



11 May 2023

Department of Infrastructure, Transport, Regional Development,
Communications and the Arts
GPO Box 2154
CANBERRA ACT 2601

Dear Director, Postal Policy—Communications Services and Consumer Division

Postal Services Modernisation

The Australian Human Rights Commission (the Commission) welcomes the opportunity to make this submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department) regarding the modernisation of Australian postal services.

The Commission notes the reasons outlined in the ‘Postal Services Modernisation: Discussion Paper’ (the Discussion Paper) for modernising postal services and agrees that actions need to be taken to support the financial sustainability of Australia Post and to meet the needs of contemporary Australia.¹ While this submission will focus on the needs of older people and people with disability, the Commission acknowledges the intersections that exist between different groups and urges the Department to consider the diverse needs of all Australians.

It should be noted that the Disability Discrimination Commissioner, Dr Ben Gauntlett, and Age Discrimination Commissioner, the Hon Dr Kay Patterson AO, are members of the Australia Post Stakeholder Council, which made a brief submission on postal services modernisation.

Non-discrimination and equal access to postal services

Australia is a signatory to the United Nations Convention on the Rights of Persons with Disabilities (CRPD). Article 9 of the CRPD requires state parties to take appropriate measures to ensure people with disability have equal access to public services.² Protections for people with disability and older people exist domestically in the *Disability Discrimination Act 1992* (Cth) and *Age Discrimination Act 2004* (Cth), which prohibit direct and indirect discrimination in relation to accessing goods, services and facilities.³

While recognising the need for modernisation of postal services, the Commission draws attention to the need for Australia Post to ensure that any reforms comply with Australia's international human rights obligations and ensure non-discrimination and equal access to postal services for all Australians.

A sufficiently lengthy transition period is recommended to allow adjustments to be made where barriers to equal access are identified or it is found that certain groups are being disadvantaged by particular reforms. Close monitoring by Australia Post and the Department during the transition period will be critical to ensure no individual or group is left behind.

Clear communication about changes to postal services will be essential and Australia Post should consider a range of communication channels and methods, including accessible formats, in-language and Easy English communications, to meet the diverse communication needs and preferences of its customers.

The 'digital divide' in Australia is a well-documented phenomenon, which refers to populations who are not benefiting fully from the Internet either because they are complete non-users, they are using the internet in a limited way, or they do not have access to internet services.⁴ In its 2021 report, the Australian Digital Inclusion Index puts the percentage of affected Australians as 17% of the total population.⁵ Particular demographics appear more impacted by this divide, for example, 2018 Australian Bureau of Statistics data indicate 1.1 million (28.5%) people with disability had not used the internet in the previous three months (compared to 13% of the total population).⁶ While there is evidence that older Australians are engaging in a notably broader range of online activities across different devices and connecting to the internet more than ever before, many older people continue to feel overwhelmed by technology changes and 38.4% are still not using the internet.⁷ The digital divide also cuts across other demographics including low-income households, new migrants and refugees and First Nations peoples.⁸

The Commission draws attention to the need for ongoing investment to train and support individuals and communities affected by the digital divide to access and use new technologies, including online and self-service options, implemented as part of the modernisation of postal services. Access to low-cost assistive technology aids for people with disability should also be considered.

Adequate face-to-face or phone services should be maintained to support customers who are unable to access or use online or digitised service options.

To date, discrimination complaints relating to postal and delivery services received by the Commission have broadly concerned the physical accessibility of facilities, especially where facilities are in heritage buildings. Others have complained of parcels not being left on premises and delivery persons not allowing sufficient time for a person with

disability to get to the door. Where a parcel has been returned, some have been unable to collect their parcel because of accessibility issues.

The modernisation of postal services should ensure that all retail premises are in compliance with the Disability Premises Standards, and are accessible and age friendly. If changes to the frequency of letter delivery and other changes are applied, viable alternatives should be made available for customers to self-collect or to make specific request for re-delivery. Consideration could be given to a measure which, while protecting people's privacy and safety, allows the postal delivery service to be altered where extra time is needed for someone to respond to a doorbell and receive the delivery.

