Business Research and Innovation Initiative (BRII): Automatic Mutual Recognition of Occupational Registrations (AMR) Program

Webinar – 9 November 2021

This document captures the questions asked during the Business Research and Innovation Initiative (BRII): Automatic Mutual Recognition of Occupational Registrations (AMR) Program Webinar on 9 November 2021.

If a question was raised that isn't reflected in this document, please see the Webinar for the answer.

1. **I am a sole Trader for a Travel Agency. How does the Business Grant Apply. Please advise?**

   This grant opportunity is about providing up front grant funds for you to develop a feasibility study to address one of the challenges to improve occupational licensing information sharing and uptake of the Automatic mutual recognition of occupational registrations scheme.

2. **Approx. how many records are stored within these legacy systems per state?**

   Records managed by each regulator will vary. Note that challenges 1, 2 and 3 are about information matching and exchange between regulators.

3. **Is that information available? Has there been pre work that has already been collected? If so, where would we find this?**

   Some states and territories have public registers showing who holds a registration or licence and previous compliance history. Information and fields in these registers vary. Any available public registers are found online on regulator websites.

4. **If we are able to provide a solution that covers challenge 1, 2 and 3, do we need to respond to all 3 challenges or just challenge 1?**

   You will need to submit a separate application for each challenge that you wish to apply for. The program guidelines allow you to submit one application per challenge. However, you can only receive grant funding for one challenge in this round.

5. **Would we be able to get a dataset for each industry across jurisdictions that can be used in testing?**

   If you are a successful grantee you will have regular meetings with the government agency throughout the three month feasibility project period where more specific information, context and expertise around the challenge to be solved will be made available. There may be limitations with sharing a data set because of state and territory privacy laws.

6. **Can you describe some platforms of choice used by operators within each of the states? Is it predominantly Microsoft, or do you have multiple platforms in use?**

   Multiple IT systems are in use:

   - Most regulators have an underlying department IT system, some are paper based.
   - Regulators have custom built licence management systems and in some instances separate compliance management systems that pull information from a licence management system.
   - Compliance documents are likely to go to a compliance system and also a document management system.

- Some regulators have indicated that their systems have not benefited from advancements in technology.

7. **Is there such a thing as a Primary Registration where a person may have multiple registrations across States?**

AMR requires a person to hold registration in their home state covering the activity they intend to carry out in a second state. Should a person be eligible and meet the requirements they would be taken to hold automatic deemed registration in a second state. Should a person intend to operate in a third state they would need to make sure they meet the requirements for the third state. Requirements are outlined in the MRA and can include notifying the state of their intent to carry out an activity, meeting public protection requirements (which include things like insurance) and meeting any working with vulnerable people character checks.

8. **Could you give a list of legacy database in use by the regulators? is it possible to allow secure remote connection to the database?**

See answer to question 6 and:

- Some states and territories are more advanced and have internal systems that use application programming interface or APIs. However, many indicated that they don't use APIs and rely on email and excel spreadsheets to share information.
- Currently, information requested from other regulators interstate is sent via email or fax. Email is not a long term solution in many instances as it is not fit for purpose and is an administrative burden. SharePoint and Microsoft Teams have been used on some occasions also.
- Remote connection from an interstate regulator may be limited due to state and territory privacy laws and arrangements. Some states and territories may be in a position to change those laws to facilitate this access. This is something that can be explored through the feasibility stage.

9. **If they have multiple which one is the immutable version?**

This question could form part of a feasibility study.

10. **What are the legal implications of enabling the auditors to digitally access information across states?**

Some states and territories may have laws to protect personal information, thereby limiting access by an interstate regulator. The implications of not complying with these laws would be outlined in those specific laws. Some states and territories may be in a position to change those laws to facilitate this access. This is something that can be explored through the feasibility stage.

11. **If different jurisdictions have different requirements (e.g. one state requires an additional datum), are applicants required to provide that data when moving to the new jurisdiction.**

Licence holders seeking to work in a second state must have the evidence of the information required by the second state jurisdiction. However there are limitations on the information that can be shared to support verification. These are outlined in the MRA and were provided on the slide.

12. Have you already received data or feedback from people as to what would make the registration process easier for them?

