

# Welcome to the MBR Design Working Group – 10 March 2022

Thank you for joining us, we will begin the meeting at 2:00pm AEDT

## To connect to audio:

1. Hover over the bottom of the webinar screen
2. Click on the phone receiver button
3. You can choose to connect to the audio:
  - using your computer or
  - by dialling in using the prompts on your screen

## When dialling into the webinar:

- Dial 1800 888 453
- Enter attendee code 2650 537 0832
- If you are unable to connect to the 1800 number, try one below:
  - Adelaide +61-8-7079-0394
  - Brisbane +61-7-3067-4844
  - Melbourne +61-3-9070-6484
  - Perth +61-8-6388-9974
  - Australia Toll +61-2-9053-7190
  - Australia Toll 2 +61-2-9338-2221

# MBR Design Working Group

Thursday 10 March 2022



**Australian Government**  
**Australian Taxation Office**



# Open action items

Action item	Status	Who	Action
<b>DWG-34</b>	Open	MBR Program	Provide the DWG members with a long-term program roadmap.
<b>DWG-37</b>	Open	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.

# Group introduction and expectations

Natalie Ross – Assistant Commissioner, ABRS  
Pipeline & Design



**Australian Government**  
**Australian Taxation Office**



# Moments that matter

Karen Redhead – Assistant Commissioner, ABRS  
Strategic Program Design  
Danielle Breckon – ABRS Strategic Program Design



**Australian Government**  
**Australian Taxation Office**



# There are 6 Modernisation Strategies

MODERNISATION STRATEGY <b>One account and identity</b> 	MODERNISATION STRATEGY <b>One smooth and seamless integrated register experience</b> 	MODERNISATION STRATEGY <b>Proactive, helpful and relevant information and reminders</b> 	MODERNISATION STRATEGY <b>Always connected to the right support</b> 	MODERNISATION STRATEGY <b>Trusted and protected data &amp; services</b> 	MODERNISATION STRATEGY <b>Unlocked social and economic value</b> 
<b>Client experience</b> <ul style="list-style-type: none"> <li>✓ We know who you are</li> <li>✓ Tell us once, update across the register</li> </ul>	<b>Client experience</b> <ul style="list-style-type: none"> <li>✓ One place to access all your registry service information</li> <li>✓ Services stay in channel</li> <li>✓ Easy to use 'self help' services</li> </ul>	<b>Client experience</b> <ul style="list-style-type: none"> <li>✓ Be informed and take action</li> <li>✓ Easy to understand next steps</li> </ul>	<b>Client experience</b> <ul style="list-style-type: none"> <li>✓ Get it right up front</li> <li>✓ Agent and intermediary enablement</li> </ul>	<b>Client experience</b> <ul style="list-style-type: none"> <li>✓ Protecting your privacy</li> </ul>	<b>Client experience</b> <ul style="list-style-type: none"> <li>✓ Accurate and complete registry information</li> <li>✓ Digital by default</li> </ul>
<b>Pain points addressed</b> <ul style="list-style-type: none"> <li>• Multiple systems lead to duplicated authentication and disparate personal information</li> <li>• Lack of traceability provides opportunities for unscrupulous and fraudulent behaviour</li> </ul>	<b>Pain points addressed</b> <ul style="list-style-type: none"> <li>• Multiple registers managed by different government agencies require multiple lodgements</li> <li>• Lack of a joined up view of an individual's company register relationships</li> <li>• Convoluted processes for updating records</li> </ul>	<b>Pain points addressed</b> <ul style="list-style-type: none"> <li>• Mistakes are often not identified until it's too late</li> <li>• Reduced paper correspondence</li> <li>• Lack of guidance and feedback on meeting registry obligations</li> </ul>	<b>Pain points addressed</b> <ul style="list-style-type: none"> <li>• Multiple information sources overwhelm and often conflict</li> <li>• Multiple agencies to call to update ACN/ABN company registration information</li> <li>• Fragmented processes for services</li> </ul>	<b>Pain points addressed</b> <ul style="list-style-type: none"> <li>• Privacy and use of personal data is unclear and difficult to understand</li> <li>• Lack of control over permissions for access and correspondence</li> </ul>	<b>Pain points addressed</b> <ul style="list-style-type: none"> <li>• Lack of data integrity and trust from multiple registers across multiple agencies</li> <li>• Multiple forms and complexity from the registry system</li> </ul>