Supporting Australians in regional and remote Australia

The Commission strongly supports Australia Post's continued commitment to support regional and remote communities, where 58% of its retail services are located.⁹

The modernisation of postal services must encompass forward-planning and consider longer-term social, economic and environmental projections. For example, demographic data about the distribution of Australia's ageing population and related trends, could inform postal services in regional areas where there is a concentration of older residents.

The Discussion Paper highlights the growing role of Australia Post in providing financial services to regional areas, including through Bank@Post.¹⁰ In light of recent bank closures, it will be vital for Australia Post to continue to work closely with the banking sector and affected communities, including older Australians and others who prefer to bank in person or do not have access to online banking.¹¹ For example, people aged 65 and over are five times more likely than people aged 18-29 to use cash during an in-person transaction, so maintaining a cash handling capacity along with passbook services will be important for older Bank@Post customers.¹²

In addition to financial services, the Commission urges Australia Post to engage proactively with business groups and governments at all levels to identify services that are likely to shift online or have a diminished regional presence in the near future. Post offices have historically played an important, trusted role in regional commercial activities, where a post office licensee or agency may also run other businesses such as a newsagency, pharmacy or general store.¹³ Australia Post should consider opportunities to provide expanded services and innovate retail formats, for example by transforming post offices into regional hubs which offer a range of services, to assist governments and businesses to maintain a continuing presence in regional and remote Australia and to ensure communities have ongoing access to these services.

Any innovation in service provision, whether physical or digital, must be age-friendly and accessible. Due consideration must also be given to the safety and privacy of customers and staff. Any modernisation or expansion of services must adhere to the *Privacy Act 1988* (Cth). Australia Post should consider trialling dedicated access times for concession card holders so they can avoid peak service hours, especially for banking and other services involving sensitive private information or transactions. Elder abuse and disability awareness training is also recommended to build the capacity of Australia Post staff to support older customers and prevent financial abuse.

Supporting diverse communities

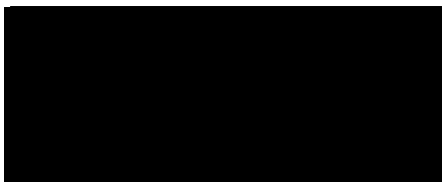
The Commission supports the continued provision of discounts to concession card holders and encourages Australia Post to conduct ongoing review and monitoring activities to ensure that any increase in charges for letters or other services does not disproportionately disadvantage older people or people with disability with limited or no income. For example, the latest National Seniors Social Survey found that 80% of older people have been impacted by increasing living costs, with the number who are severely impacted expected to rise over the next 12 months.¹⁴

The Commission commends Australia Post for its work to date in supporting Australians with diverse needs and in particular supports Australia Post's:

- ongoing implementation of its Access and Inclusion Plan, which takes a comprehensive view of disability as defined in the *Disability Discrimination Act 1992* (Cth) and aligns with the social and human rights models of disability central to the approach of the CRPD.¹⁵
- membership as an Employer Network member of the Commission's IncludeAbility Project, which aims to increase access to meaningful employment opportunities for people with a disability.
- Australia Post Stakeholder Council, which provides a representative forum to receive input from a range of sectors and communities, including older people and people with disability through the current membership of the Age Discrimination Commissioner and Disability Discrimination Commissioner.
- Inclusion policies and practices which are resulting in an increase in employment of older workers and workers with a disability.

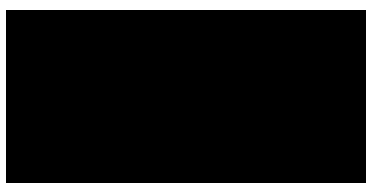
Thank you for the opportunity to make this submission to inform the Department's consultation on modernising postal services.

