



**Australian Government**  
**Services Australia**

## **Program Protocol**

### **Data matching between Services Australia and National Disability Insurance Agency**

#### **Mobility Allowance**

#### **Continence Aids Payment Scheme**

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# 1. Description of the Program Protocol

## 1.1 Purpose

The purpose of this program protocol is to:

- identify the matching agency and the source agency.
- detail the direct relationship of the program to the performance of the lawful functions or activities of the matching agency.
- set out the legal basis for any collection, use or disclosure of personal information involved in the program.
- outline the objectives of the program, the procedures to be employed, the nature and frequency of the matching covered by the program and the justifications for it.
- outline the technical controls proposed to ensure data quality, integrity and security in the conduct of the program.
- outline the nature of the action proposed to be taken in relation to the results of the program.
- indicate what form of notice is to be given, or is intended to be given to individuals whose privacy is affected by the program; and
- specify any time limits on the conduct of the program.

## 1.2 Requirement for a Program Protocol

The Office of the Australian Information Commissioner's (OAIC) *Guidelines on Data matching in Australian Government Administration (Data Matching Guidelines)* specify that a program protocol be prepared by agencies conducting certain data matching programs. These guidelines are voluntary but represent the OAIC's view of best practice. Services Australia (**Services Australia**) complies with the Data Matching Guidelines.

Services Australia's Privacy Policy outlines how a person may lodge a complaint about how Services Australia has handled their personal information, and also outlines how Services Australia will deal with such a complaint. Services Australia's Privacy Policy is available at [servicesaustralia.gov.au/privacy](https://servicesaustralia.gov.au/privacy)

## **2. Description of the Program**

### **2.1 Summary of the Program – Mobility Allowance**

Under section 1038 of the *Social Security Act 1991*, Mobility Allowance (MOB) is not payable to a person who is receiving a funded package of support from the National Disability Insurance Scheme (NDIS) as per 1.2.5.40 Mobility allowance (MOB) - description in the Social Security Guide ([dss.gov.au](https://dss.gov.au)).

MOB is a payment to assist with travel costs for people with a disability, illness or injury who are working, studying or looking for work and can't use public transport.

In July 2016, an automated data exchange process between Services Australia and the National Disability Insurance Agency (NDIA) was implemented to identify MOB customers who are not eligible for this reason, and to stop payment.

This automated process involved Services Australia exchanging with the NDIA relevant details of MOB customers (including name, date of birth and address), and matching these details to identify customers receiving both MOB and an NDIS package of support.

The automated data exchange has been impacted by recent NDIA information and communications technology (ICT) changes, which mean it is no longer effective for some customers, and Services Australia does not receive relevant information to stop MOB in these cases.

An interim manual data exchange process has been implemented for NDIA to securely share relevant data with Services Australia while the automated legacy data exchange process is enhanced by NDIA and Services Australia.

The information to be transferred includes only information already held by the NDIA. Services Australia is not collecting additional information from customers for the purpose of the exchange or data matching.

The NDIA data will only be matched against existing MOB customer information held by Services Australia, to enable a relevant match. MOB payment will be cancelled to prevent overpayments (or to prevent further overpayments where the cancellation takes effect retrospectively). Prior to cancellation of MOB, the customer will be notified and provided with the opportunity to adjust the information and provide supporting evidence. A cancellation letter will be issued to the customer advising the reason for the cancellation and the appeals process.

The NDIA data includes relevant customer information including name, address and date of birth, but will not include other sensitive information including medical conditions. A full list of information is outlined in Appendix A below.

Matching of NDIA data with Services Australia records (including customers receiving MOB) will occur within Services Australia systems, such as the Enterprise Data Warehouse.

Any storage and access of selected manual extract data for MOB will be consistent with Services Australia's data control requirements.

### **2.2 Summary of the Program – Continence Aids Payment Scheme (CAPS)**

The Continence Aids Payment Scheme (CAPS) provides eligible people with severe and permanent incontinence a direct payment to help with the purchase of continence aid products.

