CENTREPAY INCORRECT PAYMENT POLICY

Safehouse Locks
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About this policy

This policy explains how **Safehouse Locks** identifies, prevents, manages and rectifies incorrect payments received through Centrepay.

Safehouse Locks is committed to ensuring Centrepay deductions are correctly applied to customers and are only received for amounts properly owing for eligible goods and services.

We will monitor and reconcile Centrepay payments against our customer, job and invoice records and take prompt action where an incorrect payment or customer credit is identified.

What is an incorrect payment?

For the purpose of this policy, an incorrect Centrepay payment includes a deduction that:

- is not covered by a valid Centrepay deduction authority
- has been paid to Safehouse Locks in error
- is a duplicate payment
- results in Safehouse Locks receiving more than the amount the customer owes
- relates to goods or services excluded from Centrepay
- results in Safehouse Locks holding a customer credit that is not likely to be used within the permitted period.

For Safehouse Locks' goods and services, a customer credit that is not likely to be used within **6 months** will be treated in accordance with Centrepay's incorrect payment requirements.

How we identify incorrect payments

Safehouse Locks uses an internal database called the **Job Register** to maintain records of customers and jobs.

The Job Register contains information including:

- customer details
- jobs undertaken
- invoice numbers
- amounts charged
- relevant notes and communications.

Centrepay payments are checked against the customer's relevant job and invoice records to ensure payments are correctly received and applied.

Where appropriate, we will reconcile Centrepay deductions against the amount owing by the customer.

We will investigate discrepancies including:

- payments exceeding the customer's outstanding balance
- duplicate payments
- payments received after an amount has already been paid in full
- payments that cannot be matched to the appropriate customer or job
- unexpected customer credits
- deductions that do not correspond with the customer's agreed Centrepay arrangement
- payments received for goods or services that are not permitted under Centrepay.

If an inconsistency is identified, the customer's records will be reviewed to determine why the payment occurred and whether it constitutes an incorrect payment.

Advising customers about credits and incorrect payments

When Safehouse Locks identifies an incorrect Centrepay payment or customer credit requiring action, we will contact the customer as soon as reasonably practicable.

We will explain:

- the amount of the incorrect payment or credit
- how the payment or credit occurred, where known
- what action Safehouse Locks proposes to take
- how the payment or credit will be corrected or refunded
- whether any change to the customer's Centrepay deduction is recommended.

We will advise the customer of the incorrect payment and how it was corrected **in writing or verbally if a written response is not possible**.

Relevant communications and actions will be recorded in our Job Register.

Changing, suspending or cancelling a Centrepay deduction

Customers can request to change, suspend or cancel their Centrepay deduction.

A customer can contact Safehouse Locks by:

Phone: 0432 828 422
Email: service@safehouselocks.com
In person: 142 Foveaux St, Surry Hills, Sydney

When a customer tells us that they wish to change, suspend or cancel their Centrepay deduction, we will assist them with the appropriate process and ensure our records are updated.

Where we identify that a customer's Centrepay deduction may result in further payments being received when no further amount is owing, we will take appropriate action and contact the customer to help prevent further incorrect payments.

Customers retain the right to manage their Centrepay deductions through Services Australia.

Preventing incorrect payments

Safehouse Locks will take reasonable steps to prevent incorrect Centrepay payments before they occur.

These steps include:

- maintaining accurate customer, job and invoice information
- checking Centrepay deductions against amounts owing
- recording relevant payment information against the correct customer and job
- monitoring for duplicate or excessive payments
- monitoring customer credits
- identifying Centrepay deductions that may need to be changed, suspended or cancelled
- taking action where a customer's account has been paid in full
- investigating discrepancies when they are identified
- communicating with customers where action is required.

Where an incorrect payment identifies a weakness in our procedures, Safehouse Locks will review what occurred and make reasonable changes to prevent the same type of error from recurring.

Affected customers will be informed of relevant action taken where appropriate.

Managing and reconciling Centrepay deductions

Safehouse Locks will manage and reconcile Centrepay deductions against its customer, job and invoice records.

The purpose of reconciliation is to ensure:

- deductions received can be attributed to the correct customer
- payments are applied against the correct job or invoice
- amounts received do not exceed amounts properly owing
- duplicate or unexplained payments are identified

- customer credits can be identified and investigated
- Centrepay payments are only accepted for eligible goods and services.

Any discrepancy identified during this process will be investigated and, where necessary, managed as an incorrect payment.

Rectifying and refunding an incorrect payment

When Safehouse Locks confirms that a Centrepay payment has been received incorrectly, we will take appropriate action to rectify the matter.

Where escalation to Services Australia is **not required**, Safehouse Locks will refund the incorrect payment **within 10 business days**.

We will:

1. confirm the amount of the incorrect payment
2. identify how the incorrect payment occurred, where possible
3. contact the customer
4. determine the appropriate method of correction or refund
5. return the incorrect payment within the required timeframe
6. advise the customer how the incorrect payment was corrected
7. record the investigation, communications, refund and outcome in our Job Register
8. review whether any change is required to prevent the issue occurring again.

When an incorrect payment cannot be returned

If Safehouse Locks is holding an incorrect Centrepay payment and has made all reasonable attempts to refund the customer but is unable to do so, we will contact Services Australia for assistance.

We will provide information requested by Services Australia, which may include:

- how the incorrect payment occurred
- the amount involved
- our attempts to contact the customer and return the payment
- the processes we have in place to prevent and manage incorrect payments
- details of any other incorrect payments being held
- whether the payment is required to be reported to another regulatory authority.

Safehouse Locks will cooperate with Services Australia to determine the appropriate way to return or otherwise deal with the payment.

Unclaimed money

Safehouse Locks will not transfer an incorrect Centrepay payment to a State or Territory authority responsible for unclaimed money without first meeting our Centrepay obligations.

Where an incorrect Centrepay payment may need to be transferred as unclaimed money, Safehouse Locks will contact **Services Australia at least 20 business days before issuing the payment to the relevant State or Territory authority**.

We will follow any applicable instructions provided by Services Australia.

Directions from Services Australia

If Services Australia gives Safehouse Locks a written direction about how an incorrect Centrepay payment must be dealt with, we will comply with that direction.

After taking the required action, Safehouse Locks will advise Services Australia of what we have done.

Relevant details and actions will be recorded in our business records.

Staff responsibilities and training

Staff involved in Centrepay payments will be made aware of this policy and Safehouse Locks' Centrepay obligations.

Relevant staff will be trained to:

- identify possible incorrect payments
- identify excessive or duplicate payments
- recognise customer credits requiring investigation
- correctly record information in the Job Register
- assist customers who wish to change, suspend or cancel deductions
- escalate incorrect payments where necessary
- correctly document refunds and corrective actions
- protect customer information and comply with privacy obligations.

Review and continuous improvement

Safehouse Locks will review incorrect payment incidents to identify whether changes to our processes are required.

Where an issue is identified, reasonable corrective measures will be implemented to reduce the likelihood of the same problem occurring again.

This policy will also be reviewed when Centrepay requirements change or when Safehouse Locks changes its relevant business processes.

Version Control

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