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The administrative meaning of non-response in digital welfare

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Abstract. Non-response can trigger administrative consequences even when a person's reasons for not responding are unknown. Drawing on qualitative analysis of six published reports, this article focuses on Australia's Robodebt scheme and uses Universal Credit managed migration in Britain as a supplementary comparison. Non-response is analysed as a status relative to a request, channel, deadline and procedural stage. The article distinguishes administrative attributions about a person's understanding or reasons from procedural defaults prescribing what happens when a response requirement remains unmet. In Robodebt, non-response was used to infer acceptance, trigger income averaging or presume the absence of a reasonable excuse. Digital arrangements shifted fact-finding and data entry to individuals and shaped opportunities for explanation. Later requests for help and submissions of information were not always recorded or considered, while confirmation of correct aggregate income could still be followed by assessments based on averaging. Reported revisions changed some defaults and contact requirements without establishing individual reasons. Universal Credit accounts show that anticipated burdens can inform decisions not to claim, and that people may intend and attempt to claim without completing the process. Correcting an attribution, changing a default and securing consideration of later action therefore address different administrative problems. The selected documents clarify these relationships without establishing how common the documented processes are or the net effects of digitisation.

Keywords: non-response, digital welfare, administrative burden, administrative attribution, procedural default

1. Introduction

During the 2015 manual pilot of Australia's Robodebt scheme, income support recipients were asked to discuss tax-authority income information. A draft briefing reported that about 60 per cent had not contacted the Department of Human Services (DHS) within 21 days and interpreted this as possible evidence of informed choice and acceptance of debt. The briefing was not delivered to the departmental secretary. The Royal Commission later rejected its evidential basis[1]: letters might not have arrived and did not explain income

[1] Royal Commission into the Robodebt Scheme, Report (Vols. 1–2), 2023, pp. 123–124, https://robodebt.royalcommission.gov.au/publications/report.

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averaging.

Missing or incomplete responses leave uncertain whether people encountered a request, understood it, tried to comply or decided against doing so. Yet a procedure may already specify what follows. The Commission's distinction between accepting an income figure and understanding its use extends this problem beyond absence: even a completed response must be interpreted in relation to what the person was asked and told.

Administrative burden and exclusion research explains how organisational arrangements and the costs of dealing with the state shape participation [1, 2]. Robodebt scholarship examines behavioural policy's ethical and institutional conditions [3] and connects default judgements, attributed acceptance and obstacles to contestation [4]. Building on this work, the article distinguishes non-response as evidence about a person from non-response as a condition for the next administrative step. Challenging an interpretation of conduct may leave its consequences in place.

The guiding question is: under what conditions do people come to be treated as non-responding in digital welfare procedures, and how do administrative attributions and procedural defaults shape the consequences of that status? *Administrative non-response* is treated as a status relative to a particular request, channel, deadline and procedural stage. Later action raises a further question: whether and how the organisation records and considers a response once it arrives.

The analysis examines Robodebt's recovery of alleged welfare overpayments during the 2015 pilot, subsequent manual programme and online administration in 2016–2017. Universal Credit managed migration, which required recipients of benefits being replaced to make a new claim, supplies a supplementary comparison. These settings allow deliberate choice, incomplete action and the handling of later contact to be examined within different response requirements.

The argument proceeds as follows. Section 2 draws on administrative burden and exclusion research and on accounts of social coordination and agency to distinguish the conditions of responding, administrative attributions, procedural defaults and administrative recognition. Section 3 describes the documentary corpus and analytical approach. Section 4 traces non-response through Robodebt's pilot, manual programme and online procedure, including the recovery fee and the 2017 revisions, and then turns to later action and completed confirmations. Section 5 examines non-claiming in Universal Credit managed migration. Section 6 considers what the findings show about attribution, default and the recognition of action, and Section 7 concludes.

2. Responding, attribution and procedural defaults

2.1. The conditions of responding

A request for information may require a person to recognise its relevance, understand the instructions, obtain documents and complete a prescribed sequence of actions. Administrative burden research connects this work to learning, compliance and psychological costs shaped by programme design and implementation [2]. Baekgaard and Tankink [5] distinguish state actions, experienced burdens and subsequent outcomes. A demanding requirement, difficulty meeting it and non-completion of the required response are analytically distinct. Halling and Baekgaard's systematic review [6] similarly directs attention to both administrative arrangements and individual resources. These accounts support an analysis of how response requirements are constituted, rather than treating the provision of a channel as sufficient opportunity to respond.

Practical capacities affect how a requirement can be met. Christensen et al. [7] theorise the cognitive resources involved in initiating action, remembering deadlines and persisting through difficulties.

