



PROGRAM PROTOCOL

**Data Matching between Department of Human Services
and the Australian Taxation Office**

‘Non-Employment Income Data Matching - NEIDM’

August 2016



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1. Description of the Program Protocol

1.1 PURPOSE

The purpose of the program protocol is to:

- (i) identify the matching agency and the source agency;
- (ii) detail the direct relationship of the program to the performance of the lawful functions or activities of the matching agency;
- (iii) set out the legal basis for any collection, use or disclosure of personal information involved in the program;
- (iv) outline the objectives of the program, the procedures to be employed, the nature and frequency of the matching covered by the program and the justifications for it;
- (v) explain what methods other than data matching were available and why they were rejected;
- (vi) detail any cost/benefit analysis or other measures of effectiveness, which were taken into account in deciding to initiate the program;
- (vii) outline the technical controls proposed to ensure data quality, integrity and security in the conduct of the program;
- (viii) provide details of pilot/prior data matching program;
- (ix) outline the nature of the action proposed to be taken in relation to the results of the program including any letters to be used by the agency involved;
- (x) indicate what form of notice is to be given, or is intended to be given to individuals whose privacy is affected by the program; and
- (xi) specify any time limits on the conduct of the program.

1.2 REQUIREMENT FOR A PROGRAM PROTOCOL

The Information Commissioner's *Guidelines on Data Matching in Australian Government Administration* specify that a program protocol be prepared by agencies conducting certain data matching programs. These guidelines are voluntary. The Department of Human Services (DHS) complies with these guidelines.

1.3 DEFINITION OF DATA MATCHING

Data matching is the comparison of two or more sets of data to identify similarities or discrepancies. In the context of this protocol, the term data matching is used to denote the use of computer techniques to compare data found in two or more computer files to identify cases where there is a risk of incorrect payment.

DHS observes the *Australian Privacy Principles*. Individuals who consider that an agency has interfered with their privacy may complain to the Office of the Australian Information Commissioner.



2. Description of the Data Matching Program

2.1 SUMMARY OF THE PROGRAM

DHS delivers a range of programs for payments and services on behalf of the Commonwealth. These payments and services are delivered in accordance with Business Partnership Agreements with client departments.

To maintain the integrity of these payments and services, DHS undertakes compliance activities to ensure ongoing entitlement and eligibility.

In the 2015-16 Mid-Year Economic and Fiscal Outlook (MYEFO), the Australian Government announced the Non-Employment Income Data Matching (NEIDM) program.

The purpose of the NEIDM program is to identify non-compliant individuals requiring administrative or investigative action. This is identified through the comparison of information held by the Australian Taxation Office (ATO) and what customers have reported to both agencies. The comparison is to identify where DHS customers may have income recorded with the ATO that exceeds the income they have reported to DHS.

The program is a phased project addressing non-declared and under-declared income while delivering an enhanced online compliance intervention capability. The first phase of the project involves approximately 20,000 compliance interventions that will rely on DHS's current manual letter process. Later phases of the project will involve the online interaction with customers. This allows DHS to provide more detail to its customers and empower them to respond in an informed manner. It also allows DHS to address non-compliance in a more efficient manner in instances where customers choose not to participate.

This program protocol covers the first phase of the program and will be updated prior to the commencement of the later phases to address elements of the subsequent phases such as the online compliance capability.

2.2 OBJECTIVES

The objectives of this matching program are to:

- Ensure that Centrelink payments are only made to those individuals who are entitled to receive them.
- Detect and address non-compliance.
- Provide net savings by detecting overpayments and recovering debt.
- Develop an efficient online mechanism for customers to respond to suspected non-compliance.



3. Agencies Involved

3.1 SOURCE AGENCIES

The source agencies that supply data for the purposes of this program are:

- DHS
- ATO

3.2 MATCHING AGENCY

The key matching agency involved in this program is the ATO
DHS provide customer files to the ATO for identity matching.

3.3 PRIMARY USER AGENCY

DHS is the agency that makes most substantial use of the programs results. It receives the matched data from the ATO to identify non-compliance.

4. Data Issues

4.1 DATA QUALITY

Poor quality data is of limited value in data matching. DHS will verify the integrity of the data received for such things as correct format and that data is present in all the mandatory fields.

Data quality mechanisms will include:

- the ATO only return high confidence match results to DHS.
- DHS will seek validation from the customer of any ATO income reported that may be of relevance to welfare eligibility.
- where customers provide updated or corrected information, DHS takes this into account when determining the type and need of administrative action.

DHS's experience matching the same data with the same matching criteria shows an extremely low number of instances of incorrect matching. Despite this, DHS has a well-established process to deal with these instances and reduce or eliminate potential privacy impacts.

To Support the NEIDM program DHS has formal programme and project governance arrangements in place. This governance provides a formal reporting mechanism of all data matching and issues including those related to privacy.

These governance arrangements consist of formal Compliance Programme and Performance committees that oversee the department's risk based Compliance Programme. The committees consisting representatives responsible for aspect data matching and the department's actions resulting from the matching activity. Key decisions and issues and performance reporting are controlled via these committees and formally endorsed by departmental executives.



Branches involved with data matching have a formal relationship with the DHS's Privacy and Information Release Branch to report and resolve privacy matters and data matching incidents. The branch works in partnership with the Privacy and Information Release Branch to collect and assess information on privacy issues relating to data matching.

4.2 DATA INTEGRITY

DHS maintains a high level of data integrity. Measures taken to maintain integrity levels include designing systems that will not accept records that are incomplete, and identifying and correcting records that have data items that are inadequate or corrupt.

4.3 DATA SECURITY

The ATO and DHS exchange data using the dedicated mainframe to mainframe Optus Evolve link. This mechanism provides secure and trusted communications across government jurisdictions.

The ATO data received by DHS is held in DHS's secure Teradata and SAP HANA environments. These are core systems that employ strict security controls. Only DHS employees with a business need have access to view the ATO data provided under this program.

DHS's staff are subject to existing security controls and the confidentiality provisions of the *Social Security (Administration) Act 1999*. Access to DHS's computer centres is strictly controlled and entry properly authorised. DHS's security system provides protection and control of dataset access and system entry and program integrity. Security features include logon identification codes, passwords and security groupings to ensure that access to information is on a needs-only basis.

The ATO is responsible for its own security with respect to its staff and access to the data provided by DHS. The ATO are subject to existing security controls and subject to the Privacy Act 1988, the Crimes Act 1914 and the Public Service Act 1999. Access to the ATO's computer systems is limited and is subject to requests for system access which include reminders about privacy and security obligations. Security features include logon identification codes and passwords. All access to the system is monitored and logged. Existing security arrangements in the department automatically log user access to data files.



5. The Matching Process

The identity data matching of the two information sources is conducted by the ATO. The output of this matching is provided to DHS as 'matched' records.

DHS uses these matched records to identify customers, who may have income that has not been correctly declared to DHS.

The matching process will use various elements and/or combinations of the following fields:

- Gender
- Surname
- First Name
- Other Given Name
- Year of Birth
- Month of Birth
- Day of Birth
- Address Line 1
- Address Line 2
- Locality
- Post Code
- State Code

To uphold an individual's right to privacy, the resulting matches are only those where the ATO records have the same identity details as DHS's customers. In addition to this, DHS only exchanges information for customers who:

- have received a payment within the relevant financial year.
- are partnered to a customer who has received a payment within the relevant financial year.
- have an outstanding debt.

The ATO then provide Income Tax Return and Pay As You Go information only for these specific matched records.

A technical standards report can be found at Appendix A

6. Action Resulting from the Program

Following the provision of matched records from the ATO to DHS, DHS will apply compliance risk rules. If a matched customer meets key risk criteria, the relevant information will be referred to the customer for response.

When a customer disagrees with the information presented they are provided an opportunity to adjust the information and provide supporting evidence. DHS takes this information into account when determining administrative action.



When a customer doesn't provide a response within the specified time, DHS makes the determination of appropriate administrative action based on the information provided by the ATO.

7. Time Limits Applying to the Program

The first matching exercise is intended to be conducted in August 2016 and thereafter occur on a bi-annual basis.

DHS does not intend to create a permanent register or database on matched or non-matched selections as part of this protocol.

8. Public Notice of the Program

There has been several public references and announcements for the NEIDM program which includes stating it involves 'income data matching'.

While DHS has no objections to publicising high level details of this program and submitting an appropriate gazettal notice. Advertising the specific details of the program, such as matching criteria and risk profiles, would inform individuals of possible avoidance techniques they would need to employ to evade detection and may make detection more difficult.

A copy of the Public Notice can be found at Appendix B.

9. Reasons for Conducting the Program

9.1 RELATIONSHIP WITH THE AGENCIES LAWFUL FUNCTIONS

The program is related to the DHS's lawful function of limiting payments to those eligible under relevant legislation. The *Social Security Act 1991* and the *Social Security (Administration) Act 1999* provide that customers are required to be eligible for payment. These requirements are given to customers in a written advice authorised under different sections of these Acts for different payment types.

9.2 SOCIAL CONSIDERATIONS

Welfare is often topical and of interest to the media and the general public. There are some key social issues associated with the measure:

- that only persons entitled to receive payments from DHS do so and they receive correct entitlements
- An individual's right to privacy is protected.

Aligned to those issues is a concern for social justice. In particular, there is strong support in the community for an income support system that directs available funds and services to those most in need of assistance. The program helps to achieve this in two ways:



- By strengthening controls in the DHS 's payment systems, it reduces the outlays from DHS's programs (this provides funds for the Government to direct to other priorities); and
- The existence of effective controls in payment systems soon becomes evident to the community and rapidly increases voluntary compliance.

Suitable safeguards against unreasonable intrusion into the privacy of individuals are built into the data matching arrangements. Matching is conducted in accordance with the Privacy Commissioner's Guidelines on Data Matching in Australian Government Administration.

When comparing the NEIDM program to DHS's existing data matching activity, the NEIDM program reduces the amount of information disclosures and burden places on customer and third parties.

10. Legal Authority

10.1 DHS

Section 192 of the *Social Security (Administration) Act 1999* provides that DHS may require the provision of information of relevance to the assessment of claims for DHS's payments, including whether a payment is or was payable to the person who received it or whether the rate is or was correct.

Section 195 of the *Social Security (Administration) Act 1999* provides that DHS may require the provision of specified information that relates to a class of people. This section authorises DHS to request data about customers.

Australian Privacy Principle 6 (APP 6) does not limit the disclosure of personal information by an agency where that disclosure is required or authorised by or under law. As the ATO information involved in this data matching program is obtained by DHS under *Schedule 1 Item, 1 of Table 1 of the Taxation Administration Act 1953*, APP 6 does not limit its disclosure to DHS.

10.2 ATO

The ATO legislation allows the ATO to disclose ATO information to an Agency Head (within the meaning of the Public Service Act 1999) of an agency (within the meaning of that Act) dealing with matters relating to the social security law (within the meaning of subsection 23(17) of the Social Security Act 1991) where is for the purpose of administering that law (the Social Security Act 1991).

11. Disclosure of Information Provisions

11.1 DHS AND ATO

DHS view the NEIDM program as a positive step in continuing to increase its transparency in its data matching activity.



Under this program DHS will provide the actual data received from the ATO to the customer. At the same time, the program reduces the amount of information disclosures with third parties such as employers.

There is also reduced information disclosure of customer have to again provide income related information to DHS that has already been provided to the ATO.

ATO only releases sufficient information to DHS to allow it to determine whether a customer is eligible for payment and whether administrative action needs to be considered.

12. Alternative Methods

Currently, DHS undertakes similar matching to this program under the *Data-matching Program (Assistance and Tax) Act 1990*. (DMP). While the DMP addresses similar compliance risks, restriction of the Act has meant overtime, that DHS haven't been able to introduce efficiencies developed in other matching programs. This has led to DHS's activity under the DMP to become inefficient for customers and third parties as well as DHS itself when compared to the other compliance activity.

The NEIDM program not only opens the door for DHS to recognise efficiencies, it will form part of DHS's innovative compliance platform for the future. DHS's will be able to address significantly more non-compliance and do so by empowering customers with more information.

It is not possible to conduct this type of compliance activity without the exchange and matching of data. The NEIDM program represent the most efficient and effective alternative to address compliance related to un/under-declared income.

13. Pilot/Prior Data Match Programs

DHS and the ATO have been working in partnership to conduct data matching for more than two decades.

The ATO and DHS participate in data matching activity under the *Data-matching Program (Assistance and Tax) Act 1990*. There are several other data matching programs that the two agencies conduct which include the same data in this program.

The NEIDM program uses the same data and matching routines as several previous programs with the significant difference being the combination of two ATO sources (ITR and PAYG) into one program.

This allows DHS to provide more detail to its customers and empower them to respond in an informed manner. It also allows DHS to address non-compliance in a more efficient manner in instances where customers choose not to participate.



14. Costs and Benefits

As announced in the MYEFO, the NEIDM program is expected to return over \$300M in savings for the first year from approximately 80,000 interventions. The 20,000 manual interventions covered by this program protocol represent a significant proportion of the first year's activity.

In addition to the quantitative benefits, the NEIDM program will allow DHS to address significantly more non-compliance with customers. Overtime this will lead to more preventative approaches and increase voluntary compliance and reduce debt.

Appendix A - Technical standards report

A. Descriptions of Data

The following data items to be provided to the ATO by DHS for identity matching purposes:

- Centrelink Reference Number
- Gender
- Name
- Date of Birth
- Address

Table 1 – Centrelink Identity File

Data item	Description
REF-NUMBER	Centrelink Reference Number
GENDER	Gender
SRNM	Surname
1ST-NM	First Name
OTHR-GVN-NM	Other Given Name
BRTH-YR	Year of Birth
BRTH-MTH	Month of Birth
BRTH-DAY	Day of Birth
ADDR-LN-1	Address Line 1
ADDR-LN-2	Address Line 2
LCLTY-NM	Locality
POST-CD	Post Code
STATE-CD	State Code

The following data items to be provided to DHS by the ATO for a 5-year period (2011 – 2015 inclusive)



- Returned Identity File
- Income Tax Return
- 'Pay As You Go' Payment Summary – Payer Record
- 'Pay As You Go' Payment Summary – Payee Record

Table 2 - Returned Identity File

Data item	Description
CENTRELINK-ID	Centrelink Reference Number
CLINK-ID-CHECK-SUM	Check digit value for agency customer reference number (CRN)
CENTRELINK-CD	DHS relationship C = Client S = Spouse 1 & 2 = Parent
SRNM	Surname
1ST-NM	First Name
2ND-INIT	Second Initial
BIRTH-DAY-NUM	Birth - Day
BIRTH-MTH-NUM	Birth - Month
BIRTH-YR	Birth - Year
SEX-CD	Sex – M/F
ADDLN-1	Address Line 1
ADDLN-2	Address Line 2
ADDLN-3	Address Line 3
LCLTY-NM	Suburb/Town/City
PC	Post Code
CNTRY-NM	Country
ADDLN-1	Address Line 1
ADDLN-2	Address Line 2
LCLTY-NM	Suburb/Town/City
PC	Postcode
CNTRY-NM	Country
SPSE-1ST-INIT	Spouse first name
SPSE-2ND-INIT	Spouse second name
COMSPRSD-CD	"C" if IRL_STS_CD = 'COM' else "N"



Table 3 - Income Tax Return Table

Field name	Description
CRN	DHS customer reference number (to be derived from the CRN/TFN Link file)
YEAR	
Filler	space
ASMT-ISS-DT	Effective date of the NOA request transaction (DT_IN of TF2FDETAI, if NoA is to be issued)
SALARY	Total of Income for Salary and wages
ALLOWANCE	Allowances, earning, tips, directors fees, etc
LSP-FULL	Lump Sum Payment A - Full
LSP-5-PC	Lump Sum Payment B - 5%
ETP-TAX-COMP	ETP - Taxable component
USB	Commonwealth of Australia Government Allowances and payments
AGE-PENS	Commonwealth of Australia Government Pension and allowances
AUS-ANN-SUP-TXED	Australian annuities and superannuation income – taxable component – taxed element
AUS-ANN-SUP-UNTXED	Australian annuities and superannuation income – taxable component – untaxed element
AUS-ANN-SUP-LS-TXED	Australian annuities and superannuation income – -lump sum in arrears - taxable component – taxed element
AUS-ANN-SUP-LS-UNTXED	Australian annuities and superannuation income – -lump sum in arrears - taxable component – untaxed element
AUS-SUP-LS-PAY-TXED	Australian superannuation lump sum payments – taxed element
AUS-SUP-LS-PAY-UNTXED	Australian superannuation lump sum payments – untaxed element
ATTRIB-PSI	Attributed personal services income
TOTAL-RFB	Total reportable fringe benefits amounts
INTEREST	Gross Interest
UNFRANKED-DIVD	Unfranked Dividends
FRANKED-DIVD	Franked Dividends
IMP-CRDT	Dividend Imputation Credit
PP-DSTBN-PRTNRSH	PP - Income or loss distribution from Partnership
PP-DSTBN-TRUST	PP - Income distribution from Trust
N-PP-DSTBN-PRTNRSH	NPP - Income distribution from Partnership
N-PP-DSTBN-TRUST	NPP - Income distribution from Trust
PSI-VOL-AGREE	Personal Services Income - voluntary agreement
PSI-NO-ABN	Personal Services Income - where ABN not quoted
PSI-LAB-HIRE-PAY	Personal Services Income - labour hire or other specified payments
PSI-OTHER	Personal Services Income - other
NET-PSI	Net personal services income
PRIM-PROD	Net Business Income PP
OTHR-BUS	Net Business Income NPP
EQUAL-WITH	Net Income Equalisation Deposits (IED) and/or farm management (FMD) deposits and withdrawal
NET-CAPT-GAIN	Net Capital Gain
CFC-INCOME	Controlled Foreign Company income



