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TARGETED COMPLIANCE FRAMEWORK

Department of Employment
and Workplace Relations

Statement of Assurance
18 June 2025



Limitations

Inherent Limitations

The Services provided under this engagement were advisory in nature and have not been conducted in accordance with the standards issued by the Australian Auditing and Assurance Standards Board and consequently no opinions or conclusions under these standards are expressed. The matters raised in this report are only those which came to Deloitte's attention during the course of performing the assessment and are not necessarily a comprehensive statement of all the weaknesses that exist or improvements that might be made.

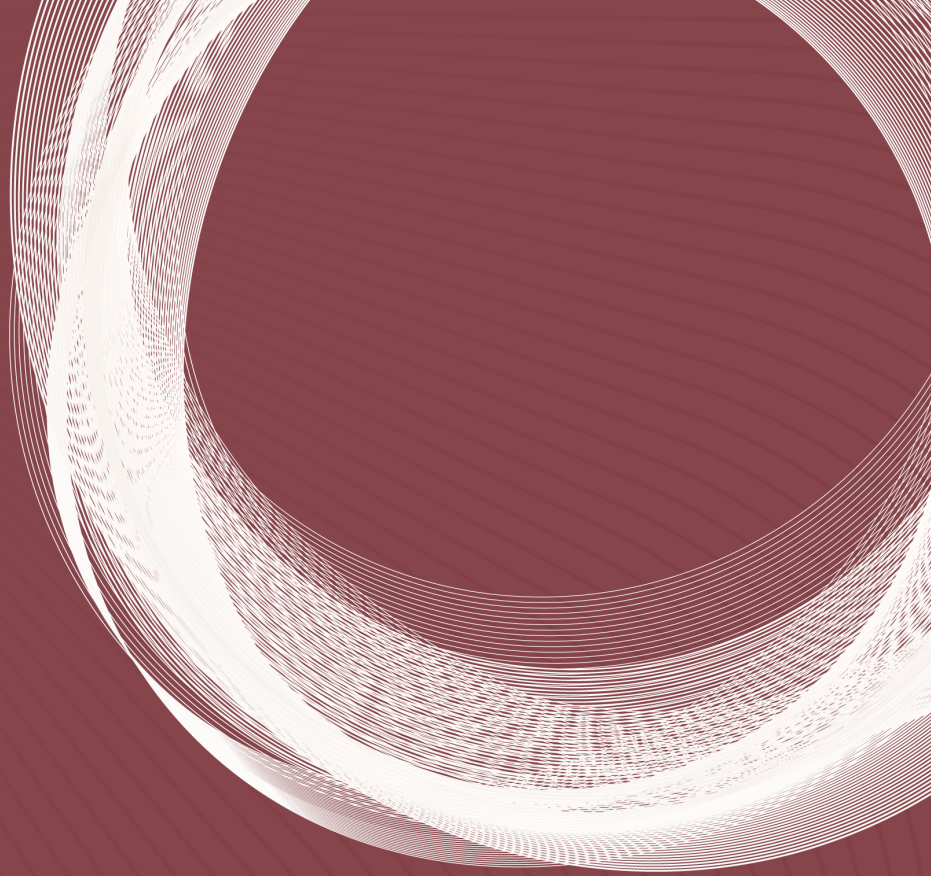
We believe that the statements made in this report are accurate, but no warranty of completeness, accuracy, or reliability is given in relation to the statements and representations made by, and the information and documentation provided by the Department of Employment and Workplace Relations. We have not attempted to verify these sources independently unless otherwise noted within the report.

We have not been engaged provide any legal advice or interpretation of law and legal opinions, and our report should not be relied upon as legal advice.

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Review Artefacts

The analysis, findings and outcomes of the 2025 Independent Review of the Targeted Compliance Framework (the Review) conducted by Deloitte are reported on in two main artefacts.

This Statement of Assurance is supported by the comprehensive Final Report document.



Statement of Assurance



Final Report

1. Purpose and Scope

1.1 Purpose

This Statement of Assurance outlines the findings and conclusions of the Independent Review into the design, implementation, and operation of the Targeted Compliance Framework (TCF).

The purpose of this Statement is to set out key findings and identified contributing factors and root causes of observed deficiencies, with reference to applicable legislation, policy, departmental records, technical briefings, and stakeholder interviews in direct response to the scope and agreed methodology for the Review.

It is supported by the comprehensive Final Report.

The Statement of Assurance reflects the evidence reviewed and analysed by the Review team and incorporates qualitative and quantitative insights drawn from documentation, interviews, technical artefacts, literature reviews, and policy analysis.

The following procedures and sources of evidence were used in the development of the analysis and findings of the Review, and this Statement (greater detail is included within the Final Report):

- Review of relevant legislative and policy instruments, including Division 3AA of the *Social Security (Administration) Act 1999* (Cth), associated subordinate legislation, and departmental guidelines¹
- Technical evaluation of the TCF's IT system and review of relevant architectural and logic artefacts
- Analysis of program documentation including operational policies, business rules, and governance artefacts
- Interviews with technical, policy and assurance staff within the Department of Employment and Workplace Relations (DEWR)
- Benchmarking against comparable large-scale IT-enabled compliance programs in other Australian and international government agencies; and
- Review of academic literature on administrative law, automation in public decision-making, and regulatory theory.²

1.2 Scope and Methodology

This Statement of Assurance is framed against the scope of work agreed upon for the Review with the Department and addresses the following elements:

- a) The effectiveness of operational policy, business rules and IT support systems in delivering the TCF consistently with relevant social security law and government policy
- b) High risks within the program or IT system that require urgent departmental action or remediation
- c) The relative performance, availability and functionality of the TCF's IT system, benchmarked against other large and complex public sector systems
- d) The adequacy of governance and assurance arrangements for the program, assessed against established industry benchmarks and principles of better practice; and
- e) Preliminary recommendations structured into two categories: non-system changes and system changes.

¹ See as examples, *Social Security (Administration) Act 1999* (Cth) pt 3 div 3AA; *Social Security (Administration) (Non-Compliance) Determination 2018* (No 1) (Cth); Department of Social Services (Cth); *Social Security Guide* (Version 1.329, 12 May 2025) <https://guides.dss.gov.au/social-security-guide>.

² See, eg, Lisa Burton Crawford, *The Rule of Law and Administrative Justice in the Welfare State: A Study of Centrelink* (Federation Press, 2021); Terry Carney, 'The New Digital Future for Welfare: Debts Without Legal Proofs or Moral Authority?' (2018) 44(2) *Monash University Law Review* 376.