Communication design also matters. Bhargava and Manoli's field experiment [8] varied notices and application materials sent to taxpayers who appeared eligible for a tax credit but had not claimed it or answered an earlier mailing. More complex notices and worksheets reduced response relative to simpler versions. Within this selected population, the experiment identifies an effect of communication design while leaving particular non-respondents' reasons unknown. An intention to act and a completed response need to be connected through the work of understanding and complying.

Information must also connect a general requirement to the person's next action. From interviews with 15 successful recipients in Israel, Tarshish and Holler [9] distinguish primary from procedural information, and universal from personalised information. These are separate dimensions. Knowing how to apply differs from knowing how general rules bear on one's circumstances. Their analysis also addresses two-way information flows and feedback. For the present inquiry, this suggests distinguishing being sent information from learning what remains to be done. Because the study recruited recipients of three benefits, its findings leave open whether people who do not obtain those benefits experience similar difficulties and, if so, how.

Organisational exclusion research already addresses the interpretation of absence. Brodkin and Majmundar [1] describe caseworkers judging whether someone refused to attend an appointment or the notice failed to arrive in time. Ms Garcia resubmitted missing documents, but regained eligibility only after an advocate intervened [1]. Both notification and the handling of later action belong within this organisational analysis. In digital welfare, Schou and Pors's study of Danish frontline staff [10] describes assistance needed for self-service tasks. Registration as a digital user could coexist with difficulty using the system.

Contact serves different purposes. Drawing on Scandinavian cases, Lindgren and Madsen [11] extend a distinction between information-related and action-related problems to include needs for technological support, submitting opinions or feedback, and emotional support. Composite vignettes concerning Norwegian benefits illustrate why even digitally skilled people may need explanation or reassurance. A call seeking help may be an attempt to meet a requirement without completing the prescribed declaration.

2.2. Attributing meaning to absence and continuing by default

Christensen et al. [7] propose that difficulty with initiative or deadlines may be misread as insufficient motivation, supporting judgements of undeservingness and rationalising burdensome requirements. Attribution as justification is thus already present in this literature. Ball [3] adds attention to comprehensible communication, individual responsibilities and the institutional setting of behavioural policy. The pilot exchanges below identify another justificatory use: attributing informed choice and acceptance to support proceeding without further contact. Their concern is presumed understanding rather than undeservingness.

Moynihan et al. [4] connect default judgements, interpretations of acceptance and obstacles to challenge through Robodebt's *clawback logic*: the imperative to recover resources regarded as incorrectly distributed. Distinguishing rights-granting from rights-depriving settings, they recognise that state coercion often prevents exit. Their discussion of people continuing through a repayment screen to preserve repayment options already separates compliance from agreement. The cases below extend this concern to confirming correct annual income and supplying the fortnightly earnings needed for assessment.

An *administrative attribution* here is a claim about a person's understanding, acceptance, choice or reasons for conduct. A *procedural default* is an administratively prescribed next step when a specified response requirement remains unmet. It may be automated or carried out by staff. Behavioural-policy accounts discuss default rules in relation to inertia and inattention [3]. The definition specifies the condition for taking the next administrative step, without assuming inertia or inattention or treating inaction as a preference. The same

averaging calculation, for example, may follow either an unanswered request or confirmation of aggregate income. The latter route must be examined as a completed response.

Eickers [12] argues that social coordination need not always depend on attributing mental states, since scripts can guide conduct through expectations about roles and appropriate action. Scripts are not identical to administrative rules. The narrower insight is that acting towards another person and determining their intentions are distinguishable activities: an organisation may prescribe what follows a deadline without resolving why it was missed.

Attributions and defaults can nevertheless be linked through justifications, staff instructions or presumptions determining additional consequences. Non-contact signifying acceptance requires evidence about understanding and choice. Applying tax data after non-contact sets a condition for processing. Presuming no reasonable excuse links non-response to an assessment of reasons. These connections require examination in their documented form, without assuming that every default requires an attribution or that attributions have no administrative effect.

2.3. Action, records and administrative recognition

Recorded statuses can carry consequences beyond the encounter in which they originate. Peeters and Widlak's study of the Dutch civil registry [13] describes difficulties correcting registrations and consequences across organisations using those data. Drawing on a Rotterdam Ombudsman report, they describe Angela, who said she had never received a request to confirm her address and faced several problems following deregistration [13]. Their analysis shows that restoring a registration need not restore the prior situation in each organisation using it [13]. Baekgaard and Tankink [5] also identify the costs of securing administrative action to correct an error. Correction of a record and repair of its consequences thus require separate attention.

