



Australian Government
Australian Taxation Office

Design Working Group

Written update – April 2023

Contents

Program update	2
Companies Implementation Consultation feedback	4
Summary of Retrieving filing details API sessions	5
Summary of ASIC RA63 and RA67 debt reports sessions	8
Charter	9

Program update

Change of chair

I am writing to provide you with an update on the MBR DWG and to introduce myself as the new Chair. Following Mary Arrowsmith's retirement, I have taken over from Mary as Chair for this working group. My name is Karen Redhead, Assistant Commissioner of MBR Change, Readiness and Future Design. I have had a few different roles on MBR and I am excited to take on this role and to work with you all to continue building on the great work that has already been done.

Moving forward, my vision for this program is to ensure we are collaborating with industry professionals like yourself, ensuring we work together on shared solutions to support the many and varied users in the registry ecosystem.

As requested by the members of this DWG we are currently reviewing the frequency of the meetings to ensure we continue to provide timely updates on current work and upcoming consultation opportunities across the program.

As we wait for the independent review recommendations, we will be moving to written updates and rescheduling meetings for later in the year.

I am excited about the future of this program, and I look forward to collaborating with you all to achieve our objectives.

If you have any questions please contact the secretariat through the DPO mailbox.

Government review

The ATO welcomes the announcement of an independent review into the MBR program.

This is a significant program of work that will deliver modern and innovative registry services, and we recognise the importance of achieving this in a way that represents the best value for the community.

We will work openly and transparently with the independent reviewer to assist their enquiries and look forward to receiving their final report and any recommendations. We expect work on the program to continue as the review is underway.

We value the trust placed in us by government to deliver significant programs of work such as MBR, and remain committed to offering modern, integrated services to the community.

Companies Implementation Consultation feedback

The consultations held from November 2022 to January 2023 were part of the MBR program for Companies release implementation planning. The purpose was to measure support for the phased release approach, identify competing priorities, and understand the needs of Digital Service Providers (DSPs) and Information Brokers (IBs).

Summary of Retrieving filing details API sessions

An out of session DWG was organised to facilitate a discovery discussion based on a technical solution that is being worked through. The group was split between Information Brokers and Digital Service Providers to support a tailored dialogue. Key findings outlined below.

Information Brokers session – 20/2/23

<p>How many form types do you currently access, or are interested in accessing?</p>	<p>Information Brokers currently access all forms, especially forms related to changes and financial filings. The goal is to provide a service that covers all form types available on ASIC. Customers such as tax agents and lawyers use the service to register/monitor and appreciate being informed of any changes.</p>
<p>Which documents/form-types do you currently access?</p>	<p>Information Brokers currently access frequently requested forms such as:</p> <ul style="list-style-type: none"> • Form 484 - Changes to Company Details • Form 201 - Application for registration as an Australian company • Form 388 - Copy of financial statements and reports <p>Members also expressed interest in forms related to insolvency, bankruptcy, and companies going into administration. The Information Brokers emphasised the need to access all filing types, as that is what their customers expect.</p> <p>The group explored the possibility of obtaining additional information from lodgement details and discussed the potential for making published notices available through APIs.</p>
<p>Which details (lodgement/effective date/time, who lodged, filing type) do you utilise?</p>	<p>Members explored the possibility of moving towards digital filings and using automation to make data more accessible. They also emphasised the importance of gathering feedback from end customers, particularly credit providers, before making any changes to the delivery of data. Additionally, members discussed the benefits of accessing filing information as opposed to company records, and the potential for a changing details notifier.</p>

<p>Do you need the full content of each filing, or just select data fields?</p>	<p>The group talked about different use cases, and the importance of providing all the necessary data to customers who require evidence of a particular event. The discussion also explored that some customers may require extra documents beyond the company extract, depending on the type of filing.</p>
<p>What are some use cases for accessing the filing details?</p>	<p>One member mentioned that the goal is to draw all PPSR/ASIC/bankruptcy filings, while another member mentioned that when they perform a company registration (201) lodgement, they retain an original packet and a copy of what they send, which includes a CMY file (RA72) that is part of the company's registration.</p>
<p>How are filing details processed by Information Brokers?</p>	<p>Members discussed different methods, such as providing customer service through throughput and using Optical Character Recognition (OCR) technology. Members emphasised the importance of considering future solutions while also maintaining the document image to avoid liability issues with uniquely branded documents. The group expressed a preference for continued access to PDF copies of lodgements, but also desired the ability to receive data in a raw format.</p>