Field name	Description
TRAN-TRST-INCOME	Transferor Trust income
FIF-FLP-INCOME	Foreign Investment Fund (FIF) or Foreign Life Assurance Policy (FLP) income (The requirement to report these values on the 2011 Individual Tax return has been repealed so all values will be zero)
NET-FOR-EMP-A-NO-UPP	Net foreign employment and foreign pension or annuity income without an un-deducted purchase price
NET-FOR-PEN-A-WITH-UPP	Net foreign pension or annuity income with an un-deducted purchase price
OS-OTH-INCOME	Other general net foreign source income
FRGN-E-SLY-WG	Exempt foreign employment income
GROSS-RENT	Gross rent
NET-RENT	Net Rent
LIFE-BONUS	Life assurance bonuses
FOR-MAN-INV-INC	Forestry managed investment scheme income
OTHR-INC-CATEGORY-1	Other income - Category 1 (Reimbursements of tax-related expenses or election expenses; allowances or payments to members of local councils; Lump Sum Payment in arrears, including LSPAs of Commonwealth of Australia government pensions)
OTHR-INC-CATEGORY-2	Other income - Category 2 (Any income not described in category 1; LSPAs of Other Australia pensions and annuities; LSPAs of foreign pensions and annuities which have, or have had, an un-deducted purchase price)
TOT-INCOME	Total Income or Loss
TXBL-INCOME	Taxable Income
SPOUSE-REBATE	Spouse (married or de facto), child-h/keeper or housekeeper
SPSE-SRNM	Spouses family name
SPSE-1ST_NM	Spouses given names: First name
SPSE-OTHR_GVN_NM	Spouses given names: Other given names
AUS-FRK-CR-FR-NZ-COY	Foreign Income-Australian Franking Credits from NZ company
LOSS-PP-CY	primary production losses claimed this FY
LOSS-NPP-CY	Non-primary production losses claimed this FY



Table 4 - Payment Summary Output File Table – Payer Table

Field name	Description
Record length	Indicates the length of the record.
Record Type	Indicates this record is a Payer record.
Payer Australian Business Number or Withholding Payer Number	The ABN is an 11 digit number. The WPN is a 9 digit number
Payer Branch Number	Payer Branch Number
Financial year (CCYY)	Financial year (CCYY)
Payer name	Payer name
Payer trading name	Payer trading name
Payer address - line 1	Payer address - line 1
Payer address - line 2	Payer address - line 2
Suburb, town or city	Suburb, town or city
State or territory	State or territory
Postcode	Postcode
Country	Country
Contact name	Contact name
Contact telephone number	Contact telephone number
Contact facsimile number	Contact facsimile number
ETP payer type	Superannuation payer or Other ETP Payer
ANZSIC Code	ANZSIC Code



Table 5 - Payment Summary Output File Table – Payee Table

Field name	Description
Record length	Indicates the length of the record.
Record Type	Indicates this record is a Payee record
Payment Summary Record Type	Type of Payment Summary
Client reference number	Client reference number
Payee Australian Business Number	If blank or 0 then R02_PYE_M_TFN_ABN
Payee date of birth (DDMMCCYY)	Format to DDMMCCYY
Payee surname	Payee surname
Payee first given name	Payee first given name
Payee second given name	Payee second given name
Payee address - line 1	Payee address - line 1
Payee address - line 2	Payee address - line 2
Payee suburb, town or city	Payee suburb, town or city
Payee state or territory	Payee state or territory
Payee postcode	Payee postcode
Payee country	Payee country
Period of payment start date (DDMMCCYY)	Format as DDMMCCYY
Period of payment end date (DDMMCCYY)	Format as DDMMCCYY
LAB Payment type	This attribute is only used for the LAB record.
Withholding rate	The rate at which tax was withheld. The withholding rate is stored as five characters to two decimal points, e.g. 04850 = 48.5%
Total tax withheld (dollars)	Total tax withheld (dollars)
Gross payments (dollars)	Gross payments (dollars)
Total allowances (dollars)	This attribute is only used for the INB record.
Lump sum payment A (dollars)	This attribute is only used for the INB record or FEI record
Lump sum payment B (dollars)	This attribute is only used for the INB record.
Lump sum payment D (dollars)	This attribute is only used for the INB record or FEI record
Lump sum payment E (dollars)	This attribute is only used for the INB record or FEI record
Community Development Employment Project (dollars)	This attribute is only used for the INB record.
Other income (dollars)	This attribute is only used for the INB or DSP records.
Reportable fringe benefits (dollars)	This attribute is only used for the INB record or FEI record
Income type	This attribute is only used for the INB record. Values are: S = salary & wages P = Pension
Number of calendar days in eligible service period before 1 July 1983	This attribute is only used for the ETP or ETS records.
Number of calendar days in eligible service period after 30 June 1983	This attribute is only used for the ETP or ETS records.
CGT exempt component (dollars)	This attribute is only used for the ETP or ETS records.



Field name	Description
Non-qualifying component (dollars)	This attribute is only used for the ETP or ETS records.
Undeducted contributions (dollars)	This attribute is only used for the ETP, ETS or DSP records.
Concessional component (dollars)	This attribute is only used for the ETP or ETS records.
Pre July 1983 component (dollars)	This attribute is only used for the ETP or ETS records.
Post June 1983 untaxed element (dollars)	This attribute is only used for the ETP, ETS or DSP records.
Post June 1983 taxed element (dollars)	This attribute is only used for the ETP or ETS records.
Post June 1994 invalidity component (dollars)	This attribute is only used for the ETP or ETS records.
Assessable amount (dollars)	This attribute is only used for the ETP or ETS records.
Taxed component taxable amount	The reported amount of taxable superannuation that has been taxed
Total taxable amount	The reported amount of total taxable superannuation
Untaxable component taxable lump sum amount	The reported amount of a lump sum in arrears that is taxable and has not been taxed
Taxable component taxable lump sum amount	The reported amount of lump sum in arrears that is taxable and has been taxed
Tax offset amount	The reported amount of superannuation tax that has been offset
Transitional termination payment code	Reported value indicating whether the amount on a 'DEMP' report is a transitional termination payment
Related prior payment code	Reported value indicating whether the amount on a 'DEMP' report is related to a prior termination payment
Amendment resolution code	The derived resolution of an attempted amendment
Amendment code	Amendment code as reported
Death benefit (=Y or N)	This attribute is only used for the ETP, EMP or SLS records.
Type of death benefit (=T or O)	This attribute is only used for the ETP, EMP or SLS records.
Payer Australian Business Number or Withholding Payer Number	The ABN is an 11 digit number. The WPN is a 9 digit number
Payer Branch Number	Payer Branch Number
Payee sex	Sex code of the client
Compromised TFN	The status of the matched TFN if compromised, else blank
TFN quoted ind	TFN quoted ind
Payee match resolution code	Match resolution code
Filler	



B. Matching Techniques

Identify Matching

The identity data matching of the two information sources is conducted by the ATO. The output of this matching is provided to DHS as the 'matched' records.

DHS target customers where there is a discrepancy between income declared to the ATO and income declared to DHS.

This could be -

- A) Customer and Spouse
- B) Spouse but not customer
- C) Customer but not spouse

How DHS detect the discrepancy depends on the information gathered. DHS may have to use different business rules to obtain an accurate and valid result.

Income Matching

Information is extracted from the DHS Enterprise Data Warehouse for both current and the target financial years

- declared earnings
- compensation payments
- other government payments
- business, real estate or other income and / or payments
- partner relationship history
- student course history
- Centrelink payment and debt history
- demographic data as required

Algorithms are applied to this data to calculate totals for each financial year required.

Where a Customer or Spouse is identified as having a discrepancy, the selected case will then be loaded into our core systems for compliance action.

C. Risks

Incorrect identity matches

The ATO uses sophisticated identity matching techniques to ensure they identify the correct taxpayer from data provide by DHS. This technique uses multiple details to obtain an identity match. For example, where a Customer Reference Number (CRN), name, address and date of birth are available all items are used in the identity matching process.



Very high confidence matches will occur where all fields are matched to a taxpayer in ATO systems. Additional manual processes may be undertaken where high confidence identity matches do not occur.

D. Data quality controls and audit

When compliance action is proposed, additional checks will take place to ensure the correct DHS customer or spouse has been identified. DHS Customers will be provided with the opportunity to verify the accuracy of the information before any compliance action is taken.

E. Security and confidentiality

All DHS computer systems are strictly controlled with features including:

- system access controls and security groupings
- login identification codes and password protection
- full audit trails of data files and system accesses



Program Protocol

Data-matching between Department of Human Services and the Department of Education and Training

Family Day Care (FDC)

July 2017

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1. Description of the Program Protocol

1.1 Purpose

The purpose of the program protocol is to:

- identify the matching agency and the source agency
- detail the direct relationship of the program to the performance of the lawful functions or activities of the matching agency
- set out the legal basis for any collection, use or disclosure of personal information involved in the program
- outline the objectives of the program, the procedures to be employed, the nature and frequency of the matching covered by the program and the justifications for it
- explain what methods, other than data-matching, were available and why they were rejected
- detail any cost/benefit analysis or other measures of effectiveness, which were taken into account in deciding to initiate the program
- outline the technical controls proposed to ensure data quality, integrity and security in the conduct of the program
- outline the nature of the action proposed to be taken in relation to the results of the program, including any letters to be used by the agency involved
- indicate what form of notice is to be given, or is intended to be given to individuals whose privacy is affected by the program, and
- specify any time limits on the conduct of the program.

1.2 Requirement for a Program Protocol

The Information Commissioner's *Guidelines on Data-matching in Australian Government Administration* specify that a program protocol be prepared by agencies conducting certain data-matching programs. These guidelines are voluntary, but represent the Information Commissioner's view of best practice. The Department of Human Services (DHS) complies with these guidelines.

1.3 Definition of Data-Matching

Data-matching is the comparison of two or more sets of data to identify similarities or discrepancies. In the context of this protocol, the term data-matching is used to denote the use of computer techniques to compare data found in two or more computer files to identify cases where there is a risk of incorrect payment.

DHS observes the *Australian Privacy Principles* (APP) as provided in Schedule 1 of the *Privacy Act 1988* (Privacy Act). Individuals who consider that an agency has interfered with their privacy may complain to the Office of the Australian Information Commissioner.

2. Description of the Program

2.1 Summary of the Program

DHS delivers a range of programs for payments and services on behalf of the Commonwealth. These payments and services are delivered in accordance with Business Partnership Agreements with client departments.

To maintain the integrity of these payments and services, DHS undertakes compliance activities to ensure ongoing entitlement and eligibility.

As part of an ongoing focus on the detection of recipients failing to declare income, an initiative was introduced from December 2014 to match DHS payment recipients with Department of Education and Training (DET) Family Day Care (FDC) educators and operators.

Data from DET is used to initiate FDC interventions that target customers who are not declaring or are under-declaring income from self-employment as a family day care educator and operators. This income is considered and reviewed as business income. Matching compares the income from family day care against earnings or business income declared to the department.

This program assists DHS to assess an income support recipient's ongoing eligibility for a benefit by identifying those recipients who may not have correctly disclosed income and/or assets.

The first program protocol for this matching was lodged with the Office of the Australian Information Commissioner along with a public notice published in the Commonwealth Gazette in December 2014. This program protocol has been updated to reflect the current activity.

2.2 Objectives

The objectives of this matching program are to:

- ensure that income support payments are only made to those individuals who are entitled to receive them
- detect and address non-compliance
- provide net savings by detecting overpayments and recovering debt.

3. Agencies Involved

3.1 Source Agency

The source agencies that supply data for the purposes of this program are:

- DET
- DHS

3.2 Matching Agency

The key matching agency involved in this program is DHS.

3.3 Primary User Agency

DHS is the agency that makes the most substantial use of the program's results. It receives the data from DET to identify potential non-compliance.

4. Data Issues

4.1 Data Quality

Poor quality data is of limited value in data-matching. DHS verifies the integrity of the data received from DET for such things as correct format and ensures data is present in all mandatory fields.

Data quality mechanisms include:

- An identity validation process. If there is any discrepancy in data the selection will be parked and will be individually examined against all related identity data holdings, including Historical Family, Australian Electoral Commission, Immigration entry data and Medicare records.
- Any DET payment, child benefit, allowance or service data that may be of relevance to welfare eligibility will be validated through originating sources i.e. Family Day Care educators and operators themselves or through further validation with the DET.
- Quality control for accuracy and reliability of data will occur at 2 levels before customers are contacted. This will involve high level scrutiny of the data against current reported activity on individual DET and department records. Secondly, all preliminary matches will be examined by departmental analysts and validated against the most recent DET FDC and Jobs, Education, Training Child Care Fee Assistance (JETCCFA) payment files.

4.2 Data Integrity

DHS maintains a high level of data integrity. Measures taken to maintain integrity levels include designing systems that will not accept records that are incomplete, and identifying and correcting records that have data items that are inadequate or corrupt.

DHS' data, or more specifically those data items used in the matching process, are standardised. Standardisation is the process whereby data items such as name, address and date of birth are converted in such a way as to ensure that these items are consistent across both organisations' files.

4.3 Data Security

The DET provide regular files to DHS using the Fedlink email enclave. This is an encrypted mechanism, which provides secure and trusted communications across government jurisdictions. DHS' receiving mailbox is also a restricted mailbox which can only be accessed by authorised personnel.

DHS staff are subject to existing security controls and confidentiality provisions of the *Social Security (Administration) Act 1999*. Access to DHS' computer centres is strictly controlled and entry properly authorised. DHS' security system provides protection and control of dataset access, system entry and program integrity. Security features include logon identification codes, passwords and security groupings to ensure that access to information is on a needs only basis.

DET is responsible for its own security with respect to its staff and access to the data provided to DHS. Existing security arrangements in DHS automatically log user access to data files.

5. The Matching Process

This data matching program identifies customers, who may have income that has not been correctly declared to DHS. Customers who appear on both the DET and DHS' files are considered to be 'matches'.

The matching process will use various elements and/or combinations of the following fields:

- standardised first name
- standardised surname
- date of birth, and
- address.

DET also provide information that relates to their specific records, which relate to the following fields:

- Child Care Benefit Paid (CCB)
- Jobs, Education, Training Child Care Fee Assistance (JETCCFA)
- Total Fees Charged.

A technical standards report can be found at Appendix A.

6. Action Resulting from the Program

Following the provision of matched records from the DET to DHS, DHS applies compliance risk rules whereupon a recipient may be asked via letter for a response to explain any income discrepancy.

Where DHS has determined that administrative action is necessary to recover an amount paid to a recipient on the basis of incorrect information, the recipient is able to request an internal review of this decision. There is no time limit applicable to a recipient's right to internal review. If not satisfied with the outcome of an internal review, a recipient can also seek independent review by applying to the Administrative Appeals Tribunal (AAT).

7. Time Limits Applying to the Program

Since July 2015 FDC data has been provided monthly and the matching is conducted on a monthly basis.

DHS does not create a permanent register or database on matched or non-matched selections as part of this protocol.

All external data received from DET that is no longer required is destroyed in line with Guideline 7 of the *Guidelines on Data-matching in Australian Government Administration*.

8. Reasons for Conducting the Program

8.1 Relationship with the Agencies Lawful Functions

The program is related to DHS' lawful function of limiting payments to those eligible under relevant legislation. The *Social Security Act 1991* and the *Social Security (Administration) Act 1999* provide eligibility criteria that must be met to enable payments to be made. These requirements are given to payment recipients through written advice authorised under different sections of these Acts for different payment types.

The *Child Support (Registration and Collection) Act 1988* and the *Child Support (Assessment) Act 1989* provide that customers are required to advise correct financial status to enable accurate assessment and collection rates.

8.2 Social Considerations

Welfare is often topical and of interest to the media and the general public. There are some key social issues associated with the measure:

- That only persons entitled to receive payments from DHS do so and receive correct entitlements.
- The desire of taxpayers for the income support system to ensure integrity in its payments and services.
- The protection of an individual's right to privacy.

In particular, there is strong support in the community for an income support system that directs available funds only to those who are eligible for assistance. The program helps to achieve this in two ways:

- through strengthening controls in DHS' payment systems, it reduces government outlays from DHS' programs
- the existence of effective controls in payment systems soon become evident to the community and rapidly increases voluntary compliance.

Suitable safeguards against unreasonable intrusion into the privacy of individuals are built into the data-matching arrangements. Matching is conducted in accordance with the Privacy Commissioner's *Guidelines on Data-matching in Australian Government Administration*.

9. Legal Authority

9.1 DHS

The disclosure of information to the DET is authorised by the social security law, as is the collection of matched information returned by the DET. This is because it is necessary for the proper administration of payments and services under the social security law. Specifically subsection 202(2)(d) of the *Social Security (Administration) Act 1999* authorises DHS' involvement in the data matching as it is necessary for the purposes of the social security law.

Similarly, subsection 16(2A) of the *Child Support (Registration and Collection) Act 1988* and the subsection 150(2A) of the *Child Support (Assessment) Act 1989* provide for the collection, use and disclosure of protected information where necessary for the administration of the child support legislation.

APP 6 does not limit the disclosure of personal information by an agency where that disclosure is required or authorised by or under law. As the DET information involved in this data matching program is obtained by DHS under sections 192 and 195 of the *Social Security (Administration) Act 1999*, APP 6 does not limit its disclosure to DHS.

9.2 DET

DET legislation authorises the Secretary to disclose DET information to eligible Commonwealth government agencies that have a legal right to the information as specified by section 162 of the *A New Tax System (Family Assistance) (Administration) Act 1999*. This provision allows for the disclosure of such information for the purposes of administering family assistance or social security law.

10. Disclosure of Information Provisions

DET only releases sufficient information to DHS to allow it to determine whether there is a discrepancy between the information reported by the recipient to DHS and whether administrative action needs to be considered.

11. Alternative Methods

In 2013 DHS conducted review processes from tip offs. This work formed part of a broader compliance operation prior to the data exchange for FDC data being established.

12. Prior Data Match Programs

This program commenced in December 2014. There were no FDC data matching programs prior to this.

13. Costs and Benefits

Prior to the program commencing, the 2013/14 operation conducted 107 reviews with attributable annualised savings of approximately \$1.8 million. Following this operation the program commenced in December 2014 and raised \$1.5 million in annualised savings over the remainder of the 2014/15 financial year. In 2015/16 the program raised approximately \$55 million in annualised savings.

Appendix A – Technical Standards report

Description of Data

Data from DET to DHS

The DET provide the following information to DHS:

Field Name	Description
ORG_ID	Organisation ID
CCB_ID	Child Care Benefit ID
FY	Financial Year
CARER_ID	Carer ID
NAME_TITLE	Customer Title (e.g. Mr, Mrs, Dr etc.)
FIRST_NAME	Customer First Name
LAST_NAME	Customer Surname
STREET	Customer Address (Street and Number)
SUBURB	Customer Address Suburb
STATE	Customer Address State
POST_CODE	Customer Address Postcode
DOB	Customer Date of Birth (YYYYMMDD)
START_DATE	Date commenced working in the organisation
END_DATE	Date ceased working in organisation (null if still currently working)
EFFECTIVE_DATE	Date of notification from service
FEES_CHARGED	Total Child Care Fees charged by Customer
CCB_PAID	Child Care Benefit paid to Customer for children they look after in the service
JET_PAID	JET paid to Customer for children they look after in the service
SERVICE	Business Name of the Child Care service
ABN	ABN of the Child Care Service

Matching Techniques

Identify Matching

The identity data matching of the two information sources is conducted by DHS. DHS target recipients where there is a discrepancy between payments received from DET and income declared to DHS.

