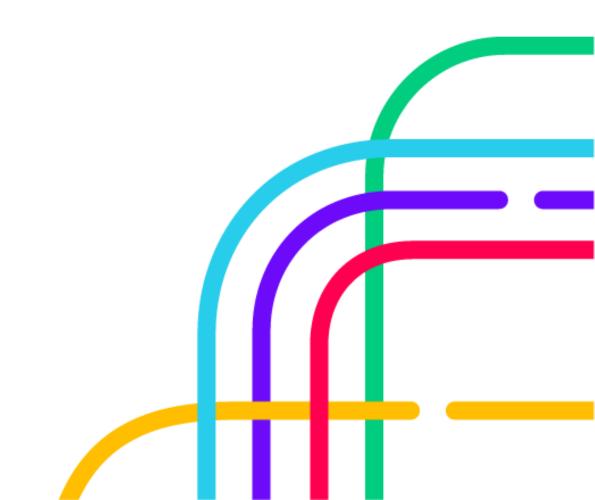
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Annual Report

2024-25

Published 27 November 2025



Contents

Contents	1
Executive Summary	2
President's Report	5
About DSPANZ	8
Our Members	9
2025 Board of Directors	10
Financial Report	11
The State of the Business Software Industry	16
Member Engagement	19
Our Work With Government	24
Policy & Advocacy	31
Looking Ahead	33
Appendix - Acronyms & Glossary	34

DSPANZ acknowledges the Traditional Owners of Country throughout Australia and recognises their continuing connection to land, waters and culture. We pay our respects to their Elders past and present. We also acknowledge Māori as tangata whenua and Treaty of Waitangi partners in Aotearoa New Zealand.

Executive Summary

The 2024-25 year was a year of anticipation and groundwork for Digital Service Providers (DSPs) and the broader business software sector across Australia and Aotearoa New Zealand. Governments on both sides of the Tasman are progressing reforms that will ultimately be delivered through software experiences, while the scale and pace of change continue to grow. DSPs are increasingly expected to implement complex policy and system updates faster, within tighter consultation windows and an evolving regulatory environment.

Against this backdrop, DSPANZ remained focused on our mission: supporting a world-class business software sector and connecting government with industry to solve challenges together. We continued to act as a trusted intermediary, translating policy ambition into deliverable software requirements and advocating for realism in implementation timeframes, security expectations, and ecosystem readiness.

Our partnerships with the Australian Taxation Office (ATO) and Inland Revenue (IR) remained central to our work. Through co-chairing and participating in key forum - including the ATO DSP Strategic Working Group, ATO DSP Architecture Reference Group, and the New Zealand Digital Advisory Group - we helped shape the future direction of tax administration, API ecosystems, cybersecurity uplift, digital identity alignment, and elnvoicing interoperability. A milestone in 2024-25 was the first joint workshop between ATO and IR DSP working groups, reflecting the increasingly trans-Tasman nature of the sector and enabling shared roadmap discussions.

Payday Super remained one of the most significant reforms affecting the payroll and superannuation ecosystem in Australia. With legislation passed in November 2025 and commencement set for 1 July 2026, DSPANZ participated in intensive consultation across Treasury and ATO working groups, and supported members to influence draft legislation, SuperStream standards, and Single Touch Payroll (STP) data changes. As technical documents and readiness milestones were released, we ensured DSPs had consistent insight into what implementation would require across products, customers, and system interfaces.

Through our partnership with Australian Payments Plus (AP+), DSPANZ continued to shape the future of payments to support payroll and superannuation needs. The <u>Payments Working Group</u> focused on New Payments Platform (NPP) adoption, overlay services, bulk payments capability, improved reconciliation, and the implications of BECS decommissioning. Three major member workshops and a series of "Hour of Power" bank briefings supported practical co-design and strengthened industry readiness.

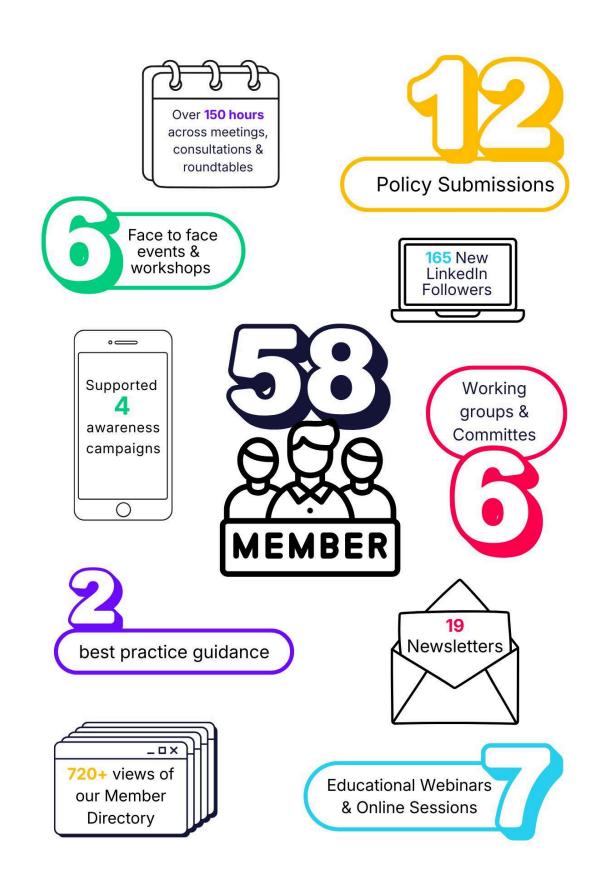
Security, privacy, and digital identity were another defining focus of 2024-25. DSPANZ published the <u>Security Storage and Management of TFNs and Personal Information Best Practice Guidance</u> and progressed work to broaden expectations for best practices in identity verification and digital identity in software. The <u>Digital Identity Working Group</u> was established to reduce reliance on physical identity documents, minimise unnecessary

collection of personal information, and promote safer verification models. In parallel, our <u>Security Committee</u> delivered a comprehensive <u>Security Incident Reporting Guide</u> and webinars that strengthened member capability in navigating multi-agency reporting and "secure by design" practices.

DSPANZ also undertook an independent review of our operations and future strategy, recognising shifts in our traditional membership base and the need to position the organisation sustainably for the next phase of digital and regulatory change.

Member engagement remained strong throughout the year. Members contributed over 150 hours to DSPANZ meetings and working groups, participated in policy briefings and webinars, and relied on our budget breakdowns and measure-tracking resources to stay ahead of reform impacts. This participation underscores the value of DSPANZ as a practical, member-driven forum for collaboration, co-design, and advocacy.