Digital Service Providers session – 21/2/23

<p>What types of services does your product currently offer and would ABRS filing services add any additional value?</p>	<p>Members agreed that filings information is important to their product offering, with some participants considering using them for future products. There was also a discussion about the need for different subsets of information, as some users only require a small amount of data to confirm a company's existence. The group also discussed the potential for the filings data to be used in the future by a broader group of DSPs to support emerging product offerings and digital identity validation/identification services.</p>
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<p>Is all information for a filing necessary or just "key" data?</p>	<p>Members explored the differences between general and specific information in a filing and how the format of information provided can impact its usefulness. Historical registration data is very useful, and access to more info would improve the state of client records, however, cost can be prohibitive for some.</p> <p>Member provided use case of clients performing health checks (i.e., reconciliation of records, comparing what is on register vs what is on their system).</p> <p>Data can be more important for general operations, but documents may be necessary for legal proceedings. The issue of share value in filings was raised, as the current EDGE system aggregates a share's value.</p>
<p>Would you consider supporting filing information for all companies and lodgements or only a specific subset (e.g., top 10 services by traffic)?</p>	<p>Some commonly requested documents include Form 484, Form 201, and Form 388 in terms of overall volume, but there are lower volume forms that remain critically important so access would still be required. Members noted that most lodgements are already covered but in future, forms may be structured differently into services which may affect the priority of information. Officer, shareholder, and address changes were deemed most important.</p>
<p>Have your customers shown interest in accessing filings and lodgements for companies and are there any specific ways your product could use this information effectively?</p>	<p>The group discussed the importance of historical data in events of disputes or where client has changed agents. There is also interest from customers in accessing filings and lodgements for companies. The completeness of records is also mentioned as an important factor.</p> <p>Discussion on receiving data fields vs PDF, and although, data was the preference, there is also interest in pdf format, especially around access to the original documents, and importance of digital signatures.</p>

The contents of this item will be published on [ATO's Software Developers](#) website and on the [Collaboration Hub](#).

Summary of ASIC RA63 and RA67 debt reports sessions

Large consumers of the ASIC RA63 and RA67 debt reports were invited for a 1-on-1 consultation to discuss the future of these services. The sessions were designed to seek input and advice on how users would like to use the equivalent API service in the future. Key findings outlined below.

<p>What are the reasons why DSPs want to use RA63 and RA67 reports? E.g. are you proactively looking to see if a client account has gone into debt and if so, notify the affected client, that they have a debt outstanding with the due date?</p>	<p>The main reasons why DSPs want to use RA63 and RA67 reports are to proactively monitor client accounts for debts, identify clients with debts and notify them of the outstanding amount and due date, and avoid penalty fees.</p>
<p>How do DSPs want to run/request these reports? E.g. run it every day for each agent they have, where they can see all companies for the agent which has an outstanding debt? And/or, on demand they want to see a company account.</p>	<p>DSPs want to run these reports either daily for all agents they have or on-demand when they want to see a company account. They noted their desire for real-time updates and flexibility in how the reports are run.</p>
<p>What is the essential information that DSPs need to be provided for this report to be useful for them? E.g. is due date for a debt essential?</p>	<p>The essential information that DSPs need in these reports includes due dates, line item breakdowns, and the ability to recreate the invoice as a data screen. DSPs noted that due dates are essential for providing a quality service to their clients.</p>
<p>Other</p>	<p>Debt reporting is considered a critical component in supporting agents to complete their work for their customers. Failure to provide this feature would render a DSP obsolete. Scalability is also essential, and there are approximately 2 million companies on software, making it non-viable for DSPs not to offer this feature in the future.</p>

The contents of this item will be published on [ATO's Software Developers](#) website and on the [Collaboration Hub](#).