Income Matching

Information is extracted from the DHS Enterprise Data Warehouse for both current and the target financial years including:

- demographic data as required
- payment type and history
- disclosed income, and
- disclosed assets.

Business rules are applied to this data to check if there is a difference in the income reported to DHS compared to the income reported by DET.

Where a recipient is identified as having a difference, the selected case will then be loaded into DHS core systems for compliance action.

Risks

Incorrect identity matches

DHS uses sophisticated identity matching techniques to ensure the correct customer is identified from data provided by DET. This technique uses multiple details to obtain an identity match. For example, where a Customer Reference Number (CRN), name, address and date of birth are available all items are used in the identity matching process.

Very high confidence matches will occur where all fields are matched to a customer in DET systems. Additional manual processes may be undertaken where high confidence identity matches do not occur.

Data quality controls and audit

When compliance action is proposed, additional checks will take place to ensure the correct DHS recipient has been identified. DHS recipients will be provided with the opportunity to verify the accuracy of the information before any compliance action is taken.

Security and confidentiality

All DHS computer systems are strictly controlled with features including:

- system access controls and security groupings
- log in identification codes and password protection
- full audit trails of data files and system accesses.



Program Protocol

Data-matching between Australian Taxation Office and Department of Human Services

Trust Beneficiary

July 2017

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1. Description of the Program Protocol

1.1 Purpose

The purpose of the program protocol is to:

- identify the matching agency and the source agency
- detail the direct relationship of the program to the performance of the lawful functions or activities of the matching agency
- set out the legal basis for any collection, use or disclosure of personal information involved in the program
- outline the objectives of the program, the procedures to be employed, the nature and frequency of the matching covered by the program and the justifications for it
- explain what methods, other than data-matching, were available and why they were rejected
- detail any cost/benefit analysis or other measures of effectiveness, which were taken into account in deciding to initiate the program
- outline the technical controls proposed to ensure data quality, integrity and security in the conduct of the program
- outline the nature of the action proposed to be taken in relation to the results of the program, including any letters to be used by the agency involved
- indicate what form of notice is to be given, or is intended to be given to individuals whose privacy is affected by the program, and
- specify any time limits on the conduct of the program.

1.2 Requirement for a Program Protocol

The Information Commissioner's *Guidelines on Data-matching in Australian Government Administration* specify that a program protocol be prepared by agencies conducting certain data-matching programs. These guidelines are voluntary, but represent the Information Commissioner's view of best practice. The Department of Human Services (DHS) complies with these guidelines.

1.3 Definition of Data-Matching

Data-matching is the comparison of two or more sets of data to identify similarities or discrepancies. In the context of this protocol, the term data-matching is used to denote the use of computer techniques to compare data found in two or more computer files to identify cases where there is a risk of incorrect payment.

DHS observes the *Australian Privacy Principles (APP)* as provided in Schedule 1 of the *Privacy Act 1988* (Privacy Act). Individuals who consider that an agency has interfered with their privacy may complain to the Office of the Australian Information Commissioner.

2. Description of the Program

2.1 Summary of the Program

DHS delivers a range of programs for payments and services on behalf of the Commonwealth. These payments and services are delivered in accordance with agreements with client agencies. To maintain the integrity of these payments and services, DHS undertakes compliance activities to ensure ongoing entitlement and eligibility.

The Australian Taxation Office (ATO) trust data-matching detects customers who may not be declaring their involvement as a beneficiary of a discretionary and/or hybrid trust to DHS.

This data-matching program commenced in 2001. A notice announcing the commencement of the matching program was originally published in the Commonwealth of Australia Government Gazette on 12 December 2001.

DHS provides the ATO with a file of recipients who:

- have received a payment within the relevant financial year
- are partnered to a recipient; or
- have an outstanding debt.

The ATO then match this file with its trust tax return records and returns a file to DHS twice a year. On receipt of these files DHS compares the information with the trust details on the recipient's DHS record. If the trust has not been declared to DHS, the recipient is selected for review. When a recipient has been matched and they have a partner who is an income support recipient, a review is generated for the partner as the undisclosed income may impact on the partner's entitlement.

An interest in a trust is considered to include, but not be limited to:

- trust distributions returned to the trust
- other loans, and
- assets transferred to the trust, including those transferred in the 5 years before starting to receive a payment administered by the department.

2.2 Objectives

The objectives of this matching program are to:

- ensure that income support payments are only made to those individuals who are entitled to receive them
- detect and address non-compliance
- provide net savings by detecting overpayments and recovering debt.

3. Agencies Involved

3.1 Source Agency

The source agencies that supply data for the purposes of this program are:

- DHS
- ATO

3.2 Matching Agency

The key matching agency involved in this program is the ATO. DHS provides a payment recipient file to the ATO for identity matching. ATO provides a file to DHS twice a year.

3.3 Primary User Agency

DHS is the agency that makes the most substantial use of the program's results. It receives the matched data from the ATO to identify potential non-compliance.

4. Data Issues

4.1 Data Quality

Poor quality data is of limited value in data-matching. DHS verifies the integrity of the data received from the ATO for such things as correct format and ensures data is present in all mandatory fields.

Data quality mechanisms include:

- The ATO only return high confidence match results to DHS.
- DHS seek validation from the recipient of any investment income reported that may impact welfare eligibility.
- Where recipients provide updated or corrected information, DHS takes this into account when determining the type and need for administrative action.

DHS' experience in matching the same data with the same matching criteria shows an extremely low number of instances of incorrect matching. Despite this, the department has a well-established process to deal with these instances to reduce or eliminate potential privacy impacts.

4.2 Data Integrity

DHS maintains a high level of data integrity. Measures taken to maintain integrity levels include designing systems that will not accept records that are incomplete, and identifying and correcting records that have data items that are inadequate or corrupt.

4.3 Data Security

The ATO and DHS exchange data using the dedicated mainframe to mainframe Optus Evolve link. This mechanism provides secure and trusted communications across government jurisdictions.

The ATO data received by DHS is held in secure Teradata and SAP HANA environments. These are core systems that employ strict security controls. Only departmental employees with a business need to access data are able to view the ATO data provided under this program.

DHS staff are subject to existing security controls and confidentiality provisions of the *Social Security (Administration) Act 1999*. Access to the department's computer centres is strictly controlled and entry properly authorised. DHS' security system provides protection and control of dataset access, system entry and program integrity. Security features include log on identification codes, passwords and security groupings to ensure that access to information is on a needs only basis.

The ATO is responsible for its own security with respect to its staff and access to the data provided by the department. The ATO is subject to existing security controls and subject to the *Privacy*

Act 1988, Crimes Act 1914 and the Public Service Act 1999. Access to the ATO's computer systems is limited and is subject to requests for system access which include reminders about privacy and security obligations. Security features include log on identification codes and passwords. All access to systems is monitored and logged.

Existing security arrangements in the department automatically log user access to data files.

5. The Matching Process

The identity data matching of the two information sources is initially conducted by the ATO. The output of this matching is provided to DHS as 'matched' records.

DHS use these matched records to identify recipients, who may have income that has not been correctly declared to DHS.

DHS performs an additional identity match of all 'matched' ATO trust records with DHS records, by comparing various elements and/or combinations of the following fields:

- Gender
- Surname
- First Name
- Other Given Name
- Year of Birth
- Month of Birth
- Day of Birth
- Address Line 1
- Address Line 2
- Locality
- Post Code
- State Code

To uphold an individual's right to privacy, the resulting matches are only those where ATO records have the same identity details as DHS recipients. In addition to this, DHS only exchanges information for recipients who:

- have received a payment within the relevant financial year
- are partnered to a recipient, or
- have an outstanding debt.

The ATO then provide the trust information only for these specific matched records. A technical standards report can be found at Appendix A.

6. Action Resulting from the Program

Following the provision of matched records from the ATO to DHS, DHS applies compliance risk rules whereupon a recipient may be asked via letter for a response to explain any discrepancy in declared income.

Where a recipient disagrees with the information presented, they are provided an opportunity to adjust the information and provide supporting evidence. DHS takes this information into account when determining administrative action.

Where a recipient does not provide a response within the specified timeframe, DHS makes the determination of appropriate administrative action based on the information provided by the ATO.

Where DHS has determined that administrative action is necessary to recover an amount paid to a recipient on the basis of incorrect information, the recipient is able to request an internal review of this decision. There is no time limit applicable to a recipient's right to internal review. While a review is being conducted, debt repayments can be paused.

If not satisfied with the outcome of an internal review, a recipient can also seek independent review by applying to the Administrative Appeals Tribunal (AAT).

7. Time Limits Applying to the Program

The matching of the ATO trust data is conducted bi-annually. The ATO provide two files, one following the completion of the financial year, and an updated file containing trust information.

DHS does not create a permanent register or database on matched or non-matched selections as part of this protocol.

All external data received from the ATO that is no longer required is destroyed in line with Guideline 7 of the *Guidelines on Data-matching in Australian Government Administration*.

8. Reasons for Conducting the Program

8.1 Relationship with the Agencies Lawful Functions

The program is related to the department's lawful function of limiting payments to those eligible under relevant legislation. The *Social Security Act 1991* and the *Social Security (Administration) Act 1999* provide eligibility criteria that must be met to enable payments to be made. These requirements are given to payment recipients through written advice authorised under different sections of these Acts for different payment types.

8.2 Social Considerations

Welfare is often topical and of interest to the media and the general public. There are some key social issues associated with the measure:

- That only persons entitled to receive payments from the department do so and receive correct entitlements.
- The desire of taxpayers for the income support system to ensure integrity in its payments and services.
- The protection of an individual's right to privacy.

In particular, there is strong support in the community for an income support system that directs available funds only to those who are eligible for assistance. The program helps to achieve this in two ways:

- through strengthening controls in the department's payment systems, it reduces government outlays from the department's programs, and
- the existence of effective controls in payment systems soon become evident to the community and rapidly increases voluntary compliance.

Suitable safeguards against unreasonable intrusion into the privacy of individuals are built into the data-matching arrangements. Matching is conducted in accordance with the *Guidelines on Data-matching in Australian Government Administration*.

9. Legal Authority

9.1 DHS

The disclosure of information to the ATO is authorised by the social security law, as is the collection of matched information returned by the ATO. This is because it is necessary for the proper administration of payments and services under the social security law. Specifically subsection 202(2)(d) of the *Social Security (Administration) Act 1999* authorises DHS' involvement in the data matching as it is necessary for the purposes of the social security law.

APP 6 does not limit the disclosure of personal information by an agency where that disclosure is required or authorised by or under law. As the DET information involved in this data matching program is obtained by the department under sections 192 and 195 of the *Social Security (Administration) Act 1999*, APP 6 does not limit its disclosure to the department.

9.2 ATO

The *Taxation Administration Act 1953* authorises the ATO to disclose ATO information to an Agency Head (within the meaning of the *Public Service Act 1999*) of an agency dealing with matters relating to the social security law where the disclosure is for the purpose of administering that law.

10. Disclosure of Information Provisions

The ATO only releases sufficient information to the department to allow it to determine whether there is a discrepancy between the information reported by the recipient to the department and the investment information reported to the ATO and whether administrative action needs to be considered.

11. Alternative Methods

There is no alternative method or single source of information available in relation to trusts and trust beneficiaries.

Certain trusts, such as superannuation trusts, are covered by a regulatory authority or have detailed information collected in a systematic manner, by a limited number of organisations, such as public unit trusts. However, most trusts are private agreements that are not covered by any regulatory authority and do not have any detailed information collected about them.

The only other source of undeclared trusts are identified via community tip-offs.

This program of matching trust records with the ATO minimises the resources required to detect recipients who may have not declared their involvement in a trust, therefore identifying recipients at risk of incorrect payment.

12. Prior Data Match Programs

Between January 2001 and June 2001, a pilot program was undertaken and demonstrated that:

- there were significant issues with welfare recipients correctly reporting their involvement in a trust to the department, and
- a recipient's involvement in a trust was not detected by another control measure at that time.

13. Costs and Benefits

During the first year of inception in 2001-02, this measure generated annualised savings of over \$3.1 million with the completion of 1,500 trust reviews. Since then the program has continued to garner considerable returns. During 2015-16, this measure achieved savings of over \$7.2 million with the completion of 1,163 trust reviews.

Appendix A – Technical Standards report

Description of Data

Data from DHS to ATO

The following data items to be provided to the ATO by DHS for identity matching purposes.

- Customer Reference Number
- Gender
- Name
- Date of Birth
- Address

Table 1 – Centrelink Identity File

Data item	Description
REF-NUMBER	Centrelink Reference Number
GENDER	Gender
SRNM	Surname
1ST-NM	First Name
OTHR-GVN-NM	Other Given Name
BRTH-YR	Year of Birth
BRTH-MTH	Month of Birth
BRTH-DAY	Day of Birth
ADDR-LN-1	Address Line 1
ADDR-LN-2	Address Line 2
LCLTY-NM	Locality
POST-CD	Post Code
STATE-CD	State Code

Data from ATO to DHS

The ATO provides two files to DHS:

- Extract 1 - early lodgers of income tax return data to ATO.
- Extract 2 - late lodgers of income tax return data to ATO.

Table 2 – Header Record:

Field Name	Description, Rules & Values, Comments
RECORD-	= 849
RECORD-TYPE	Indicates this record is the header record, 'HEADER'.
DATE-OF-	Date extract file created. Format ccyyymmdd.
EXTRACT-NM	Describes the extract, 'ATO TRUST BENEFICIARIES EXTRACT'.
INCM-YR	Financial year for which the data was extracted.
Filler	

Table 3 – Detail Record:

Field Name	Description, Rules & Values, Comments
RECORD-LENGTH	= 849
RECORD-TYPE	Indicates this record is the detail record, 'DETAIL'
EXT_REF_NUM	External Reference Number (i.e. for Centrelink this is the CRN)
PYE-QTD-SRNM	Surname of the beneficiary
PYE-QTD-1ST-NM	First given name of the beneficiary
PYE-QTD-2ND-NM	Second given name of the beneficiary (may be blank)
B-U-21-DT	Beneficiary Date Of Birth.
PYE-QTD-ADDR-LN-1	Address Line 1 Of The Beneficiary
PYE-QTD-ADDR-LN-2	Address Line 2 Of The Beneficiary (May Be Blank)
PYE-QTD-LCLTY-NM	Name Of Suburb, Town Or City Of The Beneficiary
PYE-QTD-STATE-CD	State Code Of The Beneficiary
PYE-QTD-PC	Postcode Of The Beneficiary
PP-I-SHR-AMT	Share Of Income (Primary Production)
O-INCM-SHR-AMT	Share Of Income (Non-Primary Production)
P-T-TFN	The Tax File Number Of The Trust.
TRST-ESTE-TYP	Describes The Type Of Trust. As Follows: 'D' - Deceased Estate; 'F' - Fixed Trust Other Than Fixed Unit Trust Or A Public Unit Trust Described In 'U', 'P' Or 'Q'.; 'H' - Hybrid Trust; 'S' - Discretionary Trust Where The Main Source Of Income Of The Trust Is From Service And/Or Management Activities; 'T' - Discretionary Trust Where The Main Source Of Income Of The Trust Is From Trading Activities; 'I' - Discretionary Trust Where The Main Source Of Income Of The Trust Is From Investment Activities; 'M' Cash Management Unit Trust; 'U' - Fixed Unit Trust Other Than A Public Trust Described In 'P' Or 'Q'.; 'P' - Listed Public Unit Trust Other Than A Cash Management Unit Trust; Or
PYR-N-IDV-NM-1	Name Of Trust Line 1
PYR-N-IDV-NM-2	Name Of Trust Line 2 (May Be Blank)
PYR-ADDR-LN-1	Address Line 1 Of The Trust
PYR-ADDR-LN-2	Address Line 2 Of The Trust (May Be Blank)
PYR-LCLTY-NM	Suburb, Town Or City Of The Trust
PYR-STATE-CD	State Code Of The Trust
PYR-PC	Postcode Of The Trust
TRT-ABN	Trust ABN (May Be Zero)
T-PTNR-SRNM	Surname Of The Trustee Or Name Line 1 for Corporate Trustee.
T-PTNR-GVN-NM	Given Name Of Trustee Or Name Line 2 for Corporate Trustee
COY-ABN-NUM	Trustee ABN (May Be Zero)
N-P-B-INCM-AMT	Net Income Or Loss From Business - Primary Production
N-O-B-INCM-AMT	Net Income Or Loss From Business - Non-Primary Production
PP-DIST-PNP	Primary Production Distribution from Partnerships
PP-DIST-TRT	Primary Production Distribution from Trusts
PP-DIST-DED	Primary Production Deductions Relating to Distribution
NPP-DIST-PNP	Non-Primary Production Distribution From Partnerships

Field Name	Description, Rules & Values, Comments
NPP-DIST-TRT	Non-Primary Production Distribution From Trusts
NPP-DIST-DED	Non-Primary Production Deductions Relating to Distribution
NET-RENT	Net Rent
GRSS-INT	Gross Interest
FRNKD-DIV	Franked Dividends
UNFRNKD-DIV	Unfranked Dividends
IMP-CR	Imputation Credit
T-N-I-LSS-AMT	Total Net Income/Loss
TOTL-AST-AMT	Total Assets
TOTL-LIAB-AMT	Total Liabilities
IMP-CR-SHR-AMT	Imputation Credit for Trust Beneficiary
N-C-GAIN-AMT	Net Capital Gain amount for Trust Beneficiary
A-FRGN-INCM-AMT	Attributed Foreign Income amount for Trust Beneficiary
TA_CNTCT_NM	Tax Agent Contact Name
TA_PH_NUM	Tax Agent Phone Number

Table 4 – Footer Record:

Field Name	Description, Rules & Values, Comments
RECORD-LENGTH	= 849
RECORD-TYPE	= 'FILE-TOTAL'
CNT-RECS	Count of records in this file (including header, detail and file-total)
CNT-PAYEE	Count of unique detail records (external reference numbers)
Filler	Spaces

Matching Techniques

Identity Matching

The identity data matching of the two information sources is conducted by the ATO. The output of this matching is provided to DHS as 'matched' records. DHS target recipients where there is a discrepancy between investments declared to the ATO and investments declared to DHS.

This could be:

- Recipient and Spouse
- Spouse but not recipient
- Recipient but not spouse

How DHS detect the discrepancy depends on the information gathered. DHS may have to use different business rules to obtain an accurate and valid result.

Income Matching

Information is extracted from the DHS Enterprise Data Warehouse for both current and the target financial years including:

- Recipients name
- Marital status

- Demographic data
- Payment type
- Payment history
- Disclosed trust information

Business rules are applied to this data to check if there is a difference in the information reported to DHS compared to the information reported to the ATO.