Yours sincerely



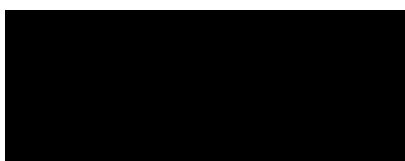
Emeritus Professor Rosalind Croucher AM
President

T: [Redacted]
F: [Redacted]
E: [Redacted]



The Hon Dr Kay Patterson AO
Age Discrimination Commissioner

T: [Redacted]
F: [Redacted]
E: [Redacted]



Dr Ben Gauntlett
Disability Discrimination Commissioner

T: [Redacted]
F: [Redacted]
E: [Redacted]

¹ Department of Infrastructure, Transport, Regional Development, Communication and the Arts, Postal Services Modernisation Discussion Paper (March 2023), accessed 12 April, 2023.
<https://www.infrastructure.gov.au/sites/default/files/documents/postal-services-modernisation-discussion-paper.pdf>.

² Convention On The Rights Of Persons With Disabilities (CRPD) Article 9.

³ Disability Discrimination Act 1992 (Cth), s24. Age Discrimination Act 2004 (Cth) ss17, 28.

⁴ Good Things Foundation, 'The real digital divide? Understanding the demographics of non-users and limited users of the Internet: an analysis of Ofcom data' (June 2017) accessed 20 April 2022,
https://www.goodthingsfoundation.org/wp-content/uploads/2021/02/ofcom_report_v4_links.pdf.

⁵ Australian Digital Inclusion Index (ADII), 'Measuring Australia's Digital Divide: Australian Digital Inclusion Index: 2021' (October 2021), accessed 28 April 2023, https://h3e6r2c4.rocketcdn.me/wp-content/uploads/2021/10/ADII_2021_Summary-report_V1.pdf.

⁶ Australian Bureau of Statistics (ABS), 'Use of information technology by people with disability, older people and primary carers' (July 2020), accessed 12 April 2023,
<https://www.abs.gov.au/articles/use-information-technology-people-disability-older-people-and-primary-carers>.

⁷ Australian Bureau of Statistics (ABS), 'Use of information technology by people with disability, older people and primary carers' (July 2020), accessed 12 April 2023,
<https://www.abs.gov.au/articles/use-information-technology-people-disability-older-people-and-primary-carers>.

⁸ Good Things Foundation Australia, 'Digital Nation Australia 2021 Report' (August 2021), accessed 18 April 2023, <https://www.goodthingsfoundation.org.au/news/digital-nation-australia-2021/>.

⁹ Department of Infrastructure, Transport, Regional Development, Communication and the Arts, Postal Services Modernisation Discussion Paper (2023), accessed 12 April, 2023.
<https://www.infrastructure.gov.au/sites/default/files/documents/postal-services-modernisation-discussion-paper.pdf>.

¹⁰ Department of Infrastructure, Transport, Regional Development, Communication and the Arts, Postal Services Modernisation Discussion Paper (2023), accessed 12 April, 2023.
<https://www.infrastructure.gov.au/sites/default/files/documents/postal-services-modernisation-discussion-paper.pdf>.

¹¹ Australian Government The Treasury, Regional Banking Taskforce Final Report (September 2022), accessed 12 April 2023 <https://treasury.gov.au/publication/p2022-260600>.

¹² RBA Bulletin, Consumer Payment Behaviour in Australia (2019), accessed 11 April, 2023.
<https://www.rba.gov.au/publications/bulletin/2020/mar/pdf/consumer-payment-behaviour-in-australia.pdf>.

¹³ Deloitte Access Economics, Economic and social value of Australia Post (2020) referenced in Modernisation of Postal Services Discussion Paper, accessed 11 April, 2023
<https://www.infrastructure.gov.au/sites/default/files/documents/postal-services-modernisation-discussion-paper.pdf>.

¹⁴ National Seniors Australia, National Seniors Social Survey – Older people and the cost of living: Who's most affected? (2023), accessed 12 April, 2023 <https://nationalseniors.com.au/news/media-release/80-of-over-50s-hit-by-cost-of-living>.

¹⁵ Australia Post, Access and Inclusion Plan 2023-2025 (2023), accessed 2 May, 2023
https://auspost.com.au/content/dam/auspost_corp/media/documents/access-and-inclusion-plan-2023-2025.pdf.