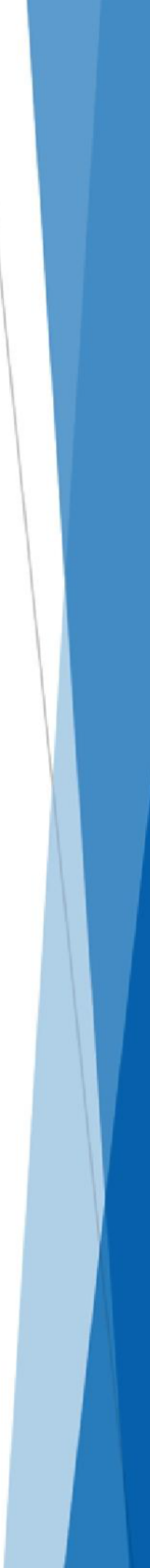




Australian Banking
Association



Statutory Review of the Data
Availability and Transparency Act 2022



Overview

The Australian Banking Association (ABA) appreciates the opportunity to provide feedback on the Statutory Review of the Data Availability and Transparency Act 2022. While the review covers a broad range of important issues, our submission is limited specifically to the value of making personal public sector data more accessible to individuals and small businesses. We believe that enhancing secure access to this data could deliver significant economic benefits through improved productivity and greater innovation.

Personal public sector data

The ABA strongly supports enabling Australians to access and share their personal information held by government agencies. Government entities across federal, state, and local levels hold some of the richest datasets available, including:

- **Taxation and financial records** – Income statements, superannuation data, business activity statements, and payroll data held by the Australian Taxation Office (ATO).
- **Social security and welfare information** – Payment histories, family benefits, childcare subsidies, and concession status held by Services Australia (Centrelink).
- **Health records** – Medicare claims histories, Pharmaceutical Benefits Scheme (PBS) data, immunisation records, and My Health Record information.
- **Licensing and qualification records** – Professional accreditations, trade licenses, and skills certifications maintained by various agencies.

Data sharing frameworks

Australia's Consumer Data Right (CDR), initially introduced for banking and energy sectors, was intended to be economy-wide. Leveraging the existing CDR infrastructure appears logical, as it provides a proven legal and technical foundation for secure, consent-based data sharing, maintaining high standards for privacy and security. Furthermore, the CDR has faced challenges regarding consumer uptake, practical innovation, and impactful use cases. Extending a CDR-like framework to public sector-held personal data could significantly enhance the utility and value of this data, supporting the DAT Act's objectives.

However, provided sufficient security and controls are present, the ABA believes any future data sharing framework should emphasise outcomes over process. Therefore, it is important that alternative pathways – such as standalone APIs already used by agencies like the Australian Digital Health Agency – are also considered. The critical factor is ensuring that any data-sharing mechanism remains secure, consumer-centric, and privacy-preserving, regardless of the specific delivery model.

Anticipated use cases

While many use cases will emerge only after such government data is made available, several high-impact, foreseeable scenarios demonstrate the potential economic and consumer benefits clearly. These have been outlined in the below table, along with comparable or similar precedents from other jurisdictions.



Government data set (data holder)	Indicative and possible use cases – with customer consent	Relevant applications elsewhere
Income tax return and notice of assessment (ATO)	<ul style="list-style-type: none"> Instant and digital income verification for lending applications. Pre-populated affordability checks for rental applications. Automated budgeting and tax-planning apps that surface deduction opportunities or PAYG variations. 	US IRS Income Verification Express Service (IVES) lets borrowers give lenders one-off access to their tax transcripts.
Single Touch Payroll (ATO)	<ul style="list-style-type: none"> Earned-wage-access, wage-advance and micro-credit services that cap advances to real-time accrued wages. Cash-flow dashboards for small businesses that reconcile labour costs daily. Automated superannuation compliance alerts for employers and advisers. 	UK third-party “Employment History Verification” checks pull HMRC PAYE records.
Business Activity Statement / GST lodgements (ATO)	<ul style="list-style-type: none"> Dynamic working-capital or invoice-finance products with credit limits that flex monthly with reported turnover. Supplier-risk tools that flag inconsistent GST remittance before on-boarding vendors. Automated BAS-to-ERP reconciliation for cloud-accounting platforms. 	NZ Inland Revenue Customer API allows authorised advisers and software to pull GST and turnover data directly into accounting stacks.
ABN, ASIC register and Director ID (ASIC)	<ul style="list-style-type: none"> “Click-through” Know-Your-Business (KYB) checks for payment gateways, marketplaces and insurers. Real-time fraud-monitoring (e.g. alerts when an ABN is cancelled or directors change). 	Estonia’s X-Road makes company-registry data available to banks and FinTechs for instant KYB.
Centrelink payment schedule (Services Australia)	<ul style="list-style-type: none"> Utilities, telcos and public-transport operators auto-apply concessions for eligible customers. Lenders incorporate stable benefit income into affordability models, increasing access to finance for low-income households. 	Singapore’s MyInfo lets citizens share verified government benefits and identity data with banks and insurers when applying online.
Medicare and PBS claims history (Services Australia / Department of Health)	<ul style="list-style-type: none"> Tele-health and medication-management apps pre-populate prescription lists to cut consultation time. Travel insurers fast-track pre-existing-condition assessments. 	Health insurers in Singapore pre-fill Integrated Shield Plan applications via MyInfo, removing manual health declarations.



Improved interoperability of electronic health records (Services Australia)	<ul style="list-style-type: none">Instant transfer of clinical information and reducing the need to order duplicate tests.	In a Massachusetts hospital network, introducing shared EHR access lowered the odds of patients having a duplicate CT, MRI, ultrasound or echocardiogram within 48 hours of transfer by ~24 % relative (9.4 % vs 12.4 % before). ¹
Import/Export declarations (ABF Integrated Cargo System)	<ul style="list-style-type: none">Trade-finance providers release funds against real-time proof-of-export, shortening working-capital cycles for SMEs.Global-supply-chain platforms automate ESG and carbon-reporting using shipment data.Insurers offer usage-based marine-cargo cover triggered by declaration events.	Estonian exporters share customs data via X-Road to unlock receivables finance within hours.

Conclusion

In summary, enabling secure, consumer-controlled access to personal public sector data offers substantial economic and social benefits. Whether delivered via the CDR or under an alternative framework, the critical outcome is empowering individuals and small businesses with control over their data, promoting innovation, and driving productivity across the Australian economy.

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About the ABA

The Australian Banking Association advocates for a strong, competitive, and innovative banking industry that delivers excellent and equitable outcomes for customers. We promote and encourage policies that improve banking services for all Australians, through advocacy, research, policy expertise and thought leadership

¹ Rome B, Schnipper J, Mueller S. (2020) *Effect of Shared Electronic Health Records on Duplicate Imaging after Hospital Transfer*. Journal of General Internal Medicine 35(5):1617-1619.