Where a recipient or spouse is identified as having a difference, the selected case will then be loaded into DHS core systems for compliance action.

Risks

Incorrect identity matches

The ATO uses sophisticated identity matching techniques to ensure they identify the correct taxpayer from data provided by DHS. This technique uses multiple details to obtain an identity match. For example, where a Customer Reference Number (CRN), name, address and date of birth are available all items are used in the identity matching process.

Very high confidence matches will occur where all fields are matched to a taxpayer in ATO systems. Additional manual processes may be undertaken where high confidence identity matches do not occur.

Data quality controls and audit

When compliance action is proposed, additional checks will take place to ensure the correct DHS recipient or spouse has been identified. DHS recipients will be provided with the opportunity to verify the accuracy of the information before any compliance action is taken.

Security and confidentiality

All DHS computer systems are strictly controlled with features including:

- system access controls and security groupings
- login identification codes and password protection
- full audit trails of data files and system accesses.



Program Protocol

Data-matching between Australian Taxation Office and Department of Human Services

Annual Investment Income Report (AIIR)

July 2017

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1. Description of the Program Protocol

1.1 Purpose

The purpose of the program protocol is to:

- identify the matching agency and the source agency
- detail the direct relationship of the program to the performance of the lawful functions or activities of the matching agency
- set out the legal basis for any collection, use or disclosure of personal information involved in the program
- outline the objectives of the program, the procedures to be employed, the nature and frequency of the matching covered by the program and the justifications for it
- explain what methods, other than data-matching, were available and why they were rejected
- detail any cost/benefit analysis or other measures of effectiveness, which were taken into account in deciding to initiate the program
- outline the technical controls proposed to ensure data quality, integrity and security in the conduct of the program
- outline the nature of the action proposed to be taken in relation to the results of the program, including any letters to be used by the agency involved
- indicate what form of notice is to be given, or is intended to be given to individuals whose privacy is affected by the program, and
- specify any time limits on the conduct of the program.

1.2 Requirement for a Program Protocol

The Information Commissioner's *Guidelines on Data-matching in Australian Government Administration* specify that a program protocol be prepared by agencies conducting certain data-matching programs. These guidelines are voluntary, but represent the Information Commissioner's view of best practice. The Department of Human Services (DHS) complies with these guidelines.

1.3 Definition of Data-Matching

Data-matching is the comparison of two or more sets of data to identify similarities or discrepancies. In the context of this protocol, the term data-matching is used to denote the use of computer techniques to compare data found in two or more computer files to identify cases where there is a risk of incorrect payment.

DHS observes the *Australian Privacy Principles (APP)* as provided in Schedule 1 of the *Privacy Act 1988* (Privacy Act). Individuals who consider that an agency has interfered with their privacy may complain to the Office of the Australian Information Commissioner.

2. Description of the Program

2.1 Summary of the Program

DHS delivers a range of programs for payments and services on behalf of the Commonwealth. These payments and services are delivered in accordance with agreements with client agencies.

To maintain the integrity of these payments and services, DHS undertakes compliance activities to ensure ongoing entitlement and eligibility.

In the 2011-12 Budget, the Australian Government announced the Fraud Prevention and Compliance – Improving Compliance with Income Reporting Budget Measure.

This measure involves the exchange of data between the Australian Taxation Office (ATO) and DHS to enable a comparison of information held by the ATO and the information that payment recipients have reported to DHS to identify potential non-compliance. Specifically, the measure seeks to identify those at risk of not declaring or incorrectly their investments or investment returns.

Annual Investment Income Report (AIIR) reviews commenced in January 2012 and currently target income support recipients with two investment types:

- interest bearing accounts, and or
- term deposits.

2.2 Objectives

The objectives of this matching program are to:

- ensure that income support payments are only made to those individuals who are entitled to receive them
- detect and address non-compliance, and
- provide net savings by detecting overpayments and recovering debt.

3. Agencies Involved

3.1 Source Agency

The source agencies that supply data for the purposes of this program are:

- DHS
- ATO

3.2 Matching Agency

The key matching agency involved in this program is the ATO. The department provides payment recipient files to the ATO for identity matching. The ATO provides an AIIR file to the department twice a year.

3.3 Primary User Agency

DHS is the agency that makes the most substantial use of the program's results. It receives the matched data from the ATO to identify potential non-compliance.

4. Data Issues

4.1 Data Quality

Poor quality data is of limited value in data matching. DHS verifies the integrity of the data received from the ATO for such things as correct format and ensures data is present in all mandatory fields.

Data quality mechanisms include:

- The ATO only return high confidence match results to DHS.
- DHS seek validation from the recipient of any investment income reported that may impact welfare eligibility.
- Where recipients provide updated or corrected information, DHS takes this into account when determining the type and need for administrative action.

DHS' experience in matching the same data with the same matching criteria shows an extremely low number of instances of incorrect matching. Despite this, DHS has a well-established process to deal with these instances to reduce or eliminate potential privacy impacts.

4.2 Data Integrity

DHS maintains a high level of data integrity. Measures taken to maintain integrity levels include designing systems that will not accept records that are incomplete, and identifying and correcting records that have data items that are inadequate or corrupt.

4.3 Data Security

The ATO and DHS exchange data using the dedicated mainframe to mainframe Optus Evolve link. This mechanism provides secure and trusted communications across government jurisdictions.

The ATO data received by DHS is held in secure Teradata and SAP HANA environments. These are core systems that employ strict security controls. Only DHS employees with a business need to access data are able to view the ATO data provided under this program.

DHS staff are subject to existing security controls and confidentiality provisions of the *Social Security (Administration) Act 1999*. Access to DHS' computer centres is strictly controlled and entry properly authorised. The department's security system provides protection and control of dataset access, system entry and program integrity. Security features include log on identification codes, passwords and security groupings to ensure that access to information is on a needs only basis.

The ATO is responsible for its own security with respect to its staff and access to the data provided by the department. The ATO is subject to existing security controls and subject to the *Privacy Act 1988*, *Crimes Act 1914* and the *Public Service Act 1999*. Access to the ATO's computer systems is limited and is subject to requests for system access which include reminders about privacy and security obligations. Security features include logon identification codes and passwords. All access to systems is monitored and logged.

Existing security arrangements in the department automatically log user access to data files.

5. The Matching Process

The identity data matching of the two information sources is initially conducted by the ATO. The output of this matching is provided to DHS as 'matched' records.

DHS use these matched records to identify recipients, who may have income that has not been correctly declared to DHS.

DHS performs an additional identity match of all 'matched' ATO AIIR records with DHS records, by comparing various elements and/or combinations of the following fields:

- Gender
- Surname
- First Name
- Other Given Name
- Year of Birth
- Month of Birth
- Day of Birth
- Address Line 1
- Address Line 2
- Locality
- Post Code
- State Code

To uphold an individual's right to privacy, the resulting matches are only those where ATO records have the same identity details as DHS recipients. In addition to this, DHS only exchanges information for recipients who:

- have received a payment within the relevant financial year
- are partnered to a recipient, or
- have an outstanding debt.

The ATO then provide the AIIR investment interest information only for these specific matched records. A technical standards report can be found at Appendix A.

6. Action Resulting from the Program

Following the provision of matched records from the ATO to DHS, DHS applies compliance risk rules whereupon a recipient may be asked via letter for a response to explain any discrepancy.

Where a recipient disagrees with the information presented, they are provided an opportunity to adjust the information and provide supporting evidence. DHS takes this information into account when determining administrative action.

Where a recipient does not provide a response within the specified timeframe, DHS makes the determination of appropriate administrative action based on the information provided by the ATO.

Where DHS has determined that administrative action is necessary to recover an amount paid to a recipient on the basis of incorrect information, the recipient is able to request an internal review of this decision. There is no time limit applicable to a recipient's right to internal review. While a review is being conducted, debt repayments can be paused.

If not satisfied with the outcome of an internal review, a recipient can also seek independent review by applying to the Administrative Appeals Tribunal (AAT).

7. Time Limits Applying to the Program

The matching of the ATO AIIR data is conducted bi-annually.

DHS does not create a permanent register or database on matched or non-matched selections as part of this protocol.

All external data received from the ATO that is no longer required is destroyed in line with Guideline 7 of the *Guidelines on Data-matching in Australian Government Administration*.

8. Reasons for Conducting the Program

8.1 Relationship with the Agencies Lawful Functions

The program is related to DHS' lawful function of limiting payments to those eligible under relevant legislation. The *Social Security Act 1991* and the *Social Security (Administration) Act 1999* provide eligibility criteria that must be met to enable payments to be made. These requirements are given to payment recipients through written advice authorised under different sections of these Acts for different payment types.

8.2 Social Considerations

Welfare is often topical and of interest to the media and the general public. There are some key social issues associated with the measure:

- That only persons entitled to receive payments from the department do so and receive correct entitlements.
- The desire of taxpayers for the income support system to ensure integrity in its payments and services.
- The protection of an individual's right to privacy.

In particular, there is strong support in the community for an income support system that directs available funds only to those who are eligible for assistance. The program helps to achieve this in two ways:

- through strengthening controls in the department's payment systems, it reduces government outlays from the department's programs, and
- the existence of effective controls in payment systems soon become evident to the community and rapidly increases voluntary compliance.

Suitable safeguards against unreasonable intrusion into the privacy of individuals are built into the data-matching arrangements. Matching is conducted in accordance with the *Guidelines on Data-matching in Australian Government Administration*.

9. Legal Authority

9.1 DHS

The disclosure of information to the ATO is authorised by the social security law, as is the collection of matched information returned by the ATO. This is because it is necessary for the

proper administration of payments and services under the social security law. Specifically subsection 202(2)(d) of the *Social Security (Administration) Act 1999* authorises DHS' involvement in the data matching as it is necessary for the purposes of the social security law.

APP 6 does not limit the disclosure of personal information by an agency where that disclosure is required or authorised by or under law. As the information involved in this data matching program is obtained by the department under sections 192 and 195 of the *Social Security (Administration) Act 1999*, APP 6 does not limit its disclosure to the department.

9.2 ATO

The *Taxation Administration Act 1953* authorises the ATO to disclose information to DHS where the disclosure is for the purpose of administering the social security law.

10. Disclosure of Information Provisions

The ATO only releases sufficient information to the department to allow it to determine whether there is a discrepancy between the information reported by the recipient to the department and the investment information reported to the ATO and whether administrative action needs to be considered.

11. Alternative Methods

There are other data-matching programs used by DHS to detect recipients who have failed to declare, or failed to correctly declare, investments or investment returns:

1. ATO Trust Beneficiary — this data-matching commenced in January 2001. It identifies income support recipients who have not disclosed their involvement in a discretionary and or hybrid trust to DHS. DHS provides the ATO with a file for a particular financial year. The ATO then matches this file with Trust Tax Return records and returns a file to DHS twice a year. On receipt of these files DHS compares the information with the trust details on the recipient's DHS record. If the trust has not been declared to DHS, the recipient selected for review.
2. ATO/ASIC Companies — this data-matching commenced in April 2000. It detects income support recipients who have not disclosed their involvement in a company, while in receipt of payments. DHS provides the ATO with a file for a particular financial year. The ATO then matches this file with company tax records and returns a file to DHS. The Australian Securities and Investments Commission (ASIC) provide DHS with director and shareholder data. DHS compares the ASIC and ATO information with the company details on the recipient's record. If an involvement in a company has not been declared the recipient is selected for review.
3. ATO Investment Property — this data-matching commenced in August 2000. It detects income support recipients who may not be declaring ownership of investment property assets. DHS provides the ATO with a file for a particular financial year. The ATO then matches this file with investment tax return records and returns a file to DHS twice a year. On receipt of these files DHS compares the information with the investment property details on the recipient's DHS record. If the property has not been declared to DHS, the recipient is selected for review.
4. Comsuper — this data-matching commenced in July 1999. It detects income support recipients who may not be declaring their Commonwealth superannuation correctly to DHS. The Commonwealth Superannuation Corporation (CSC) provide DHS with a file of all CSC recipients. DHS uses this data to update the CPI payment increases on a recipient's record.

Recipients who did not declare or incorrectly declared their superannuation, are selected for review.

5. Land Titles Office (LTO) — this data-matching commenced in December 2007 and detects income support recipients who have not declared property assets, other than their own home. DHS collects land title office data from the state and territory offices on an ad hoc basis. The LTO data is then matched with the property details on a recipient's DHS record. If the property has not been declared to DHS, the recipient is selected for review.

The program of matching AIIR records from the ATO seeks to complement these programs by detecting recipients who may not have been identified by the above-mentioned methods, or who may have incorrectly or under-declared income or assets during their entitlement, therefore identifying recipients at risk of incorrect payment.

12. Prior Data Match Programs

Between October 2009 and October 2011, the department conducted data-matching with the Commonwealth Bank of Australia, under the Financial Institution Matching measure. This measure was an expansion of the Refresh Savings Initiative in the 2008 Federal Budget. This matching detected income support recipients identified as at risk of being incorrectly paid due to undeclared or under-declared savings and investment details. This matching ceased with the introduction of the AIIR data matching in January 2012.

13. Costs and Benefits

As announced in the 2011-12 Budget, the Fraud Prevention and Compliance – Improving Compliance with Income reporting measure was expected to return net savings of over \$53 million over 4 years. The measure achieved savings of over \$103 million. During 2015-16, this measure achieved savings of \$20.3 million with the completion of 18,887 AIIR reviews.

Appendix A – Technical Standards report

Description of Data

Data from DHS to ATO

The following data items to be provided to the ATO by DHS for identity matching purposes:

- Customer Reference Number
- Gender
- Name
- Date of Birth
- Address

Table 1 – Centrelink Identity File

Data item	Description
REF-NUMBER	Customer Reference Number
GENDER	Gender
SRNM	Surname
1ST-NM	First Name
OTHR-GVN-NM	Other Given Name
BRTH-YR	Year of Birth
BRTH-MTH	Month of Birth
BRTH-DAY	Day of Birth
ADDR-LN-1	Address Line 1
ADDR-LN-2	Address Line 2
LCLTY-NM	Locality
POST-CD	Post Code
STATE-CD	State Code

Data from ATO to DHS

The ATO provide two files to DHS:

- Extract 1 - early lodgers of ITR data to ATO.
- Extract 2 - late lodgers of ITR data to ATO.

Table 2 – Investment body identity and account details:

Field Name	Description
IB-REG-NM	Investment Body Registered Name
IB-ABN	Investment Body ABN
IB-TRDG-NM	Investment Body Trading Name
IB-ADDR	Investment Body Address
IB-LCLTY	Investment Body Locality
IB-PC	Investment Body Post Code
IB-CNTRY	Investment Body Country
IA-BSB	BSB Number
IA-LOCN	Branch Location
IA-ACNT-REF-NUM	Account Reference Number
IA-INVMT-REF-NUM	Investment Reference Number

Field Name	Description
IA-NM	Account Name
IA-CNT	Number of Investors
IA-I-E-NM	Interposed Entity Name
IA-I-E-TFN-ABN	Interposed Entity ABN
IA-INVMT-TYP	Investment Type
IA-PMT-DT	Date of Payment
IA-INVMT-TERM-NUM	Term of Investment
IA-INTST-AMT	Interest
IA-U-DIV-AMT	Unfranked Dividends
IA-FRNKD-DIV-AMT	Franked Dividends
IA-IMPVTN-CR-AMT	Imputation Credit
IA-T-AUSN-CG-AMT	Taxable Australian Capital Gain Component of UTD
IA-T-O-A-INCM-AMT	Taxable Other Australian Income Amount
IA-T-FORGN-CG-AMT	Taxable Foreign Capital Gain Component of UTD
IA-T-O-F-INCM-AMT	Taxable Foreign Income Component of UTD
IA-ORGNL-DPST-DT	Farm Mment Deposit: Date of Original Deposit
IA-DPST-AMT	Farm Mment Deposit: Amount of Deposit
IA-DPST-DT	Farm Mment Deposit: Date of Deposit
IA-TOTL-RPMT-AMT	Farm Mment Deposit: Total Amount of Repayment
IA-TFR-IN-AMT	Farm Mment Deposit: Amount of Transfer In
IA-TFR-IN-DT	Farm Mment Deposit: Date of Transfer In
IA-TFR-OUT-AMT	Farm Mment Deposit: Amount of Transfer Out
IA-TFR-OUT-DT	Farm Mment Deposit: Date of Transfer Out
IA-U-DIV-NCFI-AMT	Unfranked Dividends – not conduit foreign income
IA-U-DIV-CFI-AMT	Unfranked Dividends – conduit foreign income

Table 3 – Investor details:

Field Name	Description
I-EXT-REF-NUM	External Reference Number (may be blank)
I-SRNM	Investor Surname
I-FRST-NM	Investor First Name
I-SCND-NM	Investor Second Name
I-NI-NM	Investor Non Individual Name
I-DOB	Investor Date of Birth in format ccyyymmdd
I-SEX-CD	Investor Sex
I-ENT-TYP	Investor Entity Type
I-ABN	Investor ABN (may be zero)
I-TFN	Investor TFN
I-ADDR-LN-1	Investor Address Line 1
I-ADDR-LN-2	Investor Address Line 2
I-LCLTY-NM	Investor Locality
I-PC	Investor Post Code
I-CNTRY-NM	Investor Country
I-NR-CNTRY-CD	Investor Non resident Country Code
I-TFN-MTCH-QLTY-CD	Investor TFN Match Quality Code
I-TFN-RESLN-STS-CD	Investor TFN Match Resolution Status Code
I-ABN-MTCH-QLTY-CD	Investor ABN Match Quality Code
I-ABN-RESLN-STS-CD	Investor ABN Match Resolution Status Code
I-COMP-TFN	'COM' if COM else blank
I-TFN QTD-TFN	"Y" If R13_EDTD_RPRTD_TFN = R13_TFN. else "N"

Table 4 – Header Record:

Field Name	Description
RECORD-LENGTH	= 1376
RECORD-TYPE	Indicates this record is the header record, 'HEADER'.
DATE-OF-EXTRACT	Date extract file created. Format ccyymmdd.
EXTRACT-NM	Describes the extract, 'ATO AIIR CUSTOMER EXTRACT'.
INCM-YR	Financial year for which the data was extracted – will be the same as the financial year in the TFN Link File dataset name.
Filler	Filler

Table 5 – Detail Record:

