Australian Government
Department of Finance

# Gateway Review Report (First Stage) Review

For: National Firearms Register Program

To: Jeremy Johnson

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| **Entity name:** | Australian Criminal Intelligence Commission | |
| **Program/Project name:** | National Firearms Register Program | |
| **Review type:** | First-Stage Review | |
| **Senior Responsible Official (SRO):** | Jeremy Johnson | |
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| **Date report provided to Assurance Reviews Unit:** | | |
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| **Review Team Member:** | s 22(1)(a)(ii) | |
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This report has been prepared in accordance with the Australian Government's Gateway Review Process (Gateway) methodology as set out in *Resource Management Guide 106: Australian Government Assurance Reviews.*

The report summarises the findings and recommendations of the review team, which are based on information provided to the review team during the review process.

A copy of the report is provided to the Assurance Reviews Unit (ARU), Department of Finance at the conclusion of the review to identify lessons learned and evidence of best practice. Where a project or program includes an ICT component the report is shared with the Digital Transformation Agency (DTA). The report is not shared more broadly without agreement from the SRO. A copy may be provided to subsequent review teams as pre-reading material for future reviews.

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# Gateway Assurance Dashboard

## Delivery Confidence Assessment

### *Rating*

The review team finds that the overall delivery confidence assessment for the program at this point in time is

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|---|---|
| Amber | **Successful delivery of the program to time, cost, quality standards and benefits realisation appears feasible but significant issues already exist requiring management attention. These need to be addressed promptly.** |

### *Factors Affecting Rating*

**Overall Program Rating: Amber**

The Program has obtained financial commitments from the Commonwealth, with states expected to further supplement this funding to stand up and operate the NFR and is at the end of the first quarter year of a four-year program.

Progress has been made in critical areas such as stakeholder engagement, and the development of data standards.

The program is yet to establish status reporting or an integrated schedule. Many review participants reported that their activities were running late compared to the high-level roadmap.

Program management capacity, resourcing shortfalls and delays in recruitment for critical technical roles are impacting key milestones. Legislative complexities across jurisdictions remain unresolved, posing risks to the program's scope and timeline, particularly as key states are still negotiating Federation Funding Agreements.

Commonwealth agency engagement, particularly from ABF and Defence, is insufficient, raising concerns about coordination and national integration as the program moves forward.
End user engagement including in design, especially with firearm dealers, remains limited thereby increasing the risk of misalignment between system design and operational needs.

## Summary of Key Focus Area Ratings

| Key Focus Area | Rating | |
|---|---|---|
| Policy Context and Strategic Fit | Amber | There are issues in this Key Focus Area that require timely management attention. |
| Business Case and Benefits | Green | There are no major outstanding issues in this Key Focus Area that at this stage appear to threaten delivery significantly. |
| Stakeholders and End Users | Amber | There are issues in this Key Focus Area that require timely management attention. |
| Governance and Planning | Amber | There are issues in this Key Focus Area that require timely management attention. |
| Risk Management | Amber | There are issues in this Key Focus Area that require timely management attention. |

| Key Focus Area | Rating | |
|---|---|---|
| Review of Current Phase | Amber | There are issues in this Key Focus Area that require timely management attention. |
| Readiness for Next Stage | Amber | There are issues in this Key Focus Area that require timely management attention. |

## Summary of Findings

The National Firearms Register (NFR) program has made strong progress in critical areas, including early consultations, development of a governance framework, choosing a low-risk technical solution, advancing work on data standards, program investment logic, change management and stakeholder engagement.

Jurisdictions are aligning with national objectives, and financial commitments from the Commonwealth, totalling $161.3 million, have provided much-needed support. Several Federation Funding Agreements (FFAs) have been successfully signed between the Commonwealth and key states, providing a strong foundation for the program's national implementation. The ongoing negotiations with Western Australia, Victoria, and the ACT however, present a risk to achieving full national coverage, potentially delaying the alignment of those jurisdictions with the program's objectives.

While the value-proposition is well-supported, a more robust approach to benefits realisation and stakeholder engagement is required. Commonwealth partners such as ABF and Defence have not been fully integrated into the program's structure, raising concerns about national coordination. Furthermore, engagement with key operational end users, such as firearm dealers, has been limited, posing potential risks for system usability and alignment with practical needs.

Governance arrangements, though partially established, are not yet fully operational. Delays in setting up governance bodies and formal reporting mechanisms have impacted program oversight and transparency. Additionally, the absence of a fully developed Program Management Plan (PMP) and status reporting have limited visibility into the true status of the project.

Risk management processes are in place but not fully operational, with many risks, particularly around resourcing and legislative changes, yet to be escalated or mitigated.

As the program prepares for the next phase, significant gaps remain in resourcing, particularly for critical technical roles, which could impact the program's timeline. Furthermore, legislative complexities across jurisdictions pose risks that could further delay the program's progress.

To meet future milestones, the program will need to address these resource shortfalls, finalise legislative dependencies, and ensure stronger collaboration across stakeholders.

## Summary of Recommendations

The review team makes the following recommendations which are provided with an urgency category.

| Rec No | Key Focus Area | Recommendation | Urgency Category |
|---|---|---|---|
| R1 | Stakeholders and End Users | ACIC to engage the ABF and Defence to ensure that their roles and responsibilities are clearly defined and integrated into the program structure and Governance. | Essential - do by Feb 2025 |
| R2 | Stakeholders and End Users | Adopt a user-centred design approach to ensure operational requirements are fully integrated into the NFR<br>Guidance: Map user pathways for dealers, register staff. Frontline staff. Conduct User Experience (UX) design on system interfaces. | Essential - do by May 2025 |
| R3 | Stakeholders and End Users | Develop a compliance framework that ensures end-user adherence to NFR data entry and usage standards.<br>Guidance: This framework could include a mix of user training, incentive mechanisms, and auditing, alongside penalties for non-compliance. This will drive greater user engagement, system accuracy, and ultimately the successful adoption of the NFR. | Essential – do by May 2025 |
| R4 | Governance and Planning | Review, streamline and fully implement Program governance arrangements.<br>Guidance: Distinguish between governance forums and working arrangements | Essential – do by March 2025 |
| R5 | Governance and Planning | Implement formal Program reporting arrangements.<br>Guidance: Program updates could be done now while formal reporting is appropriately designed. | Critical – do now |
| R6 | Governance and Planning | Develop an integrated master schedule including jurisdiction and agency milestones and key dependencies.<br>Guidance: Consider resourcing while developing a realistic schedule | Critical – do now |
| R7 | Risk Management | Create a single, program-wide risk register that pragmatically consolidates risks across all levels (strategic, program, and project) and partners with the capability to filter risks by their level of severity and source. | Critical - do now |
| R8 | Risk Management | Establish clear and standardised triggers and process for escalating risks from the project or partner level to the program level allowing for timely interventions by governance bodies such as the ISC. | Critical - do now |
| R9 | Readiness for Next Stage | Develop a comprehensive Resource Management Plan to mitigate critical resourcing risks.<br>Guidance: Consider delivery partners in this plan | Essential – do by March |
| R10 | Readiness for Next Stage | Appoint a dedicated Program resource with the right capability to expedite the development of key project management documents and streamline governance processes, ensuring they are operationalised and effectively driving the program forward | Critical – do now |

| Rec No | Key Focus Area | Recommendation | Urgency Category |
|---|---|---|---|
| R11 | Readiness for Next Stage | Appoint a full-time Legislative Stream lead supported with appropriate resources to ensure the timely settlement of legislative features required for the NFR's implementation across all jurisdictions and aligning legal frameworks with the program's objectives. | Critical - do now |
| R12 | Readiness for Next Stage | Develop a clear set of design principles that fully encapsulate the national firearms ecosystem, ensuring that all future systems and enhancements align with the broader objectives of the NFR and adhere to National Data Standards. | Essential - do by Feb 2025 |
| R13 | | Conduct a mid-stage review | Recommended May 2025 |

Definitions for the ratings provided for the Delivery Confidence Assessment, Key Focus Areas and Urgency Category are provided at Appendix F.

## Appendices:

Appendix A. Gateway Assurance Plan.

Appendix B. Previous Recommendations and Actions Taken.

