



21 December 2017

Senator McAllister
Chair
Senate Finance and Public Administration References Committee
PO Box 6100
Parliament House
Canberra ACT 2600

By email: fpa.sen@aph.gov.au

Jenny
Dear Senator McAllister

RE: DIGITAL DELIVERY OF GOVERNMENT SERVICES

Thank you for the opportunity to submit comments to the above Inquiry.

ASBFEO has two primary functions – advocating for and assisting small business and family enterprise. In performing the advocacy function, the office reviews key policies and laws which impact on small business, such as the matter now before the Senate Inquiry on the digital delivery of government services.

The missing, critical, consideration of the Inquiry is ease of access for the intended user. As small businesses digitise their business they need to be able to seamlessly connect to government platforms to submit required compliance and regulatory information. Any digital delivery of government services must be technology neutral to allow small business to interact with the platform.

For example, a recent complaint we received noted the planned changes to the Government's Small Business Superannuation Clearing House (SBSCH) arrangements. The SBSCH will join existing ATO online services in its Business Portal in early 2018. The small business owner will now be required to use the Business Portal using an AUSkey which, from past experience, takes 2.5 days to lodge employee Payment Summaries compared to 10 minutes to lodge paper returns.

AUSkey

The most frequent concern raised by small businesses is that AUSkey, while compatible with many browsers, is not compatible with common operating systems. Common tools used such as Microsoft edge browsers, Chrome operating system, Android and Apple mobile devices are not compatible with AUSkey. Similarly, many participating government online services are not Linux compatible. Linux provides free and open-sourced software allowing small businesses to digitise with minimal cost.

These concerns were recently raised by a small business which runs Firefox and Chrome on Linux and does not have any Window machines. AUSkey requires them to run a third-party plug-in, NSAPI (sitting on Java) on his Linux platform. NSAPI requires security patches but support for NSAPI is being phased out. Without changing their digital tools, once support is phased out they will not be able to obtain security updates and will have an increased risk of cyber attacks to comply with government regulations.

Similarly the implementation of the single-touch payroll scheme from 2019. The platform will require small business to use standard business reporting (SBR)-enabled software. This scheme will be mandatory and require small businesses to invest in new software which may or may not be compatible with their existing operating system.

Small Business Digital Taskforce

I would refer the committee to the Small Business Digital Taskforce that was established by the Federal Government in November 2017. The taskforce is working with small businesses to adopt digital tools as evidence indicates digitisation creates growth opportunities.

Any benefit that could be achieved by a small business digitising will be diminished if a government service they must use is incompatible, difficult to access or use and lacks the necessary information for a small business to comply.

It is critical that the digital service standards established by the government's Digital Transformation Agency are met, not only at launch, but over the life of a service. As AUSkey demonstrates, rapid changes in technology require constant assessment of services against the standards to ensure they remain accessible and user-centered through consistent and responsive design that adapts to changing technology.

Please feel free to contact either myself or Mrs Jill Lawrence on
if you would like to discuss this submission or require
further details.

Yours sincerely,

Kate Carnell AO

Australian Small Business and Family Enterprise Ombudsman