Overall, this Annual Report captures a year in which DSPANZ helped the sector prepare for significant reforms, strengthened trans-Tasman collaboration, enhanced best-practice guidance on security and privacy, and ensured that DSP voices shaped the design and delivery of government change. As we look ahead, we remain committed to enabling deliverable policy outcomes, supporting members through implementation, and sustaining a secure, efficient digital ecosystem for businesses and government across Australia and Aotearoa New Zealand.



President's Report

The ongoing focus on productivity in Australia and Aotearoa New Zealand continues to emphasise the role of the business software sector in digitalising our economies and unlocking efficiencies for businesses and government on both sides of the Tasman.

The scale and pace of government-driven change continue to grow, alongside the expectation that DSPs deliver these changes to their customers faster, while navigating an increasingly complex regulatory environment.

The role of DSPANZ is more critical than ever as we navigate a period of significant change in how technology supports business and government operations. Our government peers recognise our role as an influential advocate for the business software industry, and we remain focused on ensuring the operational feasibility of new policy measures - from cost analysis and law development through to implementation and delivery.

2025 Key Activities & Events

- Payday Super: DSPANZ actively engaged in multiple consultation briefings with Treasury and an in-person meeting with the Assistant Treasurer, The Hon Dr Daniel Mulino, before the finalisation of legislation. After 2 years of advocacy, Payday Super legislation was passed in November.
- SuperStream and STP: DSPANZ has been a leading participant in co-design sessions
 with the ATO to identify the required changes to SuperStream data and payments
 standards, and to STP, to support the implementation of Payday Super. We now focus
 on implementation activities.
- Payment modernisation: We continue to partner with AP+ on the technical requirements for the NPP to support the unique payment needs of the payroll sector, including high-volume payments and single payments to multiple endpoints. We continue to advocate for reducing the cost of the NPP and ensuring that banks can support bulk payment processing, and DSPANZ has met with the Reserve Bank of Australia on this issue.
- Digital Identity Working Group: We established a new <u>Digital Identity Working Group</u>
 to focus on how DSPANZ can support our members (and their customers) in reducing
 the risks associated with storing identity documents in software and the benefits of
 adopting identity verification solutions.
- Best Practice Guidance: We published the <u>Secure Storage and Management of Tax File Numbers and Personal Information: Best Practice Guidance for Australian Business Software Providers</u> in January this year. Through the Digital Identity Working Group, we will also publish a second best practice guidance paper on privacy and identity verification before the end of the year.

- NZ Digital Advisory Group: The NZ Digital Advisory Group has focused on strengthening the collaboration between IR and DSPs in 2025, with a focus on simplifying tax processes, supporting digital identity innovation, and exploring new frameworks, such as Open Banking and the Consumer Data Right, to enhance the tax and social policy ecosystem.
- Review into DSPANZ operations: After more than 10 years of operating, the Board commissioned a review of DSPANZ. The business software sector has changed considerably over this time, with DSPANZ's traditional membership base (payroll, taxation, accounting and superannuation software providers) reducing in numbers. This review will assist the Board in setting a sustainable strategy to enable DSPANZ to flourish over the coming years.

Working relationship with the ATO

The ATO continues to be a key stakeholder for DSPANZ, with significant engagement throughout the year supporting the design of new measures, administrative operations, and consideration of requirements for the future of the tax and super system.

I would like to thank Matthew Prouse (Co-Chair of the Strategic Working Group) and Mike Behling (Co-Chair of the DSP Architecture Reference Group) for their leadership in both of these forums. I also acknowledge the considerable efforts of the Digital Partnership Office (DPO), working group secretariats and participating members for contributing to the continued success of these working groups.

Working relationship with New Zealand IR

Our relationship with IR continues to go from strength to strength, 4 years after officially launching DSPANZ in New Zealand. We are starting to see the benefits of co-designing policy and system changes that affect DSPs and ultimately the operation of the tax and social policy ecosystem.

I would like to thank our NZ Digital Advisory Group Co-Chair, Tim Kirkpatrick, for his leadership of this forum.

A thank you to our members and partners

DSPANZ would not be here without our members. Thank you for your continued patronage and for the interest and support you have shown in attending meetings, working groups, and our in-person events. Members are the lifeblood of our organisation. DSPANZ continues to focus on delivering services and experiences that our members value.

I would also like to thank Australian Payment Plus for their ongoing support of DSPANZ as we navigate changes in the payment eco-system. This partnership is now 3 years old and continues to show the benefits of working collaboratively with key industry stakeholders.

A thank you to the Board and staff

As you read the 2024-25 Annual Report, you will get an insight into the workings of DSPANZ. I am immensely proud of what DSPANZ has achieved with a small team of 2 staff, a volunteer Board of Directors, and an annual revenue of less than \$400,000.

My appreciation goes out to the Directors who have given up their time to chair our working groups and committees, including Simone Dixon and Paul Orford, who are supporting the Payroll Working Group, and Belinda Stewart and Charles Gillman, who are hosting the Security Committee. I am fortunate to have facilitated our Payments and Digital Identity working groups across 2025, represented DSPANZ at multiple public forums and had the opportunity to meet with many of our members along the way.

A big thank you to Maggie Leese, our Public Relations and Communication Manager, and Eden Treloar, our Member Support Officer, for supporting members and the Board this year.

It goes without saying that DSPANZ's performance is greater than the sum of its parts - a reflection on the dedication and commitment to the business software sector, especially of the Directors who have taken a leadership responsibility to progress core focus areas.

Looking ahead

2026 is shaping up to be another busy year for DSPANZ, with our focus moving to:

- Implementing and testing the SuperStream and STP changes to facilitate the introduction of Payday Super, as well as supporting customers with transitional arrangements.
- Payments modernisation to ensure NPP functionality and capability supports our needs and current use cases in preparation for the Bulk Electronic Clearing Service (BECS) decommissioning.
- Advocating for the adoption of identity verification solutions to replace the use of physical copies of identity documents.
- Security enhancements to the ATO's DSP Operational Security Framework and the introduction of an IR DSP Operational Security Framework.
- Expanded use of the Consumer Data Right across Australia and New Zealand.

As we move forward, we remain committed to supporting our members and stakeholders as they navigate the ever-changing digital landscape.

Our mission remains as relevant today as ever. DSPANZ will continue to advocate for practical, feasible and deliverable outcomes that benefit the broader business software sector.

Chris Denney

Signed by:

Chris Denney, DSPANZ President

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About DSPANZ

Digital Service Providers Australia New Zealand (DSPANZ) is the peak body representing the world-class business software sector in Australia and Aotearoa New Zealand.