Field Name	Description
RECORD-LENGTH	= 1376
RECORD-TYPE	Indicates this record is the detail record, 'DETAIL'
EXT-REF-NUM	External Reference Number (i.e. for DHS this is the CRN)
I-ABN	Investor ABN
FILLER	Spaces
I-ENT-TYP	Investor Entity Type
I-NI-NM	Investor Non Individual Name
I-SRNM	Investor Surname
I-FRST-NM	Investor First Name
I-SCND-NM	Investor Second Name
I-DOB	Investor Date of Birth in format ccyymmdd
I-ADDR-LN-1	Investor Address Line 1
I-ADDR-LN-2	Investor Address Line 2
I-LCLTY-NM	Investor Locality
I-PC	Investor Post Code
I-CNTRY-NM	Investor Country
I-NR-CNTRY-CD	Investor Non resident Country Code
I-SEX-CD	Investor Sex
FILLER	Spaces
IB-REG-NM	Investment Body Registered Name
IB-ABN	Investment Body ABN
IB-TRDG-NM	Investment Body Trading Name
IB-ADDR	Investment Body Address
IB-LCLTY	Investment Body Locality
IB-PC	Investment Body Post Code
IB-CNTRY	Investment Body Country
IA-BSB	BSB Number
IA-LOCN	Branch Location
IA-ACNT-REF-NUM	Account Reference Number
IA-INVMT-REF-NUM	Investment Reference Number
IA-NM	Account Name
IA-CNT	Number of Investors
IA-I-E-NM	Interposed Entity Name
IA-I-E-TFN-ABN	(Values >10000000000 only) Interposed Entity ABN
*IA-INVMT-TYP	Investment Type
IA-PMT-DT	Date of Payment

Field Name	Description
IA-INVMT-TERM-NUM	Term of Investment
IA-INTST-AMT	Interest
IA-U-DIV-AMT	Unfranked Dividends
IA-FRNKD-DIV-AMT	Franked Dividends
IA-IMPBTN-CR-AMT	Imputation Credit
IA-T-AUSN-CG-AMT	Taxable Australian Capital Gain Component of UTD
IA-T-O-A-INCM-AMT	Taxable Other Australian Income Amount
IA-T-FORGN-CG-AMT	Taxable Foreign Capital Gain Component of UTD
IA-T-O-F-INCM-AMT	Taxable Foreign Income Component of UTD
IA-ORGNL-DPST-DT	Farm Mment Deposit: Date of Original Deposit
IA-DPST-AMT	Farm Mment Deposit: Amount of Deposit
IA-DPST-DT	Farm Mment Deposit: Date of Deposit
IA-TOTL-RPMT-AMT	Farm Mment Deposit: Deposit: Total Amount of Repayment
IA-TFR-IN-AMT	Farm Mment Deposit: Amount of Transfer In
IA-TFR-IN-DT	Farm Mment Deposit: Date of Transfer In
IA-TFR-OUT-AMT	Farm Mment Deposit: Amount of Transfer Out
IA-TFR-OUT-DT	Farm Mment Deposit: Date of Transfer Out
I-C-T-RESLN-STS-CD	Investor CRN-TFN Match Resolution Status Code
I-TFN-MTCH-QLTY-CD	Investor Account-TFN Match Quality Code
I-TFN-RESLN-STS-CD	Investor Account-TFN Match Resolution Status Code
I-ABN-MTCH-QLTY-CD	Investor Account-ABN Match Quality Code
I-ABN-RESLN-STS-CD	Investor Account-ABN Match Resolution Status Code
IA-U-DIV-NCFI-AMT	Unfranked Dividends – not conduit foreign income
IA-U-DIV-CFI-AMT	Unfranked Dividends – conduit foreign income
I-COMP-TFN	'COM' if COM else blank
I-TFN QTD-TFN	"Y" If investor TFN was reported to ATO else "N"

Table 6 – Footer Record:

Field Name	Description
RECORD-LENGTH	= 1376
RECORD-TYPE	= 'FILE-TOTAL'
CNT-RECS	Count of records in this file (including header, detail and file-total records).
CNT-RECS	Count of records in this file (detail only).
Filler	Spaces

Matching Techniques

Identity Matching

The identity data-matching of the two information sources is conducted by the ATO. The output of this matching is provided to DHS as 'matched' records. DHS target recipients where there is a discrepancy between investments declared to the ATO and investments declared to DHS.

This could be:

- recipient and spouse
- spouse but not recipient
- recipient but not spouse.

How DHS detect the discrepancy depends on the information gathered. DHS may have to use different business rules to obtain an accurate and valid result.

Income Matching

Information is extracted from the DHS Enterprise Data Warehouse for both current and the target financial years including:

- demographic data as required
- payment type
- partner relationship history
- homeowner status
- disclosed total investments
- disclosed income
- disclosed assets
- disclosed deemed income
- date investments last updated.

Business rules are applied to this data to check if there is a difference in the income reported to DHS compared to the income reported by financial institutions to the ATO.

Where a recipient or spouse is identified as having a difference, the selected case will then be loaded into DHS core systems for compliance action.

Risks

Incorrect identity matches

The ATO uses sophisticated identity matching techniques to ensure they identify the correct taxpayer from data provided by DHS. This technique uses multiple details to obtain an identity match. For example, where a Customer Reference Number (CRN), name, address and date of birth are available all items are used in the identity matching process.

Very high confidence matches will occur where all fields are matched to a taxpayer in ATO systems. Additional manual processes may be undertaken where high confidence identity matches do not occur.

Data quality controls and audit

When compliance action is proposed, additional checks will take place to ensure the correct DHS recipient or spouse has been identified. DHS recipients will be provided with the opportunity to verify the accuracy of the information before any compliance action is taken.

Security and confidentiality

All DHS computer systems are strictly controlled with features including:

- system access controls and security groupings
- login identification codes and password protection
- full audit trails of data files and system accesses.

PROGRAM PROTOCOL

Pay-As-You-Go (PAYG)

Data-Matching

May 2017

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1 DESCRIPTION OF THE PROGRAM PROTOCOL

1.1 Purpose

The purpose of the program protocol is to:

- (i) identify the matching agency and the source agency;
- (ii) detail the direct relationship of the program to the performance of the lawful functions or activities of the matching agency;
- (iii) set out the legal basis for any collection, use or disclosure of personal information involved in the program;
- (iv) outline the objectives of the program, the procedures to be employed, the nature and frequency of the matching covered by the program and the justifications for it;
- (v) explain what methods other than data-matching were available and why they were rejected;
- (vi) detail any cost/benefit analysis or other measures of effectiveness, which were taken into account in deciding to initiate the program;
- (vii) outline the technical controls proposed to ensure data quality, integrity and security in the conduct of the program;
- (viii) provide details of pilot testing of the program;
- (ix) outline the nature of the action proposed to be taken in relation to the results of the program including any letters to be used by the agency involved;
- (x) indicate what form of notice is to be given, or is intended to be given to individuals whose privacy is affected by the program, and
- (xi) specify any time limits on the conduct of the program.

1.2 Requirement for a Program Protocol

The Information Commissioner's on *Guidelines on Data-matching in Australian Government Administration* (guidelines) specify that a program protocol be prepared by agencies conducting certain data-matching programs. These guidelines are voluntary. The Department of Human Services (DHS) and the Australian Taxation Office (ATO) comply with these guidelines.

This initiative is **NOT** part of the program authorised by the *Data-matching Program (Assistance and Tax) Act 1990*.

1.3 Definition of Data-matching

Data-matching is the comparison of two or more sets of data to identify similarities or discrepancies. In the context of this protocol, the term data-matching is used to denote the use of computer techniques to compare data found in two or more computer files to identify cases where there is a risk of incorrect payment.

DHS observes the *Australian Privacy Principles*. Individuals who consider that an agency has interfered with their privacy may complain to the Information Commissioner.

2 DESCRIPTION OF THE MATCHING PROGRAM

2.1 Summary of the program

DHS delivers a range of programs for payments and services on behalf of the Commonwealth. These payments and services are delivered in accordance with Business Partnership Agreements with client departments.

To maintain the integrity of these payments and services, DHS undertakes compliance activities to ensure ongoing entitlement and eligibility.

The Australian Taxation Office (ATO) is responsible for the administration of legislation relating to taxation and excises (excluding customs duties). One part of this responsibility is the Pay-As-You-Go (PAYG) taxation system.

From 1 July 2000 a single PAYG system replaced 11 existing reporting systems, including Pay-As-You-Earn (PAYE), Prescribed Payments System (PPS), provisional tax and the company superannuation fund systems.

PAYG is a single integrated system for reporting and paying withholding amounts and tax on business and investment income. The system brings income tax instalments and withholding tax obligations together in one system, which for most businesses means one set of payment dates and one form to complete.

There are two (2) elements of the system: PAYG instalments and PAYG withholding.

As part of an increased focus on the detection of recipients failing to declare or under declaring income, an initiative has been introduced to match Centrelink recipients with those identified by the ATO as having a PAYG Payment Summary. The data used in the project is sourced from the ATO PAYG data, which is from the PAYG payment summaries electronically lodged by employers with the ATO.

The PAYG data-matching pilot was announced in the 2000-2001 Budget.

The recipient's income details are compared with the income details in their PAYG Payment Summary and, where anomalies are identified between the income declared to DHS and the ATO, the recipient is selected for review.

Depending on the result of the review, further action may be taken, including raising a debt.

The Program Protocol for Pay-As-You-Go (PAYG) Matching was lodged with the Office of the Privacy Commissioner (as it was then) in May 2004.

Since 2004, DHS has continued to exchange payment summary data with the ATO. This exchange is used to identify potential non-compliance through the comparison of information held by the ATO and information payment recipients have reported to DHS.

This program protocol was updated in May 2017 in consultation with the Office of the Australian Information Commissioner (OAIC) to reflect changes to the names of applicable privacy principles and data-matching guidelines; changes to the name of relevant entities, such as Centrelink to DHS; changes to DHS business processes; technological changes; and other minor changes. It should be noted that the data-matching program and the data matching process remains unchanged since 2004. The number of reviews that DHS conducts as a result of its data-matching has increased.

2.2 Objectives

The objectives of this matching program are:

- to achieve savings in program outlays by identifying recipients with undisclosed or incorrectly declared income from employment;
- to deter recipients tempted to fail to disclose income from employment and to promote voluntary compliance through public awareness of the program;
- to recover any moneys which may have been incorrectly paid to those recipients; and
- where appropriate, to undertake prosecution action.

3 AGENCIES INVOLVED

3.1 Source Agencies

The source agencies that supply data for the purposes of this program are:

- Australian Taxation Office (ATO); and
- DHS

DHS is the primary user of this data.

3.2 Matching Agency

The key matching agency involved in this program is the ATO. DHS provides payment recipient files to the ATO for identity matching.

3.3 Data used in matching

DHS supplies its own data relating to all recipients in receipt of an income support payment. See Appendix A for further details.

4 DATA ISSUES

4.1 Data Quality

Poor quality data is of limited value in data-matching. DHS, as the matching agency, verifies the integrity of the data received from the ATO for such things as correct date format and that data is present in all the required fields.

Data quality mechanisms include:

- the ATO only return high confidence match results to DHS;
- DHS seeking validation from the recipient of any PAYG income reported that may impact welfare eligibility; and
- where recipients provide updated or corrected information, DHS takes this into account when determining the type and need for administrative action.

4.2 Data Integrity

DHS and the ATO try to maintain the highest level of data integrity possible. Measures taken to maintain integrity levels include designing systems that will not accept records that are incomplete, and identifying and correcting records that have data items that are inadequate or corrupt.

DHS data, or more specifically those data items used in the matching process, are standardised. Standardisation is the process whereby data items such as name, address and date of birth are converted in such a way as to ensure that these items are consistent across both organisations' files.

4.3 Data Security

The ATO and DHS exchange data using the dedicated mainframe to mainframe Optus Evolve link. This mechanism provides secure and trusted communications across government jurisdictions.

The ATO data received by DHS is held in DHS' secure Teradata and SAP HANA environments. These are core systems that employ strict security controls. Only DHS employees with a business need have access to view the ATO data provided under this program.

DHS staff are subject to existing security controls and confidentiality provisions of the *Social Security (Administration) Act 1999*. Access to the DHS' computer centres is strictly controlled and entry properly authorised. The DHS' security system provides protection and control of dataset access, system entry and program integrity. Security features include logon identification codes, passwords and security groupings to ensure that access to information is on a needs only basis.

The ATO is responsible for its own security with respect to its staff and access to the data provided by DHS. The ATO is subject to existing security controls and subject to the *Privacy Act 1988*, *Crimes Act 1914* and the *Public Service Act 1999*. Access to the ATO's computer systems is limited and is subject to requests for system access which include reminders about privacy and security obligations. Security features include logon identification codes and passwords. All access to systems is monitored and logged.

Existing security arrangements in the department automatically log user access to data files.

Statistics can be produced on the number of records read, number of records matched, number of records unmatched and the number of records written. Audit trails that enable verification of the processing of the data are also in place.

5 THE MATCHING PROCESS

The ATO PAYG data-matching program identifies recipients, who may have income from employment that has not been correctly declared to DHS or anomalies identified with the amount declared and received. People who appear on both the ATO and DHS files are considered to be 'matches'.

The matching process is only undertaken for ATO PAYG records with the same identity details as a recipient. The ATO does the initial identity match against DHS' annual Payment Summary file. DHS does an additional identity match of all ATO PAYG records with recipient records, by comparing the surname, first name, middle initial and date of birth with all DHS records. Where a match is identified, a selection is generated for review.

When a recipient has been matched, and they have a partner who is also a recipient, a review may also be generated for the partner, as any undisclosed income may impact on the partner's entitlement. This process will actually occur during the review selection period. Partner recipient reviews may also be added manually where the relationship is no longer current, but the review process has identified that the partner recipient entitlement would have been impacted during the period of the relationship.

Personal information extracted for use in this data-matching program which does not lead to a match is destroyed by DHS as soon as practicable and within 90 days after the matching occurred. See Appendix A for further detail.

6 ACTION RESULTING FROM THE PROGRAM

At the completion of the matching, selected recipients have a review activity loaded into DHS' core systems for compliance action.

6.1 Employment Income Reviews

The matches produced will be recipients who have income in the following categories:

- Individual Non-business, (i.e. wages or salary).
- A 'Voluntary Agreement'. These are available for individual workers (not employees) who are not required to have tax withheld from their payments at the time of receipt. This applies to certain subcontractors who must have an ABN.
- Labour Hire and other Specified Payments. Labour Hire applies to an individual worker who is:
 - An employee employed through a common law contract.
 - An independent contractor arranged directly.
 - An independent contractor arranged through another entity, such as a company, partnership, or trust.
- Specified Payments refers to those payments that would have been affected under the former Reportable Payments System or Prescribed Payments System.
- Personal Services income and Attributed Income, which is the income of an individual or an entity such as a company, partnership or trust that is mainly a reward for an individual's personal efforts or skills.
- Foreign employment income, which refers to income derived by Australian residents working overseas as an employee. Australian residents are generally taxed on their worldwide income.

Before commencing the reviews, DHS staff check the output of the matching and assess the performance and accuracy of the matching process. For the reviews that commence, the recipient is contacted by letter which provides the recipient the employment information that DHS has received from the ATO and requests them to clarify this information online. A copy of this letter is found in Section 15.

The recipient is given a period of at least 28 days from the date the letter is received in which to clarify or contact DHS in relation to the employment information. Recipients are also advised that a debt may be raised if they do not respond within the required period.

Upon contacting DHS or accessing the online system, the recipient is provided with the opportunity to clarify the information and provide appropriate evidence of their income from employment. Where DHS is satisfied that the information provided by the recipient is sufficient, DHS will apply the information and determine the outcome.

Administrative action may include a:

- debt being raised
- cancellation of entitlement
- reduction in entitlement

Where a recipient does not provide a response within the specified timeframe, DHS makes the determination of appropriate administrative action based on the information provided by the ATO.

7 TIME LIMITS APPLYING TO THE PROGRAM

The matching of ATO PAYG data is conducted annually, and cases released for review.

The ATO now provide two files, one following the completion of the financial year, and an updated file containing PAYG information received by the ATO after the first file.

DHS does not create a permanent register or database on matched or non-matched selections as part of this protocol.

All external data received from the ATO that is no longer required is destroyed in line with Guideline 7 of the Information Commissioner's *Guidelines on Data-matching in Australian Government Administration*.

8 PUBLIC NOTICE OF THE PROGRAM

This data-matching program was notified in the Commonwealth Government Gazette of 12 May 2004.

9 REASONS FOR CONDUCTING THE PROGRAM

9.1 Relationship with the agencies lawful functions

The program is related to DHS' lawful function of limiting payments to those eligible under relevant legislation. The *Social Security Act 1991* and the *Social Security (Administration) Act 1999* provide that recipients are required to be eligible for payment. These requirements are given to recipients in a written advice authorised under different sections of these Acts for different payment types.

9.2 Social Considerations

There are three key social issues associated with the initiative:

- only persons entitled to receive payments from DHS do so at the correct rate;
- the desire of most taxpayers for the income support system to be secure as possible from cheating and fraud; and
- the protection of an individual's right to privacy.

Allied to those issues is a concern for social justice. In particular, there is strong support in the community for an income support system that directs available funds to those most in need of assistance. The program helps to achieve this in two ways:

- by strengthening controls in DHS payment systems it reduces the outlays from DHS programs (this provides funds for the Government to direct to other priorities); and
- the existence of effective controls in payment systems soon becomes evident to the community and rapidly increases voluntary compliance.

Suitable safeguards against unreasonable intrusion into the privacy of individuals are built into the data-matching arrangements. Matching is conducted in accordance with the Information Commissioner's *Guidelines on Data-matching in Australian Government Administration*.

9.3 Voluntary Compliance

The community's compliance with the law increases when it knows that DHS has effective controls in its system to detect incorrect payments and fraud. That is, people claiming or receiving income support payments are more likely to comply voluntarily with the law if they know that:

- there is a high probability that incorrect payments will be detected;
- they will be required to repay any debt; and
- they may be prosecuted if they attempt, by fraud or misrepresentation, to obtain payments to which they are not entitled.

The extent of the voluntary compliance effect flowing from this initiative is difficult to measure and an estimation of the monetary benefits has not been attempted.

10 LEGAL AUTHORITY

10.1 DHS

Section 195 of the *Social Security (Administration) Act 1999* provides that DHS may require the provision of specified information that relates to a class of people. This section authorises DHS to request from the ATO the details of data recorded on the PAYG Payment Summaries of recipients.

Section 192 of the *Social Security (Administration) Act 1999* provides that DHS may require the provision of information of relevance to the assessment of claims for payments that DHS administers, including whether a payment is or was payable to the person who received it or whether the rate is or was correct. Data is provided by the ATO to DHS pursuant to this provision.

In both instances data is requested in accordance with section 196 of the *Social Security (Administration) Act 1999*. Section 196 provides that written notice of the information requirements requested in accordance with both sections 192 and 195 be provided by DHS to the ATO prior to that information being given.

