



Australian Government  
Department of Employment  
and Workplace Relations

# Data-matching Program Protocol

## Single Touch Payroll Initial Data Share for Workforce Australia

Data-matching between the Australian Taxation Office (ATO) and the Department of Employment and Workplace Relations (the department)

October 2024

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## Definitions

Term	Definition
Matching Agency	In relation to a Data-matching Program, it is the agency that has ownership for the information technology facilities or resources being used to conduct the data-match comparison. In the case of this protocol, the matching agency is the Department of Employment and Workplace Relations (the department).
Pay Event	This is the file generated by Single Touch Payroll (STP) enabled software, which includes payments subject to PAYG withholding.
Data-Matching	Data-matching is combining two or more sets of data that contain personal information, that have come from different sources, and the comparison of those data sets with the intention of producing a match.
Mutual Clients	Individuals that have a relationship with both the department and the ATO.
Source Agency	The source agency is the agency that discloses a data base or data set containing personal information to a matching agency for use in a Data-matching Program. In the case of this protocol, the source agency in the Australian Tax Office (ATO).

## Purpose

The purpose of this Data-matching Program Protocol is to inform the public about the existence and nature of the Workforce Australia and Single Touch Payroll Data-matching Program and 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 considered 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
- indicate what form of notice is to be given, or is intended to be given to individuals whose privacy is affected by the program
- specify any time limits on the conduct of the program.

**Next review date: July 2025**

# Overview of the Data-matching Program

## Overview

Single Touch Payroll (STP) is an Australian Government initiative designed to streamline business reporting to Australian Government agencies. This is achieved by businesses using STP-enabled payroll software, which reports certain payroll information about their employees to the Australian Taxation Office (ATO).

The Department of Employment and Workplace Relations (the department) is collaborating with the ATO to develop and deliver a project (initial data share) to confirm three use cases (Use Cases) in relation to the department's administration of the employment services program known as Workforce Australia.

The initial data share will be used to confirm improvements to the employment services program and support further reform. The STP data received through the initial data share will be used to determine the relevant outcomes for the relevant time. The department has determined that no consequences will flow as a result (e.g. contact will not be made with any businesses who employ Workforce Australia participants (employers), Workforce Australia Providers (providers) and individuals participating in Workforce Australia (participants) based on the Use Case outcomes.

The activities and operations of providers, employers and participants will continue as normal during the initial data share. The initial data share will run concurrently with the existing processes for the administration of Workforce Australia.

The three Use Cases are:

- Outcome Payments: STP data will be used to confirm eligibility for outcome payments paid to providers.
- Wage Subsidies: STP data will be used to determine employer eligibility for a wage subsidy agreement and/or payment.
- Mutual Obligations: STP data will be used to determine if a Participant has worked during their 'mutual obligation' period to 'nudge' participants to claim Points Based Activation System (PBAS) points to satisfy their requirements under the social security law.

STP data will only be used for the above Use Cases. The department will not, for example, be permitted to use STP data for any overpayment, fraud or non-compliance activities (e.g. to take compliance action against participants, employers or providers).

Data will be shared as a one-off arrangement and will involve approximately 46,000 participants. The number of participants for whom this program applies may change when STP data exchange begins, for example if a statistically valid number of matches are not provided to confirm each Use Case.

The implementation of the initial data share will require the department to handle a range of information about participants and employer personnel, which is 'personal information' as defined in the *Privacy Act 1988 Cth* (Privacy Act). It may also require the department to handle some (but minimal) personal information about individuals who operate as sole traders.

## The Department's Privacy Policy

The department's privacy policy has detailed information about how we collect, hold and disclose data and information about what a program user or stakeholder can do if not satisfied with how their information has been treated. If a program user or stakeholder is not satisfied with how the department collected, held, used or disclosed their personal information, they can make a formal complaint.