Over the years, the business software industry has helped streamline and transform payroll, superannuation, tax, accounting and finance operations by delivering new, secure digital solutions. This work is helping to fuel the digital economy while improving user experiences and government policy outcomes.

DSPANZ has a proven track record of helping government agencies consult and work with the business software industry on significant policies and projects that require technology-led solutions.

Our Mission

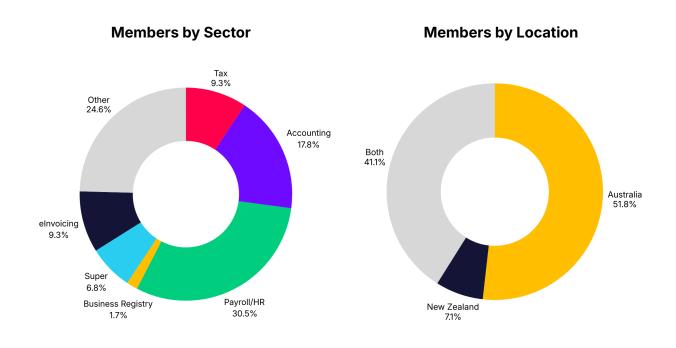
DSPANZ supports members in informing government policies and developing solutions that optimise business and economic outcomes in New Zealand and Australia.

We achieve our mission by:

- · Sharing knowledge, expertise and industry updates
- Building strong networks in Australia and New Zealand
- · Connecting government and industry to solve challenges together
- Engaging with the government on behalf of members to inform policy outcomes
- Enabling consultation for members on business to government and business to business initiatives.

Our Members

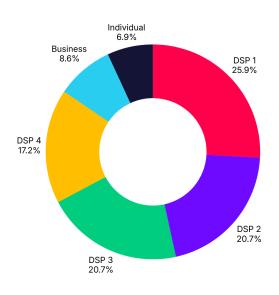
<u>Our members</u> are innovators who create the digital infrastructure that underpins modern business operations across Australia and Aotearoa New Zealand. DSPANZ members power over 90% of payroll, superannuation, and tax transactions, supporting organisations, employers, employees, and trusted advisors with their day-to-day business operations.



Members by Customer Focus

Government 12.2% Small Business 41.1% Large Business 46.7%

Members by Tier



2025 Board of Directors



Chris Denney
President & Director



Matthew Prouse Vice President & Director



Simone Dixon
Vice President & Director



Mike Behling **Secretary & Director**



Belinda Stewart Treasurer & Director



Charles Gillman **Director**



Collette Betts **Director**



Emily Curlewis **Director**



Erin Adams **Director**



Paul Orford **Director**

Financial Report

DSPANZ maintained a stable and sustainable financial position across 2024-25. Our overall income increased compared to the previous year, supported by stronger membership revenue and continued sponsorship funding. Operating expenditure remained consistent with prior periods, reflecting ongoing investment in staff capabilities, governance, and member-focused activities.

We returned to a modest surplus for the year, strengthening DSPANZ's overall financial position. Cash holdings and receivables remained healthy, and liabilities remained low, ensuring that DSPANZ is well placed to meet its operational and compliance obligations and, importantly, to continue actively working on behalf of member interests.

DSPANZ enters the 2025-26 financial year with a stable financial base and the capacity to continue delivering advocacy, industry engagement, and member services with confidence.

Please find copies of our profit and loss statement and balance sheet for 2024-25 over the following pages.

Profit and Loss

Australian Business Software Industry Association Limited For the year ended 30 June 2025

	30 June 2025	30 June 2024
Trading Income		
Business Memberships	6,000	4,200
Developer Memberships	329,434	188,692
Individual Membership	818	952
Sponsorships Received	50,000	50,000
Total Trading Income	386,252	243,843
Cost of Sales		
Conference - Operating Costs	-	-
Total Cost of Sales	-	-
Gross Profit	386,252	243,843
Other Income		
Donations - In Kind	-	602
Interest Income	7,177	1,856
Other Income		108
Total Other Income	7,117	2,566
Operating Expenses		
Directors Travel	9,684	9,972
Marketing and Advocacy	3,900	3,681
Operations	31,344	13,913
Other Expenses	1,831	549

	30 June 2025	30 June 2024
Staff Costs	210,763	200,264
Total Operating Expenses	257,523	228,379
Net Profit	135,908	18,030

Balance Sheet

Australian Business Software Industry Association Limited As at 30 June 2025

	30 June 2025	30 June 2024
Assets		
Bank		
DiviPay Expenses Account	-	-
Macquarie CMA	250,417	142,049
Stripe AUD	-	-
Westpac Community Account	16,645	2,930
Total Bank	267,061	144,979
Current Assets		
Accounts Receivable	32,558	32,193
Total Current Assets	32,558.33	32,193
Total Assets	299,620	177,173
Liabilities Current Liabilities		
Accounts Payable	-	-
GST	1,997	3,192
PAYGW Liability	4,815	9,581
Rounding	3	3
Stripe AUD	487	62
Total Current Liabilities	7,303	12,839

Non-Curren	t	Lia	bi	lities
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Superannuation Liability	6,800	6,316
Total Non-Current Liabilities	6,800	6,316
Total Liabilities	14,103	19,154
Net Assets	285,517	158,018
Equity		
Current Year Earnings	127,499	18,030
Retained Earnings	158,018	139,988
Total Equity	285,517	158,018

The Responsible People declare that in the Responsible People's opinion, at the time of the Annual General Meeting on Thursday 27 November 2025:

- A. There are reasonable grounds to believe that Australian Business Software Industry Association Limited is able to pay all of its debts, as and when they become due and payable; and
- B. The organisation is able to meet its Fair Work and Australian Taxation Office obligations as an employer and GST-registered entity.

Signed

Signed by:

Belinda Stewart

Director & Treasurer

Belinda Stewart
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The State of the Business Software Industry

The business software industry operates in an increasingly complex, fast-changing environment. From shifts in government digital priorities to evolving user expectations and emerging technologies, each factor shapes how DSPs innovate, implement and deliver.

At DSPANZ, we monitor these developments through continuous engagement with our members, government partners, industry stakeholders, and international peers. By observing policy changes, market movements, and social and technological trends, we aim to represent the collective voice of DSPs and provide insights that help members navigate the broader digital landscape.

This environmental scan provides an outline of the key forces influencing DSPs in 2024-25 and the broader digital economy across Australia and New Zealand.