The analysis distinguishes *actions and circumstances*, *recorded response status*, *administrative attributions* and *subsequent decisions*. Recorded status means how the documents describe contact or completion, without presuming a common database field or access to complete logs. Help-seeking can be directed towards compliance while a declaration remains incomplete. Attributed acceptance makes a further claim about the person, whereas proceeding concerns the use of the available record. These relationships require evidence rather than forming a necessary causal sequence.

A person can act without changing the next administrative decision. Here, *administrative recognition* refers to whether an organisation records that action and considers it when deciding what remains to be done. It does not mean agreement with the person's substantive claim. Van Langenhove's reconstruction of Harré [14] helps separate the capacity to act from the conditions under which action is permitted and exercised. Skills, tools and assistance help constitute capacities, while a moral order includes beliefs about rights and duties. Nielsen and Nielsen's general-population survey [15] shows associations between perceived burden and anticipated active preparation or contestation in hypothetical encounters. It measures neither actual withdrawal nor exit. These accounts direct attention to action under constraint: evidence that someone sought help or challenged a decision does not establish that their opportunities or influence were adequate.

3. Materials and analytical approach

The article develops a conceptual argument through qualitative document analysis [16]. Six published reports form the documentary corpus: the Royal Commission and Commonwealth Ombudsman reports on Robodebt, the National Audit Office and Public Accounts Committee reports on Universal Credit, and the December

2024 non-claimant study and its technical report[2]. Selection was purposive, based on the availability of procedural descriptions, explicit administrative explanations, individual accounts and information about how these sources were produced. Academic studies provide the conceptual dialogue and published illustrations, rather than additional independently investigated cases.

Robodebt analysis centres on the Royal Commission's account of the pilot and manual programme[3], alongside later procedures, staff instructions and legal findings. The Ombudsman's main text and appendices supply procedural and individual accounts. Printed page references identify passages throughout. Internal emails, briefings and newsletters are accessed through the Commission, not as independently obtained records.

All nine individual accounts in the Ombudsman's main text were examined. Six receive detailed attention: Ms G and Ms B for notification, Mr R for assistance and recording, Ms H for information handling, and Ms D and Mr S for completed responses followed by revised assessments. Ms C illustrates later withdrawal. Supplement S1 records all nine cases' roles and limits, including Ms M's disputed contacts and Mr J's case, which the Ombudsman did not investigate. S2 separates procedural versions.

The February 2024 audit and April parliamentary report examine Universal Credit non-claiming and departmental responses. A separate December study reports a survey of 1,029 former tax credit recipients in England and Wales and 30 follow-up interviews. Although all had missed migration deadlines when sampled, 106 reported having claimed by the survey, leaving 923 non-claimants[4]. Stopping fieldwork at the target number limits interpretation of response rates, while notification screening further selected participants[5]. Supplement S4.2 details sampling and source production.

Interviewees came from consenting survey participants, and the research team's analysis used moderators' summaries[6]. Of four published illustrative cases, with names changed for anonymity, this article uses John, Sara and Anita to examine a considered decision against claiming, unsuccessful attempts to complete a claim and discouraging contact when seeking an extension.

The analytical unit is the handling of a specified response requirement under a particular procedural version. Individuals may appear at several stages. The analysis links claims to source passages, distinguishes actions, recorded status and attributions, and follows subsequent decisions chronologically. Completed

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2 The six reports are as follows: Royal Commission into the Robodebt Scheme, Report (Vols. 1–2), 2023, https://robodebt.royalcommission.gov.au/publications/report; Commonwealth Ombudsman, Centrelink's automated debt raising and recovery system (Report No. 02/2017), 2017, https://www.ombudsman.gov.au/__data/assets/pdf_file/0022/43528/Report-Centrelinks-automated-debt-raising-and-recovery-system-April-2017.pdf; National Audit Office, Progress in implementing Universal Credit (HC 552), 2024, https://www.nao.org.uk/wp-content/uploads/2024/02/progress-in-implementing-universal-credit-report.pdf; House of Commons Committee of Public Accounts, Progress in implementing Universal Credit (HC 458, Twenty-Ninth Report of Session 2023–24), 2024, https://committees.parliament.uk/publications/44438/documents/220821/default/; D. McGrady, J. Roberts and C. Snook, Move to Universal Credit non-claimants (formerly tax credits customers) research (Research Report No. 1082), Department for Work and Pensions, 2024, https://www.gov.uk/government/publications/move-to-universal-credit-non-claimants-formerly-tax-credits-customers-research; and Ipsos, Technical report: Move to Universal Credit non-claimants (formerly tax credits customers) quantitative and qualitative research (Research Report No. 1082), Department for Work and Pensions, 2024, https://assets.publishing.service.gov.uk/media/67601935cfbf84c3b2bcfa43/move-to-uc-non-claimants-formerly-tax-credits-customers-research-technical-report.pdf.