2. Overview of the TCF

2.1 Overview of the TCF as an Integrity Measure

The Targeted Compliance Framework (TCF) was introduced by the Australian Government in 2018 as a new approach to managing non-compliance with mutual obligations under the *Social Security (Administration) Act 1999* (Cth). The TCF replaced the previous Job Seeker Compliance Framework (JSCF) for most participants, with the stated aim of improving fairness, transparency, and engagement outcomes by applying a more tailored and risk-based approach to compliance.³

The concept of mutual obligations for those in receipt of social security benefits related to unemployment has formed a part of the social security system since 1945.⁴ This policy reflects a reciprocal model of social security, where income support is provided on the condition that people in receipt of payments are actively looking for work and participating in activities that support them into employment.⁵

The TCF's compliance model is structured to deliver two primary integrity outcomes in alignment with the reciprocal social security model:

Positive Assurance
Ensuring welfare payments are made to participants who meet their mutual obligations, positively assuring people that commitment leads to benefit and fostering trust in the welfare system.
Negative Assurance
Ensuring income support payments are withheld from participants who do not comply with mutual obligations, providing public assurance that welfare funds are disbursed only to eligible recipients meeting legislative and policy requirements.

Table 1: TCF Integrity Outcomes

By providing assurance of these two outcomes, the TCF functions as an integrity mechanism within the social security system, ensuring that payments are delivered to individuals who meet their obligations and appropriately withheld from those who do not.

2.2 Operation of the TCF

Under Mutual Obligation Framework requirements, job seekers are expected to complete practical tasks and activities, such as attending appointments and interviews, undertaking job search activities, or participating in training or work programs.

Participants' mutual obligation requirements are generally determined by certain factors which include age, assessed work capacity, and the primary responsibility for the care of a child. These are further varied for participants assessed as having part-time mutual obligation requirements, including those with a partial capacity to work, principal carer responsibilities, early school leavers, and those in receipt of Special Benefit.

Mutual Obligation provisions also accommodate a range of exemptions including, but not limited to, temporary incapacity, special circumstances, pregnancy-related exemptions, bereavement, and rehabilitation participation.⁶

If these obligations are not met, the TCF applies a graduated series of responses, with demerit points, penalties, and payment suspensions that are used to manage non-compliance. The Framework is intended to distinguish between intentional and unintentional breaches and to provide opportunities for job seekers to reset their compliance history through periods of good behaviour.⁷

In line with contemporary regulatory and compliance practice, where a participant is new to employment services or they miss an obligation for the first time, compliance action is not applied.

³*Social Security (Administration) Act 1999* (Cth) s 42UC–42UO.
⁴*Unemployment and Sickness Benefits Act 1944* s15(c)(ii).
⁵Peter Whiteford, 'Mutual Obligation and the Social Security System' (2003) 58(2) *Australian Journal of Social Issues* 127, 129 Department of Social Services (Cth), Guide to Social Security Law, 3.11 Mutual Obligations, (Web Page 3 June 2024) <https://guides.dss.gov.au/social-security-guide/3/11/5>.
⁶Department of Social Services (Cth), Guide to Social Security Law, 3.11.5 Exemptions, (Web Page, 3 June 2024) <https://guidesdss.gov.au/social-security-guide/3/11/5>.
⁷Department of Education, Skills and Employment, *Targeted Compliance Framework Overview* (2018) 2–3.

2. Overview of the TCF

2.2 Operation of the TCF (cont.)

Instead, participants are reminded via a ‘nudge’ message regarding their obligations which includes information to help them understand their obligations, how to fulfil those obligations, and what to do if they are unable to meet them for any reason.

Where a participant fails certain core requirements, such as attending their first appointment with their employment service provider, or they fail to agree their Job Plan on time, the TCF will automatically apply.

To implement this policy structure, the TCF is underpinned by a predominately automated, large-scale IT system that relies on programmatic rules, provider-entered compliance reports and system-triggered decisions.

2.3 Targeted Compliance Framework Zones

To assess compliance, the TCF categorises participants based on their engagement and conformity with the Mutual Obligation Framework. As seen in *Table 2: Compliance Zones*, all participants begin in the Green Zone, remaining there if they fulfil their obligations. Non-compliance leads to progression into the Warning Zone, where demerit points are applied, and continued failures may result in entry to the Penalty Zone, where financial penalties, including payment reductions and cancellations, may be enforced.

This structured approach balances accountability while providing opportunities for participants to re-engage before facing severe penalties.

Targeted Compliance Framework Zones

Compliance Zones	Green Zone (Starting Point)	Warning Zone	Penalty Zone
Zone overview	The participant is meeting requirements.	The participant has five or fewer non-compliance events – “demerits” – in six months.	The participant is “persistently and wilfully non-compliant” per Legislative Instrument.
Obligation implications	<p>If the participant misses an obligation, their payment may be suspended and if they do not provide a valid reason, the participant accrues a demerit point.</p> <p>This results in a transition of the participant from the Green Zone into the Warning Zone.</p>	<p>Where a participant is in the Warning Zone, their demerit points remain valid for 6 months, after which they expire.</p> <p>For a participant to transition to the Green Zone, the participant is required to meet all their mutual obligations until the expiry of their demerits.</p> <p>A capability interview and capability assessment must be conducted, with the capability interview after 3 demerits and capability assessment after 5 demerits. The participant cannot accrue further demerits until the capability review has been finalised.</p>	<p>When a participant is in the Penalty Zone, Services Australia assesses whether a financial penalty should apply based on non-compliance reports submitted by the provider. The investigation is carried out by Services Australia employees.</p> <p>If a participant remains compliant for 3 months, they return to the Green Zone with no demerits.</p> <p>If non-compliance occurs:</p> <ul style="list-style-type: none">• First failure – 1 week’s payment is lost (50% reduction of fortnightly payment);• Second failure – 2 weeks’ payment is lost (100% reduction of fortnightly payment);• Third failure – payment is cancelled, a 4-week preclusion period applies, and the participant must reapply for income support.

Table 2: Compliance Zones

2. Overview of the TCF

2.4 Core Features of the TCF

The TCF was designed to simplify previous mutual obligation compliance approaches and focus compliance effort and activity on participants who are wilfully non-compliant or genuinely not looking for work. It also introduced an early model of *Responsive Regulation*⁸, embedding measures that are aimed at providing protection for vulnerable participants to assist them to meet their obligations.

The table opposite outlines the core features which demonstrate this initial compliance and regulatory design approach.

Core Features	Description
Demerit Point System	Participants accrue demerits for non-compliance. A warning or reminder is issued initially. If demerits accumulate, more serious consequences follow.
Capability Assessments and Interviews	Once participants accrue a certain number of demerits, the system is meant to trigger a review of their personal circumstances and capability to comply. ⁹
Graduated Penalties	After accruing five demerits in six active months and deeming existing requirement capability within two separate capability review points, participants enter the "Penalty Zone". Further breaches in the penalty zone result in the application of penalties. The first penalty resulting in one week's loss of payment, the second penalty resulting in two weeks' loss of payment and the third penalty resulting in payment cancellation and a four-week preclusion period. ¹⁰
Reset Periods	Participants demonstrating compliance can "reset" their record, preventing progression to more serious consequences.