Political priorities are driving faster change and creating new demands on the digital ecosystem

The Australian and New Zealand Governments continue to pursue ambitious digital transformation agendas, with an increasing expectation that agencies deliver on policy priorities and objectives faster. This urgency can compress consultation timeframes and create challenges for DSPs as they adapt software to accommodate new or changing requirements.

There remains a limited understanding across different levels of government about DSP software development cycles, release planning, and implementation processes. This disconnect can affect how policies are designed, consulted on, and ultimately operationalised in business software.

Globally, Al regulation continues to emerge unevenly across jurisdictions, leading to potentially fragmented approaches and uncertainty for DSPs delivering products across multiple markets.

Economic conditions remain challenging for DSPs in 2024-25

The number and complexity of legislative and regulatory obligations that businesses must comply with continue to increase, raising both the cost and complexity of software development. At the same time, businesses are navigating their own cost pressures and reassessing their software requirements and technology budgets.

Mergers and acquisitions continue to reshape the software landscape, impacting the market share and size.

Competition for skilled developers remains intense, particularly during significant reform periods when DSPs are simultaneously seeking similar technical talent. Shifting labour costs are narrowing the divide between onshore and offshore, changing how DSPs approach leveraging offshore talent.

Social expectations are evolving rapidly alongside digital adoption

Customers increasingly expect accessible, user-friendly software, with an emerging emphasis on multilingual support and adherence to accessibility standards, such as the Web Content Accessibility Guidelines (WCAG). There is a growing desire for transparency around data handling and privacy, reflecting heightened public awareness of privacy rights.

At the same time, government-led digital transformation is compelling more businesses to adopt compliant software. The adoption of new technologies often hinges on clear mandates or tangible business benefits.

Generational differences in how users interact with software continue to influence product design. While some groups embrace automation and self-service, others still value human engagement and traditional channels. Tax practitioners' roles are also evolving as software capabilities advance.

Technology continues to redefine the DSP landscape

The use of artificial intelligence is expanding, particularly in automating simple or repetitive tasks, yet innovation is advancing faster than government regulation, creating uncertainty around compliance and ethical use.

Modern Application Programming Interfaces (APIs) are lighter and more flexible, enabling greater innovation and reimagined interactions in software.

Security expectations are rising. DSPs must continually update their practices to align with evolving frameworks and address divergent security requirements across jurisdictions. Encouragingly, international standards are becoming more influential, providing a clear benchmark for security and interoperability.

Sustainability and ethical business practices are becoming integral to software operations

Businesses are increasingly required to demonstrate performance on Environmental, Social, and Governance (ESG) criteria, including carbon accounting and responsible supply chain

practices. Attention is also turning to the carbon footprint of digital transformation, with data storage, hosting, and retention practices under scrutiny for their environmental impact.

In Australia and New Zealand, sustainability reporting standards are expanding, and DSPs are expected not only to model these practices internally but also to support their customers' ability to measure and report on sustainability metrics through software functionality.

The legal environment for DSPs continues to evolve amid an expanding digital policy landscape

Questions around data ownership, user consent, and access to information remain central, particularly as businesses and individuals seek greater control over their data. DSPs are increasingly focused on mitigating rising cybersecurity and fraud concerns.

Most legislative requirements reference DSP customers (taxpayers, employers, or individuals) rather than DSPs themselves. This can complicate the interpretation and implementation of obligations.

Frequent legislative change, particularly in tax and employment law, creates an ongoing need for software updates and compliance reviews. Any shift in legal interpretations of business obligations has a direct flow-on effect on DSPs' development roadmaps and release schedules.

Member Engagement

DSPANZ kicked off 2025 by meeting with members in Melbourne and closed the year by hosting a member event in Sydney. These events bookended a year of steady engagement, with members participating in more than 150 hours of working group and committee meetings.

Throughout the year, members attended 5 "Hour of Power" briefings with major Australian banks, 3 security webinars, and consistently joined our regular Payments, Digital Identity, Payroll, and Payday Super meetings. This participation has supported ongoing discussions on key issues and reform areas, and ensured members stayed connected.

Members also continued to rely on our <u>Australian and New Zealand Budget Breakdowns</u> and the measure-tracking spreadsheets that help them follow the progress of new and ongoing measures, and understand their potential impacts.

More recently, we launched a new annual Member Engagement Survey to gather organisational-level feedback from our members on their engagement with us and where we can improve. We will now be seeking input from members at the individual level.

We have also refined parts of the <u>Members Only page on our website</u>, making it easier for members to find key resources, access member benefits and join a committee or working group.

As we move into 2026, our work will continue to focus on improving members' access to information and on strengthening how members connect with us.

DSPANZ currently operates the following committees and working groups to bring members together around topics important to our members and the wider business software industry. Read more about our current committees and working groups, and their key activities in 2024-25, over the following pages.

Australian Payroll Working Group

DSPANZ hosts monthly meetings for our Australian payroll software provider members, facilitated by Director and Vice President Simone Dixon and Director Paul Orford.

The Australian Payroll Working Group continued to provide an active forum for members to collaborate on payroll changes and regulatory reform.

Over the past year, the group focused heavily on the progression of Payday Super and the associated STP changes, ensuring members were well informed and able to influence the changes and supporting documentation. The group also discussed other matters impacting the payroll sector and operational issues, enabling members to collaborate on proposed solutions and advocate for change.

Throughout 2025, members worked together to identify and address areas of uncertainty, such as superannuation definitions, under-18 employee thresholds, and complex pay cycles, while sharing updates through DSPANZ's LinkedIn payroll discussion group to strengthen communication across the industry.

In 2026, the working group will be a key forum for supporting our members in implementing Payday Super.

Digital Identity Working Group

The <u>Digital Identity Working Group</u> met 4 times in 2025 and is co-chaired by DSPANZ Director and President Chris Denney and member Nathan Kerr from One Click Life.

The working group was established in July 2025 in response to the growing challenges of online fraud and data breaches involving personal information. The core aim of the working group is to unite our members and key industry and government participants to explore opportunities for secure identity verification and minimise the collection of identity documents.

Through the following four workstreams, the working group is providing information, education and best practice guidance to members on minimising the collection and storage of identity documents, and promoting the adoption of digital identity:

- 1. Developing best practice for DSPs and businesses.
- 2. Identifying regulatory options to fast-track the use of identity verification solutions by businesses.
- 3. Working through the technology requirements to support DSPs integrating digital identity.
- 4. Creating communication and education materials to support DSPs and how they engage with their customers and end users.

More recently, the working group issued the first draft of the *Privacy and Identity Verification Best Practice Guidance for DSPs*, allowing members to review the guidance and provide feedback. The working has also initiated discussions with the government on regulatory options to support businesses using identity verification solutions, such as creating a "safe harbour", and ensuring they continue to meet their requirements.