Charter

The group's Terms of Reference have been updated into a Charter for consistency with other working groups in the ATO. The Charter will provide a clear framework for our objectives, roles, and responsibilities.

We invite all members to review the draft Charter and provide feedback to the [DPO mailbox](#) by 21 April 2023. Your input is valuable to us and we would appreciate any comments you may have.

The Charter will be published on [ATO's Software Developers](#) website and on the [Collaboration Hub](#).



Australian Government
Australian Taxation Office

Charter

Modernising Business Registers
Design Working Group

Purpose

Role

Special Purpose Working Group

The Modernising Business Registers Design Working Group (MBR DWG) is one of the ATO Special Purpose Working Groups operated by the ATO as a means to consult on a specific topic. The group collaborates on new or current products, processes or services and the implementation of new or changing legislation. Their specialist knowledge and experience helps build a clearer and mutual understanding of the taxation, superannuation and registry systems.

Scope

In 2019-20 the Government announced funding to make it easier and faster for business to interact with the Government. The Modernising Business Registers Program will create a single, accessible and trusted source of business data, by introducing Director Identification Numbers and transferring existing business registers on to a modernised platform operated by the Australian Business Register.

The MBR DWG will provide an ongoing means of direct consultation with Digital Service Providers (DSPs) who interact with ASIC and/or business registration services and Information Brokers (IBs). The members will provide technical advice, input, and opinion to help shape the design and implementation of the Modernising Business Registers Program.

Primarily, the MBR DWG has an advisory role covering:

- the MBR technical environment and the needs of DSPs and IBs in relation to business registry services
- co-design of the MBR technical implementation.

Roles and responsibilities

The **Chair** will ensure the group operates efficiently and effectively to achieve its desired purpose. The Chair should ensure

- they display integrity, courage and determination
- conflicts of interest are considered and the appropriate course of action determined and noted in key messages
- they are informed about matters that may arise during group discussions

- they direct the deliberations of the group by framing the issues, setting the tone for discussion and actively engaging members
- members respect and maintain the confidentiality of information provided by others
- members' views are heard while balancing staying on time and on track
- open discussions are encouraged to enable members to
 - understand the experience of other members
 - present their position on the subject matter, identify issues and any other relevant concerns
- members engage in good faith and respect the expertise and contributions of others.

Members are expected to

- disclose any matters that could be perceived to be, or are, conflicts of interest
- maintain confidentiality of information provided. This includes not using their membership for any commercial advantage, including marketing or access to privileged information
- actively contribute to the meeting discussion
- engage in good faith and respect the expertise and contributions of others
- bring relevant knowledge and expertise, either from own experience or by canvassing members of any organisation they represent
- provide the views of any association, profession or organisation they are representing, if applicable
- meet their legislative requirements regarding their personal tax obligations
- have capacity and willingness to be a conduit for peers in their stakeholder segment to provide input or receive feedback
- maintain a satisfactory attendance record for meetings.

Current members are listed on [ATO's Software Developers](#) website.

The secretariat will support the Chair by managing administration matters relating to the group, including

- arranging meetings and distributing agendas
- recording and circulating key messages

- identifying and recording action items noting who is accountable and the timeframes
- managing the forward work program.

Meeting requirements

Confidentiality

The group operate in an environment of transparency where information should standardly be considered confidential, and not to be shared publicly unless otherwise stated.

Members are not authorised to disclose information that was discussed or provided at a meeting which is declared confidential, or which they ought to reasonably know is confidential, without the prior written approval of the Chair.

Frequency

Meetings expected to be scheduled quarterly, subject to change based on evolving priorities.

Meetings may also be held “out-of-session” and written updates may be provided in lieu of meetings at the discretion of the Chair.

Participation

Member substitutions in meetings are permitted if advised in advance to the Chair and secretariat.

Guest participants may be invited to contribute to meetings from time to time by the Chair or secretariat (usually to provide subject matter expertise).

Proxies are permitted with the advance agreement of the Chair.

Papers and key messages

Meeting papers will be distributed at least 5 business days before a meeting.

Final key messages will be distributed to members within 6 weeks of a meeting.

Final key messages will be published on [ATO's Software Developers](#) website as soon as possible.