Services Australia administers payments under the CAPS legislative instrument on behalf of Department of Health and Aged Care (DHAC).

As per the *Continence Aids Payment Scheme 2020* instrument made under the *National Health Act 1953*, for a NDIS participant, where a NDIS plan is in effect and the NDIS plan includes continence aids as part of their consumables budget, the NDIS participant is not eligible to receive CAPS.

Initially there was real time data exchange between NDIA and Services Australia to automatically cancel and automatically notify CAPS customers who were in receipt of an NDIS package with a consumables budget. This automated data exchange has since been impacted by recent NDIA ICT changes, which mean it's no longer effective for some customers that have transitioned to the new NDIA PACE platform, and Services Australia doesn't receive relevant information to cease CAPS in these cases.

An interim manual data exchange process has been implemented for NDIA to securely share relevant data with Services Australia while the automated legacy data exchange process is enhanced by NDIA and Services Australia. The interim work around solution is to:

- Ensure eligibility information is provided with the intention to mitigate CAPS overpayments to customers who are receiving continence aids products in their consumables package with NDIA
- Enable Services Australia to meet its legislative obligations in making the right CAPS payments
- Remain in place only until a full solution is implemented.

The interim work around solution will require NDIA to re-confirm from their shared data with any active CAPS customer as to whether a customer's plan includes continence aids products.

This will support the CAPS legislative eligibility requirements and would help in mitigating the risk of CAPS customers being paid by both Services Australia and NDIS.

The information shared by the NDIA will include information already held by the NDIA, i.e. Services Australia will not be collecting additional information from customers for the purpose of the exchange or data matching.

The NDIS data received will be matched only against existing CAPS customer information held by Services Australia, to enable a relevant match. CAPS customers' entitlement will be ceased to stop overpayment. A cancellation letter will be issued to the customer manually advising the reason of the cancellation and appeals process.

The NDIA data will include relevant customer information including name, address and date of birth, but will not include other sensitive information including medical conditions. A full list of information is mentioned in Appendix A below.

Any storage and access of selected manual extract data for Continence Aids Payment Scheme (e.g. for Quality Assurance) will be consistent with Services Australia's data control requirements.

## 2.3 Objectives

The key objectives of the data matching are to assist Services Australia to:

- Identify whether customers in receipt of Mobility Allowance have been granted funded support from the National Disability Insurance Scheme and then where this is the case, take action to cancel the Mobility Allowance entitlement
- Identify whether customers in receipt of Continence Aids Payment Scheme have been granted a consumable budget that includes continence aids from the National Disability

Insurance Scheme and then where this is the case, take action to cancel the Continence Aids Payment Scheme entitlement.

- The manual data matching process will provide Services Australia with information to make decisions on MOB and CAPS eligibility.

## **3. Agencies Involved**

### **3.1 Source Agency**

NDIA is the source agency involved in this program.

The data provided to Services Australia will be provided by the NDIA.

### **3.2 Matching Agency**

Services Australia is the data matching agency.

### **3.3 User Agency**

Services Australia is the primary user agency. Services Australia will receive the source data from the NDIA and will then match it to Services Australia's own data.

## **4. Data Issues**

### **4.1 Description of the data**

The data is provided by the NDIA to Services Australia in the form of a password-protected CSV file. For a full list of the data elements provided by NDIA, refer to Appendix A.

The data provided will include records of active or exited participants from May 2024. The list will be refined when data is matched with the Services Australia CAPS and MOB recipients.

### **4.2 Data Quality**

The data provided to Services Australia by the NDIA is sourced directly from NDIA systems.

Services Australia, as the matching agency, will match the data to achieve the objectives stated in Part 2.3 of this protocol.

#### **Mobility Allowance**

The Services Australia data teams will cross-reference records with MOB customers to verify the accuracy of the data match.

Services Australia's experience in matching similar data with the same matching criteria shows an extremely low number of instances of incorrect identity matching. Services Australia has a well-established process to address any instances of incorrect matching to reduce or eliminate potential privacy impacts.

