



Australian Government

Australian Taxation Office

AUSkey in the Cloud

Solution and transition requirements

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In line with the feedback provided by Software Providers and the issues and concerns raised around the use of AUSKey in the cloud, this presentation aims to:

- Communicate the preferred model and implementation timeframe to enable AUSKey in the cloud
- Table a proposed transition timeline to move all cloud software to the model
- Highlight key requirements that address legal and technical requirements impacting AUSKey in the cloud
- Obtain feedback on these areas of focus from Software Providers

There have been a number of engagements with Software Providers to discuss current AUSKey in the cloud issues. At the last SRAM (17 September 2014) ATO presented a number of compliant and non-compliant AUSKey in the cloud models as shown below, since then the ATO has been working closely with other agencies to refine and finalise the preferred model.

User Authorises Provider's AUSKey



The provider's device AUSKey in the cloud is given permission to transmit on behalf of the client.

Concern:

- Concentration of authority in one credential
- Associating the authority provided to a client record with the provider
- Providers need to manage access to admin AUSKeys

User Authorises Device AUSKey to Provider



Concerns:

- Concentration of credentials in one place.
- Impost of authorising AUSKey.
- Possibility of misuse with an agency that has insufficient access controls.
- Associating the AUSKey received by the provider with the client record

User Authorises the issue of a Standard AUSKey to the Provider



Concerns:

- Concentration of credentials in one place.
- Impost of authorising AUSKey.
- Possibility of misuse with an agency that has insufficient access controls.
- Issue of individual credential to non-individual entity.
- Associating the AUSKey received by the provider with the client record

Upload User's Admin AUSKey to Provider Cloud



Concerns:

- Loss of identity integrity (someone else has control over the AUSKey)
- Key usable with any agency for any purpose
- Possibility of theft in transit

Upload Standard AUSKey to Provider Cloud



Concerns:

- Concentration of credentials in one place.
- Impost of authorising AUSKey.
- Possibility of misuse with an agency that has insufficient access controls
- Possibility of theft in transit

Upload Device AUSKey to Provider Cloud

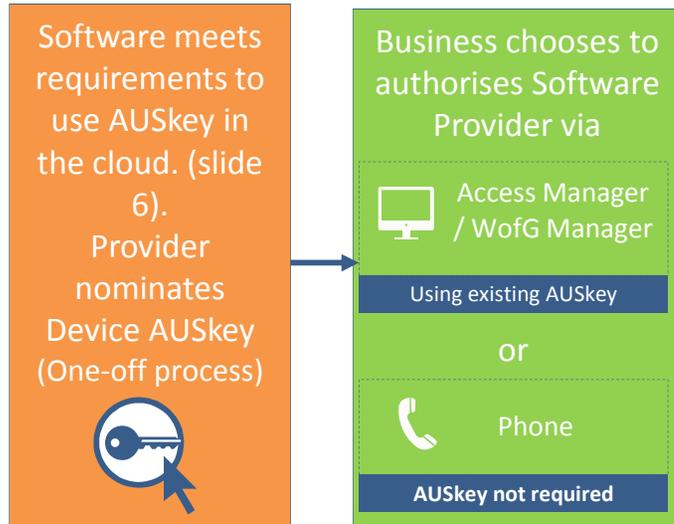


Concerns:

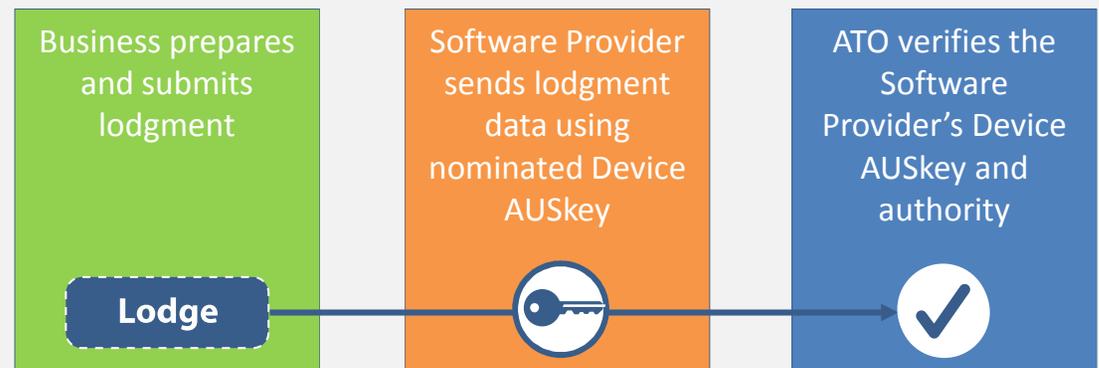
- Concentration of credentials in one place.
- Impost of authorising AUSKey.
- Possibility of misuse with an agency that has insufficient access controls
- Possibility of theft in transit

