



DESIGN WORKING GROUP - OUTCOMES

Venue: WebEx Virtual Conference

Event Date: Wednesday 9 February **Start:** 1:00pm **Finish:** 2:00pm

Chair: Natalie Ross Assistant Commissioner, ABRS Pipeline & Design, ATO

Contact: DPO@ato.gov.au

Industry Attendees: Andrew Smith (MYOB), Chris Denney (SuperChoice), Erin Adams (Xero), Feroz Khan (Illion), Frank Galati (Prime Consulting), John McCarthy (Pitcher Partners), Joseph Vartuli (Creditor Watch), Maïke Muth (Class), Matthew Addison (The Institute of Certified Bookkeepers), Matthew Lewis (Intuit), Michael Wright (Access Software Australia), Pravin Kunhiraman (Equifax) Richard Atkinson (Illion), Simone Dixon (ELMO Software), Warren Renden (BGL).

Apologies Mary Arrowsmith (ATO), Dorian Broadrick (Illion), Halina Sutton (Company 123), Robert Zitek (Corporate Express), Vince Di Chiara (AICD), Yan Dehorta (Equifax).

Government Attendees: Daniel Smyth (Treasury), Kate Penney (Treasury), Matthew Whelan (Treasury), Samuel Burt (Treasury)

Amit Hossain, Chelsea McIntosh, Tim Matthews, Alistair Kemp, Cedric Herbert, Doug Wickham, Fiona Seymour, Julie Huynh, Elaine Harding, Mike Steveson, Karen Redhead, Sonia Lark, Natalie Ross, Eleanor Beer, John Spao, Greg Finn.

Opening remarks, action items and program updates – Natalie Ross

An update was provided for the following open action item:

Action Item	What	Update
DWG-34	Provide the DWG members with a long-term program roadmap.	Work is ongoing to provide BAG/DWG members with a broader roadmap for the complete program. Update provided later in meeting.

The introduction of Director ID has exceeded expectations for its public beta with approximately 250,000 applications since its launch last year.

There is currently broader planning occurring because of the current environment and shifting priorities. Further updates regarding the original delivery tranches and subsequent changes will be communicated in future DWGs.

The DWG membership refresh will be finalised by 15 February 2022 with the next DWG meeting beginning with the refreshed membership. Outcomes will continue being published on [Software Developers Website](#) and general information can be found on the [ATO website](#). Recent webinars covering an introduction to DPO and the ATO API Developer portal are also available on the [Collaboration Hub](#).

Fees consultation paper – Kate Penney

Treasury released a consultation paper on fees in late 2021. This paper builds on the 2018 consultation process and is focused on late fees, search fees, infrastructure fees, and lifecycle fees given the change of operating environment. Treasury thanked Members for their input and relayed a number of high-level findings noting that analysis was still underway. Treasury was welcoming of engagement into the future and

acknowledged that providing early certainty to Members was important to support the rollout of the Program, noting that any decisions remain a matter for Government.

Acting on Behalf of Individuals in the Register – Doug Wickham

Concerns were raised in previous DWGs regarding the inability of agents to act on behalf of an individual (an agent representing a person and not the company entity). Having the ability for agents to act on behalf of an individual is high on the requirements list from members and agents. Issues to navigate include consent, the ability to cascade information to other registry records, multiple agent scenarios, data integrity when migrating information from 30 registers, and legal considerations.

As is currently possible today, agents will continue to be able to view and update officeholders details on the entity record. The introduction of a linked individual record has created some design challenges for the program which we are currently working through.

The ability to act on behalf of an individuals' record will not be available in the companies release due to the timeframe required to navigate the complexity of the issues. There is a strong focus in ensuring data integrity and addressing legal ramifications.

Unlike the information about an individual on the Company register which is public, the information on the individual record is private to the individual. Ideally, information should be consistent across all registers the individual is associated with as the data is personal to the individual. However, complexity comes into the solution when determining who has consent (under the different registry laws) to view and update an individuals' record, and how should the information cascade across registry records? For example - The agent of one company cannot update the data of another company even if the director is the same, if they are not the agent of both companies.

Data is being matched and validated (addresses through an address verification service and identity documents through a Document Verification Service) to ensure accuracy and data integrity on the ABRS register. Periodic address matching also occurs to circumvent the challenges that arise due to the option for users to manually input addresses.

Connecting people to their company office holdings – Mike Steveson

From Director ID we have a pool of directors of known identity on the ABRS platform. From the Companies Register we have a pool of company office holders (directors and secretaries of companies). These have a lower level of identifying information.

For the companies release, connections between the two groups need to be created so that people can represent their companies to the registrar.

The challenge is wanting to make as many links as we can (the more connections we make, the better for clients) but also in ensuring links are only made when there is confidence that they are right (to ensure the integrity of the register).

ABRS asked whether intermediaries hold information which could allow making more connections with higher confidence. ABRS is seeking to engage with DWG members and asked that members contact the [DPO](#) if they would like to participate in a one-to-one or a focus group on this topic.

Current Registry and ASIC forms to services – Eleanor Beer and Tim Matthews

The current priority of work is the companies release with a delivery date of September 2023. The companies release will impact public companies, private companies, and users who are dealing with ASIC and ABR. Using a commercial-off-the-shelf registry solution provides the benefit of out of the box functionality however this means that the MBR program will need to work within existing capabilities.



Current state ASIC forms in scope for Companies release have been reviewed to determine the split between those that will remain with ASIC as regulatory services, with the rest transitioning to the ABR from ASIC registry services. An indicative breakdown of forms to services was provided showing the current number of forms, future number of services expected, and the associated wholesale APIs. The numbers of services and associated APIs made available is expected to fluctuate as design progresses. Existing forms may be consolidated into one service or split into several new services depending on the purpose, function, and usage of the form. The MBR program aims to implement many individual services rather than combining forms into complex-multifunction services.

A breakdown of current and planned REGISTER and MAINTAIN APIs was shared.

Action Item	Who	What	When
DWG-37	DWG Members	Members were invited to nominate any additional high priority services that they see as a gap and should be made available via API.	Next DWG meeting

Other business – Natalie Ross

Future DWGs will cover the complexities involved with API risk ratings, design canvases and associated 'moments that matter', the consultation plan, and data harmonisation.