Appendix C. Review Checklist.

Appendix D. List of Interviewees.

Appendix E. List of Documents Reviewed.

Appendix F. Assessment Rating Definitions.

# Introduction

## Program Description and Background

**The outcomes and benefits of the program:**

The National Firearms Register (NFR) will be an end-to-end information sharing and management ecosystem for firearms (including frames, receivers and suppressors) and firearm licence/permit holders. The NFR will be a federated model, drawing information from existing state and territory registries and Commonwealth firearms management systems, and connect with the National Criminal Intelligence System to deliver firearm related risk information for frontline police officers and other users.

The NFR will provide a lifecycle view of registered firearms in Australia, delivering timely and accurate information on firearms and licence/permit holders across all jurisdictions. Once established, police will know where registered firearms are, who owns them and what other risks to the community and police may exist. Ultimately, this will enhance police and community safety and improve law enforcement capability.

Specific benefits to be realised by the NFR include:

- Improved quality and sharing of national firearms data,
- Improved analytics and investigative capability,
- Improved consistency of national firearms management,
- Improved police safety, and
- Improved community safety.

**The policy context or need for the program:**

On 6 December 2023, National Cabinet agreed to implement a national register for firearms, delivering on an outstanding reform from the Port Arthur response in 1996. The Commonwealth committed $161.3 million from 1 July 2024 - 30 June 2028 to implement the NFR, bringing together firearms information from state, territory and Commonwealth firearm management systems under a national system. The NFR will be implemented under a cost-sharing arrangement with each state and territory receiving Commonwealth and non-Commonwealth contributions to fund the NFR.

The NFR Implementation Program (the NFR Program) is a collaborative effort between state and territory police agencies and Commonwealth agencies (Attorney General's Department, the Australian Criminal Intelligence Commission, Australian Border Force, the Department of Defence and the Australian Federal Police) – collectively known as partner agencies.

**Significant sub-programs and projects:**

The NFR Program is comprised of the 13 partner agency projects/programs, each with their own scope of responsibilities to deliver improved firearm information management capabilities within their legislated mandates. Through partner agency projects/programs, the NFR Program will deliver legislative, policy, business, technical and data improvements across all partner firearms, firearms licences and permits management functions. Coordinated change management and stakeholder engagement will ensure partners and industry can implement the NFR Program successfully to deliver the expected police and community safety benefits.

As part of ACIC's project responsibilities, the National Criminal Intelligence System (NCIS) will have capability improvements to deliver NFR-related functionality. The NCIS Program is

subject to Assurance Reviews such as the Department of Finance's Gateway Review and the Digital Transformation Agency's Tier 1 Assurance program.

## Scope of the Review

This is a First Stage Review covering the Key Focus Areas of:

- Policy Context
- Business Case and Benefits
- Stakeholders and End Users
- Governance and Planning
- Risk Management
- Review of Current Phase (Program Activities up until this review)
- Readiness for Next Stage (Until the next Review)

The scope of this program includes delivery by multiple commonwealth agencies and state and territory governments.

## Acknowledgements

The review team would like to thank Jeremy Johnson as the Senior Responsible Officer and all those interviewed for their participation in the review. The support and openness from all parties contributed to the broader understanding of the program and the successful completion of the review. Additionally, the review team would like to thank s 22(1)(a)(ii) and s 22(1)(a)(ii) for their excellent administrative support.

# Detailed Findings and Recommendations

## Policy Context and Strategic Fit

| | | |
|---|---|---|
| **Assessment Rating:** | **Amber** | There are issues in this Key Focus Area that require timely management attention. |

**Findings:**

The NFR Program is to deliver a national firearms register operating across all states and territories plus several Commonwealth departments: ACIC, AGD, ABF, AFP and Defence. The Program was endorsed by National Cabinet in December 2023 after which the Prime Minister noted, “This represents the most significant improvement in Australia's firearms management systems in almost 30 years and will keep Australia's first responders and community safer.”

Program budget arrangements and allocations were announced in the April 2024 budget with funding to initiate the Program beginning to flow in the 2024-25 budget year.

Public consultation has occurred, and the Program enjoys a solid social licence for its purpose and outcomes. Its outputs and outcomes are closely aligned to the mandates and strategic plans of participating organisations. The Program has been agreed and supported at the highest levels by State and Territory representatives.

The Program needs to engage a wide range of stakeholders both within Commonwealth and State and Territory Governments and beyond including firearm dealers, armorers, firearm users, importers, military and police organisations and special interest groups of many complexions.

Law and policy changes will be required particularly at the State and Territory level. Business process and organisational changes will also be required to take advantage of new and refreshed information technology processing systems.

There have been previous attempts to deliver a national firearms register which have not been entirely successful. These have generally encountered, and failed to fully resolve, issues arising from:

- The number and breadth of stakeholders and their variety of views, constraints and expectations,
- Complexity of law and policy change required to harmonise these across State and Territory registers while respecting their autonomy, and
- Poor data quality in existing registers which could not be practically resolved, and which has sapped confidence in use of a common register.

There is a strong intent among people interviewed in this review, that this program needs to successfully address issues that caused previous efforts to founder, and the Program structure has been designed with this in mind.

The Program structure comprises streams which are intended to ensure an appropriate degree of focus on challenging areas:

- Stakeholder Engagement
- Change and Adoption
- Legislation, Policy and Business Process

- Technical Uplift, and
- Data Uplift.

Each stream has made good initial progress in scoping out the work that will be required. However, each now urgently needs to flesh out plans in greater detail including detailed design, scheduling and management of interdependencies.

This is especially important for the Legislation, Policy and Business Process stream which represents a critical dependency currently actually delaying progress by jurisdictions. The Program high level plan forecasts State and Territory parliamentary consideration to take place in year four, the last year of the Program. This seems very late and gives rise to a significant risk.

Key items need to be agreed centrally before jurisdictions can assess their legislation to determine and design the necessary changes and to forecast the amount of time required and difficulty expected. Key items include definitions and processing standards, for example to accommodate the design intent of “near real time.”

Parts of the Program are critically dependent on this. Progressing the analysis of law changes depends on a legislative discovery and identification process scheduled for year one, but which does not appear to be being progressed with urgency. Stream leadership is part time and planned resources aren’t in place.

Strong full-time stream leadership is called for to accelerate progress.

The Data Uplift stream is progressing well with in principle agreement to the National Data Standard glossary. Significant challenges can be expected to arise as the standard is driven down to greater detail and common definitions need to be agreed across jurisdictions. The amount of time allocated to this in the schedule should be re-assessed to ensure it is not too ambitious. Consideration should be based on working backwards from critical dependencies on the data standard.

Experience has shown that challenging, long-term programs such as NFR can lose momentum when the focus of stakeholder organisations moves on to other urgent matters. The Stakeholder Engagement and Change and Adoption streams can play a role preventing this by helping ensure that stakeholders continue to have the strategy and outcomes visible in a compelling way.

**Recommendations:**

Nil

## Business Case and Benefits

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| **Assessment Rating:** | **Green** | There are no major outstanding issues in this Key Focus Area that at this stage appear to threaten delivery significantly. |

**Findings:**

The NFR Business Case was approved by National Cabinet on 6 December 2023. The value proposition is clear. The approved Business Case and the business need remain current.

The Commonwealth committed $161.3 million for implementation of the NFR over four years from July 2024. This funding included $101.8 million for Partner agencies, states and territories implementation of their systems that are integral to the NFR capability.

Benefits management planning is progressing well for this early stage of the Program. The draft Benefits Management Plan outlines the benefits management approach and provides a strategic view of the benefits expected from the program. This includes five primary and intermediate benefits, with mapping from program objectives and outcomes.

Initial work has been undertaken to break these five high-level benefits into a number of sub-benefits. These sub-benefits provide a reasonable start point for the next stages of development of Benefit Profiles and metrics and the Benefit Realisation Plan. Considerable work remains to be undertaken to develop an effective benefits realisation framework with well-defined metrics and baselines and a suitable benefits reporting regime.

The PMO team does include experience in benefit management and appears to understand the required effort and process required to establish the Program benefit realisation framework.

