Scam Reduction Section
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Draft SMS Sender ID Register (Application, Access and Administration) Determination 2025

Dear Sender ID Register team,

Council on the Ageing Queensland appreciates the opportunity to comment on the *Draft SMS Sender ID Register (Application, Access and Administration) Determination 2025* consultation paper by the Australian Communications and Media Authority (ACMA).

Council on the Ageing Queensland is a consumer peak body representing the rights, needs, interests, aspirations, and futures of older Queenslanders and older Australians since 1957. We are an ageing country, with 17% of the Australian population aged 65 years and over. By 2050, one quarter of all Australians will be aged 65 years and over.

Given the exponential growth of our population and the evolving digital and communications literacies required to navigate supports and services across health, aged care, retail, education, and other sectors, it has become increasingly important to ensure accurate up to date information and channels to supports and services when it is needed most. This is especially the case in regional and rural communities, and for older people who have experienced a history of encountering systemic inequities in accessing services and supports (sometimes known as 'at risk' or 'vulnerable' populations of older people).

We support the SMS Sender ID Register's objective of making SMS communication more trustworthy and safer. To maximise impact for older people, however, we urge the ACMA to prioritise:

- Consumer-tested disruption language and education aligned to 'high harm' channels.
- Registration pathways that maintain the validity of and communications from smaller community groups and organisations.
- Accessible, well-supported appeals and consumer help mechanisms.
- Transparent and plain-language reporting to guide ongoing improvement to communications and mechanisms for scam prevention.

We provide a breakdown of these four areas below.

1. Message disruption and language considerations

We strongly support an initiative that disrupts impersonation scams. Terminology and how disruptions/interventions are rolled out will determine whether older people understand and trust the change to scam notifications.

Older Australians remain disproportionately affected by scams. In 2024, people aged 65 years and over recorded *$99.6 million in reported losses* to Scamwatch (31.3% of all reported losses) despite comprising 17% of the population. Median losses for this group were $1,000. The Australian Digital Inclusion Index (ADII) shows people aged 75 years and over have the lowest digital ability scores (23.3 which is 41.6 points below the national average) and the highest affordability stress (with 65.2% spending less than 5% of household income on internet or mobile).

Given this impact to older cohorts, the language used in scam disruptions needs great consideration through e.g., plain language, consumer testing, and phased introduction of disruptions/interventions. Labels such as 'Unverified' or 'Likely SCAM' may prompt panic or dismissal. Further:

- Consumer-testing the wording of disruption/intervention (scam notifications) with target groups especially more vulnerable older adult cohorts before implementation. Clear, plain language explanations should be utilised within the notifications.
- Align education with 'high harm' channels. For example, while SMS accounted for $14 million in reported losses, phone calls led to $107.2 million; therefore, public messaging should cover both SMS and voice scams.
- Deliver outreach via trusted channels such as community radio, libraries, and seniors' groups using a phased campaign rather than automated/technical notifications alone.

2. Maintaining validity of smaller, community-based organisations and services

Older people often rely on community-based organisations such as seniors' interested groups, community clubs, volunteer activities, community programs, (health and aged) care navigation channels for trusted information. Many of these groups lack formal Australian Business Number (ABN) registration, dedicated digital resourcing and/or have limited digital capacity. The ACMA's revised allowance for non-ABN holders to register via certified telecommunications companies is welcome but does not eradicate the practical challenges.

Legitimate community messages risk being blocked which could confuse older recipients and undermining trust. It is essential to ensure smaller community groups can register recognisable names (trading names, acronyms, or program names) while maintaining safeguards against scammers misusing government- or bank-like IDs. Therefore, it is necessary to:

- Maintain flexible 'valid use case'[1] proofs, allowing community-recognised program names while preserving rigorous filtering (vetting) of potential scam messages.
- Provide assisted registration pathways via telecommunications companies with templates and guidance, reminders, and transitional arrangements so smaller community groups and organisations can understand its importance and compliance.
- Support requirements with regular prompts or simplified confirmation tools, preventing accidental lapses or errors from smaller community groups and organisations.

3. Access and mechanisms for appeals

A clear, low-friction consumer and sender pathway is essential when legitimate messages are disrupted or mislabelled. Older Australians may rely on SMS for time-critical information such as

[1] A valid use case is a description of the ways in which a user interacts with a system or product: Australian Digital Inclusion Index

health alerts, government updates e.g., local government notifications during natural disasters, and banking notifications.

Impersonation campaigns targeting myGov, the Australian Tax Office (ATO) and Services Australia generated 23,700 Scamwatch reports in 2024. This type of disruption without support erodes service users' confidence and trust (in the service and in using digital communications). Equally, entities must have obligations to maintain up-to-date user records to reduce risk. Specific considerations may include:

- Establishing a single, well-publicised help route (website and phone line) to troubleshoot false positives and urgent failures, with warm referrals to IDCARE where identity compromise is suspected.[2]
- Creating a simple appeals mechanism for organisations whose legitimate messages are wrongly disrupted.
- Generating reporting of any suspected misuse and prompt removal of parties which is supported by quarterly checks.

4. Transparency and reporting

Transparency will reinforce trust, improve equity, and help create tailored consumer education. Older Australians continue to experience the greatest impact from scams and reporting must generate insights that can be translated into practical advice. Accurate data is essential to these processes and may include e.g.,

- Publishing regular aggregate statistics on registrations by sector/size, rejected or flagged applications (anonymised), complaints and appeals outcomes, and metrics (broken down by channel such as voice, SMS, email).
- Providing plain-language reporting and resources co-designed with community organisations and the Be Connected program, which has independently demonstrated success in lifting older people's digital skills, confidence, and safety practices.
- Collaborating with not-for-profits and networks relevant to older people (e.g., seniors interested groups, social networks, community programs, exercise programs) to continue to raise awareness around scams and register updates particularly in communities or cohorts who have lower digital literacy.

The aforementioned considerations we view as opportunities to improve practical safeguards for older consumers and to reduce disruptions, harms and threats from scams (without creating new barriers to communication or to digital literacy and consumer confidence).

We look forward to hearing the outcome of this consultation.

Sincerely,

Stephanie Power

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[2] In 2024, 7,670 Scamwatch reporters were referred to IDCARE which demonstrates the value of linked support: ACCC