Table 3: Core Features of the TCF

2.5 TCF Components

The TCF is an integrated program, comprised of a suite of legislative and policy instruments, supported by administrative processes, employment service provider activity, and a dedicated IT system that operationalises automated compliance decision-making at scale.

Specifically, these components include:

- Legislation and Ministerial Policy:** Establishing the overarching legal obligations, criteria for determining persistent non-compliance, and conditions for penalties.
- Operational Policy and Guidance:** Interpreting and applying legislative requirements through departmental guidelines and procedures.

- Employment Service Providers:** Engaging directly with participants, managing individual cases, and reporting participant compliance data back to the department.
- Departmental Governance and Assurance:** Overseeing compliance operations, ensuring legislative adherence, and addressing participant and systemic issues.
- Dedicated IT System:** Automating compliance decisions based on integrated business rules and data provided by employment service providers.

References to the 'Framework' or 'TCF' in this Statement refer to the integrated program as a whole, including the supporting IT system.

⁸John Braithwaite, *Regulatory Capitalism: How It Works, Ideas for Making It Work Better* (Edward Elgar, 2008) 96–102.
⁹Senate Community Affairs References Committee, *Jobactive: Failing Those It Is Intended to Serve* (Report, February 2019) 24–26.
¹⁰Department of Social Services, *Mutual Obligation Requirements and the Targeted Compliance Framework* (Factsheet, 2020).

2. Overview of the TCF

2.6 Overall statistics of the TCF

Whilst exact monthly participant figures vary, statistical analysis demonstrates the magnitude of TCFs operations.

For the final quarter of 2024, the outcomes of the TCF for Employment Programs (excluding DES) were specifically evaluated to assess their impact on participants¹¹:

- **641,135** participants were subject to mutual obligation requirements each month from October to December 2024.¹²
- **Payment suspensions** were issued to **30.4%** of cases; approximately 194,670 individuals over the quarter, or on average, 48,667 per month.¹³
- **Demerits** were applied to **30.1%** of cases; approximately 192,915 individuals over the quarter, or 48,228 per month¹⁴; and
- **Payment Cancellations** occurred in 45 cases; representing less than **0.1%** of participants.¹⁵

Note; refer to 3.2.3 for details in relation to cancellations in this dataset.¹⁶

It is important to note that these figures are not mutually exclusive, meaning that an individual participant case may belong to more than one outcome at any given time. For example, participant cases ordinarily accumulate demerit points may also be subject to payment suspension or cancellation.

ACOSS reported in their analysis that more than 85% of all compliance actions (demerit points, payment suspension or cancellation) were initiated by provider-led services, highlighting the level of discretion available to employment service providers in the application of compliance penalties, but also the degree to which the TCF could be applied inconsistently between participants.

Consequently, the integrity of TCF outcomes relies heavily on accurate system design, robust and clearly documented governance, effective quality assurance, and alignment with legislative and policy intent. Any flaws or gaps in these foundational components introduce the risk of systemic failures, inappropriate compliance decisions, and adverse participant impacts.

Figure 1: Compellable Flow Caseload by Employment Services Program for the Period 1 October 2024 to 31 December 2024



Note: Compliance actions are part of a progressive process, and participants may be subject to multiple actions over time (e.g. demerits → suspension → cancellation). These categories are therefore not mutually exclusive. There are inconsistencies within the “Targeted Compliance Framework Public Data – October to December 2024” dataset, including variations in the reported totals for the compellable caseload.

¹¹Department of Employment and Workplace Relations (Cth), Targeted Compliance Framework Public Data: October-December 2024, 2025, <https://www.dewr.gov.au/employment-services-data/resources/tcf-public-data-october-december-2024>.

¹²Ibid.

¹³Ibid.

¹⁴Ibid.

¹⁵Ibid.

¹⁶Department of Employment and Workplace Relations, Workforce Australia Caseload Time Series - October 2022 to March 2025 (Report, 17 April 2025) <https://www.dewr.gov.au/employment-services-data/resources/workforce-australia-caseload-time-series-october-2022-march-2025>.

3. Assessment

3.1 Assessment Overview

The Review undertook a comprehensive examination of the Targeted Compliance Framework (TCF), assessing its alignment with legislative and policy intent, the integrity and functionality of the supporting IT system, governance and assurance arrangements, and the overall design and maturity of the compliance model.

The following sections detail the findings and assurance assessment of the Review against each scope item:

3.2 IT System Functionality and Decision Integrity

The Review examined the performance and functionality of the IT system supporting the TCF, and the integrity of decisions generated through its operation. Three primary areas of concern were identified in relation to the system's design and implementation:

3.2.1. Design Degradation and System Administration

Since its introduction in 2018, the TCF IT system has undergone repeated and iterative modification to accommodate legislative and policy changes, as well as to address emerging technical and operational issues.¹⁷

While such adaptations, particularly at short notice, are not uncommon in public sector service delivery environments, the changes made to the TCF system have not been guided by a unified system development strategy aligned to its original architectural design and have frequently relied on non-standard programming and 'e-fix' coding approaches.¹⁸

The Review acknowledges that this disjointed approach has been influenced, in part, by externally imposed financial constraints, including the absence of a dedicated sustainment budget to support the ongoing development and maintenance of core system functionality. However, these constraints do not fully account for the extent of technical degradation observed.

The degradation has been exacerbated by the widespread use of unconventional technical practices; most notably the frequent application of hard-coded fixes to implement system changes. These practices have bypassed the system's intended rules-based engine design, resulting in the accumulation of thousands of lines of duplicative, conflicting, and unnecessarily complex code. Consequently, the IT system has progressively diverged from its original design intent and architectural foundation.

The code base is now excessively convoluted, difficult to manage, and lacks architectural integrity. In the absence of a comprehensive design register or traceability map, any modification necessitates extensive manual intervention across multiple databases and workflows. This approach is labour-intensive and high-risk, increasing the likelihood of system instability and unintended impacts on participant case outcomes.

3. Assessment

3.2.2. Erroneous Case Processing

The Department identified and published three distinct incidents relating to the IT system's processing of participant cases that were acknowledged to have adversely affected participants.¹⁹ These events, referred to in departmental communications as 'IT Defect Issues'²⁰, were identified between July 2023 and May 2024 and collectively impacted at least 1,326 participants.²¹

The Review considered these incidents as part of its assessment of the IT system's performance and functionality, with a particular focus on whether the issues arose from technical faults, system instability, or other causes.

Upon analysis of the evidence, the Review found the terminology 'IT defect' to be imprecise. Two of the three incidents did not stem from technical faults or software bugs within the system's architecture or codebase. Instead, they were determined to be latent design flaws, embedded during the original 2018 system development due to the inadequate translation of program intent and policy rules into system logic.

In these identified instances, the IT system's code was functioning as originally designed and implemented, despite producing adverse participant outcomes.