Australian Privacy Principle 6 (APP 6) provides that personal information can be used or disclosed by an agency where that disclosure is required or authorized by or under law. As the ATO information involved in this data-matching program is requested by DHS under sections 192 and 195 of the *Social Security (Administration) Act 1999*, APP 6 does not limit its disclosure to DHS.

10.2 Australian Taxation Office

The ATO is required to comply with formal notices issued under Sections 192 and 195 of the *Social Security (Administration) Act 1999*.

The *Taxation Administration Act 1953* provides for the ATO to disclose information to DHS where the disclosure is for the purpose of administering the social security law.

11 DISCLOSURE OF INFORMATION PROVISIONS

11.1 Australian Taxation Office

The ATO releases sufficient information to DHS to allow matching to be undertaken and to correctly adjust matched recipients payments. The ATO only provides sufficient information to allow DHS to determine the correct entitlement of a recipient. Under the program, DHS provides the actual data received from the ATO to the recipient.

12 ALTERNATIVE METHODS

There are three other data-matching programs used by DHS to detect payment recipients who have failed to declare, or failed to correctly declare, income from employment.

DHS matches information from the ATO to detect non-disclosure by DHS payment recipients of income from employment. This involved matching information taken from recipients' Tax File Number Declaration Form (TDF). However, this matching process does not involve matching TFNs and the ATO does not provide any TFNs to DHS in this process. This matching has been conducted since May 1987. This program relies upon the recipient completing a TDF and the employer lodging the TDF with the ATO. The data is received from the ATO and analysed. Reviews are then initiated and undertaken by compliance officers on a regular basis.

DHS matches information from the Department of Employment (DE) to detect non-disclosure by DHS recipients of income from employment. This program relies upon the recipient either being placed into employment by a provider, or advising a provider that they have commenced employment. This matching uses data provided by DE each calendar month for the previous month.

DHS matches information from the ATO through the Data-matching Program. This program relies on the recipient lodging an Income Tax Return with the ATO and declaring income from employment as a source of income. This matching works on previous financial year data. The Data-matching Program is conducted up to nine times a year.

Other methods available to DHS are voluntary compliance, public denunciation, random manual reviews and Industry reviews. Analysis has shown that these methods are time consuming and labour-intensive.

The program of matching Payment Summary records from ATO seeks to complement these programs by detecting those recipients who may not have been detected by the above-mentioned methods, or who may have incorrectly/under declared earnings during their entitlement, therefore identifying recipients at risk of incorrect payment.

13 PRIOR PROGRAMS AND PILOT PROGRAMS

The PAYG data-matching pilot was announced in the 2000-2001 Budget.

The first phase of the pilot was conducted in 2000-2001, commencing in December 2001, and ending in June 2002. Phase II of the project commenced in December 2002, and was completed in June 2003.

The reviews were conducted in centralised teams in Area South Metro and Area North Central Victoria, for Phase I, and solely by Area South Metro for Phase II of the pilot.

The project met or exceeded the measures set down in the Budget estimates for debts raised and overall savings.

DHS and the ATO have been working in partnership to conduct data-matching for more than

two decades. Since 1991, DHS has undertaken employment income matching activities involving the matching of TFNs under the DMP Act. Those activities have been conducted in accordance with the DMP Act and the DMP Guidelines. An initial two year PAYG Data-matching pilot was commenced in 2001. Ongoing PAYG Data-matching has been in operation since 2004.

14 COSTS AND BENEFITS

This section details the costs and benefits for this program that were taken into account in deciding to initiate the program.

As announced in the 2015-16 Budget, and the 2015-16 and 2016-17 Mid-Year Economic Financial Outlook, the Employment Income Matching (EIM) program which uses PAYG matching, is expected to return over \$4.6 billion in savings over 5 years. It is anticipated that these savings will be delivered as a result of the department's ability to undertake additional compliance reviews.

In addition to the quantitative benefits, the EIM program will allow DHS to address more non-compliance with recipients. Over time this will lead to more preventative approaches and increase voluntary compliance and reduce debt.

Appendix A – Technical Standards report

A. Description of Data

The following data items to be provided to the ATO by DHS for identity matching purposes.

- Customer Reference Number
- Gender
- Name
- Date of Birth
- Address

Table 1 – Centrelink Identity File

Data item	Description
REF-NUMBER	Customer Reference Number
GENDER	Gender
SRNM	Surname
1 ST -NM	First Name
OTHR-GVN-NM	Other Given Name
BRTH-YR	Year of Birth
BRTH-MTH	Month of Birth
BRTH-DAY	Day of Birth
ADDR-LN-1	Address Line 1
ADDR-LN-2	Address Line 2
LCLTY-NM	Locality
POST-CD	Post Code
STATE-CD	State Code

The following data items are provided to DHS by the ATO.

- ‘Pay As You Go’ Payment Summary – Payer Record
- ‘Pay As You Go’ Payment Summary – Payee Record

Table 2 – PAYG Payment Summary Table – Payer Table

Field name	Description
Record length	Indicates the length of the record.
Record Type	Indicates this record is a Payer record.
Payer Australian Business Number or Withholding Payer Number	The ABN is an 11 digit number. The WPN is a 9 digit number
Payer Branch Number	Payer Branch Number
Financial year (CCYY)	Financial year (CCYY)
Payer name	Payer name
Payer trading name	Payer trading name
Payer address – line 1	Payer address – line 1
Payer address – line 2	Payer address – line 2
Suburb, town or city	Suburb, town or city
State or territory	State or territory
Postcode	Postcode
Country	Country
Contact name	Contact name
Contact telephone number	Contact telephone number
Contact facsimile number	Contact facsimile number
ETP payer type	Superannuation payer or Other ETP Payer
ANZSIC Code	ANZSIC Code

- Table 3 – Payment Summary Output File Table – Payee Table**

Field name	Description
Record length	Indicates the length of the record.
Record Type	Indicates this record is a Payee record
Payment Summary Record Type	Type of Payment Summary
Client reference number	Client reference number
Payee Australian Business Number	If blank or 0 then R02_PYE_M_TFN_ABN
Payee date of birth (DDMMCCYY)	Format to DDMMCCYY
Payee surname	Payee surname
Payee first given name	Payee first given name
Payee second given name	Payee second given name
Payee address – line 1	Payee address – line 1
Payee address – line 2	Payee address – line 2
Payee suburb, town or city	Payee suburb, town or city
Payee state or territory	Payee state or territory
Payee postcode	Payee postcode
Payee country	Payee country
Period of payment start date (DDMMCCYY)	Format as DDMMCCYY
Period of payment end date (DDMMCCYY)	Format as DDMMCCYY
LAB Payment type	This attribute is only used for the LAB record.

Field name	Description
Withholding rate	The rate at which tax was withheld. The withholding rate is stored as five characters to two decimal points, e.g. 04850 = 48.5%
Total tax withheld (dollars)	Total tax withheld (dollars)
Gross payments (dollars)	Gross payments (dollars)
Total allowances (dollars)	This attribute is only used for the INB record.
Lump sum payment A (dollars)	This attribute is only used for the INB record or FEI record
Lump sum payment B (dollars)	This attribute is only used for the INB record.
Lump sum payment D (dollars)	This attribute is only used for the INB record or FEI record
Lump sum payment E (dollars)	This attribute is only used for the INB record or FEI record
Community Development Employment Project (dollars)	This attribute is only used for the INB record.
Other income (dollars)	This attribute is only used for the INB or DSP records.
Reportable fringe benefits (dollars)	This attribute is only used for the INB record or FEI record
Income type	This attribute is only used for the INB record. Values are: S = salary & wages P = Pension
Number of calendar days in eligible service period before 1 July 1983	This attribute is only used for the ETP or ETS records.
Number of calendar days in eligible service period after 30 June 1983	This attribute is only used for the ETP or ETS records.
CGT exempt component (dollars)	This attribute is only used for the ETP or ETS records.
Non-qualifying component (dollars)	This attribute is only used for the ETP or ETS records.
Undeducted contributions (dollars)	This attribute is only used for the ETP, ETS or DSP records.
Concessional component (dollars)	This attribute is only used for the ETP or ETS records.
Pre July 1983 component (dollars)	This attribute is only used for the ETP or ETS records.
Post June 1983 untaxed element (dollars)	This attribute is only used for the ETP, ETS or DSP records.
Post June 1983 taxed element (dollars)	This attribute is only used for the ETP or ETS records.
Post June 1994 invalidity component (dollars)	This attribute is only used for the ETP or ETS records.
Assessable amount (dollars)	This attribute is only used for the ETP or ETS records.
Taxed component taxable amount	The reported amount of taxable superannuation that has been taxed
Total taxable amount	The reported amount of total taxable superannuation

Field name	Description
Untaxable component taxable lump sum amount	The reported amount of a lump sum in arrears that is taxable and has not been taxed
Taxable component taxable lump sum amount	The reported amount of lump sum in arrears that is taxable and has been taxed
Tax offset amount	The reported amount of superannuation tax that has been offset
Transitional termination payment code	Reported value indicating whether the amount on a 'DEMP' report is a transitional termination payment
Related prior payment code	Reported value indicating whether the amount on a 'DEMP' report is related to a prior termination payment
Amendment resolution code	The derived resolution of an attempted amendment
Amendment code	Amendment code as reported
Death benefit (=Y or N)	This attribute is only used for the ETP, EMP or SLS records.
Type of death benefit (=T or O)	This attribute is only used for the ETP, EMP or SLS records.
Payer Australian Business Number or Withholding Payer Number	The ABN is an 11 digit number. The WPN is a 9 digit number
Payer Branch Number	Payer Branch Number
Payee sex	Sex code of the client
Compromised TFN	The status of the matched TFN if compromised, else blank
TFN quoted ind	TFN quoted indicator
Payee match resolution code	Match resolution code
Filler	

B. Matching Techniques

Identify Matching

The identity data-matching of the two information sources is conducted by the ATO.

The output of this matching is provided to DHS as the 'matched' records.

DHS target recipients where there is a discrepancy between income declared to the ATO and income declared to DHS.

This could be –

- A) Recipient and Spouse
- B) Spouse but not recipient
- C) Recipient but not spouse

How DHS detect the discrepancy depends on the information gathered. DHS may have to use different business rules to obtain an accurate and valid result.

Income Matching

Information is extracted from the DHS Enterprise Data Warehouse for both current and the target financial years including:

- declared earnings
- compensation payments
- other government payments
- business, real estate or other income and / or payments
- partner relationship history
- student course history
- income support payment and debt history
- demographic data as required

Business rules are applied to this data to check if there is a difference in the income reported to DHS compared to the income reported by employers to the ATO.

Where a recipient or spouse is identified as having a difference, the selected case will then be loaded into DHS core systems for compliance action.

C. Risks

Incorrect identity matches

The ATO uses sophisticated identity matching techniques to ensure they identify the correct taxpayer from data provide by DHS. This technique uses multiple details to obtain an identity match. For example, where a Customer Reference Number (CRN), name, address and date of birth are available all items are used in the identity matching process.

Very high confidence matches will occur where all fields are matched to a taxpayer in ATO systems. Additional manual processes may be undertaken where high confidence identity matches do not occur.

D. Data quality controls and audit

When compliance action is proposed, additional checks will take place to ensure the correct DHS recipient or spouse has been identified. DHS recipients will be provided with the opportunity to verify the accuracy of the information before any compliance action is taken.

E. Security and confidentiality

All DHS computer systems are strictly controlled with features including:

- system access controls and security groupings
- login identification codes and password protection
- full audit trails of data files and system accesses

Appendix B – Initial Contact Letter

If not delivered: Locked Bag 8900 CANBERRA ACT 2601

{RETURNADDRESSBARCODE}

Customer Reference Number: {REFERENCE.NUMBER}

**Australian Government**

Department of Human Services

centrelink

 <{NOMINEE.TITLE.FULLNAME}
 {NOMINEE.POSTAL.ADDRESS}
 {NOMINEE.POSTAL.ADDRESS}

!

 {CLIENT.TITLE.FULLNAME}
 {CLIENT.POST.ADD}
 {CLIENT.POST.ADD}
 {CLIENT.POST.ADD}>

 {PRINT.DATE}

<APPLY EXISTING NOMINEE RULE: This is a copy of the letter we have sent to {CLIENT.FULLNAME} for whom you are the nominee. | This letter provides information about {CLIENT.FULLNAME} for whom you are the nominee. | >

Dear {CLIENT.TITLE.SURNAME}

Employment income confirmation

We have information from the Australian Taxation Office (ATO) that we need your help to confirm or update. The employment dates or income details are different to what you told us when getting a payment. We use your employment information so you get paid the right payment.

This is not a debt letter. Please check the ATO information with this letter carefully.

You must confirm or update the information **within 28 days** of receiving this letter.

Go online and check today

The easiest way is to sign in to your Centrelink online account linked to your **myGov** account.

You can also go to humanservices.gov.au/confirmincome and register:

1. Enter the reference number at the top of this letter and your confirmation code: **{CODE}**.
The confirmation code will expire after 28 days.

2. Enter details from your current Australian driver licence or passport, and your Medicare card.
3. Provide an email address or mobile number so we can send you a security code to log on.

Please note, if you don't confirm or update the information within 28 days, we may apply the employment dates and income from the ATO to your record. This may result in a debt you will need to repay.

After you have confirmed or updated the details, we will write to you to let you know the outcome and what you need to do next.

If you need help

If you don't have internet access or need help to sign in, go into any of our service centres. If you need help with the employment information provided, call us on 1800 086 400.

Yours sincerely

Director, Earned Income
Customer Compliance

Employment information statement

Check this employment information from the Australian Taxation Office against your records. Make sure you check the dates you worked for each employer.

Go to humanservices.gov.au/confirmincome to confirm or update these details. You may need payslips or bank statements to check this information.

Employer	Super Sparkle Cleaning
Dates of Employment	10 JUL 2015 to 13 AUL 2015
Earnings	\$400.00
Employer	Joe Bloggs Tree Cutting
Dates of Employment	5 DEC 2015 - 20 FEB 2016
Earnings	\$3,255.00
Employer	Glassy Clothes
Dates of Employment	15 MAR 2016 to 22 APR 2016
Earnings	\$1022.00

Your Customer Reference Number is **{REFERENCE.NUMBER}**

If you do not agree with a decision we have made

- Contact us so we can check the details and explain the decision.
- Contact us and ask for a review of the decision. We will change it if it is wrong.
- Contact the Administrative Appeals Tribunal (AAT) if you do not agree with the review officer's decision.
- If you do not agree with the decision of the AAT you may be able to appeal further. For more information about the AAT, please go to aat.gov.au

All of the above are free of charge.

There is no time limit for a review of a decision about money you owe us. You can choose to pay back the money while the decision is being reviewed.

Privacy and your personal information

Your personal information is protected by law (including the *Privacy Act 1988*) and is collected by the Australian Government Department of Human Services for the assessment and administration of payments and services.

Your information may be used by the department, or given to other parties where you have agreed to that, or where it is required or authorised by law (including for the purpose of research or conducting investigations).

You can get more information about the way in which the department will manage your personal information, including our privacy policy, at humanservices.gov.au/privacy

Data-matching initiatives

The Department of Human Services undertakes regular data-matching activities in line with the Data-matching Program (Assistance and Tax) Act 1990 and the Office of the Australian Information Commissioner's Guidelines on Data-matching in Australian Government Administration and social security law.

This includes matching with the:

- Australian Securities and Investments Commission
- Australian Taxation Office
- ComSuper
- Department of Employment
- Department of Health
- Department of Social Services
- Department of Immigration and Border Protection
- Defence Housing Authority
- Department of Corrective Services in each state and territory
- Registrar of Births, Deaths and Marriages in each state and territory
- Public and Private education providers in each state and territory.

If you need help

If you need help or you do not have internet access, you can go to any of our service centres. You can also call us directly on 1800 086 400.

To give us feedback or make a complaint

We aim to resolve your concerns as quickly as possible. If you want to make a complaint or give us feedback you can:

- call our feedback and complaints line on **1800 132 468**, or
- go to humanservices.gov.au/feedback for other options.

If we are not able to resolve your complaint to your satisfaction, you can contact the Commonwealth Ombudsman by going to their website ombudsman.gov.au or calling them on **1300 362 072**.

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Australian Government
Department of Human Services

Referral for Anomalies and Mismatches for Compliance Interventions 110-13060070

Currently published version valid from 25/01/2019 12:27 amundefined

For staff conducting Customer Compliance Division Interventions only

This document outlines how to determine if an anomaly or mismatch has occurred when completing a customer compliance intervention and the steps involved in actioning the intervention for both the Compliance Officer (CO) and Quality Development Officer (QDO).

Note: anomalies and mismatches for **Employment Income Matching (EIM) Interventions** is not included in this file. See the [Resources](#) page for a link to Anomalies and mismatches - Employment Income Matching (EIM) Interventions.

Determining if an anomaly or mismatch has occurred

If during a compliance intervention conversation with a customer a discrepancy is identified between the customer details in the match data and that stated by the customer, further investigation is required.

All anomalies and mismatches are referred to a Quality Development Officer (QDO) for vetting prior to escalation to the Customer Compliance Division Service Desk. The QDO will determine if the referral meets the anomalies and mismatch referral criteria.

The [Resources](#) page contains a list of annotations used in the procedure and links to the anomalies and mismatches process for EIM Interventions, the Business imperatives Intranet page and the Customer Compliance Division Service Desk Online Query Form.