# Modernisation strategies mapped to program objectives

## Government objectives

	TRANSFORMATION STRATEGY One account and identity 	TRANSFORMATION STRATEGY One smooth and seamless integrated register experience 	TRANSFORMATION STRATEGY Proactive, helpful and relevant information and reminders 	TRANSFORMATION STRATEGY Always connected to the right support 	TRANSFORMATION STRATEGY Trusted and protected data and services 	TRANSFORMATION STRATEGY Unlocked social and economic value 
<b>1</b> Increase <b>reliability and trust</b> in registry services	✓	✓	✓	✓	✓	✓
<b>2</b> Improve <b>service delivery</b> to reduce complexity for business	✓	✓	✓	✓	✓	✓
<b>3</b> Increase <b>data availability</b> to facilitate greater use and innovation		✓			✓	✓
<b>4</b> Deliver benefits to government by reducing the long term cost of business registry services and provide <b>greater flexibility</b> to respond to policy issues such as the Black Economy and illegal phoenix activity	✓	✓			✓	✓
<b>5</b> Builds <b>trust and confidence</b> in the Government's digital and data transformation initiatives	✓	✓	✓	✓	✓	✓
<b>6</b> Fosters <b>economic activity</b> and mitigates economic losses for businesses by minimising instances of fraud and business misconduct	✓	✓	✓	✓	✓	✓

# The role of Intermediaries in modernisation

Registered agents, DSP and third party intermediaries are **key registry users who help ABRS clients meet their registry obligations**. They provide expert and knowledgeable advice and services and act on behalf of clients, including providing value-added products and services.

Intermediaries are recognised as a valuable enablers – this group supports voluntary compliance and is critical to MBR's success in delivering on program outcomes.

It is assumed that all services listed across the moments that matter framework can be performed by agents and other intermediaries on behalf of their clients, unless specified otherwise.



**Approx. 75%** of Australian companies are represented by registered agents.  
This is the equivalent of  
**2.1 million companies**

*Data source:*

1. RFI #74 – FY19–20 data
2. Registers on a page overview – FY19–20

# How do we define a moment that matters?

**How do we identify those critical moments that will make a real difference in delivering on government outcomes?**

The program teams draw on program analysis from user research discovery, 2PBC commitments, stakeholder feedback and other inputs to identify those moments that matter based on one or more of the following criteria:

## Moments that matter – selection criteria:



### New service

Is it a new service offering? (i.e. not currently offered by ASIC)



### High volume

Is it a high volume transaction?



### High risk

Is it high risk?  
(risk to revenue, reputation – low volume but noise in the system etc)



### New technology

Are there transformational opportunities which can uplift existing services through new technology?

# How do we define modernisation?

Services across MBR will experience varying levels of modernisation across the program. Defining each level of modernisation across a modernisation scale will allow us to understand the level of change, effort required and target future experience for each service.

## Modernisation scale:

### Transfer

Transition services as they are currently performed today, with minor improvements and / or changes.

### Modernise

Improve existing services to provide an uplifted experience for key users through enhanced touchpoints.

### Transform

Reimagining interactions through new ways of working, new technologies and new services.

Note: A moment that matters can apply to services across each scale of modernisation

# Modernisation across ‘Moments that Matter’

Moments that matter have been identified through early community discovery activities and includes services which will achieve varying scales of transformation. Some services will be modernised through uplifted experiences while other interactions will be completely transformed and reimaged.

TRANSFORMATION STRATEGY	TRANSFORMATION STRATEGY	TRANSFORMATION STRATEGY	TRANSFORMATION STRATEGY	TRANSFORMATION STRATEGY	TRANSFORMATION STRATEGY
<b>One account and identity</b> 	<b>One smooth and seamless integrated register experience</b> 	<b>Proactive, helpful and relevant information and reminders</b> 	<b>Always connected to the right support</b> 	<b>Trusted and protected data and services</b> 	<b>Unlocked social and economic value</b> 
Apply for a director ID* 	ABRS online (registry lifecycle) 	Whole of government business inbox 	Client contact solutions 	ABRS agents governance model (incl. T&Cs) 	Entity and person search 
Linking director ID to company 	APIs for business software (registry lifecycle) 	Client correspondence for agents (CCL) 	ABRS channel of choice 	Suppress details on the register 	Wholesale information services 
Authentication and authorisation 	Integrated ABRS agents services 	Digital notifications 		Data disclosure framework 	Government information services 
Individual Registry Record* 	Combined Company registration 	ABRS website 		Electronic signatures 	Information subscriptions and notifications 
Evidence of identity (EOI) 	Annual review 	Strengthening ABN** 		Data standards 	
Unified updates ‘Tell us once’ within registry 	Simplified payments 			Director residential address suppression 	
	Deregister and reinstate 				

