect of user-unfriendliness I feel I need to address is the “*Are you a human?*”, or “*Prove you aren’t a robot*” tests that are often applied to forms on government websites. Typically, these tests consist of having the website user retype a distorted, nonsense word, or picking out a set of commonplace objects - such as traffic signs - from a lineup of photos.

While these tests have come to be a routine nuisance for experienced internet users, I have found that their inclusion on government websites can be extremely confusing, and therefore intimidating, to people who are less experienced in traversing the internet.

When I place myself in their shoes, I can understand their difficulty. The purpose of the test; the reason it exists, tends not to be well explained on the forms they are present on. Subsequently, it is easy to appreciate why a computer novice, with no awareness of what ‘bots’ are, nor the trouble they cause for many website hosts, might be deeply confused and

troubled by why the government wants them to type out a nonsense word as part of their form completion process.

Worse still, these tests can often be so poorly rendered that even a person who has good eyesight and is experienced with the tests can have no hope of properly rewriting the test word(s). I myself, an experienced internet user, probably flunk out on no less than 20% of such tests that I encounter. This is annoying for someone who is experienced with the process. I can only imagine the distress it must cause to someone who can't understand the motivation for the test, is confused as to what they are *'doing wrong'* when they fail, and cannot understand why the government is rejecting their efforts to do their business, based simply on their inability to repeat a nonsense word.

In worst-case scenarios, where the website is poorly designed, failing the test can completely reset the entire form – in other words, erasing all the work the user has done and forcing them to start from scratch. This can be immensely frustrating at best (for experienced users), and immensely distressing at worst (for novices); one can appreciate how a novice user might worry about *'where all that information they typed in went to'*, if it didn't get properly transmitted to the government department in question.

Another problem with these tests is that when they are applied to forms that may take a long time to complete (e.g. longer than 10 minutes), they have a habit of "timing out", meaning that even if the user properly completes the test, they will be treated as if their answer was incorrect and the process will be reset, potentially resetting all the previously-filled in data on the form as well. This can also be immensely confusing for novices, who won't appreciate that the test relies not only on their accurate copying of the test word(s), but also on completing the test in a timely manner from their loading of the webpage.

I think the government needs to reevaluate the necessity for these *"Are you a human?"* tests on their websites and, if they determine they are indeed a necessity, develop a far more user-friendly and well-explained mechanism that achieves the same end, without being so intimidating to computer novices.

Security

As noted in your terms of reference, security, particularly the security of one's privacy, is of the utmost concern with any digital service that handles, transmits or receives personal data.

In other words, there are three main areas that the government needs to maintain focus on, in terms of insuring the security of their digital services:

- That the interface between the citizen and the service (e.g. a government website, mobile app, other software, ect.) utilizes a secure transmission protocol that prevents the citizen's data from being intercepted during collection or transmission.
- That the government databanks that store the citizen's data are protected as securely as possible against hacking.
- That the government employees who have access to the data in these databanks exercise this privilege with integrity.

The government must insure that it's commitment to insuring security in all of these fields must never be aloud to lapse.

The field of internet security is an ever-changing one; essentially it is a perpetual ‘arms race’ between the good guys and the bad guys. Although retaining state-of-the-art security might be seen as a nuisance ongoing cost and the government might therefore be tempted to ‘cut corners’ for the sake of saving a few bucks, the government needs to appreciate the risks in allowing digital security to lapse and must commit to maintaining an excellent standard of security on all its digital services.

The government ought to maintain a constant partnership with the best providers in the digital security field, and should strive for a standard of integrity at least as good as the major banks, if not better.

General Customer Inquiries

A problem that I’ve personally struck on several occasions and across several government departments is the lack of an effective email-based help system for general queries.

One of the biggest nuisances I’ve encountered in this regard is government departments’ ridiculous over-use of “privacy concerns” as an excuse not to answer general queries that in no way pose a risk to my privacy.

To clarify, when I say “*general query*”, I am talking about a query that pertains to the rules and procedures of a government department (all of which ought to be public record) and do not involve the disclosure of any consumer’s private details, including my own.

For example, queries such as:

“Where your form asks for an address, does that mean the person’s current address, or their address at the time of the incident?”

“If an insurance company paid off part of the cost, does that amount need to be noted on the form? And if so, in which box?”

“You told the effected residents they would get a letter to explain the situation in full. When do you expect to mail those letters off?”

“Does your service allow people to nominate their organ donation wishes?”

...are what I would consider ‘general queries’. Note how none of them request the service to disclose any personal information to the inquirer, merely an explanation of their rules and procedures.

While I have not asked these particular questions to any government department, I have asked questions that likewise required merely an explanation of government procedure, not any confidential information, and had such queries shut down due to “privacy concerns.” These have, on at least one occasion caused me considerable and needless difficulty and stress in my dealings with government departments.