In 2026, the working group will turn its focus to finalising the regulatory approach, continuing our engagement on technology requirements and developing further communication resources to support the sector.

The working group has had a productive year and remains committed to advancing secure, efficient, and privacy-conscious identity verification practices for our members and the wider industry.

Payday Super Meeting Group

Since late 2024, DSPANZ has facilitated 7 meetings with interested members to provide updates about the progress of Payday Super. DSPANZ Directors Chris Denney and Paul Orford, along with DSPANZ Public Relations and Policy Manager Maggie Leese, have coordinated these meetings and shared insights from the ongoing ATO consultation working groups.

Throughout 2025, this meeting series facilitated information sharing and provided updates on readiness milestones, including the release of technical documents for the SuperStream changes. Members also had the opportunity to directly provide input into the DSPANZ submission on the draft legislation and explanatory materials. A key focus of the working group across October and November was to keep members informed about the legislative process and eventual passing of legislation.

While this meeting series has primarily supported information sharing over the past year, as we move into 2026, this group will be reimagined to ensure it continues delivering value to members as the focus shifts to implementation across the super ecosystem.

Payments Working Group

The <u>Payments Working Group</u> met 7 times in 2025 and is co-chaired by DSPANZ Director and President Chris Denney and Marnie Ryan, Head of Product Innovation & Enablement at AP+.

The Payments Working Group has had an active and impactful year, focusing on the rollout of the NPP and associated overlay services such as Confirmation of Payee, PayTo and PayID.

The group has worked closely with the banking sector and Payment Service Providers (PSPs) to ensure readiness for these changes.

Key areas of focus included:

- Understanding NPP file formats to facilitate easier reconciliation for DSPs
- Advocating for the NPP to support bulk payment processing
- Examining interactions between the NPP and various SuperStream methods
- Planning for the decommissioning of BECS.

Throughout the year, two major workshops were held with DSPANZ members and AP+:

• March 2025: Developed NPP requirements, standards, payment instructions, data validation, and explored use cases in payroll, superannuation and receivables.

• **August 2025:** Discussed the future of account-to-account payments, focusing on the needs of the payroll sector and future service capabilities.

At the August workshop, PSPs shared insights on how payroll members are beginning to integrate NPP into their products.

Across September, a weekly "Hour of Power" was held with major banks and Cuscal for members to learn about each organisation's NPP roadmaps and overall readiness.

Overall, it has been a busy and productive year for the Payments Working Group as we continue to understand the impact of payment modernisation on our sector and the opportunities that NPP and supporting services present.

DSPANZ would like to give a special thanks to AP+ and Marnie Ryan (Co-Chair) for their ongoing support, willingness to host member workshops, and for creating an environment that encourages co-design and information sharing.

Security Committee

The <u>Security Committee</u> met 6 times in 2025 and is co-chaired by Directors Belinda Stewart and Charles Gillman. The Security Committee's work over the past year has been driven by a focus on providing practical, actionable guidance for members and enhancing industry knowledge-sharing in the evolving security landscape.

2025 has seen the development of a Security Incident Reporting Guide and a series of webinars to support knowledge sharing across our community.

Development of the Security Incident Reporting Guide

The creation of a comprehensive guide to help DSPs manage statutory cybersecurity reporting obligations.

The delivery of the <u>Security Incident Reporting</u>: <u>Comprehensive Guide for Australian Digital Service Providers</u>. This project evolved from an initial "incident response cheat sheet" concept into a detailed, 19-page guide.

The guide provides consolidated advice for DSPs on navigating the complex reporting requirements for multiple agencies, including:

- Office of the Australian Information Commissioner (Notifiable Data Breach Scheme)
- Australian Taxation Office (Digital Service Provider Operational Security Framework)
- Australian Prudential Regulation Authority (Prudential Standard CPS 234)
- Australian Cyber Security Centre (Critical Infrastructure)
- Australian Securities Exchange (for listed entities).

Webinar & Knowledge-Sharing Program



The Security Committee successfully launched a webinar program, with members taking ownership of specific events, including:

- Inside the CHIPs Program: Strengthening Cyber Security with the Australian Signals Directorate: This key webinar discussed the ASD's CHIPs program, which conducts vulnerability scanning of Critical Infrastructure, including many of our members.
- Cyber Unfiltered: Real Incidents, Real Decisions, Real Insights: The webinar featured first-hand insights from Reece Corbett-Wilkins and James Blakely from Atmos, exploring the rising risks of cyber incidents and practical steps members could take to prepare and respond effectively.
- Secure by Design: The first in a two-part series of webinars aimed at non-technical stakeholders addressed the critical gap between functional software and secure software. The session highlighted that as businesses depend on software to handle sensitive customer data, security must be a core component from the beginning, not an afterthought.

Members can catch up on these webinars and access webinar materials on our website.

A pipeline of further webinar topics has been created for 2026, including part two of the Secure by Design series targeting developers. Other potential topics include AI and Security Risk Management, elnvoicing Security, and ATO reporting expectations.

Committee Growth

The Committee successfully expanded its expertise by onboarding several new members to drive its forward plan. We are always looking for new members for the Security Committee. Please contact us if you are interested.

Our Work With Government

DSPANZ works closely with several government departments and agencies across Australia and New Zealand, enabling us to remain informed and advocate for our members.

Through co-chairing the DSP Strategic Working Group, DSP Architecture Reference Group, and New Zealand Digital Advisory Group, DSPANZ has continued to strengthen its relationships with the ATO and the New Zealand IR. We are at the forefront of influencing the ATO and IR's digital transformation journeys and facilitating how each organisation strategically consults with DSPs on the future of tax, payroll, superannuation, invoicing, and social policy systems.

This year, we facilitated a joint session with the ATO's Strategic Working Group and NZ Digital Advisory Group to foster collaboration between these two groups and identify opportunities for alignment, supporting DSPs operating in both jurisdictions.

DSPANZ Directors and members have had the opportunity to meet with the Board of Taxation 3 times over the past year. Conversations with the Board of Taxation have covered supporting small businesses, GST, and reducing tax system red tape.

DSPANZ also co-chairs and represents our members in several government and industry working groups. More information about these can be found on the following pages.

ATO DSP Strategic Working Group

The <u>Strategic Working Group (SWG)</u> is co-chaired by the ATO Deputy Commissioner and Chief Digital Officer, Elissa Walker and DSPANZ Director and Vice President, Matthew Prouse.