\*Do not have ‘on behalf of permissions

\*\*Delivered outside the scope of the MBR program

# API roadmap

Alistair Kemp – Assistant Commissioner, ARBS  
Delivery and Integration



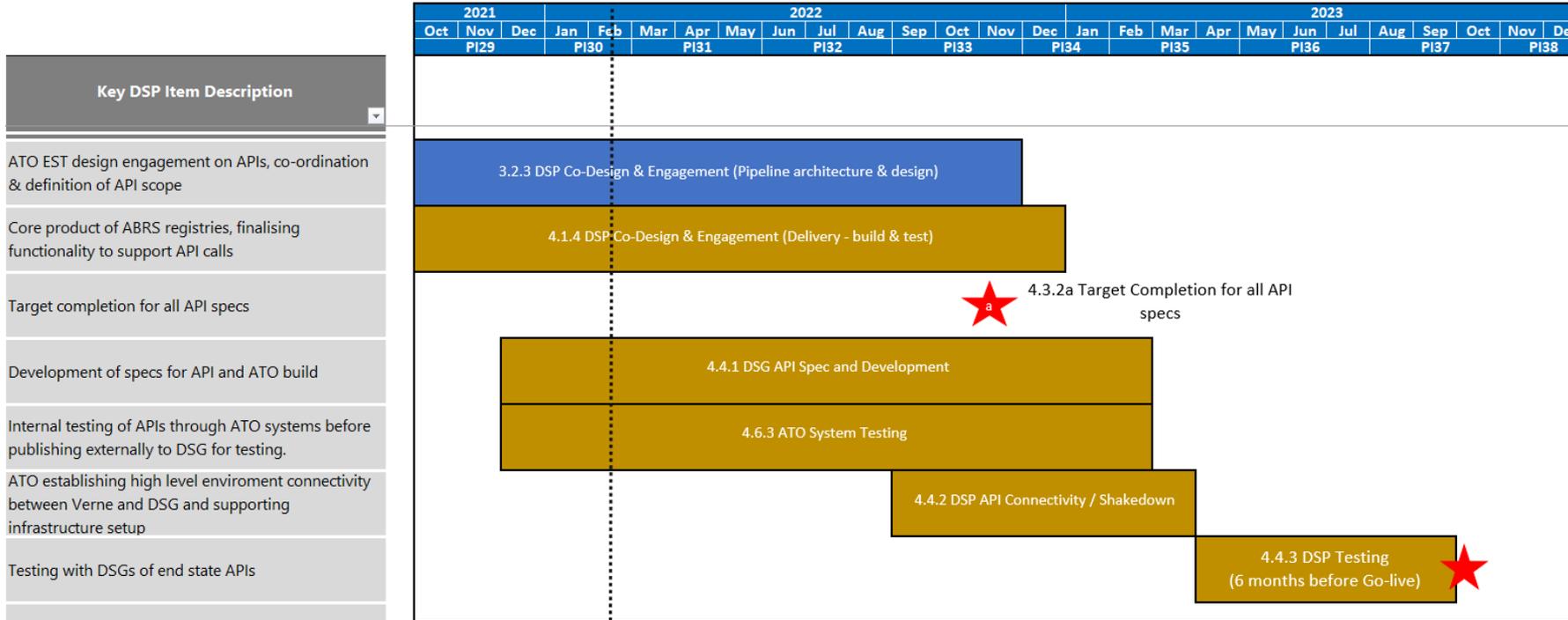
**Australian Government**  
**Australian Taxation Office**



# EST Delivery Roadmap – High level

Current IT focus is transitioning from architecture & design phases to internal build enablement phases and co-design of APIs.