If there is any doubt about the correctness of a particular identity match, the data is forwarded to a specialist area within Services Australia for further checks to be undertaken.

Where a match is made (and verified), Services Australia will contact the customer, cease MOB payment and send a cancellation letter.

## **Continence Aids Payment Scheme**

The Services Australia data team will cross reference the NDIA data with the CAPS customers in the Medicare system. If required, further investigation will be undertaken with NDIA to determine whether continence aids products/supports are included in their consumables budget.

Where a match is made (and verified), Services Australia will cease CAPS payments and advise the customer by sending a cancellation letter.

## **4.3 Data Integrity**

Services Australia maintains a high level of data integrity. Measures are taken to maintain these integrity levels, including designing systems that will not accept records that are incomplete and identifying and correcting records that have data items that are inadequate or corrupt.

## **4.4 Data Security**

Services Australia will exchange data with NDIA using dedicated secure government channels. This mechanism facilitates the transmission of secure and trusted communications across government.

All data received by Services Australia from the NDIA is held in secure storage databases, within Australian Government data centres. NDIA will share the file using the Sterling file gateway partner, which is a secured and protected platform.

These are Services Australia systems that employ strict security controls. Only Services Australia staff with a business need to access data are able to view the data provided under this program.

Services Australia staff are subject to statutory secrecy and confidentiality provisions, including under the *Social Security (Administration) Act 1999*, the *National Health Act 1953*, the *Public Service Act 1999* and the *Criminal Code Act 1995*. Services Australia is also subject to the *Privacy Act 1988*. Access to Services Australia's computer centres is strictly controlled and limited to authorised staff.

Services Australia's security system provides protection and control of dataset access, system entry and program integrity. Security features include logon identification codes, passwords and security groupings to ensure that access to information is on a need-to-know basis only. In accordance with existing security arrangements, Services Australia automatically logs user access to data files.

Additional security will be in place for the data received by Services Australia as part of this data matching process, with data to be quarantined in a separate Services Australia database, up until data matching occurs with access strictly limited to officers required to facilitate the delivery of this program.

# **5. The Matching Process**

## **5.1 Data Exchange Process**

MOB and CAPS cannot be paid to customers receiving an NDIS funded package of support.

Services Australia data matching with the NDIA to support MOB and CAPS will occur through a manual data exchange process.



A manual data exchange process between the agency and the NDIA provides an interim solution to the current issue:

- Customers may be incorrectly paid MOB or CAPS, which could result in the customer being overpaid
- The agency relies exclusively on the data match to identify these incorrect payments.

The manual data exchange process will resolve this issue through:

- Matching of NDIS participant data against MOB and CAPS population data, using key data points including name, date of birth and address.
- Identifying mutual customers receiving both an NDIS package of support and MOB/CAPS.
- Using this information for identified customers to review their continuing eligibility for MOB and CAPS.

## **5.2 Data Matching Process**

As required, NDIA will provide Services Australia with a data file containing a list of individuals who are receiving an NDIS funded package of support.

Upon receipt of the data file, Services Australia performs an identity match of all NDIA records with Centrelink and Medicare customer records, by comparing the following fields:

- Surname
- Given Name
- Date of Birth
- Address lines
- Suburb
- Post code
- CRN (if the customer is also a Centrelink customer).

There are separate identity match processes for the MOB and CAPS programs, each of which may use different combinations of the above fields. The resulting matches are those where the NDIA's data files have the same identity details as Services Australia's customers.

Where an unconfirmed match results, these will be resolved manually. Unconfirmed matches include:

- Multi-matches – this is where the identity could relate to multiple Services Australia records
- Possible matches – this is where the identity match is not certain.

If required, to increase the confidence of a match, the following information will be compared manually by Services Australia staff:

- Surname
- Given Name
- Middle Name

- Preferred Name
- Date of Birth
- Gender
- Address lines
- Suburb
- State
- Post code
- CRN
- CAPS status active
- MOB status current

Once a data match has been confirmed to a high level of confidence, Services Australia will then use the information that has been provided by the NDIA (and information in the customer's Centrelink record or Medicare record, if available), for the purpose of determining eligibility for payment.

