



Australian Government



Australian  
**Small Business** and  
**Family Enterprise**  
Ombudsman

6 April 2021

Mr Matthew Sedgwick  
Data Economy Unit  
Market Conduct Division  
The Treasury  
Langton Crescent  
Parkes ACT 2600

*via email: [regmod@treasury.gov.au](mailto:regmod@treasury.gov.au)*

Dear Mr Sedgwick

**Modernising Business Registers program**

We support the Modernising Business Registers program and the new director ID regime. We make the following specific comments in respect of the draft data standard.

- 1. Make it accessible and easy.** Small business owners carry responsibility for many roles within a business and do not have the time or resources of big businesses. The compliance burden is even higher for small incorporated businesses. Any regime that requires an application form and the provision of data and documents to the Government should therefore be accessible, simple to understand, easy to get right first time and the result delivered in an efficient and timely way. With this in mind, Government data should be sharable by default. This would enable Government to, for example, use its existing data to pre-fill applications for director IDs.
- 2. Ensure reciprocal service standards.** We often hear complaints from small business owners engaging with Government that they are required to provide documents or material within a relatively short time frame (14 days) while Government takes much longer to process that information or respond. This is particularly important in light of the future requirement for an individual to hold a director ID *before* appointment as a Director (when the appointment occurs after 12 months from the commencement date of the register). Service standards are critical especially where engagement is not through the electronic platform provided. To support efficient processing of paper forms, the paper application should be machine readable. Government should also send a copy of the machine-read record to the applicant to confirm the data is accurate.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Ms Louise Stuart-Watt on 02 8234 2623 or by email to [Louise.Stuart-Watt@asbfeo.gov.au](mailto:Louise.Stuart-Watt@asbfeo.gov.au).

Yours sincerely

**The Hon. Bruce Billson**  
Australian Small Business and Family Enterprise Ombudsman

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