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**From:** Jarrod Kagan [  
**Sent:** Thursday, 11 May 2017 12:29 PM  
**To:** Community Affairs, Committee (SEN)

**Subject:** RE: Senate Centrelink Inquiry - QoNs Sydney Probe Group

Please see below our response to the enclosed letter (and relevant attachments). We have specified various responses that we have provided on a **Commercial In Confidence** basis.

Should you have any queries, please don't hesitate to contact me.

Kind regards, Jarrod

**Question 1**

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Work commenced for the Department on 14 November 2016.

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**Question 2**

We do not conduct collection activity for Payday Lenders.

**Question 3**

There is no industry standard percentage. Commission rates can vary substantially across our client base.

**Question 4**

Only debtors who are not receiving current benefits are referred to us. They must meet the Department's criteria for referral.

Overdue debts remain with the Department and worked internally until day 42 at which point in time, if they meet the above criteria, they are then referred.

**Question 5**

Despite the Agreement specifying recovery performance, there are currently no set KPIs regarding recovery performance.

**Question 6**

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Given there is no KPI or SLA regarding recovery performance, this would not be a basis upon which the Department could terminate.

#### **Question 7**

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Could I kindly request you refer this request to the Department? Given they are a party to the Agreement, I believe it would also require their approval. In any event, given the information contained in the agreement, it would have to be provided on a **Commercial in Confidence** basis (not for the public). **This is a two party agreement that contains confidential information that is not available in the public domain. Firstly, this would require DHS consent. Secondly, information such as our commission rates and other contracted information differs to that of our competitors and we would not want them to see this information. We are a private company operating in a competitive environment and would not want this information out in the public.**

#### **Question 8**

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We currently employ 204 staff in Australia in our Credit and Collections Division. 24 of these are dedicated to the Department work. Could this information kindly be treated as Commercial in Confidence.

#### **Question 9**

The scripting does not require our agents to provide their full name. We have no issue with our agents providing this information however.

#### **Question 10**

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Please find **attached** copy of our scripts. Kindly treat this document as **Commercial In Confidence**. **We see scripting as core Probe Intellectual Property. We would not want our scripting out in the public for any of our competitors to see. We believe we have a unique way of creating a call flow script and the way it is designed to effect the greatest results. We believe the way we train and develop our staff as one of the key differentiators we have.**

#### **Question 11**

Kindly refer to the **attached** documents:

- **16\_SOP\_DHS\_Review\_Hold\_20170227\_V1.1** - Specifically addresses vulnerability
- **14\_SOP\_DHS\_Unique\_Conditions\_20170220\_v1.3** - Unique conditions – deals with scenarios in which debtors threaten self-harm
- **Hardship Procedure** – Generic procedure for financial hardship
- **Hardship Policy** – Generic policy for financial hardship

Could you kindly treat these documents as **Commercial In Confidence**. **Similar to see scripting, we see our Process, Procedure and Training documents as core Probe Intellectual Property. We would not want these documents out in the public for any of our competitors to see. We believe we have a unique operating model and have invested heavily in our compliance regime. We do not want our competitors to see this information.**

### **Question 12**

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Could I kindly request you refer this request to the Department? This request relates to Department data.

### **Question 13**

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If Hardship is identified then the account is statused accordingly and placed on hold. For temporary hardships, we may review the case and the situation again accordingly. We also provide the Department number or may transfer them should the debtor require further information. We also notify the Department as the debtor may be eligible for benefits.

### **Question 14**

Where a debtor has the capacity to pay but not the intention, the consequences could range from the debt being referred back to the Department and:

- The Department issuing of a garnishee on wages;
- Tax refund to repay any outstanding debts;
- Issue a Department prohibition Order which will prevent debtors from travelling overseas; or
- Refer the case to Department solicitors or legal team.

### **Question 15**

Kindly refer to response to Question 14. We would never advise our agents to threaten repossession or legal proceedings by Probe as we do not perform these services under the Agreement.

### **Question 16**

The debt is referred to Probe for a period of 180 days (6 months). If by that time there has been no recovery or an arrangement made with the debtor, the file is then returned to the Department.

### **Question 17**

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We consider this information **Commercial In Confidence**. If required, we would provide this on that basis. **We are a private company and do not want anyone to be able to deduce our revenue. Providing a % of Government work would allow our competitors who provide Government work to engineer or deduce our revenue. We also don't want our competitors to know the % breakup of our clients and which industries we specialise in.**

### **Question 18**

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Debtors may dispute debts. All debtors have a right of review. If a debtor would like to have their debt reviewed, the process involves placing the file on a Dispute status. The debtor is then instructed to contact the Department to request the review.

**Question 19**

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Probe does provide training of what not to say. This includes examples of statements which are misleading and therefore not to be used. Our compliance training also summarises the legal obligations (applicable to all debt collection activity, not restricted to the DHS). This includes examples of what may and what may not be stated within calls.

**Question 20**

We consider this information **Commercial In Confidence**. If required, we would provide this on that basis and of course, with Department approval (given it is a part of a two party Agreement).  
As above, it is a two party agreement that contains confidential information that is not available in the public domain. Firstly, this would require DHS consent. Secondly, information such as our commission rates and other contracted information differs to that of our competitors and we would not want them to see this information. We are a private company operating in a competitive environment and would not want this information out in the public.

**Question 21**

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It does not appear from our records we received these files.

**Question 22**

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Not applicable as per response to Question 21.

**Question 23**

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Not applicable as per response to Question 21.

**Question 24**

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Not applicable as per response to Question 21.

**Question 25**

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Debt Recovery Site is a term used in the Agreement. It is undefined. Could I kindly refer this question to the Department for clarification?

**Question 26**

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Customer Reference Number is the identifier for Department customers.

**Question 27**

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Location for Department debtors is limited to white pages searches and internet searches. We are not permitted to use any paid search engines by the Department.

**Question 28**

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Yes, we have received some claims where this is the first time the Debtor has become aware of the debt. There have been debtors that are no longer receiving Centrelink benefits their address has not been updated. As a result, they have not received the initial correspondence from the Department.

**Question 29**

If a debtor raises that it is the first time they have been made aware of the debt and they have changed their address, we send a general enquiry through to the Department to re-issue the initial letter. The customer is also given time to investigate the matter if required.

**Question 30**

Updated information is sent to the Department via secured portal daily.

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