Benefit owners are not yet confirmed. Care will need to be taken to select appropriate Benefit Owners given the distributed contribution to benefits across ACIC and Partners. Training of Benefit Owners on their role is also likely to be required. Where key contributions to benefits are derived from jurisdictions, Benefit Owners in jurisdictions will need to be appointed.

The distributed nature and timing of delivery of elements of the NFR capability create a relatively complex benefits environment. A focus on keeping the Benefits Realisation Plan and reporting as simple as possible and focussing on major benefit contributors rather than all contributors will be important.

Development of benefit metrics should include relevant input from jurisdictions, for example in relation to data quality and take up metrics, to ensure that the selected metrics are suitable, able to be baselined and readily measured.

Benefit reporting is proposed to be delivered quarterly.

**Recommendations:**

Nil

## Stakeholders and End Users

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| **Assessment Rating:** | **Amber** | There are issues in this Key Focus Area that require timely management attention. |

**Findings:**

The successful implementation of the National Firearms Register (NFR) requires successful orchestration between multiple Commonwealth agencies and all jurisdictions. Although the NFR is a contentious policy area, social license is in place to deliver the Program. A well-designed user experience (UX), supported by effective change management, is essential to build on this social license and ensure compliance with the registry's use.

### Commonwealth Agencies

The Commonwealth agencies funded to deliver the NFR are ACIC, AGD, ABF, and AFP. ACIC, as the lead agency, is responsible for program delivery, while AGD takes charge of policy, legislation, and stakeholder engagement. These two agencies are closely aligned and consider the NFR a high-priority initiative, with joint plans in place to drive the program forward.

ABF plays a crucial role by managing the import of firearms and providing essential data to the register. Although ABF has made progress with a nearly final project initiation brief, its commitment to the program remains unclear. The agency has engaged in some workshops but has yet to integrate fully into the broader governance and planning frameworks.

The Department of Defence is another key player in managing the export of firearms, yet their involvement in the program remains limited. They have not participated in governance discussions and were not available for interviews during the review, raising concerns about their level of engagement.

### Jurisdictions

The program has strong support from the National Cabinet and is progressing well in several jurisdictions. Federation Funding Agreements (FFAs) have been signed with New South Wales, Queensland, South Australia, Tasmania, and the Northern Territory, providing a strong foundation for collaboration. However, agreements with Western Australia, Victoria, and the ACT are still being negotiated due to various reasons, including caretaker governments and the need for additional funding. Despite the delays, there is no indication of reluctance from these jurisdictions to participate.

Jurisdictions have been involved in developing the data standards and the program blueprint, showing an awareness of the challenges in delivering a nationally consistent solution. However, several unresolved issues around critical policy and data standards could delay aligned delivery, impacting the program's overall timeline.

### External Stakeholders

The public consultations held from April to May 2023 brought in feedback from law enforcement agencies, firearm dealers, and members of the public. Submissions responding to the consultation are overall of supportive the intent of the program. Concerns have been raised about:

- the practicality of tracking of gun parts,
- privacy and data security particularly issues of safety should identity details be breached, and
- Integrating disparate systems.

Whilst the Program has broad support, it has now been approximately 18 months since these stakeholders were engaged, and there is a growing need for further updates and involvement in the detailed design phase. Stakeholders remain anxious due to the lack of communication, with unresolved issues still pending, highlighting the need for more frequent and transparent engagement.

**End Users**

The NFR Solution Blueprint categorises stakeholders into two main groups: those who directly interact with the NFR and those who are affected by it. This distinction is critical as the program relies heavily on the accurate data entry of registration staff and firearm dealers, as well as the effective use of the system by frontline officers.

While the program has developed high-level communication and change adoption plans, it has yet to fully adopt a user-centred design approach. This shortfall risks misaligning the system with operational realities, which could negatively impact both usability and data quality. The Program has an opportunity to enhance system integration and functionality by judiciously involving users and collaborating with jurisdictions on interface design.

In addition, compliance with data entry and usage requirements will be crucial to the overall success of the system. Evidence from similar large-scale registries (such as those related to national security or other controlled goods) shows that adherence to data standards and timely reporting significantly affects the accuracy and effectiveness of the system. This framework could potentially include a mix of user training, incentive mechanisms, and auditing, alongside penalties for non-compliance. This approach will drive greater user engagement, system accuracy, and ultimately the successful adoption of the NFR.

**Recommendations:**

R1. ACIC to engage the ABF and Defence to ensure that their roles and responsibilities are clearly defined and integrated into the program structure and Governance.

R2. Adopt a user-centred design approach to ensure operational requirements are fully integrated into the NFR. Guidance: Map user pathways for dealers, register staff. Frontline staff. Conduct User Experience (UX) design on system interfaces.

R3. Develop a compliance framework that ensures end-user adherence to NFR data entry and usage standards. Guidance: This framework could include a mix of user training, incentive mechanisms, and auditing, alongside penalties for non-compliance. This will drive greater user engagement, system accuracy, and ultimately the successful adoption of the NFR.

## Governance and Planning

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| **Assessment Rating:** | **Amber** | There are issues in this Key Focus Area that require timely management attention. |

**Findings:**

The state of program planning and governance is not currently where it needs to be for this stage of the Program nor sufficiently robust to set a strong foundation for Program success.

**Governance**

While a program governance structure has been articulated on paper, less than half of the identified Program level governance bodies have currently been established. In particular, the Program Board (Partner Implementation Program Board) needs to be established and given appropriate authority as soon as possible. There is also a gap in the governance structure. Design governance arrangements including the ACIC Design Authority group and the Multi-Agency Architecture Group are being engaged but need to be integrated into Program Governance Structure and diagrams.

In addition, a clear design authority for the program needs to be established both the Multiagency Design Group and ACIC Design Authority are operating and their role in governance structure needs to be defined.

There are mixed views across the Program in regard to the suitability of the proposed governance arrangements, with many suggesting that the proposed arrangements are 'too heavy' and need to be tailored. There is also broad feedback that there is room for greater clarity in the responsibility boundaries for each governance board.

That said, there are pockets of planning and governance that are progressing well – for example the Northern Territory project planning documentation.

**Layers of Governance**

The NFR Implementation Steering Committee has been established and has held two quarterly meetings. There appears to be a consensus that this forum is operating effectively, focusing on strategic issues, but that it will benefit from the remaining governance structures being put in place.

The Partner Implementation Program Board (PIPB) has not yet been established and is identified to only meet every two months. If this body is to undertake the NFR Program Board functions monthly meetings will be required to ensure timely reporting, governance and decision making.

**Sub Program level Governance**

The NFR Portfolio Co-ordination Committee role is to co-ordinate efforts between ACIC and AGD. This forum has met twice. As the agencies are working closely together and have structured the program into five streams this may be more effective as a more frequent, less formal meeting dealing with day to day running of the program.

The ABF component of the program is reporting to an internal program board.

**Program Planning**

In terms of program level planning, artefacts are at a high-level, without sufficient detail to effectively guide the Program or to provide adequate reporting going forward. There is currently no Program Management Plan. ACIC and AGD Stream Project Plans are under

development (not sighted). A high-level Program Roadmap covering only the five program level streams being managed by ACIC and AGD is in place. While this is a good start, it does not include large parts of the program being run by Partners.

Review participants reported delays of one to two months in progressing some of the milestones in the high-level Program Roadmap, including the approval of the National Data Standards and commencement of the AFIN/NFID platform upgrade. In developing the Integrated Master Schedule a schedule baseline should be established taking account of existing delays and a realistic view of resourcing and program capacity.

More detailed program planning across the entire program is required to support the establishment of an integrated master schedule. While it is recognised that at this early stage some States and Territories do not yet have the capacity to provide the necessary inputs into the master schedule, these can be incorporated at a high level as mid to late adopters in the initial planning.

That said, there are pockets of planning and governance that are progressing well – for example the Northern Territory project planning documentation.

The program is relatively complex with some significant dependencies between streams and Partner projects. These dependencies need to be clearly identified and monitored.

**Reporting**

No formal program reporting is currently being employed within the NFR governance arrangements, although a program report template has been developed. Monthly reporting requirements from Partners has not yet been defined. Ideally these Partner reports need include a common information set to support ease of uplift in Program reporting.

