



**The Pharmacy
Guild of Australia**



17 October 2018

Mr Matthew Sedgwick
Consumer and Corporations Policy Division
The Treasury
Langton Crescent
PARKES ACT 2600

SUBMISSION: MODERNISING BUSINESS REGISTERS and DIRECTOR IDENTIFICATION NUMBERS LEGISLATION

On behalf of The Pharmacy Guild of Australia (the Guild), I am pleased to provide this submission on Modernising Business Registers and Director Identification Numbers (DIN) legislation.

The Guild represents the owners of community pharmacies which are small businesses and which provide a range of professional health services to the community. These owners of Australia's 5,700 community pharmacies need to strike a balance between running a successful small business and providing primary and preventative health care to their patients.

This submission outlines the Guild's position on this legislation. This long overdue modernisation of the Government business registers for Australian business operations is welcomed by the Guild.

Duplication of any interaction or process is a significant issue for small business, which adds unnecessarily to administrative costs and delay in delivering professional health services to the community.

The consolidation of business registers will simplify business' interactions with Government and reduce duplication, thus ensuring businesses need only 'tell government once' details of their operations.

The Guild welcomes the Australian Government commitment to drive system integration and interoperability between government agencies thereby creating administrative efficiencies for both government and businesses.

Having Australian Government's information technology networks working collaboratively means data will only need to be requested once for a range of activities.

Furthermore, the Australian Government could take this opportunity to create and implement a platform that further enables a whole-of-government system for inter-agency data sharing of non-sensitive business details, including with state/territory jurisdictions into the future.

Many business interactions with Government begin with the Australian Business Register when they apply for an Australian Business Number (ABN), updating business records or undertaking a transfer of business arrangements.

The Guild supports the consolidation of multiple data sources in the one platform which will eliminate duplicated records and create a 'cleaner' data source. Internal dialogue between government agencies

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Ref: [SP1005-1455244801-404](https://www.guild.org.au/SP1005-1455244801-404)

and between levels of government will identify inconsistent or incomplete data on the registry and subsequently help ensure the data is accurate and complete.

Broadly, the Guild supports an open data policy, but recognises that there is data that should be private and should only be released with the business' approval. Therefore, the registry needs to be presented and accessible in a standardised format and be multi-platform readable to improve interaction between all involved parties.

The Guild supports registry fees being used to improve and support the register and the information contained within it.

The Guild welcomes the implementation of Director Identification Numbers (DINs) as contained within the legislation. The DINs will be an invaluable tool in tracking directors and assist regulators in risk profiling companies for compliance activities. Regulators can therefore allocate their resources more efficiently and be better placed to identify behaviour that could negatively affect the economy.

Director responsibilities are quite wide and varied, and it is important people undertaking these roles understand the personal responsibilities attached to these positions. A DIN helps cement the personal allocation of these responsibilities.

On behalf of the Guild, our members and community pharmacies, we appreciate the opportunity to provide feedback related to modernising business numbers and Director Identification Numbers in our industry.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Quilty', written in a cursive style.

David Quilty
Executive Director