Related links

[Initiation and customer contact for Earned Income Interventions \(Mail based\) \(EIMM\)](#)

[Initiation and customer contact for Earned Income Interventions \(Phone based\) \(EIIP\)](#)

[Initiation and customer contact for Unearned Income Interventions \(UII\)](#)

undefined

For staff conducting Customer Compliance Division Interventions only

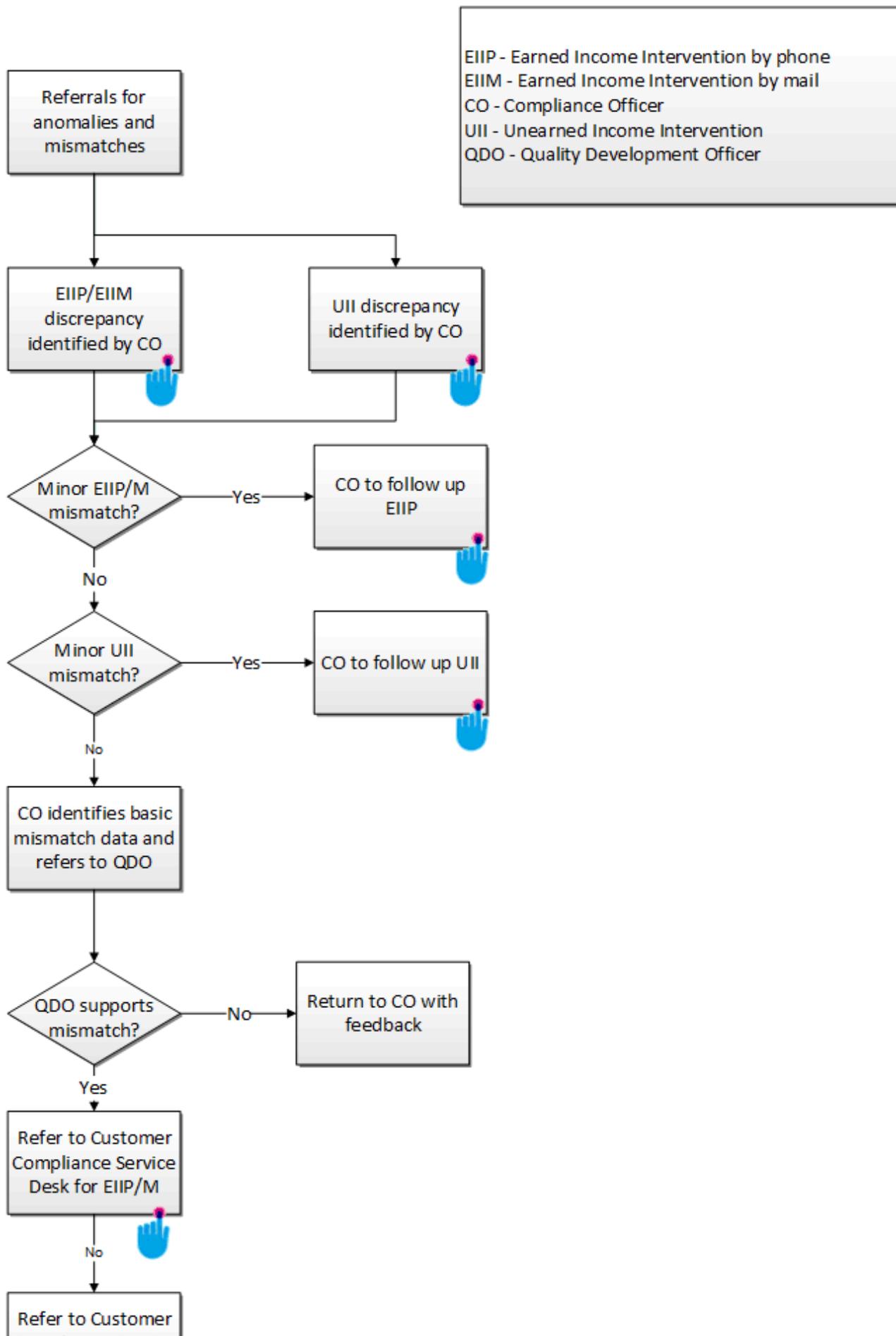
This page contains information on how to determine if an anomaly or mismatch has occurred during customer compliance interventions.

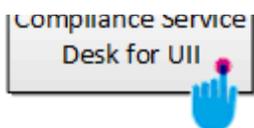
Flowchart

Anomalies and mismatches

This image provides a summary of how to determine if an anomaly or mismatch has occurred during a customer compliance intervention.

Note: [a text based version of the following process summary image is available.](#)





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For staff conducting Customer Compliance Division Interventions only

This page contains information on how to determine if an anomaly or mismatch has occurred during customer compliance interventions.

On this Page:

[Anomalies and mismatches - EIP and EIM](#)

[Anomalies and mismatches - UII](#)

Anomalies and mismatches - EIP and EIM

Action required for anomalies and mismatches - EIP and EIM

Table 1: This table describes how to determine if an anomaly or mismatch has occurred during an Earned Income Intervention (Phone based) (EIP) and (Mail-based) (EIM) and the steps involved in actioning the intervention for both the Compliance Officer (CO) and Quality Development Officer (QDO).

Step	Action
1	<p>Anomaly or mismatch referral + Read more ...</p> <p>If during the conversation with the customer a discrepancy is identified between the customer details in the match data and that stated by the customer, further investigation is required.</p> <p>The match data is then referred to a QDO for further investigation.</p> <p>Note: where multiple match data events exist for an intervention, action anomaly/mismatch for match data only, remaining matches should be continued.</p> <ul style="list-style-type: none"> • CO action for: <ul style="list-style-type: none"> ◦ Tax File Declaration Form (TDF) mismatches, go to Step 2 ◦ Pay As You Go (PAYG) mismatches, go to Step 5 • QDO actions, go to Step 7
2	<p>Tax File Number Declaration Form (TDF) mismatches + Read more ...</p> <p>TDF matches are loaded with an Alias Match field indicator. These Alias Match field indicators are:</p> <ul style="list-style-type: none"> • 'T' (match made on the Tax File Number (TFN) and the customer's surname) • 'Y' (match made on a customer's alias name) • 'N' (match made on a customer's legal name) <p>To determine the alias value of the match select the intervention in the Integrated Review System (IRS) and navigate to the TDF match data on the Match Data (IRMD) screen.</p> <p>If the Alias field on the Match Data (IRMD) screen has a:</p> <ul style="list-style-type: none"> • 'T' value match, go to Step 3 • 'Y' or 'N' match, go to Step 4
3	<p>'T' (Match made on the Tax File Number (TFN) and the customer's surname) + Read more ...</p>

	<p>Check the customer's identity details against the ATO identity details listed on the TDF match data. Determine if the ATO identity details of the person listed are the same as the customer's.</p> <p>If required, also check for any alias details on Customer Personal Details Summary (CPDS) screen.</p> <p>Look for a logical link between the identity details, for example, parent/child, or other family relation for example, same names, different date of birth, where an individual could have picked up another person's TFN and started using it unknowingly.</p> <p>These cases may easily be identified through discussion with the customer (without identifying the particulars of the ATO identity details) by asking questions about the possibility of other family members having access to their TFN.</p> <p>Has a 'T' mismatch been identified?</p> <ul style="list-style-type: none"> • Yes, if it is clear that the TFN has been compromised customers can resolve these issues themselves. They must be advised to contact the Australian Taxation Office (ATO) to discuss their circumstances. The customer should be advised to visit the ATO website for more information • No, <ul style="list-style-type: none"> ◦ for EIP see the 'Customer contact via the Out bound dialler or request to contact letter' table in Initiation and customer contact for Earned Income Interventions (Phone based) (EIP) ◦ for EIIM see the 'Employment circumstances that need to be discussed/investigated' table in Initiation and customer contact for Earned Income Interventions (Mail based) (EIIM) <p>Procedure ends here.</p>
4	<p>'Y' or 'N' Match made on a customer's alias or legal name + Read more ...</p> <p>Check the customer's identity details against the ATO identity details listed on the TDF match data.</p> <p>Has a 'Y' or 'N' mismatch been identified?</p> <ul style="list-style-type: none"> • Yes, if it is clear that the customer is not the person who signed the Tax File Number Declaration Form (TDF), advise the customer that the details do not match and this will be investigated. Go to Step 6 • No, <ul style="list-style-type: none"> ◦ for EIP see the 'Customer contact via the Out bound dialler or request to contact letter' table in Initiation and customer contact for Earned Income Interventions (Phone based) (EIP) ◦ for EIIM see the 'Employment circumstances that need to be discussed/investigated' table in Initiation and customer contact for Earned Income Interventions (Mail based) (EIIM) ◦ procedure ends here
5	<p>PAYG mismatches + Read more ...</p> <p>Once a CO has performed a review of the customer's record, they are required to determine whether the match data received is linked to the customer.</p> <p>What does not constitute a mismatch?</p> <p>If a CO has been able to identify at least two commonalities at the initial stages (for example name and date of birth matches or name and address matches) between the customer and the match data, then it could be determined that the match data is not a mismatch and should be continued.</p> <p>Note: alternative spelling or misspelling of a customer's name does not automatically constitute a 'mismatch'.</p> <p>If a CO is not able to establish links between the customer and the PAYG match data advise the customer that the details do not match and this will be investigated.</p> <p>Has a PAYG mismatch been identified?</p>

	<ul style="list-style-type: none"> • Yes, go to Step 6 • No, <ul style="list-style-type: none"> ◦ for EIIP see the 'Customer contact via the Out bound dialler or request to contact letter' table in Initiation and customer contact for Earned Income Interventions (Phone based) (EIIP) ◦ for EIIM see the 'Employment circumstances that need to be discussed/investigated' table in Initiation and customer contact for Earned Income Interventions (Mail based) (EIIM) ◦ procedure ends here
6	<p>CO actions for anomalies and mismatches + Read more ...</p> <p>If the customer has current (unverified) employment; take the opportunity to:</p> <ul style="list-style-type: none"> • offer the customer the customer service business imperatives, see the Resources page for a link • deliver appropriate educational message • annotate the intervention DOC to reflect all of the following: <ul style="list-style-type: none"> • the match data is inconsistent with the customer record • provide details of discrepancies and checks performed • that the source data match has been referred to a QDO (if there are multiple source data matches provide details of which match is inconsistent) • add keyword 'AMMEIIX' (where X is the CO side code) on the Manage Reviews (IRMR) screen <p>Procedure ends here.</p>
7	<p>For Quality Development Officer only + Read more ...</p> <p>Mismatches are key worded for QDO escalation by the investigating CO.</p> <p>These can be located by undertaking an IRNS search using the keyword 'AMMEIIX' (where X is the site code).</p> <p>Site QDOs are to investigate each mismatch to verify the validity of the referral.</p> <p>Where the mismatch referral is not supported the QDO is required to:</p> <ul style="list-style-type: none"> • delete the keyword 'AMMEIIX' • return the referral to the CO with feedback explaining the referral error <p>Where the mismatch referral is supported the QDO is required to:</p> <ul style="list-style-type: none"> • remove keyword 'AMMEIIX' (where X is the site code) from IRMR • add keyword 'AMMYES' • refer the intervention to the Customer Compliance Service Desk if appropriate <p>Note: where TDF or PAYG match data has been investigated, and a mismatch exists between the information provided by the ATO and that provided by the customer and/or employer, the case should be referred to the Customer Compliance Service Desk.</p> <p>Does the mismatch need to be referred to the Customer Compliance Desk?</p> <ul style="list-style-type: none"> • Yes, go to Step 8 • No, procedure ends here
8	<p>Referral to the Customer Compliance Desk TDF and PAYG mismatches + Read more ...</p> <p>The following information is to be forwarded to the Customer Compliance Service Desk via the Customer Compliance Service Desk Online Form. See the Resources page for a link.</p> <p>Information to include in the referral:</p> <ul style="list-style-type: none"> • the Customer Reference Number (CRN) • the employer's name/details

	<ul style="list-style-type: none"> • TDF signed date or the PAYG financial year (whichever is applicable) • details of the mismatch • any additional comments that may assist the service desk in their assessment of the review <p>Procedure ends here.</p>
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Anomalies and mismatches - UII

Action required for anomalies and mismatches - UII

Table 2: This table describes how to determine if an anomaly or mismatch has occurred during an Unearned Income Intervention (UII) and the steps involved in actioning the intervention for both the Compliance Officer (CO) and Quality Development Officer (QDO).

Step	Action
1	<p>Anomaly or mismatch referral + Read more ...</p> <p>If during the conversation with the customer a discrepancy is identified between the customer details in the match data and that stated by the customer, further investigation is required.</p> <p>The match data is then referred to a QDO for further investigation.</p> <p>Note: where multiple match data events exist for an intervention, action anomaly/mismatch for match data only. Remaining matches should be continued.</p> <ul style="list-style-type: none"> • CO action go to Step 2 • QDO actions, go to Step 4
2	<p>UII anomaly or mismatch referrals + Read more ...</p> <p>Tight matching processes ensure that incorrect matches are unlikely, however a mismatch (i.e. where the selection relates to two different people) can occur if:</p> <ul style="list-style-type: none"> • an error has occurred in data entry on the customer's record e.g. address is not recorded correctly • customer may have similar surname and/or date of birth <p>The following checks should be undertaken:</p> <ul style="list-style-type: none"> • Check the Customer Personal Details Summary (CPDS) screen for alternative names • Check Link Summary (LS) screen and Child Selection (CHS) screen for possible parents/children • Check Document List (DL) screen for any DOCs, Display on Access (DOA) or otherwise, recording the use of alternative names for employment and/or other purposes • Check Address History (ADH) screen and the On Line Search (OLS) facility to determine if the customer lived at that address or in that zone in the match year <p>Has a UII mismatch been identified?</p> <ul style="list-style-type: none"> • Yes, go to Step 3 • No, see the 'Locate and assess the intervention compliance trigger' table in Initiation and customer contact for Unearned Income Interventions (UII). Procedure ends here
3	<p>CO actions for anomalies and mismatches + Read more ...</p> <p>Take the opportunity to:</p> <ul style="list-style-type: none"> • offer the customer the customer service business imperatives, see the Resources page for a link • deliver appropriate educational message • annotate the intervention DOC to reflect that:

	<ul style="list-style-type: none"> ◦ The match data is inconsistent with the customer record, and ◦ Provide details of discrepancies and checks performed, and ◦ That the source data match has been referred to a QDO (if there are multiple source data matches provide details of which match is inconsistent) <ul style="list-style-type: none"> • Add the keyword AMM_XXX (where X is the CO site code) on the Manage Reviews (IRMR) screen <p>For QDO actions, go to Step 4.</p> <p>CO action, procedure ends here.</p>
4	<p>Quality Development Officer (QDO) actions for anomalies/mismatches: + Read more ...</p> <p>Anomalies and mismatches are key worded for QDO escalation by the investigating CO.</p> <p>These can be located by undertaking an IRNS search using the keyword AMM_XXX (where X is the site code).</p> <p>Site QDOs are to investigate each anomaly/mismatch to verify the validity of the referral.</p> <p>Where the anomaly/mismatch referral is not supported the QDO is required to:</p> <ul style="list-style-type: none"> • delete the keyword AMM_XXX • return the referral to the CO with feedback explaining the referral error <p>Where the mismatch referral is supported the QDO is required to:</p> <ul style="list-style-type: none"> • remove keyword AMM_XXX (where X is the site code) from IRMR • add keyword AMMYES • refer the intervention to the Customer Compliance Service Desk <p>Note: where multiple match data events exist for an intervention, action anomaly/mismatch for match data only. The remaining matches should be continued.</p> <p>Does the mismatch need to be referred to the Customer Compliance Desk?</p> <ul style="list-style-type: none"> • Yes, go to Step 5 • No, procedure ends here
5	<p>Referral to the Customer Compliance Desk UII mismatches + Read more ...</p> <p>The following information is to be forwarded to the Customer Compliance Service Desk via the Customer Compliance Service Desk Online Form. See the Resources page for a link.</p> <p>Information to include in the referral:</p> <ul style="list-style-type: none"> • the Customer Reference Number (CRN) • details of the mismatch • any additional comments that may assist the service desk in their assessment of the review

undefined

For staff conducting Customer Compliance Division Interventions only

This page contains links to policy and legislation.

Policy

[Guidelines for the Conduct of the Data Matching Program](#)

[Australian Privacy Principles](#)

[Guides on Data Matching in Australian Government Administration](#)

Legislation

Links to the Federal Register of Legislation site point to a 'Series' page which lists all available historical versions. Navigate to the appropriate legislative reference(s) listed below by selecting the 'Latest' compilation at the top of the list.

[Privacy Act 1988](#)

Resources

For staff conducting Customer Compliance Division Interventions only

This page contains a link to the Australian Taxation Office (ATO) contact details, a list of annotations used in the procedure and links to the anomalies and mismatches procedure for Employment Income Matching (EIM) Interventions, the Business imperative Intranet page and the Customer Compliance Division Service Desk Online Query Form.

On this Page:

Contact details

[Australian Taxation Office \(ATO\)](#)

Online Query Form

[Customer Compliance Division Service Desk Online Query Form](#)

Intranet link

[Business Imperatives](#)

Anomalies and mismatches - EIM Interventions

This attachment may not be printed, broadcast or released externally. For contact details and more information, see [Information Publication Scheme](#).



[Anomalies and mismatches - Employment Income Matching \(EIM\) Interventions](#)

Annotations used in this procedure

Below is a list of annotations used in this procedure.