While the FFAs include six-monthly milestones for Project Reports, there is only very broad guidance provided on what is to be included in these reports. Provision of a report template or report guidance will support a common level of reporting and support program governance.

**Recommendations:**

R4. Review, streamline and fully implement Program governance arrangements. Guidance: Distinguish between governance forums and working arrangements Review, streamline and fully implement.

R5. Implement formal Program reporting arrangements. Guidance: Program updates could be done now while formal reporting is appropriately designed.

R6. Develop an integrated master schedule including jurisdiction and agency milestones and key dependencies. Guidance: Consider resourcing while developing a realistic schedule.

## Risk Management

| | | |
|---|---|---|
| **Assessment Rating:** | **Amber** | There are issues in this Key Focus Area that require timely management attention. |

**Findings:**

NFR has a program level Risk and Issue Management Plan. It references that it conforms to ACIC Risk Management Policy and Procedures, to the ACIC P3M Handbook and to Australian Standard AS ISO 31000:2018. It is comprehensive including definition of risk levels, roles, responsibilities, risk management processes, review reporting and review schedules. Issue management is similarly covered. The management framework is sound, but its implementation and use should be improved to implement better practice risk management.

Risks are to be managed at four levels:

Enterprise – risks that threaten ACIC or AGD objectives

Strategic – risks that threaten NFR objectives or outcomes

Program – risks that threaten NFR program delivery within tolerances

Project – risks that threaten delivery of NFR projects.

ACIC and AGD project streams manage stream level registers. The register template covers risks, issues, benefit, change, staff, lessons learned, decisions, and product. Risks are included in all registers, and issues in some. Explicit instructions should be agreed with the streams as to which other tabs will be routinely updated.

There is also a Program level risk register which has been circulated to ISC members. This is a good practice, but the Program level register should be confined to critical and high risks that require Steering Committee attention. It presently contains low and medium rated risks as well as higher level ones which can be a distraction.

A further Project level risk category covers risks that threaten delivery of partner agency NFR projects. This anticipates that partner agencies will maintain their own risk registers and will report high and critical risks to the Partner Implementation Projects Board (PIPB). The detailed mechanics of partner project risk reporting is yet to be specified. For instance, will partners be required to use a common template or will they employ their own templates which will be “normalised” by a program office process?

According to the plan, partner projects report risks to the PIPB while ACIC and AGD projects are to report high and critical project risks to the Program Coordination Committee (PCC). This may not be the appropriate body and, in any case, high and critical risks, whether from ACIC/AGD streams or partner projects, need to be visible to a common body with full oversight of the program.

Managing risks in multiple registers is not a preferred practice as inconsistencies can easily be introduced.

For example, the Program risk register contains some risks that have been transferred to stream level registers. The process of transfer notes the risk identification number in the stream register which reflects good practice traceability.

However, in this case inconsistencies have already been introduced. Program risk NFR PR-11 rated High has been transferred to the Data Uplift register as risk NFR-DU-RSK-018 rated Medium. The risk description has been abbreviated in the transfer and appears to have a much narrower scope and different treatment, creating confusion and compromising effective treatment.

A further example is the Data Uplift register contains NFR-DU-RSK-007 which is about data stores not being cleansed to agreed standards. Its post treatment rating is High. This seems appropriate given the significance of data quality as a critical success factor for the Program and the difficulty of designing a fully effective treatment. It should be expected to appear in the Program register given the process as designed is to make critical and high risks visible to the appropriate governance body. The Program register contains two similar risks NFR PR-26 rated Low post treatment and NFR PR-16 which is closed.

Better practice is to maintain risks and issues in one “place” with filters and views for different uses. It is most important for high and critical risks with potential program level impacts to have visibility and clarity of remediation progress.

**Recommendations:**

R7. Create a single, program-wide risk register that pragmatically consolidates risks across all levels (strategic, program, and project) and partners with the capability to filter risks by their level of severity and source.

R8. Establish clear and standardised triggers and process for escalating risks from the project or partner level to the program level allowing for timely interventions by governance bodies such as the ISC.

## Review of Current Phase

| | | |
|---|---|---|
| **Assessment Rating:** | **Amber** | There are issues in this Key Focus Area that require timely management attention. |

**Findings:**

The National Firearms Register (NFR) program has made significant progress with important groundwork in place in several areas. The program has successfully initiated extensive consultation processes, developed a solution blueprint and high-level technical design, conducted technical and design reviews, developed initial governance structures, advanced work on data standards, developed a program investment logic, and progressed work on benefits realisation and change management.

Additionally, the Program has successfully derisked the delivery approach by leveraging and reusing existing technical platforms such as AFIN and NFID.

Partner engagement has also seen improvements, particularly with state and territory agencies which appear fully committed to the Program with some states already considering alignment with the emerging National Data Standards framework. These achievements are essential in setting a strong foundation for the program as it progresses.

**Public Consultation**

The public consultations for the National Firearms Register (NFR), held from April to May 2023, gathered feedback from key stakeholders including law enforcement agencies, firearm dealers, and the public. These consultations focused on improving firearm registration and tracking across jurisdictions, ensuring data security, and addressing concerns related to stakeholder integration. Firearm dealers emphasised the need for a user-friendly design to minimise operational disruptions, while law enforcement highlighted challenges in real-time data sharing and system integration across state borders. While the process highlighted significant challenges, such as ensuring data security and integrating disparate systems, it also provided the Program with valuable insights into stakeholder needs.

**Blueprint**

The program has developed a high-level blueprint that will help guide further design.

**Technical and Design Review**

A technical and design Review (called the 20% Review) conducted in September 2024 highlighted several key findings regarding the progress and challenges of the program. The review emphasised that while the foundational architecture and governance structures were largely in place, there were significant concerns surrounding data quality, system integration, and the inter-jurisdictional coordination necessary to meet the program's objectives.

Particularly, NFID integration and data cleansing efforts were identified as ongoing challenges, with recommendations to accelerate these activities to ensure that jurisdictions could onboard to the NFR as planned. The review also noted that more work is required to streamline the interaction between state and Commonwealth systems, particularly in ensuring real-time data sharing and improving the accuracy of firearm tracking across borders. Despite these challenges, the review concluded that with targeted improvements, the program is on track to deliver substantial progress over the next phase

However, there are several areas that need urgent attention. One critical issue is the resource shortfalls that are impacting multiple streams within the program. The slow recruitment

process, particularly for technical roles such as data analysts and system integration specialists, has contributed to delays in the Data Uplift and Technical Uplift streams. These delays have already affected the program's schedule and, without additional resources, will likely continue to create bottlenecks.

Furthermore, the absence of essential program documentation, including a comprehensive Program Management Plan (PMP) and a fully developed integrated master schedule with clearly defined interdependencies, poses a risk to effective program oversight. A number of project activities and milestones have been delayed by 1-2 months, including the National Data Standards approval and commencement of AFIN platform stabilisation. Implications of these delays are unclear due to absence of a detailed program schedule with dependencies.

An additional challenge is the lack of understanding of a key dependency i.e. the legislative changes that will be required to support the program. These legislative complexities vary widely across jurisdictions, and without a clear understanding of how these changes impact the program, both its scope, schedule and potentially costs are at risk. For example, Western Australia's recent firearms legislation introduces stricter ownership limits and specific licensing categories, which may create challenges for the NFR in terms of harmonising data across states and territories. If these legislative differences are not effectively understood and managed, there is a risk of inconsistent data within the NFR that could undermine the Program's integrity and reliability.

In terms of engagement, there has been a lack of involvement from critical Commonwealth partners, such as the Australian Border Force (ABF) and the Australian Defence Force (ADF). These partners are vital to the program's national objectives, and their limited involvement is creating risks that could compromise the program's success. Similarly, engagement with end users such as firearm dealers has been insufficient. These stakeholders are key to the operational success of the NFR, and their limited input thus far could result in misalignment between the system's design and its practical use.

In conclusion, while the NFR program has made significant strides in a number of areas including data standards and partner engagement, there are still key risks related to governance, resource shortfalls, understanding legislative impacts, and incomplete program documentation. Addressing these issues, particularly around recruitment, stakeholder engagement, and legislative dependencies, will be critical to keeping the program on track and ensuring that future milestones are met.