Paradoxically, this finding increased confidence in the system's technical stability, while concurrently reducing confidence in the appropriateness and integrity of its embedded compliance logic.

The third incident, Issue 2 (February 2024)²², was inadvertently introduced into the production environment by the Department while remediating Issue 1 (July 2023).²³ The Review attributed the root cause of this incident to underlying problems with *Design Degradation and System Administration* and the Department's adherence to its own regression testing policies and procedures. The highly irregular and complex codebase has rendered the system increasingly vulnerable to adverse impacts from ongoing iterative change.

Based on these findings, there is an increased likelihood that further amendments to the existing codebase will result in greater incidences of erroneous case processing and decision-making by the system.

IT Defect Issues ¹⁹		
Date	Issue	Impact
Issue 1 July 2023	Two discreet defects identified within the IT system had operated undetected since the TCF's introduction in July 2018. These defects incorrectly applied demerits, payment suspensions, and cancellations without the required legislative or policy justification.	1,165 participants
Issue 2 February 2024	During remediation efforts to correct Issue 1, departmental technical teams introduced an additional defect into the production environment. This resulted in further incorrect application of financial penalties.	73 participants
Issue 3 May 2024	A separate logic flaw incorrectly progressed participants into compliance action, even in circumstances where the fifth demerit point had been removed, and a Capability Assessment was pending. This resulted in compliant participants being routed into penalty phases contrary to policy.	88 participants

Table 4: IT System Defects

¹⁹Department of Employment and Workplace Relations (Cth), *Secretary's Opening Statement* (26 February 2025) <https://www.dewr.gov.au/assuring-integrity-targeted-compliance-framework/announcements/secretarys-opening-statement>.

²⁰*Ibid.*

²¹*Ibid.*

²²*Ibid.*

²³*Ibid.*

3. Assessment

3.2.3. Invalid Case Determinations

The legal analysis or assessment of individual case processing, determinations, or outcomes is outside the scope of this Statement. Accordingly, all observations made are limited to the operationalisation of legislation and policy within the TCF and do not constitute an assessment of the legal validity or correctness of individual decisions under the governing legislation.

The Review considered detailed documentation provided by the Department, including policy and operational guidance materials that reference relevant statutory requirements for case assessment and discretionary decision-making.²⁴ However, the operational implementation of the framework, particularly as automated through the IT system, was found to be in material conflict with these requirements. The Review observed specific structural concerns, related to 3.2.2, which include design flaws such as the inadequate translation of statute and policy intent into the IT system, including defects in system workflows and logic that ignore statutory requirements for discretionary decision-making.

Under the *Social Security (Administration) Act 1999* (Cth), several provisions require that the Secretary or their delegate make an active determination before compliance action is applied to a participant. Despite this, the Review found no evidence that the capacity for discretionary decision-making functionality was embedded in the system or that it was subsequently disabled. Rather, the system appears to have been configured to fully automate decision-making across the participant caseload.

On 21 March 2025, the Secretary published a statement outlining a series of decisions to pause determinations under certain legislative provisions, citing concerns that the IT system was not ‘operating in alignment with the law and policies’²⁵, or that ‘Decision making in this area needs to be well-considered and robust as possible, taking into account the other aspects of the Mutual Obligations Framework’²⁶:

Departmental Determinations

Date	Decision	Statutory Provision
4 July 2024	The Secretary paused cancellations due to persistent mutual obligation failures	Section 42AF(2)(d) Social Security (Administration) Act 1999
24 September 2024	The Department paused cancellations for failure to meet a reconnection requirement within 4 weeks	Section 42AM Social Security (Administration) Act 1999
5 March 2025	The Secretary paused cancellations resulting from unemployment failures	Section 42AH Social Security (Administration) Act 1999
6 March 2025	The Secretary paused reductions resulting from persistent mutual obligation failures	Section 42AF(2)(c) Social Security (Administration) Act 1999

Table 5: Decisions by the Department to pause social security cancellations and reductions delivered by the TCF (2024-2025)

The Review determined that the specific absence of discretionary functionality and system-level misalignment with statutory requirements as outlined above further prevents the provision of assurance regarding the operation of the IT system or the integrity of the decisions it produces.

²⁴Review documentation supplied, ED1, ED6, ED36 (held on file).
²⁵Department of Employment and Workplace Relations (Cth), *Assuring the Integrity of the Targeted Compliance Framework* (Web Page, 16 May 2025) <https://www.dewr.gov.au/assuring-integrity-targeted-compliance-framework>.
²⁶Department of Employment and Workplace Relations (Cth), *Secretary's Statement – 21 March 2025* (Web Page, 21 March 2025) <https://www.dewr.gov.au/assuring-integrity-targeted-compliance-framework/announcements/secretarys-statement-21-march-2025>.

3. Assessment

3.2.4 Continued Invalid Case Processing

On 24 September 2024, an administrative decision was made by a departmental delegate to pause decisions to cancel people's social security payments as a result of not meeting a 'reconnection requirement' within four weeks under s 42AM of the *Social Security (Administration) Act 1999* (Cth).²⁷

This decision was made after it was identified that the IT system was not operating in alignment with the law and policies. In turn, the Department publicly stated:

'The Department immediately implemented processes to stop these cancellations from occurring. These decisions remain paused while we take steps to review, improve and better assure that our processes are operating as they should.'²⁸

This action by the Department, however it was to be implemented, should have ensured that there were no further cancellations under s 42AM of the *Social Security (Administration) Act 1999* (Cth). Necessary controls, assurance and testing should have also operated to provide additional confidence that this decision was fully enforced, given the inherent risks present in the IT system.

However, despite the decision and its subsequent enactment, the Department confirmed to the Review that a further 45 participants had their payments cancelled when they should not have. These cancellations are reported within the *Targeted Compliance Framework Public Data: October – December 2024*.²⁹

In response to a request from the Review, the Department advised that the issue had arisen due to errors in its internal processes. The Department further stated that it had implemented remedial actions, including enhanced daily manual assurance and monitoring measures.

While the Review acknowledges that the Department's internal governance arrangements ultimately identified the issue, they were insufficient to prevent the realisation of adverse impacts on participants.

This matter underscores the identified deficiencies in the Department's governance and assurance arrangements for the TCF, including the lack of multi-method approaches to risk mitigation. Critically, at the time of this incident, insufficient controls existed to prevent automated compliance processing in conflict with a revised policy position.

²⁷Department of Employment and Workplace Relations (Cth), Decision to Pause Cancellations of People's Social Security Participation Payments for Not Meeting a 'Reconnection Requirement' within 4 Weeks (Web Page, 16 May 2025) <https://www.dewr.gov.au/assuring-integrity/targeted-compliance-framework/decision-pause-cancellations-peoples-social-security-participation-payments-not-meeting-reconnection>

²⁸ibid.