3 Royal Commission, Report, pp. 121–127.

4 McGrady, Roberts and Snook, Move to Universal Credit non-claimants, pp. 19–21.

5 Ipsos, Technical report, pp. 7–8, 28.

6 McGrady, Roberts and Snook, Move to Universal Credit non-claimants, pp. 20–21.

responses, residual debts and revisions check explanations based on non-response. Missing reasons and undocumented links remain unresolved. This document analysis involves no original interviews, access to complete contact logs or reanalysis of survey microdata.

Source assessment distinguishes investigator findings, departmental statements, complainant accounts and this article's inferences. DHS influenced the Ombudsman's discussion of accuracy[7], warranting care with its assessments. Procedural descriptions partly rely on DHS documents, and cases illustrate selected complaints[8]. Shared departmental records do not provide independent corroboration. The survey and technical report likewise describe one study. Complaint and research participation shape whose experiences become visible. Supplement S3 maps principal claims and limits. The analysis does not estimate prevalence, establish systematic national differences or identify the net causal effect of digitisation.

4. Non-response in Robodebt

DHS administered Centrelink payments and compared recipients' declared earnings with employer information held by the Australian Taxation Office (ATO). Tax data gave aggregate earnings over an employment period, often a financial year, whereas entitlements depended on particular fortnights. Averaging distributed the aggregate evenly across that period to calculate fortnightly income and possible overpayment. Correct aggregate earnings could thus produce an inaccurate assessment[9]. The Commission reports that the Federal Court declared in *Amato* that averaged ATO data were insufficient to establish a debt[10]. A response requirement below means an action demanded by DHS, without implying that the demand or resulting debt had a valid legal basis[11].

4.1. A rule and its rationale: the pilot and the manual programme

In the sequence quoted by the Commission, a rule for proceeding was stated before an explicit attribution of acceptance. An email of 24 April 2015 proposed using averaging if people did not respond. On 6 May another email stated that people who did not contact DHS would nevertheless have debts raised. Jason Ryman, a director in the Customer Compliance Branch, replied that people choosing not to contact DHS could be understood as satisfied with the information and the proposed debt calculation process[12]. This sequence does not establish the rule's ultimate origin or its designers' motives. It shows how the reply supplied a rationale for an already stated course of action.

The draft briefing drew its interpretation of non-contact from agreement with tax data among respondents and the few initial non-respondents who contacted DHS after debt notices. This extrapolated across groups and stages. The Commission rejected the inference: Ryman and branch manager Scott Britton knew letters might not arrive, and the letters did not disclose averaging[13]. Recognising aggregate income as correct did not establish understanding of its conversion into fortnightly earnings. Receipt and understanding remained

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7 Royal Commission, Report, pp. 585, 592.

8 Commonwealth Ombudsman, Centrelink's automated debt raising, pp. 1, 33–34.

9 Commonwealth Ombudsman, Centrelink's automated debt raising, pp. 1, 42.

10 Royal Commission, Report, p. xxix.

11 Royal Commission, Report, p. xxv.

12 Royal Commission, Report, pp. 121–123.

13 Royal Commission, Report, pp. 123–124.

separate questions, even without knowing particular non-respondents' reasons.

The manual programme brought this attribution into staff instructions. In early 2016 compliance officer Colleen Taylor challenged an instruction that, if followed, would lead staff to ignore relevant documents already held[14]. The Compliance Help Desk replied that respondents could identify such documents, representing non-contact as awareness that matched data would be applied. The Commission summarises the reply as indicating that staff were not prevented from checking records, but were not expected to. The reply stated: "Basically, the policy is, if the customer does not contact we apply the match data"[15].

Taylor argued that most former recipients did not receive the letter because they had moved, and questioned their capacities to explain circumstances and seek review. The Commission calls these concerns well-founded but reports no consequent amendments[16]. A competing explanation was available within DHS, yet challenging informed choice did not suspend the instruction to apply matched data.

4.2. Continuing without a response: the online procedure

In the Online Compliance Intervention (OCI) of July 2016–January 2017, initial letters allowed 21 days from their date to confirm employment income online. Letters went through myGov, an account for government services, or to the last-known postal address. People without myGov had to create an account. Until 20 January 2017, letters omitted the compliance helpline number[17]. The Commission describes this as a conscious decision informed by "behavioural insights" to force online response[18]. Accessing the prescribed channel became part of the task.