Through the AMR reform, which came into effect 1 July 2021, the commonwealth have removed the requirement to hold a second state licence and therefore pay a second state registration fees. Through AMR BRII, the commonwealth are seeking solutions to assist states and territories implement this reform.

13. Hello. This question concerns bad actors whose credential is revoked by a state or territory. Do you foresee any problems with sharing that information across jurisdictions?

No. The MRA outlines the requirements for regulators to share information and includes provisions that override state and territory privacy laws.

14. The below information would greatly assist when preparing the submission for this Grant and during Feasibility Study and during the Proof of Concept phases (e.g. understanding of the extent of the challenge, resources and budget requirements).

   i.   *Is it possible to request and obtain some information from AMR / Challenging agencies / Occupational Regulators now (or during the Feasibility Study and during the Proof of Concept phases, if successful)? e.g.*
      a.   Number of occupation regulators in each state and territory for each challenge.
      b.   Number of licence holders in each occupation.
      c.   Sample format of the type of information currently stored.
      d.   All historic licence holders' information during proof of concept phase.
      e.   Information on any agreed data interoperability standards or models, and interim solutions developed to administer AMR or in the process of being developed?
      f.   Information on current regulator systems and processes.
      g.   Etc.
   ii.   *Can the AMT / challenging agency / Occupational Regulators assist with promoting / uptake / marketing of the solution during and after the Proof of concept phase?*
   iii.   *Is it possible to get a copy of the draft agreement for Proof of Concept phase?*

Many of these questions have been answered either verbally or above. Fact sheets for the challenges as well as guideline information for the Feasibility Study and Proof of Concept grants can be found on business.gov.au/BRII

Applicants should tell us how their feasibility study will address the problem statement, solution and technical requirements outlined in the challenge factsheets online. These factsheets were developed with the regulators who are keen to partner in the program.

Successful applicants get the opportunity to work directly with multiple interstate regulators. Interstate regulators will meet with successful applicants to explain their systems, their constraints, let them know their desired outcomes and inform the direction of any solution design.

In terms of volume:

- Numbers for individual licence types vary.
- PM&C estimate that over 168,000 people will directly benefit each year, including 44,000 people who will work interstate that would not otherwise have done so.
- As an example: the Department of Mines, Industry, Regulation and Safety (DMIRS)'s in WA highest volume licenses are expected to be electricians, plumbers, builders and real estate agents. They are expecting over 2000 AMR notifications a year.
- As a further example: South Australia's Consumer and Business services in their Attorney Generals Department expect their top AMR users to be electrical, plumbing/gas fitters and building related occupations. There have been between 800 and 1200 MR applications per year and expect that majority of these will use AMR moving forward.

15. Any expectation that governments' existing approaches to Digital Identity for individuals/businesses will need to be considered or integrated in proposed solutions?
This could be explored with state and territory regulators during the feasibility study stage.

16. Do you have any KPIs relating to the immediacy of AMR check results and / or time spent by state-level operators?
Processing Mutual Recognition applications has predominately been a time consuming manual task, with some states responding to requests for information within weeks while others are able to respond within days.

17. Where can we get the information of the challenge related agencies network information and based on this we will provide solution in application proposal?
Successful applicants get the opportunity to work directly with multiple interstate regulators. Interstate regulators will meet with successful applicants to explain their systems, their constraints, let them know their desired outcomes and inform the direction of any solution design.

18. Is there a particular reason for Challenge 1 2 and 3 are separated out? There may be solutions which can resolve all three challenges.
Challenge 1 is open to solutions that could address information sharing challenges across all sectors or a sector not outlined in challenge 2 and 3. Challenge 2 is about improving information matching and exchange between jurisdictions for the building and construction industries. Challenge 3 is about improving information matching and exchange between jurisdictions for security, property, transport and liquor and gaming industries. The program guidelines allow you to submit one application per challenge. However, you can only receive grant funding for one challenge in this round.

19. This will definitely benefit the economy and eliminate the red tape for FIFO and DIDO workers allowing skilled interstate specialist trades. Is there indication of when the remaining states are open to the idea and transition with the program?
Other than the ACT (who have commenced AMR), in December 2020 all states and territories signed an Intergovernmental Agreement on Automatic Mutual Recognition of Occupational Registration found:
https://federation.gov.au/sites/default/files/about/agreements/amr-iga-signed-11-december-2020.pdf

20. Can you please clarify high risk activities? And who would be responsible for logging their activities?

In the webinar high impact, high risk activities was in reference to freeing up regulator time to focus on compliance activities (rather than application processing).

