##### An Australian Government Initiative - SBR

Standard Business Reporting

Australian Taxation Office –

Client Communication (CLNTCOMM.0001 2020)
Business Implementation Guide

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This document and its attachments are **Official**

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Version control

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Endorsement

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# 1. Introduction

## 1.1 Purpose and document context

The purpose of this document is to provide information to assist Digital Service Providers (DSPs) in understanding the business context surrounding the client communication service. These interactions are performed with the Australian Taxation Office (ATO) through the Standard Business Reporting (SBRebMS3) platform with a message format of XML

The ATO CLNTCOMM.0001 2020 Business Implementation Guide (BIG) forms part of the broader suite of documents used by the ATO to describe or interpret how the technical implementation relates back to the business context and process. This document is designed to be read in conjunction with the ATO SBR documentation suite including the:

[ATO Common Business Implementation and Taxpayer declaration Guide](https://www.sbr.gov.au/digital-service-providers/developer-tools/australian-taxation-office-ato/ato-common-artefacts-and-reference-documents#CBG)

web service/platform information

test information, for example conformance suites

Message Structure Tables

validation rules.

## 1.2 Glossary

For a glossary of terminology, see:

[SBR glossary](https://www.sbr.gov.au/digital-service-providers/developer-tools/glossary)

[ATO definitions](https://www.ato.gov.au/Definitions/?anchor=top).

# 2. What is the client communication service?

The Client Communication List (CCL) was introduced in March 2015 to allow tax practitioners to view correspondence issued to their clients in the tax agent portal. The CCL in recent times has changed in name and is currently referred to as Communication History (CH) within Online Services for Agents (OSFA).

The Communication history function in OSFA allows tax practitioners to view and retrieve ATO communications issued to their respective clients via myGov, paper, SMS, email, ATO app, ATO Online and agent digital channels.

The current OSFA Communication History function is limited to listing a maximum of 1,000 client communication items and offers only single document retrieval (there is no bulk communication retrieval via OSFA). The client communication service allows for larger communication item lists and allows communications retrieval in bulk.

The Client Communication List interaction (CLNTCOMM.0001. 2020.LIST) allows a tax practitioner to request and list a client communication record for either single, multiple or all clients.

The Client Communication Get interaction (CLNTCOMM.0001.2020.GET) allows a tax practitioner to request and retrieve client communications for either single, multiple or all clients.

## 2.1 Communication preferences

The client communication service supports the communication preferences service. The extension of communication preferences to a wholesale offering is dependent on the delivery channel of the particular client communication, as communications preferenced to a tax practitioner can be retrieved in software.

**Communication preferences and the agent digital channel**

The agent digital channel is the outbound delivery channel used to issue correspondence to a tax practitioner where they have preferenced communications to their practice. Agent digital communication is delivered in OSFA to a dedicated list (digital inbox) named client mail.

For more information, see[Client communication](https://www.ato.gov.au/Tax-professionals/Digital-services/Online-services-for-agents/Client-communication/) and the [Communication Preferences (COMMPREF) Business Implementation Guide](https://www.sbr.gov.au/digital-service-providers/developer-tools/australian-taxation-office-ato/obligation-management-oblmgt/client-management-clntmgt#CommsChannel).

## 2.2 Availability of client communications

What a tax practitioner can view is determined by the client agent relationship level.. When a tax agent is linked at the client level, they have full visibility of all communication issued for the client (including those sent to other tax practitioners, for example, a BAS agent).

A tax practitioner linked to a client at account level will only have visibility of communications issued to the accounts they are authorised to access. If linked to an activity statement account, they will also have access to a small selection of communications that relate to their responsibilities. These communications include:

PAYG Instalment - entitlement advice

new PAYG Instalment - individual / consolidated group member

new PAYG Instalment - introduction

new PAYG Instalment - payment options

registration update - PAYG Instalments disallowed

registration confirmation/update - PAYG Instalments consolidated group allowed.