Via email:

[privacy@dewr.gov.au](mailto:privacy@dewr.gov.au)

Via pre-paid post:

The department prefers that you mail your privacy complaint to the following address:

Privacy Officer  
Legal and Assurance Division  
Department of Employment and Workplace Relations  
Location Code: C50MA1 - LEGAL  
GPO Box 9828  
Canberra ACT 2601

Via telephone:

The department's switchboard number is 1300 488 064.

To ensure that the department fully understands the nature of your privacy complaint and the outcome you are seeking, the department prefers that you make your privacy complaint in writing.

If you are unhappy with the department's response to your privacy complaint you can lodge a complaint with the Office of the Australian Information Commissioner (OAIC). More information about the OAIC and how to lodge a complaint can be found on [the OAIC website](#). The OAIC generally prefers that individuals complain to the agency in the first instance before lodging a complaint to the OAIC.

The department's Privacy Policy can be found at [www.dewr.gov.au/about-department/resources/dewr-privacy-policy](http://www.dewr.gov.au/about-department/resources/dewr-privacy-policy).

## Description of the STP Data-matching Program

### Summary of the Program

Using the Data-matching Program, the department will source STP data from the ATO for individuals who were a participant at the relevant time-period. The department will provide the ATO with information relating to a population of participants and employers from the department's IT systems. The ATO will match the information against their data holdings to identify relevant STP data.

As a first step, the Data-matching Program will identify those individuals who have a relationship with both the department and the ATO (referred to as "mutual clients"). This is done by the

department providing information about participants and some employers to the ATO, and the ATO matching that information against ATO records to locate a mutual client match.

For those participants who the ATO determines a match with high confidence, the department will provide the ATO with the data duration required for the Use Case. The ATO will then provide the department with STP data it holds for those mutual clients.

## Objectives

The objective of this Data-matching Program is to confirm STP data can be successfully used to administer each of the Use Cases. This data will include information about employers currently employing participants, as well as information about participants who were previously employed by an employer.

## Outcomes

In achieving the objectives of the Data-matching Program, the department will achieve the following outcomes:

- evidence that STP data can be used to create efficiencies for the department and its contracted Providers in administering employment services
- reduce employer and participant burden by minimising the contact that employers and participants must have with the department to provide employment information.
- making digital services that are simple, efficient, and better connected, in alignment with Government priorities.

## Requirement for a Data-matching Program

The Office of the Australian Information Commissioner's Guidelines on data matching in Australian Government administration (Guidelines) specifies that a program protocol should be prepared by agencies conducting Data-matching Programs. These guidelines are voluntary but represent the Australian Information Commissioner and Privacy Commissioner's view of best practice. The department complies with these guidelines.

The Guidelines are aimed at assisting Australian Government agencies with the use of data matching as an administrative tool. The Guidelines outline how data matching should be done to comply with the Australian Privacy Principles (APP) and the *Privacy Act 1988 Cth* (Privacy Act), in a manner that is consistent with good privacy practice.

The Workforce Australia and Single Touch Payroll Data-matching Program has been developed in accordance with the Guidelines.

The ATO is the sole source agency that supplies data to the department for the purposes of this Data-matching Program. The ATO solely relies on STP data provided to them from employers reporting through STP.

The department is the sole matching agency using data from the ATO as part of this Data-matching Program. The department will only receive STP data from the ATO for individuals confirmed to be

mutual clients. The STP data will be matched against conditions falling within the data exchange agreement and used to deliver the objectives outlined above.

## The Data-matching process

For the ATO to identify mutual clients of interest, the department will disclose personal information for individuals and employers to the ATO.

The data exchange will be based on the following:

- **The department’s client of interest** – a participant in, or who has participated, in Workforce Australia.
- **Employer** – employer and participant relationship (as agreed in the relevant Use Case).
- **Period** – start and end dates (as agreed in the relevant Use Case).

The ATO will provide the source data to the department.

