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C R Hingee  
10 Eildon Place  
DUFFY ACT 2611

28 January 2000

Mr David Hawker  
Chairman  
House of Representatives Standing  
Committee on Economics  
Parliament House  
CANBERRA ACT 2600

Dear Sir

I understand that you chair a parliamentary committee examining the issue of identity fraud.

As a previous Privacy Contact Officer for one of the largest Commonwealth Departments, I have some misgivings about how easy it is to get hold of tax file numbers and then use them fraudulently.

Attached is correspondence I have been having with the Child Support Agency which uses TFN numbers as correspondence reference numbers. I would appreciate your confirmation that this issue is one of those examined by the parliamentary committee. The Agency seems to be quite dismissive of my concerns and I feel that this attitude leads to complacency and increases the likelihood of TFN numbers being obtained and used fraudulently.

Yours faithfully

C R Hingee

C R Hingee  
10 Eildon Place  
DUFFY ACT 2611

25 February 2000

F Bismi  
Complaints Officer  
Child Support Agency  
Locked Bag 9815  
Parramatta NSW 2123

cc Chairman, HoR Standing Committee on Economics

Dear Sir/Madam

Re: Your letter ref C 595179 of 9 February 2000.

I refer to your letter of the 9 February 2000 concerning my complaints relating to inappropriate use of tax file numbers as reference numbers for correspondence.

Once again I do not accept your rationale used to support the use of tax file numbers as reference numbers on correspondence. The fact that it may have received "all party support" does not impress me. I have worked long enough in government and with government ministers to know what that means. Similarly, the fact that the arrangements were "made in consultation with the Privacy Commissioner" does not mean that the Privacy Commissioner agrees with the arrangement. I know from personal discussion with the previous Privacy Commissioner that he in fact had great concerns about the TFN numbers becoming a de-facto Australia Card.

I attach a copy of a recent article in the "Canberra Times" of 7 February 2000. I would appreciate it if you could give me your categorical assurance that the practices your agency uses in respect of TFN numbers does not contribute in any way to the increased level of identity fraud and the ease at which false identities are established. Considering the amount of correspondence your agency is responsible for, are you willing to tell me that none of this goes astray?

I look forward to your response with interest. I intend to forward a copy of it to the David Hawkins, Chairman of the HoR Standing Committee on Economics.

C R Hingee

## Tax-file-number C.T. 7/2/00 fraud to be quizzed

A. parliamentary committee will examine this week the issue of identity fraud, highlighted by the recent Audit Office report which found there were 3.2 million more tax file numbers than Australians.

The chairman of the House of Representatives standing committee on economics, David Hawker said it would examine issues of identity fraud and the effectiveness of the tax file number system, at hearings in Sydney on Thursday.

Mr Hawker said the Australian Bankers' Association, major banks, the Australian Transactions and Analysis Centre and the NSW Registry and Births, Deaths and Marriages would all give evidence.

He said the report had also revealed almost 200,000 potentially duplicated TFNs on issue. The inquiry would examine the increasing levels of identity fraud in Australia and the ease with which false identities could be established.

# Child Support Agency

Helping parents manage  
their responsibilities

2-12 Macquarie St Parramatta 2123

Telephone: 131 2172

Facsimile: 93546996

9 February 2000

Mr Cedric Hingee  
10 Eildon Place  
DUFFY ACT 2611

Dear Mr Hingee

Thank you for your letter dated 28 January 2000 I regret that you do not accept the explanation I provided in the last response and wish to add a few words in response to the tax file number issue.

In introducing the Child Support Scheme, the Government decided to use the Australian Taxation Office (ATO) as a national collector of child support, given that the ATO already had existing contacts with employers who would be heavily involved in the collection process and because the ATO had experience in enforcing payment of debts.

It was also recognised that there would be a need for a unique personal identifier for clients involved with CSA and the Government accepted the use of an already established system i.e. tax file numbers(TFN) was appropriate. These arrangements were made in consultation with the Privacy Commissioner and the fact that this proposal received all party support in the Parliament is now a matter of public record.

It is also interesting to note that the ATO has other roles in using tax file numbers as unique identifiers, for example in the Higher Education Contribution Scheme. It forms part of a responsible Government to effective client management.

I hope this clarifies the issue.

F Bismi  
Complaints Officer

10 Eildon Place  
DUFFY ACT 2611

28 January 2000

F Bismi  
Complaints Officer  
Child Support Agency  
Locked Bag 9815  
Parramatta NSW 2123

Dear Sir/Madam

Re: Your letter ref 595179 of 21 January 2000.

I refer to your letter of the 21 January 2000 concerning my complaints relating to inappropriate use of tax file numbers as reference numbers for correspondence.

Firstly, I do not accept your apologies for the time taken to answer my letter of 18 October 1999. This is not the prompt service promised in your "Client Charter", especially as I had to remind the CSA that this matter was still outstanding on 20 December 1999. The CSA on the other hand often demands responses "within 14 days of the date of this letter".