Company delivery schedule extract for DSP related build items

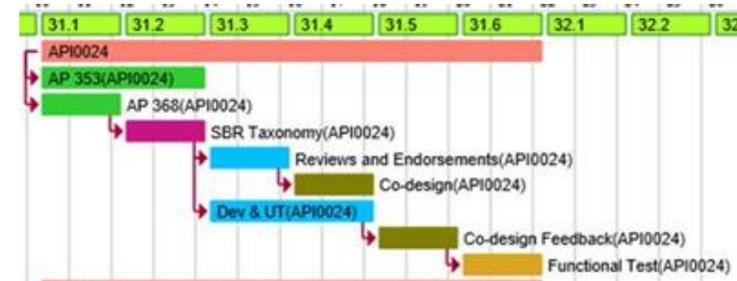


- ✓ 3.2.3 Currently working through finalising API scoping. ~50\* APIs to be run through API processes.
- ✓ Functional order of API delivery and testing is:
  - ✓ Apply
  - ✓ Register
  - ✓ Search
  - ✓ View
  - ✓ Maintain

## 4.4.1 DSG API Spec & ATO Development – more information

Each API will go through spec and development phase as illustrated to the right, key engagement with DSPs during co-design. PI31 aims to start with a smaller volume to get feedback for later iterations. First co-design sessions intended for April and continue into May to support PI31.

Indicative process per “API Spec & Development



# DWG Consultation Plan development

Eleanor Beer – Intermediaries Experience



**Australian Government**  
**Australian Taxation Office**



# Community Co-design: Enhancing the client experience

## PROGRESS TO DATE

Surveys were sent out to members of the BAG

8 Themes identified  
(detailed responses in [appendix](#))

Search experience

Strengthen ABN system

Design for intermediaries

Contemporary services

Improve data integrity

Wholesale experience

Whole of government

Single, secure point of access (one stop shop)

An out of session BAG was held  
04/11/21

## NEXT STEPS

### Communicate & share

#### Whole of government

We heard that a program roadmap would help people to understand the connection between the MBR program and government initiatives.

Action: Share program roadmap (including related BAU initiatives)

#### Wholesale and intermediary experience

We heard that people want to see the API schedule so they can plan ahead and understand what services will be available through software (and when).

Actions:

- Share updated ABRS API roadmap; and
- Share demo videos, support documentation and resources through the onboarding process

#### Search experience:

We heard that Director ID should be a public number and verifiable via search.

Action: Update on Director ID public disclosure & search

We heard that search fees should be removed or reduced.

Action: Update on Treasury Fees Review.

#### Contemporary services:

We heard that digital signatures should be enabled.

Action: Share progress and timing for implementation of digital signatures.

#### Strengthen ABN system:

We heard that there are ABN's in the system for businesses who may no longer be active.

Action: Provide an update on annual review initiative for ABN holders.

We heard that ANZSIC codes should be visible and that the use of multiple ANZSIC codes would benefit the community through a more accurate reflection of business activity.

Action: Update on ANZSIC code initiatives.

The [ANZSIC code expansion](#) is expected to be rolled out mid-December 2021.

### Dedicated information sessions

#### Program scope:

Provide an update on program scope, including:

- Authorisation and access for intermediaries
- Inbox and notifications
- The scope of 'Tell us once'

#### Search experience:

We heard that search services should be user friendly.

Action: Provide an ABRS Online demo of search functionality.

#### Design for Intermediaries:

We heard that services should be streamlined and designed so that intermediaries can act on behalf of directors and entities.

Action: provide information on services (retail and wholesale), including:

- How access to client correspondence will work for agents
- Authorisation and access for intermediaries
- Managing authorised contacts
- Updating a company record

#### Improve data integrity:

We heard that the migration of data from ASIC provides an opportunity to confirm, update and cleanse director and company data.

Action: Provide an update on what is planned for data migration, the data quality program of work and other data integrity initiatives (e.g. re-use of SBR taxonomy).

#### Registry experience and improve data integrity:

We heard that it would be useful to see more tangible examples of the future registry experience.

We heard that ongoing checks of ABRS data to identify issues and proactive engagement to correct errors should be part of the program.

Action: Provide an ABRS Online demo on functionality, including features to prevent data errors at point of entry (e.g. external address checking service, and business rules for address).

#### Wholesale experience:

We heard that DSPs and Information Brokers would like support available outside standard business hours.

Action: Run a Digital Partnership Office information session covering: current support model, communication channels, and Operational Security Framework.

#### Wholesale experience:

We heard that minimal outages and downtime would ensure business can be reliably conducted, and that the platform should be scalable, allowing a large volume of searches. Software Development Kits for APIs should be available to developers.

Action: Run a webinar covering attributes of the Digital Services Gateway.

