# Modernising Business Registry Services

# Response to Discussion Paper

(Contains extracts of discussion paper)

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the Government is considering options to streamline key business registry functions and upgrade IT infrastructure to provide more user-friendly, modern registry services.

The purpose of this document is

- propose a vision for the modernisation of registry services
- understand where there are opportunities to deliver more for users,
- increasing the openness of register data.
- understanding the potential impacts of bringing together ASIC registers and the ABR.

### Scope

As a first step, the Government is considering options to improve the 31 registers (including the Companies Register and the Business Names Register) managed by the Australian Securities and Investments Commission (ASIC), and the Australian Business Register (ABR).

Other registers, including those administered by state and territory governments, are out of scope of this discussion paper.

#### **Consultation Process**

consultation will examine several different elements of the modernisation of business registers, including technology, governance, user experience, data accessibility and legislation.

# **Consultation questions**

What do you see as the main strengths with existing business registry services? How does this support your business?

>the trend to online registry is correct, online access, update is good

What do you see as the main weaknesses with existing business registry services? Does this significantly impact on your business (e.g. time or costs)?

- >you don't know what you don't know how would a person know where to find the numerous registries
- >Different interaction environments (user interfaces), different security credentials all make it complex
- >Level of spam and scam pretending to be the respective authorities could be mitigated by ensuring a person known which site to access for any interaction with the authority
- >essential need to develop appropriate notification systems. Maybe in conjunction with an App so that there is security in the sending of notifications and responding to them. Current behaviour of some agencies to send an email requiring secure login to simply get a monthly newsletter distracts from essential business interactions.

What would you like modernised business registry services to deliver for you in the future? How

would you prioritise these?

- >online
- >single entry point
- >App driven notifications
- >Multi use of similar information
- >One update fixes multiple registries
- >Enable registered Agent portal and Practice system access (not necessarily just tax) We are desperately in need for a Relationship Management System for tax office but given the breadth of this discussion the concept extends to all elements of a business's representatives.
- >All access and services to be provided in a wholesale capacity (through APIs probably) for commercial software to establish a connection to the registry/s. Appropriate security to be put into place. Appropriate authorisations to be in place.

What would be the advantages of bringing together the ASIC registers and the ABR within a single agency? How might this impact businesses, intermediaries or other users? Do you have concerns about a single agency being responsible for consolidated registry services?

- >see all the comments above
- >Cost reduction: time to control and interact for the business person or their agent. Fee reduction as only one government service to be maintained to maintain/monitor/control.
- >It currently does not make sense that an entity must consider more than one interface with government to update something as simple as an address. Having shifted business location recently the amount of different government interactions that are required to endeavour to ensure that all regulatory bodies that a business may interact with has been advised. Different departments all with different website and different consequences of not advising change of address: ASIC, ATO, ACNC, ABR, Workcover, Payroll Tax. If any are missed the consequences begin with penalties. The cost to business of separate registries is substantial.
- >The Australian economy is now well positioned to leverage off the journey to having a digital economy. Different registries exist due to history. We didn't have a connected environment we didn't have adequate computer power or software to handle ass amounts of data. We didn't have the ability to provide tailored but comprehensive usable interface to facilitate effective compliance of registry systems. Due to the historic manual or independent regimes we developed independent systems.
- >Todays computer technology and connection enables a brand new approach to a better united registry system. It just has to happen
- >This project should not just consider amalgamation or merger of existing registries but we would encourage government to start with a white page and consider a new approach to a new system that facilitates an efficient management of the different regimes but allows a business to efficiently tell you once to meet many different obligations.

Do you see other opportunities to reduce duplication of business registers and associated services

>above

What advantages or disadvantages would there be in a consolidated set of business data, for example in accessing data, updating business information, data confidentiality?

**Ø** Disadvantage is all the risk associated with one "big brother" system (or government) that opens up all the risk of centralised data, fraud, data breach, misuse.

Ø

Would more open and accessible registry data benefit business and/or the wider economy? How/why?

Do you have a view on the steps the Government could take to make registry data more open and accessible? For example, do you have a view on the format of data, frequency of data released, platforms for release, or pricing?

- Ø In todays environment of connected computer technology and far easier ability to request data and for a computer system to provide such data, it is now inappropriate that there is a cost to obtaining such data. Ie ASIC: it is no longer appropriate that company searches and the like require a third party service to be paid a fee to access and render data to an enquiry.
- Ø A government provided services should now be able to provide data in a form that is able to be read and used by external reporting programs, and hence each user would be customising their own use and style of report. Government should also be proving the data in a readable form.

Is there business data that would be useful to collect in a modernised registry service, but currently is not being collected or published? Do you have concerns about the publication of certain data?

Is there any information currently collected by the Commonwealth that is, in your view, redundant?

>ABS reports, the collection system and the reporting system requires a massive overhaul.

Information confidentiality and security is paramount. Do you have a view on how security should be maintained, and/or how users can be empowered to manage permissions relating to their data held in registers?

Ø A major discussion point. It is well past time for the Australian Government to step up and actually deliver the solutions behind your question. It is a much larger discussion and there have been many government announcements and investment in proposing (developing) solutions without proper consultation and also that have not delivered any benefit to aachieving a better environment. We are aware of existing discussions and initiatives of the DTA and the ATO around this topic.

What are the implications for business of changes to the way registers are currently delivered? For example, the cost of updating systems, products, or changes to any customer services?

>the cost of using the state of the art best solutions to interact with inefficient systems is immense. The implications in our view should all be positive if co-designed with industry.

We understand any changes may impact your business and sufficient lead time will be required. How would you like to be involved in any future changes?

>The ICB represents intermediaries and mostly small business. The changes will impact our role and our environment. We would welcome the opportunity to be involved in scoping the issues

and the solutions and involvement in the co-design with you of the solutions.

If government does this alone, it will fail. The Government view alone is NOT sufficient and therefore the solution must be achieved in co design

Noting my role as Deputy Chair of the Digital Business Council, We implore you to look at the collaboration co-design model developed by the Council in designing the interoperability framework for the einvoicing standards. This model ass evolved into an Agile co-design model being utilised by the Single Touch Payroll project of the ATO and now being embraced by other sectors of the ATO. Please consider. As one of the main supporters of the development of this co-design model we would welcome the opportunity to discuss this with you.

How long would parallel services (new and old) be required for you to transition your software and customers?

Our dream would involve the development of a new centralised registry that over time would replace the existing systems. Accordingly allowing the existing systems to remain but the new technology and new delivery would result in a change of government and business behanviour and use of the existing services. The ability to switch off old services would become evident.