**Recommendations:**

Nil

## **Readiness for Next Stage** (Guidance – this Key Focus Area is intended to cover the period leading up to the next significant milestone)

| | | |
|---|---|---|
| **Assessment Rating:** | **Amber** | There are issues in this Key Focus Area that require timely management attention. |

**Findings:**

The readiness of the Program to proceed to the next stage is dependent on several critical factors, including completion of key program artefacts, resource mobilisation, technical integration, stakeholder engagement, and operationalisation of governance structures. There are notable areas of concern that must be addressed as the program successfully transitions into the next phase.

**Governance and Stakeholder Engagement**

Whilst robust on paper, the governance arrangements for the NFR program, require further operationalisation to ensure they are fit for purpose as the program enters its next phase. Governance structures must be streamlined and focused on key areas such as design, data quality, system integration, and risk mitigation.

Significant gaps remain in stakeholder engagement, particularly with some key Commonwealth partners including ABF and ADF. Without stronger, more proactive engagement, these stakeholders may not be fully integrated into the program's design and governance structures, leading to delays in decision-making and issue resolution.

Also, there is a wide range of stakeholder and end user engagement that needs to be carefully coordinated between the agencies. For example, AGD has responsibility for broad stakeholder engagement for policy setting while ACIC and the jurisdictions have responsibility for change management. In some cases, multiple agencies may need to engage with the same stakeholders for different purposes including user centred design.

The next stage will require governance bodies to play a more active role in driving the timely resolution of key resourcing, technical and legal issues and in enforcing compliance with the yet to be finalised National Data Standards. In addition, a robust reporting mechanism must be established to track progress, ensure accountability, and address risks promptly.

A key challenge is ensuring effective governance and oversight over NFR design. The design approach should fully encapsulate the national firearms ecosystem, including future systems that are under development or enhancement. For example, the GMS to be enhanced by ABF and Home Affairs to meet NFR requirements and the development and enhancement of firearm dealer portals by states and territories. Design governance structures must be designed to oversee the design features and integration of these systems, ensuring that they align with the broader objectives of the NFR. Without robust governance over these interconnected elements, there is a risk of fragmentation, where critical systems might not adhere to the National Data Standards or integrate smoothly into the NFR.

**Resourcing Gaps**

The NFR program continues to face significant resourcing challenges, particularly in terms of technical and specialist staffing. Recruitment delays in critical roles such as data analysts, technical integration experts and other key personnel have hindered the timely progression of important tasks such as detailed program planning, finalisation of data standards,

operationalisation of governance structures and establishment of robust reporting. Without these resources in place, the program risks further delay in meeting its milestones.

Moving forward, urgent recruitment efforts must be prioritised to fill these vacancies, ensuring that the right skills are available to manage the complex technical demands of integrating multiple state and federal systems into the NFR framework.

**Vendor Dependency and NFID System**

A significant dependency exists on EY, which is responsible for the ownership and support of the AFIN system. The quality of personnel provided by EY to manage and enhance the system has been flagged as suboptimal, leading to delays in critical activities such as system integration. Given that the AFIN system is essential for real-time data sharing across jurisdictions, these delays present a major risk to the program's ability to meet its next-stage milestones.

Mitigating this dependency will require close monitoring of EY's performance and the implementation of contingency plans in case further delays occur. The program should also explore ways to reduce its reliance on this vendor by developing additional technical expertise in-house or through other partnerships.

**Legislative Impacts on Scope and Schedule**

Legislative alignment is a well-known challenge for national programs that span both Commonwealth and state jurisdictions, and the NFR is no exception. Several interviewees expressed worries about the delays in scoping the legislative changes necessary for the NFR to be fully operational. These concerns are compounded by the differences in state and territory firearms legislation, as well as the ongoing adjustments to these laws, which remain in a state of flux. Without a clear and expedited path to legislative resolution, the ability to stand up and maintain the NFR effectively could be compromised.

Recent legislative changes in Western Australia (WA) for example, could potentially introduce additional complexities to the NFR's scope and schedule. WA's new Firearms Act 2024, which introduces stricter licensing categories, Firearm Prohibition Orders, and limits on firearm ownership, will require close coordination to ensure consistent data reporting and adherence to the National Data Standards.

The risk here lies in the alignment of WA's laws with other jurisdictions, particularly where legislative differences may create challenges for integrating firearm data into the NFR. In addition, there are differences between who/which Department in states and territories (Law Enforcement agencies or Departments of Justice or a combination of both) takes the lead in assessing and driving legislative change

To mitigate this risk the legislation stream should engage closely with state and territory governments and Commonwealth delivery partners to ensure that legislative, regulatory and procedural frameworks align, and that data governance and reporting mechanisms are standardised across all jurisdictions to meet the objectives and outcomes of the NFR. These features could potentially include:

- Adherence to Data Definitions and Standards: Adherence to unified data standards across jurisdictions to ensure seamless integration and accurate tracking of firearms, firearm parts, and ownership information

- Timeliness of Data Entry: Legislation mandating real-time or immediate reporting of firearm transactions (sales, transfers, destructions etc.) to ensure up-to-date tracking
- Mandatory Use of Electronic Channels: Requirement for firearm dealers and other stakeholders to input data via electronic systems, eliminating paper-based processes to enhance data accuracy and speed
- Information Sharing and Privacy Protection: Legislation addressing the balance between effective information sharing across agencies and ensuring privacy and data security, particularly for sensitive personal information.
- Licensing Verification and Regulatory Alignment: Standardisation of firearm licensing verification processes across states and territories to improve NFR's integrity
- Legislative Adjustments for Jurisdictional Integration: Laws facilitating cooperation between Commonwealth agencies like ABF and Defence, and state/territory authorities to ensure smooth integration into the NFR

**User Centred Design**

While there is recognition of the need to involve critical external stakeholders, such as firearm dealers, the actual engagement with these parties remains limited. This lack of engagement could lead to misalignment between the design and the operational realities faced by stakeholders. As the program moves forward, this engagement and design collaboration will be essential to ensure the design is robust enough to meet the program's objectives.

**Conclusion**

The NFR program has made progress, but several critical areas require immediate attention. Addressing resourcing gaps, improving vendor management, aligning legislative frameworks, strengthening governance structures and end user engagement will be essential to ensuring the program's success. With the right focus, these challenges can be mitigated, allowing the program to move forward on a more stable footing.

**Recommendations**

R9. Develop a comprehensive Resource Management Plan to mitigate critical resourcing risks. Guidance: Consider delivery partners in this plan.

R10. Appoint a dedicated Program resource with the right capability to expedite the development of key project management documents and streamline governance processes, ensuring they are operationalised and effectively driving the program forward

R11. Appoint a full-time Legislative Stream lead supported with appropriate resources to ensure the timely settlement of legislative features required for the NFR's implementation across all jurisdictions and aligning legal frameworks with the program's objectives.

R12. Develop a clear set of design principles that fully encapsulate the national firearms ecosystem, ensuring that all future systems and enhancements align with the broader objectives of the NFR and adhere to National Data Standards.

R13. Conduct a mid-stage review

# Appendix A: Gateway Assurance Plan

Gateway reviews complement other external and internal assurance activities and form part of the entity's overall assurance framework. Better practice indicates that developing an assurance plan for the program/project early in its life cycle is a key factor in delivering successful programs/projects. Such a plan would indicate the need for both milestone-based and time-based assurance reviews and would help ensure the program/project received the appropriate level of independent assurance.

The Gateway Assurance Plan is tabled below:

| Date | Type of Review | Comments |
|---|---|---|
| October 2024 | First-Stage Review | Amber |
| May 2025 | Mid-Stage Review | |
| | | |
| | | |
| | | |

# Appendix B: Previous Recommendations

Not Applicable to this review

The following table outlines the recommendations made during the previous Gateway Review and the actions taken by the entity to address the recommendations.

Prior to the review, the entity should complete the 'Action Taken' column demonstrating the remedial actions taken to implement the recommendations.

The review team will review the actions taken and indicate whether the recommendations have been addressed as defined below, further comments should also be provided where recommendations have only been partially addressed or not addressed.

