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| Standard Business ReportingAustralian Taxation Office – Client Communication (CLNTCOMM.0001 2020)Business Implementation Guide Date: 20 May 2021Draft |
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1. Introduction
	1. Purpose

The purpose of this document is to provide information to assist digital service providers to understand 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.

* 1. Document Context

The ATO CLNTCOMM.0001 2020 Business Implementation Guide 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:

* web service/platform information
* ATO Common Business Implementation and Taxpayer Declaration Guide
* ATO SBR Service Registry
* test information, for example conformance suites
* message structure tables
* validation rules.
1. What is the Client communication service?

The Client Communication List service (CLNTCOMM.0001.2020.LIST) allows a tax practitioner to request and list a client communication record for a single client, multiple clients or all clients.

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

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 the myGov, Paper, SMS, Email, ATO Online or Agent Digital channels. Additionally, individuals have access to view their own ATO issued correspondence through Online services for Individuals and businesses will progressively have access via Online services for Business (OSB) during 2020-21.

The current OSFA Communication history function is limited to listing a maximum of 1,000 client communication items and offers only single document retrieval. The service does not currently allow for bulk communication retrieval. The Client Communication service will allow for larger communication item lists and will also allow communications to be retrieved in bulk.

## Communication preferences

The Client Communication service will also support the Communication preferences service. The extension of Communication preferences to a wholesale offering is dependent on the delivery of the Client Communication service as it will enable communications preferenced to a tax practitioner to 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.

More information about Client communications can be found on ato.gov.au.

## Availability of client communications

While the majority of ATO issued client communications are available in the CCL, there are still some communications that are not available in the CCL.

What a tax practitioner can view is determined by how they are linked to the client. If an agent is linked at the client level then they will have visibility of all communication issued for the client, including those sent to other agents for example a BAS agent).

A tax practitioner linked to a client at the account level will only have visibility of communications issued to this account. 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 CCL cover the following 6 channels:

* paper
* myGov
* SMS
* email
* ATO online
* agent digital.
	1. Interactions

The Client Communication service consist of the following interactions:

| **Interaction** | **Description** | **Single** | **Batch** | **Bulk** |
| --- | --- | --- | --- | --- |
| Client Communication 2020 - List | This service allows a registered agent to request a list of client communications for a single client, multiple clients or all clients.The single service will only 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 ID/sThe 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 |

Table 1: Interactions available for Client Communication service.

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

**Single vs bulk – recommended usage**

Single list should only be used where the number of items being listed is 100 or less. Where potentially more than 100 items are to be listed, bulk list should be used.

Single retrieval should only be used where an agent needs immediate access to a specific communication that has not been retrieved by a scheduled bulk request.

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

* 1. Service orchestration

|  |  |  |
| --- | --- | --- |
|  | Tax practitioner | SBR service interaction |
| * + Request list of comms
 |  | CLTCOMM.0001.2020.LIST(SINGLE)CLTCOMM.0001.2020.LIST(BULK)Agent requests a list of communication issued for a client(s)CLTCOMM.0001.2020.GET (SINGLE)Agent chooses which communication/s to retrieveCLTCOMM.0001.2020.GET (BULK)Retrieve one document for immediate review Download multiple documents |
| Request to get communication |  |  |
|  |  |
|  |  |

Figure 1: SBR interactions for Client communication services.

| **Interaction** | **Inputs required** |
| --- | --- |
| CLNTCOMM.0001.2020.LIST | * Tax/BAS agent ABN, RAN and credential
* Client identifier or type
* Search start date and end date
* Delivery channels
* Sort criteria: Sent date, Ascending
 |
| CLNTCOMM.0001.2020.GET | * Tax/BAS agent ABN, RAN and credential
* Client identifier
* Document identifier
 |

Table 2: Service Orchestration for Client communication service.

### Retrieving client communications for a new client a new client

|  |  |  |
| --- | --- | --- |
|  | Tax practitioner | SBR service interaction |
| Search for a client |  | Client Search (curel.0004.2018.search)Search for a new client or review existing client’s relationships to other agentsAdd Client Relationship (curel.0004.2018.submit)Add a new relationship to the client See *Client Demographics Business Implementation Guide*Review and update client demographicsAgent retrieves list of available communication for clientCLTCOMM.0001.2020.LIST(SINGLE)CLTCOMM.0001.2020.LIST(BULK) Agent reviews a specific communication itemAgent retrieves client communication history overnightCLTCOMM.0001.2020.GET (SINGLE) CLTCOMM.0001.2020.GET (BULK)  |
| Add client relationship |  |  |
| Review Client demographic information |  |  |
| Retrieve client communication history |  |  |
|  |  |
|  |  |

Figure 2: SBR interactions for retrieving client communications for a new client.