The individual cases show conditions hidden by a simple record of non-response. Ms G reported that, after receiving debt communications, she found Centrelink letters in a myGov account set up only for Medicare use. She said that the debt notice arrived shortly before childbirth and that caring for a sick newborn delayed dealing with it. DHS stated that it had used her nominated electronic channel. She emailed on 14 November 2016, after which a customer service officer made one unsuccessful attempt to contact her. On 2 December the debt was automatically referred for external collection because no repayment arrangement had been made. Reassessment later reduced the debt from A$2,914.20 to A$610.07[19]. The referral concerned repayment at that stage, rather than the earlier requirement to confirm income.

Ms B said letters went to her parents' address, where she had not lived for years, while she was overseas. DHS reported using her last-known address and sending a text. Reassessment reduced A$1,441.64 to A$267.51, including a recovery fee[20]. Neither case independently verifies delivery. Both distinguish sending through a recorded channel from the person's account of encountering a notice, and both ended with residual debts.

The procedure could continue while these circumstances remained unknown. A reminder followed 14 days without online activity. Without action by its due date, the system averaged ATO earnings over the employer's

[14] Royal Commission, Report, p. 126.

[15] Royal Commission, Report, p. 127.

[16] Royal Commission, Report, p. 127.

[17] Commonwealth Ombudsman, Centrelink's automated debt raising, pp. 9, 33–36.

[18] Royal Commission, Report, p. xxvi.

[19] Commonwealth Ombudsman, Centrelink's automated debt raising, p. 10.

[20] Commonwealth Ombudsman, Centrelink's automated debt raising, p. 10.

reported period. Where this produced a debt, a notice and ordinary recovery followed[21]. The described sequence included no intervening step to establish why online action had not occurred. Non-completion could determine the calculation while its cause remained unresolved.

Attributions persisted online. A November 2016 staff newsletter represented confirmation of matched data as a decision to accept it unchanged, and instructed staff not to search existing documents unless the person indicated that relevant information had already been supplied. The Commission regarded this as confirming Taylor's account[22]. The distinction concerns uses of conduct within procedures, rather than a manual phase with interpretation and an online phase without it.

Averaging also followed completed confirmation of ATO income. Incomplete information could leave part of a period to be averaged. Information outside automatic acceptance tolerances could be referred to staff. If still unverified and considered unreasonable, it could be replaced with ATO data[23]. These different routes to the same calculation mean an averaged assessment alone reveals neither response status nor understanding.

4.3. Presuming reasons: the recovery fee and the 2017 revisions

The 10 per cent recovery fee gives a more direct example of a default linked to an attribution. As summarised by the Ombudsman, the statutory provision concerned debts arising wholly or partly from a refusal or failure to provide income information, or from knowingly or recklessly providing incorrect information. It included an exception for a reasonable excuse. The relevant conduct concerned the earlier reporting of income, rather than merely failing to answer the new review letter. OCI asked whether personal factors had affected the person's ability to declare income correctly. Answering no, or failing to answer by the date the debt was raised, led to automatic application of the fee. Answering yes prevented automatic application[24].

A sample initial letter dated 6 August 2016 illustrates two uses of non-response in the same communication. It said DHS would update income details using the enclosed information if online confirmation was not supplied by the deadline. It then stated: "If you do not respond, it will be assumed no reasonable excuse applies"[25]. Present non-response thus supported a presumption about reasons for past conduct and an additional financial consequence. DHS reported that initial letters explained the reasonable-excuse exception only from August 2016[26].

The Commission found no evidence that thought had been given to the grounds for adding the fee. It identified in subsequent internal legal advice an assumption that an averaged debt implied failure to meet reporting obligations, and stressed the need for compelling evidence of a breach[27]. Improving opportunities to answer the question could not, by itself, supply that evidence.

In early 2017 DHS added the compliance helpline, extended the initial response period to 28 days from receipt and expanded manual intervention, including registered mail, calls and address searches. DHS said it would refer a non-respondent's OCI debt externally only if satisfied that the person had received the notice

21 Commonwealth Ombudsman, Centrelink's automated debt raising, p. 34.

22 Royal Commission, Report, p. 173.

23 Commonwealth Ombudsman, Centrelink's automated debt raising, pp. 35, 42–43.

24 Commonwealth Ombudsman, Centrelink's automated debt raising, pp. 43–44.

25 Commonwealth Ombudsman, Centrelink's automated debt raising, p. 54.

26 Commonwealth Ombudsman, Centrelink's automated debt raising, p. 8.

27 Royal Commission, Report, pp. xxv–xxvi.

but was ignoring it[28]. This specified additional conditions without establishing receipt or disregard in every case.

The revised provisional assessment warned that ATO data would apply if the result was not accepted within 14 days, potentially producing debt. Acceptance prevented further online entry, although formal assessment or review remained available through DHS[29].