Entity	Activities
ATO	The ATO to process Mutual Client requests, matches the clients of interest, and exchanges related STP data where there is a match with the department.
the department	The department matches the STP data returned by the ATO and confirms it is for the relevant client of interest and then use the data in accordance with the relevant Use Case.

The department will only disclose to the ATO the minimum personal information which is necessary for the ATO to have a sufficiently high degree of confidence about whether or not a Participant is a mutual client of both the ATO and the department. The ATO will undertake the identity matching.

The ATO will only disclose personal information to the department if it is satisfied to a ‘high confidence’ level in the matching result (i.e. that a Participant is a mutual client). The department will conduct quality assurance checks of information provided by the ATO, to ensure that it also has a high confidence level that it relates to the correct participants.

## Data Elements

The data elements disclosed to the ATO relating to clients of interest are outlined in Appendix A – Table 1.

Where the ATO can match the client of interest with a high level of confidence, to an ATO client, a mutual client relationship is established. This matched relationship, will provide the confirmation for an exchange of STP data between both agencies.

The information returned to the department via STP data exchange with the ATO will contain the clients of interest STP data such as:

- year-to-date payment details (e.g.: income, allowances, deductions, employment termination payments)
- pay period details (e.g.: start and end dates, payment dates)
- employment commencement and cessation dates.

Full details of the data elements within the exchange agreement are set out in Appendix A.

## Number of records in the data exchange

This program applies to approximately 46,000 participants. The number of participants for whom this program applies may change when STP data exchange begins, for example if a statistically valid number of matches are not provided to confirm each Use Case.

## Data Quality

Mechanisms that will be put in place to ensure the quality of data exchanged as part of this Data-matching Program Protocol include:

- the ATO will only provide data for clients of interest where there is a high confidence regarding the identification of the 'right' individual
- the department will undertake pre-validation checks on client data before sending data for individuals of interest to the ATO. The ATO will identify Mutual Clients of interest and notify the department of confirmed Mutual Clients.
- the department will check that the STP data received from the ATO is for the expected client
- where risks of unexpected or out of order payroll processing of the STP data is identified, the STP data will be flagged to minimise misinterpretation in its use.

Both the department and the ATO will jointly be responsible for maintaining the integrity of the data exchange through an exceptions handling process, which will promptly notify the other party of any issues and/or incomplete records and will reach agreement on secure procedures for data transfer and storage to be followed.

## Data Integrity

The data provided by the ATO will be supplied in accordance with reporting specifications, which are inclusive of record layout and data format for each record. Data will be transformed into a standardised format and validated to ensure that it contains the required data elements before it is provided to DEWR.

## Data Security

Data will be transferred into a standardised format and validated to ensure that it contains the required data elements prior to being exchanged between the department and the ATO.

The ATO and the department will exchange data using SigBox and Secure File Transfer Protocol. These mechanisms provide secure and trusted communications across government jurisdictions.



The department's core systems have strict security controls. Only users with a business need to access data can view the STP data provided under this program, with that being managed by authentication, authorisation and security roles to ensure that access to information is on a need to know only basis.

The department's staff are subject to existing security controls and confidentiality provisions under laws including: the *Privacy Act 1988*, the *Crimes Act 1914* and the *Public Service Act 1999*.

The ATO is responsible for its own security with respect to its staff and access to the data. The ATO is subject to existing security controls and is subject to:

- *Privacy Act 1988*
- *Social Security (Administration) Act 1999*
- *Crimes Act 1914*
- *Public Service Act 1999*.

Access to the ATO's computer systems is aligned with the Protective Security Policy Framework, Australian Government Information Security Manual 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.

### Time limits applying to the Program

The data matching activity is intended to be conducted as soon as practicable; it is intended that this will occur just once, however a second data matching activity may be required to support the objectives of the project.

The department will handle the data received from the ATO in accordance with the *Privacy Act 1988*, the *Archives Act 1983* and any relevant records authority.