**Fully:** The recommendation has been fully implemented by the entity.

**Partially:** The recommendation has been partially implemented by the entity.

**Not Addressed:** The recommendation has not been implemented by the entity.

## Previous Recommendations and Actions Taken

| Item # | Recommendation | Category | Action Taken | Review Team Comments |
|---|---|---|---|---|
| | N/A - no previous reviews | | | |
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# Appendix C: Review Checklist

## Policy Context and Strategic Fit:

### Assessment Rating: Amber

| | Key Focus Area Question | Comments |
|---|---|---|
| 1.1 | Is the program supporting a new policy measure or other government initiative? Are the implications of the measure/initiative well understood? | Yes. The program has been approved by National Cabinet in Dec 2023 with support from all jurisdictions<br>Implications of multi-agency multi-territory partnership is understood at high level and planned for in governance and risk models to an extent but risk due to number of parties and differing levels of maturity gives rise to risk |
| 1.2 | Is legislation required? Have legislation requirements and timeframes been built into the program plan? | One of the Program streams covers Legislation, Policy and Business Process reform.<br>Legislation and policy changes will be required. There are varying views as to the extent. Data sharing is already largely in place supported by legislation but matters of definition and regulation vary. The amount of work to be done remains unknown until conclusion of a discovery process scheduled for year 1 of the Program. Parliamentary consideration is scheduled for Year 4 which is late in the process for a critical dependency. Variation can be expected among jurisdictions. |
| 1.3 | Is there a clear understanding of the required outcomes to be achieved and benefits to be realised? | Yes. The Benefit Management Plan includes clear definition of outputs, outcomes aligned to strategic objectives. Definition of benefits is still at the strategic level. |
| 1.4 | Will the proposed program design deliver the government's intent? Is it aligned to the agency's strategic plans? | Yes, potentially. Streams as designed suggest solid planning for delivery. There will be coordination challenges across streams and among stakeholders to maintain alignment.<br><br>ACIC Corporate Plan 2024 driven by strategic direction from Board and PBS (parliament) and jurisdiction recognition priority also aligned to public safety mandates of police organisations. |
| 1.5 | Does the program/project understand the users' needs and their context for using the system? | The Program has social licence supporting it.<br><br>There has been a public consultation, summarised in a document supplied. Stakeholder stream and Change and Adoption streams both focus on outreach to users. Both stop short of planning to employ user centred design approaches.<br>In scope of stakeholder engagement stream focusing on communication. Change stream focuses on partners and staff.<br>Need to ensure that engagement goes right to the coal face users of the system. They must appreciate their importance as the source of data quality and so the vision / rationale for the NFR must be clear to them and regularly reinforced. |

| Key Focus Area Question | Comments |
|---|---|
| 1.6 Does the program/project involve other entities? Have interdependencies been identified and management of them agreed? | This is a multiagency implementation including all states and territories (co-funded) and multiple commonwealth agencies including ACIC $29.4m, AGD $7.8m, ABF 20.8m and AFP $1m<br>Interdependencies are a focus at a high level, but need to be fleshed out in detail.<br>Managing interdependencies in planning and reporting across the many organisations involved will present challenges |
| 1.7 In the cases of whole-of-government or multi-entity proposals, have issues of access, custody, sharing and ownership of data been addressed? | Yes, states and partners own their data and share it with NFR<br>Sharing is a legislation question for some states – process to scope changes is under active consideration. |

## Business Case and Benefits:

### Assessment Rating: Green

| Key Focus Area Question | Comments |
|---|---|
| 2.1 Strategic Fit: Is the business case up to date and does it continue to demonstrate the business need and contribute to the business strategy? | Yes. The Program was approved in December 2023. The business need remains relevant and an agreed high priority. |
| 2.2 Options: Is the preferred way forward still appropriate? | Yes. A federated architecture remains the preferred approach. Approval to leverage and extend AFIN/NFID was received in December 2023. This way forward still appears to be appropriate, noting detailed design of the solution is not complete. |
| 2.3 Value for Money: Are the proposed delivery arrangements likely to achieve value for money? | N/A. The program comprises a wide range of delivery arrangements between agencies and Partners, mostly at an early stage of planning. Insufficient information is available at this time to assess Value for Money. |
| 2.4 Affordability: Are the costs within current budgets?<br>Is the program/project funding affordable and supported by key stakeholders? | Yes. Only ACIC project tracked budgets for the Financial Year were provided. At this early stage, no significant concerns were raised in relation to program funding.<br>Funding allocations are supported by key stakeholders. A number of jurisdictions identify risks with the cost base due to their detailed project plans and associated costings not being finalised. |
| 2.5 Achievability: Is the entity still realistic about its ability to deliver the outcomes and realise benefits? | Yes, noting the early stage of the program and significant work still to be done in fully establishing the program and the benefits regime. Key program staff understand the significant risks confronting successful program delivery (including data quality, vendor performance and resolution of legislative approach and data definition). |
| 2.6 Organisational Change: If benefits and outcomes are dependent on organisational change, is there a plan for this, is it on track and is it achievable? | Yes. Preliminary change management planning has commenced. Some change management resourcing in ACIC and across Partners is still to be confirmed and ramped up. |
| 2.7 Benefits: Are the outcomes delivered and the benefits to be realised understood and agreed to with benefit owners? | Yes, for the current Program stage.<br>Benefits planning is still developing. The draft Benefits Management Plan indicates an understanding of the key activities required to establish Benefit Profiles and the Benefit Realisation Plan. |
| 2.8 Benefits: Is there a strategy and plan for realising benefits? Is it current? | No, not at this stage. Benefits realisation planning is still at an early stage. However, the PMO team is progressing benefits planning appropriately. |

## Stakeholders and End-users:

### Assessment Rating: Amber

| | Key Focus Area Question | Comments |
|---|---|---|
| 3.1 | Have the stakeholders and their areas of interest been identified, and do they support the program/project? | Partial Key stakeholder groups have been identified and public consultation took place in April-May 2023. Submissions responding to the consultation are overall of supportive the intent of the program. Though concerns have been raised about the practically tracking of gun parts and privacy particularly issues of safety should identity details be breached.<br>However, stakeholders have received little information since initial consultation and are keen to be involved in detailed design of the program. |
| 3.2 | Is this a whole of government initiative or are other agencies involved in design, development or delivery? | The program is a multi-agency and all jurisdiction delivery. There are Federation Funding Agreements with milestones signed with NSW, Queensland, South Australia, Tasmania and Northern Territory. Still being negotiated with WA, Victoria and ACT This is good practice. The funded. Commonwealth agencies are ACIC, AGD, ABF and AFP. Defence is a critical part of this ecosystem and was not available to interviewed for this review. |
| 3.3 | Have stakeholder and end-user needs been taken into account in the program design? | All jurisdictions and agencies were involved in producing the program blueprint.<br>However, while the program has identified some stakeholders as end-users a user centred design approach and accountability is not incorporated into the change and adoption approach. |
| 3.4 | Do stakeholders support the business case and the selection of the preferred option? (This includes the potential or recommended delivery approach and mechanisms.) | All states and territories support the business case.<br>This is a high priority for AGD and ACIC. ABF has commenced work, but organisational priority is not clear and they are yet to be incorporated into the program structure. |
| 3.5 | Are the Stakeholder Engagement Strategy and supporting governance arrangements fit for purpose, and do they recognise the need to engage with external whole-of-government and multi-entity stakeholders? | Partial The top-level approach to Stakeholder Engagement is fit for purpose but its yet to implemented and fine-tuned. |
| 3.6 | Are stakeholders confident outcomes will be achieved when expected? | Partial Stakeholders are uncertain about timing and have a range of expectations |
| 3.7 | Do stakeholders feel sufficiently engaged? | No Stakeholders are keen for further engagements and dealers are critical for successful implementation. |