Communications that are included in the communication history cover the following 6 channels:

paper

myGov

SMS

email

ATO online

agent digital

ATO app.

**Note:** The ATO app is a new communication channel being introduced in 2025 that enables individual clients to receive security alerts when high risk transactions occur on their account.

## 2.3 Interactions

Table 1: Client communications SBR service interactions

| **Interaction** | **Description** | **Single** | **Batch** | **Bulk** |
| --- | --- | --- | --- | --- |
| Client Communication 2020 – List | This service allows a registered tax practitioner to request a list of client communications for single, multiple or all clients.The single service will return up to a maximum of 100 records per request.The bulk service will return more than 100 records per request. | Y\* | N | Y |
| Client Communication 2020 – Get | This service allows a registered agent to retrieve client communication items.Get requires a list interaction to have occurred first in order to obtain document IDs.The single service will only retrieve a single item per request.The bulk service will retrieve multiple items for multiple clients across multiple channels overnight. | Y\* | N | Y |

\* Single is only available if Bulk services have been implemented.

**Single vs bulk – Recommended usage**

Single list must only be used where the number of items being listed is 100 or less. Where more than 100 items are to be listed, bulk list need to be used. Single retrieval is only to be used where an tax practitioner needs immediate access to a specific communication that hasn’t been retrieved by a scheduled bulk request.

Bulk retrieval must be used where more than one communication is to be retrieved.

## 2.4 Service orchestration

Table 2: SBR interactions for client communication services.

| **Action** | **Tax practitioner** | **SBR service interaction** |
| --- | --- | --- |
| Request list of communications | Tax practitioner requests a list of communication issued for a client(s) | CLTCOMM.0001.2020.LIST(SINGLE)CLTCOMM.0001.2020.LIST(BATCH) overnight |
| Request to get communications  | Tax practitioner chooses the communication/s to retrieve and when Retrieve one document for immediate review Download multiple documents overnight | CLTCOMM.0001.2020.GET (SINGLE)CLTCOMM.0001.2020.GET (BULK) |

Table 3: Service orchestration for client communication service

|  |  |
| --- | --- |
| **Interaction** | **Inputs required** |
| CLNTCOMM.0001.2020.LIST | tax or BAS agent ABN, RAN and credentialclient identifier or typesearch start date and end datedelivery channelssort criteria: Sent date, ascending. |
| CLNTCOMM.0001.2020.GET | tax or BAS agent ABN, RAN and credentialclient identifierdocument identifier.  |

## 2.4.1 Retrieving client communications for a new client

Table 4: SBR interactions for retrieving client communications for a new client.

| **Action** | **Tax practitioner** | **SBR service interaction** |
| --- | --- | --- |
| **Step 1**: Search for a client | Search for a new client or review existing client’s relationships to other tax practitioner  | Client search (curel.0004.2018.search) |
| **Step 2:** Add client relation | Add a new relationship to the client  | Add client relationship (curel.0004.2018.submit) |
| **Step 3:** Review Client demographic information | Review and update client demographics*If only reviewing and updating client demographics, the process ends here.* | See *Client Demographics Business Implementation Guide* |
| **Step 4:** Retrieve client communication history | **Scenario 1**:If Tax practitioner retrieves list of available communication for client**Scenario 2:** Tax practitioner reviews a specific communication item **Scenario 3:**Tax practitioner retrieves client communication history overnight | **Scenario 1:**CLTCOMM.0001.2020.LIST (SINGLE) **Or**CLTCOMM.0001.2020.LIST (BULK)**Scenario 2:**CLTCOMM.0001.2020.GET (SINGLE) **Scenario 3:**CLTCOMM.0001.2020.GET (BULK)  |

# 3. Authorisation

## 3.1 Intermediary relationship

The type of SBR service an intermediary can use on behalf of their clients depends on the activity being undertaken and whether the intermediary has a recognised relationship with the client. That is, an intermediary has the appropriate authorisation for the interaction being performed on behalf of the taxpayer recorded in ATO systems. The intermediary relationship is a fundamental precondition for a tax practitioner to interact with SBR for the Communication Preferences services.