This year, the SWG enabled a sharpened focus on future-state tax administration, cybersecurity, data quality, digital identity, and elnvoicing. Across four major SWG meetings and a landmark joint session with the New Zealand Digital Advisory Group, members contributed to shaping the next phase of modernised, API-driven tax system design.

Our April meeting saw the ATO outline priorities emerging from the Australian Public Service Commission (APSC) Capability Review and the refreshed Corporate Plan, including microservices, digital identity, security uplift and the need to collaborate on Tax Administration 3.0 concepts such as data-driven experiences, automation and proactive services. Members identified five high-value themes for joint focus (AI, cybersecurity, data quality, the evolving role of DSPs, and payments modernisation) highlighting the sector's need for clarity, ecosystem-wide alignment, and improved transparency.

In May, DSPANZ led an industry-focused session examining Al governance, alignment with ISO standards (27001, 27017, 27701, 42001), and opportunities to simplify compliance across

the ATO OSF and the Consumer Data Right. Members also explored elnvoicing developments in Australia and New Zealand, emphasising the importance of clear regulatory direction, multi-market interoperability and mid-market adoption.

The October face-to-face meeting brought the broadest engagement of the year. Members received updates on Payday Super, Digital Identity, compromised account management, enhanced prefill for small businesses, and deep engagement with the Tax Practitioners Board on innovation boundaries under the Tax Agent Services Act. The discussion reinforced the critical role DSPs play as intermediaries in a rapidly digitising tax ecosystem.

In November, the first-ever joint workshop between the ATO SWG and New Zealand's Digital Advisory Group reflected the increasingly trans-Tasman nature of the DSP ecosystem. Members explored shared ambitions for Tax Administration 3.0, digital identity alignment, elnvoicing growth, and harmonised security frameworks.

Across 2025, the SWG continued to mature as a trusted forum where the ATO and DSPs collaboratively navigate legislative change, digital transformation, and the long-term shift towards a seamlessly integrated, secure, and data-driven tax system.

ATO DSP Architecture Reference Group

The <u>DSP Architecture Reference Group (DARG)</u> is co-chaired by ATO Director - Digital Wholesale & Integration Services, Michael Ferris and DSPANZ Director, Mike Behling.

The DARG continued to play a vital role throughout 2025 in shaping the long-term architectural direction of ATO-DSP integrations. This year, DARG's focus sharpened around modern API standards, transition planning for legacy platforms, cybersecurity uplift, and preparing digital channels for major reforms such as Payday Super, Organisation for Economic Co-operation and Development (OECD) Pillar Two, and the ATO's "Tax 3.0" vision.

Across the April, July, and November meetings, DARG members worked collaboratively with ATO architects and program leaders to align on future-state integration patterns and ensure the DSP ecosystem remains resilient, secure, and scalable.

The April meeting laid the strategic foundation for the year, highlighting key themes such as REST API standardisation, TLS 1.3 migration, dashboard monitoring improvements, and early planning for the decommissioning of the SBR1. Members also explored the ATO's system readiness for Tax 3.0, opportunities for simplifying onboarding, and the broader move toward cloud-native, pattern-driven architecture.

In July, the group reviewed Tax Time 2025 volumes, discussed API reliability, and engaged deeply on the ATO's roadmap for wholesale services, including new APIs, uplifted event-driven capabilities, and reusability patterns for authentication and identity. Members emphasised the need for consistent API documentation, stronger design principles, and pragmatic guidance on batching and polling. A substantial portion of the session was

dedicated to Rules-as-Code and the Small Business Future Tax Administration initiatives, which continue to evolve the ATO's approach to guidance and prefill services.

The November DARG meeting provided the most comprehensive architectural view to date. Members were briefed on the updated Integration Strategy, the Wholesale Services 2025–26 roadmap, the SBR2 polling guidance, Digital Identity and verified-identity metadata models, OSF uplift proposals, and the cross-agency direction of elnvoicing and digital credentials. The agenda also included updates on TLS 1.3 cutover milestones, emerging architectural dependencies for Payday Super, and the increasing role of DSPs in supporting secure, real-time tax administration.

Throughout 2025, the DARG strengthened its position as a strategic design forum - bridging government, DSPs, and standards bodies to co-design the next generation of digital tax and superannuation infrastructure. The group's insights continue to influence ATO API strategy, security posture, and long-term digital transformation planning ahead of the 2026 reform horizon.

New Zealand Digital Advisory Group

The <u>New Zealand Digital Advisory Group (DAG)</u> is co-chaired by IR's Digital Ecosystems Strategy Lead, Anil Srinivasa and DSPANZ member Tim Kirkpatrick from Tax Traders.

In 2025, the DAG remained a key collaboration forum between IR and DSPs, supporting practical co-design of policy and system changes that affect the New Zealand tax and social policy ecosystem. The group met 4 times, including 2 face-to-face meetings across Auckland and Wellington.

A central theme across 2025 was IR's Improving Business Tax (IBT) programme, focused on simplifying business tax, improving revenue certainty, and reducing compliance costs. The IBT programme includes small business simplification as a priority covering policy settings, digital service models, and the role software can play. DAG members provided input on ensuring initiatives are software-deliverable, aligned to real business workflows, and informed by DSP experience of customer behaviours.

Digital identity was positioned as a critical enabler for future services. With Department of Internal Affairs (DIA) participation, the group examined how decentralised identity and government credentials could streamline verification, onboarding, Anti-Money Laundering (AML) workflows, and business-to-government interactions. IR and DSPs explored opportunities to innovate around verifiable credentials.

The DAG also explored the evolution of Open Banking, Confirmation of Payee, and consumer data frameworks, alongside the long-term potential to embed these frameworks into the tax and social policy ecosystem.

Through workshops and follow-up prioritisation, DSPs and IR built a shared roadmap for Gateway Services enhancements. Priorities included improved validation, better test environments, and increased reuse of IR-held data to reduce information-collection efforts for employers and payroll users. IR sought broader DSP input via DSPANZ to ensure improvement priorities reflected the broader market.

Throughout 2025, the DAG and its working groups cemented their role as the key avenue for IR to consult with and collaborate with DSPs.

DAG Working Groups

The DAG currently supports two working groups: payroll and security.

Payroll Working Group

The <u>DAG Payroll Working Group</u> is co-chaired by IR's Payroll Software Developer Specialist, Angela Pearson and DSPANZ Director Paul Orford.

The working group enables ongoing consultation between Inland Revenue and payroll software providers on upcoming changes, new policies and the future of payroll interactions.