## Governance and Planning:

### Assessment Rating: Amber

| Key Focus Area Question | | Comments |
|---|---|---|
| 4.1 | Are the proposed governance arrangements fit for purpose? | No. Currently only half of the governance boards are in operation. The Program Board (PIPB) has is not yet established. Formal reporting has not yet commenced.<br>Proposed program governance arrangements appear quite heavy. Insufficient distinction between working and governance forums.<br>Design Authorities and other linking committees not shown in governance arrangements. |
| 4.2 | If other agencies are involved in design and delivery, how will they be included in the governance framework? | Partners (Commonwealth agencies and State/Territory Police Forces) are included in the Implementation Steering Committee. They are also planned to be represented in the yet to be stood up PIPB and PPMF. These arrangements are similar to those employed in NCIS, which have been indicated to have provided suitable governance and engagement at different levels of the NCIS program. |
| 4.3 | Have the program management, design and delivery methodologies been chosen and are they appropriate? | N/A. At this early stage the selected methodologies appear to be suitable. |
| 4.4 | Has a steering committee, or equivalent, been established to oversee the project? | Yes. The NFR Implementation Steering Committee has been established and has met twice to date. This strategic steering committee meets quarterly. |
| 4.5 | Is there a process to manage scope change? Is it effective? | No. Not at this stage while governance arrangements are still being established. |
| 4.6 | Is there executive level commitment to the project? Are responsibilities clear? Have key positions been staffed or are there plans to do so? | Yes. There is strong executive level commitment to the project across ACIC and those Partner agencies interviewed. |

## Risk:

### Assessment Rating: Amber

| | Key Focus Area Question | Comments |
|---|---|---|
| 5.1 | Has the agency managed programs of this size and complexity before? | Yes. NCIS is a similar scale and has overcome some challenges which provides learning opportunities for this program. |
| 5.2 | Is there an organisational framework for managing risks and issues associated with this program? | Yes<br>Good quality Project Risk and issues plan<br>Defines risk applicability levels, roles and responsibilities, escalation levels, review meetings<br>Appears to conform to ACIC risk framework and ISO standards<br>The framework applies to ACIC. AGD run parts of the program, it will be challenging to roll up risk processes from jurisdictions and other agencies who will have their own standards and reporting practices. |
| 5.3 | Are there processes and systems in place to manage Risks, Assumptions, Issues and Dependencies (RAID) and are they fit for purpose? | Partial RAID registers exist at the stream level but only risks are populated in the version seen. Risk and Issue management framework is published but not clearly being worked<br>Note partner agencies will employ their own risk and issue management processes – out of scope for program plan – is there a means / forum for them to be visible at program level? What program level reporting will be done for partner projects?<br>Risk escalation trigger is not clear from project level to program |
| 5.4 | Have the major risks been identified and risk owners appointed? | At stream level, owners (position and responsible officers identified – generally the project manager who is not always appropriate owner - should be person who can best mitigate the. risk<br>At program level. Strategic risks reported to ISC have been added to the program risk register but not had all columns completed |
| 5.5 | Are RAID Registers reviewed and updated regularly and briefed to governance committees and management as appropriate? | According to framework yes but not sighted by review team<br>ISC initial list presented but content not fully completed – no rating, no owner |
| 5.6 | Are there contingency plans that address risks as necessary? | Not sighted |
| 5.7 | Have assurance arrangements for the program been put in place and is there an Assurance Plan? | DTA Tier 2 Assurance Plan filed – Artefact 9 in Planning Meeting folder completed to satisfaction of DTA.<br>The Division has engaged Axiom for external assurance for a number of programs, including NFR. |

## Review of Current Phase:

### Assessment Rating: Amber

| | Key Focus Area Question | Comments |
|---|---|---|
| 6.1 | Is there an integrated master schedule showing the program/project milestones along with the milestones and interdependencies of projects? Is the level of detail appropriate for the stage of the program/project? | Partial: While there is a program roadmap, it is not fully integrated across all streams, particularly with respect to interdependencies among data, legislation and technical uplift streams. The level of detail for some streams (e.g., Data Uplift) is appropriate, but gaps remain in clearly defining and tracking interdependencies with partner agencies, including potential legislative changes and broader technical integration. |
| 6.2 | Are the program/project key milestones compliant with broader government or entity timing requirements? | Partial: Some milestones align with broader government timelines, but certain technical milestones (e.g., system integration and data remediation) are at risk due to delays. Coordination with Commonwealth and state agencies has been slower than expected. |
| 6.4 | Does the program/project schedule appear to be realistic and achievable, and does it include an appropriate allowance for contingency? | No: The upfront delays in data uplift and technical uplift streams indicate that the schedule is overly optimistic, with limited contingency allowances. Delays in filling key vacancies, slowness of ACIC recruitment processes and slower-than-expected partner agreement have already led to schedule slippage in the above streams.<br>Discussions around data standards and partner system integration indicate delays that were not anticipated in the original timeline implying lack of contingency built into the schedule to address emerging challenges.<br>In addition, lack of understanding of Legislative impacts and lack of engagement with end users might further impact planned milestones. |
| 6.5 | Are the initial stages of the program progressing in accordance with the schedule? | No: There have already been 1-2 month delays in key milestones, particularly in finalising data standards, and commencement of AFIN platform stabilisation. Implications of these delays is not clear due to absence of detailed program schedule with dependencies.<br>Program Management, Data Uplift, Technical Uplift, Legislative streams and NFR projects in some states remain under-resourced which will continue to impact timelines particularly data remediation and system integration timelines. |
| 6.7 | Have issues emerged and have they been resolved? | Partial: Several issues have emerged throughout the current phase, particularly related to development and finalisation of data standards, technical system integration, and partner engagement.<br>Interviewees highlighted misalignment on legislative requirements, and inconsistent progress in data standards and remediation across jurisdictions.<br>While some issues are being actively addressed, such as ongoing recruitment efforts and coordination with partner agencies on data standards, other critical issues—such as a clear understanding of legislative changes to support the program and partner adherence to the National Data Standards remain unresolved.<br>Challenges remain with partner agencies aligning to the National Data Standards. Data cleansing cannot fully proceed until these standards are agreed and uniformly applied. |

## **Readiness for Next Stage** (the period until the next review)

### **Assessment Rating:** Amber

| | Key Focus Area Question | Comments |
|---|---|---|
| 7.1 | Is the program on track to receive government or other approval to move to the next stage? | Yes. Funding has been approved, funding flows to jurisdictions based on agreed milestones. |
| 7.2 | Are the funds available to undertake the next phase? | Yes |
| 7.3 | Has the entity assessed its readiness to proceed to the next stage? | No. There have been delays in several areas including resource mobilisation.<br>There has however, been good progress in several areas including development of data standards, program logic, benefits and onboarding of staff in key positions such as change management. |
| 7.4 | Does the program/project have the capability and capacity (right skills in the right quantity including specialist advice) ready to deliver the next stage? | Partial. There are notable shortfalls in both technical capacity and specialist advice in ACIC. Vacancies in critical roles, such as data analysts and technical integration leads, are impacting the program's ability to proceed as planned<br>Partner agencies also highlighted issues with timely recruitment of the right skillsets required to progress the program. |
| 7.5 | Are the plans for the next phase, including the integrated master schedule, fit for purpose and achievable? | No. While detailed planning is underway, delays in foundational activities like data standards will likely impact the achievability of the next phase.<br>While high level plans are in place, they are not fully achievable under current conditions. Given upfront delays, the schedule appears optimistic to handle emerging risks, especially around legislative alignment, data remediation and system integration. |
| 7.6 | Are the governance arrangements for the next stage in place and fit for purpose? | Partial. The governance structure is outlined in the NFR Program documentation however these structures need to be streamlined and operationalised.<br>Governance also needs to be strengthened to deliver program outcomes particularly in enforcing data standards and ensuring more consistent partner engagement.<br>Additionally, vacant roles in governance and oversight functions present risks. |

