

1 April 2021

Data Economy Unit  
Market Conduct Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

Email: [mbcomms@treasury.gov.au](mailto:mbcomms@treasury.gov.au)

Dear Sir/Madam

**Modernising Business Registers Program on:**

- **Draft Corporations Director Identification Number Data Standard 2021; and**
- **Draft Corporations (Director Identification Number) Disclosure Framework (PGPA Bodies, courts and tribunals) 2021**

*Introduction*

The Small and Medium Enterprise Committee of the Business Law Section of the Law Council of Australia (**SME Committee**) makes this submission to the Modernising Business Registers Program in respect of the following draft data standards issued by Treasury on 12 March 2021:

- Draft Corporations Director Identification Number Data Standard 2021; and
  - Draft Corporations (Director Identification Number) Disclosure Framework (PGPA Bodies, courts and tribunals) 2021
- (together the **Draft Data Standards**)

The SME Committee has as its primary focus the consideration of legal and commercial issues affecting small businesses and medium enterprises (**SMEs**) in the development of national legal policy in that domain. Its membership is comprised of legal practitioners who are extensively involved in legal issues affecting SMEs.

Please note that the SME Committee's submission may differ from those made by other Committees of the Law Council because of our Committee members' perspectives and experiences as advisers to SMEs.

*Submission*

The SME Committee has been fortunate to have been represented on the Business Advisory Group for the Modernising Business Registers Program throughout the development of the Director Identification Number framework and has already provided input to each of the Draft Data Standards and recognises that its input has been taken up in the Draft Data Standards.

Accordingly, the SME Committee supports the Draft Data Standards as they are currently proposed without requirement for any change.

*Further discussion*

The SME Committee would be happy to discuss any aspect of this feedback.

Please contact Coralie Kenny, Chair of the SME Committee, on 0409 919 082 if you would like to do so.

Yours faithfully

A handwritten signature in black ink, appearing to read "Greg Rodgers". The signature is written in a cursive style with a large, looped initial "G".

**Greg Rodgers**  
**Chair, Business Law Section**