



18 March 2021

Our ref: 1000\_director identification number treasury submission

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

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

**Submission regarding Modernising Business Registers Program (commencement of the director ID regime)**

Dear Sir/Madam

On behalf of SM Solvency Accountants, an insolvency practice providing corporate and personal insolvency administration services nationally, I submit the following feedback in regard to proposed processes for introducing a Director Identification Number (director ID) regime as part of the Federal Government's Modernising Business Registers Program.

The feedback relates to the Information an applicant for a director ID will be required to provide.

We propose that consideration be given to including the following additional information within the declaration that an applicant for a director ID is required to provide: i) a declaration that they are not an undischarged bankrupt or otherwise prohibited or disqualified from acting as a company director, and ii) a declaration that they have a suitable proficiency with the English language or otherwise will retain the services of a suitable translator or adviser to assist with their understanding of Australian laws and generally undertaking business activities within Australia.

Also, we suggest that the application include a statement about resources for assistance if applicant individuals are being unduly coerced into becoming a company director and/or if applicant individuals do not understand what becoming a company director means and/or if applicant individuals require assistance finding out about Australian legislation (in particular in languages other than English).

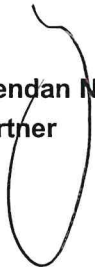
The above-mentioned proposals are designed to protect potentially vulnerable members of the community by ensuring they are suitably informed (at least to a basic level) prior to committing to act as company directors, and that they are provided with resources for assistance if there is any coercion being applied (such as pressure from a family member).

Thank-you for the opportunity to provide feedback.

Should you wish to discuss this submission, please contact myself on 07 3308 4910  
[b.nixon@smsolvency.com.au](mailto:b.nixon@smsolvency.com.au)

Yours faithfully

**Brendan Nixon**  
**Partner**



Solvency Accountants