# Appendix D: List of Interviewees

| Name | Role/Position/Entity | Date Interviewed |
|---|---|---|
| s 22(1)(a)(ii) | NFR Program Manager, ACIC | 14 Oct 24 |
| s 22(1)(a)(ii) | Deputy Senior Responsible Officer, AGD | 14 Oct 24 |
| Alex Engel | Lead Supplier, AGD Streams, AGD | 14 Oct 24 |
| Sarah Chidgey PSM | Deputy Secretary, AGD | 14 Oct 24 |
| Jeremy Johnson | Senior Responsible Officer, ACIC | 14 Oct 24 |
| s 22(1)(a)(ii) | Project Manager – Technical Uplift, ACIC | 14 Oct 24 |
| Sam Lewis | A/g Senior Supplier, ACIC (CIO) | 14 Oct 24 |
| s 22(1)(a)(ii) | Commander, Firearms Registry, NSW Police | 14 Oct 24 |
| s 47E(d) | | |
| s 22(1)(a)(ii) | NFR Business Architect., ACIC | 15 Oct 24 |
| s 22(1)(a)(ii) | Project Manager - Business Change, ACIC | 15 Oct 24 |
| s 22(1)(a)(ii) | Project Manager - Stakeholder Engagement, AGD | 15 Oct 24 |
| s 22(1)(a)(ii) | Project Manager - Data Uplift, ACIC | 15 Oct 24 |
| s 22(1)(a)(ii) | NFR ISC Representative, VIC Police | 15 Oct 24 |
| s 22(1)(a)(ii) | A/g Superintendent, Australian Border Force | 15 Oct 24 |
| s 22(1)(a)(ii) | Senior Divisional Manager, Victoria Police | 16 Oct 24 |
| s 22(1)(a)(ii) | Director NFR Project, NT Police | 16 Oct 24 |
| s 22(1)(a)(ii) | Project Manager - Legislation and Policy, AGD | 16 Oct 24 |
| David Hudson | Deputy Commissioner, NSW Police | 16 Oct 24 |
| Laurent Berlioz-Nott | NFR Lead User, ACIC | 16 Oct 24 |
| s 47E(d) | | |
| David Thavasuthan | A/ Portfolio Assurance Branch Manager<br>Digital Transformation Agency | 16 Oct 24 |
| s 22(1)(a)(ii) | a/ Director Assurance Strategy and Engagement<br>Digital Transformation Agency | 16 Oct 24 |

# Appendix E: List of Documents Reviewed

| Document Title | Version no. and/or Publication date |
|---|---|
| NFR Cabinet Decision | - |
| National Cabinet Meeting Extract | 03/02/2023 |
| NFR Budget | 01/07/2023 |
| AGD Consultation Summary | N/A |
| NFR Blueprint | v3.6 |
| Investment Logic Map (ILM) | v1.0 |
| Implementation Roadmap | 08 Aug 2024 |
| CONOPS | Draft as at 29 Aug 2024 |
| CONOPS w Program Output Overlay | Draft as at 29 Aug 2024 |
| Governance Model/ Framework | 01/05/2024 |
| Budget - Financial Report | 01/08/2024 |
| NFR Program Acronyms Glossary | 01/09/2024 |
| DTA Assurance Plan | 25/06/2024 |
| Benefits Management Plan | 01/10/2024 |
| Risks and Issues Management Plan | 01/10/2024 |
| Stream 1 – Stakeholder Engagement - Project Brief | 01/10/2024 |
| Stream 1 – Stakeholder Engagement - Risks and Issues | 01/10/2024 |
| Stakeholder Engagement and Communication Strategy | 01/10/2024 |
| Stream 2 - Legislation and Policy - Project Brief | 01/10/2024 |
| Stream 2 - Legislation and Policy - Risks and Issues | 01/10/2024 |
| Stream 3 - Data Uplift - Project Mandate | 01/10/2024 |
| Stream 3 - Data Uplift - Project Brief | 01/07/2024 |
| Stream 3 - Data Uplift - Risks and Issues | 01/09/2024 |
| National Data Standards - NDS | V0.7 |
| Stream 4 - Technical Uplift - Project Mandate | 01/07/2024 |
| Stream 4 - Technical Uplift - Project Brief | 01/10/2024 |
| Stream 4 - Technical Uplift - Risks and Issues | 01/07/2024 |
| Stream 5 - Business Change – OCM Placemat | 30/09/2024 |
| All State and Territory FFAs - 5 Co-signed_3 AGD Signed | 01/07/2024 |
| NT NFR Program Delivery Plan v1.0 | v.01 |
| NT NFR Proposed Budget | v.01 |
| NT NFR Business Change Stream Project Plan | v.01 |
| NT NFR Data Uplift Stream Project Plan | v.01 |
| NT NFR Firearms Registry and Portal Uplift - Project Plan | v.01 |
| NT NFR Firearms Registry Integrations - Project Plan | v.01 |

| Document Title | Version no. and/or Publication date |
|---|---|
| NT NFR Legislation Policy and Business Processes Reform Stream Project Plan | v.01 |
| NFR ISC ToR | 21/05/2024 |
| NFR ISC Minutes | 21/05/2024 |
| NFR ISC Agenda | 27/08/2024 |
| Portfolio Coordination Committee (PCC) ToR | V1.0 |
| PCC Agenda & Minutes | 14/08/2024 |
| Partner Implementation Program Board (PIPB) DRAFT ToR | V.03 |
| Police Ministers Council (PMC) ToR | V1.0 |
| PMC Agenda and Papers | 03/04/2023 |
| PMC Agenda and Papers | 09/06/2023 |
| Documents Supplied During Review | |
| Program Output Detail - Registry DRAFT | Draft – Oct 24 |
| NFR Program BI-Monthly Status Report | Drat – Oct 24 |
| CEO Briefing NFR AFIN Re-use decision | 09/01/2024 |
| Notes against document 23_370602 | 09/01/2024 |
| Assessment of AFIN to be NFR Central Database | 11/11/2023 |
| AGD - NFR Fortnightly Status Report | 11/10/2024 |
| ACIC National Firearms Register - Design Authority 20% Review | Sept 2024 |
| ABF High Level Process and NFR Impact Analysis DRAFT | 15/10/2024 |
| NFR Program Level Risk Register | 01/09/24 |
| National Gun Conference https://youtu.be/7t_xiWWOj-8?si=0vcmA1oJhN1Zzr39 | |

# Appendix F: Assessment Ratings and Definitions

## *Delivery Confidence Assessment Rating Definitions*

The review team will provide an overall delivery confidence assessment (DCA) based on the definitions below. The review team should consider the individual Key Focus Area assessment ratings (defined below) and exercise their own judgement/expertise to determine the most suitable overall assessment of delivery confidence rating.

| **DCA Assessment Ratings** | |
|---|---|
| **Assessment** | **Definition** |
| Green | Successful delivery of the program to time, cost, quality standards and benefits realisation appears highly likely and there are no major outstanding issues that at this stage appear to threaten delivery significantly. |
| Green/Amber | Successful delivery of the program to time, cost, quality standards and benefits realisation appears probable however constant attention will be needed to ensure risks do not become major issues threatening delivery. |
| Amber | Successful delivery of the program to time, cost, quality standards and benefits realisation appears feasible but significant issues already exist requiring management attention. These need to be addressed promptly. |
| Amber/Red | Successful delivery of the program to time, cost, quality standards and benefits realisation is in doubt with major issues apparent in a number of key areas. Urgent action is needed to address these. |
| Red | Successful delivery of the program appears to be unachievable. There are major issues on program definition, schedule, budget, quality or benefits delivery. The program may need to be re-baselined and/or overall viability re-assessed. |

## *Key Focus Area Assessment Rating Definitions*

The review team will provide an assessment against each of the Key Focus Areas probed. This will provide a level of granularity to assist entities to identify and address the key issues.

| **Key Focus Area Assessment Ratings** | |
|---|---|
| **Assessment** | **Definition** |
| Green | There are no major outstanding issues in this Key Focus Area that at this stage appear to threaten delivery significantly. |
| Amber | There are issues in this Key Focus Area that require timely management attention. |
| Red | There are significant issues in this Key Focus Area that may jeopardise the successful delivery of the program. |

### *Report Recommendation Category Definitions*

The review team will rate individual recommendations with a sense of urgency as defined below:

**Critical (Do Now):** To increase the likelihood of a successful outcome it is of the greatest importance that the program should take action immediately.

**Essential (Do By):** To increase the likelihood of a successful outcome the program should take action in the near future. Whenever possible essential recommendations should be linked to program milestones (e.g. before contract signature and/or a specified timeframe i.e. within the next three months).

**Recommended:** The project should benefit from the uptake of this recommendation. If possible, recommendations should be linked to program milestones (e.g. before contract signature and/or a specified timeframe i.e. within the next three months).