## Public Notice – STP Data-matching Program

The Program will be published on the department website. A notice will also be published in the Australian Government Gazette (refer **Error! Reference source not found.**) before the use of the STP data.

## Reasons for conducting the Program

### Relationship to lawful functions

The Data-matching Program relates to the department's lawful function of administering the employment services program known as Workforce Australia.

### Legal authority

The disclosure of personal information by the department to the ATO is consistent with the primary purpose for which the department collected the personal information which is to administer Workforce Australia and provide participants with appropriate services and assistance and is

permitted under Australian Privacy Principle 6. In addition, the disclosure is authorised under sections 202(2)(d) or 202(2A) of the *Social Security (Administration) Act 1999*.

The disclosure of STP Data to DEWR for the purposes of administering the social security law is authorised under item 1, Table 1 of subsection 355-65(2) of Schedule 1 to the *Taxation Administration Act 1953*.

## **Alternative methods**

Current methods may rely on employers, providers or participants to provide information, such as payslips. The initial data share will confirm STP data can support the department to reduce the reporting burden employers, providers and participants.

There are no practical alternatives to this Data-matching Program, as the relevant data (payroll information) is held by the ATO.

## **Prior Data-matching Programs**

There have not been any prior Data-matching Programs for this purpose.

## **Costs and benefits for Data-matching Programs**

The department and the ATO will incur the costs to conduct the Data-matching Program. The activities described in this program are part of the 2024-25 Federal Budget Measure – ‘Employment Services Reform - Strengthening IT Foundations and Reducing the Administrative Burden (Single Touch Payroll)’. The costs include:

- design new technical solutions to exchange STP data between the department and the ATO
- data analysis resources to identify and analyse the data to detect data quality issues
- governance resources to ensure compliance with the Guidelines, Privacy Act and secrecy provisions, and quality assurance processes to ensure the rigor of the work undertaken by analysts and staff
- resources for the purpose of data discovery efforts
- storage of the data.

STP data will be used to administer Workforce Australia Use Cases and confirm the benefits of sharing employment information including reducing reporting burden on employers and providers, as well as streamline services for participants.

## Appendix A – STP data sets

**Table 1 – Data from the department to the ATO.**

Description
<u>Mutual Client of Interest Request</u>
<b>Field name</b>
Client ID
Given Name
Other Name
Family name
Date of Birth
Address Residential
Address Postal
Phone Number -mobile
Phone Number - home
Email Address
<u>Employer Relationship Request – Only for the Wage Subsidy Use Case</u>
<b>Field name</b>
Legal Name or Business Name (Both if available)
Australian Business Number
Address – Business
Address – Postal
<u>Wage Subsidy Use Case Request</u>
<b>Part 1</b>
<b>Field name</b>
Client ID
Agreement Start date
ABN
<b>Part 2</b>
<b>Field name</b>
Client ID
Agreement Start date
Agreement End date
ABN
<u>Outcome Use Case Request</u>
<b>Field name</b>
Client ID
Start date
End date
<u>Mutual Obligation/PBAS Use Case Request</u>
<b>Field name</b>
Client Id
Start date
End date