### Focus areas for community co-design

#### Design for intermediaries:

We heard that it is important we recognise the role intermediaries play; and through improving their experience we improve the experience of their clients. There should be governance arrangements in place to support regulation.

Workshop on the agent model, including:

- Agent registration & re-registration
- Self appointment of companies
- ABRS agent governance

#### Search experience:

We heard that the register needs to balance public information with appropriate privacy considerations.

Data disclosure consultation sessions: Tiered model

#### Search experience:

We heard that search services should enable people to view connected entities.

Co-Design sprints: Viewing connections between entities

#### Wholesale experience:

We heard that bulk data retrieval should be enabled for company updates.

DWG forward agenda item: wholesale publish / subscribe (pub/sub) service.

#### Wholesale experience:

We heard that DSP's want enhanced functionality in APIs (e.g. more detailed and flexible access to information).

DWG forward agenda item: features of the DSP development portal and opportunities for detailed feedback/input on specific APIs.

# What we heard so far

DSPs and Information Brokers would like support available outside standard business hours.

**Action:** run an information session covering: current support model, communication channels, and Operational Security Framework

Service Strategy

Minimal outages and downtime would ensure business can be reliably conducted, and that the platform should be scalable, allowing a large volume of searches. Software Development Kits for APIs should be available to developers.

**Action:** run a webinar covering attributes of the Digital Services Gateway and consult on the service strategy and system availability.

Registry system performance and availability

Service Strategy

Bulk data retrieval should be enabled for company updates.

**DWG forward agenda item (April):** providing real time API access to data, opportunities for feedback/input on APIs.

API roadmap

Reporting solutions

DSP's want enhanced functionality in APIs (e.g. more detailed and flexible access to information).

**DWG forward agenda item:** contemporary JSON based APIs, accessed through DSP portal. Opportunities for feedback/input on specific APIs.

API roadmap

Digital collaboration hub

# Draft consultation timeline

2022

Consultation on disclosure framework and data standards

Detailed business design complete

Target completion of API specifications

Jan - Mar

Apr - Jun

Jul - Sep

Oct - Dec

Design Working Group

- ✔ Forms to services
- ✔ Act on behalf of IRR
- Transformation matrix and moments that matter
- Draft DSP Consultation plan
- API Risk Rating
- MBR program schedule and API roadmap update

- ATO/DPO DSP processes and services and support arrangements
- Wholesale Authentication and Authorisation
- ABRS agent model and existing client registration via retail
- Disclosure Framework and Data Standards
- Business digital inbox

- Digital Collaboration Hub
- Take-up and use of the Business Digital Inbox

- Registration and service solution for DSPs who only access free reports

Tactical focus groups

- Validate Information Brokers profiles/ use cases/needs

- Validate DSP profiles/use cases/needs
- DSP Service Strategy
- Registry system performance and availability

- TBC

- TBC

# API Risk Ratings

Kylie Johnston – Director, Digital Partnership Office



**Australian Government**  
**Australian Taxation Office**



# API Risk Rating - Overview

**DRAFT**

The characteristics of a service, combined with the potential business risk, can be used to define the overall risk associated with ATO Application Programming Interfaces (APIs) being made externally available to Digital Service Providers. **This is based on the risk of data exposure to the wrong person, it does not take into consideration data exposed to the right person through appropriate authentication and authorisation.**

The **characteristics** are identified by the following three considerations:



The **type of data** contained in the API and the level of public or protected exposure of the data:

- **Public** - considered to be readily available in the public domain **without any privacy or legislative barriers** e.g. ABR/ABRS public data
- **Business or Organisation information** including officeholders/associates, which is **made available through the disclosure framework**<sup>^</sup> (Include link when available)
- **Personal, Sensitive, Protected or Private**\* - considered to be 'information about an identified individual or entity' which could be used to identify 'who the client is' or used for 'proof of record ownership (PORO)' e.g. - TFN, address, FIA, contacts, non public/protected information from the ABR/ABRS.
- **Registration** - considered to be creating or updating the tax, super or **registry** profile of the client e.g. applying for a **TFN, ACN, ABN**, adding or updating a **PAYG, GST** or Excise registration.
- **Account** - considered to be any financial or non financial data about the tax and/or super profile of the client e.g. reportable income, deductions, payments, offsets etc.