[Delivering the education message - Unearned Income Interventions \(UII\)](#)

[Delivering the education message - Earned Income Interventions \(EII\)](#)

[Site code](#)

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Australian Government

Department of Human Services

Customer support for EIC online compliance interventions 110-13090010

Currently published version valid from 22/11/2019 3:31 pmundefined

s 22

Anomaly or mismatch

Where the customer indicates in the intervention that they did not work for an employer identified in the EIC match, an assessment will be required to validate whether an anomaly or mismatch has occurred.

s 22

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[Possible anomaly or mismatch has been identified](#)

s 22

Possible anomaly or mismatch has been identified

Table 3

Step	Action
1	<p>Customer contact + Read more ...</p> <p>COs must adhere to the department's telephone standards when interacting with customers by telephone.</p> <p>Before releasing any information, it is imperative that the customer is authenticated as the person to whom the information relates to or a person the customer has authorised to receive the information. See Authenticating a customer.</p> <p>This must include checking the customer's current address and telephone number. When it is established that a customer's address or telephone number must be updated, then all current addresses (including postal address) and telephone details (including mobile phone numbers) must be checked and updated via the Change in Contact Details workflow.</p> <p>If the customer has notified of a bereavement event, the CO can apply a 28 day extension to allow the customer more time. It is considered that at these times the customer requires additional adjustment time before responding to the intervention.</p> <p>If the customer has an interpreter indicator and an interpreter is required, refer to Offering an Interpreter and Booking an Interpreter and ensure the interaction and action taken regarding engaging the services of an interpreter are recorded.</p>
2	<p>Viewing the EIC intervention in Customer First + Read more ...</p> <p>In Customer First:</p> <ul style="list-style-type: none"> • Select the CRN/BP hyperlink • The Customer Details screen will display • Scroll down and select Interaction History <p>The integrated review will have a status of For Manual Action.</p> <p>Select the hyperlink then the Note tab to display the information regarding the manual handoff.</p>
3	<p>Customer conversation + Read more ...</p> <p>Discuss with the customer which employer they did not work for and why.</p> <p>Ask the customer if they reviewed the trading names listed for the employer/s or use the ABN lookup guide to identify other trading names.</p> <p>Did the customer check the ABN lookup guide?</p>

	<ul style="list-style-type: none"> • Yes, go to Step 4 • No, conduct an ABN search and discuss with the customer, then go to Step 4
4	<p>Review the customer record + Read more ...</p> <p>If the customer indicates that, they did not work for one or more of the match employers, and were unable to confirm employer details by searching the ABN Lookup.</p> <p>Thoroughly review the customer record and determine if the anomaly or mismatch can be clearly identified.</p> <p>Ask the customer, 'Would you mind holding the line while I check your record?'</p> <p>Then check the:</p> <ul style="list-style-type: none"> • Customer Personal Details Summary (CPDS) screen for alternative names • Link Summary (LS) screen and Child Selection (CHS) screen for possible parents/children • Document List (DL) screen for any DOCs, Display on Access (DOA) or otherwise, recording the use of alternative names for employment and/or other purposes • Address History (ADH) screen and the On Line Search (OLS) facility to determine if the customer lived at that address or zone in the match year <p>Preliminary assessment</p> <p>COs must ensure they use all information available to determine if an anomaly or mismatch exists between the customer and match data.</p> <p>If at least 2 commonalities can be identified (for example, name and date of birth matches, or name and address matches) between the customer and match data, it can be determined that the match data is not a mismatch and should be continued.</p> <p>Alternative spelling or misspelling of a customer's name does not automatically constitute a mismatch. Take extra care in the case of twins and intertwined records.</p> <p>Can an anomaly or mismatch be identified from the customer record?</p> <ul style="list-style-type: none"> • Yes, go to Step 5 • No, go to Step 6
5	<p>Anomaly or mismatch conversation + Read more ...</p> <p>Run the Anomaly Mismatch guided procedure during the conversation with the customer. This will allow the anomaly or mismatch to be confirmed or denied for each employer.</p> <p>Thank the customer for holding. Discuss the reasons the customer indicated they did not work for an employer.</p> <p>Using all the information available, determine if an anomaly or mismatch exists with the employer(s) indicated.</p> <p>Has an anomaly or mismatch been identified?</p> <ul style="list-style-type: none"> • Yes, go to Step 7 • No, go to Step 6
6	<p>Anomaly or mismatch denied + Read more ...</p> <p>If unable to validate that an anomaly or mismatch has occurred for any of the employers listed in the intervention, update via the Anomaly Mismatch guided procedure:</p> <ul style="list-style-type: none"> • Select Deny from the Confirm Mismatch column • Document the details in the Actions performed during the investigation field • Select Next to review the information

	<ul style="list-style-type: none"> • Advise the customer of the review completion date • Click Finish to finalise the guided procedure • Select Save on the Integrated Review (PAYG Compliance Intervention) <p>Finalising the guided procedure will change the Integrated Review (PAYG Online Compliance Intervention) status back to Open and enable the customer to continue their Employment Income Confirmation online.</p> <p>The guided procedure will insert a Note in the Integrated Review (PAYG Online Compliance Intervention), detailing the actions taken.</p>
7	<p>Anomaly or mismatch confirmed + Read more ...</p> <p>If it is determined that an anomaly or mismatch may have occurred:</p> <ul style="list-style-type: none"> • Advise the customer that further investigation will have to occur and that someone will contact them to advise the outcome and next steps • Advise the customer that if they cannot be contacted, they will need to contact 1800 086 400 to complete their Employment Income Confirmation within 14 days. If they fail to contact within 14 days, we may apply the ATO information to their record and this may result in debt <p>Update the Anomaly Mismatch guided procedure:</p> <ul style="list-style-type: none"> • Select Confirm from the Confirm Mismatch column • Document the details, including evidence found to confirm the anomaly/mismatch in the Actions performed during the investigation field • Select Next to review the information • Select Save & Exit • Select Save on the Integrated Review (PAYG Compliance Intervention) for referral to Case Selection, Planning and Engagement to occur <p>The guided procedure will generate a Note on the Integrated Review (PAYG Online Compliance Intervention) detailing the actions taken, and refer the case to Case Selection, Planning and Engagement for further investigation.</p>
8	<p>Anomaly or mismatch has been investigated by Case Selection, Planning and Engagement + Read more ...</p> <p>When the anomaly or mismatch has been investigated by Case Selection, Planning and Engagement the WMS work item will be allocated to a Compliance Officer to contact the customer to advise the outcome.</p> <p>Use Desktop Electronic Messaging Capability (DEMC) before the call attempts, see the Sending a Desktop Electronic message to a customer table on the Electronic Messaging (EM) tab of Centrelink letters online and Electronic Messaging.</p> <p>Make 2 genuine attempts to contact the customer on all available numbers.</p> <p>Record all attempts to contact the customer under the Note tab.</p> <p>COs must:</p> <ul style="list-style-type: none"> • adhere to the departments telephone standards when interacting with customers by telephone • inform the customer at the beginning of the call, that the call may be recorded for quality assurance and training purposes <ul style="list-style-type: none"> ◦ 'Before we proceed with this call, I need to inform you that this call may be recorded or listened to for quality and coaching purposes' <p>See Call recording - information and access.</p> <p>Before releasing any information, it is imperative that the customer is authenticated as the person to whom the information relates to or a person the customer has authorised to receive the information. See Authenticating a customer.</p>

This must include checking the customer's current address and telephone number. Update as required. See [Updating address details](#).

If the customer has an **interpreter indicator**, and an interpreter is required, refer to [Offering an Interpreter](#) and [Booking an Interpreter](#) and ensure the interaction and action taken regarding engaging the services of an interpreter are recorded in the **Note**.

Whether the contact is successful or unsuccessful, staff must review and finalise the work item via the **Anomaly Mismatch** guided procedure.

Finalising the guided procedure will enable the customer to continue their online Employment Income Confirmation.

The guided procedure will generate a **Note** on the Integrated Review (PAYG Online Compliance Intervention) detailing the actions taken.

- Where an Anomaly or mismatch is supported, the Anomaly Mismatch guided procedure will remove the relevant match employer from the online workflow
- If the anomaly or mismatch is the only employer, the intervention will be completely removed from online workflow and procedure will end here

s 22

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Australian Government
Department of Human Services

Identify anomaly or mismatch for the check and update past income (CUPI) service 110-18092008

Currently published version valid from 21/08/2019 10:20 am undefined

This document outlines information for Compliance Officers (CO) who are actioning manual handoffs for the check and update past income (CUPI) service when a possible anomaly or mismatch has been identified.

Anomaly or mismatch identified

When a customer is completing the check and update past income (CUPI) service online and indicates they did not work for an employer identified in the [ATO Match Data](#), a manual assessment is required to determine if an anomaly or mismatch has occurred.

The [Resources](#) page contains a link to the ABN Lookup external website and the Requirements for documenting CUPI service interventions.

Related links

[Check and update past income \(CUPI\) service](#)

[Process Direct](#)

undefined

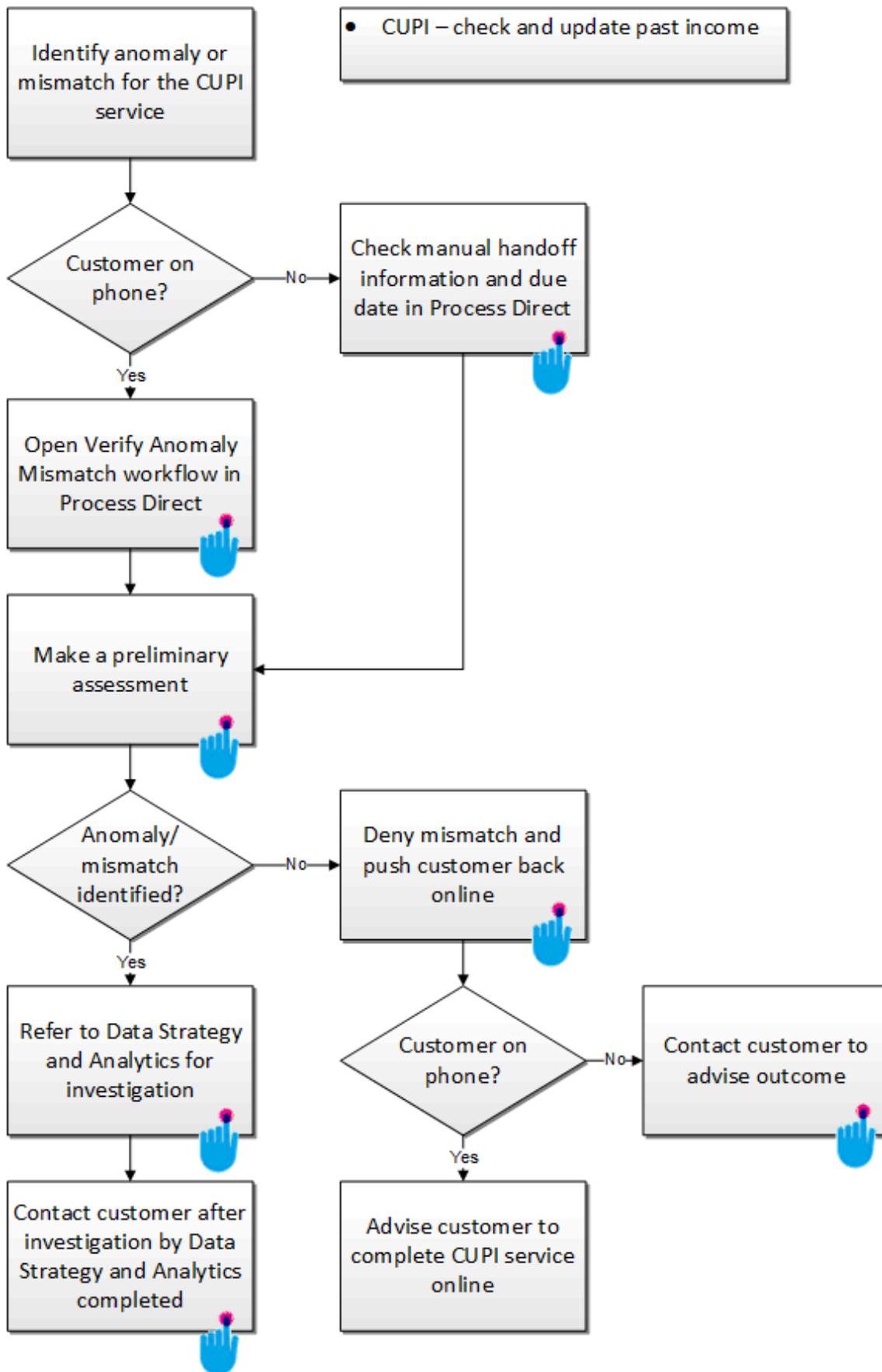
For staff conducting check and update past income (CUPI) service compliance interventions only.

Flowchart

Possible anomaly or mismatch identified

This page contains a summary of the process Compliance Officers (CO) follow when actioning manual handoffs for the check and update past income (CUPI) service when a possible anomaly or mismatch has been identified.

Note: [a text based version of the following process summary image is available.](#)



undefined

For staff conducting check and update past income (CUPI) service compliance interventions only.

This page contains the process for Compliance Officers (CO) to action manual handoffs for the check and update past income (CUPI) service where an anomaly or mismatch has been identified.

Anomaly or mismatch identified

Possible anomaly or mismatch identified for the CUPI service

Step	Action
1	<p>Is the customer on the phone? + Read more ...</p> <ul style="list-style-type: none"> • Yes, go to Step 3 • No, go to Step 2
2	<p>Customer not on the phone + Read more ...</p> <p>View the CUPI service intervention in Process Direct:</p> <ul style="list-style-type: none"> • Select Inbox • From the Main Category dropdown menu select Online Intervention • From the Type dropdown select Income Confirmation Service • In the Customer CRN field key the customer's Customer Reference Number (CRN) and select Go to search • Select the relevant Work Item to display the Interaction Details screen <p>The Integrated Review (Online Income Confirmation) will have a status of For Manual Action. Select  Notes to display the information about the manual handoff.</p> <p>Select  Attachments to view the Receipt file.</p> <p>Check to ensure the due date of the CUPI service intervention has been reached.</p> <p>Go to Step 4.</p>
3	<p>Customer on the phone + Read more ...</p> <p>In Process Direct select  then Verify Anomaly Mismatch to open the Verify Anomaly Mismatch workflow.</p> <p>This displays employers the customer has verified and potential mismatched employers.</p> <p>Ask the customer which employer they did not work for. All employers must be addressed.</p> <p>If the customer says they did not work for 1 or more of the match employers and were unable to confirm employer details by searching the ABN Lookup:</p> <ul style="list-style-type: none"> • Use ABN Lookup to do an ABN search. The Resources page has a link to ABN Lookup • Discuss the results with the customer <p>Did the ABN Lookup search resolve the anomaly or mismatch?</p> <ul style="list-style-type: none"> • Yes, go to Step 5 • No, review the customer record and determine if the anomaly or mismatch can be identified. Go to Step 4

4	<p>Preliminary assessment + Read more ...</p> <p>Use all information available to determine if an anomaly or mismatch exists between the customer and the ATO Match Data.</p> <p>The match data is not considered to be a mismatch if at least 2 commonalities can be identified between the customer and the match data. For example, name and date of birth matches or name and address matches.</p> <p>Alternative spelling or misspelling of a customer's name does not automatically constitute a mismatch.</p> <p>Note: take extra care matching information in the case of twins or intertwined records.</p> <p>Complete the following checks:</p> <ul style="list-style-type: none"> • Check the Customer Personal Details Summary (CPDS) screen for alternative names • Check Link Summary (LS) screen and Child Selection (CHS) screens for possible parents/children • Check Document List (DL) screen and Display on Access (DOA) for any DOCs which record the use of alternative names for employment and/or other purposes • Check Address History (ADH) screen and the On Lines Search (OLS) facility to determine if the customer lived at that address or in that zone in the match year <p>Using all the information available, determine if an anomaly or mismatch exists with the employers indicated.</p> <p>Can an anomaly or mismatch be identified from the customer record?</p> <ul style="list-style-type: none"> • Yes, go to Step 6 • No, go to Step 5
5	<p>Anomaly or mismatch denied + Read more ...</p> <p>If unable to validate that an anomaly or mismatch has occurred for any of the employers listed, deny the mismatches and push the customer back online.</p> <p>Open the Verify Anomaly Mismatch workflow in Process Direct where not already open:</p> <ul style="list-style-type: none"> • Select the relevant employer • Select No to deny the mismatch, then DONE • The Selected Action column against the employer will now display as Deny • Repeat for all employers that have not been verified already by the customer <p>Is the customer on the phone?</p> <ul style="list-style-type: none"> • Yes: <ul style="list-style-type: none"> ◦ Answer the customer's contact questions appropriately ◦ Document the details in the Notes field and select Post Note. The Resources page includes a link to the CUPI service documentation requirements ◦ Previous notes can be viewed by expanding Previous Notes ◦ Select Save ◦ Select Finish to finalise the workflow. Finalising the Verify Anomaly Mismatch workflow changes the status of the Integrated Review (Online Income Confirmation) back to Open, enabling the customer to continue the service online ◦  Advise the customer to continue the CUPI service online. Note: the customer will not be able to deny working for that employer again ◦ Procedure ends here • No, go to Step 8
6	<p>Anomaly or mismatch confirmed + Read more ...</p> <p>If the customer is on the phone, advise that:</p>

	<ul style="list-style-type: none"> • Further investigation is required and they will be contacted to advise the outcome and next steps • If they cannot be contacted, to advise the outcome, they will need to call Compliance to complete the CUPI service within 14 days. If they fail to contact within 14 days, the Department of Human Services will use the details on record, including the information from the Australian Taxation Office (ATO) to work out if the customer has been paid the right amount in the past <p>Refer all anomalies and mismatches to Case Selection, Planning and Engagement:</p> <ul style="list-style-type: none"> • Open the Verify Anomaly Mismatch workflow in Process Direct • Select the relevant employer • Select Yes to confirm the mismatch, then DONE • The Selected Action column against the employer will now display as Confirm • Repeat for all employers that require further investigation • Update any denied mismatches with the appropriate action • Document the details, including evidence found to confirm the anomaly/mismatch. In Notes then select Post Note • Previous notes can be viewed by expanding Previous Notes • Select  • Select  • Select  to refer to Case Selection, Planning and Engagement • Procedure ends here
7	<p>Contact customer after anomaly or mismatch investigated by Case Selection, Planning and Engagement + Read more ...</p> <p>When the anomaly or mismatch has been investigated by Case Selection, Planning and Engagement, the relevant mismatched employers will be confirmed for removal and a Workload Management System (WMS) work item is allocated to a CO to contact the customer to advise the outcome.</p> <p>The CO finalises the workflow and contacts the customer.</p> <p>Open the Verify Anomaly Mismatch workflow in Process Direct to review the work item then go to Step 8.</p>
8	<p>Contact customer + Read more ...</p> <p>Make 2 genuine attempts to contact the customer on all available numbers. Follow the contact requirements for CUPI service.</p> <p>Record all attempts to contact the customer under Customer Contact (including unsuccessful contact attempts). The Resources page includes the documentation requirements for CUPI service interventions.</p> <p>Was customer contact successful?</p> <ul style="list-style-type: none"> • Yes, go to Step 9 • No, go to Step 10
9	<p>Advise customer of outcome + Read more ...</p> <p>Advise the customer of the outcome of the investigation</p> <p>Select Finish to finalise the workflow in Process Direct. Finalising the Verify Anomaly Mismatch workflow changes the status of the Integrated Review (Online Income Confirmation) back to Open. This enables the customer to continue the service online.</p> <p>This will:</p> <ul style="list-style-type: none"> • Remove any mismatched employers •  Enable the customer to continue their service online where matched employers remain

	<ul style="list-style-type: none"> Cancel the review completely where no matched employers remain. The CUPI service will be completely removed from the online workflow
10	<p>Contact unsuccessful + Read more ...</p> <p>After the first attempt:</p> <ul style="list-style-type: none"> Answer the customer contact questions appropriately Select Save Re-enter the workflow the following day. Note: the Finish button is unable to be selected until the second contact attempt has been made. <p>After the second attempt:</p> <ul style="list-style-type: none"> Answer the customer contact questions appropriately Document the details in the Notes field and select Post Note Previous notes can be viewed by expanding Previous Notes Select Save Select Finish to finalise the workflow Finalising the Verify Anomaly Mismatch workflow changes the status of the Integrated Review (Online Income Confirmation) back to Open, enabling the customer to continue the service online. <p>This will:</p> <ul style="list-style-type: none"> Remove any mismatched employers  Enable the customer to continue their service online where matched employers remain Cancel the review completely where no matched employers remain. The CUPI service will not be completed removed from the online workflow <p>Where the due date:</p> <ul style="list-style-type: none"> has not been reached, no further action is required (as the customer can complete the CUPI service online) has been reached, follow the process in Customer does not respond to the Check and update past income (CUPI) service

Resources

External websites

[ABN Lookup](#)

Requirements for documenting CUPI service interventions

This attachment may not be printed, broadcast or released externally. For contact details and more information, see [Information Publication Scheme](#).



[Requirements for documenting CUPI service interventions](#)