13th of August, 2018

Attn: Matthew Sedgwick
Consumer and Corporations Policy Division
The Treasury
Langton Crescent
Parkes ACT 2600

RE: Modernising Business Registers (July 2018)

Dear Matthew,

We are writing in response to the roundtable discussion held on the 5th of July, for the Modernising Business Registers program.

Please find attached responses to each of the consultation questions raised during the discussion and Program document.

Corbel Tech is a technology company focused on innovating business processes through secure software development and hosted cloud services. Our experiences include working with industry leading law firms, to develop applications which capture data associated with the Business Registers.

We believe that Corbel can be a substantial contributor to the further discussion regarding design and implementation of the Modernised Business Registry service.

We look forward to hearing from you in due course.

Kind regards,

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1. **What flexibility would you like to see introduced into the relevant legislation?**

   a. Changes made to the legislation which support a fully digital register

   b. Changes to allow a single Registrar to manage and own the consolidated registers

   c. Improve the methods of communication to re-align with current communication streams accepted in today's society.

2. **What modern services should be provided for Australia's business registers?**

   a. The lack of a centralised user centric portal is the greatest current inhibitor for user adoption. This primarily relates to the time it takes to work out where to start and how to complete the action that is required. Having the ability to see all the data associated with all core registers from a single portal would trigger a change in user experience from the current complexity and confusion associated with the existing registers.

   b. Improving the data and improving the user experience could also reduce the requirement of current 3rd party applications possibly reducing search requirements and associated resource costs.

   c. A mobile application, with appropriate security, that allows the user to manage and review status of submissions, receive updates on renewals, or search data associated with the logged-on user.

   d. Notifications sent across multiple forms of communication, such as email, SMS, in Mobile App Notifications, for renewals

   e. The ability for Accounting Firms to manage all their client records from within the Registry retail platform. This could be a chargeable service.

3. **What services should be provided to allow direct connection from business systems to the registers?**

   a. A managed API gateway which is fully documented and governed, allowing 3rd party software developers to design, build, and test their registry interactions before committing to the API fee structure and going live.

   b. Allow testing of 3rd Party Software to be free, or with low fees applied, to reduce barriers when testing and developing innovative ideas.

   c. Allow for business systems to obtain approval from users which would then permit the business to submit changes to some registry data on behalf of the user.

   d. Allow legal firms to process changes and updates to data within the consolidated registers and be seen as assisting in the maintenance and accuracy of data.

4. **What interactions with the Registers should be considered to improve the quality of the registry data?**

   a. De-duplicate data within the registers and sync, or link to, data that is already held by the government. This would allow for data to be stored only once and becomes the master data, rather than having to manage multiple instances of the same data. This may include integrating with Whole of Government services for identification, personal information, addresses, payment methods, etc.

   b. Allow users and authorized representatives of users to receive notifications when logged into the new Business Register portal, requesting the user/authorized rep to approve the recent changes in different areas of the government. This may also apply to third party businesses integrating with the register, when data relating to business is changing in an accounting software, it can also be updated in the register via API.

5. **What interactions should be considered to ensure the registry data remains up to date?**

    a. Cross checking registry information with Whole of Government services for verification of current addresses.

    b. Allow 3rd party software providers to update data on behalf of the user/business. This would aid in the management of data and increase the accuracy.

    c. Allow businesses such as law firms to connect directly and update data in the Register obtained through client interactions and processing of matters.

6. **How do you consider registration, annual review and renewal processes could be improved?**

    a. Allow payment methods to be stored for auto renewal of some registration services. This would prevent the administration associated with registrations being incorrectly cancelled due to communications not being received correctly.

    b. Streamline the business process to allow renewal processes to be completed within a few clicks. That includes, payment charged to stored payment details

7. **How do you consider search functions within the Registers could be improved?**

    a. Allowing users to build their own search queries would be most beneficial. When data is being added to the registers, it should be marked as searchable or non-searchable. This would allow users to build searches and queries based on available fields.

8. **What types of API users could the Charging Framework appropriately apply to?**

    a. The majority of the resource usage costs for the current registers is associated with accommodating the large volume of searches being performed in the registries. Therefore, those types of API users who are performing broad searches would fall under the charging framework to cover payment of costs associated with their actions.

    b. Records directly edited by user approved 3rd party applications via the API should not be a chargeable transaction. This could be seen as a direct update to their personal records, as opposed to a random search for an ABN.

    c. 3rd Party software which is editing and updating the data could also be seen as assisting with maintaining data accuracy.

    d. Data that is updated by the user directly via the web or mobile app should not be chargeable.

9. **What fee structures should be considered if the charging framework could be applied? (per transaction or annual subscription)**

    a. To enable innovation, it would be best to provide a tiered fee structure based on the action being performed with the data as well as the volume of transactions. This fee structure may start in the lower tiers with monthly subscriptions for lower volumes and step up through higher tiers as manipulation and volume requirements increase. It would also be beneficial to have an enterprise level tier with annual subscription for full access and unlimited transactions.

10. **What access rules should be placed on API users to facilitate innovative use of registry data?**

    a. Ensure API users have 3rd party software certified by the Registrar or Registrar's certifying partner in order to maintain consistency of data manipulation.

    b. Cost of certification should be kept low to ensure easy entry into developing 3rd party software that enhances the use of registry data. High fees for certification is a deterrent for innovating new products using the Registrar's API.

   c. Another option would be to have tiered certification and auditing requirements which cover the different levels of data manipulation and volume of transactions as mentioned in question 9a.

   d. Applications which are updating data may be given a form of credit and reduce the chargeable amount for API usage as this would be seen as assisting in maintaining the accuracy of the data.

11. What level of identity verification should be required to obtain a DIN? Digital identity check? If not, what other means of ID check?

   a. Yes, the use of digital identification should be acceptable. This could include integration with GovPass (in future)

   b. Registrations should be performed entirely online, be fast, easy and accurate.

12. What is the most appropriate and efficient manner of gaining a director's consent before issuing a DIN?

   a. Verification process, via email or through the Registration Retail App. The verification process would need to verify through sending a code to assigned mobile number.

   b. This form of authentication and verification is common place today. Most systems, such as banking, require a verification code sent to a mobile associated to the account before a transaction can be made.

13. Should law allow for authorized agents to apply for a DIN on behalf of their clients?

   a. Yes, apply only, before activation of the DIN the director should need to approve the application digitally in person. I.e. multi factor authentication before approval takes place.

14. What DIN related data should be made publicly and privately available? (only available to regulators)

a. The director should be able to restrict all information from being made available to the public.

b. The data that should be made public, would be the data seen as reducing risk of other entities being impacted by dealings with the business in question. If the business is insolvent or has been involved misconduct, then other businesses should be able to find out before engaging in business relationships.

c. There could be privacy issues related to the DIN if the DIN becomes a form of identification in the future, if so, it could then be for identity theft.

Thank you once again for the invitation to participate in the round table discussions and also submit these responses to your questions. I sincerely hope they help you progress in the program.

Kind regards,

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