**Note:** If the relationship does not exist, the SBR Add Client Relationship interaction of the Client Update services can be used to establish a relationship between the intermediary and the taxpayer. Refer to the [SBR website](https://www.sbr.gov.au/digital-service-providers/developer-tools/australian-taxation-office-ato/obligation-management-oblmgt/client-management-clntmgt) and ATO CRUEL 2018 Business Implementation Guide for more information on client management.

## 3.2 Access manager

Access Manager is used to manage access and permissions for SBR online services. ATO systems will check that the initiating party is allowed to use the interaction that is received through the SBR channel. The initiating party is subject to restrictions on the clients account based on their Access Manager permissions.

For more information on Access Manager, see the [ATO website](https://www.ato.gov.au/General/online-services/access-manager/). The table below displays the interactions available to each initiating party via SBR for the client communication service.

**Table 5: Initiating party permissions**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Interaction** | **Activity** | **Tax agent** | **BAS agent** | **Business** | **Business Intermediary** |
| List (CLNTCOMM.0001.2020.LIST) | To view a list of client communications for a client or multiple clients. | Y | Y | N | N |
| Get (CLNTCOMM.0001.2020.GET) | To retrieve a specific client communication item. | Y | Y | N | N |

A user must be assigned the appropriate authorisation permissions to use the lodgment service. The table below references the SBR service to the relevant permission in Access Manager:

Table 6: Access Manager permissions

|  |  |  |
| --- | --- | --- |
| **Interaction** | **Initiating party** | **Access Manager Permission** |
| CLNTCOMM.0001.2020.LIST | Tax/BAS agent | Client.Corro.View |
| CLNTCOMM.0001.2020.GET | Tax/BAS agent | Client.Corro.View |

# 4. Constraints and known issues

## 4.1 Usage restrictions

Digital Service Providers (DSPs) must be aware of the usage restrictions, which are described within the [Reasonable use of ATO digital wholesale services](https://softwaredevelopers.ato.gov.au/sites/default/files/2020-06/Reasonable_use_of_ATO_digital_wholesale_services.pdf) and [DSP conditions of use](https://softwaredevelopers.ato.gov.au/usingourservices/dsp-conditions-use). The ATO actively monitors the use of services and will notify DSPs that contravene the reasonable use policy.

Continued breaches or failing to adhere to the conditions of use may result in de-whitelisting.

## 4.2 Contraints

This interaction has the following unique constraints:

* Bulk and Batch Request Processor (BBRP) services must be implemented prior to whitelisting of Single Request Processor (SRP)
* Only one logical record is allowed for each client communication batch transmission.
* Client communications (documents) are only intended to be retrieved once.

## 4.3 Client Communications service guidance

The ATO processes client communications (outbound correspondence) in batches, outside of business hours on weekdays. We recommend the SBR BBRP to be used between 8:00pm AEST/AEDT and 6:00am AEST/AEDT, as most batches will have finished by 8:00pm AEST/AEDT.

During peak processing periods (for instance, the beginning of tax time) it may take longer for processing to be finailsed and client communications may not be available until later in the evening.

SMS messages and emails are processed during business hours. BBRP is recommended for these channels during business hours. The SMS window is between 10am AEST/AEDT and 6:00pm AEST/AEDT.

ATO app messages are sent in real time 24/7 which are security alerts sent directly to client and practitioner action is generally not required.

The SBR SRP can be used in business hours where immediate responses are required.

### 4.3.1 Listing client communications

The SBR SRP needs to be utilised in the situation where you want to use the single (quick) list function and an immediate response is required to support human interaction. For example, you may want to use the single (quick) list function where you want to retrieve a list of client communications for a single client. The single (quick) list function is limited to 100 records.

