



8 April 2021

Data Economy Unit  
Market Conduct Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

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

Dear Sir/Madam,

### **Consultation — Modernising Business Registers Program**

As a major Credit Reporting Body within the Australian credit landscape, illion (formerly Dun & Bradstreet Australia and New Zealand) illion welcomes the opportunity to provide feedback to Treasury's Modernising Business Registers (**MBR**) Program consultation.

illion fully supports the Commonwealth Government's objectives, to modernise the Government's business registers and provide a business case to provide options for improving the integrity and accessibility of business information and increasing the efficiency of registry services.

In particular, illion is very supportive of the objective to improve the quality, trustworthiness and accessibility of business data.

We believe that having access to high quality, up-to-date business data not only provides a macroeconomic benefit to the business community but also helps to provide our customers with trusted insights on Australian businesses.

illion does, however, hold some concern regarding the accessibility of data once an effective director ID regime is in operation.

### **About illion**

illion is the leading independent provider of data and analytics products and services across Australasia. The organisation's consumer and commercial credit registries make up a central component of Australia and New Zealand's financial infrastructure and are used to deliver end-to-end customer management solutions to clients. illion provide extensive solutions to reporting entities in Australia that help the reporting entities meet their AML KYC obligations across individuals and non-individuals at onboarding and through the customers lifetime.

## **Accessibility**

illion welcomes the Government's intent to allow the management of registry information to be more flexible and to evolve as technologies change.

Specifically, we strongly believe that access to data should be increased, not restricted.

Historically, the quality of the Director data in the ASIC registers, due to the lack of checking on data provided to ASIC, has been an enabler of fraudulent activities such as Phoenixing. Introducing a process of rigorous checks on identify as part of the Director registration process will make fraudulent behaviour easier to detect and prevent, enhancing economic activity and reducing economic losses for businesses through fraud and business misconduct.

Our primary concerns rest with access to the information held on Directors and effectiveness of this access (as intended) once the director ID regime is in place.

Reporting entities in Australia are required to identify and verify Ultimate Beneficial Owners of businesses that they provide accounts to. UBOs are the individuals that benefit from a business (as benefiting from denotes control) and are typically considered to be the Directors of the business and individual shareholders with a shareholding of 25 per cent or more.

To identify these individuals the information on ASIC registers is critical, and that the information includes name, address and date of birth to enable the individuals to be verified to Anti-Money Laundering (AML) Safe Harbour standards. These standards require name and address (or name and DOB) to be verified against at least two independent, reliable, third-party data sets. To meet these requirements it is therefore critical that the directors name, address and date of birth are available through the ASIC register to parties performing AML verification exercises.

It should be noted that implementing significant changes into the systems and processes of business information and analytics firms, such as illion, will require time and resources, particularly for changing data structures and models.

## **Electronic Identity Verification**

illion provides an electronic ID verification solution used by AML reporting entities to verify individuals. The ASIC professional data sets provide a useful independent, reliable and third-party data source to be used in verifying individuals. If name, address and DOB were not available for verification, there would be a flow-on impact for the matching rates for electronic ID verification in Australia.

Making this information available to ID providers is critical, removing this information from the register would be detrimental to the ID verification processes currently present in Australia. There are options that exist that allow for information to be redacted from the public register but still available for ID verification, for example ID verification could be achieved through specific APIs as per the DVS API which returns match no match results without revealing the actual information stored for a Director.

## **Reliability**

illion is fully supportive of the objectives of the MBR Program, particularly looking at streamlining and making more user-centric the way in which businesses meet their obligations and maintain the data held by government as part of the normal course of business.

Modernising services and updating ageing infrastructure, we believe, will increase stability of services – a crucial point for business generally, and for business information/analytics firms such as illion. Dealing with the ageing infrastructure of the registers in attempting to access customised data is a daily challenge for our business.

Furthermore, modern services should allow for large and sophisticated users of the registry data to access greater data through customised and automated extracts that will allow them to purchase the data elements that they require allowing a user of the registry to buy what they want, not what the registry sell. This should be at a price that reflects the breadth and depth of data purchased (e.g. tiered or volume discounts).

The current registry is highly unreliable to serve a digital economy and the frequent outages cause significant issues for our customers. We would expect any modern registry to be run like a high availability commercial platform with minimal outages, scheduled in advance and at times convenient for your customers.

Finally, the timeliness in which documents are lodged and processed by ASIC, as well as the process through which documents are time and date stamped, can be frustratingly long and damaging to our business.

Better stability of services, modernising ageing infrastructure and providing timely access to data will greatly improve connection from business systems to the registers.

## **Conclusion**

The MBR Program provides an opportunity for the Registrar to partner with the private sector to ensure gaps on the registers are regularly updated and that appropriate checks and balances are in place.

As Australia's corporate, markets and financial services regulator, ASIC should not fear working with the private sector to improve the quality and efficiency of the registers.

illion would encourage and welcome an approach to assist ASIC for this process, particularly on our processes for single identifier and how we manage and maintain the quality and integrity of our data.

It should be far easier and frictionless for businesses to ensure their registry data is up to date.

Exploring user friendly online options to streamline the registry updating process would have our full support.

illion believes that the search functions that are provided to the larger users of the registry should allow for the customisation of the data criteria by which they search as well as the data packet that is returned.

Additionally, the current search capabilities restrict organisations from conducting large scale searches as, we have found, the performance is substandard. Future search functions should offer faster response times and allow for more efficient processing.

We fully support the Government's commitment to open data and support the view that providing access to appropriately anonymised government data will produce broader economic benefit and encourage innovation.

Should you have any questions or concerns arising from this submission, please feel free to contact Richard Atkinson, General Manager – Consumer Risk and AML at any time via [Richard.Atkinson@illion.com.au](mailto:Richard.Atkinson@illion.com.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Richard Atkinson', with a large, sweeping flourish extending to the right.

**Richard Atkinson**  
**General Manager, Consumer Bureau**