Over 2025, the working group covered the following topics:

- KiwiSaver changes
- Options to improve Employer Superannuation Contribution Tax (ESCT)
- Policy changes
- Proposed Employment Information (EI) validation changes
- Consultation with MBIE on changes to the Holidays Act.

DSP members successfully advocated for proposed changes to capture Employee Share Scheme (ESS) information in the EI to be delivered through a different IR channel. Implementing these changes across all payroll software providers for a limited number of customers that would be impacted would have cost millions in development.

The working group also supports open conversation about the issues payroll software providers face and opportunities to improve processes for software, payroll professionals, employers, and employees.

Security Working Group

The DAG Security Working Group is led by Adwin Singh from IR's Chief Information Security Officer team. The working group's focus since its establishment in 2024 has been to address security matters and develop an Operational Security Framework (OSF) for DSPs.

The group has been fundamental in providing feedback, refining requirements, and advancing the OSF toward launch. The OSF is still in development at the time of writing.

A-NZ Peppol All Stakeholders Working Group

DSPANZ continues to co-chair the <u>A-NZ Peppol All Stakeholders Working Group</u> with the ATO and the Ministry of Business, Innovation and Employment (MBIE), with support from DSPANZ Director Erin Adams and members Matt Lewis (Capability Wise) and Simon Foster (Xero).

This working group brings together government, elnvoicing providers, business software providers and customers to support interoperability across the ecosystem. The A-NZ Peppol All Stakeholders Working Group met twice in 2025, supporting conversations on:

- Creating an A-NZ Peppol Roadmap that outlines key updates, changes and government priorities for elnvoicing across Australia and New Zealand.
- Supporting the publishing of the A-NZ Peppol elnvoicing Guide to assist businesses and government with their technical implementation.
- Updating the Invoice Content Industry Practice Statement.
- Working to resolve an issue with GST rounding, which can arise in elnvoices with hundreds of line items.

GST Stewardship Group

Across 2025, the ATO's <u>GST Stewardship Group</u> provided important insights for developers of accounting, invoicing and tax return software, with three areas most relevant: Al governance, new GST reporting obligations, and future Public Advice and Guidance (PAG) priorities impacting product logic. Director Matthew Prouse currently represents DSPANZ on the GST Stewardship Group.

The March AI session highlighted growing expectations for responsible AI in GST-related software. The ATO and the Commonwealth Safe AI Adoption Model (SAAM) team outlined voluntary AI safety standards, risks in automated decision-making, and case studies of AI in accounting platforms, reinforcing the need for transparency, explainability and safe use of predictive models in GST workflows.

The March and November updates on the Supplementary Annual GST Return gave developers clearer signals on future data and reconciliation requirements. Pilot findings emphasise the importance of structured analytics, particularly the GST Analytical Tool (GAT), which many large and multinational taxpayers use to reconcile accounting and GST figures. This is shaping expectations for audit trails, data quality and enterprise-grade controls in software used for BAS and GST reporting.

GST PAG priorities discussed through 2025 including, Recipient Created Tax Invoices (RCTIs), cross-border suppliers, partnerships, joint ventures and build-to-rent. These priorities signal potential updates to tax engines and GST classification rules. These areas

are likely to influence treatment logic and developer roadmaps as new rules and updates are finalised.

Overall, the 2025 GST Stewardship Group highlighted a shift toward more digitalised, data-driven GST administration, with increasing reliance on software for governance, assurance and accurate GST outcomes.

ASIC Registry Business Advisory Group

In 2025, the <u>Australian Security and Investments Commission (ASIC) Registry Business Advisory Group (RBAG)</u> remained a key channel for industry input into the modernisation of Australia's business registers. Chaired by ASIC and comprising registry users, professional bodies, government agencies and DSPs, RBAG focused on ensuring that registry transformation remains practical, secure and user-centred. Director and President, Chris Denney, represented DSPANZ on the RBAG in 2025.

Across the year, discussions consistently emphasised the importance of clear transition pathways, strong API-enabled foundations, and early engagement with software providers and other intermediaries who support day-to-day registry interactions on behalf of businesses.

Core themes for the RBAG in 2025 included the progressive uplift of digital registry services, improved accessibility and usability for end users, and reducing regulatory friction through streamlined lodgment and identity processes. Members provided feedback on emerging digital architecture (including new search capabilities, APIs and authentication models), as well as on policy and compliance changes that affect registry-dependent sectors. RBAG members also highlighted the need for consistent guidance, realistic implementation timeframes, and cross-agency coordination to manage the cumulative impact of reforms.

Overall, the RBAG's work helped shape a shared understanding between government and industry of what "good" looks like for modern business registers, and reinforced the value of collaboration in delivering trusted, efficient digital services.

Payday Super

To support the introduction and implementation of Payday Super, the ATO has been facilitating several consultation groups that DSPANZ representatives have been participating in, including:

- <u>Payday Super Working Group</u> Maggie Leese, DSPANZ Public Relations & Policy Manager
- SuperStream Data and Payment Standards Technical Working Group Chris Denney, DSPANZ Director & President
- STP Data Improvements Technical Working Group Paul Orford, DSPANZ Director

- Small Business Superannuation Clearing House (SBSCH) Transition Working Group
 - Maggie Leese, DSPANZ Public Relations & Policy.

These working groups are supporting the overall transition process and implementing the technical changes required for SuperStream and STP that will ultimately deliver Payday Super and a smooth experience for employers and employees.

Policy & Advocacy

Throughout 2024-25, DSPANZ played an active role in shaping the digital policy environment across Australia and New Zealand. Our submissions and interactions with the government consistently championed the needs of DSPs and reinforced the indispensable role they play as the bridge between policy ambition and operational delivery.

Across 12 submissions, DSPANZ reinforced our position as the trusted voice for software providers. We offered practical, implementation-focused perspectives to ensure that government reforms are both practical and achievable in software. More information about our policy submissions is available on our website.

DSPANZ has also continued to be involved in ongoing conversations about digital identity, artificial intelligence in software, and the replacement of the Holidays Act in New Zealand with a new Employment Leave Act. Through our efforts, we have enabled initial conversations and consultation with DSPs on potential changes to ensure they can be supported and deliver optimal outcomes.

This year, we established the Policy Discussion Forum as a space for members to drop in, catch up on policy matters, and support our advocacy efforts. We currently host a monthly call and Slack channel with interested members.

Key Policy Themes 2024-25

Implementation realism and industry readiness

DSPANZ strongly advocated for realistic timeframes and structured implementation approaches for significant reforms, such as Payday Super. We emphasised that successful policy delivery depends on early engagement with software providers and sufficient time for development, testing and education.