**Table 2 – Data from the ATO to the department**

<b>Simplified Field Name</b>	<b>Description</b>
Financial year	The financial year that the payevent relates to.
Payer client external identifier	Identifies the Payer who has reported the payevent to the ATO.
Payer client external identifier type code	Identifies the Payer's external identification type.
Payer Branch number	The branch number of an organisation.
Payer reported branch number	The branch number of an organisation, as reported by the payer.
BMS ID	Identifies the Business Management Software (BMS) system used by the employer.
Previous BMSID	Is used to transfer payee year to data values from an old Business Management Software (BMS) ID to the new BMS ID for the payee.
Payroll ID	Identifier allocated by the payer payroll system to identify a payee.
Previous payroll ID	Is used to transfer payee year to data values from an old Payroll ID to the new Payroll ID for the payee.
Payer form transaction ID	Identifies the associated parent's payevent transaction ID.
External agency identifier for the payee	Identifies the payee's external identifier
External agency identifier Type for the payee	The external agencies identification type for the Payee
Payee Family name	The payee's family name.
Payee Given name	The payee's first name.
Payee Other name	The payee's other name.
Payee date of birth	The payee's date of birth.
Payee Address	The payee's address line 1.
Payee Address	The payee's address line 2.
Payee Suburb	The payee's locality/suburb.
Payee State	The payee's state or territory.
Payee post code	The payee's postcode.
Payee country code	The payee's country.
Payee ABN (contractors)	The payee's contractor ABN.
Pay run Time stamp	Date timestamp that reflects the year to data figures for a payee at that exact point in time.
Form Lodgement date	Date the PAYEVNT message is received in the incoming channel e.g. SBR.
Pay/update date	When this field is for a Submit event, it reflects Payment date. When this field is for an Update event, it reflects the Update date. When this field is for an ATO Update event, it reflects the Update date.
Final event indicator	Indicates whether the report is the employer's final payroll for the specified reporting period. It can be reverted to FALSE at any point
Period start date	The initial date of the period for the payevent. Only provided on a submit event.
Period end date	The final date of the period for the payevent. Only provided on a submit event.
Lodgement channel	The Lodgement Channel Version of the payevent that is determined by the software generating and sending PAYEVNT to the ATO.
Software product ID	The ID of the software product.
Submission ID	Unique identifier to identify a transaction.
Low Confidence Indicator (if available)	The code describing the action completed based on the low confidence.

Commencement Date	The commencement date when a payee started employment or is rehired using the same Payroll ID.
Cessation Date	The cessation date when a payee ended employment using the same Payroll ID.
Employment Basis	The basis of payment indicates the type of working arrangement between the payer and payee.
Exchange Id	The data exchange identifier. This identifier is unique for each data exchange agency.
Exchange creation time stamp	The generation date and time of the data exchange.
Agency name	The name of the external agency.
Data exchange reason	The code describing the reason the data exchange has occurred.
Pay event form transaction Id	Identifies the payee's payevent transaction ID.
Pay event type	The event type of the lodgement.
Pay event status	The status of the exchange event.
<b>Additional Fields Wage Subsidy Use Case Only</b>	
<b>Field name</b>	<b>Description</b>
Payer unstructured Full name	Payer unstructured Full name
Payer post code	Payer post code
Payer country code	Payer country code
Income Stream Collection	The income type of payment that is reported.
Income Stream Collection - Gross amount	Gross remuneration amount (less other amounts reported elsewhere for the income type.)
Income Stream Collection - Bonuses and commissions	Gross bonuses and commissions for the income type.
Income Stream Collection - Overtime	Gross overtime amount for the income type.
Income Stream Collection - Directors Fees	Gross Income Directors Fee amount for the income type.
Income Stream Collection - Paid leave amount	Total gross paid leave amount.
Lump Sum A	Gross amount of lump sum A payment made to a payee.
Lump Sum B	Gross amount of lump sum B payment made to a payee.
Lump Sum D	Gross amount of lump sum D payment made to a payee.
Lump Sum W	Gross amount of lump sum W payment made to a payee.
Total Lump Sum E	Gross amount of lump sum E payment made to a payee.
Income Stream Collection - Allowance amount	Gross Allowance amount.
Income Stream Collection - Salary sacrifice amount	Gross amount sacrificed by the payee.
Income Stream Collection - ETP tax free amount	The Employment Termination Payment Tax Free component.
Income Stream Collection - ETP taxable component amount	The Employment Termination Payment taxable component.
<b>Additional Fields Outcome Use Case Only</b>	
<b>Simplified Field Name</b>	<b>Description</b>
Payer unstructured Full name	Payer unstructured Full name
Payer post code	Payer post code
Payer country code	Payer country code
Income stream collection S&W and LAB only	The income type of payment that is reported.