A technical standards report can be found at Appendix A.

## 6. Action Resulting from the Program

### Mobility Allowance

Mobility Allowance will be cancelled from the date determined under the Social Security (Administration) Act. This means if the customer received and failed to comply with a notice requiring them to tell Services Australia about specific changes of circumstances, the Mobility Allowance will be cancelled from the date the NDIS plan commenced.

All customers will be contacted to explain the manual data match. Customers may be contacted by either pre-call SMS and outbound phone call, or via a letter if the call is unsuccessful.

Contacting customers by pre-call SMS and letter are standard agency processes for all customer contact. The pre-call SMS alerts the customer to expect a call from Services Australia. It does not otherwise include any personal information.

The customer's personal information will be used during the outbound phone call with the customer.

Services Australia will confirm with the customer if they are receiving an NDIS package of support. If the customer confirms they are receiving an NDIS package of support, Mobility Allowance will be cancelled from the date the NDIS plan commenced.

If the customer is not contactable by outbound call, Services Australia may contact via a letter, requesting the customer to contact Services Australia. The letter advises the customer that Services Australia has attempted to contact them and they are asked to make contact.

If the customer disagrees with the information Services Australia has received from NDIA the customer is able to advise Services Australia staff at any time. The customer can provide supporting evidence to enable further assessment.

Where required, Services Australia may undertake administrative action to recover overpaid payments.

## **Continence Aids Payment Scheme**

Matched CAPS customers' entitlement will be ceased, and a cancellation letter will be created and sent manually. The letter will explain the reason for cancellation and the customer may apply for review of decision. If required the customer may be contacted by an outbound phone call. The customer's personal information will be used during the outbound phone call with the customer.

If a customer disagrees with any of the information Services Australia has received from NDIA, the customer is able to advise Services Australia staff within the appeal period. The customer will be able to provide supporting evidence to enable further assessment.

Where required, Services Australia may undertake administrative action to recover overpaid payments.

## **7. Time Limits Applying to the Program**

The matching of data will commence in 2024-25.

As per the Services Australia Records Management Policy, the data matching tables (the data received from NDIA which Services Australia will use to match against) are stored in a secure folder and handled in accordance with the Archives Act.

## **8. Public Notice of the Program**

Services Australia will notify the public of the program protocol by:

- publishing this protocol on Services Australia's website
- publishing a notice in the Federal Register of Legislation – Gazettes (reference C2025G00207).

## **9. Reasons for Conducting the Program**

### **9.1 Relationship with Services Australia's Lawful Functions**

The program is related to the Mobility Allowance and Continence Aids Payment Scheme.

All information handling by Services Australia in relation to the data matching program will be in accordance with law, including the *Privacy Act 1988* and, to the extent the program involves protected information, the *Social Security (Administration) Act 1999*, *National Health Act 1953* and *National Disability Insurance Scheme Act 2013*.

## **10. Legal Authority**

### **10.1 Services Australia**

Services Australia complies with the *Privacy Act 1988* and Australian Privacy Principles (APPs), the *Social Security (Administration) Act 1999*, the *National Health Act 1953* and the *National*

*Disability Insurance Scheme Act 2013*, in relation to the handling of information about customers and other individuals.

Services Australia will collect personal information (and protected information) from the NDIA and use it to perform the data match for the purposes of administering the MOB and CAPS programs (a use for the primary purpose of collection authorised by APP 6.1).

To the extent the data match will involve the use of protected information held in the Services Australia Centrelink and Medicare database, that use of protected information is authorised as follows:

- (a) for MOB customers, use for the purposes of the social security law (*Social Security (Administration) Act* section 202(2)(d)), and
- (b) for CAPS customers, use for the purposes of the *National Health Act 1953* and the Continence Aids Payment Scheme 2020.