1. Authorisation
	1. Intermediary Relationship

The SBR services an intermediary, such as a tax or BAS agent, can use on behalf of their clients is dependent on the activity being undertaken and whether the tax practitioner has a relationship with the client. That is, a tax practitioner must have the appropriate authorisation for the interaction being performed on behalf of the taxpayer, as recorded in ATO systems.

|  |  |
| --- | --- |
| attention_pms | The tax\BAS agent to taxpayer relationship is a fundamental precondition to interacting with SBR for ATO lodgment service interactions. |

**Note**: If the relationship does not exist, the Client Update Relationship service can be used to establish the relationship between the tax\BAS agent and the taxpayer. See the Client Update Relationship Business Implementation Guide and the ATO SBR Service Registry for further information.

## Access

Refer to Section 3, Access in the Common Business Implementation and Taxpayer Declaration Guide.

* 1. Initiating parties

ATO systems will check that the initiating party is authorised 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 permissions. The table below displays the interactions available to each initiating party via SBR for the Lodgment service.

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

Table 3: Parties able to use Client communication service.

* 1. Permissions

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:

| **Service** | **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 |

Table 4: Access Manager Permissions.

1. Constraints and Known Issues

## Constraints When Using This Service

This interaction has the following unique constraints:

* the Bulk and Batch Request Processor (BBRP) services must be implemented prior to whitelisting of Single Request Processor (SRP)
* client communications (documents) are intended to be retrieved once.
	1. Reasonable use

Digital service providers (DSPs) should be aware of the usage restrictions, which are described within the Reasonable Use guidelines. The ATO actively monitors the use of services and will notify DSPs that contravene this policy. Continued breaches may result in de-whitelisting. The [Reasonable use of ATO digital wholesale services guidelines](https://softwaredevelopers.ato.gov.au/Usingourservices#Reasonableuse) outlines the ATO’s expectations on reasonable use of ATO Standard Business Reporting services.

Below are the specific guidelines for the Client Communications (CLNTCOMM.0001 2020) service.

The ATO generally processes client communications (outbound correspondence) in batches outside of business hours on weekdays. We recommend that the SBR BBRP be used between the hours of 8:00pm AEST/AEDT and 6:00am AEST/AEDT as most batches will have finished by 8:00pm AEST/AEDT. During peak processing periods (such as the beginning of tax time) it may take longer for us to finalise our processing and client communications may not be available until later in the evening.

We do process SMS messages (and some emails) during business hours and you may want to use the BBRP during business hours for these channels. Our SMS window is between 10am AEST/AEDT and 6:00pm AEST/AEDT.

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

1. **Listing client communications**
	1. The SBR SRP should be utilised in 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.
	2. The SBR BBRP must be used where you want to use the Bulk List function. The Bulk List function should be used where:
		* you are onboarding new clients and want to list their communication history
		* you want to list all new communications available for the last 24 hours (daily view)
		* an immediate response is not required, which may include retrieving client communications for a later consultation with a client.
2. **Retrieving client communications (documents)**
	1. The SBR SRP should be utilised in where you want to use the Get Single function and an immediate response is required to support human interaction. For example, you may want to use this when you have a face-to-face consultation with a client and haven’t been able to retrieve communications prior to the consultation
	2. The SBR BBRP must be used where you want to use the Get Bulk function. The Get Bulk function should be used where:
		* you are onboarding new clients and want to retrieve their historical communications (documents)
		* you want to retrieve all new communications (documents) available for the last 24 hours (daily retrieval)
		* an immediate response is not required, which may include retrieving historical client communications (documents) for a later consultation with a client.
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 DPO should be engaged to schedule a mutually agreeable time to list and retrieve client communications.

1. **Polling**

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

* 1. Known issues

Not applicable.

# 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 range1/07/2008 to current | Must specify the Channel(s) * Paper
* myGov
* SMS
* Email
* Agent Digital
* ATO Online

All Channel options can be specified.* Sort order - Date or Client name.
* Sort type - Ascending or Descending.
 | Default = ‘all’ document categoriesCan request a single document category from the following:* Advise
* Confirm
* Checklist
* Finalise
* Inform
* Invite
* Legal
* Notify
* Request
* 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 any of the following:
	+ TFN
	+ ABN
	+ WPN
	+ ARN
* A mix of identifiers allowed in a request
 | 1 - 20 | Maximum of 10 yearsin 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
* 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
	+ Attachments
	+ Reminder
	+ Demand
	+ Tax Record Statement
 |
| **Specified clients*** Client identifiers can be any of the following:
	+ TFN
	+ ABN
	+ WPN
	+ ARN
* A mix of identifiers 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
 |