²⁹Department of Employment and Workplace Relations, Workforce Australia Caseload Time Series - October 2022 to March 2025 (Report, 17 April 2025) <https://www.dewr.gov.au/employment-services-data/resources/workforce-australia-caseload-time-series-october-2022-march-2025>

3. Assessment

3.2.5 Summary of IT System Assessment

The Review identified material concerns across four key areas of the IT system:

- Design Degradation and System Administration, including the absence of a unified system development strategy, extensive use of hard-coded fixes, and increasing technical instability
- Erroneous Case Processing, with confirmed adverse participant impacts arising from latent design flaws and unanticipated consequences of iterative system changes
- Invalid Case Determinations, where system logic has been configured in a manner inconsistent with statutory requirements to support discretionary decision-making by authorised delegates
- Continued Invalid Case Processing, where the Department is unable to fully effect the policy decisions in relation to the Framework

Although the system remains functionally stable in executing programmed logic, the Review finds that this logic is misaligned with legislative and policy intent. The cumulative effect of these deficiencies materially impairs the department's ability to demonstrate that participant compliance decisions are made in accordance with the *Social Security (Administration) Act 1999* (Cth) and relevant policy settings.

➤ The Review determined that, as at the time of assessment, assurance cannot be provided in relation to the integrity, effectiveness, or appropriateness of decisions produced by the TCF IT system in its current form.

3.3 Legislative and Policy Alignment

The Review established that there is an absence of alignment and documented traceability between the fundamental components of the Targeted Compliance Framework, including statutory provisions, operational policies and guidance, and the logic embedded within the supporting IT system. The business rules that govern automated compliance actions under the TCF do not demonstrably reflect, nor are they traceably linked to, the preconditions and tests set out in legislation or policy.

In particular, the Review found that in certain circumstances, automated compliance action is progressed without documented human assessment or validation, or evidence of the satisfaction of mandatory legislative requirements. These include discretionary determinations as to whether participant non-compliance was intentional, persistent, or whether a reasonable excuse existed; tests which are expressly required under the *Social Security (Administration) Act 1999* (Cth) prior to the imposition of compliance sanctions.

Further, the Review concluded that the current business rules documented by the department, and implemented within the IT system, are not an accurate representation of program rules established by statute and government policy and are worsened by the absence of distinction between programmatic rules and those that purely enable IT system functionality.³⁰ The current rules risk subjecting participants to unjust or excessive processes or obligations and degrade direct comparison to legislation and policy.

➤ Based on the evidence available, assurance cannot be provided in relation to the integrity, effectiveness, or appropriateness of operational policy and business rules in delivering the TCF in line with relevant policy and social security law. Current practices risk generating ultra vires outcomes and increase risks associated with external scrutiny.

³⁰Review documentation supplied, ED75, ED76 (held on file).

3. Assessment

3.4 Governance and Assurance Effectiveness

Governance and assurance are integral to effective risk management in large-scale public programs.³¹ When embedded appropriately, these functions operate in concert with program controls to reduce the likelihood of defective outcomes, misapplication of, or misalignment with legislation, and the corruption of supporting IT systems.

In contrast to other large-scale public sector compliance and regulatory programs, and contrary to the principles outlined in the Commonwealth Risk Management Policy, the governance and assurance measures supporting the Targeted Compliance Framework do not adequately implement a ‘three lines of defence’ risk management model.³² As a result, the framework lacks the structural safeguards necessary to prevent actual or perceived adverse outcomes for participants, protect public confidence, or to maintain the veracity and integrity of Australia’s welfare system.

Current governance and assurance arrangements accompanying the TCF are disjointed and reactive. There is no enforced process for the systematic review or validation of individual case decisions, nor are there defined timeframes to ensure transparency, accountability, or procedural fairness. These deficiencies increase the risk of inconsistent or inequitable application of program rules and discretionary powers across participant cohorts.

In addition, existing arrangements significantly constrain the Department’s ability to respond to and justify individual decisions when subject to external scrutiny by the Commonwealth Ombudsman³³, Administrative Appeals Tribunal³⁴, or the Courts.

These weaknesses are compounded by the absence of a centralised governance function with end-to-end responsibility for monitoring

the cumulative impact of policy and IT system changes.³⁵ Without consolidated oversight, systemic risks may go undetected, and compliance operations remain exposed to deviation from legislative and policy intent.

Based on the procedures undertaken and the evidence reviewed, the Review finds that the governance and assurance structures supporting the TCF are insufficient to manage risk, maintain administrative integrity, or ensure equitable participant outcomes.

The absence of a consolidated governance function, the lack of systematic case validation processes, and the absence of a comprehensive ‘three lines of defence’ model undermine the Department’s capacity to oversee, monitor, and continuously improve the framework.³⁶

➤ The Review determined that, at the time of assessment, assurance cannot be provided in relation to the adequacy, effectiveness, or responsiveness of the governance and assurance arrangements in place to support the TCF. Current arrangements are insufficient to mitigate inherent risk, support transparency, or suitably control the delivery of the framework.

3.5 Benchmarking and Regulatory Maturity

In contrast to comparable Australian Government compliance and regulatory programs, the TCF’s compliance model has not evolved or matured since its introduction to maintain consistency with contemporary compliance and regulatory principles. It lacks the risk-based proportionality and participant-centred design evident in analogous frameworks used by the Australian Taxation Office, Australian Border Force, and the NDIS Quality and Safeguards Commission.³⁷

³¹Joint Committee of Public Accounts and Audit, *Report 505: Inquiry into Policy and Program Design and Implementation* (Parliamentary Paper No 505, 2023) 54–56.

³²Department of Finance (Cth), *Commonwealth Risk Management Policy* (Policy Document, July 2014) <https://www.finance.gov.au/government/comcover/commonwealth-risk-management-framework>.

³³*Ombudsman Act 1976* (Cth) s 5(1)(b).

³⁴*Administrative Review Tribunal Act 2024* (Cth) s 9; *Administrative Review Tribunal (Consequential and Transitional Provisions No. 1) Act 2024* (Cth) sch 1.

³⁵Review interview record, MR05, MR09, MR18 (held on file).

³⁶Department of Finance (Cth), *Commonwealth Risk Management Policy* (Policy Document, July 2014) <https://www.finance.gov.au/government/comcover/commonwealth-risk-management-framework>.

³⁷Australian Taxation Office, *Justified Trust Program Overview* (2022); Australian Border Force (Cth), *Australian Trusted Trader* (Web Page, 22 September 2024) <https://www.abf.gov.au/about-us/what-we-do/trusted-trader>; NDIS Quality and Safeguards Commission, *Compliance and Enforcement Policy* (2021).

3. Assessment

3.5 Benchmarking and Regulatory Maturity (Cont.)

The current TCF model is structured around a punitive assumption of non-compliance, applies uniform escalation of compliance action irrespective of participant history or context, and lacks procedural protections or alternate pathways for vulnerable participants. Whilst capability interviews and assessments are intended to prevent the escalation of compliance action without consideration of participant circumstances, there are limited controls to ensure this. Technical interviewees and code analysis established that the IT system is not configured to incorporate vulnerability indicators in assessment and contains only limited procedural fairness checkpoints.³⁸

Inbuilt safeguards, including robust controls to ensure the completion of a capability assessment as required by statute, were not fully effective or present to prevent participants with identified case complexities or vulnerabilities from automatically progressing to automated compliance action.