The SBR BBRP must be used where you want to use the bulk list function. The bulk list function needs to be used when:

* + onboarding new clients and need to list their communication history
	+ required to list all new communications available for the last 24 hours (daily view)
	+ an immediate response isn’t required, which may include retrieving client communications for a later consultation with a client.

### 4.3.2 Retrieving client communications (documents)

The SBR SRP needs to be utilised in the situation where you want to use the Get Single function and an immediate response is required to support human interaction. For example, when you have a face-to-face consultation with a client and haven’t been able to retrieve communications prior to the consultation.

The SBR BBRP must be used where you want to use the get bulk function. The get bulk function needs to be used where:

* + onboarding new clients and want to retrieve their historical communications (documents)
	+ retrieving all new communications (documents) available for the last 24 hours (daily retrieval)
	+ an immediate response isn’t required, which may include retrieving historical client communications (documents) for a later consultation with a client.

### 4.3.3 Other scenarios

The SBR BBRP must be used where you want to use the Get bulk function to onboard a new practice. The ATO [Digital Partnership Office (DPO)](https://softwaredevelopers.ato.gov.au/DPO) **must** be engaged to schedule a mutually agreeable time to list and retrieve client communications.

### 4.3.4 Polling

Polling of our services to identify new communications issued during business hours, SMS messages and emails, need to be restricted to a frequency of no more than once per 60 minutes and must be restricted to listing client communications issued within this period.

## 4.3 Known issues

There are no known issues at the time of publication.

Appendix A - Limits, restrictions and validation rules for the quick list service (SRP)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Request Type** | **No. of** **Clients** | **Date Range** | **Mandatory** **Criteria** | **Optional****Criteria** | **Notes** |
| **Whole of practice** | Single RAN | Maximum of 7 days in a date range 1/07/2008 to current | Must specify the Channel(s) * paper
* myGov
* SMS
* email
* agent digital
* ATO Online
* ATO app.

All Channel options can be specified.Sort order - Date or client name.Sort type - Ascending or descending. | Default = ‘all’ document categoriesRequest a single document category from the following:* advise
* confirm
* checklist
* finalise
* inform
* invite
* legal
* notify
* request
* review
* attachments
* reminder
* demand.

Tax record statement | * A maximum of 100 items will be returned.
* If the criteria specified will result in more than 100 items, the first 100 will be returned.
* An indicator will also be returned where there are more results.
* This will indicate to the agent/DSP they will need to refine the query criteria or use the bulk list service.
 |
| **Specified clients**Client identifiers can be:* + TFN
	+ ABN
	+ WPN
	+ ARN

A mix of identifiers are allowed in a request | 1 - 20 | Maximum of 10 years in a date range from1/07/2008 to current date | As above | As above | As above |

Appendix B - Limits, restrictions and validation rules for the bulk list service (BBRP)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Request Type** | **No. of** **Clients** | **Date Range** | **Mandatory** **Criteria** | **Optional****Criteria** |
| **Whole of practice** | Single RAN | Maximum of 7 days in a date range from 1/07/2008 to current | Must specify the Channel: * + paper
	+ myGov
	+ SMS
	+ email
	+ agent digital
	+ ATO Online
	+ ATO app

All Channel options can be specified.Sort order - Date or client name.Sort type - Ascending or descending. | * Default = ‘all’ document categories
* Can request a single document category from the following:
	+ advise
	+ confirm
	+ checklist
	+ finalise
	+ inform
	+ invite
	+ legal
	+ notify
	+ request
	+ review
	+ attachments
	+ reminder
	+ demand.

Tax record statement |
| **Specified clients**Client identifiers can be:* + TFN
	+ ABN
	+ WPN
	+ ARN

A mix of identifiers are allowed in a request. | 1 - 20 | Maximum of 10 years in a date range from 1/07/2008 to current date | As above | As above |