21. Apart from disciplinary reasons, why might a cross-jurisdiction request be denied?

As already mentioned, applicants should tell us how their feasibility study will address the problem statement, solution and technical requirements outlined in the challenge factsheets online. As we are dealing with personal information, as outlined in the factsheets, security and privacy considerations are vital.

22. Is the Commonwealth likely to be a possible "government customer" or will each state and territory government ultimately be the customer?

As mentioned in the webinar, these discussions occur at the end of the Proof of Concept phase. At this time discussions could occur between commonwealth and relevant regulators on next steps to inform consideration of purchase, potential roll out etc.

23. Is it valuable to assume that states are completely blank about other state's policy or regulation variations? In which case, would it be a part of challenge to bring one state regulator to agree to a unified registration system for the whole system to operate uniformly?

No - it would not be part of the challenge to bring one state regulator to agree to a unified registration system. As outlined above, the MRA outlines the specific information that must be shared between states.

24. Does a copy of the licence and its records need to be in data jurisdiction of the mutually recognising state/territory or just a record of mutual recognition?

As outlined in the factsheet, we are seeking challenge 1, 2 and 3 to:

- verify occupational licence information about an individual from another jurisdiction
- access the information it reasonably requires from another state regulator
- notify other regulators of relevant disciplinary action
- notify all other regulators of end of licence, suspension, or cancellation of a licence.

25. Is there a number of years of experience needed to prove your track record? What is considered unintentional errors that they can contact us about, in order to avoid them? What are some errors that aren't considerable? If we're entering in partnership (company), how does the labour expenditure apply, as it mentions that only 10% of the total amount of eligible expenditure can be claimed? How strict are they around the number of years of business involved?

Merit criterion 3 goes to capacity, capability and resources to deliver the project. The guidelines do not state that you must demonstrate a particular number of years of experience to prove your track record. It is for the applicant to demonstrate their track record as best they can in their response.

Unintentional errors may include things like omitting to sign or date a document, or uploading the wrong document. Program management may contact applicants should we find an error or information that is missing, or ask for clarification or additional information that will not change the nature of your application. For example, wanting to submit an

amended response to the merit criteria after the closing date cannot be accepted because it will change the nature of your application.

Eligible labour expenditure for the grant covers the direct labour costs of employees you directly employ on the core elements of the project. Technical project management activities are eligible activities and can be claimed, but is limited to 10% of the total amount of your eligible labour expenditure. Labour expenditure for leadership or administrative staff (such as CEOs, CFOs, accountants and lawyers is not considered eligible expenditure.

This program is aimed at small to medium sized enterprises, and is open to newly formed companies, including start-ups. Entities which meet the eligibility requirements are able to apply for the grant opportunity.

26. Is there expectation that the personal information must be kept within the state of the regulator? In other words, is it possible to store information securely in Sydney, but only the regulator can access their own information?

Personal information must be shared and stored by the receiving state in a manner consistent with state privacy laws and arrangements. Each state has different requirements. Innovative solutions to do this could be explored as part of a feasibility study.

27. Will it sway the decision-makers' decision of application, if we don't put our own contribution? Can we apply for Territory Gov grants?

This grant opportunity is providing small to medium sized enterprises with an up-front payment of up to $70,000 to develop a feasibility study. The grant amount will be up to 100% of eligible project costs. In other words, grantees are not expected to match grant funds.

Please note that if you are successful and enter into an agreement under the program, you cannot receive other grants for this project from other Commonwealth, State or Territory granting programs. Please refer to section 11.1 of the guidelines.

28. If possible, can you provide examples of what personal data will be held on the platform of this project solution vs personal data held with the regulators?

Successful applicants get the opportunity to work directly with multiple interstate regulators. And at that time, we can verify such questions directly. Examples of personal information include date of birth, contact information and compliance history.

29. The maximum project period for the Proof of Concept grant is 12 months. What if the project needs future patches, hot fixes, security updates?

