

30 September 2026

Productivity Commission
Locked Bag 2, Collins St East
Melbourne Vic 8003

Via online form.

Re: Business reporting requirements inquiry

To Whom It May Concern:

The Association of Digital Service Providers Australia New Zealand (DSPANZ) welcomes the opportunity to contribute to the Productivity Commission's inquiry into business reporting requirements.

DSPANZ members provide the software and digital services that businesses use to manage their administrative and regulatory obligations across accounting, payroll, employment, tax and superannuation processes. Business software often provides the functionality that helps businesses collect, calculate or report information to the government to meet their tax, payroll and superannuation reporting requirements.

Our members are also required to meet reporting requirements themselves, such as data breach and cyber security incident reporting across various government obligations.

DSPANZ supports the Commission's objective of reducing unnecessary reporting burden.

We support the philosophy of businesses reporting once to government and the reuse of core information across government agencies. We also recognise there is a significant opportunity to simplify how information is reported through establishing common data standards and definitions and better aligning reporting requirements with business processes.

Reporting through business software is an effective and efficient mechanism for government to pursue. However, assumptions are made as to what information is included and available to be reported within software. Prior to any decisions being made on business reporting, there is a need to understand the underlying business process, the information it produces and whether this information is captured within all business software.

Early engagement with Digital Service Providers (DSPs) can help test whether required information exists, whether software is an appropriate delivery mechanism and whether the proposed reform will genuinely reduce the reporting burden for businesses.

Our feedback draws on members' practical experience translating government policy and requirements for tax, payroll and superannuation reporting into software used by Australian businesses.

DSPANZ recommends that any reform resulting from this inquiry:

1. Establish what information businesses actually hold and is available to be reported through business software.
2. Design reporting reform around natural business processes, and understand whether leveraging will genuinely reduce the reporting burden.
3. Harmonise common reporting definitions and data standards, reusing existing standards where appropriate.
4. Engage DSPs and consider implementation requirements early in design and well before solutions are settled.

DSPANZ welcomes the opportunity to work with the Commission as it develops recommendations and to support the subsequent design of reforms that affect business software. Please contact Maggie Leese at maggie@dspanz.org for more information.

Kind regards,

Signed by:

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Chris Denney,
Interim CEO & Executive Director
DSPANZ.

About DSPANZ

Digital Service Providers Australia New Zealand is the gateway for the government into the dynamic, world-class business software sector in Australia and Aotearoa New Zealand. [Our members](#) range from large, well-established companies to new and nimble innovators working at the cutting edge of business software and app development on both sides of the Tasman.



1. Establish what information already exists

Any reforms created as a result of this inquiry should be informed by an understanding of how information is created, held and used across businesses and their software providers.

The government may assume that because software supports a particular business activity, it also holds all of the information relevant to reporting on that activity. In practice, software collects information needed to perform a particular business function and support customer obligations. Other information may sit in another system, be held elsewhere in the business, or not be collected at all.

If a reform requires businesses to start collecting information that was not previously part of a business process, this is not reuse of existing data. It is a new reporting requirement being delivered through an existing reporting channel.

What might seem as a natural fit for delivering reform because it aligns with an existing regulatory reporting process may not be currently possible because businesses do not collect the necessary information in their software in the first place. Where the information may exist, it may not be suitable to support another reporting purpose because it was collected under a different definition or level of detail, or it would require additional information or judgement from the business.

For example, the Commission asks about opportunities to reduce replication between Workplace Gender Equality Agency (WGEA) reporting and Single Touch Payroll (STP). WGEA reporting is commonly derived from HR software and STP derived from Payroll software - they are different products with different customer requirements. Whilst there is likely to be some cross-over in information captured in both systems, STP reporting is uniquely structured to support the operation of the taxation system.

More beneficial would be the creation of a common data set to support WGEA reporting and where certain data is already reported through STP to the ATO, this data is made available for the purposes of supporting WGEA reporting.

WGEA reporting requirements would be simplified and structured to collect unique information that only exists within HR software.