Research demonstrates that individualisation and compliance model adaption to complex cases and indicators, improves participant engagement and trust whilst simultaneously improving regulatory outcomes.³⁹ In limited response to this, the current operational version of the TCF attempts to entirely account for and automate every variation of a participant's case or personal circumstances within the IT system. However, does so without dedicated or specialist support for the individual.

Whilst the adaption of the framework to support individualisation and increasingly cater for personal or complex circumstances should be encouraged and pursued, the current

methodology employed risks creating additional processing irregularities, added IT system complexity, and does not accurately interpret regulatory and compliance better practice.

Other Australian Government compliance models utilise large IT systems to deliver basic and low-vulnerability caseload processing, and place greater emphasis on human case management to respond to complex participant needs. This concept, sometimes referred to as 'digital first, but not digital only', emphasises prioritising digital channels while maintaining traditional, non-digital avenues to ensure inclusivity and accessibility.⁴⁰ This approach is particularly relevant in regulatory and compliance contexts, where diverse stakeholder needs must be met.

The current methods of responding to complex case factors or vulnerability within the TCF do not provide sufficient weight to the benefits of human case assessment and interaction to improve participant engagement, nor are they an additional measure in a 'three lines of defence' model to further reduce the risk of flawed case outcomes.⁴¹

➤ The Review determined, in contrast to comparable public sector programs, the near-exclusive reliance of the TCF on automated IT system processing, particularly in response to complex or vulnerable cases, is not reflective of contemporary practice or theories.

³⁸Review interview records, MR18, MR22 (held on file).

³⁹Christopher Hodges, 'An Introduction to Outcome Based Cooperative Regulation (OBCR)' (SSRN Scholarly Paper ID 4031491, 1 February 2022) <https://ssrn.com/abstract=4031491>; NSW Productivity Commission, 'Guidance for Regulators to Implement Outcomes and Risk-Based Regulation' (Report, October 2016) https://www.productivity.nsw.gov.au/sites/default/files/2018-05/Guidance_for_regulators_to_implement_outcomes_and_risk-based_regulation_October_2016.pdf; Generis, 'The Role of Stakeholder Engagement in Enhancing Compliance Strategies' (Web Page, 2024) <https://generisonline.com/the-role-of-stakeholder-engagement-in-enhancing-compliance-strategies/>.

⁴⁰Digital First Doesn't Equal Digital Only, Forbes (online, 8 June 2021) <https://www.forbes.com/councils/forbesfinancemagazine/council/2021/06/08/digital-first-doesnt-equal-digital-only/>; 'Digital-first, but not digital-only, approach adopted', The Straits Times (online, 6 November 2024) <https://www.straitstimes.com/opinion/forum/forum-digital-first-but-not-digital-only-approach-adopted>; 'Why 'digital-first' should not mean 'digital-only'', The Business Times (online, 3 November 2023) <https://www.businesstimes.com.sg/companies-markets/banking-finance/future-finance-2023/why-digital-first-should-not-mean-digital-only>.

⁴¹Department of Finance (Cth), *Commonwealth Risk Management Policy* (Policy Document, July 2014) <https://www.finance.gov.au/government/comcover/commonwealth-risk-management-framework>.

4. Urgent Interventions

4.1 High Risks Requiring Urgent Remediation

The Review was explicitly requested to identify areas of higher risk requiring urgent action or remediation.

➤ In response, the Review recommends, as an urgent priority, the Department:

1. Initiate measures to prevent the IT system from communicating participant payment cancellations to the Services Australia IT environment where the Secretary or their delegate has made a determination to pause or cease such compliance action.
2. Limit or suspend any further modification to the base system code without reference to an overarching architecture or system plan to constrain the risk of further disruptions to, or corruption of, the compliance program, the introduction of additional defects into the production platform, or the overall loss of TCF functionality through technical failure or a loss of processing integrity that compels a decision to suspend its operation.

However, the Review recognises the essential nature of business continuity for the TCF and recommends where changes to the platform are necessitated by policy or legislative change, the department:

- a) Limit system changes to only those considered strictly essential to maintain compliance with legislation and policy directions, obligations, and authority.
- b) Confirm any planned changes are thoroughly assessed by policy, legal and technical authorities to ensure legislative and policy compliance and anticipated outcomes are maintained; and

- c) Ensure planned changes are, from a technical perspective.
 - i. clearly and thoroughly documented and well understood.
 - ii. made in accordance with the department's protocols supporting changes to a production environment.
 - iii. Are extensively tested using the department's regression testing procedures; and
 - iv. Supported by sufficient facsimiles of the current production version which are stored to support the failover or immediate reversion to the last known functional version of the platform in the event of further defects.
- d) Specifically, and expressly increase assurance activity to monitor any participant cases affected by the system changes that are not erroneously processed or result in an inequitable outcome.
3. Continue and strengthen its current internal assurance program, including directing the systematic review of all negative case determinations and outcomes processed by the IT system to ensure such results are supported by appropriate evidence and consistent with legislative and policy authority.

5. Limitations

5.1 Limitations

This Statement of Assurance is based on the information, documentation, and access provided to the Review at the time of preparation. Limitations include restricted visibility over legacy code, the absence of full documentation for system decision logic, and the inability to access or validate live system data. These constraints have been transparently noted within the body of the Review and factored into the level of confidence attributed to findings.

This Review is based on methodology agreed between the Department and Deloitte. The Services and this report are advisory in nature and are not an audit, consequently no opinions or conclusions are expressed under the Auditing and Assurance Standards Board's (AUASB) audit and assurance standards.

The legal analysis, review or assessment of individual case processing, determinations, or outcomes falls outside the scope of this Statement of Assurance. All observations and assessments made in connection to legislative provisions within this Statement are limited to the operationalisation of legislation and policy within the TCF and do not constitute a determination of the legal validity or correctness of individual or large-scale decisions under the governing legislation.

6. Conclusion

6.1 Conclusion

➤ Overall Assurance Determination

The Review is unable to provide assurance that, in its current form, the TCF reliably operates or delivers outcomes that are fully consistent with its legislative and policy objectives.

Despite this finding, it is important to note that the system processes over 640,000 participant cases on average per month.⁴² Over a five-year period, only 1,326 participants were confirmed to have been adversely affected by identified IT defects.⁴³ This figure does not include the additional 45 participants, identified by the Department, who are affected by the unsuccessful implementation of the decision to pause cancellations under s 42AM.