Security, privacy and data integrity

Across multiple submissions, DSPANZ called for proportionate, risk-based security and data governance measures. We highlighted that strong security frameworks enable, rather than inhibit, digital innovation. DSPANZ advanced the case for secure information-sharing mechanisms between government and DSPs to strengthen fraud prevention and system trust.

Collaboration and co-design with the government

DSPANZ continued to champion co-design as an essential part of policy success. By engaging early and often with DSPs, the government can ensure that new obligations are practical, technically sound and deliverable in software. Our submissions reinforced this message and showcased our members' role as trusted delivery partners for regulatory change.

Data quality and interoperability

Many submissions underline the importance of high-quality, standardised data to drive efficiency and compliance. DSPANZ advocated for investment in data validation services, consistent data standards across agencies, and interoperable digital infrastructure.

Supporting employers and end users

DSPANZ maintained a focus on supporting employers, particularly small and medium businesses, through change. We advocated for education programs, clear guidance and transitional support to ensure smooth adoption of new systems. Our submissions highlighted DSPs' critical role in helping businesses understand and meet new compliance obligations.

Looking Ahead

Looking to 2026, DSPANZ anticipates another intensive year for the business software sector as multiple reforms move from design into delivery. The shift from policy development to implementation will increase the need for coordinated testing, clear technical standards, and consistent customer communication across the ecosystem. DSPANZ will continue to play a central role in aligning government priorities with the practical realities of software development cycles, release planning, and end-user impacts.

A primary focus will be on Payday Super readiness and implementation ahead of the 1 July 2026 start date. DSPANZ will support members in implementing and testing updated SuperStream and STP requirements, and in managing transitional arrangements for employers and payroll customers.

Payments modernisation will also accelerate. DSPANZ will deepen our partnership with AP+ and ensure that NPP capabilities meet payroll and high-volume business payment needs. This includes advocating for bulk payments functionality, fit-for-purpose formats, improved reconciliation, and smooth migration pathways as the BECS decommissioning approaches.

DSPANZ will build on our work on digital identity and privacy-preserving verification. We expect governments in both jurisdictions to progress digital credentials and safer identity-sharing models. DSPANZ will continue supporting member adoption of secure verification approaches that reduce document storage risks, strengthen fraud controls, and promote data minimisation in software.

Security expectations are also expected to mature across Australia and New Zealand, with enhancements to the ATO DSP OSF and the introduction of IR's DSP OSF.

In 2025, DSPANZ commissioned an independent strategic review to ensure we remain well-positioned in a rapidly evolving digital economy. While the review concludes in late 2025, the outcomes and next steps will be shared with members over the coming months. The outcomes of the review will provide the Board with an evidence-based assessment of DSPANZ's current value proposition, capability and operating model, alongside actionable options to strengthen governance, member alignment, and financial sustainability. The review will also consider future strategic pathways for DSPANZ, including growth opportunities and potential partnerships.

Finally, we anticipate expanded cross-agency activity in areas such as the Consumer Data Right, Open Banking, elnvoicing interoperability, and Tax Administration 3.0 concepts, all of which will require strong trans-Tasman coordination and early technical engagement with DSPs. Across these agendas, DSPANZ will remain focused on supporting deliverable policy outcomes, enabling implementation readiness, and sustaining a secure, efficient digital ecosystem for businesses and governments.

For more information about DSPANZ, please visit our website or contact hello@dspanz.org.

Appendix - Acronyms & Glossary

Al	Artificial Intelligence
AML	Anti Money Laundering
API	Application Programming Interface
AP+	Australian Payments Plus. (AP+) brings together Australia's three domestic payment providers, BPAY Group, eftpos and NPP Australia into the one integrated entity.
ASD	Australian Signals Directorate
ASIC	Australian Securities and Investments Commission
APSC	Australian Public Service Commission
АТО	Australian Taxation Office
BECS	Bulk Electronic Clearing System. BECS supports electronic debit and credit payment instructions in Australia.
CHIPs	Cyber Hygiene Improvement Programs. Run by ASD's ACSC to build visibility and develop insights into security vulnerabilities, as well as guide urgent remediation work.
Confirmation of Payee	Banking service that matches the account details you enter with the account details held by the recipient's bank before you send money, and shows you a match outcome.
DAG	Digital Advisory Group
DARG	DSP Architecture Reference Group
DSG	Digital Services Gateway. The ATO's API portal.
DSPs	Digital Service Providers
DSPANZ	Digital Service Providers Australia New Zealand
DPO	Digital Partnership Office within the ATO
EI	Employment Information. Required to be filed by employers each payday.
ESCT	Employer Superannuation Contribution Tax
ESG	Environmental, Social and Governance. A framework used to evaluate a company's impact and performance on sustainability and ethical behaviour.
ESS	Employee Share Scheme

Goods and S	Services Tax
(GAT) payment by	ps the top 100/1000 businesses ensure correct GST analysing variances between accounting and GST g a top-down approach.
IBT Improving B	usiness Tax
IR New Zealan	d Inland Revenue Department
	l Organisation for Standardization. A global body that d publishes international standards.
MBIE Ministry of E	Business, Innovation and Employment
NPP New Payme	nts Platform
OECD Organisation	n for Economic Co-operation and Development
	sharing of banking data, with consumer consent, ted third parties.
	Security Framework. Security frameworks DSPs accessing either the ATO or IR API gateways.
	e and Guidance. The public and private advice and e ATO provides to help with understanding how the
their employ	overnment policy that will require employers to pay rees' superannuation guarantee (SG) at the same salary and wages.
your mobile account, that	n easy-to-remember piece of information, such as number or email address, that's linked to your bank at you can use to receive payments. Businesses can ir ABN or Organisation Identifier as their PayID.
bank accou PayTo agree	ecure payment method that lets you pay from your nt using your PayID, or BSB and account number. Ements are authorised and managed in your online ing you more visibility and control over your money.
PSPs Payment Se	rvice Providers
RCTIs Recipient Co	reated Tax Invoices
	ional State Transfer. REST APIs follow the design the REST architectural style.
SAAM Safe Al Ado	ption Model
SBR Standard Bu	siness Reporting

SBSCH	Small Business Superannuation Clearing House
STP	Single Touch Payroll
SuperStream	A standard requiring all employers to electronically provide payments and related data to super funds.
swg	Strategic Working Group
Tax Administration 3.0	OECD's Tax Administration 3.0 sets out a vision for the digital transformation of tax administration, in which taxation becomes a more seamless, frictionless process over time.
TLS	Transport Layer Security
WCAG	Web Content Accessibility Guidelines