The type of data contained in the **response or outcome**. For example the response contains:

- only data that is **public or made public through the disclosure framework** (Business or organisational information) e.g. successful transmission for an ABN
- **non interactive message validation** without confirming client data
- **interactive message validation** confirming client data
- tax, super or **ABR/ABRS registration** data
- tax, super or **ABR/ABRS account** data
- **personal, sensitive, protected or private** data that **WAS** provided in the request **or submission**
- **personal, sensitive, protected or private** data that **WAS NOT** provided in the request **or submission**



The **resulting action** of the request **or submission** in the ATO client register, ATO systems or **ABR/ABRS**. For example:

- Information is only **attached or captured** on the client record e.g. submit a pay event
- Information is **logged for processing or updated** on the client record e.g. add contact, update address, lodge a return
- Information from the client record is **provided or returned** to the user
- A transaction results in or could result in a **refund, transfer of money (or approval of a transfer)**

The **business risk** can be identified by considering where the action may directly or indirectly lead to fraudulent activity. The result could be used for:

**Information gain:**



- Identity theft – e.g. obtaining personal or sensitive information to steal or sell an identity
- Personal gain – e.g. obtaining personal or sensitive information to gain power or knowledge of another person.
- Commercial advantage – e.g. obtaining business information to gain power or knowledge of a competitor

**Financial gain:**



- Directly obtaining refund – e.g. updating FIA to obtain a refund
- Indirect obtaining refund – e.g. adding a tax registration that could lead to a lodgement with a refund

**Destructive behaviour:**



- Individual hack – e.g. a malicious actor creates incorrect records on a client account to cause harm or nuisance
- System hack – e.g. malicious attempt to crash a service or system (denial of service attack)

\*Personal information - <https://www.oaic.gov.au/agencies-and-organisations/guides/what-is-personal-information>

<sup>^</sup>Disclosure framework - TBA

4

Characteristics of a **high risk** service:

- Request or submission of the transaction results in, or could result in **updating personal, sensitive, protected or private client data** in the ATO client register, ATO systems or ABR/ABRS.
- Response **or outcome** of the transaction contains, or could **contain personal, sensitive, protected or private client data that was NOT** provided as part of the users request (example - additional information such as TFN, FIA etc is provided in the user response).
- **Request or submission of the transaction results in, or could result in a refund, transfer of money or approval of a request** (e.g. lodgment of an ITR or AS, payment transfer, direct debit arrangement or compassionate release of super)

3

Characteristics of a **medium risk** service:

- Request or submission results in, or could result in viewing **account data** in/from ATO client register, ATO systems or ABR/ABRS (example returning an account/transaction list from an account).
- Response **or outcome** contains or could contain personal, sensitive, **protected** or private client data that **was provided** as part of the users request (example -TFN, FIA etc is provided in the users request and is confirmed in the user response)
- Response **or outcome** provides interactive validation which, by way of receipt confirms accuracy of personal, sensitive, **protected** or private client data within ATO client register, ATO systems or ABR/ABRS (example - validating a TFN, address or FIA in ATO systems)
- **Updating business or organisation information made available to the public through the disclosure framework**

2

Characteristics of a **low risk** service:

- An initial registration where the request or submission results in **creating registration data** in the ATO client register, ATO systems or ABR/ABRS (this may include personal, sensitive, **protected** or private data with the initial transaction/submission e.g. ABN application which may contain a TFN of an associate).
- Request or submission results in, or could result in:
  - **Viewing or transmitting registration data** in/from the ATO client register, ABR/ABRS or ATO systems (excludes personal, sensitive, **protected** or private data).
  - **Viewing business or organisation information made available to the public through the disclosure framework**
  - **Providing account data**, attached/captured in the ATO client register, ATO systems or ABR/ABRS (example lodge STP pay event or dividend/interest report).
- Response **or outcome does not** contain personal, sensitive, **protected** or private client data nor confirms through interactive validation (examples - user response **or outcome** does not contain TFN, FIA etc).

1

Characteristics of a **no risk** service:

- Access to data that is intended to be **publicly available**.
- **Access to tools and calculators which provide non-interactive or formula based validation.**

# Other Business

Natalie Ross – Assistant Commissioner, ABRS  
Pipeline & Design



**Australian Government**  
**Australian Taxation Office**



# Questions?

Raise a ticket in Online Services for DSPs or email us at [DPO@ato.gov.au](mailto:DPO@ato.gov.au)



**Australian Government**  
**Australian Taxation Office**