An effective, **email-based** general query service should be a mandatory element for all government departments that deal with the public, for several reasons:

1. Emails can be sent and read at the sender/recipient's own convenience.
2. Emails allow a consumer to collect their thoughts and make sure they are asking everything they need to ask and are asking the proper questions for their situation.
3. Emails can be read and re-read repeatedly and carefully, so that the consumer can clearly understand what the government department has said to them.
4. Emails provide a written and printable record of what the consumer and the government have said to one another, which the consumer can refer to, and lean on in the event that there are complications in their dealings with said department.
5. The **piece of mind** that the above item offers, even if there are no problems with the consumer's dealings with the government.
6. Emails remain available for reference not merely when the query is asked, but also at the time when a consumer might need to act on the circumstances that the query pertained to. (e.g. If a person asks a question about how to fill in a form, they might not have enough free time to fill in the form until later. If the delay is significant, they may not properly remember the instructions they were given when they *do* have time to fill in the form.)
7. Emails can contain links to specific web pages relevant to the consumer's query. Specific web page URLs tend to be quite long and thus conveying them in any format other than email can be difficult and time consuming.
8. Emails can reduce the 'accent barrier' in an interaction between a customer serviceperson and a consumer. Many non-native Australians write English well and may speak it fluently, but also have thick accents that make them difficult to understand in real-life or phone conversations. Similarly, some people are difficult to understand due to speech impediments or a habit of 'fast talking'. A means of eliminating this accent barrier will naturally reduce any confusion that might otherwise occur in conversations between consumers and servicepeople.

As previously mentioned, the operation of government departments tends to be convoluted and confusing, even to very savvy citizens. They are also fraught with incidents of messing up their customers' affairs and causing those customers a great deal of stress and anxiety as a result.

The stressful and confusing nature of dealing with government departments virtually necessitates a more patient form of communication, such as email, as an alternative to a phone-based or face-to-face customer service model. It allows for the collecting of thoughts, for clear, thoughtful expression and allows people to understand what's being said to them at their own pace. It also offers essential piece of mind to anxious and easily-confused customers, by offering us written records of our answered questions, which we can keep.

As noted in the previous segment of this submission, I respect the need for government services to safeguard the personal data of their consumers. But the government's

overwhelming misuse of the term “*privacy concerns*” in their customer query departments has all but made the term meaningless.

Answering general queries about government rules or procedures is not a threat to anyone’s privacy. Therefore, there is no legitimate security reason for the government not to offer an email service that can answer such queries.

Service Reliability

In light of the collapse of the census website last year on census night - not to mention the collapse of government websites such as the myschool website and the “do not call” register mere hours after they were opened, nor the collapse of the ATO’s website a few days into this year’s tax season just when many people were hoping to do their taxes - I think it’s fair to say the government does not have a great track record when it comes to ‘going digital’.

I don’t have anything to say here that isn’t blindingly obvious; the government **needs to do better!**

Sites like Google, Youtube, Facebook, Netflix, Instagram, Twitter, Steam and Microsoft (just to name a few) have been able to create internet infrastructure that is able to comfortably handle massive, constant, simultaneous nation-wide loads of internet traffic for years. Clearly, it can be done. So why can’t the government do it?

I suggest the government consults with companies, like those mentioned above, who have become experts in managing massive volumes of internet traffic, and find out how they’ve built their massive digital machines that work smoothly under such pressure.

It makes no sense to build a digital service for the nation, if that digital service can’t *handle* the nation. Australia has 24 million people; the government needs to think big when it comes to digitizing; ideally by taking a page from those who have done it before.

Thank you for reading this submission. Once again, please find a summary of my recommendations on the final page.

I hope you take these points into serious consideration as you plan out the digital future of the Australian government’s various departments.

Kind Regards,

Chris Hamill
Australian Citizen & Voter

29/09/2017

Reccommendations:

1. **Always remember that not everyone is a computer whizz!** Make this fact a consideration in every digital project the government embarks upon.
2. Insure that there is a non-digital alternative to every service (and every *aspect* of every service) that the government offers it's citizens.
3. Commit to maintaining adequate funding and staffing for traditional government services, as they cannot be entirely replaced by digital services.
4. Make user-friendliness a top priority of all digital government services. Ideally, digital services should be tested in this regard before being rolled out - perhaps by focus groups of people with poor computer literacy.
5. In the spirit of user-friendliness: commit to maintaining familiarity as much as possible in digital services; both in terms of digitizing traditional services, and in terms of upgrading or 'facelifting' existing digital services.
6. Develop a better alternative to the existing "*Are you a human?*" tests, that is non-threatening and non-confusing to computer novices.
7. Maintain your commitment to safeguarding the personal data of consumers who use your digital services - as it is being collected, as it is being transmitted, and as it is stored.
8. Insure that every government department has an email-based (or similar) customer service system that can answer general queries about their rules, procedures and customer's obligations, in a timely manner.
9. Consult with the companies who handle massive volumes of internet traffic on a constant basis to understand how to build digital services able to withstand massive traffic loads and hacking attempts.