Secondly, I do not accept the explanations given for the use of tax file numbers as reference numbers for correspondence. As a previous Privacy Contact Officer for a large government department, I am well aware of the increasing use of tax file numbers for purposes for which its introduction was never intended. I am disappointed that the Privacy Commission has not prevented the spread of this type of use of TFN's and regard it as an abuse of the system.

The arguments used to support your case as outlined in paragraph 5,6,7 and 8, are spurious and designed simply to make things easier for your Agency. I am not aware of any other Agency using the same process. It would be a relatively simple matter to use reference numbers which can be data matched. In a letter incorrectly addressed to me by the CSA of 26 October 1999, the CSA said "Correspondence from the Child Support Agency does not refer to your Tax File Number, but rather it is referred to as your client number". This is a most patronising statement; any normal person can recognise a tax file number no matter what kind of name you choose to call it by.

The facts are that you are using a tax file number as a correspondence reference, your Agency is not part of the Taxation Department, no other agency (as far as I am aware) feels a need to follow a similar procedure to yours, the CSA sends out large volumes of correspondence and forms thus increasing the chances of tax file numbers being exposed to others, and there are many cases of mail going astray. I, myself have recorded numerous occasions of mail being delivered to me when it was addressed to people in other suburbs, and I have had mail dropped into my postbox by others to whom it was delivered. Only two weeks ago my next door neighbour had her tax refund notice delivered to someone else and the letter was opened and then re-directed back to her. Your process opens the tax file number system to privacy abuse.

The tax file number system was introduced after a proposal to have an Australia Card met strong resistance. Your Agency is now doing the same thing by default as the proposed Australia Card.

Incidentally, the letter I referred to by the CSA of 26 October 1999 which commented on the use of tax file numbers was incorrectly addressed to my brother instead of me. The CSA apologised for this in a letter of 7 January 2000 and said "the officer who misaddressed the letter has been spoken to". Whether in fact any such action was taken I do not know, but I suspect not. To my mind privacy issues are taken far too lightly by agencies such as yours and the use of them as correspondence reference numbers just goes towards proving the point. Naturally, I will not use the number in correspondence back to the CSA which simply destroys its purpose.

I have no faith in the CSA Client Research Unit doing anything in respect to this issue (I suspect it is a bit like Internal Affairs Unit of the police force or the complaints area of the CSA) so I will pass a copy of this letter and your letter to the Privacy Commissioner in the hope that he/she will be able to do something more constructive.

I would appreciate your acknowledgement of receipt of this letter.

Yours faithfully

C R Hingee

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21 January 2000

Mr Cedric R Hingee  
10 Eildon Place  
Duffy ACT 2611

Dear Mr Hingee

Thank you for your letter of 18 October 1999 about your contact with the Child Support Agency (CSA). I apologise for the delay in responding to you.

In your letter you expressed concern that CSA staff identify themselves only by their Christian name when they contact you by phone. CSA staff do not identify themselves by stating that they are calling from the CSA until they are sure that they are speaking with the intended client. By revealing that they are CSA staff to the person who answers the phone they may be inadvertently disclosing that there is a child support case involved. Telephone contact is the most effective form of contact between the CSA and its clients. It is therefore essential that proof of identity checks are done at the outset of a conversation.

CSA staff are however required to identify themselves to a client in such a manner that the client would be able to contact the CSA at a later date, and the officer be identified immediately by branch, team and title. For this reason, staff surnames are not always provided by staff to clients.

It is in the interests of clients and of the larger community that the CSA takes the utmost care to ensure the security, of client information. The CSA's procedures are in line with the provisions of the child support and privacy legislation and safeguard personal information the CSA is entitled to obtain.

With regard to the use of tax file numbers on statements, this provides an effective means of identifying the CSA client concerned. As a child support liability is a debt due to the Commonwealth this is considered an appropriate use of an individual's tax file number.

This form of identification is particularly important where a payer has more than one case. Each client has a single account even though they may make payments on multiple cases. Clients are therefore identified through their tax file numbers when the CSA allocates payments to their accounts.

The statement of account has a detachable payment advice slip which includes a barcode. This barcode contains the tax file number as well as the amount due and where the payment is to go when it is received in the Australian Tax Office or the CSA. A visible tax File number and barcode is required on these payment advice slips as clients have a number of payment options. The bar code is used for clients who pay through Australia Post by Billpay while the tax file number is used for payments made by cheque or money order and is needed to reconcile the payments manually.

By including the tax file number, the CSA is able to accommodate the needs of a wide range of paying parents and ensure that payments are credited to child support accounts in

a timely manner. Further, as statements are produced automatically, it would be impossible to meet individual requirements.

I appreciate your concerns with regard to safeguarding your own privacy. Your comments regarding a potential privacy breach as a result of tax file numbers being used on assessment letters have been forwarded to the CSA's Client Research Unit for consideration in future reviews of the administration of the child support scheme.

I trust this information is of assistance.

F Bismi  
Complaints Officer