DSPANZ encourages the government to consult with DSPs before making any decisions to reform business reporting requirements to understand whether the supporting information exists and whether it could actually be delivered as a business software experience.

Recommendation 1: Before relying on existing business information or software, the government should establish whether the required information exists, where it is held, whether it is suitable for the proposed reporting purpose and what would be required to use it.

2. Design reporting reform around business activities

Where there are opportunities to deliver reporting reform through business software, the government should design the reporting requirements around the business process or activity. Reporting requirements can be made easier where it aligns with the day-to-day activities that businesses undertake, making compliance a by-product of running a business.

For example, information may naturally arise when a business pays an employee, issues an invoice, makes a payment or updates its business details. If the government requires information that is already generated through these activities, there is an opportunity for reporting to occur as part of the existing workflow rather than requiring a separate reporting process.

Business reporting should not lead to additional red tape. Well designed business reporting can uplift productivity of businesses, freeing up time and resources and enabling the government to collect required information more frequently. It is therefore critical that the government understand the natural business system first before deciding on reporting requirements.

The government should first ask how the relevant business activity occurs, what information it naturally produces and where that information is held. It can then consider whether software is an appropriate delivery mechanism that genuinely simplifies reporting, or whether another approach would be more appropriate.

Recommendation 2: Where reporting reform may involve business software, government should design around the underlying business process and establish whether software will genuinely reduce reporting burden before selecting the delivery model.

3. Harmonise reporting definitions and data standards

DSPANZ agrees with the Commission's assessment that addressing inconsistent definitions, classifications and reporting fields across reporting requirements is an important opportunity for reform.

Currently, if two government agencies both ask a business to report information about its employees but each defines employees differently, the business and its software cannot easily reuse the same information for both reporting requirements.

DSPs themselves are required to meet a number of data breach and cyber incident reporting obligations depending on the government bodies they interact with. When a DSP is responding to an incident they are required to report substantially the same information but in different formats to suit the unique requirements of each government body. These inconsistencies divert resources away from containment and recovery during an active

incident. This illustrates how a reporting burden can arise where substantially the same information must be restructured or reentered to meet different government requirements.

The Data Standards Body (DSB) has been created to provide the government with structure regarding the structure of information for Consumer Data Rights and Digital Identity.

Consideration should be given to expansion of the role of the DSB to implement common definitions, identifiers, data structures and standards across **all** Commonwealth regulatory reporting requirements, particularly by focusing on categories such as tax, financial and employment reporting.

Not only would this approach help reduce the compliance burden for businesses, it would help simplify how DSPs implement different reporting requirements and ultimately improve data quality.

Consistent reporting standards can provide the foundation for a “tell us once” approach, where genuinely equivalent information can be appropriately reused rather than repeatedly reported to different parts of government. The tell us once principle could also work in both directions by making some of the information that the government already holds about businesses available to software allowing it to be checked or pre-filled as part of a reporting workflow.

DSPs will be a key consultation partner as the government looks to harmonise reporting obligations. DSPs can provide the technical expertise needed to test whether proposed definitions and structures correspond with the information generated through real business processes and whether they can be implemented consistently across different products.

Recommendation 3: Government should consider the expansion of the role of the Data Standards Body (DSB) to oversight all Commonwealth business reporting requirements with an objective of harmonising common business reporting definitions and data standards, reusing existing standards where appropriate and involving DSPs in the design of standards that will operate through business software.

4. Consider implementation early in design stage

Early engagement with DSPs on reforms to business reporting requirements that could be delivered through software is essential to help the government understand whether the proposed approach is practical and will genuinely reduce reporting burden.

Where reform can be delivered through software, DSPs will need to implement these changes and support their customers to transition to new reporting processes. The government must consider the time required for implementation and transition and factor this into when reforms could reasonably commence.

Recommendation 4: Government should consider implementation and transition requirements early in design stage and engage DSPs before settling reforms that rely on business software, data standards or digital reporting infrastructure.