Nevertheless, the statistical analysis equates to a very low detected error rate of less than 0.01% in contrast to standardised human error rates in manual data processing environments of 5 – 6.5%, which does not justify the full suspension of the framework that the Department is legally obliged to deliver.⁴⁴

However, the persistence of these issues over an extended period, combined with the absence of comprehensive assurance, governance, and traceability mechanisms, demonstrates that existing controls are insufficient to prevent or detect systemic failures.

For this reason, the continued operation of the TCF must be supported by urgent, interim risk mitigations, tangible actions and strengthened assurance processes. These measures are required to uphold the integrity of the framework while more substantive reforms are progressed to embed legal alignment, fairness, and responsiveness in its design and delivery.

These changes, along with a series of longer-term recommendations for continued framework development and enhancement, are essential to re-establish the veracity of the TCF and restore public confidence in this important welfare system integrity measure.

⁴²Department of Employment and Workplace Relations, Workforce Australia Caseload Time Series - October 2022 to March 2025 (Report, 17 April 2025) <https://www.dewr.gov.au/employment-services/data/resources/workforce-australia-caseload-time-series/october-2022-march-2025>

⁴³Department of Employment and Workplace Relations (Cth), *Secretary's Opening Statement - Assuring the Integrity of the Targeted Compliance Framework* (Web Page, 26 February 2025) <https://www.dewr.gov.au/assuring-integrity-targeted-compliance-framework/announcements/secretarys-opening-statement>

⁴⁴Michael A Vasarhelyi and Miklos A Alles, 'The "Now" Economy and the Need for Continuous Assurance and Reporting' (2008) 22(2) *International Journal of Accounting Information Systems* 1, 3–4.

APPENDICES

The following appendices provide supplementary information and references used in the preparation of the Statement of Assurance.

A. Glossary

This glossary defines key terms used throughout the Statement of Assurance to support a consistent understanding of the Targeted Compliance Framework (TCF), its supporting systems, and related legislative and policy concepts.

Glossary	
<i>Term</i>	<i>Description</i>
TCF	The Targeted Compliance Framework (TCF) is a compliance system introduced by the Department to manage mutual obligation requirements for Workforce Australia and Disability Employment Services participants, aiming to address persistent or wilful non-compliance through a structured escalation model.
Participant	An individual receiving employment services or income support who is subject to mutual obligation requirements.
Compliance	The act of meeting obligations or requirements set out under policy, legislation, or program rules — in this context, relating to participation in employment services and activities.
IT System	The IT platform that operationalises the TCF by automating compliance processes, including business rule execution, participant status changes, and benefit determination outcomes.
System	The end-to-end operationalisation of the Targeted Compliance Framework.
Assurance	A process or set of practices aimed at providing confidence that the system and processes are functioning in line with legislative, policy, and operational expectations.
Legislation	Statutory instruments, such as the Social Security Act or Administration Act, govern the obligations, entitlements, and compliance processes for employment services participants.
Policy	Departmental rules, guidelines, or procedures are developed to implement legislative intent and govern how services and obligations are delivered and assessed.
Mutual Obligation	Requirements that participants must meet (e.g., attending appointments, job searching) to receive ongoing income support, as defined under social security law and related policy.
Governance	The frameworks and processes used to oversee, monitor, and manage the performance and compliance of programs and systems like the TCF.
Business Rule	A coded logic or decision point within the system that triggers specific outcomes (e.g., assigning demerit points) based on participant actions or inactions.
Delegate	A departmental officer or authorised decision-maker empowered to act on behalf of the Secretary under relevant legislation.
Warning Zone	A TCF compliance category for participants who have accumulated between 1 to 5 demerit points within six months, requiring them to demonstrate full compliance to return to the Green Zone.
Penalty Zone	Persistent and wilful non-compliance after the first applied penalty, not by virtue of being in the penalty zone and leading to payment suspensions or reductions.
Green Zone	The default compliance status under the TCF indicates a participant is meeting their mutual obligation requirements.
Debt	Compliance-related errors don't result in overpayment. Any debts incurred due to system processing would only occur in Services Australia's IT systems.
Benefit Cancellation	The termination of a participant's income support payment due to continued non-compliance under the TCF.
Demerit Point	A point assigned to a participant when they miss a requirement without valid reason; accumulation of demerit points can lead to progression through the compliance zones.
Reconnection	A process where a participant re-engages with their provider or obligations after non-compliance.

A. Glossary

This glossary defines key terms used throughout the Statement of Assurance to support a consistent understanding of the Targeted Compliance Framework (TCF), its supporting systems, and related legislative and policy concepts.

Glossary	
Term	Description
Suspension	The temporary halting of a participant’s payment due to a failure to meet obligations, pending re-engagement or resolution.
Administration Act	Refers to <i>Social Security (Administration) Act 1999</i> (Cth), the primary legislation that sets out eligibility, entitlements, and obligations for income support payments as well as the legislative basis for the TCF.
Social Security Act	Refers to <i>Social Security (Administration) Act 1999</i> (Cth), the primary legislation that sets out eligibility, entitlements, and obligations for income support payments as well as the legislative basis for the TCF.
Braithwaite's Methodology	A regulatory approach that underpins the TCF, based on responsive regulation and restorative justice principles. It promotes proportional responses to non-compliance, starting with support and escalating only when necessary, to encourage voluntary compliance and fair treatment of participants.

B. Reference List

Throughout the assurance statement, there is reference to a range of sources, supporting the analysis of the Targeted Compliance Framework (TCF) and its related systems, policies, and legislative concepts.