Once the data match has occurred, Services Australia will use personal information (and protected information) to contact customers for the purposes of administering the MOB and CAPS programs (use for primary purpose authorised by APP 6.1). To the extent that contact involves the use of protected information, that use of protected information is authorised under section 202(2)(d) of the *Social Security (Administration) Act* and the *National Health Act 1953*.

## 10.2 NDIA

NDIA will disclose personal information to Services Australia for the purposes of Services Australia administering the MOB and CAPS programs. This disclosure is authorised under section 60(2)(d)(i) of the *National Disability Insurance Scheme Act 2013* (**NDIS Act**). Services Australia's collection and use of the information from the NDIA is also permitted under section 60(2)(d)(i) of the NDIS Act.

## 11. Prior Data Match Programs

In July 2016, an automated data exchange process between Services Australia and the NDIA was implemented to identify MOB and CAPS customers who are not eligible due to receiving a funded package of support, and to stop payment.

The automated data exchange was impacted by recent NDIA ICT changes, which mean it is no longer effective.

## 12. Costs and Benefits

The interim manual data matching solution is to:

- Ensure Services Australia meets the legislative requirements for MOB (under section 1038 of the *Social Security Act 1991*, MOB is not payable to a person who is receiving a funded package of support from the NDIS as per 1.2.5.40 Mobility allowance (MOB) - description in the Social Security Guide.
- Ensure Services Australia meets the legislative requirements for CAPS (as per the *Continence Aids Payment Scheme 2020* instrument made under the *National Health Act 1953*, for a NDIS participant, where a NDIS plan is in effect and the NDIS plan includes continence aids as part of their consumables budget, the NDIS participant is not eligible to receive CAPS).

- Provide sufficient information to help identify cohorts for MOB and CAPS payments; and
- Remain in place only until a full automatic solution is implemented.

The main benefits of this data matching program are government savings and compliance with legislation (accurate administration of MOB and CAPS payments to eligible customers).

The costs associated with taking action in response to matches obtained through this data matching process will comprise staff costs which are absorbed as a service delivery business as usual cost.

## Appendix A – Technical Standards report

### Description of Data

#### Data from NDIA to Services Australia

A data file will be provided by the NDIA to Services Australia, which contains the data elements listed below.

Data Item No.	Data Item Name	Type	Length	Description
1	PrsnWithDsbltyId	Char	10	Unique identifier for a participant, generated by NDIA business system
2	FirstName	Char	40	First name person officially goes by
3	MiddleName	Char	40	A person's name placed after the given name and before the family name
4	LastName	Char	40	Surname person officially goes by
5	PreferredName	Char	40	The name by which a person prefers to be called
6	DateOfBirth	Date	8	Recorded date of birth
7	Gender	Char	50	A description used to record how the person feels, presents and is recognised within the community.
8	AddressLine1	Char	100	First address line
9	AddressLine2	Char	100	Second address line
10	Suburb	Char	50	Suburb / locality
11	State	Char	20	State in which the participant resides
12	Postcode	Char	10	Postcode for the participant's address
13	CRN	Char	20	Centrelink Reference Number
14	LatestPlanEfctvDt	Date	8	Effective date of the person's latest plan
15	LatestPlanExpDt	Date	8	Expiry date of the person's latest plan
16	SourceSystem	Char	3	Source systems for the person's plan, i.e. SAP or SFC
17	FundedConsumableBudgetInd	Num	3	An indicator to indicate if a participant has Consumable budget greater than \$0. Value = 1 if greater than \$0.
18	FundedConsumableBudgetEfctvDt	Date	8	Date for when the person's consumable budget was greater than \$0 as of the latest plan
19	FundedConsumableBudgetExpDt	Date	8	Date for when the person's consumable budget has expired or would expire for the latest plan
20	ExitEfctvDt	Date	8	Effective date for Participant's exit from NDIS
21	ActiveParticipantInd	Num	3	Indicates whether the participant is currently active (access met and has not exited the scheme) and has an approved plan, Value = 1 if the person is an active participant in NDIS.
22	CntncSupplInd	Num	8	Continence Support Indicator. The indicator is available (set to 1, 0 or .) for those with Plan that have budget update or new budget effective from Oct 2024. Value = 1 means the person's plan includes Continence Support within Consumable Budget Support Category Value = 0 means the person's plan does not includes Continence Support If the value = . means no information available (i.e all plans in SAP or those with updates prior to Oct 2024 in SFC)
23	ReportingDt	Date	8	The date of reporting (data as of)