Gross amount	Gross remuneration amount less other amounts reported elsewhere for the income type.
Bonuses and commissions	Gross bonuses and commissions for the income type.
Overtime	Gross overtime amount for the income type.
Directors Fees	Gross Income Directors Fee amount for the income type.
Total Paid leave	Total gross paid leave amount.
Lump Sum A	Gross amount of lump sum A payment made to a payee.
Lump Sum B	Gross amount of lump sum B payment made to a payee.
Lump Sum D	Gross amount of lump sum D payment made to a payee.
Lump Sum W	Gross amount of lump sum W payment made to a payee.
Total Lump Sum E	Gross amount of lump sum E payment made to a payee.
Total allowances	Gross Allowance amount.
Salary sacrifice amount	Gross amount sacrificed by the payee.
Income Stream Collection ETP payment date	The date when the employment termination payment was made to the employee
Income Stream Collection ETP tax free amount	The Employment Termination Payment Tax Free component.
Income Stream Collection ETP taxable component amount	The Employment Termination Payment taxable component.
<b>Additional fields Mutual Obligation Use Case only</b>	
<b>Field name</b>	<b>Description</b>
Income Stream Collection	The income type of payment that is reported.
Income Stream Collection - Gross amount	Gross remuneration amount less other amounts reported elsewhere for the income type.
Income Stream Collection - bonuses and commissions	Gross bonuses and commissions for the income type.
Income Stream Collection - Overtime	Gross overtime amount for the income type.
Income Stream Collection - Directors Fees	Gross Income Directors Fee amount for the income type.
Income Stream Collection - Salary sacrifice amount	Gross amount sacrificed by the payee.

## Department of Employment and Workplace Relations

### Notice of a Data-matching Program for the Workforce Australia Single Touch Payroll Initial Data Share.

The Department of Employment and Workplace Relations (the department) is collaborating with the Australian Taxation Office (ATO) to develop and deliver a project (initial data share) for three use cases (Use Cases) in relation to the department's administration of the employment services program known as Workforce Australia.

The three Use Cases are:

- Wage Subsidies: Single Touch Payroll (STP) data will be used to determine employer eligibility for a wage subsidy agreement and/or payment.
- Outcome Payments: STP data will be used to determine eligibility for an outcome payment for providers.
- Mutual Obligations: STP data will be used to determine if a participant has worked during their 'mutual obligation' period to 'nudge' participants to claim Points Based Activation System (PBAS) points to satisfy their requirements under the social security law.

The activities and operations of providers, employers and participants will continue as normal during the initial data share. The department has determined that no consequences will flow on as a result (e.g. contact will not be made with any provider, employer or participant based on the Use Case outcomes).

Additionally, the department will not be permitted to use STP data for any overpayment, fraud or non-compliance activities (e.g. to take compliance action against participants, employers or providers).

The Data-matching Program will identify those individuals that have a relationship with both the department and the ATO (referred to as "mutual clients"). This is done by the department providing information about participants and some employers to the ATO, and the ATO matching that information against ATO records to locate a mutual client match.

The department will only disclose to the ATO the minimum personal information which is necessary for the ATO to have a sufficiently high degree of confidence about whether or not a participant is a mutual client of both the ATO and the department.

For those participants with a high confidence match, the department will provide the ATO the duration of data required for the Use Case. The ATO then provides the department with STP data it holds for those mutual clients.

Data will be shared as a one-off arrangement and will involve approximately 46,000 participants. The number of participants for whom this program applies may change when STP data exchange begins, for example if a statistically valid number of matches are not provided to confirm each Use Case.

The Department of Employment and Workplace Relations complies with the Office of the Australian Information Commissioner's Guidelines on data matching in Australian government administration. This includes standards for data matching to protect the privacy of individuals. A full copy of the Department's privacy policy can be accessed at <https://www.dewr.gov.au/about-department/resources/dewr-privacy-policy>