AUSKey in the cloud solution

Set up and authorisation



Lodgment

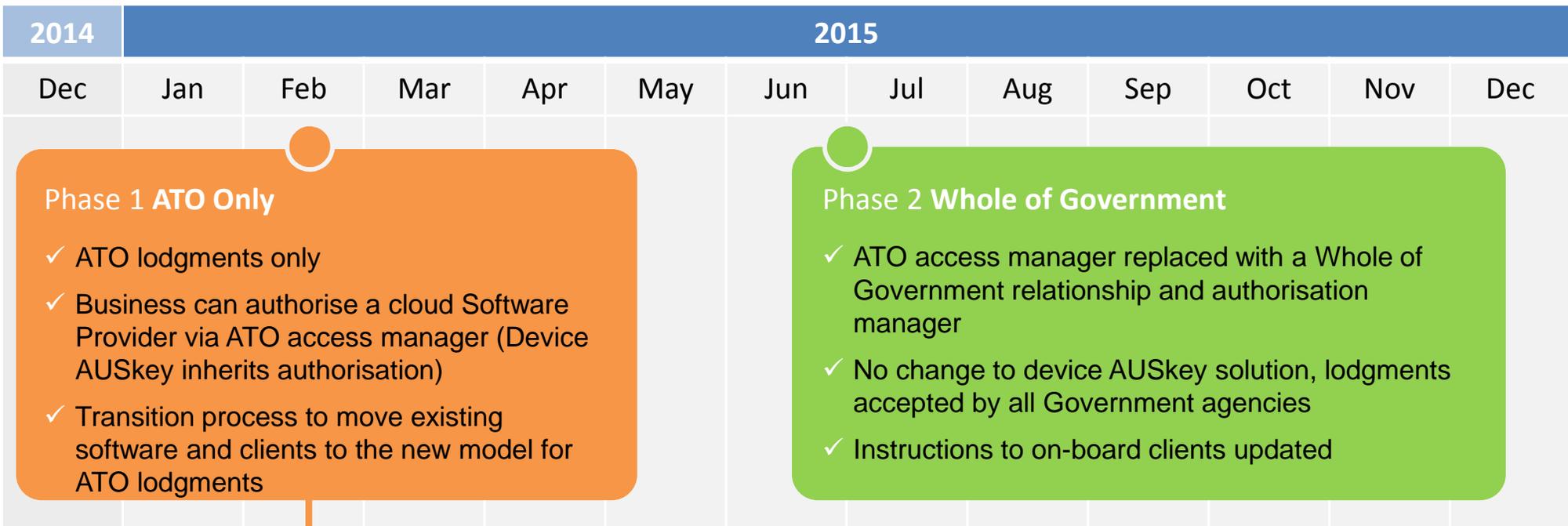


- ✓ Simplified on-boarding process for the business client offering them choice during transition/on-boarding on how to nominate a cloud Software Provider
- ✓ Businesses do not need to register for and obtain an AUSKey in order to authorise a Software Provider and transact in cloud, maximising take up of these services
- ✓ Device AUSKey nomination by the Software Provider is only required once using an existing Administrator AUSKey (in Access Manager)
- ✓ Software Providers can nominate multiple device AUSKeys if required
- ✓ Dedicated Device AUSKey limits the potential for fraudulent access by unauthorised individuals
- ✓ No concentration of AUSKeys in a single location
- ✓ Compliant with current policy
- ✓ Addresses feedback from Software Providers on providing clarity on this issue

Implementation timeline and proposed transition

Below outlines the solution implementation timeline and also proposes a transition timeframe for discussion with Software Providers.

ATO and Whole of Government Implementation Timeline



Proposed Transition for Software Providers – For Discussion

Phase 1: All cloud software models transition existing and new users to the preferred model by July 2015.

To do this Software Providers are required to:

- ✓ Satisfy the requirements outlined on slide 6
- ✓ Setup device AUSKey to transmit client lodgments
- ✓ Transition existing clients to the model
- ✓ Update on-boarding process for new clients

Phase 2:

- Instructions for clients to nominate a cloud Software Provider will need updating

Requirements for AUSKey in the cloud

The following reinforces key requirements as set out in the SBR Message Implementation Guide that must be adhered to for use of AUSKey in the cloud. In addition three new requirements have been included that Software Providers will also need to ensure are built into their software. Software Providers will need to declare they are meeting these requirements in order to use AUSKey in the cloud.