The Commission reports that ministers sought an early 2017 change under which the personal-factors question would default to yes, even without a response, so that the fee would not be applied. It states that the changes had occurred by April 2017[30]. Its separate account of the Employment Income Confirmation (EIC) phase describes an automatic fee only where the initial letter had been received but no contact followed[31]. These accounts document removal of an automatic consequence or additional conditions for it. Their precise relationship, including differing descriptions in the Ombudsman's report, remains unresolved (see Supplement S4.3).

OCI became Employment Income Confirmation (EIC) in February 2017. Until August, averaging was suspended for reviews where recipients had received the initial letter but had not begun or completed the process. DHS introduced two "genuine" telephone contact attempts following non-response. From August, after failed attempts, officers were to finalise reviews using averaged income[32]. Contact requirements and responsibility for finalising the calculation changed, while averaging remained available.

4.4. Later action, confirmation and recognition

Mr R found two overdue discrepancy letters in his online account on 2 January 2017, after seeing news coverage. He questioned why letters had not been posted. DHS considered online letters and text reminders adequate. He reported calling Feedback and Complaints the next day. Directed to verify income through OCI, he said he did not know how and asked to visit an office. He was told no appointment was available and he would have to use a computer without assistance. DHS had no record of this call, but the Ombudsman accepted that it occurred given the information he reported[33].

On 10 January DHS entered Mr R's verbal updates, resulting in no debt. The Ombudsman suggested that an instruction to return callers online may have prompted the earlier referral, although staff were also instructed to direct people needing help to the compliance helpline[34]. The unrecorded call followed the deadlines and cannot explain the initial absence. What determined the staff response remains uncertain. Lindgren and Madsen's distinctions [11] clarify why help-seeking constituted action even while the declaration remained incomplete.

After no response to a letter sent on 30 September 2016, DHS applied ATO income and raised Ms H's debt of A$5,874.53. She reported seeking reassessment on 3 November, declaring that her employment had ended and uploading bank statements and a contract. Under the described procedure, this declaration should have stopped online processing and prompted officer contact, with manual intervention if needed. DHS

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28 Commonwealth Ombudsman, Centrelink's automated debt raising, pp. 35–36.

29 Commonwealth Ombudsman, Centrelink's automated debt raising, p. 37.

30 Royal Commission, Report, pp. 175–176.

31 Royal Commission, Report, p. 477.

32 Royal Commission, Report, p. 162.

33 Commonwealth Ombudsman, Centrelink's automated debt raising, p. 17, n. 29.

34 Commonwealth Ombudsman, Centrelink's automated debt raising, pp. 17–18.

acknowledged requesting bank statements already supplied, an incorrect reassessment on 23 November and an erroneous letter received the next day stating that no further action was required "at this time". A collector demanded payment on 2 December[35].

DHS also held a December 2010 record confirming when her employment had ended. The report records that, when a manual assessment was undertaken, staff initially failed to check that information. A manual reassessment on 18 January 2017 reduced the debt to zero[36]. Her reason for missing the initial request remains unknown. After 3 November, however, the evidence requires an explanation of the handling of information already supplied. A continuing debt is not evidence of continuing inactivity by the person affected.

Ms D had payslips but reported difficulty entering actual fortnightly earnings. After completing OCI, she received a debt of A$2,203.24. Following an online reassessment request, she said a text at 2 a.m. confirmed it. Supplying payslips and seeking another review produced a recalculation to A$332.21, upheld by an authorised review officer. DHS explained that averaging followed her online acceptance of ATO information. Despite its assurance that the system explained this calculation, the Ombudsman observed that the explanation was not apparent to her[37]. Repeated action secured a reduction, leaving a residual debt.

Mr S confirmed correct annual ATO income on 22 October 2016 and received a debt of A$3,777.43 the next day. The Ombudsman reports that he had not realised averaging could increase the debt. Further updates and reassessment reduced it to zero[38]. The Commission separately found that people confirming income were not warned of averaging[39]. Tarshish and Holler's distinctions [9] help separate completing a step from understanding how information would be applied to one's circumstances.

Later absence could also follow engagement. Ms C completed OCI, supplied payslips and encountered continuing collection and an erroneous zero-debt letter. She attributed her eventual withdrawal from dealing with Centrelink to stress. Manual reassessment later left a debt of A$507.55[40]. Across the cases, initial non-response, subsequent engagement and later withdrawal raise different questions about how organisations handle responses.