## Matching Techniques

### Identity Matching

Identity matching involves using key data fields provided in external data and comparing these against customer data held by Services Australia. The result of this is establishment of a high-confidence link between external data and customer records held by Services Australia.

Services Australia will undertake identity matching of its customer database against the NDIA data using the following data fields:

- Surname – Mandatory
- First Name - Mandatory
- Date of Birth - Mandatory
- CRN (if available).

Distinct combinations of the above identity fields will be matched against customer data. The process may also highlight matches against address lines, suburb and postcode fields. All data matches will be confirmed manually.

If required, to increase the confidence of a match, the following information will be compared manually by Services Australia staff:

- Surname
- First Name
- Middle Name
- Preferred Name
- Date of Birth
- Gender
- Address lines
- Suburb
- Home state
- Post code
- CRN
- CAPS status active
- MOB status current

The identity matching process will also identify instances of NDIA data matching to multiple Centrelink customer records. That is, where a customer has multiple Centrelink or Medicare customer records, for example due to the creation of records in error.

All records deemed to have been successfully identity matched will proceed to the customer contact and case management process.

## Risks

### Incorrect identity matches

Services Australia uses sophisticated identity matching techniques to ensure that it identifies the correct customer from data provided by the NDIA. This technique uses multiple details to obtain an

identity match. For example, where a name and date of birth are available, all of these items will be used in the identity matching process.

Services Australia applies risk assessment rules to ensure high confidence matches on available data.

Services Australia's data matching rules and techniques are constantly evolving and being refined to ensure risks are being minimised. This is achieved by utilising the learnings of past and present data matching exercises.

## **Data quality controls and audit**

When action is proposed, additional checks will take place to ensure the correct Centrelink or Medicare customer has been identified.

## **Security and confidentiality**

All Services Australia systems are strictly controlled with features including:

- system access controls and security groupings;
- login identification codes and password protection; and
- full audit trails of data files and system accesses.



## **Appendix B – Example of SMS**

*Services Australia Service Officer will call you today from a private number. Please answer this call. Do not reply by SMS.*

## Appendix C – Gazettal Notice



**Commonwealth  
of Australia**

# Gazette

Published by the Commonwealth of Australia

**GOVERNMENT NOTICES**

### **Notice of a Data Matching Program – Mobility Allowance and Continence Aids Payment Scheme**

This notice refers to the data matching program between Services Australia and the National Disability Insurance Agency (NDIA).

This data matching program involves the matching of:

- data provided by the NDIA to Services Australia about individuals who are receiving National Disability Insurance Scheme (NDIS) funded package of support
- Centrelink and Medicare customer data held by Services Australia

for the purpose of identifying whether persons are eligible for Mobility Allowance and Continence Aids Payment Scheme payments.

If individuals are existing Centrelink or Medicare customers, Services Australia will use customer data held in their Services Australia records for the purpose of administering Mobility Allowance and Continence Aids Payment Scheme programs, including to make contact with the individual, verify their identity and determine payment eligibility.

A protocol document describing this program has been developed with visibility of the Office of the Australian Information Commissioner (OAIC). Copies of the document are available from:

<https://www.servicesaustralia.gov.au/organisations/about-us/publications-and-resources/centrelink-data-matching-activities>

Services Australia adheres to the OAIC Guidelines on Data Matching in Australian Government Administration which includes standards for data matching to protect the privacy of individuals. Services Australia's privacy policy is available from:

<https://www.servicesaustralia.gov.au/organisations/about-us/publications-and-resources/privacy-policy>