Reference List		
ID	Page(s) Found	Description
1	4	¹ See as examples, <i>Social Security (Administration) Act 1999</i> (Cth) pt 3 div 3AA; <i>Social Security (Administration) (Non-Compliance) Determination 2018</i> (No 1) (Cth); Department of Social Services (Cth); <i>Social Security Guide</i> (Version 1.329, 12 May 2025) https://guides.dss.gov.au/social-security-guide .
2	4	² See, eg, Lisa Burton Crawford, <i>The Rule of Law and Administrative Justice in the Welfare State: A Study of Centrelink</i> (Federation Press, 2021); Terry Carney, 'The New Digital Future for Welfare: Debts Without Legal Proofs or Moral Authority?' (2018) 44(2) <i>Monash University Law Review</i> 376.
3	5	³ <i>Social Security (Administration) Act 1999</i> (Cth) s 42UC–42UO.
4	5	⁴ <i>Unemployment and Sickness Benefits Act 1944</i> s15(c)(iii).
5	5	⁵ Peter Whiteford, 'Mutual Obligation and the Social Security System' (2003) 58(2) <i>Australian Journal of Social Issues</i> 127, 129; Department of Social Services (Cth), Guide to Social Security Law, 3.11 Mutual Obligations, (Web Page, 3 June 2024) https://guides.dss.gov.au/social-security-guide/3/11/5 .
6	5	⁶ Department of Social Services (Cth), Guide to Social Security Law, 3.11.5 Exemptions, (Web Page, 3 June 2024) https://guides.dss.gov.au/social-security-guide/3/11/5 .
7	5	⁷ Department of Education, Skills and Employment, <i>Targeted Compliance Framework Overview</i> (2018) 2–3.
8	7	⁸ John Braithwaite, <i>Regulatory Capitalism: How It Works, Ideas for Making It Work Better</i> (Edward Elgar, 2008) 96–102.
9	7	⁹ Senate Community Affairs References Committee, <i>Jobactive: Failing Those It Is Intended to Serve</i> (Report, February 2019) 24–26.
10	7	¹⁰ Department of Social Services, <i>Mutual Obligation Requirements and the Targeted Compliance Framework</i> (Factsheet, 2020).
11-15	8	¹¹ Department of Employment and Workplace Relations (Cth), <i>Targeted Compliance Framework Public Data: October-December 2024, 2025</i> , https://www.dewr.gov.au/employment-services-data/resources/tcf-public-data-october-december-2024 .
16	8	¹⁶ Department of Employment and Workplace Relations, <i>Workforce Australia Caseload Time Series - October 2022 to March 2025</i> (Report, 17 April 2025) https://www.dewr.gov.au/employment-services-data/resources/workforce-australia-caseload-time-series-october-2022-march-2025 .
17	9	¹⁷ See <i>Social Security Legislation Amendment (Streamlined Participation Requirements and Other Measures) Act 2022</i> (Cth); <i>Social Security Legislation Amendment (Technical Changes) Act 2025</i> (Cth).
18	9	¹⁸ Review interview records, MR18, MR22 (held on file).
19-23	10	¹⁹ Department of Employment and Workplace Relations (Cth), <i>Secretary's Opening Statement</i> (26 February 2025) https://www.dewr.gov.au/assuring-integrity-targeted-compliance-framework/announcements/secretarys-opening-statement .
24	11	²⁴ Review documentation supplied, ED1, ED6, ED36 (held on file).

B. Reference List

Throughout the assurance statement, there is reference to a range of sources, supporting the analysis of the Targeted Compliance Framework (TCF) and its related systems, policies, and legislative concepts.

Reference List		
ID	Page(s) Found	Description
25	11	²⁵ Department of Employment and Workplace Relations (Cth), <i>Assuring the Integrity of the Targeted Compliance Framework</i> (Web Page, 16 May 2025) https://www.dewr.gov.au/assuring-integrity-targeted-compliance-framework .
26	11	²⁶ Department of Employment and Workplace Relations (Cth), <i>Secretary's Statement – 21 March 2025</i> (Web Page, 21 March 2025) https://www.dewr.gov.au/assuring-integrity-targeted-compliance-framework/announcements/secretarys-statement-21-march-2025 .
27-28	12	²⁷ Department of Employment and Workplace Relations (Cth), <i>Assuring the Integrity of the Targeted Compliance Framework</i> (Web Page, 16 May 2025) https://www.dewr.gov.au/assuring-integrity-targeted-compliance-framework .
29	12	²⁹ Department of Employment and Workplace Relations, <i>Workforce Australia Caseload Time Series - October 2022 to March 2025</i> (Report, 17 April 2025) https://www.dewr.gov.au/employment-services-data/resources/workforce-australia-caseload-time-series-october-2022-march-2025 .
30	13	³⁰ Review documentation supplied, ED75, ED76 (held on file).
31	14	³¹ Joint Committee of Public Accounts and Audit, <i>Report 505: Inquiry into Policy and Program Design and Implementation</i> (Parliamentary Paper No 505, 2023) 54–56.
32	14	³² Department of Finance (Cth), <i>Commonwealth Risk Management Policy</i> (Policy Document, July 2014) https://www.finance.gov.au/government/comcover/commonwealth-risk-management-framework .
33	14	³³ <i>Ombudsman Act 1976</i> (Cth) s 5(1)(b).
34	14	³⁴ <i>Administrative Review Tribunal Act 2024</i> (Cth) s 9; <i>Administrative Review Tribunal (Consequential and Transitional Provisions No. 1) Act 2024</i> (Cth) sch 1.
35	14	³⁵ Review interview record, MR05, MR09, MR18 (held on file).
36	14	³⁶ Department of Finance (Cth), <i>Commonwealth Risk Management Policy</i> (Policy Document, July 2014) https://www.finance.gov.au/government/comcover/commonwealth-risk-management-framework .
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38	15	³⁸ Review interview records, MR18, MR22 (held on file).
39	15	³⁹ Christopher Hodges, 'An Introduction to Outcome Based Cooperative Regulation (OBCR)' (SSRN Scholarly Paper ID 4031491, 1 February 2022) https://ssrn.com/abstract=4031491 ; NSW Productivity Commission, 'Guidance for Regulators to Implement Outcomes and Risk-Based Regulation' (Report, October 2016) https://www.productivity.nsw.gov.au/sites/default/files/2018-05/Guidance_for_regulators_to_implement_outcomes_and_risk-based_regulation-October_2016.pdf ; Generis, 'The Role of Stakeholder Engagement in Enhancing Compliance Strategies' (Web Page, 2024) https://generisonline.com/the-role-of-stakeholder-engagement-in-enhancing-compliance-strategies/ .
40	15	⁴⁰ 'Digital First Doesn't Equal Digital Only', <i>Forbes</i> (online, 8 June 2021) https://www.forbes.com/councils/forbesfinancecouncil/2021/06/08/digital-first-doesnt-equal-digital-only/ ; 'Digital-first, but not digital-only, approach adopted', <i>The Straits Times</i> (online, 6 November 2024) https://www.straitstimes.com/opinion/forum/forum-digital-first-but-not-digital-only-approach-adopted ; 'Why 'digital-first' should not mean 'digital-only'', <i>The Business Times</i> (online, 3 November 2023) https://www.businesstimes.com.sg/companies-markets/banking-finance/future-finance-2023/why-digital-first-should-not-mean-digital .

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41	15	⁴¹ Department of Finance (Cth), Commonwealth Risk Management Policy (Policy Document, July 2014) https://www.finance.gov.au/government/comcover/commonwealth-risk-management-framework .
42	18	⁴² Department of Employment and Workplace Relations, Workforce Australia Caseload Time Series - October 2022 to March 2025 (Report, 17 April 2025) https://www.dewr.gov.au/employment-services-data/resources/workforce-australia-caseload-time-series-october-2022-march-2025 .
43	18	⁴³ Department of Employment and Workplace Relations (Cth), Secretary's Opening Statement – Assuring the Integrity of the Targeted Compliance Framework (Web Page, 26 February 2025) https://www.dewr.gov.au/assuring-integrity-targeted-compliance-framework/announcements/secretarys-opening-statement .
44	18	⁴⁴ Michael A Vasarhelyi and Miklos A Alles, 'The "Now" Economy and the Need for Continuous Assurance and Reporting' (2008) 22(2) <u>International Journal of Accounting Information Systems</u> 1, 3–4.



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