5. Non-claiming in Universal Credit managed migration

Universal Credit managed migration provides a supplementary setting for examining deliberate choice alongside incomplete action. Here the task was to make a new benefit claim. In the process described by the National Audit Office in early 2024, recipients of benefits being replaced received a migration notice asking them to claim Universal Credit within three months. Extensions and provisions for some later claims were available. Existing benefits stopped when no claim was made by the applicable deadline[41]. This recorded non-claiming left open the person's reasons and substantive eligibility for the replacement benefit.

The Department for Work and Pensions (DWP) offered several explanations. Changed circumstances might make people ineligible, and a small prospective award might seem insufficient to justify further engagement.

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35 Commonwealth Ombudsman, Centrelink's automated debt raising, pp. 13–14.

36 Commonwealth Ombudsman, Centrelink's automated debt raising, pp. 14–15.

37 Commonwealth Ombudsman, Centrelink's automated debt raising, pp. 11–12.

38 Commonwealth Ombudsman, Centrelink's automated debt raising, p. 12.

39 Royal Commission, Report, p. xxvii.

40 Commonwealth Ombudsman, Centrelink's automated debt raising, p. 21.

41 National Audit Office, Progress in implementing Universal Credit, pp. 28–31.

DWP said its research had found no evidence that migration presented barriers to claiming and took reassurance from receiving few complaints[42]. The National Audit Office reported that DWP had limited positive assurance that people were claiming the benefits to which they were entitled. Among tax credit recipients, the department could not distinguish active decisions against claiming from difficulties in doing so, because it did not contact non-claimants to ask why they had not claimed[43]. Plausible departmental explanations thus remained distinct from reasons established for particular people.

Research during the 2022 discovery phase, separate from the December 2024 study, involved 30 recipients who had read their migration notice. It identified low expected awards, stigma and assumptions of automatic transfer. DWP clarified the notice's requirement to act[44]. By early 2024 it was testing additional support, including calls and possible home visits, for specified benefit groups[45]. In that enhanced-support context, it committed to reviewing all termination decisions to ensure support avenues had been exhausted[46]. Testing and commitments do not establish programme-wide effectiveness.

The December 2024 study adds accounts of people's reasons. John, whose name was changed for anonymity, had researched Universal Credit through online videos and calculators. He anticipated substantial administrative work and feared that not meeting a minimum earnings threshold could require him to seek additional work. He decided to use savings until his pension became available[47]. His account supports a considered decision influenced by expected demands, without determining which conditions would actually have applied to him.

Sara initially assumed that migration would be automatic. She later tried several times to claim but feared making an error and having to repay money. In the published account, she expressed concern about waiting for telephone assistance and did not indicate awareness that help was available in person. She believed that more support could have enabled her to complete the claim and still intended to claim[48]. Her account records this belief alongside repeated attempts, leaving the effectiveness of such assistance unresolved. Non-completion coexisted with both an intention to claim and action directed towards that end.

Some interviewees decided against claiming despite financial difficulties, citing repayment concerns, perceived ineligibility and earlier encounters. Anita reported discouraging and inconsistent advice when seeking an extension[49]. Anticipated burdens can inform a decision, and responses to help-seeking can affect subsequent action. As Brodkin and Majmundar [1] recognise, choice matters to procedural exit but requires investigation rather than presumption.

Robodebt could impose retrospective debt after non-response, whereas managed migration linked the ending of existing payments to failure to claim a replacement. Alternative income could make forgoing that benefit more feasible. In both settings, explaining behaviour required evidence beyond response status, while establishing reasons would leave a separate question about the procedure connecting an unmet requirement to its consequences.

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42 Committee of Public Accounts, Progress in implementing Universal Credit, pp. 13–14.

43 National Audit Office, Progress in implementing Universal Credit, p. 36.

44 National Audit Office, Progress in implementing Universal Credit, p. 34.

45 National Audit Office, Progress in implementing Universal Credit, p. 37.

46 Committee of Public Accounts, Progress in implementing Universal Credit, p. 15.

47 McGrady, Roberts and Snook, Move to Universal Credit non-claimants, p. 59.

48 McGrady, Roberts and Snook, Move to Universal Credit non-claimants, p. 60.

49 McGrady, Roberts and Snook, Move to Universal Credit non-claimants, pp. 60–61.

6. Attribution, default and the recognition of action

Uncertainty about a person's reasons did not necessarily prevent an administrative decision. In the Robodebt pilot documents, acceptance provided a rationale for proceeding, while the rule for using matched data could operate without establishing acceptance in each case. Taylor's objections challenged that rationale without changing the prescribed practice. Under the original OCI procedure, non-response was treated as grounds for presuming that no reasonable excuse applied when determining the recovery fee. Correcting an administrative attribution about a person's conduct need not change the procedure that produces the administrative consequence.