A proof of concept builds on a feasibility study, and involves undertaking a set of activities to produce a working prototype or demonstration of an innovative solution to a challenge.

Eligible activities must directly relate to the project and can include work to determine:

- the nature, functionality and capabilities of the innovative solution
- differentiation of the innovative solution from any similar existing products or services
- performance of the innovative solution in the relevant operational environment(s).

Successful grantees will have 12 months to develop the proof of concept or prototype. Grantees will be asked to present their findings towards the end of their project, to assist in ensuring there is an in-depth understanding of your findings and proposed solution.

30. Will a Memorandum of Understanding be enough to join as a group to deliver a project?

The guidelines state that applicants must have a formal arrangement in place with parties prior to execution of the grant agreement. A memorandum of understanding is an example of a formal arrangement between the parties.

31. If you enter an agreement under the program, you cannot receive other grants from other Commonwealth granting programs. How about state or territory grants?

If you are successful and enter into an agreement under the program, you cannot receive other grants for this project from other Commonwealth, State or Territory granting programs. Please refer to section 11.1 of the guidelines.

32. Will the federal government or each state provide assistance to the interpretation of equivalent activity, equivalent conditions?

Successful applicants get the opportunity to work directly with multiple interstate regulators. And at that time, clarify the questions directly. There are a range of Ministerial Declarations on the Federal Register of Legislation that outline the equivalence between occupational registrations. In AMR, there is no concept of equivalent activity or equivalent conditions.

33. Why has the funding level dropped so much from previous BRII challenges given the high level of complexity for the challenge?

Different rounds of the BRII program have different grant sizes and lengths depending on the challenges, complexity and total funding available for the round. The RegTech BRII round had Feasibility Study grants of up to $100,000 and Proof of Concept grants of up to $1m for a 15 month project. For the AMR round, slightly smaller grant amounts are available for the Feasibility Study and Proof of Concept. This is due to the total funding available.

34. How many successful applicants can there be? Is it just one per challenge?

The total allocation of grant funding is $1.1 million for feasibility studies, and $5.4 million for proofs of concept. Therefore it is expected that there could be multiple successful applicants under each challenge.

35. Is a local micro business (prime applicant) who is GST registered but has no payroll system able to apply with a back end partner of a company whose income is more than 20M USD and more than 100 employees?

We recognise that some organisations may want to join as a group to deliver a project. Joint applications are acceptable, provided you have a lead organisation who is the main driver of the project and is eligible to apply, as per section 5 of the guidelines.

Project partners are not required to meet the eligibility criteria. Refer to section 8.2 of the guidelines for more information about joint applications.

36. Is there one committee assessing applicants for all 4 challenges. Or 4 committees?

There is one external committee assessing applications for all four challenges.

37. Do we have timelines on when will the decision be made on selection for the initial feasibility study?

It is expected that outcomes will be known in March 2022.

38. How would they price the purchase of the solution?

Grantees will retain intellectual property rights and the right to sell in domestic and global markets. At the completion of the proof of concept stage, we expect grantees, in the first instance, to conduct negotiations for any potential sale of the solution to the participating Australian Government in good faith. Agencies will decide whether to purchase any solution at their own cost. Any procurement must comply with the Commonwealth Procurement Rules. At the end of the proof of concept stage, the Australian Government and or state and territory government agencies may purchase a solution from any grant recipient.

39. Can you please explain how the govt. would acquire the solution post POC? How would that transaction be priced, and is it at "market value" and can the company refuse to sell the solution if it intends to run as an ongoing business?

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40. How critical is the marketing plan for application as the solution is solely targeted towards a government level challenge?

Assessment criterion 2 is worth 30 points of your total assessment. Applicants are asked to identify the clear commercial potential to create a marketable product, process or service for customers beyond the government agency, including a plan to deliver the solution and the route to local and/or global markets, including a market analysis. One of the mandatory attachments applicants are required to upload is a project plan including a detailed budget. A market analysis can be included in your project plan.

41. Do you require formal invoice/quotations from any external contractors we plan on engaging or can we utilise past costing to provide an approximate figure for the initial application as timeframe is close 30/11?

Applicants are not required to submit formal invoices or quotations, and consequently you can rely on your own costing knowledge to submit your detailed budget.