Current Requirements

1	Prior to lodging a form a user (business representative or authorised intermediary) must provide an appropriate declaration as outlined in the SBR Message Implementation Guide.
2	Lodgments from a Registered Agent user must include the Registered Agent Number (RAN) as outlined in the SBR Message Implementation Guide.

New Requirements

3	Software terms and conditions must describe the role of a software provider (i.e. not an agent, lodger or authorised to prepare lodgments. Secure transmission service only). Wording will be provided to support this.
4	Upon authentication the software must recognise the role of the user (e.g. Authorised business representative or intermediary). This should determine what information the user is authorised to access and what functions they are able to undertake (for example must recognise the difference between an authorised representative and an intermediary).
5 ?	<i>There is a question if the Registered Agent's ABN should also be transmitted as part of the lodgment data when lodging from cloud on behalf of a client. This may be required to ensure the business has authority to lodge from the Registered Agent Number. This requirement is currently being assessed.</i>

ATO

Incorporate feedback and finalise transition strategy and timeline

Support Software Providers to set up systems and processes to be able to transition to the AUSkey in the cloud model

Provide regular status updates to Software Providers on the progress of the February 2015 ATO deliverable

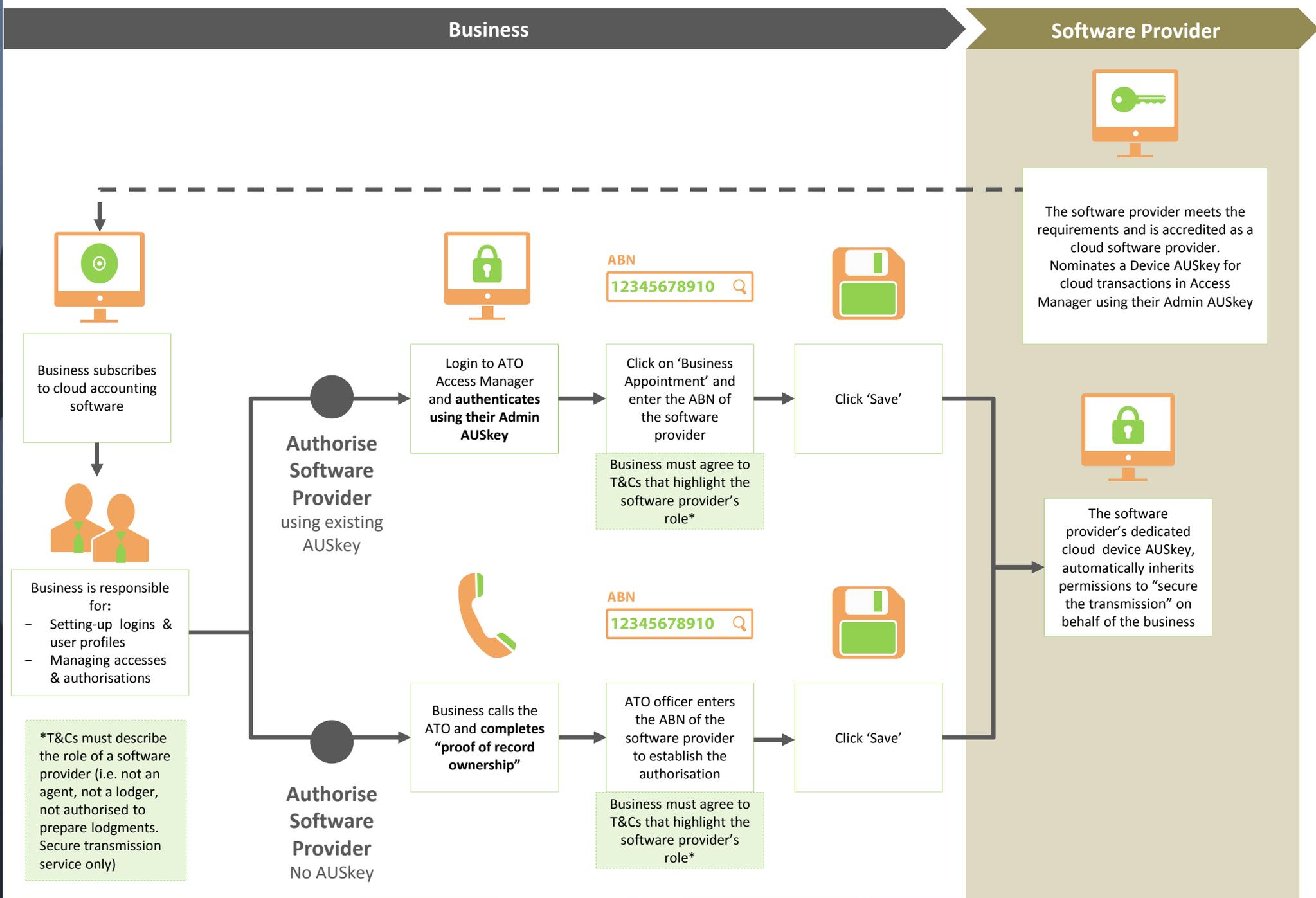
Software Providers

Provide feedback and highlight any show stoppers

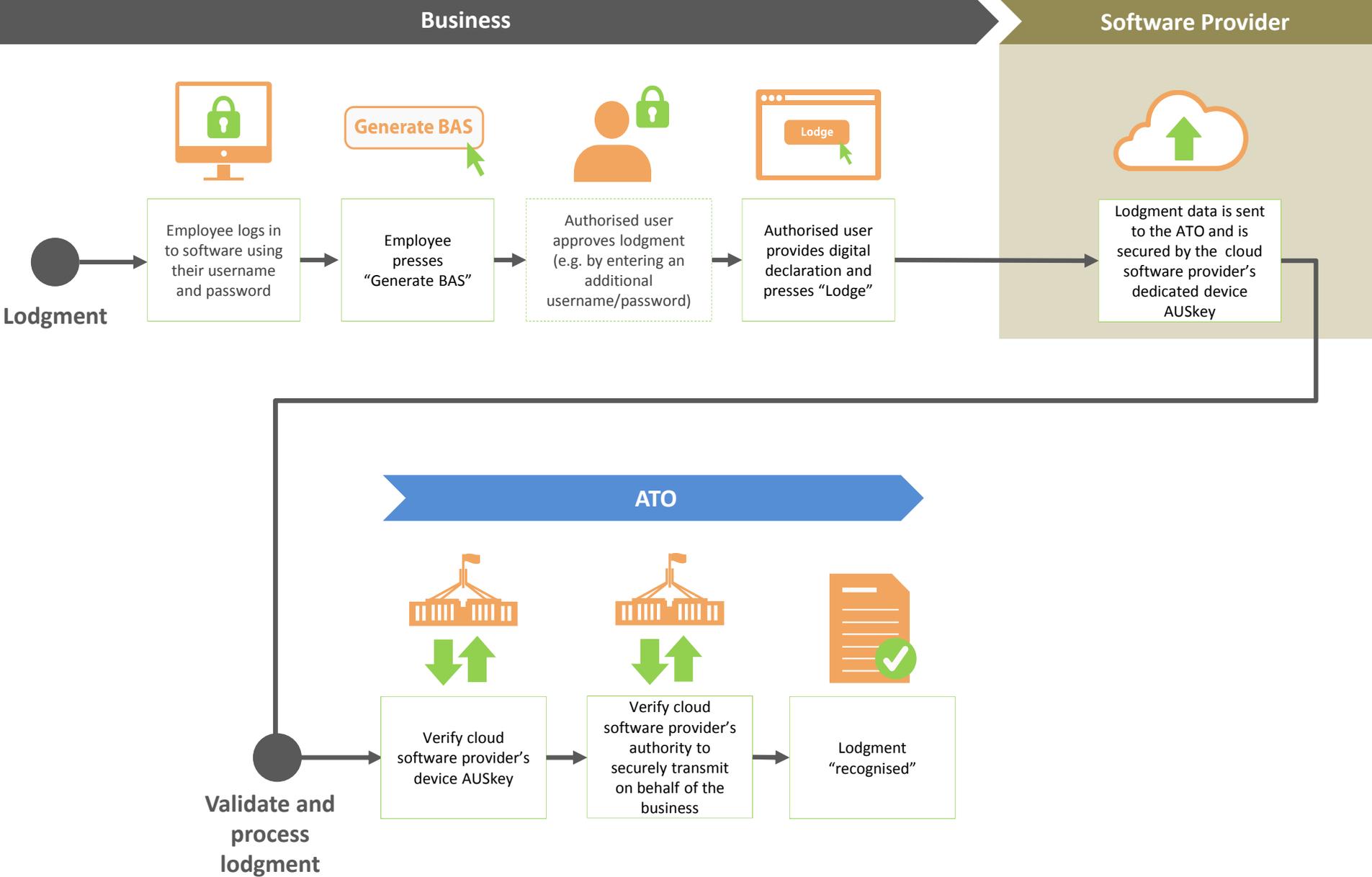
Prepare systems and procedures to:

- meet requirements,
- transmit client lodgments using the nominated Device AUSkey, and
- transition users.

Cloud software set-up and appointment – ATO Only



Scenario 1: Lodgment by "business" using cloud software



Scenario 2: Lodgment via Registered Agent in the cloud