These findings show how the distinction drawn from Eickers's account [12] can inform the analysis of administrative decision-making. Rules could guide a response to another person's conduct without resolving what that person intended. The pilot exchanges also show that attributions could justify such rules, so their evidential basis still matters. Van Langenhove's account of socially enabled and constrained agency [14] directs attention to a different relationship. Mr R and Ms H acted, but the administrative recognition of their action depended on its recording and consideration. On this reading, identifying an exercise of agency and explaining its influence on a decision are separate analytical tasks.

The revisions identify points where administration sought further information before proceeding. DHS's stated referral conditions concerned receipt and disregard, while EIC required contact attempts before officers finalised reviews using averaged income. Universal Credit reports describe different contact arrangements for different groups. An unsuccessful attempt does not establish understanding. What evidence is required depends on the decision that follows failed contact.

The Robodebt documents show how digital administration redistributed work and altered opportunities for explanation. The Ombudsman contrasts the interim manual process, in which responders spoke to compliance officers, with OCI's transfer of fact-finding and data entry to individuals[50]. Bovens and Zouridis [17] already describe how a complaint or objection can bring a specialised official into otherwise system-level administration. In Robodebt, the online channel, reminder sequence, questions about reasons and instructions attached to records shaped when staff would encounter an explanation before calculation. Attributions remained in staff communications, and defaults had existed in manual administration. The evidence identifies a redistribution of tasks and opportunities for judgement, not a complete replacement of interpretation by software.

Later action changes the explanation required. Mr R's request for help and Ms H's submission demonstrate engagement despite failures in recording or handling it. These actions are compatible with the constraints on agency identified by Moynihan et al. [4]. That study describes people failing to respond after several notices as forfeiting their opportunity to contest a charge. The same study also reports rare cancellations or reductions with little explanation and describes assistance from advocacy organisations. Distinguishing initial default from later review makes these stages clearer. Reassessment procedures and cases show that missing an initial deadline did not invariably end contestation[51]. A debt could remain in place during efforts to secure correction. Following those efforts connects Brodkin and Majmundar's organisational analysis [1] with correction costs, without treating eventual revision as evidence that access to review was adequate.

Complaint records provide another view of how organisations register action. DWP explicitly took reassurance from few complaints. In Robodebt, the Ombudsman reported DHS's low complaint count but

[50] Commonwealth Ombudsman, Centrelink's automated debt raising, p. 23, n. 49.

[51] Commonwealth Ombudsman, Centrelink's automated debt raising, pp. 10, 13–18, 35.

noted that some concerns had not been recorded as complaints. The Ombudsman also suggested that problems resolved through reassessment, without being recorded as complaints, might help explain the low count[52]. One source records an inference from low numbers, while the other identifies limits to what was counted. Both make the production of the record relevant to its interpretation.

Practical assessment should focus on the point where a particular consequence follows. Moynihan et al. [4] recommend secondary review and appeals against automatic decisions imposing losses. Evidence requirements differ: receipt and disregard for DHS's stated collection-referral conditions, a reporting breach for the recovery fee, and relevant fortnightly earnings for entitlement. Comprehensible notices, assistance, recording and consideration of later information therefore address different problems. Revisions offer arrangements to evaluate, not proof of sufficient safeguards. Receipt does not validate a debt calculation, and recording a request does not ensure its consideration.

7. Conclusion

People can be treated as non-responding when a requirement tied to a channel, deadline and procedural stage remains unmet despite uncertainty about their reasons. Robodebt's notification channels, online tasks and assistance arrangements shaped responding, while later contact could be absent from records. Universal Credit required a new claim by the applicable deadline. In neither setting does recorded non-response establish unwillingness to act.

The consequences depended on how administration used that status. An attribution of acceptance could provide a rationale for proceeding after non-contact. A rule could trigger calculation without resolving reasons or treat a missing answer as grounds for presuming no reasonable excuse. Reported revisions changed some defaults and contact conditions. Digital arrangements redistributed fact-finding and data entry and altered occasions for explanation. Completed responses also posed distinct problems: the Ombudsman describes Ms D's difficulty entering fortnightly earnings and Mr S's confirmation of a correct annual figure without understanding averaging. For Mr R and Ms H, later action instead brought administrative recognition into focus: whether help-seeking and submitted evidence were recorded and considered.

The article develops burden and exclusion research by distinguishing the evidence used to interpret conduct, the rules prescribing the next step and the handling of later action. Challenging an attribution, changing a default and securing consideration of a response address different points at which administrative consequences arise. Deliberate choice and unsuccessful efforts can each leave a requirement unmet, while a completed response need not express agreement with its consequences. Further research linking notification, contact attempts, records and later decisions to people's own accounts could assess how assistance and review change these relationships.

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